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**Saint Michael's Hospital**  
**MINISTRY HEALTH CARE**

*Sponsored by Sisters of the Sorrowful Mother*

March 30, 2007

Centers for Medicare & Medicaid Services  
Office of Strategic Operations and Regulatory Affairs  
Division of Regulations Development – C  
Attention: Bonnie L. Harkless  
Room C4-26-05  
7500 Security Boulevard  
Baltimore, MD 21244-1850

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Dear Ms. Harkless:

We would like to provide you with a few comments about the Occupational Mix Survey proposed process on behalf of the hospitals that we serve, namely Saint Michael's Hospital, provider number 52-0002, and Saint Clare's Hospital, provider number 52-0202. Our comments are as follows:

1. Make the Occupational Mix Survey match the hospital's fiscal year. I understand that CMS is working to make the Occupational Mix Survey easier to complete. This would be the easiest for the hospitals to complete.
2. Make the Occupational Mix Survey include wage and wage-related cost accruals. This makes it easier to tie to our financial information.
3. Include all payment types into the Occupational Mix Survey. Shift differentials and on-call pay are common elements in healthcare wages. It is hard to believe that including these pay types would skew wage results dramatically, but it would make completion of the Occupational Mix Survey much easier to complete.

Thank you for taking the time to review our comments. If you have any questions, please contact me 715-343-3402.

Sincerely,

Craig Aittama  
Controller

Andrea Kubisiak  
Reimbursement Supervisor

Gail Dombrowski  
Senior Accountant

**Where caring makes the connection.™**