

**Responses to Comments Received  
Federal Register Notice on Extended  
CMS-1880 and CMS-1882  
OMB 0938-0027**

CMS received comments from two commenters on the December 23, 2011, 60-day Federal Register notice regarding the extension of CMS-1880 and CMS-1882, Certification as a Supplier of Portable X-Ray and Portable X-Ray Survey Report Form and Supporting Regulations at 42 CFR Part 486.100-486.110.

**Comment on the Form CMS-1880**

One commenter recommended that CMS update the Federal Register notice to state the form in question is CMS-1880, not the CMS-1882.

**CMS Response**

CMS reviewed the Federal Register notice. The form identification numbers are correct as printed.

**Comment on the Burden Estimate**

One commenter recommended updating the burden estimate by including the average number of portable x-ray suppliers that submitted the CMS-1880 over the previous three years and adding the total number of portable x-ray suppliers enrolled in the Medicare and Medicaid programs.

**CMS Response**

CMS does not have a burden estimate for the Form CMS-1880 (when completed by applicants) as the form is completed by applicants before they enter the Medicare program. The burden estimate for completion of the form is provided for State Agency surveyors who complete the form as part of the recertification survey. The number of portable x-ray suppliers completing the form is not relevant to the burden estimate for the reason stated above.

**Comment on the date at the bottom of Form CMS-1880**

Commenter recommended updating the date at the bottom of the form once OMB approves the form.

**CMS Response**

CMS only changes the date on a form when the form is updated by CMS. The date at the bottom of the form does not reflect the date that OMB approves forms. CMS does not put the expiration date on the form as that would create undue burden on CMS as the form would have to be updated every three years.

**Comment on the National provider Identifier (NPI)**

Commenter recommended revision of instructions for Medicare Provider Number to reflect the National Provider Identifier (NPI).

**CMS Response**

An NPI number is not used as it is not associated with the survey process. Current plans are to update the S1 data field from the Medicare/Medicaid provider number to a Centers for Medicare and Medicaid Certification Number (CCN). This package does not propose that change.

**Comment on eliminating Form CMS-1880**

Commenter suggested eliminating Form CMS-1880 and incorporating the information from this form on the Medicare enrollment application (Form CMS-855).

**CMS Response**

CMS uses the information contained on the Form CMS-1880 in the Survey and Certification data systems. The information is not taken from the Form CMS855 for any provider or supplier that is surveyed. CMS has no plans to change this process in the immediate future.

**Comment regarding data field titled “State Region” on the Form CMS-1882.**

Commenter recommended deleting the field titled “State Region” from the form as it is not necessary for the public to respond to the field.

**CMS Response**

CMS uses this data field for regional office purposes. The commenter is correct in saying the field is not completed by the applicant, however it is completed by the appropriate regional office.

**Comment regarding Question II on the Form CMS-1882.**

Commenter suggested including regulatory reference for Question II or deleting this question.

**CMS Response**

CMS will take this suggestion into consideration for the future.