

## **Exhibit B – Burden Calculation from 2013 Hospice Rule PRA Package**

### **Hospice Quality Reporting Program Burden Calculations**

#### **Background Facts**

- Total Number of HOSPICES in U.S. = 3632
- Average Number of Hospice Quality Reporting Program submissions/per Hospice/Year = 2
  - o 1 submission for structural measure data - (submission deadline January 31st 1<sup>st</sup>)
  - o 1 submission for NQF#0209 pain measure – submission deadline April 1<sup>st</sup>)
- Number of Hospice Quality Reporting Program submissions for all Hospices/Year = **7,264 submissions per year** (3632 Hospices in U.S. x 2 submissions per year = 7,264)
- Average time spent by each Hospice for **Structural Measure** data submission = **2.5 hours/yr**  
**150 minutes/year** (See Exhibit A)
- Average time spent by each Hospice for **NQF #0209 Pain Measure** Submission = **178.5 hours/year**  
**10,710 minutes/year** (See Exhibit B)

#### **CALCULATION OF ESTIMATED ANNUAL HOUR BURDEN:**

##### **STRUCTURAL MEASURE**

- **150** minutes per each Hospice per year for submission of Structural Measure data x **3632** Hospices in U.S. = **544,800** minutes per ALL Hospice/year for Structural Measure data submission
- **544,800** minutes per ALL Hospices per year for Structural Measure divided by **60** minutes/hour = **9080** hours for ALL Hospices per year for each Structural Measure data submission.

##### **NQF #0209 PAIN MEASURE**

- **10,710** minutes per each Hospice per year for submission of NQF# 0209 Measure data x **3632** Hospices in U.S. = **38,898,720** minutes per ALL Hospice/year for NQF #0209 Measure data submission
- **38,898,720** minutes per ALL Hospices per year for submission of NQF# 0209 Measure data divided by 60 minutes/hour = **648,312** hours for ALL Hospices per year for each NQF #0209 Pain Measure data submission.

##### **BOTH MEASURES:**

**9080** hours for ALL Hospices per year for each Structural Measure data submission.

**648,312** hours for ALL Hospices per year for each NQF #0209 Pain Measure data submission.

**657,392** hours for ALL Hospices per year for submission of ALL Quality Measure data

## **Exhibit B – Burden Calculation from 2013 Hospice Rule PRA Package**

### **Hospice Quality Reporting Program Burden Calculations** **Page Two**

#### **Cost/Wage Calculation:**

Estimate of the average time spent by each Hospice provider per year for submission of Hospice Quality Reporting Program data = **181** hours. The cost burden for the submission of quality data is itemized as followed (further itemization is provided in Exhibits a & B)

| <b>Job Description</b>          | <b>Measure</b> | <b>Time Spent per year</b>  | <b>Average Hourly Rate of Pay</b> | <b>Cost/Wage Calculation</b>         |
|---------------------------------|----------------|-----------------------------|-----------------------------------|--------------------------------------|
| <b>Administrative Assistant</b> | NQF#0209       | 178.5 hours<br>(10,710 min) | \$16.66                           | \$2,973.81                           |
|                                 | QAPI measure   | 70 min                      | \$16.66                           | \$ 19.43                             |
| <b>Registered Nurse</b>         | QAPI measure   | 80 min                      | \$33.23                           | \$ 44.30                             |
| <b>TOTAL</b>                    |                | 181 hours<br>(10,860 min)   |                                   | <b>\$3,037.54</b><br><b>Per year</b> |

**\$3,038\* - Total Annualized Cost To Each Hospice Providers**

**\$11,034,016\* - Total Annualized Cost To ALL Hospice Providers**

\$3,038\* per Hospice per year x 3632 Hospices in the U.S. = **\$11,034,016\***

Estimated Average Annual Cost / Provider = **\$3,038\***  
(**\$11,034,016\*** / 3632 Hospices)

Estimated Average Yearly Cost per submission of all QRP data for each Hospice = **\$1,519\***  
(**\$11,034,016\*** / 7,264 submissions)

Estimated Actual Yearly Cost per Hospice for Submission of Structural Measure Data: **\$63.73\***

Estimated Actual Yearly Cost per Hospice for Submission of NQF #0209 Measure Data: **\$2,973.81\***

**\*NOTE: For purposes of total annualized cost calculations, all numerical figures have been rounded up or down to the nearest whole number.**

## Exhibit B – Burden Calculation from 2013 Hospice Rule PRA Package

### Exhibit A

#### Time Estimates for Reporting of the Structural / QAPI Measure By Each Individual Hospice Provider

| <b>Activity</b>   | <b>Time</b>   | <b>Frequency of Activity</b> | <b>Job description of person(s) who perform this task</b>   | <b>Average Hourly Wage</b>   |
|---|---|------------------------------|---|--|
| Download and read User Guide  | 60 minutes  | One time only *              | Administrative Assistant  | <b>\$16.66 x 60 min./yr.<br/>=\$16.66 per year</b>   |
| Refer to users guide while entering data for submission   | 20 minutes  | Once yearly per submission   | Registered Nurse (R.N.)   | <b>\$33.23 x 20 min./yr.<br/>=\$11.07 per year</b>   |
| Create web account/login on CMS website   | 10 minutes  | One time only*               | Administrative Assistant  | <b>\$16.66 x 10 min./yr.<br/>=\$2.78 per year</b>  |
| Gather/review QAPI program documentation of indicators used in Q4 2012, map to dropdown structure in the User Guide | 30 minutes  | Once yearly per submission   | Registered Nurse (R.N.)   | <b>\$33.23 x 30 min./yr.<br/>=\$16.61 per year</b>   |
| Login and enter data for structural measures using dropdowns  | 30 minutes  | Once yearly per submission   | Registered Nurse (R.N.)   | <b>\$33.23 x 30 min./yr.<br/>=\$16.61 per year</b>   |
| <b>Total</b>  | 70 minutes<br><u>80 minutes</u><br><b>150 minutes</b><br><b>(2.5 hours)</b> |                              | 80 minutes spent by R.N. @ hourly wage of \$33.23<br><br>70 minutes spent by Administrative Assistant @hourly wage of \$16.66 | <b>\$16.66</b><br><b>\$11.07</b><br><b>\$ 2.78</b><br><b>\$16.61</b><br><b>\$16.61</b><br><b>\$63.73</b> |

## **Exhibit B – Burden Calculation from 2013 Hospice Rule PRA Package**

### **Exhibit B**

#### **Time Estimates for Reporting of the NQF #0209 Pain Measure By Each Individual Hospice Provider**

| <b>Activity</b>   | <b>Time</b>  | <b>Frequency of Activity</b>  | <b>Job description of person(s) who perform this task</b> | <b>Average Hourly Wage</b>   |
|---|--|---|---|--|
| Refresher reading of User Guide*  | 30 minutes per Reporting Period<br><b>0.5 hours per year</b>   | One time only *   | Administrative Assistant                                  | <b>\$16.66 x 30 min./yr.<br/>= \$8.33 per year</b>   |
| Aggregate the clinical data for collection of the required data elements for NQF 0209 | 14 hours per month; <b>or</b><br>42 hours per quarter; <b>or</b><br><b>168 hours per year</b><br><b>(10,080 minutes/yr)</b>              | Once yearly per submission<br>(or may be done on a quarterly basis) | Administrative Assistant                                  | <b>\$16.66 x 14 hours/mo.<br/>= \$233.23</b><br><br><b>\$16.66 x 168 hrs/yr.<br/>= \$2,798.88 per year</b> |
| Login and enter the 7 data elements   | 0.83 hours per month; <b>or</b><br>2.5 hours per quarter; <b>or</b><br><b>10 hours per year</b><br><b>(600 minutes/yr)</b>               | Once yearly per submission<br>(or may be done on a quarterly basis) | Administrative Assistant                                  | <b>\$16.66 x 10 hours/yr.<br/>= \$166.60</b>   |
| <b>Total</b>  | 30 minutes @ \$16.66/hr<br>10,080 minutes @\$16.66/hr<br><u>600 minutes @\$16.66/hr</u><br><b>10,710 minutes</b><br><b>(178.5 hours)</b> |   |   | <b>\$8.33</b><br><b>\$2,798.88</b><br><b><u>\$166.60</u></b><br><b>\$2,973.81</b>                          |