

## **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

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### **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 (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 (10,860 min)		<b>\$3,037.54</b> <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. =\$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. =\$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. =\$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. =\$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. =\$16.61 per year</b>
<b>Total</b>	<b>70 minutes <u>80 minutes</u> <b>150 minutes (2.5 hours)</b></b>		80 minutes spent by R.N. @ hourly wage of \$33.23  70 minutes spent by Administrative Assistant @hourly wage of \$16.66	<b>\$16.66 \$11.07 \$ 2.78 \$16.61 <u>\$16.61</u> <b>\$63.73</b></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 <b>0.5 hours per year</b>	One time only *	Administrative Assistant	<b>\$16.66 x 30 min./yr. = \$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> 42 hours per quarter; <b>or</b> <b>168 hours per year</b> <b>(10,080 minutes/yr)</b>	Once yearly per submission (or may be done on a quarterly basis)	Administrative Assistant	<b>\$16.66 x 14 hours/mo. = \$233.23</b>  <b>\$16.66 x 168 hrs/yr. = \$2,798.88 per year</b>
Login and enter the 7 data elements	0.83 hours per month; <b>or</b> 2.5 hours per quarter; <b>or</b> <b>10 hours per year</b> <b>(600 minutes/yr)</b>	Once yearly per submission (or may be done on a quarterly basis)	Administrative Assistant	<b>\$16.66 x 10 hours/yr. = \$166.60</b>
Total	30 minutes @ \$16.66/hr 10,080 minutes @\$16.66/hr <u>600 minutes @\$16.66/hr</u> <b>10,710 minutes</b> <b>(178.5 hours)</b>			<b>\$8.33</b> <b>\$2,798.88</b> <b><u>\$166.60</u></b> <b>\$2,973.81</b>