

Supporting Statement for Portable X-Ray Supplier Request for Certification (CMS-1880)
and the Portable X-Ray Supplier Survey Report (CMS-1882).

BACKGROUND

This is a request for OMB approval (0938-0027) of the Centers for Medicare & Medicaid Services (CMS)-1880, Request for Certification as a Supplier of Portable X-ray Services and the CMS-1882, Medicare/Medicaid Portable X-ray Survey Report.

A. JUSTIFICATION

1. Need and Legal Basis

This activity is authorized by Title XVIII of the Social Security Act, Section 1861(s)(3). The collection of this information is authorized by 42 CFR Part 486.100-486.110 pursuant to Sections 1864 and 1871 of the Social Security Act. Section 1861(s)(3) requires that providers of Medicare services meet such requirements as the Secretary finds necessary to ensure the health and safety of individuals who are furnished services. For Medicare purposes, certification is based on the State survey agency's reporting of a provider's or supplier's compliance or noncompliance with the health and safety requirements published in regulations. To determine compliance with these requirements, the Secretary has authorized States through contacts to conduct surveys of health care providers.

The form CMS-1880, Request for Certification as a Supplier of Portable X-Ray Services under the Medicare program, is initially completed by the suppliers of portable X-ray services, expressing an interest in and requesting participation in the Medicare program. This form initiates the process of obtaining a decision as to whether the conditions of coverage are met as a portable X-ray supplier. It also promotes data reduction or introduction to, and retrieval from, the Certification and Survey Provider Enhanced Reporting (CASPER) by the CMS Regional Offices (ROs).

The survey report form CMS-1882 is an instrument used by the State survey agency to provide data collected during an on-site survey of a supplier of portable X-ray services to determine compliance with the applicable conditions of participation and to report this information to the Federal Government. The form is primarily a coding worksheet designed to facilitate data reduction and retrieval into the ASPEN system at the CMS ROs. The form includes basic information on compliance (i.e., met, not met, explanatory statements) and does not require any descriptive information regarding the survey activity itself. CMS has the responsibility and authority for certification decisions which are based on

supplier compliance with the applicable conditions of participation. The information needed to make these decisions is available to CMS only through the use of information abstracted from the survey report form.

2. Information Users

The information from this form will be used by CMS in making certification decisions. The information on the form serves as a screen for the State survey agency to determine if the portable X-ray supplier has the basic capabilities to participate in the Medicare program, and whether a survey is appropriate. The basic identifying information from this form is coded into ASPEN and serves as the information based for the creation of a record for future Federal certification and for monitoring activity.

3. Improved Information Technology

The certification form lists minimum criteria that must be met in order to be approved as a supplier of portable X-ray services for Medicare participation. The standardized format and simple checkbox method provide for consistent reporting by State survey agencies. Recording this information would be no easier for State surveyors using direct access equipment.

4. Duplication

The application and survey forms do not duplicate any information collection. The forms address specific requirements for certification as a portable X-ray supplier. State survey agencies conduct these reviews with Federal funds under contract with CMS. The survey form is a basic deliverable under these contracts and is the only one of its kind collected by CMS for portable X-ray suppliers. The survey form is the only standardized mechanism available for reporting the basic preliminary requirements for portable X-ray suppliers wishing to participate in the Medicare program.

5. Small Business

These information collection requirements do not affect small businesses.

6. Less Frequent Collection

Submission of the survey form is based on the frequency of portable X-ray supplier surveys. These surveys, in turn, depend on the frequency specifications of regulations and the availability of survey funds. Currently, 15 percent of Medicare-approved suppliers of portable X-ray

services are surveyed annually. All new applicants are surveyed as budgets within the State Agencies permit.

7. Special Circumstances

There are no special circumstances for this information collection.

8. Federal Register/Outside Consultation

The 60-day Federal Register notice published on November 17, 2014. There were no comments received from the public.

9. Payment/Gifts to Respondent

There are no payment/gifts to respondent.

10. Confidentiality

We do not pledge confidentiality.

11. Sensitive Questions

There are no questions of a sensitive nature associated with this form.

12. Estimate of Burden (Total Hrs. & Wages)

The portable X-ray supplier completes form CMS-1880 to request certification and during any subsequent survey. We estimate based on the simplicity of the form and past usage that it takes approximately 15 minutes to complete.

Read Instructions	5 minutes
Gather and Compile Data	5 minutes
Clerical Time	5 minutes
TOTAL TIME	15 minutes

We anticipate this form to be completed by the equivalent of an Administrative Services Manager at the portable x-ray supplier with a mean hourly wage \$43.36 based on the 2013 Bureau of Labor Statistics National Occupational Employment and Wage Estimates. There are approximately 86 surveys conducted annually. The annual hour burden is 22 hours and the annual cost to collect these forms is \$954.

The survey report form CMS-1882 is completed by a State surveyor upon request for approval and every seven years thereafter for recertification purposes. We estimate, based on the simplicity of the form and past

usage, that it takes approximately 1.50 hours to complete the form. We anticipate this form to be completed by the equivalent of a state examiner / investigator with a mean hourly wage \$27.11 based on the 2013 Bureau of Labor Statistics National Occupational Employment and Wage Estimates. We estimate the annual hour burden to be 129 hours and the annual cost to collect these forms is \$3497.

The total annual burden for both forms is 151 hours and \$4451.

13. Capital Costs of Burden

There are no capital costs of burden.

14. Federal Cost Estimates

All costs associated with form CMS-1882 are incurred by the Federal Government. Due to budget constraints, only 15 percent of the facilities are surveyed annually.

Number of facilities in the universe	579
Number of facilities surveyed	86
Contracting costs to complete form (\$27.11/hr)	\$3497
Printing and Distribution	<u>650</u>
TOTAL COSTS	\$4147

The costs associated with completion of form CMS-1880 is incurred by the portable X-ray supplier.

15. Changes in Burden/Program Changes

The number of portable x-ray suppliers and number of annual surveys has not changed since the previous submission. We have revised the hourly wage estimates to link the information to data from the Bureau of Labor Statistics National Occupational Employment and Wage Estimates. We believe this more accurately represents actual costs. This has resulted in the annual financial burden decreasing overall by \$1788. We have also separated the burden between the two forms. This was previously reported as single burden estimate.

16. Publication and Tabulation Dates

There are no publication and tabulation dates with this collection.

17. Expiration Date

CMS does not want to display the expiration date as this would impose an undue burden on CMS to update the form every 3 years.

18. Certification Statement

There are no exceptions to the certification statement.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

There are no statistical methods employed in this information collection.