EXHIBIT A – BURDEN CALCULATION WORKSHEET

PART 1. Time Burden

Estimated number of hospice admissions and Hospice Item Set record submissions

Total number of Medicare-participating hospices = **4,259**[1]

Total number of admissions to all hospices per year = **1,248,419**[2]
Total number of admissions to all hospices over three years = **3,745,257**

Estimated average number of admissions to each hospice:

- **per year:** **1,248,419** admissions to all hospices / **4,259** hospices = **293** admissions per hospice per year
- **per month:** **1,248,419** admissions to all hospices / **4,259** hospices / **12** months per year = **24** per month
- **over 3 years:** **3,745,257** admissions to all hospices over 3 years / **4,259** hospices = **879** per 3 years

Estimated average number of Hospice Item Set records submitted by all hospices

- **per year:** **1,248,419** admissions to all hospices per year x **2** Hospice Item Set records (1 Admission Record and 1 Discharge Record) per patient = **2,496,838** records per year
- **per month:** **2,496,838** Hospice Item Set records per all hospices per year / **12** months per year = **208,070** per month
- **over 3 years:** **2,496,838** Hospice Item Set records per all hospices per year x **3** years = **7,490,514** per 3 years

Estimated average number of Hospice Item Set records submitted by each hospice

- **per year:** **2,496,838** Hospice Item Set records per all hospices / **4,259** hospices = **586** records per hospice per year
- **per month:** **208,070** Hospice Item Set records per all hospices per month / **4,259** hospices = **49** per month
- **over 3 years:** **7,490,514** Hospice Item Set records per all hospices per 3 years / **4,259** hospices = **1,759** per 3 years

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[1] Quality Improvement and Evaluation System (QIES) List of Hospice Providers, January 2016

[2] The discharge number was calculated using the number of HIS discharge assessments submitted October 1, 2014 – September 30, 2015.

PART 2.   Cost/Wage Calculation

Note that this worksheet presents rounded inputs for each calculation. The actual calculations were performed using unrounded inputs, so the outputs of each equation below may vary slightly from what would be expected from the rounded inputs.

Time required to complete each Hospice Item Set record

14 minutes nursing/clinical staff time to abstract data for Admission Record – paid @ **$67.10/hr.**[3]

    9 minutes nursing/clinical staff time to abstract data for Discharge Record – paid @ **$67.10/hr.**

    5 minutes administrative/clerical staff time to upload Assessment Record data – paid @ **$32.24/hr.**[4]

    5 minutes administrative/clerical staff time to upload Discharge Record data – paid @ **$32.24/hr**.

Nursing Time:
- **23** minutes x **293** Hospice Item Sets per each hospice per year / **60** minutes per hour = **112.36** nursing hours per each hospice per year
- **112.36** hours per year x **$67.10** per hour = **$7,539.66** nursing wages per each hospice per year
- **$7,539.66** per each hospice per year x **4,259** hospice providers = **$32,111,417.38** nursing wages per all hospices per year
- **$7,539.66** per each hospice per year x **3** years = **$22,618.98** nursing wages per each hospice over 3 years
- **$32,111,417.38** per all hospices per year x **3** years = **$96,334,252.13** nursing wages for all hospices over 3 years

Administrative Assistant Time:
- **10** minutes x **293** Hospice Item Sets per each hospice per year / **60** minutes per hour = **48.85** administrative/clerical hours per each hospice year
- **48.85** hours per year x **$32.24** per hour = **$1,575.06** administrative/clerical wages per each hospice per year
- **$1,575.06** per each hospice per year x **4,259** hospice providers = **$6,708,171.43** administrative/clerical wages per all hospices per year
- **$1,575.06** per each hospice per year x **3** years = **$4,725.17** administrative/clerical wages per each hospice over 3 years
- **$6,708,171.43** per all hospices per year x **3** years = **$20,124,514.28** administrative/clerical wages per each hospice over 3 years

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[3] The adjusted hourly wage of $67.10 per hour for a Registered Nurse was obtained using the mean hourly wage from the U.S. Bureau of Labor Statistics, $33.55. This mean hourly wage is adjusted by a factor of 100 percent to include fringe benefits. See http://www.bls.gov/oes/current/oes291141.htm

[4] The adjusted hourly wage of $32.24 per hour for a Medical Secretary was obtained using the mean hourly wage from the U.S. Bureau of Labor Statistics, $16.12. This mean hourly wage is adjusted by a factor of 100 percent to include fringe benefits. See http://www.bls.gov/oes/current/oes436013.htm

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Total annualized cost to each hospice provider:

$7,539.66   Nursing wages per each hospice per year

$1,575.06   Administrative assistant wages per each hospice per year

$9,114.72   **Total**

Total annualized cost to all hospice providers:

$32,111,417 Nursing wages per all hospice providers per year

$6,708,171   Administrative assistant wages per all hospice providers per year

$38,819,589   **Total**

Total 3-year cost to each hospice provider:

$22,618.98   Nursing wages per each hospice over 3 years

$4,725.17   Administrative assistant wages per each hospice over 3 years

$27,344.16   **Total**

Total 3-year cost to all hospice providers:

$96,334,252 Nursing wages per all hospice providers over 3 years

$20,124,514 Administrative assistant wages per all hospice providers over 3 years

$116,458,766 **Total**

PART 3. Additional Calculations:

Average monthly cost to each individual hospice provider:

- **$38,819,589** for all Hospices per year / **4,259** hospices / **12** months per year = **$759.56**

Cost to provider per each individual hospice patient:

- **$38,819,589** for all hospices per year / **1,248,419** Hospice Item Sets per year = **$31.10**

EXHIBIT A –BURDEN CALCULATION WORKSHEET

Appendix 1: Hourly Time and Wage Burden Calculation Detail

Hospice Quality Reporting Program
Time and Wage Burden Itemization

Record Type	Number of Questions	Time Required To Complete Questions	Staff Wages for Questions
Admission Record	48	14 min – Nursing/Clinical time 0.3 min. per item x 48 items	14 min. x $67.10/hr.= $15.66
		5 min – Admin/Clerical time (to upload data)	5 min. x $32.24/hr. = $2.69
Discharge Record	29	9 min– Nursing/Clinical time (0.3 min. per item x 29 items)	9 min. x $67.10/hr. = $10.07
		5 min – Admin/Clerical time (to upload data)	5 min. x $32.24/hr. =$2.69
Totals	77	33 minutes	Total cost per patient = $31.10

Appendix 2: Alternative Method of Calculating Burden for the Hospice Data Item Set

Burden Estimate Based on Hospice Size

Estimated annual time burden per each hospice based on hospice size

- **100** annual admissions x **33** minutes per Hospice Item Set = **3300** minutes / **60** minutes per hour = **55** hours per each hospice with 100 annual admissions
- **500** annual admissions x **33** minutes per Hospice Item Set = **16,500** minutes / **60** minutes per hour = **275** hours per each hospice with 500 annual admissions
- **2,500** annual admissions x **33** minutes per Hospice Item Set = **82,500** minutes / **60** minutes per hour = **1,375** hours per each hospice with 2,500 annual admissions

Estimated average annual cost to each hospice provider for reporting quality data based on hospice size

- **100** annual admissions x **$31.10** per each Hospice Item Set record submission = **$3,110** per each hospice with 100 annual admissions
- **500** annual admissions x **$31.10** per each Hospice Item Set submission = **$15,550** per each hospice with 500 annual admissions
- **2,500** annual admissions x **$31.10** per each Hospice Item Set submission = **$77,750** per each hospice with 2,500 annual admissions

Appendix 3: Burden Information Obtained From Limited Pilot Testing In Various Sizes and Types of Hospices

Itemized Time and Wage/Cost Burden Estimate for the Hospice Item Set Records:

The Hospice Item Set consists of 2 different types of records.

Admission
- A hospice is required to complete and submit an Admission Record within 14 days after the patient is admitted.
- The following Admission Record time estimates are taken from the 2012 HIS pilot of HIS v1.00.0. HIS v2.00.0 includes 3 additional items, and time estimates for these items was not collected for these new items during the 2015 HIS pilot.

Hospice Item Set Pilot Time Estimates – Admission Record

Hospice	Total (minutes)
A	18.3
B	22.5
C	7.6
D	9.3
E	17.7
F	21.5
G	14.4
H	7.6
J	9.3
Total	14.1

Top 5% removed as outliers.

- Using an estimate of 0.3 minutes per item, the total time for HIS v2.00.0 is estimated to be:
  14.1 minutes + (3 items * 0.3 minutes) = 15 minutes for HIS Admission Record

Discharge
- A hospice must also complete and submit a Discharge Record within 7 days after the patient is discharged.
- The following Discharge Record time estimates are taken from the 2015 HIS pilot, which included versions of the HIS v2.00.0 items.

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Hospice Item Set Pilot Time Estimates – Discharge Record

Hospice	Total (minutes)
A	4.6
B	13.7
C	4.3
E	10.2
F	8.7
G	4.8
H	8.9
J	17.5
K	13.5
L	7.7
M	14.6
Total	9.5

Top 5% removed as outliers.

- Using these Admission and Discharge record time estimates, the total time burden per patient is 24.5 minutes of Nursing/Clinical time.

Appendix 4: Change in Burden Table

Change In Burden From Prior 2013 PRA Package Burden Estimate & the Current Hospice Item Set PRA Package Burden Estimate

Type of Calculation	Prior 2013 Hospice PRA Package	Current Hospice Item Set PRA Package	Change in Burden
Per Each Hospice	$3,818.26	$9,114.72	+ $5,296.46
Per All Hospices	$14,287,929	$38,819,589	+ $24,531,660