

## **Supporting Statement A**

### **Request For Certification As Supplier Of Portable X-Ray Services Under The Medicare/Medicaid Program (CMS-1880)**

#### **A. BACKGROUND**

This is a request for revisions to form CMS-1880, titled “*Request for Certification as Supplier of Portable X-Ray Services under the Medicare/Medicaid Program.*” This data collection is approved under OMB control number 0938-0027.

The CMS-1880 form is completed by the suppliers of portable X-ray services when they request initial participation in the Medicare program. The CMS-1880 form initiates the process of obtaining a decision as to whether the conditions of coverage are met by the portable X-ray supplier seeking Medicare participation. 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 CMS-1880 form is also completed by current Medicare participating portable x-ray supplier during each recertification survey. These surveys are performed by the State Survey Agency, who also provides the CMS-1880 form to the portable x-ray supplier at the time of the survey.

#### **B. JUSTIFICATION**

##### **1. Need and Legal Basis**

This activity is authorized by Title XVIII of the Social Security Act, Section 1861(s) (3) which 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 to conduct surveys of health care providers.

This data collection is authorized by 42 CFR Part 486.100-486.110 (the Conditions of Coverage for Portable X-ray Services), pursuant to Sections 1864 and 1871 of the Social Security Act. The CMS-1880 form implements the requirements set forth at 42 CFR 486.100-486.110,

##### **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

## **Supporting Statement A**

### **Request For Certification As Supplier Of Portable X-Ray Services Under The Medicare/Medicaid Program (CMS-1880)**

information from this form is coded into ASPEN and serves as the information base for the creation of records 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.

#### **5. Small Business**

Although, portable x-ray suppliers may qualify as a small business, these information collection requirements do not place excessive burden on small businesses. Also, the completion of the CMS-1880 form is mandatory in order for a portable x-ray supplier to obtain its initial Medicare certification and subsequent periodic recertification.

#### **6. Less Frequent Collection**

The form is required to be completed once upon request to participate in the Medicare program and every three years thereafter when the portable x-ray supplier receives its recertification survey.

#### **7. Special Circumstances**

There are no special circumstances for this information collection.

## **Supporting Statement A**

### **Request For Certification As Supplier Of Portable X-Ray Services Under The Medicare/Medicaid Program (CMS-1880)**

#### **8. Federal Register/Outside Consultation**

The 60-day Federal Register notice published on April 27, 2021 (86 FR 22210).  
There were no public comments received.

The 30-day Federal Register notice published on August 13, 2021 (86 FR 44730).

#### **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)**

##### **a. Time and Cost Burden For Completion of CMS-1880 by New Portable x-ray suppliers**

Form CMS-1880 is completed by new portable x-ray suppliers when they first apply for participation in the Medicare program (i.e., at initial certification). We estimate that there are an average of 20 new portable x-ray suppliers established each year. This estimate is an average of the number of new portable x-ray suppliers established between 2016 and 2020 (see the chart below), as identified by the CMS Survey & Certification Quality, Certification & Oversight (S&C QCOR) system. This system contains information about the numbers of new and active Medicare-certified providers and suppliers of each type as well as certification information about these providers and suppliers. This information is provided not only for the current time period but also for each year back to 2010.

### Supporting Statement A

#### Request For Certification As Supplier Of Portable X-Ray Services Under The Medicare/Medicaid Program (CMS-1880)

<b>Calendar Year</b>	<b>Number of New Portable x-ray suppliers</b>
<b>2016</b>	<b>16</b>
<b>2017</b>	<b>11</b>
<b>2018</b>	<b>23</b>
<b>2019</b>	<b>26</b>
<b>2020</b>	<b>25</b>
Total number of new portable x-ray suppliers established between 2016 – 2022	<b>101</b>
Average number of new portable x-ray suppliers established between 2016 – 2020 (101 / 5 = 20.2)	<b>20</b>

We estimate that it would take approximately 15 minutes (0.25 hour) for **each** new portable x-ray supplier to complete the CMS-1880 form. We further estimate that the total annual time burden **across all new** portable x-ray suppliers per year would be **5 hours**.

- 15 minutes per each CMS-1880 x 20 new portable x-ray suppliers per year = 300 minutes per year
- 300 minutes per year divided by 60 minutes per hour = 5 hours per year

We believe that the person at the portable x-ray supplier's facility who would complete the CMS-1880 form would have a management position. We believe that this management position would fall under the U.S. Bureau of Labor Statistics' job category of Medical and Health Services Manager. According to the U.S. Bureau of Labor Statistics, the mean hourly wage for this job is \$55.37 (<https://www.bls.gov/oes/current/oes119111.htm>). This wage, adjusted to account for the employer's overhead and fringe benefits, would be \$110.74.

We estimate that the cost burden for the completion of the CMS-1880 by **each new** portable x-ray supplier would be **\$27.69**.

- \$110.74 divided by 60 minutes = \$1.846 (per 1 minute)

## Supporting Statement A

### Request For Certification As Supplier Of Portable X-Ray Services Under The Medicare/Medicaid Program (CMS-1880)

- \$1.846 per 1 minute x 15 minutes = \$27.69 (per 15 minutes)

We further estimate that the total annual cost **across all new** portable x-ray suppliers per year would be **\$553.70**.

- \$110.74 per hour x 5 hours = \$553.70

#### **b. Time and Cost Burden For Completion of CMS-1880 by Existing Portable x-ray suppliers**

The CMS-1880 form is also completed by existing portable x-ray suppliers at the time of their recertification surveys, to update their certification information. Currently, there are 505 existing portable x-ray suppliers in the U.S. We obtained this information from the CMS S&C QCOR system.

Portable x-ray suppliers are surveyed by the State Survey Agencies every 6 years. Therefore, we estimate that the State Survey Agencies would survey approximately **84** portable x-ray suppliers per year (505 divided by 6 = 84).

We estimate that it would take approximately **15 minutes** to complete the CMS-1880 form by **each** of the existing portable x-ray supplier being surveyed each year. We further estimate that the total annual time burden **across all** existing portable x-ray suppliers per year would be **21 hours**.

- 15 minutes per each CMS-1880 x 84 existing portable x-ray suppliers surveyed/year = 1,260 min.
- 1,260 minutes divided by 60 minutes per hour = 21 hours

We believe that the person who would complete the CMS-1880 form would have a management job at the portable x-ray supplier that would fall under the U.S. Bureau of Labor Statistics job category of Medical and Health Services Manager. According to the U.S. Bureau of Labor Statistics, the mean hourly wage for this job is \$55.37 (<https://www.bls.gov/oes/current/oes119111.htm>). This wage, adjusted to account for the employer's overhead and fringe benefits, would be \$110.74.

We estimate that the cost burden for completion of the CMS-1880 by **each** existing portable x-ray supplier being surveyed would be **\$27.69**.

- \$110.74 divided by 60 minutes = \$1.846 per minute

## Supporting Statement A

### Request For Certification As Supplier Of Portable X-Ray Services Under The Medicare/Medicaid Program (CMS-1880)

- \$1.846 per minute x 15 minutes = \$27.69

We further estimate that the total annual cost across *all existing portable x-ray suppliers* per year would be **\$2,325.54**.

- \$110.74 per hour x 21 hours = \$2,325.54

#### **c. Summary of Time and Cost Burdens Associated with Form CMS-1880**

Time burden for completion of CMS-1880 - each new PXR supplier	15 min.
<u>Time burden for completion of CMS-1880 - each existing PXR supplier</u>	<u>15 min.</u>
<b>TOTAL</b>	<b>30 min.</b>

Time burden for completion of CMS-1880 form - all new PXR suppliers	5 hours
<u>Time burden for completion of CMS-1880 form - all existing PXR suppliers</u>	<u>21 hours</u>
<b>TOTAL</b>	<b>26 hours</b>

Cost burden for completion of CMS-1880 - each new PXR supplier	\$27.69
<u>Cost burden for completion of CMS-1880 - each existing PXR supplier</u>	<u>\$27.69</u>
<b>TOTAL</b>	<b>\$55.38</b>

Cost burden for completion of CMS-1880 form - all new PXR suppliers	\$ 553.70
<u>Cost burden for completion of CMS-1880 form - all existing PXR suppliers</u>	<u>\$2,325.54</u>
<b>TOTAL</b>	<b>\$2,879.24</b>

#### **13. Capital Costs of Burden**

There are no capital costs of burden.

#### **14. Federal Cost Estimates**

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

#### **15. Changes in Burden/Program Changes**

### Supporting Statement A

#### Request For Certification As Supplier Of Portable X-Ray Services Under The Medicare/Medicaid Program (CMS-1880)

There has been an increase in the time and cost burden from the last PRA package submission, as shown in the table below:

Description of Burden	Total Requested	Due to Adjustment in OPDIV/Office Estimate	Currently Approved
a. Annual Responses for CMS-1880 completed by <b>new</b> PXR suppliers	20 annual responses	+20 annual responses	0 annual responses
b. Annual Responses for CMS-1880 completed by <b>existing</b> PXR suppliers	84 annual responses	-2 annual responses	86 annual responses
c. Annual time burden across <b>all new</b> PXR supplier for completion of the CMS-1880 forms	5 hours	+5 hours	0 hours
d. Annual time burden across <b>all existing</b> PXR supplier for completion of the CMS-1880 forms	21 hours	-1 hours	22 hours
e. Annual cost burden across <b>all new</b> PXR supplier for completion of the CMS-1880 forms	\$553.70	+\$553.70	\$0
f. Annual cost burden across <b>all existing</b> PXR supplier for completion of the CMS-1880 forms	\$2,325.54	+\$1,303.00	\$1,022.54
<b>Total Annual Responses</b>	<b>104</b>	<b>+18</b>	<b>86</b>
<b>Total Hour Burden</b>	<b>26 hours</b>	<b>+4 hours</b>	<b>22 hours</b>
<b>Total Cost Burden</b>	<b>\$2,879.24</b>	<b>+\$1,856.70</b>	<b>\$1,022.54</b>

The annual time burden has increased by 4 hours and the annual cost burden has increased by \$1,856.70. These are minimal increases that can be explained by several factors.

## **Supporting Statement A**

### **Request For Certification As Supplier Of Portable X-Ray Services Under The Medicare/Medicaid Program (CMS-1880)**

First, we believe that the time and cost burden was underestimated in the previous PRA package in several ways. First, a mathematical error was made in the calculation of the cost burden that lead to the underestimation of the cost burden by -\$23.87.

Second, the writer of the previous PRA package did not include the time and cost burdens associated with the CMS-1880 forms completed by new portable x-ray suppliers seeking initial participation in the Medicare program. According to the S&C QCOR system, in 2017, 11 new portable x-ray suppliers were established that would have been required to complete the CMS-1880 form. However, this burden was not considered nor included in the previous PRA package burden calculations.

In addition, in the previous PRA package the hourly wage rate used was \$47.56. But, in the current PRA package, we used the current hourly wage rate of \$55.37, quoted by the U.S. Bureau of Labor Statistics for the job position of “Medical and Health Services Manager” (<https://www.bls.gov/oes/current/oes119111.htm>). This increase of \$7.81 in the base hourly wage rate has resulted in an increase in the cost burden.

Also, in the previous PRA package, the cost burden was underestimated by 50% because the writer of the PRA package did not double the hourly wage rate of \$47.56 to \$95.12, as required, to account for the employer’s overhead and fringe benefits. This practice is required by OSORA when preparing a PRA package burden calculation.

In the current PRA package, we have doubled the current hourly wage of \$55.37 to \$110.74 to account for the employer’s overhead and fringe benefits. This increase in the wage rate used has contributed to the remainder of the increased cost burden.

#### **16. Publication and Tabulation Dates**

There are no publication and tabulation dates with this collection.

#### **17. Expiration Date**

CMS will display the OMB expiration date.

#### **18. Certification Statement**

There are no exceptions to the certification statement.



**Supporting Statement A**

Request For Certification As Supplier Of Portable X-Ray Services  
Under The Medicare/Medicaid Program (CMS-1880)

**C. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL  
METHODS**

There are no statistical methods employed in this information collection.