CMS Manual System	Department of Health & Human Services (DHHS)
Pub 100-04 Medicare Claims Processing	Centers for Medicare & Medicaid Services (CMS)
Transmittal 11900	Date: March 13, 2023
	Change Request 12820

Transmittal 11729 issued December 06, 2022, is being rescinded and replaced by Transmittal 11900, dated, March 13, 2023, to remove Chapter 3 Addendum A - Provider Specific File (PSF), of which, should not have been included with this instruction. All other information remains the same.

SUBJECT: Implementation of Rural Emergency Hospital (REH) Provider Type

I. SUMMARY OF CHANGES: The purpose of this change request (CR) is to provide the background, policy, and contractor instructions to test and implement the enrollment, billing, and payment for Rural Emergency Hospitals, effective January 1, 2023.

EFFECTIVE DATE: January 1, 2023 *Unless otherwise specified, the effective date is the date of service. **IMPLEMENTATION DATE: January 3, 2023**

Disclaimer for manual changes only: The revision date and transmittal number apply only to red italicized material. Any other material was previously published and remains unchanged. However, if this revision contains a table of contents, you will receive the new/revised information only, and not the entire table of contents.

II. CHANGES IN MANUAL INSTRUCTIONS: (N/A if manual is not updated) R=REVISED, N=NEW, D=DELETED-*Only One Per Row.*

R/N/D	CHAPTER / SECTION / SUBSECTION / TITLE	
R	4/10/10.6.1 - TOC	
D	4/10/10.6.4 - TOC	
N	4/10/10.6.4 - Payment Adjustment for Rural Emergency Hospitals	
R	4/50/50.1- Outpatient Provider Specific File	

III. FUNDING:

For Medicare Administrative Contractors (MACs):

The Medicare Administrative Contractor is hereby advised that this constitutes technical direction as defined in your contract. CMS does not construe this as a change to the MAC Statement of Work. The contractor is not obligated to incur costs in excess of the amounts allotted in your contract unless and until specifically authorized by the Contracting Officer. If the contractor considers anything provided, as described above, to be outside the current scope of work, the contractor shall withhold performance on the part(s) in question and immediately notify the Contracting Officer, in writing or by e-mail, and request formal directions regarding continued performance requirements.

IV. ATTACHMENTS:

Business Requirements Manual Instruction

Attachment - Business Requirements

Pub. 100-04	Transmittal: 11900	Date: March 13, 2023	Change Request: 12820

Transmittal 11729 issued December 06, 2022, is being rescinded and replaced by Transmittal 11900, dated, March 13, 2023, to remove Chapter 3 Addendum A - Provider Specific File (PSF), of which, should not have been included with this instruction. All other information remains the same.

SUBJECT: Implementation of Rural Emergency Hospital (REH) Provider Type

EFFECTIVE DATE: January 1, 2023 *Unless otherwise specified, the effective date is the date of service. **IMPLEMENTATION DATE: January 3, 2023**

I. GENERAL INFORMATION

A. Background: Section 125 of the Consolidated Appropriations Act, 2021 ("CAA, 2021"), Division CC establishes Medicare Payment for emergency hospital services, observation services, and other services as defined by the Secretary furnished by a Rural Emergency Hospital (REH) on or after January 1, 2023, by amending section 1861 of the Social Security Act ("the Act") to add new subsection (kkk) "Rural Emergency Hospital Services" and section 1834 of the Act to add new subsection (x) "Payment for Rural Emergency Hospital Services." The purpose of this Change Request (CR) is to implement the system requirements for this new Part A provider type, including payment for a January 2023 implementation CR.

B. Policy: Section 125 of the CAA, 2021, Division CC, defines an REH as a facility that: Is enrolled in the Medicare program; does not provide any acute care inpatient services (other than post-hospital extended care services furnished in a distinct part unit licensed as a Skilled Nursing Facility (SNF)); has a transfer agreement in effect with a level I or level II trauma center; meets certain licensure requirements; meets requirements to be a staffed emergency department; meets staff training and certification requirements established by the Secretary; and meets Conditions of Participation (CoPs) applicable to Critical Access Hospitals (CAHs) with respect to emergency services and, as determined applicable by the Secretary, to hospital emergency departments. CAHs and small rural hospitals that convert to REHs may furnish rural emergency hospital services for Medicare payment beginning in 2023.

Additionally, section 125 of the CAA, 2021, Division CC, states that REH services include emergency department services and observation services, and, at the election of the REH, other medical and health services furnished on an outpatient basis, as specified by the Secretary. The REH must also have a staffed emergency department 24 hours a day, 7 days a week, with staffing requirements similar to those for CAHs.

Starting on January 1, 2023, an REH that provides rural emergency hospital services (as defined in section 1861(kkk)(1) of the Act) will receive Medicare payment for those services pursuant to section 1834(x)(1) of the Act that reflects a 5 percent increase over the payment rate the provider would otherwise receive through the hospital outpatient prospective payment system (OPPS). Any co-payments for these services will be calculated based on the standard OPPS rate for the service excluding the 5 percent payment increase. An REH also may provide outpatient services that are consistent with the statutory requirements governing this provider type and the regulatory REH Conditions of Participations, that do not meet the definition of REH services. These services will be paid at the same rate the service would be paid if performed by a hospital outpatient department and paid under a fee schedule other than the OPPS. There is no payment increase for these services.

REHs will receive an additional facility payment pursuant to section 1834(x)(2) of the Act. The annual payment amount for 2023 will be determined based on the excess (if any) of the total amount that was paid to all CAHs in 2019 over the estimated total amount that would have been paid to CAHs in 2019 if payment were made for inpatient hospital, outpatient hospital, and skilled nursing facility services under the applicable prospective payment systems for such services during such year. This excess amount is divided

by the total number of CAHs in 2019. After the initial Medicare subsidy amount is calculated for calendar year 2023, the additional facility payments in subsequent years will be the payment amount determined for the preceding year increased by the hospital market basket percentage increase. REHs will receive these additional facility payments in twelve monthly installments. REHs also will be required to maintain detailed information as to how they have used these payments. The calendar year (CY) 2023 monthly REH facility payment is: \$272,866.

This CR implements payment to REHs effective for dates of service on or after January 1, 2023.

All institutional Rural Emergency Hospitals billing Medicare will be required to enroll with Medicare as a Rural Emergency Hospital and submit claims to the Part A Medicare Administrative Contractor using an institutional claim form.

II. BUSINESS REQUIREMENTS TABLE

"Shall" denotes a mandatory requirement, and "should" denotes an optional requirement.

Number	Requirement	Re	espo	onsil	bilit	y				
			A/B		D		Sha			Other
		N	MA(C	M		Sys			
		•	В	Н	Е	M F	aint M		C C	
		A	в	н Н	М	г I	C		U W	
				Н	А	S	S	S	F	
					С	S				
12820.1	The Medicare Systems (e.g., Medicare claims	Х				Х				BCRC, BCRS,
	processing systems, state systems, financial systems,									CERT, FPS,
	etc.) shall make the necessary changes to accept the following provider range as part of the CCN for Rural									HIGLAS, MAS, PECOS,
	Emergency Hospitals. The provider range is listed									PS&R, QIES,
	below:									RAC
	0001 through 0879									
	NOTE: Provider Type "24" is to be a valid provider									
	type for Rural Emergency Hospital (REH) providers.									
12820.2	Contractors shall accept CMS-855A submissions with	X								
	the provider type "Other" option selected, specifying									
	"Rural Emergency Hospital" until the forms can be									
	updated with the new provider type.									
12820.3	PECOS shall begin sending enrollment records for the									PECOS
	new Provider Type to FISS in the FISS extract with									
	the implementation of the January 2023 quarterly									
	release. The new Provider Type shall appear in									
	PECOS as follows:									
	"Rural Emergency Hospital (REH)" with Provider									
	Type code "24".									

Number	Requirement	Re	esno	nsi	bilit	v				
			A/B		D	Ĩ.	Sha	red-		Other
		N	MA	С	Μ		Sys	tem		
					Е	Μ	aint	aine	ers	
		Α	В	Η		F	Μ	V	С	
				Η	Μ	-		Μ	W	
				Η	A	S	S	S	F	
12020.4					C	S				
12820.4	Contractors shall process the PECOS records for the new "Rural Emergency Hospital (REH)" with Provider Type code "24".					Х				
12820.5	Contractors shall create a process that makes an additional, non-claims related monthly payment to REHs with a provider type 24 and no cancel date present in the provider file.					X				
	Note: The monthly payment amount will be 6 digits left of the decimal point in size. (i.e., \$999,999.99)									
12820.5.1	CMS shall send the value for the facility payment that is to be applied monthly for all REH providers.									CMS
12820.5.2	Contractors shall develop a new recurring process to apply and pay the annual monthly REH facility payment amount.					Х				CMS
12820.5.3	Contractors shall receive an annual recurring CR with the REH monthly facility payment rate and create a process to apply this rate each month on the remit for the last day of the month with an update on an annual basis, effective January 1, 2023.					X				CMS
12820.6	Contractors shall populate the REH monthly facility payment information on the Special Payments Aging Report.					X				
12820.7	Contractors shall populate the REH monthly facility payment information on the Remittance advice summary screen (MAP 07959).					Х				
12820.8	The Medicare Shared System Maintainer shall report the REH monthly facility payment with Payment Type Code 'RD' – "Rural Emergency Hospital (REH) Payment" to the Healthcare Integrated General Ledger Accounting System (HIGLAS) via HIGLAS FISS 810 Non-Claim interface.					X				HIGLAS
12820.9	HIGLAS shall process the Rural Emergency Hospital (REH) Non-Claim monthly facility payment and issue									HIGLAS

Number	Requirement	Responsibility								
			A/B MAC	5	D M E	1	Sha Syst aint	tem		Other
		A	В	H H H	M A C	F I S S	M C S		C W F	
	payment with 'HI' Fund.					~				
12820.10	HIGLAS shall define the new Sub Invoice Type for the Rural Emergency Hospital (REH) Payment type 'RD' as "RD_REH".									HIGLAS
12820.11	HIGLAS shall report the Rural Emergency Hospital (REH) monthly facility payments as listed below on 835 Interface:									HIGLAS
	PLB 0X-01 code – RD (HIGLAS 835 will report 'RD' as PLB code)									
	PLB 0X-02 (Positions 1 – 25) – AP Invoice Number									
	PLB 0X-02 (Positions 26 – 50) – Blank									
12820.12	The Medicare Shared System Maintainer shall make necessary programming changes to crosswalk the HIGLAS PLB code 'RD' to HIPAA PLB Code 'CS' (per attached crosswalk) for the remittance PLB Mapping.					X				HIGLAS
12820.13	Contractors shall use the payment date in BPR16 from the HIGLAS 835 file and populate 'REH Payment' in PLB03-2, Reference Identification field, when new PLB code "RD" is received from HIGLAS that maps to a HIPAA PLB code "CS".					X				HIGLAS
	Note: This is a Summary - Type 3 payment.									
12820.14	Contractors shall perform necessary Shared System internal HIGLAS changes to capture the information needed to support the Accredited Standards Committee (ASC) X12 835 Electronic Remittance Advice (ERA) and the standard paper remittance (SPR) sent to the provider.					X				
12820.14. 1	Contractors shall include the REH monthly payment on the HAFDHOOBR01 Provider Out of Balance Report.					X				
12820.15	Contractors shall allow provider type "24" on the outpatient provider specific file (OPSF) for REH providers. All other OPSF information remains as standard information required for completion of	X				X				

Number	Requirement	Re	espo	nsil	bilit	V				
		-	A/B MA(D M E	-	Sys	red- tem aine		Other
		A	В	H H H	M A C	F I S S	M C S		С	
	hospital provider types editing.									
12820.16	Contractors shall allow REH providers to bill outpatient services claims with Type of Bill (TOB) 013x and 014x . Inpatient hospital services are not allowed for REH providers.	X				Х				
12820.17	Contractors shall allow REH covered services to be paid at existing standard payment rates as identified by the Status Indicators under Outpatient Prospective Payment System (OPPS) plus a 5% increase for the REH providers. Current deductible rules apply. Current coinsurance rules apply, except coinsurance will not be calculated on the 5% payment increase.	X				X				OPPS Pricer
12820.17. 1	Contractors shall calculate payment for covered services processed by the OPPS Pricer with a 5% payment increase for the REH providers identified with provider type "24".									OPPS Pricer
12820.17. 2	Contractors shall calculate payment for covered services not processed by the OPPS Pricer with a Status Indicator (SI) of G or K with a 5% payment increase for the REH providers identified with provider type "24". Services paid at reasonable cost (SI=F or L) do not receive the 5% payment increase.					X				
12820.17. 3	Contractors shall separately capture the 5% payment increase for the REH providers and report the increase for items not paid with the OPPS Pricer on the ERA for balancing purposes as follows:					X				
	Group Code: CO									
	CARC: 172									
12820.17. 4	Contractors shall calculate payment for REH covered services that are manually priced for HCPCS code C9399 using their normal processes. FISS shall calculate the 5% payment increase.	X				X				
L		L	l	I			I	I		

Number	Requirement	Responsibility								
			А/В ИА(}	D M E	•	Sys	red- tem aine		Other
		A	В	H H H	M A C	F I S S	M C S	V M S	C W F	
12820.17. 5	Contractors shall ensure that the non-OPPS line-level 5% payment increase is passed to the downstream systems.					X				BCRC, IDR, PS&R
12820.17. 6	CWF shall ensure that the non-OPPS line-level 5% payment increase is passed to the downstream systems.								X	NCH
12820.18	Contractors shall create a new reason code to limit the billable TOBs to 13X and 14X for REH providers.					Х				
12820.19	Contractors shall ensure that an OPPS Flag "1" is sent on REH claims passed through the Integrated Outpatient Code Editor.					Х				
12820.20	OPPS Pricer shall not calculate Section 603 payment reductions for covered services processed for the REH providers identified with provider type "24".									OPPS Pricer
12820.21	PECOS, MACs, HIGLAS, and FISS shall participate in the UAT kick off call and twice a week UAT status calls. The UAT kick off call is scheduled on November 22, 2022 and UAT is scheduled between November 28 2022 and December 22, 2022.	X				X				HIGLAS, PECOS
	NOTE: FISS and HIGLAS participation is requested, but is optional.									
12820.22	FISS shall support MACs in PECOS UAT testing.					Х				
12820.23	Parties interested in attending the PECOS UAT calls shall send their names and email addresses to the following:	X				Х				HIGLAS, PECOS
	 Pamela Rumber - Pamela.rumber@cms.hhs.gov 									
	• Kusum Jha - Kusum.jha2@cms.hhs.gov									
12820.24	HIGLAS IBPR report shall show the REH 837 claims in line 5 of HOSPITALS. Line 5 is driven by the provider range and since these are mapped to provider									HIGLAS

Number	Requirement	Re	espo	nsil	bilit	y				
			MAC		D M E	M S		Shared- System Maintainers		Other
		A	В	H H H	M A C	F I S S	M C S	V M S		
	range 0001-0879 and these shall be included in total for HOSPITALS.									
12820.25	HIGLAS IBPR report shall show the REH 810 claims in Line 34 (Additional Providers Section as 34. B) as "REH facility payment/subsidy payments" and Line 36 shall show the Total including REH.									HIGLAS

III. PROVIDER EDUCATION TABLE

Number	Requirement	Re	espo	nsib	ility	
			A/B MA(D M E	C E D
		A	В	H H H	M A C	Ι
12820.26	Medicare Learning Network® (MLN): CMS will market provider education content through the MLN Connects® newsletter shortly after CMS releases the CR. MACs shall follow IOM Pub. No. 100-09 Chapter 6, Section 50.2.4.1 instructions for distributing the MLN Connects newsletter information to providers and link to relevant information on your website. You may supplement MLN content with your local information after we release the MLN Connects newsletter. Subscribe to the "MLN Connects" listserv to get MLN content notifications. You don't need to separately track and report MLN content releases when you distribute MLN Connects newsletter content per the manual section referenced above.	X				

IV. SUPPORTING INFORMATION

Section A: Recommendations and supporting information associated with listed requirements: N/A

"Should" denotes a recommendation.

X-Ref	Recommendations or other supporting information:
Requirement	
Number	

Section B: All other recommendations and supporting information: N/A

V. CONTACTS

Pre-Implementation Contact(s): Yvonne Young, 410-786-1886 or yvonne.young@cms.hhs.gov (Part A claims processing), Josh McFeeters, 410-786-9732 or joshua.mcfeeters@cms.hhs.gov (REH payment policy)

Post-Implementation Contact(s): Contact your Contracting Officer's Representative (COR).

VI. FUNDING

Section A: For Medicare Administrative Contractors (MACs):

The Medicare Administrative Contractor is hereby advised that this constitutes technical direction as defined in your contract. CMS does not construe this as a change to the MAC Statement of Work. The contractor is not obligated to incur costs in excess of the amounts allotted in your contract unless and until specifically authorized by the Contracting Officer. If the contractor considers anything provided, as described above, to be outside the current scope of work, the contractor shall withhold performance on the part(s) in question and immediately notify the Contracting Officer, in writing or by e-mail, and request formal directions regarding continued performance requirements.

ATTACHMENTS: 1

	HIGLAS PLB X-01 code	Code Meaning - HIGLAS	Previous FISS	Previous MCS	Previous VMS	HIPAA PLB Codes for	ASC X12 835 PLB Code Description	<u>Comments</u>
			835 PLB Code	835 PLB Code	<u>835 PLB</u> <u>Code</u>	<u>835 v40101 and v5010</u>		
			<u>Usage</u>	<u>Usage</u>	Usage	A1- PLB03-1		
1	93	935 Cross Reference Netting	WO			FB/WO	Forward Balancing/Overpayment Recovery	Follow CR 6870 - for using FB and WO at step I and Step II
2	94	935 Relationship Netting	WO			FB/WO	Forward Balancing/Overpayment Recovery	Follow CR 6870 - for using FB and WO at step I and Step II
3	95	935 Settlement Cross Reference Netting	WO			FB/WO	Forward Balancing/Overpayment Recovery	Follow CR 6870 - for using FB and WO at step I and Step II
4	96	935 Settlement Relationship Netting	WO			FB/WO	Forward Balancing/Overpayment Recovery	Follow CR 6870 - for using FB and WO at step I and Step II
5	A1	Provider Awardee Convener Model 1 BPCI Transaction (does NOT own Episode Initiators)				LE/WU	Levy/Unspecified Recovery	CR8440
6	A2	Provider Awardee Convener Model 2 BPCI Transaction (does NOT own Episode Initiators)				LE/WU	Levy/Unspecified Recovery	CR8440
7	A3	Provider Awardee Convener Model 3 BPCI Transaction (does NOT own Episode Initiators)				LE/WU	Levy/Unspecified Recovery	CR8440
8	A4	Provider Awardee Convener Model 4 BPCI Transaction (does NOT own Episode Initiators)				LE/WU	Levy/Unspecified Recovery	CR8440
9	AA	PIP CAP PT	CV			CV	Capital Passthrough	PIP Capital Passthrough
10	AB	non-PIP CAP PT	CV			CV	Capital Passthrough	non-PIP Capital Passthrough
11	AC	PIP DME PT	DM			DM	Direct Medical Education Passthrough	PIP Direct Medical Education
12	AD	non-PIP DME PT	DM			DM	Direct Medical Education Passthrough	non-PIP Direct Medical Education
13	AE	PIP Kidney PT	OA			OA	Organ Acquisition Passthrough	PIP Kidney
14	AF	non-PIP Kidney PT	OA			OA	Organ Acquisition Passthrough	non-PIP Kidney
15	AG	PIP Bad Debt PT	BD			BD	Bad Debt Adjustment	PIP Bad Debt Adjustment
16	AH	non-PIP Bad Debt PT	BD			BD	Bad Debt Adjustment	Non-PIP Bad Debt Adjustment
17	AL	PIP non-Phy Anest PT	LS			LS	Lump Sum	PIP Non-Physician Anesthetists
18	AM	non-PIP non-Phy Anest PT	LS			LS	Lump Sum	non-PIP Non-Physician Anesthetists
19	AN	PIP ROE PT	RE			RE	Return on Equity	PIP ROI
20	AO	non-PIP ROE PT	RE			RE	Return on Equity	non-PIP ROI
21	AP	PIP Allogeneic Stem Cell PT				OA	Organ Acquisition Passthrough	Stem Cell Acquisition costs (CR11729)
22	AQ	NON PIP Allogeneic Stem Cell PT				OA	Organ Acquisition Passthrough	Stem Cell Acquisition costs (CR11729)
23	AS	Affiliate Withholdings - Settlement	OB			OB	Offset for Affiliated Providers	
24	AW	Affiliate Withholdings	E3			E3	Withholding	Affiliate Withholding
25	BN	EHR Demo		BN		BN	Bonus	Demonstration Project (CR 6603)
26	C1	Provider Convener Participant - BPCI Advanced				LE/WU	Levy/Unspecified Recovery	CR11110

Codes assigned to report Federally mandated recoupment/bonus payment:

LE ΤL

WU

	<u>HIGLAS</u> <u>PLB X-01 code</u>	Code Meaning - HIGLAS	Previous FISS 835 PLB Code Usage	<u>Previous</u> <u>MCS</u> <u>835 PLB</u> <u>Code</u> <u>Usage</u>	Previous VMS 835 PLB Code Usage	HIPAA PLB Codes for 835 v40101 and v5010 A1- PLB03-1	ASC X12 835 PLB Code Description	<u>Comments</u>
27	C2	Non-Provider Awardee Convener Model 2 BPCI Transaction (does NOT own Episode Initiators)				LE/WU	Levy/Unspecified Recovery	CR8440
28	C3	Non-Provider Awardee Convener Model 3 BPCI Transaction (does NOT own Episode Initiators)				LE/WU	Levy/Unspecified Recovery	CR8440
29	C4	Non-Provider Awardee Convener Model 4 BPCI Transaction (does NOT own Episode Initiators)				LE/WU	Levy/Unspecified Recovery	CR8440
30	CV	Converted Invoices	L3	Internal Use Only		L3	Penalty	PR Conversion
31	D1	Full Hold - Unfiled Cost Report	50			50	Late Charge	Late Filing of Cost Report
32	D2	Full Hold - Unfiled 838	L3			L3	Penalty	PW Unfiled 838
33	D3	Full Hold - Rejected Cost Report	L3			L3	Penalty	PW Rejected Cost Report
34	D4	Full Hold - Failure to comply Auditors	L3			L3	Penalty	PW Failure to comply Auditors
35	D5	Full Hold - DNF	L3	WO		_	,	RA not created
36	D6	Full Hold - Fraud and Abuse	L3	WO		 L3	Penalty	PW Fraud and Abuse
37	D7	Full Hold - Other/Misc	L3	WO		L3	Penalty	PW Other/Misc
38	D8	Full Hold - AP System Hold	L3	WO		L3	Penalty	PWAP Hold
39	D9	Full Hold - Terminated	L3			L3	Penalty	PW Terminated
40	DG	Converted DNF - Pseudo Check		Internal Use Only				No RA
41	DM	Debit Memo	L3	WO		 E3	Withholding	Withholding per Debit Memo
42	DP	Converted Negotiable Checks	-	Internal Use Only		_		No RA
43	DR	DNF Hold Release	L3	Internal Use Only		 L3	Penalty	PR DNF
44	E1	Episode Initiator - BPCI Advanced	10			LE/WU	Levy/Unspecified Recovery	CR11110
45	E2	Episode Initiator Model 2 BPCI Transaction				LE/WU	Levy/Unspecified Recovery	CR8440
46	 E3	Episode Initiator Model 3 BPCI Transaction				LE/WU	Levy/Unspecified Recovery	CR8440
47	E4	Episode Initiator Model 4 BPCI Transaction				LE/WU	Levy/Unspecified Recovery	CR8440
48	FB	Full Hold - Bankruptcy	L3	WO		L3	Penalty	PW Bankruptcy
49	FC	Full Hold - CMS Request	L3	WO		L3	Penalty	PW CMS Request
50	FS	BPCI Funds Switch Invoice	20					No RA
51	FR	Full Hold Release	L3	B2		L3	Penalty	PR
52	G2	Partial Hold - CMS Request	L3	WO		L3	Penalty	PW CMS Request
53	G3	Partial Hold - Bankruptcy	L3	WO		L3	Penalty	PW Bankruptcy
54	G4	Partial Hold - Unfiled Cost Report	L3	-		L3	Penalty	PW Unfiled Cost Report
55	G5	Partial Hold - Unfiled 838	L3			L3	Penalty	Unfiled 838 (Credit Balance Report)
56	H1	Manual Invoices - Cost Settlement Report	C5			C5	Temporary Allowance	Cost Report Settlement
57	HB	HPSA	E3	B2		BN	Bonus	HPSA Bonus
58	IM	Innovation Model				IP/WO	/Overpayment Recovery	CR9744
59	IR	TPP - IRS Levy	IR	WO	IR Vitholding			
60	L1	TPP - IRS Backup	IR	wo		IR	Internal Revenue Service Withholding	
61	L2	TPP - Garnishments	WU	WO		CS	Adjustment	PW Garnishments
62	L3	Third Party Payment - including Attorneys	Internal Use Only	Internal Use Only				No RA

Codes assigned to report Federally mandated recoupment/bonus payment:

LE

ΤL

	HIGLAS PLB X-01 code	Code Meaning - HIGLAS	Previous FISS 835 PLB Code Usage	Previous MCS 835 PLB Code Usage	Previous VMS 835 PLB Code	HIPAA PLB Codes for 835 v40101 and v5010	ASC X12 835 PLB Code Description	<u>Comments</u>
					Usage	A1- PLB03-1		
63	L4	TPP - Child Support	WU	WO		CS	Adjustment	PW Child Support
64	L5	TPP - Alimony	WU	WO		CS	Adjustment	PW Alimony
65	L6	TPP - Secondary Corporation	WU	WO		CS	Adjustment	PW Secondary Corporation
66	L7	TPP - Change of Ownership	WU	WO		CS	Adjustment	Change of Ownership
67	L8	Accelerated/Advance Recoupments Applications	AP	WO		WO	Overpayment Recovery	Advance Recoupment Application
68	LE	Lump Sum Bonus Payment for the Physician Pay for Reporting (P4R) Program and ERx Initiative Payment		LE		LE	Levy	PQRI and ERx (CR6624) Bonus Payment
69	LS	Lump Sum Bonus Payment for the Physician Pay for Reporting (P4R) Program (valid for transactions built before January 4, 2010 only)		LE		LE	Levy	PQRI Bonus Payment
70	M1	Manual Invoices - Refunds	72	B2		72	Authorized return	Refunds - Manual Invoices
71	M4	Manual Invoices - Other C5 B2 C5		Temporary Allowance	Manual Invoices			
72	MA	Manual Invoices - Accelerated/Advance Payment	AP	B2		AP	Acceleration of Benefits	Manual Invoices - Accelerated/Advance Payment
73	MC	Manual Invoices - PIP	PI			PI	Periodic Interim Payment	
74	ML	Manual Invoices - Interim Rate Review	C5			C5	Temporary Allowance	Interim Rate Review
75	N1	Non-Provider Convener Participant - BPCI Advanced				LE/WU	Levy/Unspecified Recovery	CR11110
76	N2	Non-Provider Awardee Convener Model 2 BPCI Transaction (owns SOME or ALL Episode Initiators)				LE/WU	Levy/Unspecified Recovery	CR8440
77	N3	Non-Provider Awardee Convener Model 3 BPCI Transaction (owns SOME or ALL Episode Initiators)				LE/WU	Levy/Unspecified Recovery	CR8440
78	N4	Non-Provider Awardee Convener Model 4 BPCI Transaction (owns SOME or ALL Episode Initiators)				LE/WU	Levy/Unspecified Recovery	CR8440
79	NA	Manual Non Claim Invoices - HI Positive Distribution	Internal Use Only			_		No RA
80	NB	Manual Non Claim Invoices - HI Negative Distribution	Internal Use Only			_		No RA
81	NC	Manual Non Claim Invoices - SMI Positive Distribution	Internal Use Only			_		No RA
82	ND	Manual Non Claim Invoices - SMI Negative Distribution	Internal Use Only			_		No RA
83	NR	Manual Invoices - PT	C5			C5	Temporary Allowance	
84	P1	Single Participant – BPCI Advanced				LE/WU	Levy/Unspecified Recovery	CR11110
85	P2	Provider Awardee Convener Model 2 BPCI Transaction (owns SOME or ALL Episode Initiators				LE/WU	Levy/Unspecified Recovery	CR8440
86	P3	Provider Awardee Convener Model 3 BPCI Transaction (owns SOME or ALL Episode Initiators				LE/WU	Levy/Unspecified Recovery	CR8440
87	P4	Provider Awardee Convener Model 4 BPCI Transaction (owns SOME or ALL Episode Initiators				LE/WU	Levy/Unspecified Recovery	CR8440

				1				
	HIGLAS PLB X-01 code	Code Meaning - HIGLAS	Previous FISS	Previous MCS	Previous VMS	HIPAA PLB Codes for	ASC X12 835 PLB Code Description	<u>Comments</u>
			835 PLB Code	<u>835 PLB</u> <u>Code</u>	<u>835 PLB</u> <u>Code</u>	<u>835 v40101 and v5010</u>		
			<u>Usage</u>	<u>Usage</u>	<u>Usage</u>	<u>A1- PLB03-1</u>		
88	PA	Partial Hold – Admin Freeze				L3		PW Admin Freeze
89	PI	Pennsylvania Rural Health Model Periodic Interim Payment			CR10018			
90	PL	Manual 935 ALJ Interest Refund invoice	PL	PL		L6	Interest Owed	'Code meaning – HIGLAS' and 'Previous MCS 835 PLB Code Usage' changed from previous version
91	PO	Partial Hold - Other/Misc/ PSC Request	L3	WO		L3	Penalty	PW Other/Misc/PSC Request
92	PP	PIP	PI			PI	Periodic Interim Payment	
93	PR	Partial Hold - Release	L3	B2		L3	Penalty	PR Penalty Release
94	RH	Full Hold - Revalidation Hold						No RA
95	RD	Rural Emergency Hospital (REH) Payment	ral Emergency Hospital (REH) Payment CS Adjustment		Adjustment	CR12820		
96	RU	Interest Refund		L6	Interest Owed			
97	S1	Single Awardee Model 1 BPCI Transaction	lel 1 BPCI Transaction Levy/Unspecified Rec		Levy/Unspecified Recovery	CR8440		
98	S2	Single Awardee Model 2 BPCI Transaction				LE/WU	Levy/Unspecified Recovery	CR8440
99	S3	Single Awardee Model 3 BPCI Transaction				LE/WU	Levy/Unspecified Recovery	CR8440
100	S4	Single Awardee Model 4 BPCI Transaction				LE/WU	Levy/Unspecified Recovery	CR8440
101	TD	Manual Invoices - Tentative Settlement	C5			C5	Temporary Allowance	Tentative Settlement
102	TL	TOPS	IS			IS	Interim Settlement	
103	UH	Beneficiary Undeliverable Full Hold						No RA
104	VC	Voids - Reissue Invoices	CS	Internal Use Only		CS	Adjustment	Reissued Invoice
105	VD	Voids - Reissue Debit Memo	CS	WO?		CS	Adjustment	Reissued Debit Memo
106	VO	Void - Reissue Interest Information	CS			CS	Adjustment	Reissued Interest
107	WO	AR/AP Netting Offset	E3	WO		WO	Overpayment Recovery	AR/AP Netting
108	WR	Void - Reissue Split Pay	C5			C5	Temporary Allowance	Reissue Split Pay
109	WS	Settlement Withholding	L3			E3	Withholding	Settlement Withholding
110	WU	FPLP Tax Withholding	wu	wυ		LE/WU Levy		 TREASURY TAX WITHHOLD Treasury telephone xxx-xxx-xxxx Any other Federally mandated payment/recoupment
111	ww	Principal Refund				wo	Overpayment Recovery	The amount in PLB 04 should be negative. And include identifying nos. in PLB03-2
112	ZZ	FPLP Non-tax Withholding	ZZ	ZZ		WU/LE		1) TREASURY NON-TAX WITHHOLD Treasury telephone xxx-xxx-xxxx 2) Any other Federally mandated payment/recoupment

ΤL

	<u>HIGLAS</u> <u>PLB X-01 code</u>	Code Meaning - HIGLAS	Previous FISS	Previous <u>MCS</u>	<u>Previous</u> <u>VMS</u>	<u>HIPAA PLB</u> <u>Codes for</u>	ASC X12 835 PLB <u>Code</u>	<u>Comments</u>
			835 PLBCode Usage	<u>835 PLB</u> <u>Code</u>	<u>835 PLB</u> <u>Code</u>	<u>835 v40101 and v5010</u>	<u>Description</u>	
				<u>Usage</u>	<u>Usage</u>	A1- PLB03-1		
				NON-HIGLAS USE	RS			
113				AP		AP	Acceleration of Benefits	Advance Payment
114					CS	_		Correction and Reversal at the claim/line level
115				FB		FB	Forward Balance	Over Payment
116					CS	FB/WO	Withholding	Follow CR 6870 - for using FB and WO at step I and Step II for 935 Recoupment
117					IR	IR	Internal Revenue Service Withholding	
118				J1		J1	Non-reimbursable	Adjustment per Demonstration Project
119					AP	AP	Acceleration of Benefits	Payment to withheld because it has been determined that the provider/supplier is on Do Not Forward (DNF) or investigated for
120				L6	L6	L6	Interest Owed	Interest paid on claims in this 835
121					WO	WO	Overpayment Recovery	AR/AP Netting
				ADD-ON-PAYMEN	ITS			
122			CS			CS		Outlier
123			CS			CS/HM		Hemo. HM is a new code available in 5010
124			CS			CS		New Technology
125			LS			LS		Indirect Medical Education

	CHANGE LOG
Version	<u>Comments</u>
1.0	Changes for HIGLAS PLB Codes AP & AQ for CR 11729.
2.0	Changes for HIGLAS PLB Codes PA & PO for CR 11930.
3.0	Corrections as follows: Updated Code Meaning for PLB Codes C1, E1, N1, P1 for CR 11110. Removed HIGLAS PLB Code IP for CR 11760. Removed HIGLAS PLB Codes H2, M2 and M3. Added HIGLAS PLB Code IM for CR 9744. Added HIGLAS PLB Code II for CR 10018. Added HIGLAS PLB Code UH for CR 10439. Added new HIGLAS PLB Code (RD' for CR 12820

Medicare Claims Processing Manual Chapter 4 - Part B Hospital (Including Inpatient Hospital Part B and OPPS)

Table of Contents

(Rev. 11900; 03-13-23)

Transmittals for Chapter 4

10.6.1 - Payment Adjustment for Rural Sole Community Hospitals

10.6.4 - Payment Adjustment for Rural Emergency Hospitals

10.6.1 - Payment Adjustment for Rural *Sole Community* Hospitals (*Rev. 11900; Issued: 03-13-23; Effective:01-01-23; Implementation:01-03-23*)

Beginning January 1, 2006, rural sole community hospitals (SCHs), including essential access community hospitals (EACHs), receive a 7.1 percent increase in payments for most services, with certain exceptions. Services which are excepted from the increase in payments include, but are not limited to, separately paid drugs and biologicals and items paid at charges adjusted to cost. This adjustment is authorized under Section 1833(t)(13)(B) of the Act, and implemented in accordance with Section 419.43(g) of the regulations. The adjustment is automatically applied in Pricer.

10.6.4 - Payment Adjustment for Rural Emergency Hospitals¹ (Rev. 11900; Issued: 03-13-23; Effective:01-01-23; Implementation:01-03-23)

A rural emergency hospital (REH), as defined in § 419.91, is an entity that operates for the purpose of providing emergency department services, observation care, and other outpatient medical and health services specified by the Secretary in which the annual per patient average length of stay does not exceed 24 hours. The time calculation for determining the length of stay of a patient receiving REH services begins with the registration, check-in or triage of the patient (whichever occurs first) and ends with the discharge of the patient from the REH. The discharge occurs when the physician or other appropriate clinician has signed the discharge order, or at the time the outpatient service is completed and documented in the medical record. The entity must not provide inpatient services, except those furnished in a unit that is a distinct part licensed as a skilled nursing facility to furnish post-hospital extended care services.

Rural emergency hospital services, as defined in § 419.91, are all covered outpatient department (OPD) services, as defined in section 1833(t)(1)(B) of the Act, excluding services described in section 1833(t)(1)(B)(ii), furnished by an REH that would be paid under the OPPS when provided in a hospital paid under the OPPS for outpatient services, provided that such services are furnished consistent with the conditions of participation at 42 C.F.R. §§ 485.510 - 485.544.

A. Payment for REH Services

Beginning January 1, 2023, a REH that provides a REH service will receive a Medicare payment for the service that is equal to the amount of payment that would otherwise apply under section 1833(t) of the Act for the equivalent covered OPD service, increased by 5 percent to reflect the higher costs incurred by such hospitals. The beneficiary co-payment for the service is calculated the same way as it is calculated under section 1833(t)(8) of the Act for the equivalent covered OPD service, excluding the 5 percent payment increase.

EXAMPLE:

1. Service/Rate x 0.05 = Increase Amount for REH Services

¹ The information described in Section 10.6.4 of this Manual is based on proposed policies to implement payment for REHs, published as a rider to the CY2023 OPPS proposed rule. All policies are subject to change pending the publication of the final policies concerning this new provider type, including associated REH payment policies, in the CY2023 OPPS Final Rule, CMS-1772-FC. If there are changes to these proposed policies made in response to public comments in the final rule, CMS will update this section accordingly.

\$100.00/Rate x 0.05 = \$5.00 Increase Amount for REH Services

2. Service/Rate + Increase Amount for REH Services = Allowed Amount \$100.00 + \$5.00 = \$105.00 Allowed Amount

3. Service/Rate x 0.20 = Coinsurance \$100.00 * 0.20 = \$20.00 Coinsurance

Claims for REH services are paid based on OPPS prospective rates and are adjudicated based on OPPS payment policies and rules. Services performed by an REH that do not meet the definition of an REH service (i.e. certain outpatient services that may be provided on an outpatient basis by OPPS hospitals but are not paid under the OPPS) are paid at the same rate as the service would be paid if performed at an OPPS hospital and paid based on the applicable fee schedule outside of the OPPS. Such services are not considered REH services and do not receive the additional 5 percent payment that REH services receive. Ambulance services furnished by an entity owned and operated by a rural emergency hospital are paid under the ambulance fee schedule as described at section 1834(1) of the Act. Post-hospital extended care services furnished by a rural emergency hospital that has a unit that is a distinct part licensed as a skilled nursing facility are paid under the skilled nursing facility prospective payment system described at section 1888(e) of the Act.

B. Monthly REH Facility Payment

In addition to payment for individual claims, section 1834(x)(2) of the Act requires REHs to be paid a monthly facility payment. The monthly facility payment for every REH is the same. There is no adjustment to the facility payment because of the size of the REH or amount of revenue generated by the REH. For 2024 and subsequent years, this payment will be updated annually by the hospital market basket percentage increase.

50.1 - Outpatient Provider Specific File

(Rev. 11900; Issued: 03-13-23; Effective:01-01-23; Implementation:01-03-23)

The Outpatient Provider Specific File (OPSF) contains the required information about each provider to enable the pricing software to calculate the payment amount. Data elements and formats are shown below. Contractors must maintain the accuracy of the data, and update the file as changes occur in data element values, e.g., changes in metropolitan statistical area (MSA), bed size, cost to charge ratio. An update is accomplished by preparing and adding an additional complete record showing new current values and the effective date of the change. The old record is retained without change.

Contractors must also furnish CMS a quarterly file in the same format.

NOTE: All data elements, whether required or optional, must have a default value of "0" (zero) if numerical, or blank if alphanumerical.

File Position	Format	Title	Description
1-10	X(10)	National Provider Identifier (NPI)	Alpha-numeric 10 character provider number.
11-16	X(6)	Provider Oscar Number	Alpha-numeric 6 character provider number.
17-24	9(8)	Effective Date	Must be numeric, CCYYMMDD. This is the effective date of the provider's first OPPS period. For subsequent OPPS periods, the effective date is the date of a change to the PROV file. If a termination date is present for this record, the effective date must be equal to or less than the termination date.
25-32	9(8)	Fiscal Year Beginning Date	Must be numeric, CCYYMMDD. Month: 01-12 Day: 01-31 The date must be greater than 19990630.
33-40	9(8)	Report Date	Must be numeric, CCYYMMDD. Month: 01-12 Day: 01-31 The created/run date of the PROV report for submittal to CO.
41-48	9(8)	Termination Date	Must be numeric, CCYYMMDD. Must be zeroes or contain a termination date. (Once the official "tie-out" notice from CMS is received). Must be equal to or greater than the effective date. (Termination date is the date on which the reporting contractor ceased servicing the provider in question).

49	X(1)	Waiver Indicator	Enter a "Y" or "N."
			Y = waived (provider is not under OPPS)
			For End Stage Renal Disease (ESRD) facilities provider waived blended payment, pay full PPS.
			N = not waived (provider is under OPPS)
			For ESRD facilities provider did not waive blended payment. Pay according to transitional payment method for ESRD PPS through 2013.
50-54	9(5)	Intermediary Number	Enter the Contractor #.

55-56	X(2)	Provider Type	This identifies providers that require special
			handling. Enter one of the following codes as appropriate.
			00 or blanks = Short Term Facility
			02 Long Term 03 Psychiatric
			04 Rehabilitation Facility
			05 Pediatric
			06 <i>Reserved</i> 07 Rural Referral Center
			08 Indian Health Service
			13 Cancer Facility
			14 Medicare Dependent Hospital (during cost reporting periods that began on or after April 1, 1990.
			15 Medicare Dependent Hospital/Referral Center
			(during cost reporting periods that began on or after April 1, 1990. Invalid October 1, 1994
			through September 30, 1997).
			16 Re-based Sole Community Hospital17 Re-based Sole Community Hospital /Referral Center
			18 Medical Assistance Facility
			21 Essential Access Community Hospital
			22 Essential Access Community Hospital/Referral Center
			23 Rural Primary Care Hospital
			24 Rural Emergency Hospitals
			32 Nursing Home Case Mix Quality Demonstration Project – Phase II
			33 Nursing Home Case Mix Quality
			Demonstration Project – Phase III – Step 1 34 <i>Free-standing Opioid Treatment Program</i>
			35 Hospice
			36 Home Health Agency 37 Critical Access Hospital

			 38 Skilled Nursing Facility (SNF) – For non- demo PPS SNFs – effective for cost reporting periods beginning on or after July 1, 1998 40 Hospital Based ESRD Facility 41 Independent ESRD Facility 42 Federally Qualified Health Centers 43 Religious Non-Medical Health Care Institutions 44 Rural Health Clinics-Free Standing 45 Rural Health Clinics-Provider Based 46 Comprehensive Outpatient Rehab Facilities 47 Community Mental Health Centers 48 Outpatient Physical Therapy Services 49 Psychiatric Distinct Part 50 Rehabilitation Distinct Part 51 Short-Term Hospital – Swing Bed 52 Long-Term Care Hospital – Swing Bed 54 Critical Access Hospital – Swing Bed
57	X(1)	Special Locality Indicator	Indicates the type of special locality provision that applies. For End Stage Renal Disease (ESRD) facilities value "Y" equals low volume adjustment applicable.
58	X(1)	Change Code For Wage Index Reclassification	Enter "Y" if the hospital's wage index location has been reclassified for the year. Enter "N" if it has not been reclassified for the year. Adjust annually. Does not apply to ESRD Facilities.
59-62	X(4)	Actual Geographic Location—MSA	Enter the appropriate code for MSA, 0040–9965, or the rural area, (blank) (blank) 2-digit numeric State code, such as _ <u>36</u> for Ohio, where the facility is physically located.

63-66	X(4)	Wage Index Location—MSA	The appropriate code for the MSA, 0040-9965, or the rural area, (blank)(blank) (2 digit numeric State code) such as <u>36</u> for Ohio, to which a hospital has been reclassified for wage index. Leave blank or enter the actual location MSA if not reclassified. Does not apply to ESRD Facilities.
67-70	9V9(3)	Payment-to-Cost Ratio	Enter the provider's payment-to-cost ratio. Does not apply to ESRD Facilities.
71-72	9(2)	State Code	Enter the 2-digit state where the provider is located. Enter only the first (lowest) code for a given state. For example, effective October 1, 2005, Florida has the following State Codes: 10, 68 and 69. Contractors shall enter a "10" for Florida's State Code.
			List of valid State Codes is located in Pub. 10007, Chapter 2, Section 2779A1.
73	X(1)	TOPs Indicator	Enter the code to indicate whether TOPs applies or not. Y = qualifies for TOPs N = does not qualify for TOPs

74	X(1)	Quality Indicator	Hospital:
	Field	Enter the code to indicate whether the hospital meets data submission criteria per HOP QDRP requirements.	
			1 = Hospital quality reporting standards have been met or hospital is not required to submit quality data (e.g., hospitals that are specifically excluded from the IPPS or which are not paid under the OPPS, including psychiatric, rehabilitation, long-term care and children's and cancer hospitals, Maryland hospitals, Indian Health Service hospitals, or hospital units; or hospitals that are located in Puerto Rico or the U.S. territories). The reduction does not apply to hospices, CORFs, HHAs, CMHCs, critical access hospitals or to any other provider type that is not a hospital.
			Blank = Hospital does not meet criteria.
			Independent and Hospital-based End Stage Renal Disease (ESRD)Facilities:
			Enter the code applicable to the ESRD Quality Incentive Program (QIP):
			Blank = no reduction
			$1 = \frac{1}{2}$ percent payment reduction 2 = 1 percent payment reduction $3 = 1 \frac{1}{2}$ percent payment reduction 4 = 2 percent payment reduction
			* Please refer to file position 101 for ESRD Children's Hospitals Quality Indicator.
75	X(1)	Filler	Blank.

76-79	9V9(3)	Outpatient Cost- to-Charge Ratio	Derived from the latest available cost report data. See §10.11 of this chapter for instructions on how to calculate and report the Cost-to-Charge Ratio.
			Does not apply to ESRD Facilities.
80-84	X(5)	Actual	00001-89999, or the rural area, (blank) (blank)
		Geographic Location CBSA	(blank) 2 digit numeric State code such as $___3$ <u>6</u> for Ohio, where the facility is physically located.
85-89	X(5)	Wage Index Location CBSA	Enter the appropriate code for the CBSA, 0000189999, or the rural area, (blank)(blank)(blank) (2 digit numeric State code) such as3 6 for Ohio, to which a hospital has been reclassified due to its prevailing wage rates. Leave blank or enter the Actual Geographic Location CBSA, if not reclassified. Pricer will automatically default to the actual location CBSA if this field is left blank. Does not apply to ESRD Facilities.
90-95	9(2) V9(4)	Special Wage Index	Enter the special wage index that certain providers may be assigned. Enter zeroes unless the Special Payment Indicator equals a "1" or "2."
96	X(1)	Special Payment Indicator	The following codes indicate the type of special payment provision that applies.
			Blank = not applicable
			Y = reclassified
			1 = special wage index indicator
			2 = both special wage index indicator and reclassified
			D = Dual Reclassified

97-100	9(4)	Reduced Coinsurance Trailer Count	Enter the number of APCs the provider has elected to reduce coinsurance for. The number cannot be greater than 999.
101	X(1)	Quality Indicator ESRD Children's Hospitals	Children's Hospitals for End Stage Renal Disease (ESRD) Facilities: Enter the code applicable to the ESRD Quality Incentive Program (QIP): Blank = no reduction $1 = \frac{1}{2}$ percent payment reduction 2 = 1 percent payment reduction $3 = 1 \frac{1}{2}$ percent payment reduction 4 = 2 percent payment reduction
102-105	9V9(3)	Device department's Cost- to-Charge Ratio	Derived from the latest available cost report data. Does not apply to ESRD Facilities.
106-112	X(7)	Carrier/Locality code	The carrier/locality code for the provider service facility. The first five positions represent the carrier code and the last two positions represent the locality code.
113-117	9(5)	County Code	Enter the County Code. Must be 5 numbers.
118-122	X(5)	Payment CBSA	Enter the appropriate code for the CBSA, 0000189999, or the rural area, (blank)(blank)(2 digit numeric State code) such as3 6 for Ohio, to which a hospital has been reclassified due to its prevailing wage rates. Leave blank or enter the Actual Geographic Location CBSA, if not reclassified. Pricer will automatically default to the actual location CBSA if this field is left blank. Does not apply to ESRD Facilities.

123-128	9V9(5)	Payment Model Adjustment (PMA)	Derived from payment model Technical Direction Letter.
129-133	9\79999	Medicare Performance Adjustment (MPA)	Enter the MPA percentage calculated and published by the Centers for Medicare & Medicaid Services (CMS).
134-139	9(2) V9(4)	Supplemental Wage Index	Enter the supplemental wage index that certain providers may be assigned. Enter zeroes if it does not apply.
140-140	X(1)	Supplemental Wage Index Flag	Enter the supplemental wage index flag: 1=Prior Year Wage Index 2=Future use 3=Future use Enter blank if it does not apply.
141-162	X(22)	FILLER	

The contractor enters the number of APCs for which the provider has elected to reduce coinsurance. Cannot be greater than 999. Reduced Coinsurance Trailer Record - Occurs 0-999 times depending on the reduced Coinsurance Trailer Count in positions 97-100. Due to system's capacity limitations the maximum number of reduced coinsurance trailers allowable is 999 at this time.