

## ATTACHMENT 2

### FY 2012 Hospital Wage Index Development Timetable (October 2010 through October 2011)

<u>Date:</u>	<u>Task:</u>
October 4, 2010	Release of two preliminary FY 2012 wage index files: 1) unaudited FY 2008 Worksheet S-3 wage data file, and 2) 2007-2008 occupational mix survey data. The FY 2008 wage data file includes Worksheet S-3 wage data from cost reports submitted to HCRIS through June 30, 2010. The 2007-2008 occupational mix file includes survey data that were included in the final FY 2011 wage index. The files exclude hospitals designated as CAHs as of September 17, 2010.  Notice sent from CMS to FIs/MACs regarding the December 6, 2010, deadline for hospitals to request revisions to the wage index data as reflected in the preliminary files. Notice must be forwarded by the FIs/MACs to hospitals they service to alert hospitals to the availability of the preliminary wage data file for their review and to inform hospitals that this will be their final opportunity to request revisions.
December 6, 2010	Deadline for hospitals to request revisions to their Worksheet S-3 wage data and occupational mix data as included in the October PUFs and to provide documentation to support the request. <b>FIs/MACs must receive the revision requests and supporting documentation by this date.</b> FIs/MACs will have approximately 10 weeks to complete their reviews, make determinations, and transmit revised data to CMS's Division of Acute Care (DAC).
February 9, 2011	Deadline for FIs/MACs to complete all desk reviews for hospital wage data and transmit revised Worksheet S-3 wage data and occupational mix data to DAC. Worksheet S-3 wage data must be sent to DAC in electronic format (HCRIS hdt format or the Excel manual template provided by CMS). Occupational mix data must be sent to DAC on the electronic Excel spreadsheet provided by DAC.
February 14, 2011	Deadline for FIs/MACs to notify State hospital associations regarding hospitals that fail to respond to issues raised during the desk reviews. The purpose of the letter is to inform the State association and its member hospitals that a hospital's failure to respond to matters raised by the FI/MAC can result in lowering an

area's wage index value and, therefore, lower Medicare payments for all hospitals in the area.

**February 22, 2011**

Release of revised FY 2012 wage index and occupational mix files as PUFs on the CMS Web site. These data will have been desk reviewed and verified by the FIs/MACs before being published. Also, a file including each urban and rural area's average hourly wages for the FYs 2011 (final) and 2012 (preliminary) wage indexes will be provided on the CMS Web site.

March 7, 2011

Deadline for hospitals to submit requests (including supporting documentation) for: 1) corrections to errors in the February PUFs due to CMS or FI/MAC mishandling of the wage index data, or 2) revisions of desk review adjustments to their wage index data as included in the February PUFs (and to provide documentation to support the request). **FIs/MACs must receive the requests and supporting documentation by this date.** No new requests for wage index and occupational mix data revisions will be accepted by the FIs/MACs at this point, as it is too late in the process to handle data that is new to the FIs/MACs in a timely manner.

April/May, 2011

Approximate date proposed rule will be published; includes proposed wage index, which is calculated based on the revised wage index data from February; 60-day public comment period and 45-day withdrawal deadline for hospitals applying for geographic reclassification.

April 13, 2011

Deadline for FIs/MACs to transmit final revised wage index data (in HCRIS hdt format or by the Excel manual template) to DAC for inclusion in the final wage index. Worksheet S-3 wage data must be transmitted in HCRIS hdt format or by the Excel manual template. Occupational mix data must be sent to DAC on the electronic Excel spreadsheet provided by DAC. All wage index data revisions must be transmitted to DAC by this date. FIs/MACs must also send written notification to hospitals regarding the hospitals' March 7, 2011, correction/revision requests by this date.

April 20, 2011

Deadline for hospitals to appeal FI/MAC determinations and request CMS' intervention in cases where the hospital disagrees with the FI's/MAC's determination. It should be noted that during this review, CMS does not consider issues such as the adequacy of a hospital's supporting documentation, as CMS believes that the FIs/MACs are generally in the best position to make evaluations regarding the appropriateness of these types of issues (which should have been resolved earlier in the process). **Requests must be submitted to CMS (and a copy sent to the FI/MAC) by this**

**date.** The request must include all correspondence between the hospital and FI/MAC that document the hospital's attempt to resolve the dispute earlier in the process.

Late April, 2011

Final FY 2012 wage index data compiled and sent by CMS to FIs/MACs for verification. This verification of the final wage and occupational mix data by the FIs/MACs is necessary to ensure that the correct data for each hospital has been properly transmitted and received. The FIs/MACs will have approximately 1 week in which to complete the verification.

Notice sent from CMS to each FI/MAC regarding the May 6, 2011, release of the final FY 2012 wage index data PUFs and the June 6, 2011, deadline for hospitals to request corrections to the wage and occupational mix data as reflected in the final files. Notice must be forwarded by FIs/MACs to hospitals they service to alert hospitals to the availability of the final wage index and occupational mix data files for their review, and to inform hospitals that this will be their last opportunity to request corrections to errors in the final data. Changes to data will be limited to situations involving errors by CMS or the FI/MAC that the hospital could not have known about before review of the final May PUFs. Data that was incorrect in the October or February wage index data PUFs, but for which no correction request was received by the March 7, 2011 deadline, will not be considered for correction at this stage.

May 6, 2011

Release of final FY 2012 wage index and occupational mix data PUFs on CMS Web page. Hospitals will have approximately 1 month to verify their data and submit correction requests to **both** CMS and their FI/MAC to correct errors due to CMS or FI/MAC mishandling of the final wage and occupational mix data.

June 6, 2011

Deadline for hospitals to submit correction requests to **both** CMS and their FI/MAC to correct errors due to CMS or FI/MAC mishandling of the final wage and occupational mix data. **CMS and the FIs/MACs must receive all requests by this date.** CMS emphasizes that data that were incorrect in the October or February wage index data PUFs, but for which no correction request was received by the March 7, 2011, deadline, will not be changed at this stage for inclusion in the wage index. Each correction request must include all information and supporting documentation needed for CMS and the FI/MAC to determine whether or not the hospital's request meets the criteria for a correction to their data at this point in the wage index development. The FIs/MACs and DAC will review each request upon receipt and consult to

determine whether or not the request qualifies for correction of the final wage and occupational mix data.

August 1, 2011

Approximate date for publication of the FY 2012 final rule; wage index includes final wage index data corrections.

October 1, 2011

Effective date of FY 2012 wage index.