



## 2552-10 Transmittal #4

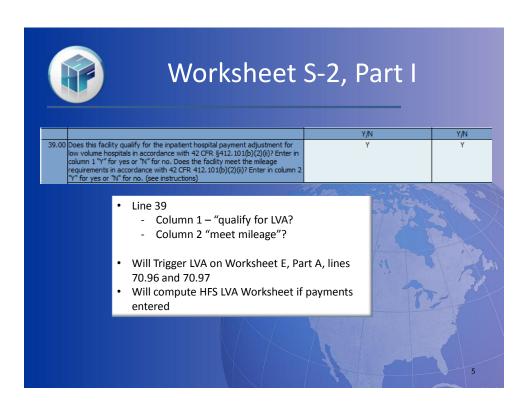
- Advance copy distributed 9/20/2013
- Test Case distributed to vendors 9/23/2013
- Initial HFS comments on test case submitted 9/24/2013
- Follow up comments submitted 9/27/2013
- Published on CMS website 9/27/2013
  - www.cms.gov/Regulations-and-Guidance/Guidance/Transmittals/2013-Transmittals.html
- HFS Test Case submitted 10/2/2013
- Currently waiting on CMS revised test case for HFS comments.



# 2552-10 Transmittal #4

- Effective Date "Cost Reporting Periods Beginning on or After October 1, 2012."
- Some provisions effective earlier
  - Sequestration effective for services 4/1/2013
  - Bad Debt reductions effective FYB 10/1/2012
  - ESRD PPS effective FYE on or after 1/1/2011
  - ACA Section 5503 I&R changes effective FYE on or after 7/1/2011
- Other retroactive changes

			rksheet	t S-2	2, Pa	art I			
	Inpatient PPS Informat	ion 							
	disproportionate share hosp §412.106? In column 1, en	dis it currently receiving payments for vital adjustment, in accordance with 42 CFR ter "\" for yes or "\" for no. Is this facility i412.06(c)(2)(Pidel amendment hospital?) In or "\" for no.	Y	N					
23.00	Which method is used to de below? In column 1, enter 1 date of discharge. Is the m	termine Medicaid days on lines 24 and/or 25 if date of admission, 2 if census days, or 3 if ethod of identifying the days in this cost om the method used in the prior cost reporting	3	N					
			In-State Medicaid paid days	In-State Medicaid eligible unpaid days	Out-of State Medicaid paid days	Out-of State Medicaid eligible unpaid days	Medicaid HMO days	Other Medicai days	
25.00	col. 1, in-state Medicaid elig paid days in col. 3, out-of-s Medicaid HMO paid and eligi Medicaid days in column 6. If this provider is an IRF, in-state Medicaid eligible un col. 3, out-of-state Medicai	ospital, enter the in-state Medicaid paid days in lible unpaid days in Colie unpaid days in Colie unpaid days in Colie unpaid days in col. 4, beit but unpaid days in column 5, and other the in-state Medicaid paid days in col. 1, the paid days in col. 1, the paid days in col. 2, out-of-state Medicaid days in col. 2 days in col. 2, out-of-state Medicaid days in col. 5, and other Medicaid days in col.	14,645	886	0	101	0		
	para ana cirquic bat arpara	days ar co., sy and other recursion days ar co., o.		/ (4)	1	11	2 1	ST L	
		W/S S-2 part I, line 24 (Medicaid days), will now be							
		edited to tie to S-3 part I, column 7 – If line 23 is "3".							
		W/S S-2 part I, line 24, column 6 now to report LDR days							
		W/S S-2 part I, line 25 (IRF Medicaid days), will now be							
		edited to tie to S-	3 part I, column 7	- If line	23 is "3".				
		W/S S-2 part I, line 25, column 6 (IRF "Other" Medicaid							
		days), is NO LONG	SER TO BE USED.					4	
			URNET	1000	A THE RESIDENCE				





#### FY 2013 IPPS Update

Section 5503 Redistribution Clarification

- Previous Hospitals that received 5503 increase shall ensure during the 5-year period beginning on the date of increase:
  - Number of FTEs for primary care is not less than average FTE for primary care during 3 most recent cost reporting periods
  - Not less than 75% of the positions attributable to increase are in primary care or general surgery



#### FY 2013 IPPS Update

Section 5503 Redistribution Clarification

- Revised Hospitals that received 5503 must use all of the awarded slots in it's final cost reporting period of the 5-year period beginning 7/1/2011 and ending 6/30/2016 or the cap will be reduced for unused slots for cost reporting periods beginning on or after 7/1/2016. Used slots are determined as:
  - Lessor of the number of slots used for an expansion in the fourth 12-month cost report or the final cost report.
  - For a new program, the number of slots used in the final cost report.
  - The portion of slots used are subject to the 75% test and 3year primary care average requirement.

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# Worksheet S-2, Part I

• Worksheet S-2, Part I, instructions:

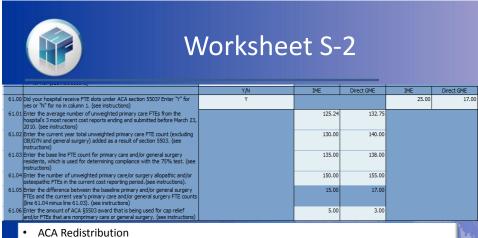
Requirements During Five Year Period Following Implementation of Increases to Hospitals' FTE Resident Caps Under Section 5503 of the ACA, Lines 61 and Subscripts--Section 5503 of the ACA states that a hospital that receives an increase to its FTE resident cap under section 5503 shall ensure, during the 5-year period beginning on July 1, 2011, that:

(I) The number of FTE primary care residents is not less than the average number of FTE

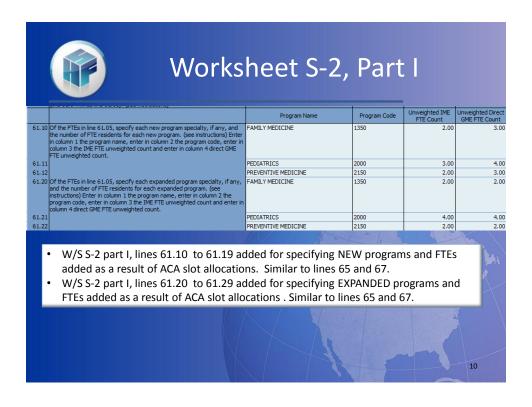
(I) The number of FTE primary care residents is not less than the average number of FTE primary care residents during the three most recent cost reporting periods ending prior to the date of enactment of section 5503; and
(II) Not less than 75 percent of the positions attributable to such increase are in a

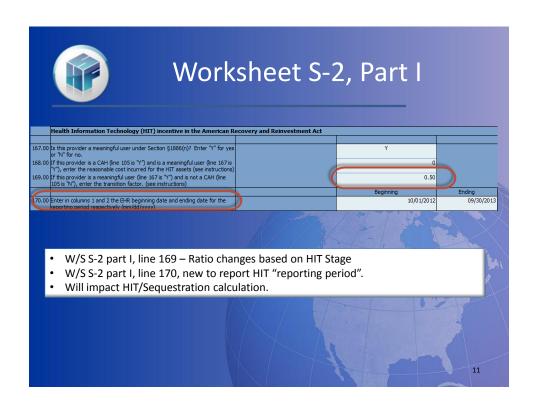
primary care or general surgery residency.

Failure to comply with either of these two requirements, known as the 3-year primary care average requirement (I) and the 75 percent test (II) means permanent removal of all section 5503 slots from the earliest applicable cost reporting period under the regulations at 42 CFR 413.79(n)(2).



- - Line 61 columns 2 and 3 were 3 year "average" primary care residents now reported on line 61.01
  - T-4 Line 61 columns 4 and 5 for awarded slots
  - Line 61.02 primary care FTE's actually added as a result of ACA
  - 61.03 Base line FTE count for Primary care/general surgery for 75% test
  - 61.04 Primary care FTEs in current year for comparison.
  - 61.05 line 61.04 61.03
  - 61.06 FTEs awarded and used for cap relief









## Worksheet S-2 part IX

- S-2 part IX is an unofficial HFS worksheet, to enable users to have Titles V or XIX calculate differently than Title XVIII (Medicare).
- The 7 questions default to follow Medicare, so if there is no reason to change calculations for Titles V or XIX, do nothing with S-2 part IX.
- If you change something and realize it should not have been changed, you can delete the worksheet and get back to the defaults. Forms, Delete, S-2 part IX.

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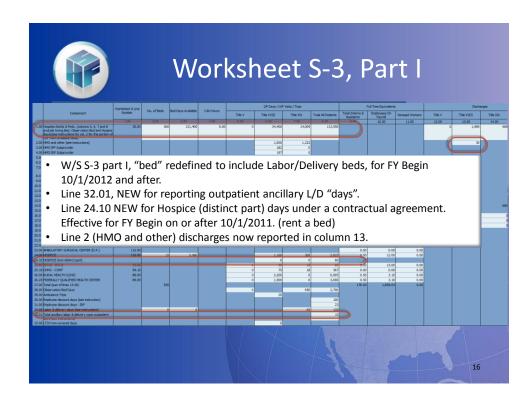
# Worksheet S-2 part IX

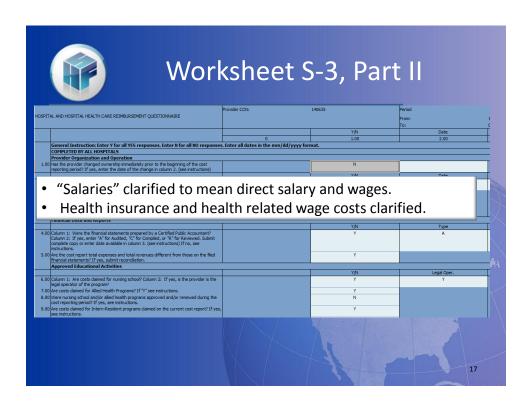
- Line 1 is to have I&R NOT carve out the Post Stepdown Adjustment (B part I, column 25), so the "cost" flowing to the Title V or XIX W/S C is different than Title XVIII.
- The instructions for W/S S-2 part IX are under HELP, but you must open S-2 part I, then click on HELP, CMS Instructions, then scroll down to S-2 part IX.
- If there are other scenarios we need to add to S-2 part IX, please email support@hfssoft.com.



# **Counting Inpatient Days**

- Effective for cost reporting periods beginning on or after 10/1/2011
  - Use of acute care beds under a contractual agreement for unrelated Hospice provider included in total days for DSH
  - Not patient of hospital excluded from Medicaid/SSI days
  - Associated revenues will be offset on A-8
- Effective for cost reporting periods beginning on or after 10/1/2012
  - Labor and delivery room beds included as available beds for IME/DSH
  - No change for DGME or Medicare utilization
  - Outpatient use of beds to be excluded similar to observation beds

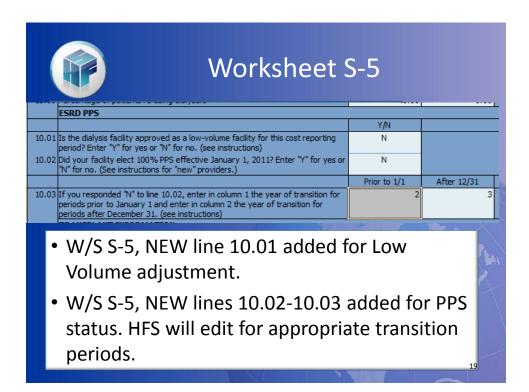


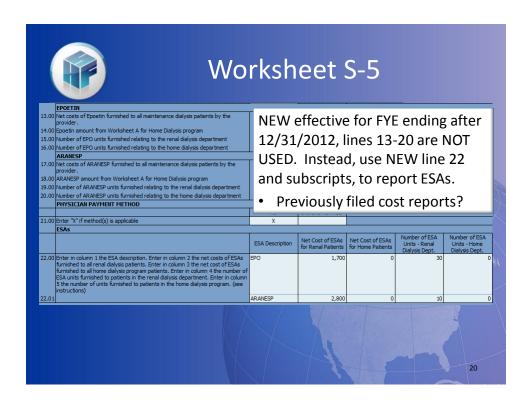


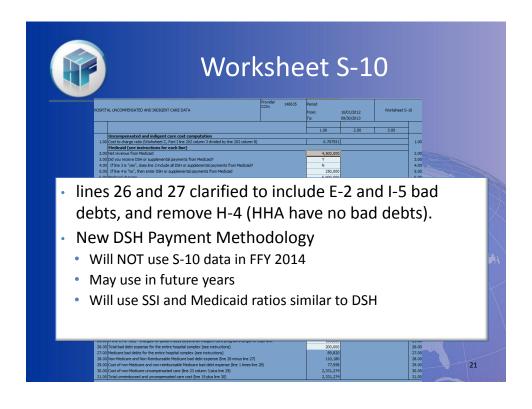


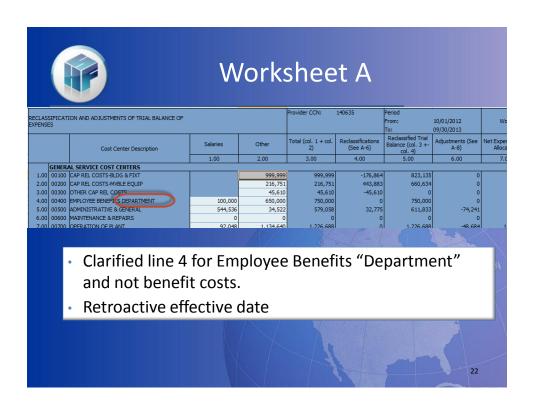
## Worksheet S-5 – ESRD PPS

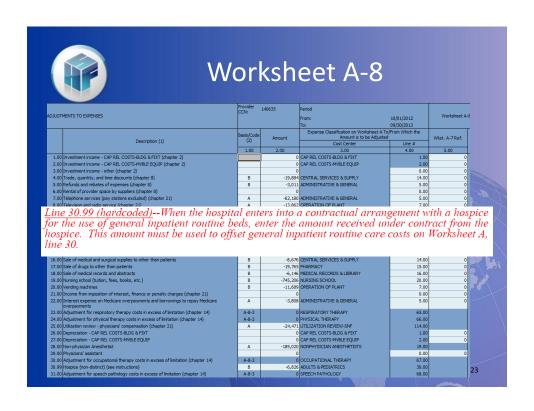
- Revised ESRD bundled payment system implemented for services effective 1/1/2011.
- Extensions NOT provided for hospital-based ESRD units prior to T-4.
  - Hospital based ESRDs instructed to submit cost reports using the new 2552-10, with the existing T-2/3 I series worksheets.
  - Will providers be required to re-file or MACs be required to reopen for cost reports previously filed on earlier transmittal?

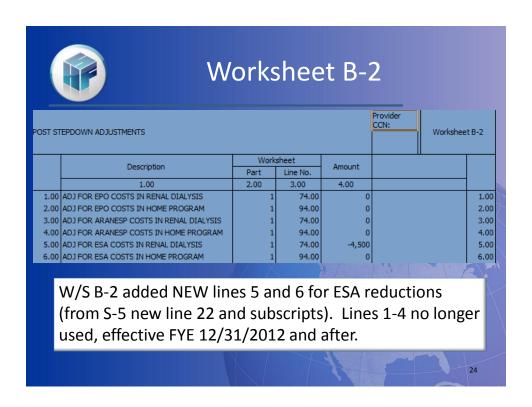


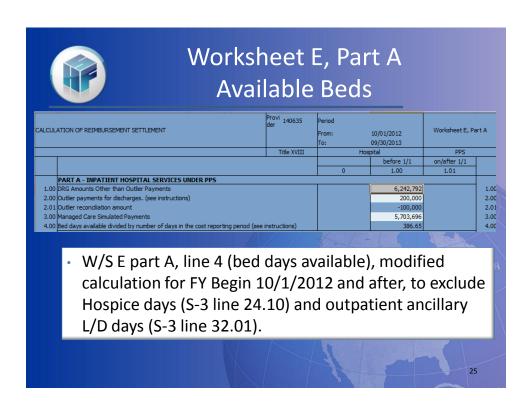


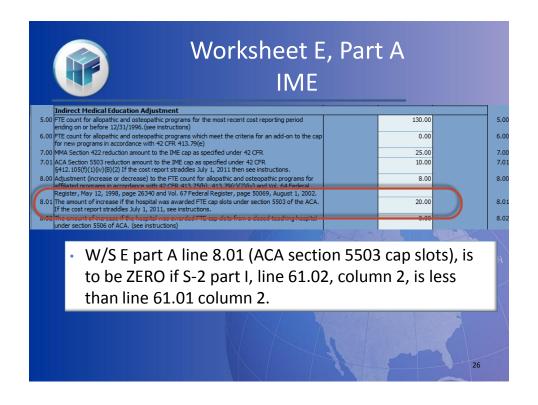


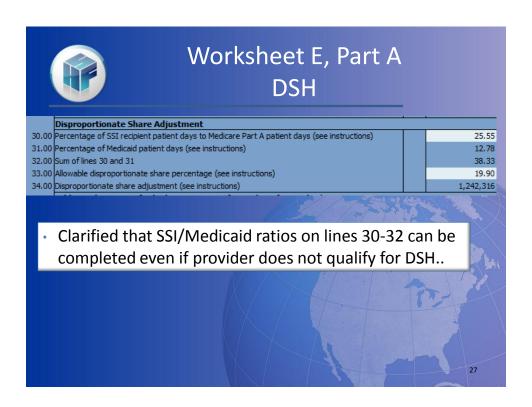


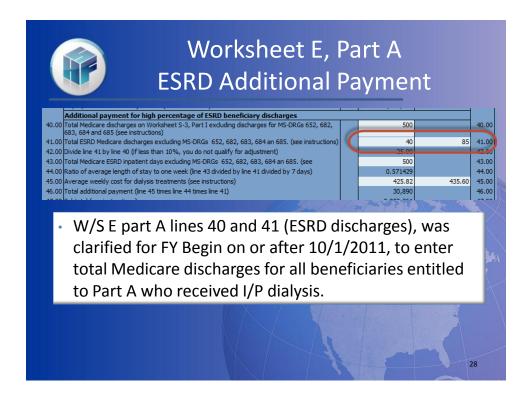


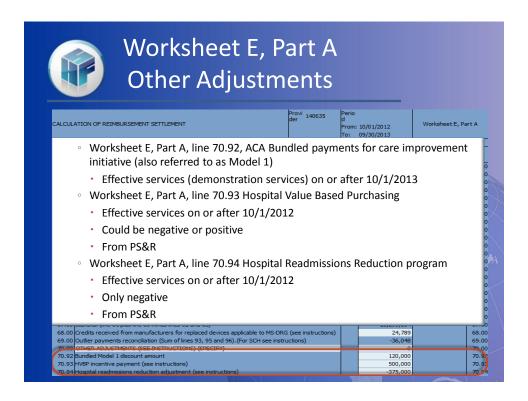


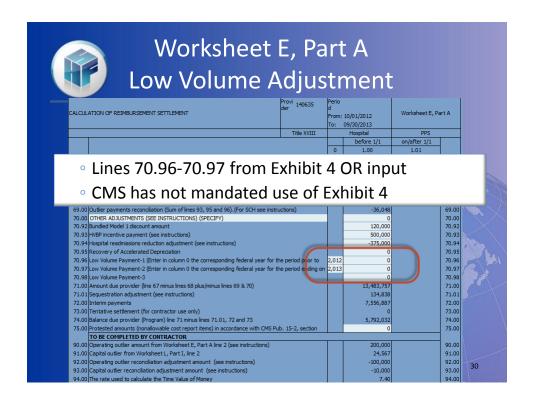














#### **Bad Debt Reductions**

- Middle Class Tax Relief and Job Creation Act of 2012
  - Reduction to bad debt amounts
  - Also impacts "bad debt moratorium" Eliminated for cost reporting periods beginning on or after October 1, 2012
- Final Rule Provision for:
  - Hospital bad debts
  - Skilled Nursing Facility bad debts
  - All other provider types
  - Did NOT address bad debt moratorium

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### **Bad Debt Reductions**

- Hospital
  - From 70% allowable to 65% allowable for hospital cost reporting periods beginning during Federal fiscal year 2013 and subsequent fiscal years.
- Skilled Nursing Facility
  - Non-dual eligible From 70% allowable to 65% allowable for cost reporting periods beginning during Federal fiscal year 2013 and subsequent fiscal years.
- Swing-bed Services
  - Non-dual eligible From 100% allowable to 65% allowable for cost reporting periods beginning during Federal fiscal year 2013 and subsequent fiscal years.



### **Bad Debt Reductions**

- SNF and Swing-bed dual Eligible
  - Cost reporting periods beginning during FFY 2013 12%
  - Cost reporting periods beginning during FFY 2014 24%
  - Cost reporting periods beginning during FFY 2015 and Subsequent – 35%
- All other Provider Types (CAHs, ESRD, CMHC, FQHC, RHC)
  - Cost reporting periods beginning during FFY 2013 12%
  - Cost reporting periods beginning during FFY 2014 24%
  - Cost reporting periods beginning during FFY 2015 and Subsequent – 35%

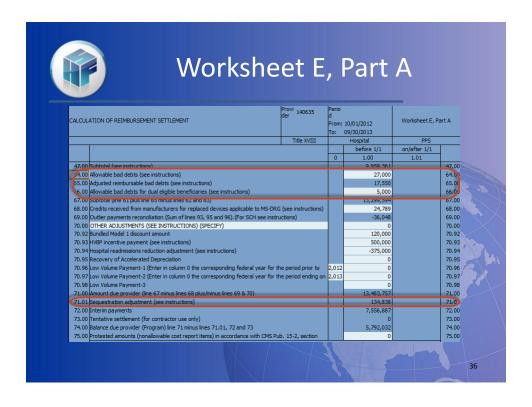
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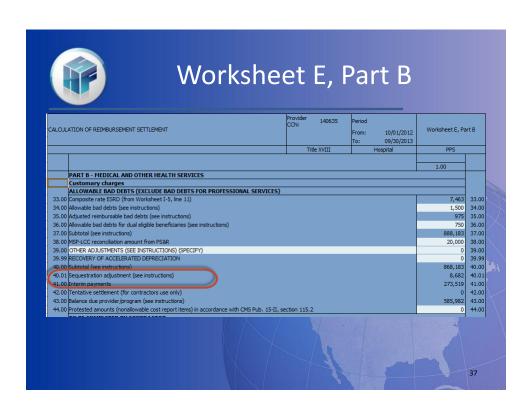


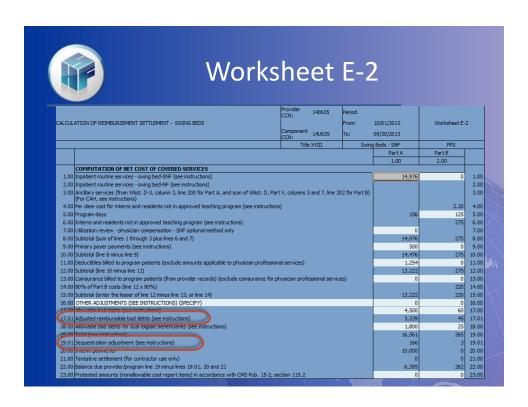
## Sequestration

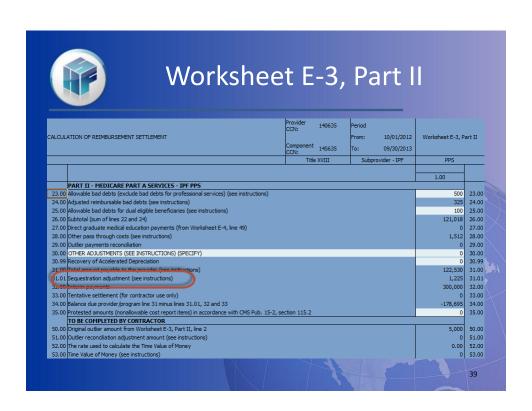
- Technically, the sequestration is effective for a one-year period beginning April 1, 2013 through March 31, 2014.
- Ending date subject to budget reconciliation.
- CMS will not be placing a through date in the cost reporting instructions but will refer to the period as "the cost reporting period that occurs during the sequestration period beginning on or after April 1, 2013".

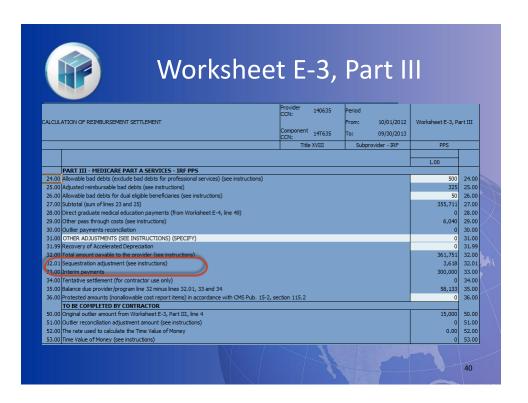


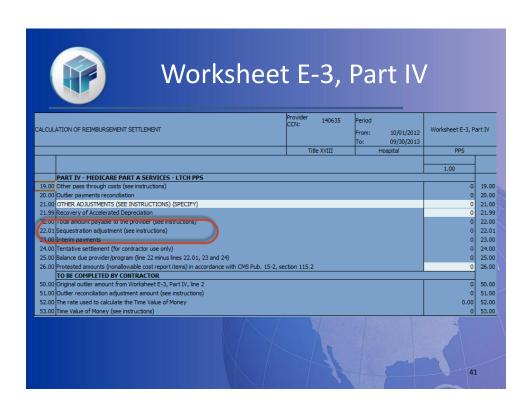


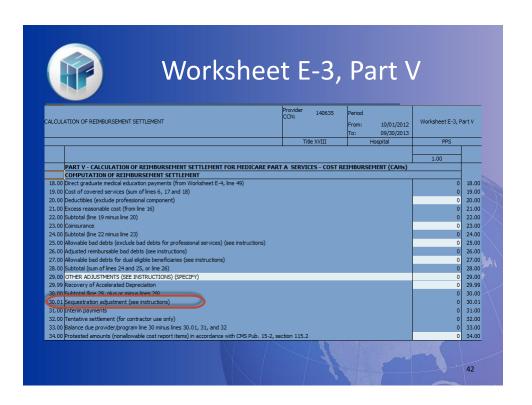


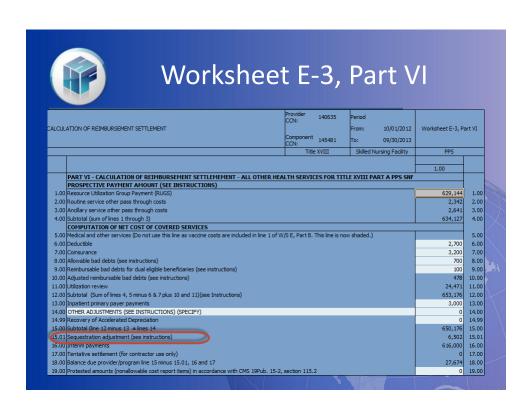


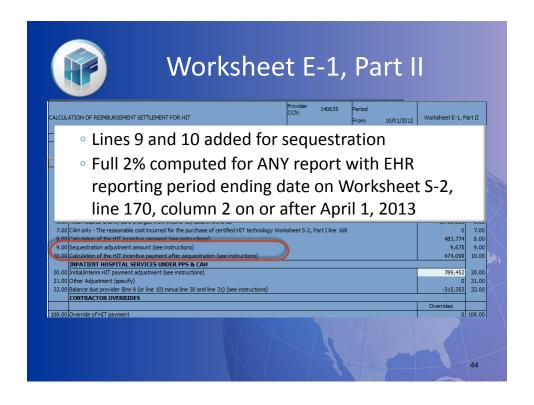


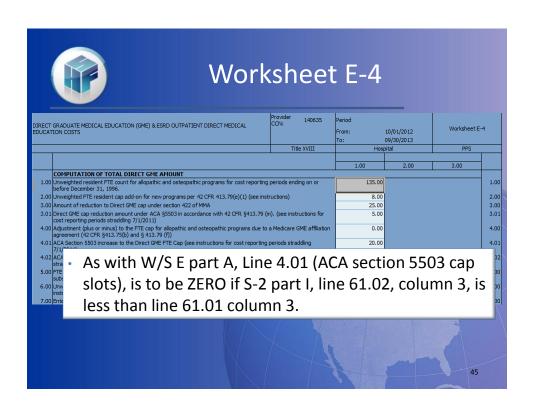


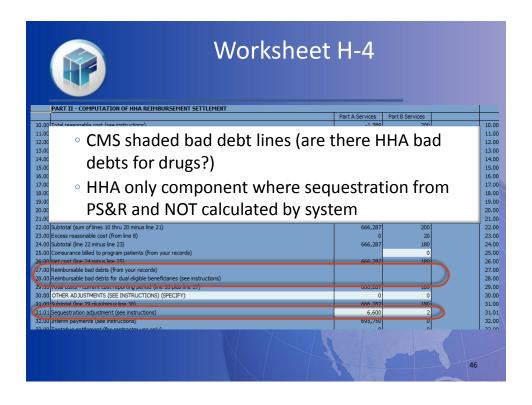


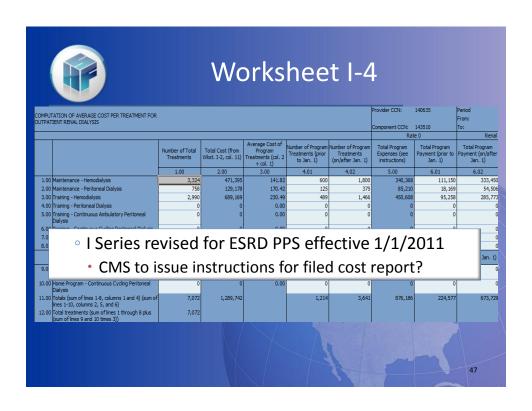


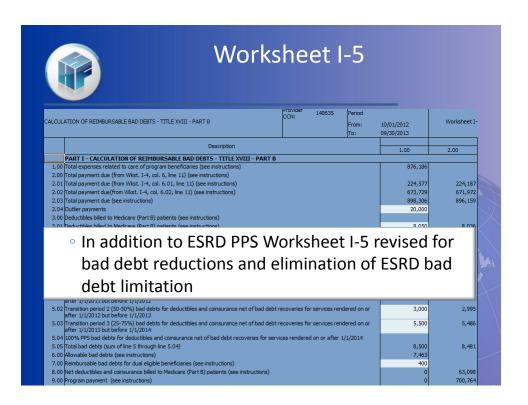














### Form 2540-10 T-5

The SNF, 2540-10 system was updated to Transmittal 5 by CMS, in May 2013. Transmittal 5 is effective for FY overlapping 4/1/2013, for the Sequestration reduction (i.e. all FYE on or after 4/1/2013 MUST use Transmittal 5). In addition Transmittal 5 includes bad debt changes effective for FY Begin on or after 10/1/2012.

- HFS was approved for Transmittal 5 on July 31, 2013.
- Transmittal 5 changes included:
  - CMS revised Worksheet S-2, Part I, line 43 to only identify providers with Home Office cost allocations. If line 43 is answered as "Y", line 44 and 45-47 must also be completed. If a provider has related organization costs but no home office, Worksheet S-2, Part I, line 18 will be answered "Y", but line 43 would be "N".
  - CMS clarified that Worksheet D-1, Part II, is not applicable to Titles V or XIX.
  - CMS modified various settlement worksheets to introduce the 2% Sequestration reduction for services on or after 4/1/2013.
    - This change is to implement section 251A of the Balanced Budget and Emergency Deficit Control Act
    - Sequestration will be computed as days on or after 4/1/2013 divided by total days in the FY, times 2%. Thus, a 6/30/2013 FYE would have about a half percent reduction. Worksheets impacted include, Worksheet E, Part I (lines 14.99 and 28.99), Worksheet H-4 (line30.99), Worksheet I-3 (line 25.01) and Worksheet J-3 (line 17.01)

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# Form 2540-10 T-5 (cont.)

- §3101 of the Middle Class Tax Relief and Job Creation Act of 2012, reduced payments for bad debts as follows:
  - Non-dual eligible From 70% allowable to 65% allowable for cost reporting periods beginning during Federal fiscal year 2013 and subsequent fiscal years.
    - SNF dual Eligible for cost reporting periods beginning during FFY 2013, 88%, for cost reporting periods beginning during FFY 2014, 76%, for cost reporting periods beginning during FFY 2015 and Subsequent, 65%.
    - CMHC, RHC and ESRD for cost reporting periods beginning during FFY 2013, 88%, for cost reporting periods beginning during FFY 2014, 76%, for cost reporting periods beginning during FFY 2015 and Subsequent, 65%.
    - Worksheets impacted include, Worksheet E, Part I (lines 8 and 24.02), Worksheet I-3 (line 22.01) and Worksheet J-3 (line 13.01)
- CMS added level one edit 1046S to ensure that If line 43 is answered as "Y", line 44 and 45-47 must also be completed. Edit 1045S was eliminated to no longer requires that line 18 is answered "N".

10/18/2013



#### 1728-16 HHA Transmittal 16

The HHA, 1728-94 system was updated to Transmittal 16 by CMS, in May 2013. Transmittal 16 is effective for FY Beginning on or after 10/1/2012, for the Bad Debt changes (i.e. all FYB on or after 10/1/2012 MUST use Transmittal 16). Transmittal 16 changes included:

- HFS was approved for Transmittal 16 on 8/20/2013
- Transmittal 16 was primarily to implement the Bad Debt reduction changes as of FY Begin 10/1/2012, and the 2% Sequestration reduction for services on or after 4/1/2013. Sequestration will be computed as days on or after 4/1/2013 divided by total days in the FY, times 2%. Thus, a 6/30/2013 FYE would have about a half percent reduction. The Bad Debt reduction is 12% for FY Begin 10/1/2012 to 9/30/2013; 24% for FY Begin 10/1/2013 to 9/30/2014; and 35% for FY Begin 10/1/2014 and after.
- Bad Debts are N/A for the HHA component, but DO APPLY for an HHA based CMHC (W/S CM-3), or an HHA based RHC/FQHC (W/S RF-3). Sequestration applies to all components.
- The Sequestration reduction is computed on W/S D, part II, line 26, as 2% of the sum of lines 25 and 25.50; CM-3, line 23 (2% of line 22); or RF-3, line 24.01 (2% of line 24).
- The Bad Debt reduction is computed on W/S CM-3, line 17.01; and on RF-3, line 22.01.
- CMS clarified in T.16, the rounding standards to compute the Sequestration reduction.
- CMS activated in T.16, W/S D part II, line 26, to accommodate the 2% Sequestration reduction.

10/18/2013

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### 1728-16 HHA Transmittal 16

- Transmittal 16 changes included:
  - CMS added (codified) in T.16, W/S S-4 part I, line 16, column 3, to capture the Total Visits performed by Interns & Residents, to facilitate the calculation of GME pass through cost. This was already in the HFS system, per a CMS interim communication.
  - CMS added (codified) W/S RF-2, lines 7.01 (Medical Nutrition Therapist) and 7.02 (Diabetes Self-Management Training. This was already in the HFS system, per a CMS interim communication.
  - CMS added in T.16, W/S S part I, line 8.51 to determine if an approval was granted for an exception to the Productivity Standards.
  - CMS added in T.16, W/S CM-3 part II, lines 17.01 and 17.02, to implement the Bad Debt reduction.
  - CMS added in T.16, W/S RF-3, lines 22.01 and 22.02, to implement the Bad Debt reduction.
  - CMS clarified in T.16, various portions of the Electronic Specifications, which are to be followed by all Vendors.

10/18/2013



#### 265-11 ESRD Transmittal 2

The ESRD, 265-11 system was updated to Transmittal 2 by CMS, in June 2013. Transmittal 2 is effective for FY overlapping 4/1/2013, for the Sequestration reduction (i.e. all FYE on or after 4/1/2013 MUST use Transmittal 2). In addition Transmittal 2 includes bad debt changes effective for FY Begin on or after 10/1/2012.

- Transmittal 2 changes included:
  - Effective for cost reporting periods ending on or after 12/31/2012 ESRD facilities will no longer report statistics relating to Epoetin or Aranesp on Worksheet S-1 lines 14 and 15 respectfully. Instead all erythropoiesis stimulating agent (ESA) statistics will be reported on line 15.01-15.99. Each type of ESA administered should be reported as a separate subscript beginning with line 15.01.
  - Rebates taken on epoetin and aranesp purchased between 1/1/2011 and 12/31/2011 will be reported on Worksheet A-2, lines 19 and 20 respectively. Effective for purchase on or after 1/1/2012 rebates received for each ESA will be reported on Worksheet A-2, line 20.01 and subsequent subscripts of line 20.
  - The instructions to Worksheet D, Column 4.02 and 6.02, were clarified to indicate that
    these columns should be used to report services rendered on or after 1/1/2014, for cost
    reporting periods that straddle 1/1/2014.
  - Revised the instructions to Worksheet E, Part I line 7.03 to calculate total deductibles at 20% of net ESRD PPS payments (line 2.03 column 2) if the sum of lines 7-7.02 is less than 20% of line 2.03, column 2)

10/18/2013

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### 265-11 ESRD Transmittal 2

- Transmittal 2 changes included:
  - §3101 of the Middle Class Tax Relief and Job Creation Act of 2012, reduced payments for ESRD bad debts ESRD for cost reporting periods beginning during FFY 2013, 88%, for cost reporting periods beginning during FFY 2014, 76%, for cost reporting periods beginning during FFY 2015 and Subsequent, 65%. The bad debt reduction is implemented on Worksheet E, Part I, line 16. In addition, for cost reporting periods beginning on or after 1/1/2013, the ESRD bad debts will no longer be limited to the unrecovered costs for Medicare ESRD services.
  - Sequestration will be computed as days on or after 4/1/2013 divided by total days in the FY, times 2%. Thus, a 6/30/2013 FYE would have about a half percent reduction. Sequestration is implemented on Worksheet E, Part I, line 19.
  - CMS added level one edit 1000D to ensure total treatments on Worksheet D, column 1, line 11 are greater than -0-.
  - CMS added level one edit 1000E to ensure that if Medicare visits were reported on Worksheet D, columns 4-4.02, then Medicare payments on Worksheet E, Part I, line 1 must be greater than -0-.

10/18/2013



### 222-92 RHC/FQHC Transmittal 11

The RHC/FQHC, 222-92 system was updated to Transmittal 11 by CMS, in May 2013. Transmittal 11 is effective for FY overlapping 4/1/2013, for the Sequestration reduction (i.e. all FYE on or after 4/1/2013 MUST use Transmittal 11). In addition Transmittal 11 includes bad debt changes effective for FY Begin on or after 10/1/2012.

- Transmittal 11 was primarily to implement the Bad Debt reduction changes as of FY Begin 10/1/2012, and the 2% Sequestration reduction for services(FYE) on or after 4/1/2013. Sequestration will be computed as days on or after 4/1/2013 divided by total days in the FY, times 2%. Thus, a 6/30/2013 FYE would have about a half percent reduction. The Bad Debt reduction is 12% for FY Begin 10/1/2012 to 9/30/2013; 24% for FY Begin 10/1/2013 to 9/30/2014; and 35% for FY Begin 10/1/2014 and after.
- The Sequestration reduction is computed on W/S C, line 24.11, as 2% of the sum of lines 21 and 24.10.
- The Bad Debt reduction is computed on W/S C, line 24.10.
- CMS clarified in T.11, the rounding standards to compute the Sequestration reduction.

10/18/201

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## 222-92 RHC/FQHC Transmittal 11

- CMS added in T.11, W/S S part I, line 8.50 to capture the Visits performed by Interns & Residents, to facilitate the calculation of GME pass through cost.
- CMS added in T.11, W/S S part I, line 8.51 to determine if an approval was granted for an exception to the Productivity Standards.
- CMS added in T.11, W/S A, line 20.50, to provide for allowable GME pass through cost.
- CMS added in T.11, W/S A, line 53.50, to provide for non-allowable GME pass through cost.
- CMS clarified in T.11, W/S B part I, column 3, Productivity Standards.
- CMS added in T.11, W/S B part II, line 14.01, to provide for allowable GME pass through cost
- CMS added in T.11, W/S B part II, line 14.02, to identify net facility overhead cost.
- CMS added in T.11, W/S C part II, line 15.10, to accommodate allowable GME pass through
- CMS added in T.11, W/S C part II, line 24.02, to accommodate Tentative Settlement.
- CMS added in T.11, W/S C part II, line 24.10, to implement the Bad Debt reduction.
- CMS added in T.11, W/S C part II, line 24.11, to accommodate the 2% Sequestration reduction.
- CMS clarified in T.11, various portions of the Electronic Specifications, which are to be followed by all Vendors.

10/18/201



### CMHC 2088-92 Transmittal 8/9

The CMHC, 2088-92 system was updated to Transmittal 8/9 by CMS, in April 2013. Transmittal 8 is effective for FY Beginning on or after 10/1/2012, for the Bad Debt changes (i.e. all FYB on or after 10/1/2012 MUST use Transmittal 8/9).

- HFS was approved for Transmittal 8/9 on 8/13/2013.
- Transmittal 8/9 was primarily to implement the Bad Debt reduction changes as of FY Begin 10/1/2012, and the 2% Sequestration reduction for services on or after 4/1/2013. Sequestration will be computed as days on or after 4/1/2013 divided by total days in the FY, times 2%. Thus, a 6/30/2013 FYE would have about a half percent reduction. The Bad Debt reduction is 12% for FY Begin 10/1/2012 to 9/30/2013; 24% for FY Begin 10/1/2013 to 9/30/2014; and 35% for FY Begin 10/1/2014 and after.
- The Sequestration reduction is computed on W/S D, part I, line 17.01, as 2% of line
- The Bad Debt reduction is computed on W/S D, line 11.02.
- CMS clarified in T.8/9, the rounding standards to compute the Sequestration reduction.
- CMS clarified in T.8/9, various portions of the Electronic Specifications, which are to be followed by all Vendors.

10/18/2013

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#### OPO 216-94 Transmittal 5

The OPO, 216-94 system was updated to Transmittal 5 by CMS, in April 2013. Transmittal 5 is effective for FY overlapping 4/1/2013, for the Sequestration reduction (i.e. all FYE on or after 4/1/2013 MUST use Transmittal 5). Bad debts are N/A in the OPO, so the Bad Debt changes effective for FY Begin on or after 10/1/2012, are moot.

- HFS was approved for Transmittal 5 on April 24, 2013.
- Transmittal 5 was primarily to introduce the 2% Sequestration reduction for services on or after 4/1/2013. This will be computed as days on or after 4/1/2013 divided by total days in the FY, times 2%. Thus, a 6/30/2013 FYE would have about a half percent reduction.
- The Sequestration reduction is computed on W/S D, line 6, as 2% of line 5. If line 5
  is negative, no reduction is computed.
- CMS clarified in T.5, the rounding standards to compute the Sequestration reduction.
- CMS clarified in T.5, that W/S S part I, line 4 is to be subscripted as line 4.01 if the
  provider is an OPO and a Lab.

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- CMS clarified in T.5, various portions of the Electronic Specifications, which are to be followed by all Vendors.
- CMS clarified in T.5, that W/S A line 19 is to be subscripted, and line 20 is NOT used, for FY Begin 5/1/2012 and after. Lines 9 and 21 are to be subscripted as needed.
- CMS clarified in T.5, that W/S A line 8, and W/S B column 6, must be subscripted similarly.
- CMS clarified in T.5, that W/S A line 19 and subscripts, will transfer to W/S B, line 9, and subscripts. Same for W/S A line 25 and W/S B line 14.
- W/S B line 15 is not to be used for FY Begin 5/1/2012 and after.
- CMS clarified in T.5, that W/S C, parts I and II, line 3, is calculated and rounded to 6 decimal places.
- CMS clarified in T.5, various portions of the Electronic Specifications, which are to be followed by all Vendors.

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#### **VENDOR APPROVAL LISTING**

Effective for FYE Overlapping 4/1/2013 and/or FY Begin on or after 10/1/2012

SYSTEM	VENDOR	APPROVED					
Hospital, 2552-10, Transmittal #4 Ver. 4.1.147.0	HFS, C05 KPMG C01	??					
SNF, 2540-10, Transmittal #5 Ver. 5.1.146.0	HFS, C05 KPMG, C01 Optimizer, C02 Progressive Provider Services (PPS), C31	7/31/2013 7/31/2013 7/31/2013 8/19/2013					
ESRD, 265-11, Transmittal #2 Ver. 2.1.146.0	HFS, B05 KPMG, B01	8/5/2013 8/9/2013					
RHC/FQHC, 222-92, Transmittal #11 Ver. 11.1.146.0	HFS, D05 KPMG, B01	8/5/2013 8/9/2013					
HHA, 1728-94, Transmittal #16 Ver. 16.1.146.0	HFS, J05 PPS, J31 Optimizer, J02 KPMG, J01	8/20/2013 8/20/2013 8/27/2013 8/30/2013					

