

PUBLICATION

FY 2012 Wage Index Appeals Due Soon [Ober|Kaler]

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Each year CMS includes its final wage index numbers as part of its final inpatient prospective payment system rule for acute care hospitals. CMS included the FY 2012 wage index numbers in the display copy of the rule posted on its website on August 1, 2010, and formally published in the August 18, 2011 Federal Register. Providers have 180 days to appeal their wage index numbers. The 180-day appeal period has historically been calculated to run from publication in the Federal Register, which would allow appeals for the FY 2012 wage indices to be filed by February 14, 2012. Providers that wish to operate under an abundance of caution may want to file their appeals by January 28, 2012, which uses the earlier date, when CMS posted the display copy on the internet, as the start date for the running of the 180 days.

Issues that have been the topic of appeals in recent years, and which providers may want to consider appealing for FY 2012, include the calculation of pension costs, the identification of non-allowable costs, and the exclusion of short-term disability hours. Providers should also consider appealing errors in their wage index attributable to errors in data from other providers in the same core-based statistical areas (CBSA); group appeals can be formed for this purpose.