

## **Analysis of ASCA Compliance Plans for Implementing HIPAA Transactions and Codes Standards**

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In the Administrative Simplification Compliance Act (ASCA) enacted on December 27, 2001, Congress extended mandatory compliance with the Health Insurance Portability and Accountability Act (HIPAA) of 1996 Transactions and Codes Rule until October 16, 2003. This extension was automatically granted provided that each entity covered by HIPAA and desiring an extension submitted a plan no later than October 16, 2002, to the Secretary of Health and Human Services (HHS). Specifically, the plan was to show how the entity will come into compliance with the HIPAA requirements. ASCA also directed the Secretary to furnish the National Committee on Vital and Health Statistics (NCVHS) with a sample of the plans submitted in response to ASCA, and NCVHS to undertake analysis of the sample. Specifically, Congress directed NCVHS to “regularly publish, and widely disseminate to the public, reports containing effective solutions to compliance problems identified in the plans analyzed...” This paper reports on the analysis of those plans.

In February 2003, the Centers for Medicare and Medicaid (CMS) delivered to NCVHS the entire population of 548,644 responses containing compliance plans, with identifying information deleted to protect confidentiality. Analysis of the responses revealed that providers accounted for 91.4 percent of the respondents, health plans, 6.5 percent, and clearinghouses, 1 percent. A more complete description of the population and their characteristics is presented below.

With regard to learning about effective solutions to compliance problems based on the plans analyzed, NCVHS finds that the responses reveal important reasons for seeking more time for compliance. The reasons given for wanting an extension that would delay HIPAA compliance for a year were: need more implementation time (67.5 percent), waiting on vendor (47.1 percent) or clearinghouse (33.2 percent), need standards information (46 percent), need more testing time (40.6 percent), and other reasons. Almost half of the respondents (49.3 percent) had not completed any of the three implementation phases—awareness, operational, and testing.

Information on effective solutions, however, is inferred only with an assumption that those furthest along with implementation have special characteristic that account for their completion of all phases (3.7 percent). The statistical results apply only to this small proportion of the total respondents and are also presented below.

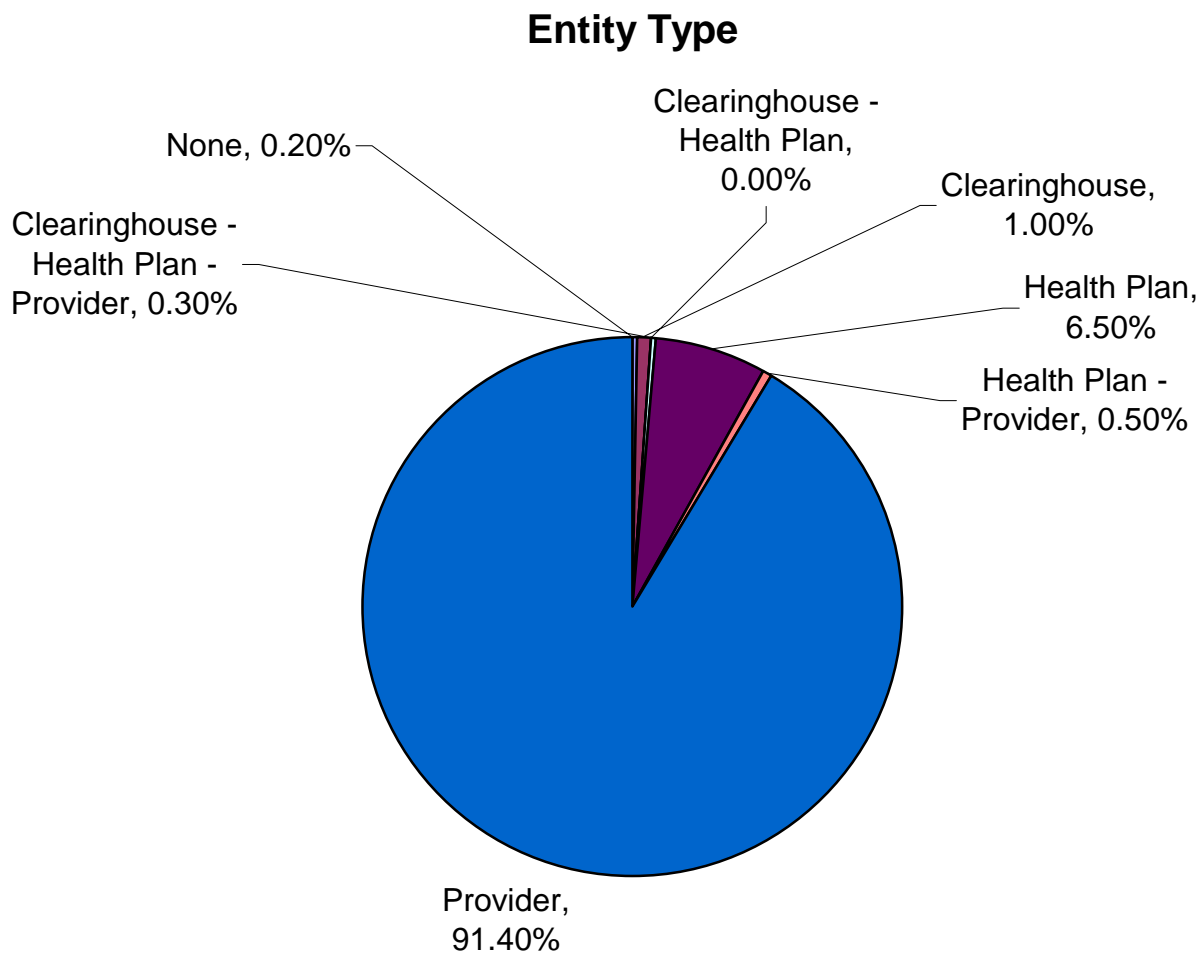
The Committee is aware of ongoing efforts on the part of CMS and (Workgroup for Electronic Data Interchange/Some National Implementation Plan (WEDI/SNIP) to develop and disseminate free technical assistance materials. These materials can provide valuable guidance for covered entities who are seeking solutions to compliance issues. These materials are available for review at: [www.cms.hhs.gov/hipaa/hipaa2](http://www.cms.hhs.gov/hipaa/hipaa2) (CMS materials) and [www.wedi.org/snip](http://www.wedi.org/snip) (WEDI/SNIP materials).

# ASCA Data Analysis

## Summary of Data:

**Table 1: ASCA Responders by Entity Type**

Entity Type	Percent	Number
Clearinghouse - Health Plan	0.0%	258
None	0.2%	1207
Clearinghouse - Health Plan - Provider	0.3%	1525
Health Plan - Provider	0.5%	2631
Clearinghouse	1.0%	5478
Health Plan	6.5%	35928
Provider	91.4%	501617
		548644



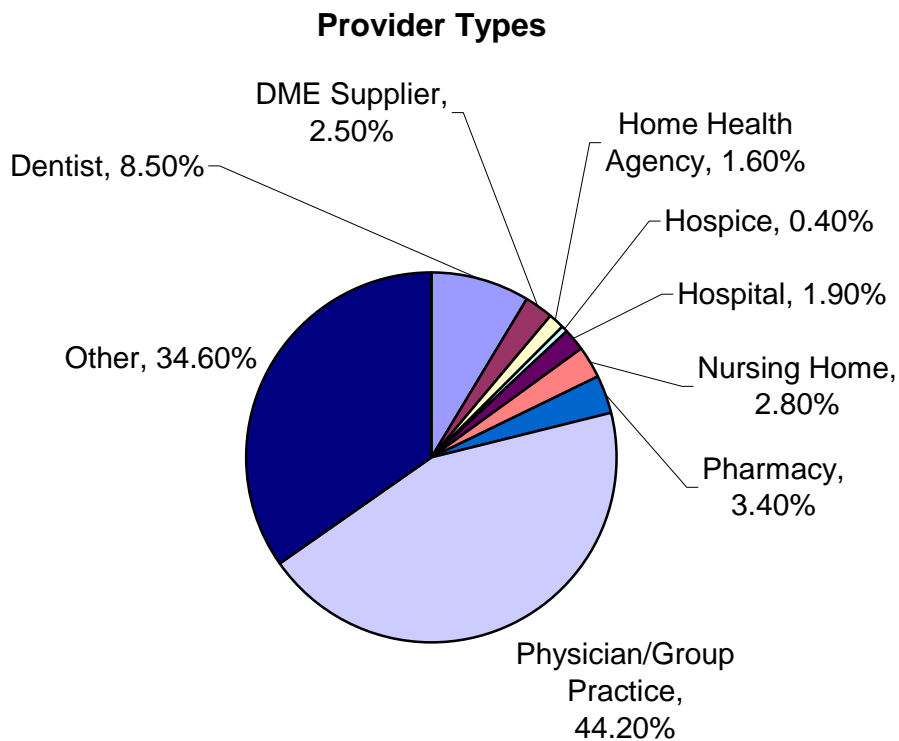
Data from just over one-half million respondents data were contained in the dataset received from the Center for Medicaid and Medicare Services (CMS). Over 90 percent of these were from providers, the 6 percent from health plans was the next largest category. Only 1 percent

identified themselves as a clearinghouse. A small percentage (1 percent) identified themselves as being multiple types or did not give a type.

**Provider Types:**

**Table 2: Responder Population by Provider Type**

Provider Type	ASCA Population		Used for HIPAA Impact Analysis		Difference	
	Percent	Number	Percent	Number	Percent	Number
Hospice	0.40%	1,459	0.29%	2,027	0.08%	568
Home Health Agency	1.60%	6,612	1.28%	8,900	0.33%	2,288
Hospital	1.90%	8,052	0.82%	5,685	-0.34%	-2,367
DME Supplier	2.50%	10,513	16.12%	112,200	14.61%	101,687
Nursing Home	2.80%	11,642	2.65%	18,439	0.98%	6,797
Pharmacy	3.40%	14,090	6.31%	43,900	4.28%	29,810
Dentist	8.50%	35,443	17.25%	120,000	12.15%	84,557
Other	34.60%	143,805	24.23%	170,673	3.86%	26,868
Physician/Group Practice	44.20%	183,692	30.75%	214,000	4.36%	30,308
Totals		415,308		695,824	40.31%	280,516



Two-thirds of the respondents gave some indication of provider type while one-third indicated “other.” Of the providers, slightly less than 50 percent were physicians or group practices and about one-third identified as “other.” Dentists formed the next largest group at just over 8 percent, followed in order by pharmacies, nursing homes, durable medical equipment suppliers, home health agencies, hospitals and hospices.

Essentially all the covered entities that recorded a specific provider type also self-classified themselves generally as a provider. Of the other entity types providers cross-associated themselves with health plans (2,631) and clearinghouse/health plans (1,525). While the distribution of groups that cross-identified tended to follow the overall provider distribution, hospitals were slightly over-represented (data not provided but available).

**Reason for Delay:**

The model extension request form gave 12 reasons for delay in implementing the HIPAA transactions and codes standards, from which a respondent could select any number of reasons. The median number of reasons selected was 3 with 90 percent (5 percent - 95 percent) of the respondents selecting between 2 and 7 reasons. Text answers were supplied by those responding in the “other” category but no analysis of this text was undertaken.

**Table 3: Number of Reason for Delay**

Number of Reasons	Number of Respondents
1	123,077
2	109,381
3	101,355
4	80,625
5	51,063
6	35,464
7	19,542
8	11,401
9	6,491
10	3,671
11	5,686
12	888

The overall distribution of reasons was as follows:

**Table 4: Distribution of Delay Reasons (Percent)**

Reason for Delay	Percent
Implementation Time	67.5
Waiting on Vendor	47.1
Standards Information	46.0
Testing Time	40.6
Clarification	34.5
Waiting on Clearinghouse	33.2
Money	16.6
Hardware	15.7
Staff	12.3
Data Requirements	9.4
Other	8.1
Codeset Implementation	6.7

Some of the common reasons for delay (waiting on clearinghouse and vendor) denote dependence on others and appear to be outside of the respondent’s control. Some can be, and in many cases have been, addressed by educational material (clarification and standards information). The length of calendar time before implementation and testing is completed also appears to be a major issue. Some of the time delay could be due to clearinghouses and vendors

waiting to change their administrative systems until the first-year changes to the Transactions and Code Rule were published in the *Federal Register* on February 20, 2003. Since the extension requests (with compliance plans) were due four months before the final changes to the standards were out, it is not possible to ascertain the impact of this lack of information on compliance implementation beyond the reporting of stated reasons for delay. Internal processes (hardware, staff and money) were reported less frequently as reasons for delay than system processes. Breakdowns of reasons for delay by provider type, entity type, and geographic (CMS) region are provided in the Appendix.

### **Estimated Cost**

**Table 5: Distribution of Estimated Cost Ranges (Percent)**

<b>Estimated Cost Range</b>	<b>Percent Respondents</b>
<\$10,000	35.9
\$10,000-\$100,000	20.0
\$100,000-\$500,000	5.1
\$500,000 - \$1Million	1.7
Over \$1Million	2.4
Don't Know	35.0

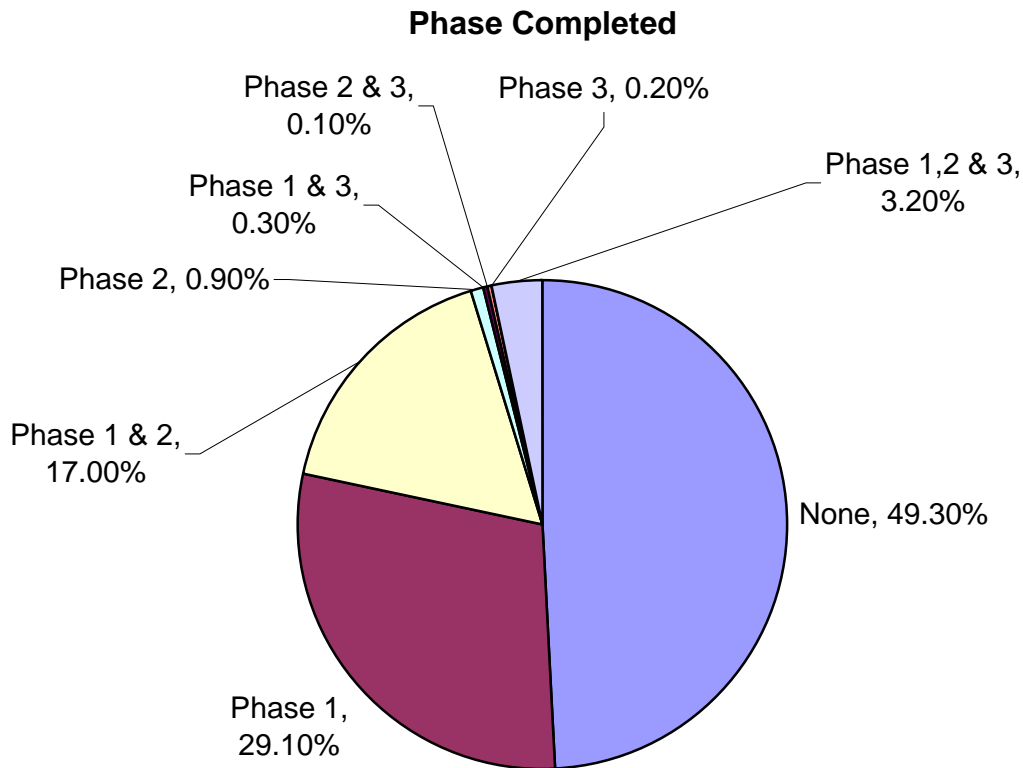
About one-third of the respondents didn't know the cost of implementing HIPAA transactions with about another one-third reporting it would be less than \$10,000. One-fifth thought it would cost between \$10,000 and \$100,000 and just over 9 percent thought it would cost more. Another 2.4 percent thought it would cost over \$1 million. Breakdowns of these estimates by provider type, entity type and region are found in the Appendix.

### **Process Steps**

The implementation process was divided into three phases in the extension application: Awareness (Phase 1), Operational (Phase 2) and Testing (Phase 3). The completion status of each phase as of the date of compliance plan reporting by the respondents in mutually exclusive categories is shown below:

**Table 6: Process Phase Completed**

<b>Phase Completed</b>	<b>Percent</b>	<b>Number</b>
None	49.3%	270377
Phase 1	29.1%	159691
Phase 1 & 2	17.0%	93054
Phase 2	0.9%	4994
Phase 1 & 3	0.3%	1610
Phase 2 & 3	0.1%	477
Phase 3	0.2%	947
Phase 1,2 & 3	3.2%	17494
		548644



Completion of testing (Phase III) was noted by 20,528 respondents (3.7 percent). Their reasons for delay and estimated cost broken down by phase completed are found in the Appendix and summarized later in this report.

Respondents gave the real or estimated start and end month and year for each phase. The length of each phase in days was estimated by assuming that the first day of the month was when the process was to start and also to end. These data are summarized below:

**Table 7: Estimated Days to Complete Process Phase**

Phase	Num	Days						
		Max	95%	75%	50%	25%	5%	Min
Awareness	208,414	335	273	122	61	0	0	0
Operational	444,941	3,257	550	365	184	92	0	0
Testing	531,140	3,136	487	212	153	90	0	0
Awareness to Testing	300,584	2,922	669	395	304	153	0	0

Note: Time from beginning of Awareness to Testing completion is a summary of the respondents' estimates of the time they require to complete the total process of three phases.

Transaction set implementation is to occur by October 16, 2003, for those requesting an extension and for small plans. Reporting actual date of phase ending was not requested (month

was but not day of the month). So, an implementation date of October 31, 2003, was measured against the testing end date, and 3.9 percent (21,435) of the respondents indicated implementation would not be completed until after that date. The Appendix contains detailed breakdowns of estimated times to completion of the various phases by these quartile ranges for provider and entity type as well as CMS region.

Status of key process steps were requested and are summarized below:

**Table 8: Status of Key Process Phases**

Process Step Completed	Yes		No		Started, Not Complete	
	Num	%	Num	%	Num	%
Review Current Process	32,793	7.5	182,749	41.9	220,047	50.5
Computer Software Development	18,614	3.5	286,205	53.9	226,581	42.6
Computer Staff Training	13,068	2.5	291,987	55.0	226,303	42.6

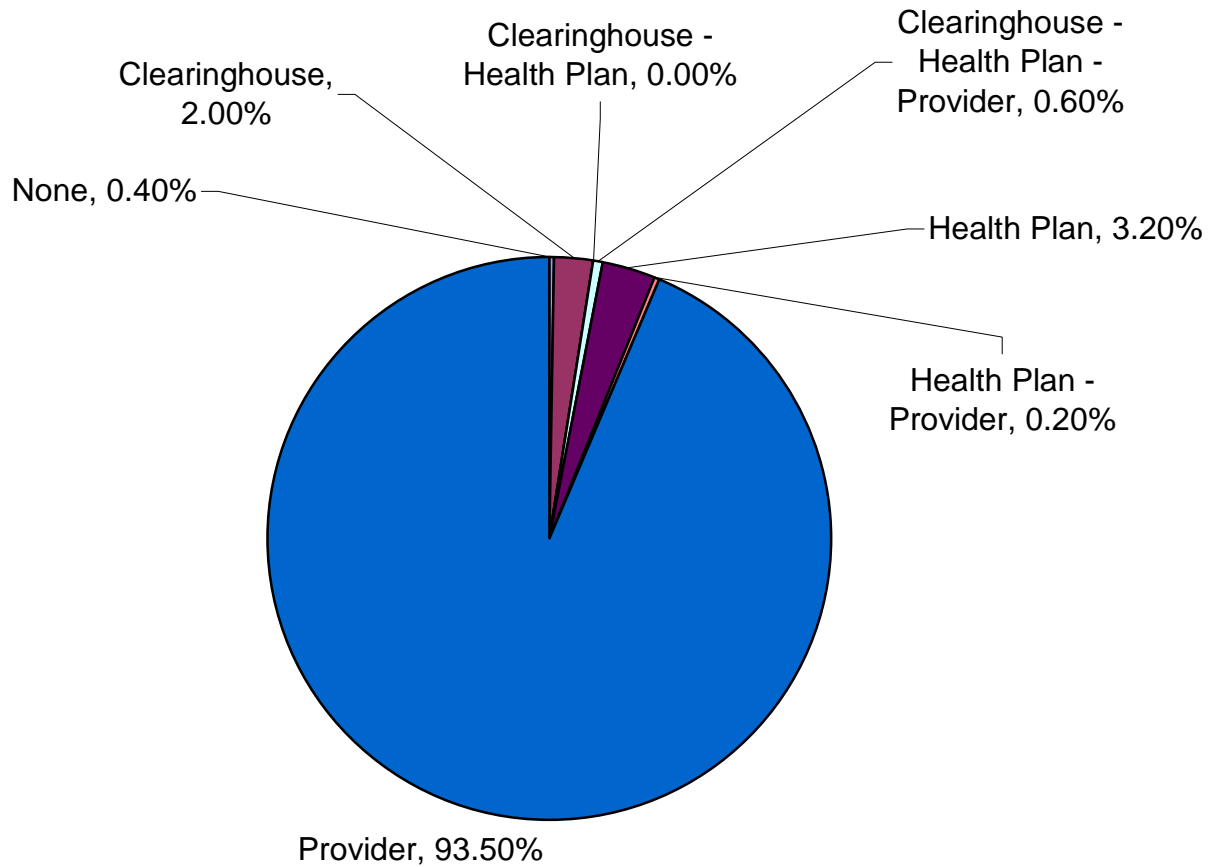
**Effective Solutions:**

One could assume, based on the various types of information requested, that those covered entities that had completed testing at the time of ASCA application adopted “effective solutions to the compliance problems identified in the plans analyzed.” Making this assumption, we ask, which of the reported characteristics are associated with a higher probability of completing testing. Understand that only 3.7 percent of respondents reported completing this phase and that they did not report what those “effective solutions” are.

**Table 9: Testing Completed Respondents by Entity**

Entity Type	Percent	Number (Testing Complete)
Clearinghouse - Health Plan	0.0%	7
Health Plan - Provider	0.2%	51
None	0.4%	87
Clearinghouse - Health Plan - Provider	0.6%	113
Clearinghouse	2.0%	418
Health Plan	3.2%	649
Provider	93.5%	19,203
Total by Entity		20,528

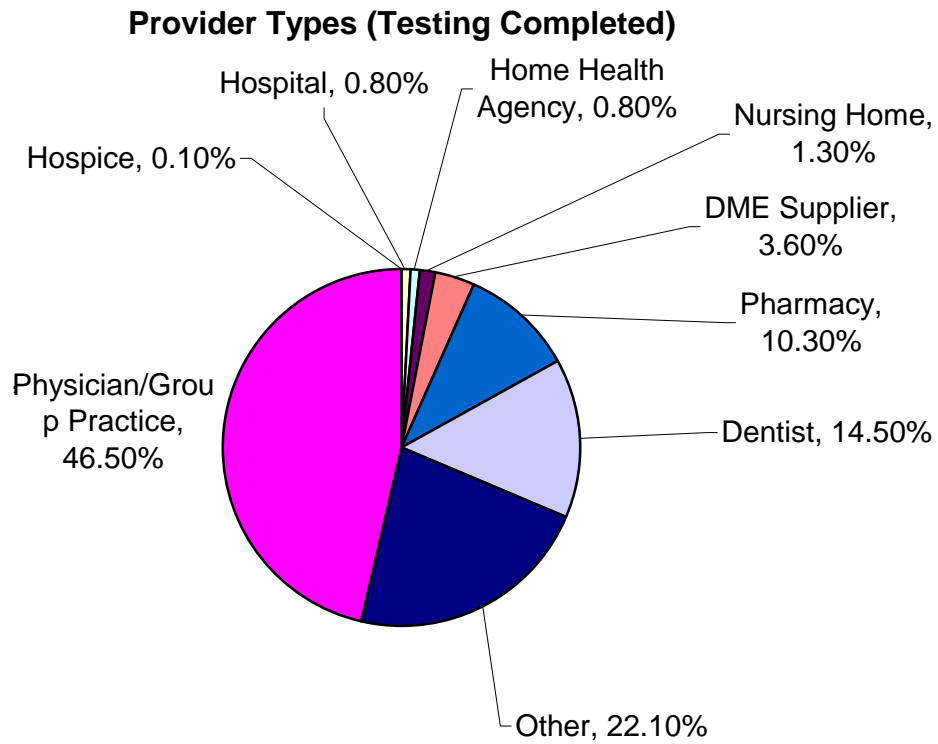
## Entity Type (Testing Complete)



**Table 10: Testing Completed Responders by Provider**

Provider	Percent	Number (Testing Complete)
Hospice	0.1%	25
Hospital	0.8%	151
Home Health Agency	0.8%	159
Nursing Home	1.3%	247
DME Supplier	3.6%	694
Pharmacy	10.3%	2007
Dentist	14.5%	2813
Other	22.1%	4307
Physician/Group Practice	46.5%	9051
<b>Total by Provider</b>		<b>19,454</b>





The median number of responses selected for those that completed testing was 1 with 90 percent (5 percent - 95 percent) of the respondents selecting between 1 and 4 reasons for delay. This is compared with 3, and between 2 and 7 reasons, respectively, for all entities reporting reasons for delay. Those entities with testing completed reported fewer reasons for delay.

**Table 11: Number of Reasons by those Completing Testing**

Testing Complete	
Number of Reasons	Number of Respondents
1	11,531
2	3,691
3	2,673
4	1,221
5	658
6	344
7	133
8	113
9	63
10	27
11	66
12	8

**Table 12: Reasons for Delay by those Completing Testing**

<b>Testing Complete</b>	
<b>Reason for Delay</b>	<b>Percent</b>
Implementation Time	37.0
Waiting on Vendor	32.4
Waiting on Clearinghouse	28.0
Testing Time	22.4
Standards Information	20.7
Clarification	17.5
Other	15.6
Money	6.7
Hardware	6.3
Staff	4.9
Data Requirements	3.9
Codeset Implementation	2.7

The table above shows a smaller percent of covered entities with testing complete, compared with a previous table for all the reporting entities, reporting reasons for delay, for each reason but the “other” category.

**Table 13: Estimated Cost Range by those Completing Testing (Percent)**

<b>Testing Complete</b>	
<b>Estimated Cost Range</b>	<b>Percent Respondents</b>
<\$10,000	53.6
\$10,000-\$100,000	15.3
\$100,000-\$500,000	1.7
\$500,000 - \$1Million	0.1
Over \$1Million	0.2
Don't Know	29.1

A greater percent of the testing complete respondents were in the lowest cost range, with smaller percents in the higher cost ranges, than for the reporting entities as a whole.

**Table 14: Estimated Days to Complete Process Steps by those Completing Testing**

<b>Phase (Testing Complete)</b>	<b>Num</b>	<b>Days</b>						
		<b>Max</b>	<b>95%</b>	<b>75%</b>	<b>50%</b>	<b>25%</b>	<b>5%</b>	<b>Min</b>
Awareness	2,368	335	214	92	28	0	0	0
Operational	3,968	2,556	548	365	181	31	0	0
Testing	3,024	2,284	426	184	153	31	0	0
Awareness to Testing	2,903	2,708	607	365	182	30	0	0

Note: Time from beginning of Awareness to Testing completion is a summary of the respondents’ estimates of the time they require to complete the total process of three phases.

The table above shows a smaller or equal number of days for each percent category reporting the days for each phase, when compared with the similar table for all reporting entities. Those who completed testing appear to have done so using fewer days for nearly every phase.

**Table 15: Key Process Step Status by those Completing Testing**

Process Step (Testing Complete)	Yes		No		Started, Not Complete	
	Num	%	Num	%	Num	%
Review Current Process	1,434	37.5	729	19.1	1,661	43.4
Computer Software Development	1,073	32.7	794	24.2	1,417	43.2
Computer Staff Training	835	25.8	895	27.6	1,512	46.6

Using October 31, 2003 as the estimated implementation date, 2.8 percent (565) of those completing testing indicated implementation would not be completed until after that date, compared with 3.9 percent for the population of reporting entities.

Additional details of the characteristics of the testing completed group similar to those details presented for the total reporting population may be found in the Appendix.

Logistic regression was used to find significant factors, and the calculated odds ratio was then employed to indicate the best predicting responses. Factors considered for association with testing completion were: entity type, estimated cost, number of delay reasons, provider type, use of a contractor, and geographic (CMS) region. Convergence at  $10^{-8}$  was achieved and testing for non-zero coefficients was significant ( $p < 0.0001$  by the Likelihood Ratio, Score and Wald). All coefficients were statistically significant in the model.

Note that the model used and the questions asked are not practice-oriented. Hence, no conclusions can be made concerning specific best practices, but inferences can be drawn about the characteristics of respondents who reported they have completed testing. Even these inferences should be drawn with care due to the small number of covered entities reporting that they have completed testing.

The results of this analysis are shown in the table below. This table presents those factor combinations, their odds ratios, and the 95 percent confidence interval. These results indicate factors that could be associated with being a successful early implementer:

**Table 16: Possible Factors associated with Early Implementers**

Factors	Odds Ratio	95% Confidence Limit
Clearinghouse vs Provider	3.517	2.354 – 5.254
Clearinghouse/Health Plan/Provider vs Provider	3.070	2.099 – 4.490
Less than \$10,000 vs Don't Know	1.661	1.536 – 1.795
\$10,000 - \$100,00 vs Don't Know	1.336	1.205 – 1.481
Dentist vs Other	1.283	1.116 – 1.476
DME Supplier vs Other	2.287	1.916 – 2.730
Hospital vs Other	1.470	1.064 – 2.031
Pharmacy vs Other	2.814	2.438 – 3.249
Physician/Group Practice vs Other	1.673	1.539 – 1.818
Use Contractor vs Undecided	1.802	1.674 – 1.940
Located in Region III vs Region X	1.381	1.118 – 1.706
Located in Region IX vs Region X	1.696	1.388 – 2.072
Located in Region V vs Region X	1.384	1.135 – 1.687
Located in Region VI vs Region X	1.432	1.164 – 1.762

Reporting that the entity is a clearinghouse or a clearinghouse/health plan/provider carries a three times greater likelihood that the entity will have completed testing than entities reporting they are providers. Likewise, reporting that the entity is a pharmacy or DME supplier carries more than two times greater likelihood of completing testing than the other provider category. Covered entities located in specific CMS geographic region categories (IX, VI, V, and III) were more likely to have completed testing than those located in region X.

### **Summary**

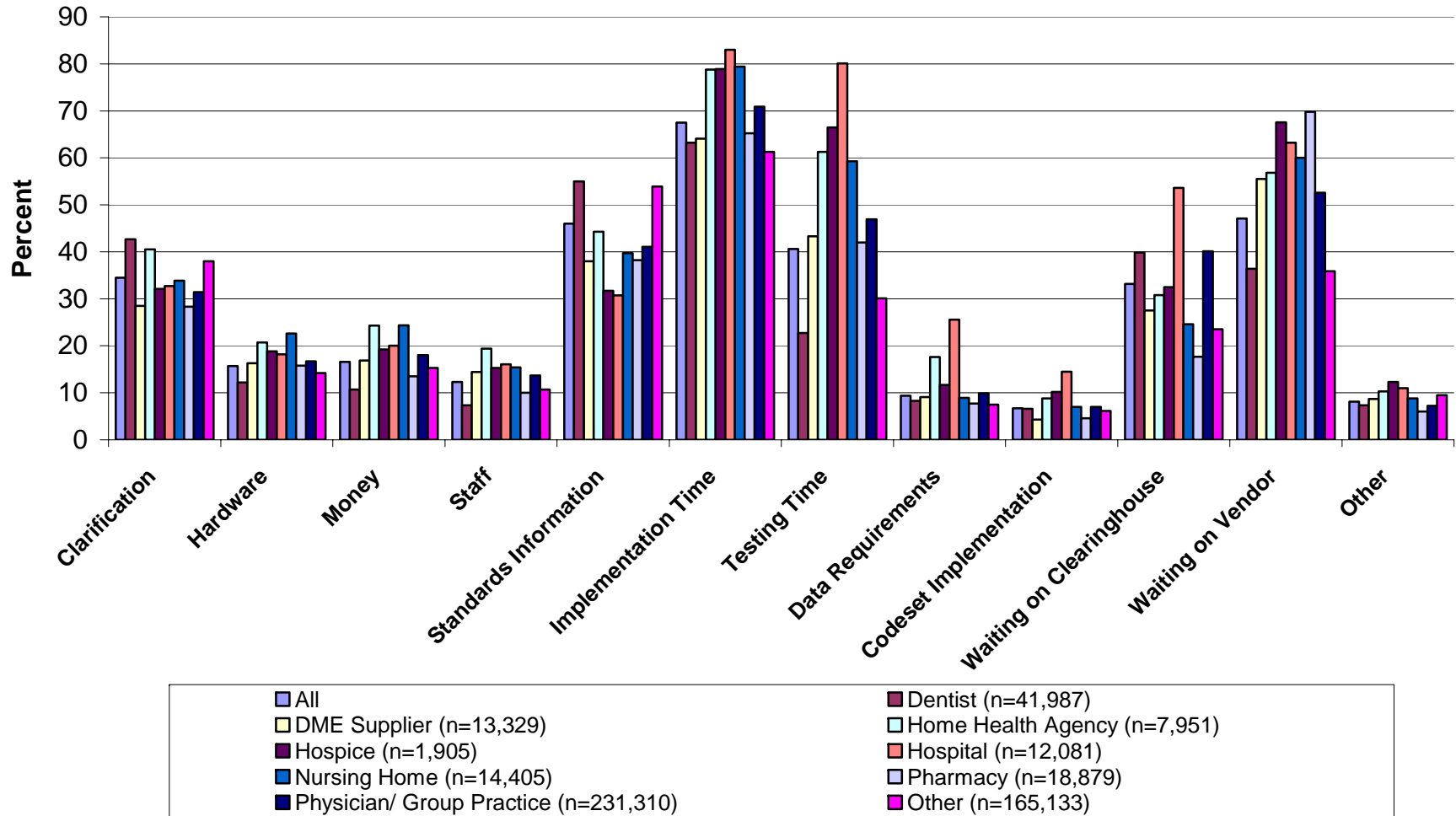
Overall, we have learned that most of the covered entities requesting an extension were providers. Further, those entities submitting requests and compliance plans said the time needed for implementation, waiting for vendors and clearinghouses, and needing standards information were the major reasons for seeking a year's extension in the HIPAA Transactions and Codes Rule mandatory compliance date. About half of the responders had not completed any of the three implementation phases. Those that had completed the testing phase, 3.7 percent of the responders, generally estimated the time for completing each phase to be a shorter number of days than did the requesters as a whole. Although the logistic regression statistical analysis was based on the small number of entities reporting they had completed testing, the results imply that clearinghouses and the reported combination clearinghouse/health plan/provider were more likely to have completed testing than providers. So also were pharmacies and DME suppliers compared with the other category of providers. Differences in the likelihood of completing testing by CMS geographic region were noted.

## APPENDIX MATERIAL

**Reason for Delay by Provider Type (Percent)**

	<b>All</b>	<b>Dentist</b>	<b>DME Supplier</b>	<b>Home Health Agency</b>	<b>Hospice</b>	<b>Hospital</b>	<b>Nursing Home</b>	<b>Pharmacy</b>	<b>Physician/ Group Practice</b>	<b>Other</b>
Clarification	34.5	42.7	28.5	40.5	32.1	32.7	33.9	28.3	31.4	38
Hardware	15.7	12.2	16.3	20.7	18.8	18.2	22.6	15.8	16.7	14.2
Money	16.6	10.7	16.9	24.3	19.2	20	24.4	13.5	18	15.3
Staff	12.3	7.3	14.4	19.4	15.3	16.1	15.4	10	13.7	10.7
Standards Information	46	55	38	44.3	31.7	30.7	39.7	38.2	41.1	53.9
Implementation Time	67.5	63.2	64.1	78.8	78.9	83	79.4	65.2	70.9	61.3
Testing Time	40.6	22.7	43.3	61.3	66.5	80.1	59.3	42	46.9	30.1
Data Requirements	9.4	8.3	9.1	17.6	11.7	25.6	8.9	7.7	9.9	7.5
Codeset Implementation	6.7	6.6	4.3	8.8	10.2	14.5	7	4.6	7	6.1
Waiting on Clearinghouse	33.2	39.8	27.5	30.8	32.5	53.6	24.6	17.7	40.1	23.5
Waiting on Vendor	47.1	36.4	55.5	56.8	67.6	63.2	60	69.8	52.6	35.9
Other	8.1	7.3	8.7	10.3	12.3	11	8.8	6	7.2	9.5

## Reasons for Delay by Provider Type

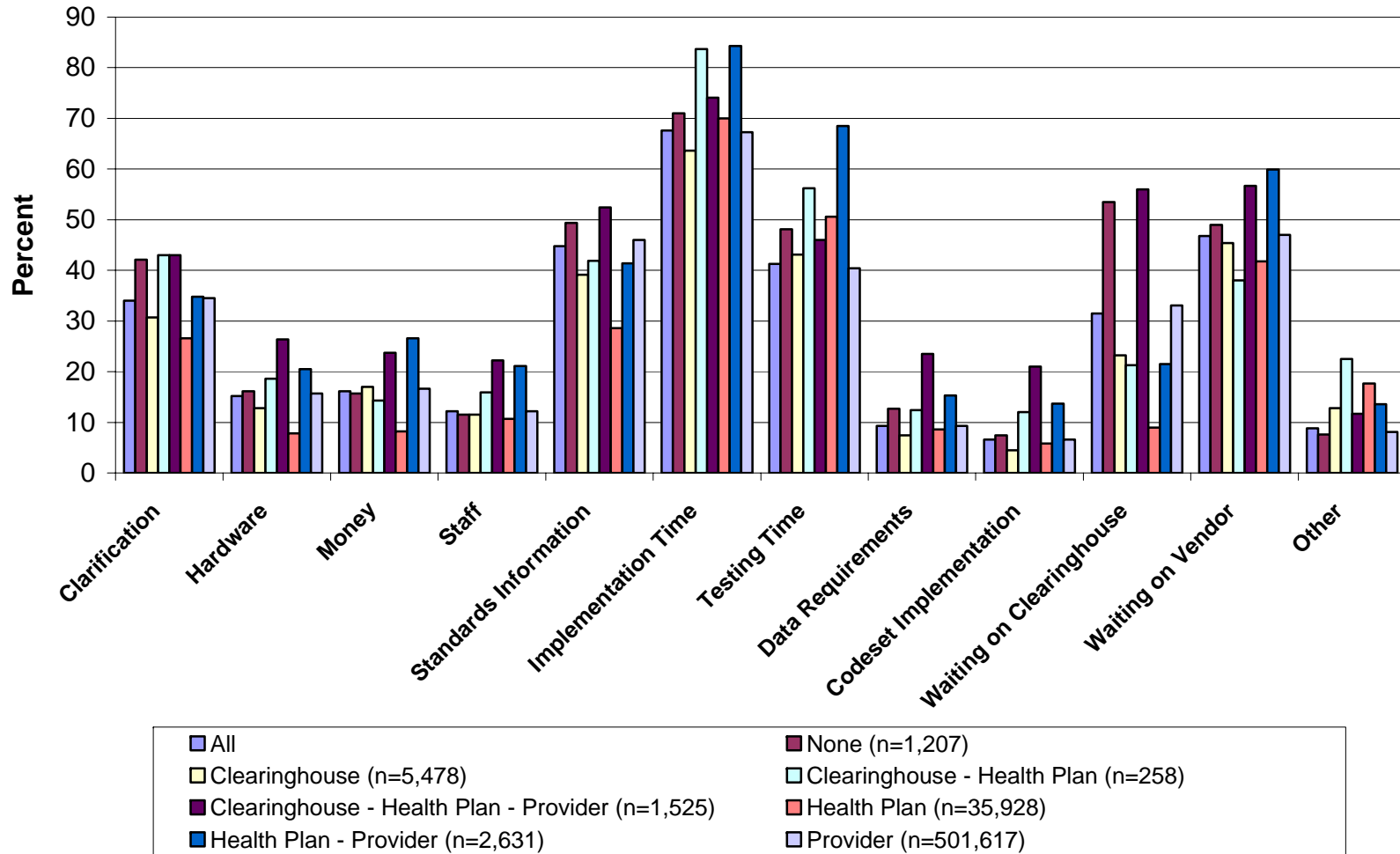


**Reasons for Delay by Entity Type (Percent)**

	<b>All</b>	<b>None</b>	<b>Clearinghouse</b>	<b>Clearinghouse - Health Plan</b>	<b>Clearinghouse - Health Plan - Provider</b>	<b>Health Plan</b>	<b>Health Plan - Provider</b>	<b>Provider</b>
Clarification	34	42.1	30.7	43	43	26.6	34.8	34.5
Hardware	15.2	16.1	12.8	18.6	26.4	7.8	20.5	15.7
Money	16.1	15.7	17	14.3	23.7	8.2	26.6	16.6
Staff	12.2	11.5	11.5	15.9	22.2	10.7	21.1	12.2
Standards Information	44.8	49.4	39.1	41.9	52.4	28.6	41.4	46
Implementation Time	67.6	71	63.6	83.7	74.1	70	84.3	67.3
Testing Time	41.3	48.1	43.1	56.2	46	50.6	68.5	40.4
Data Requirements	9.3	12.7	7.4	12.4	23.5	8.6	15.3	9.3
Codeset Implementation	6.6	7.4	4.5	12	21	5.8	13.7	6.6
Waiting on Clearinghouse	31.5	53.5	23.2	21.3	56	9	21.5	33.1
Waiting on Vendor	46.8	49	45.4	38	56.7	41.8	59.9	47
Other	8.8	7.6	12.8	22.5	11.7	17.7	13.6	8.1



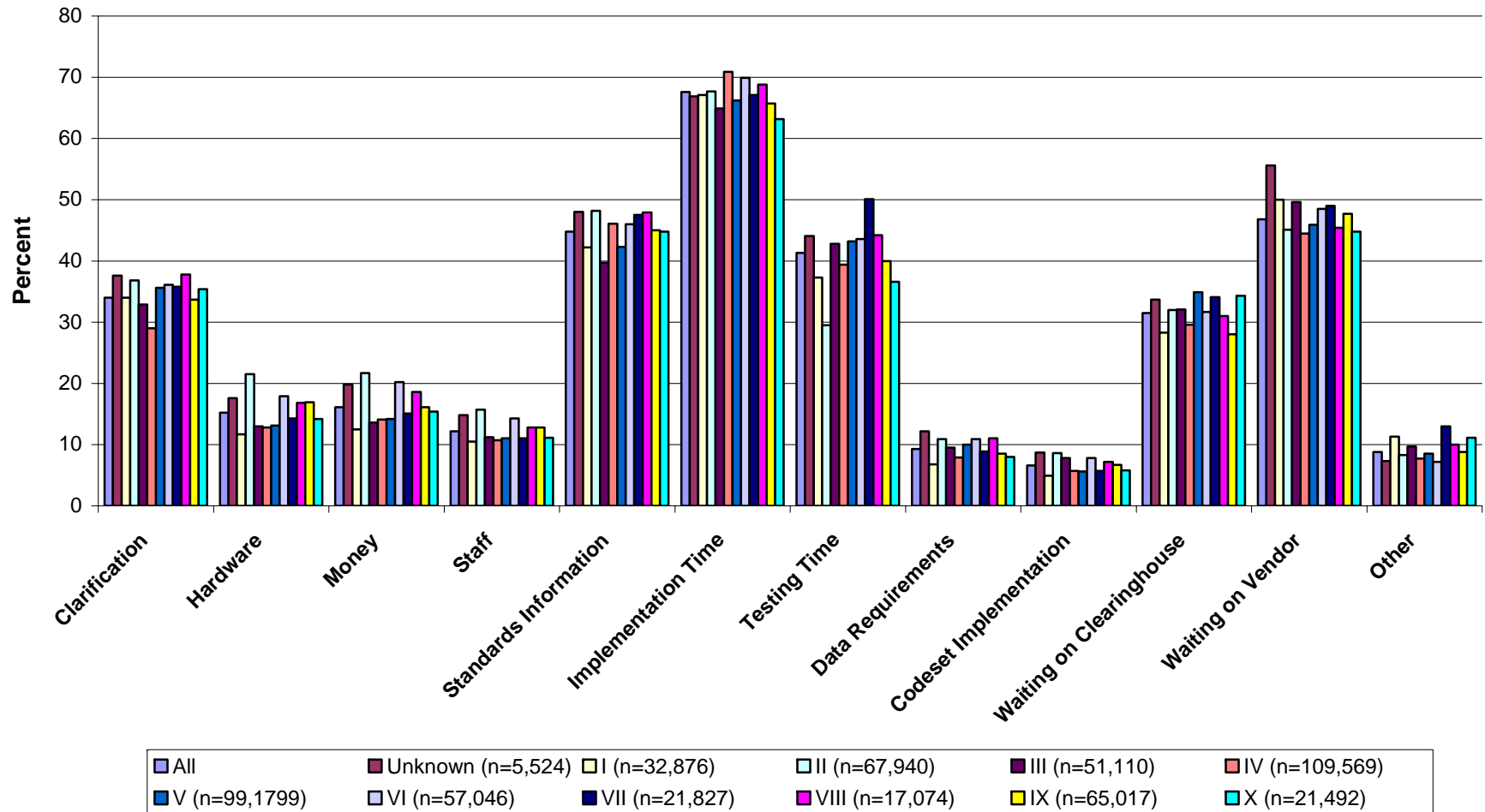
## Reasons for Delay by Entity Type



**Reason for Delay by CMS Region (Percent)**

	<b>All</b>	<b>Unknown</b>	<b>I</b>	<b>II</b>	<b>III</b>	<b>IV</b>	<b>V</b>	<b>VI</b>	<b>VII</b>	<b>VIII</b>	<b>IX</b>	<b>X</b>
Clarification	34	37.6	34	36.8	32.9	29	35.6	36.1	35.8	37.8	33.7	35.4
Hardware	15.2	17.6	11.7	21.5	13	12.8	13.1	17.9	14.3	16.8	16.9	14.2
Money	16.1	19.8	12.5	21.7	13.6	14.1	14.2	20.2	15.1	18.6	16.1	15.4
Staff	12.2	14.8	10.5	15.7	11.2	10.7	11	14.3	11	12.8	12.8	11.1
Standards Information	44.8	48	42.2	48.2	39.7	46.1	42.3	46	47.5	47.9	45	44.8
Implementation Time	67.6	66.9	67.1	67.7	64.9	70.9	66.2	69.9	67.1	68.8	65.7	63.2
Testing Time	41.3	44.1	37.3	29.5	42.8	39.4	43.2	43.6	50.1	44.2	40	36.6
Data Requirements	9.3	12.2	6.8	10.9	9.5	7.9	10	10.9	8.9	11	8.5	8
Codeset Implementation	6.6	8.7	4.9	8.6	7.8	5.7	5.6	7.8	5.7	7.2	6.7	5.8
Waiting on Clearinghouse	31.5	33.7	28.3	32	32.1	29.6	34.9	31.7	34.1	31	28	34.3
Waiting on Vendor	46.8	55.6	50	45.1	49.6	44.5	45.9	48.5	49	45.4	47.7	44.8
Other	8.8	7.3	11.3	8.3	9.7	7.7	8.5	7.2	13	10	8.8	11.1

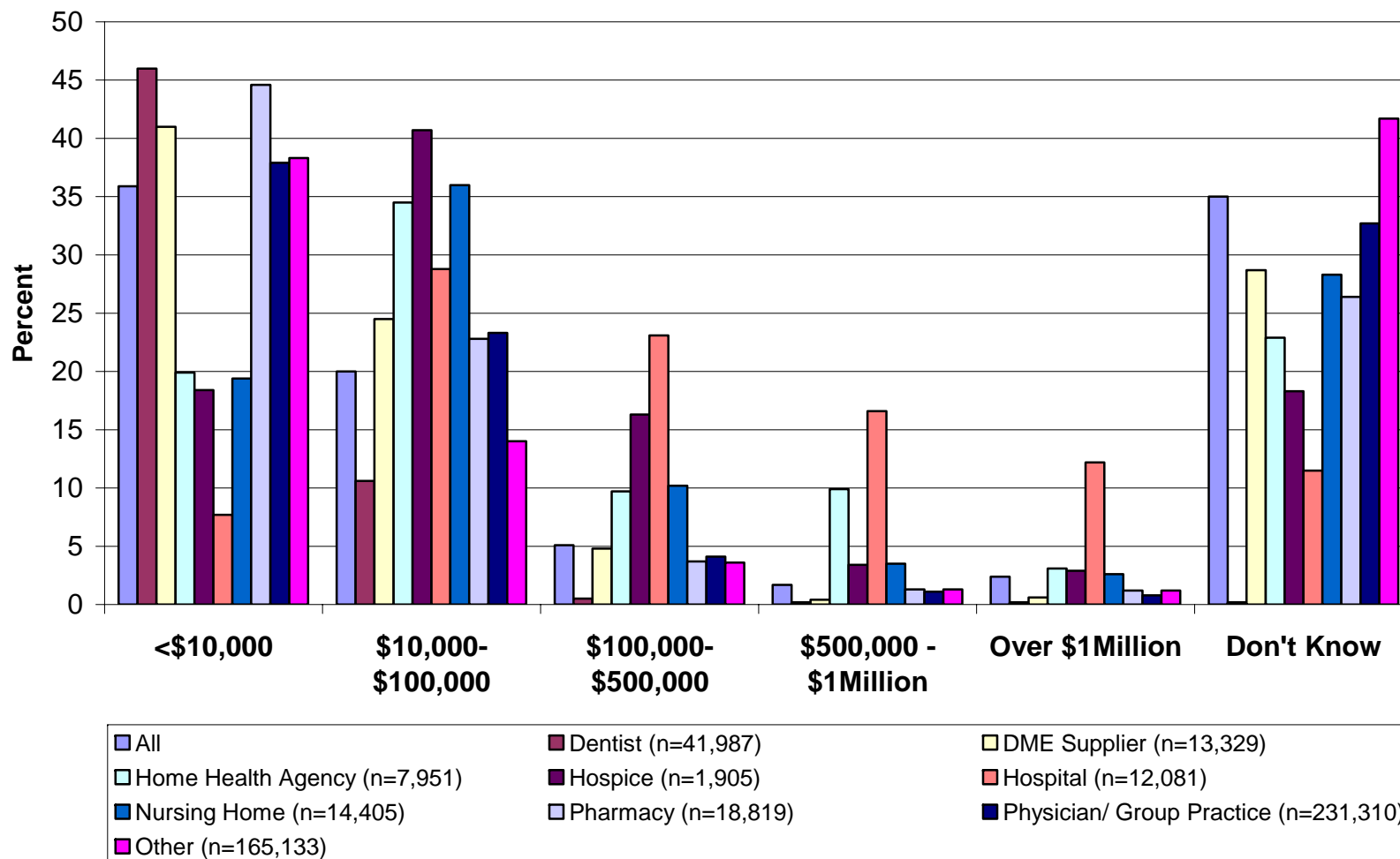
### Reasons for Delay by CMS Region



**Estimated Cost by Provider Type (percent)**

	<b>All</b>	<b>Dentist</b>	<b>DME Supplier</b>	<b>Home Health Agency</b>	<b>Hospice</b>	<b>Hospital</b>	<b>Nursing Home</b>	<b>Pharmacy</b>	<b>Physician/ Group Practice</b>	<b>Other</b>
<\$10,000	35.9	46	41	19.9	18.4	7.7	19.4	44.6	37.9	38.3
\$10,000-\$100,000	20	10.6	24.5	34.5	40.7	28.8	36	22.8	23.3	14
\$100,000-\$500,000	5.1	0.5	4.8	9.7	16.3	23.1	10.2	3.7	4.1	3.6
\$500,000 - \$1Million	1.7	0.2	0.4	9.9	3.4	16.6	3.5	1.3	1.1	1.3
Over \$1Million	2.4	0.2	0.6	3.1	2.9	12.2	2.6	1.2	0.8	1.2
Don't Know	35	0.2	28.7	22.9	18.3	11.5	28.3	26.4	32.7	41.7

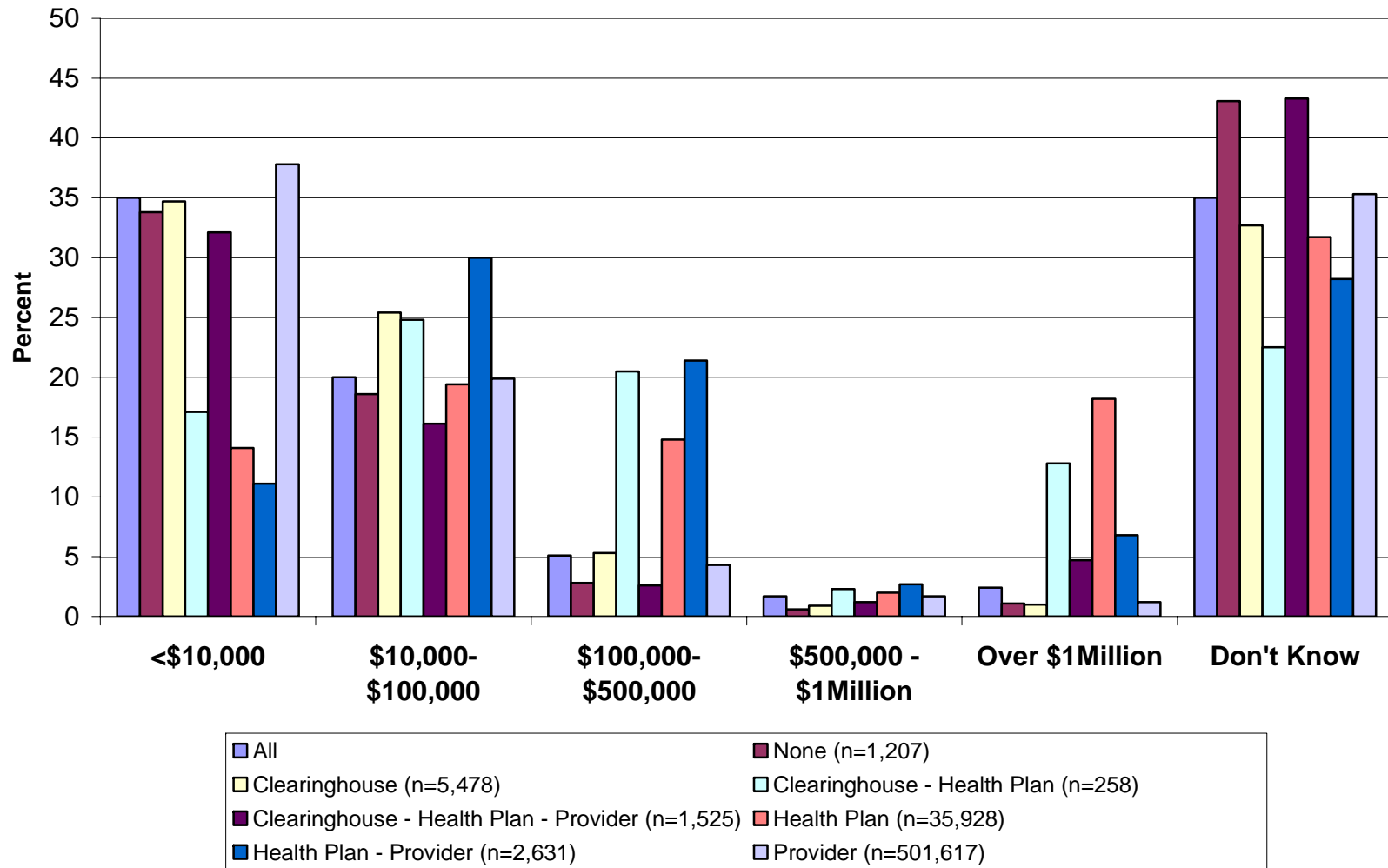
### Estimated Cost by Provider Type



**Estimated Cost by Entity Type (Percent)**

	<b>All</b>	<b>None</b>	<b>Clearinghouse</b>	<b>Clearinghouse - Health Plan</b>	<b>Clearinghouse - Health Plan - Provider</b>	<b>Health Plan</b>	<b>Health Plan - Provider</b>	<b>Provider</b>
<\$10,000	35	33.8	34.7	17.1	32.1	14.1	11.1	37.8
\$10,000-\$100,000	20	18.6	25.4	24.8	16.1	19.4	30	19.9
\$100,000- \$500,000	5.1	2.8	5.3	20.5	2.6	14.8	21.4	4.3
\$500,000 - \$1Million	1.7	0.6	0.9	2.3	1.2	2	2.7	1.7
Over \$1Million	2.4	1.1	1	12.8	4.7	18.2	6.8	1.2
Don't Know	35	43.1	32.7	22.5	43.3	31.7	28.2	35.3

### Estimated Cost by Entity Type

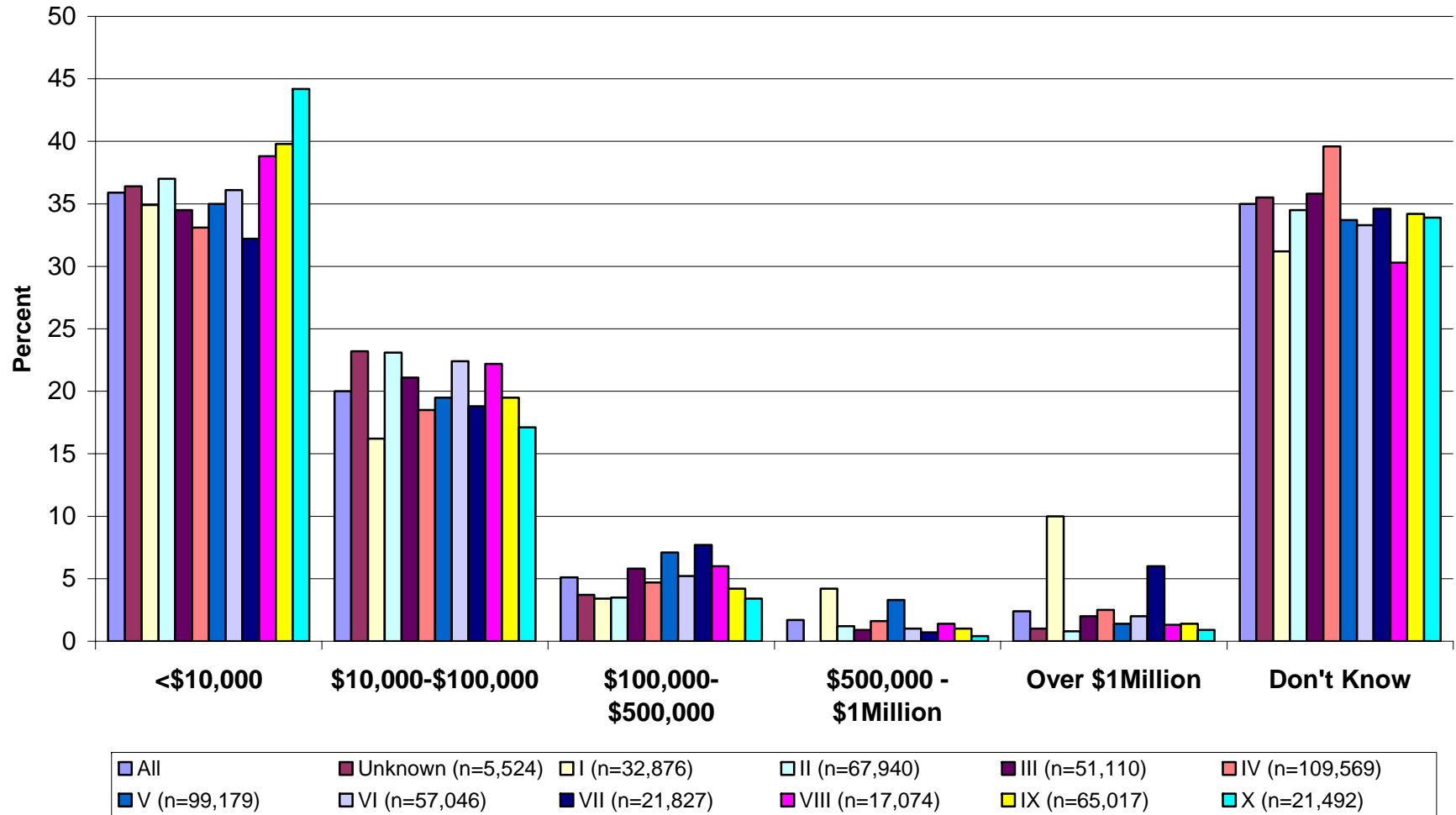


**Estimated Cost by CMS Region (Percent)**

	<b>All</b>	<b>Unknown</b>	<b>I</b>	<b>II</b>	<b>III</b>	<b>IV</b>	<b>V</b>	<b>VI</b>	<b>VII</b>	<b>VIII</b>	<b>IX</b>	<b>X</b>
<\$10,000	35.9	36.4	34.9	37	34.5	33.1	35	36.1	32.2	38.8	39.8	44.2
\$10,000-\$100,000	20	23.2	16.2	23.1	21.1	18.5	19.5	22.4	18.8	22.2	19.5	17.1
\$100,000-\$500,000	5.1	3.7	3.4	3.5	5.8	4.7	7.1	5.2	7.7	6	4.2	3.4
\$500,000 - \$1Million	1.7	0	4.2	1.2	0.9	1.6	3.3	1	0.7	1.4	1	0.4
Over \$1Million	2.4	1	10	0.8	2	2.5	1.4	2	6	1.3	1.4	0.9
Don't Know	35	35.5	31.2	34.5	35.8	39.6	33.7	33.3	34.6	30.3	34.2	33.9



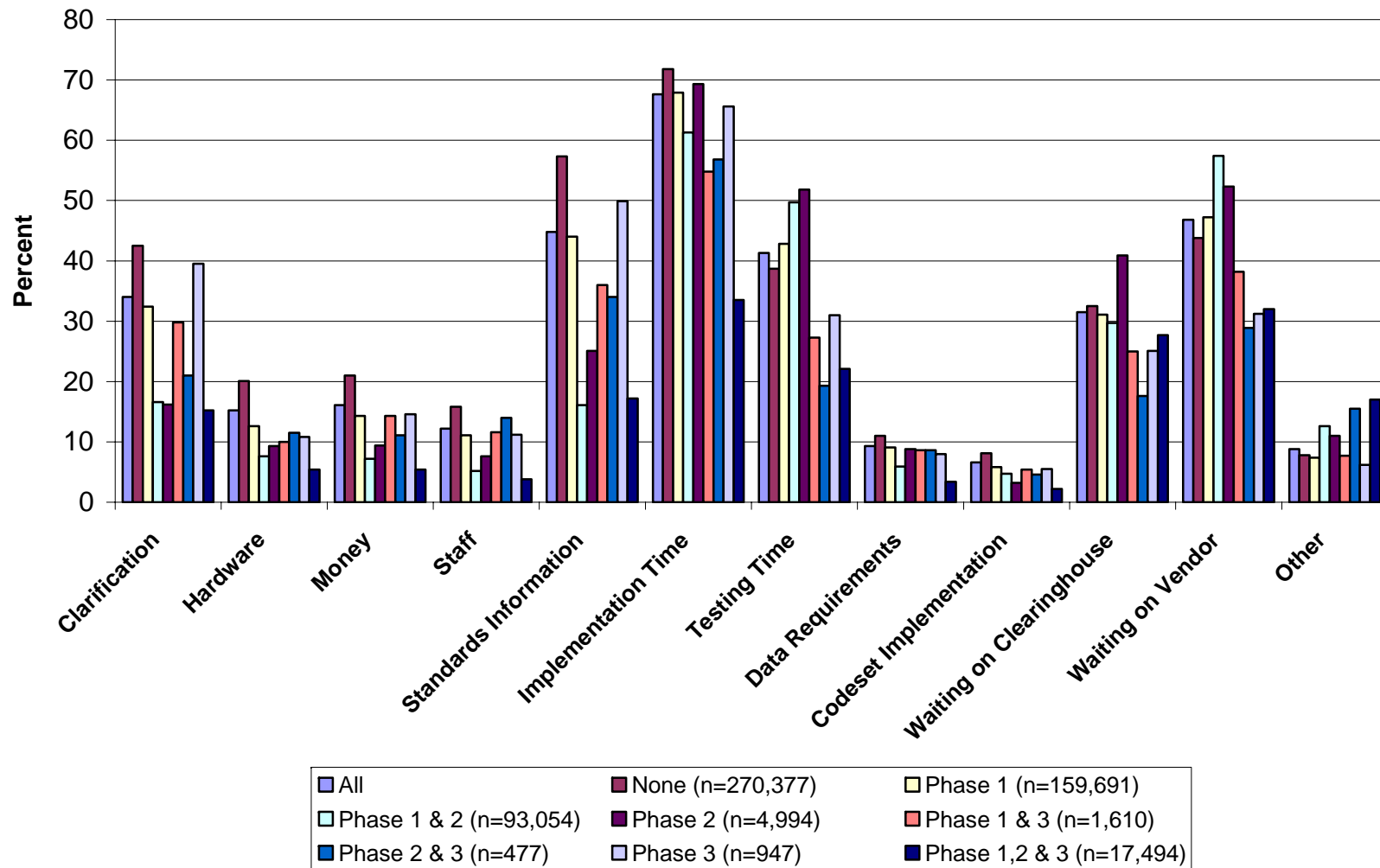
### Estimated Cost by CMS Region



**Reason for Delay by Phase Completed (Percent)**

	<b>All</b>	<b>None</b>	<b>Phase 1</b>	<b>Phase 1 &amp; 2</b>	<b>Phase 2</b>	<b>Phase 1 &amp; 3</b>	<b>Phase 2 &amp; 3</b>	<b>Phase 3</b>	<b>Phase 1,2 &amp; 3</b>
Clarification	34	42.5	32.4	16.6	16.2	29.8	21	39.5	15.2
Hardware	15.2	20.1	12.6	7.6	9.3	10	11.5	10.8	5.4
Money	16.1	21	14.3	7.2	9.4	14.3	11.1	14.6	5.4
Staff	12.2	15.8	11.1	5.2	7.6	11.6	14	11.2	3.8
Standards Information	44.8	57.3	44	16.1	25.1	36	34	49.9	17.2
Implementation Time	67.6	71.8	67.9	61.3	69.3	54.8	56.8	65.6	33.5
Testing Time	41.3	38.7	42.8	49.7	51.8	27.3	19.3	31	22.1
Data Requirements	9.3	11	9.1	5.9	8.8	8.6	8.6	8	3.4
Codeset Implementation	6.6	8.1	5.8	4.7	3.2	5.4	4.6	5.5	2.2
Waiting on Clearinghouse	31.5	32.5	31.1	29.7	40.9	25	17.6	25.1	27.7
Waiting on Vendor	46.8	43.8	47.2	57.4	52.3	38.2	28.9	31.2	32
Other	8.8	7.8	7.4	12.6	11	7.7	15.5	6.2	17

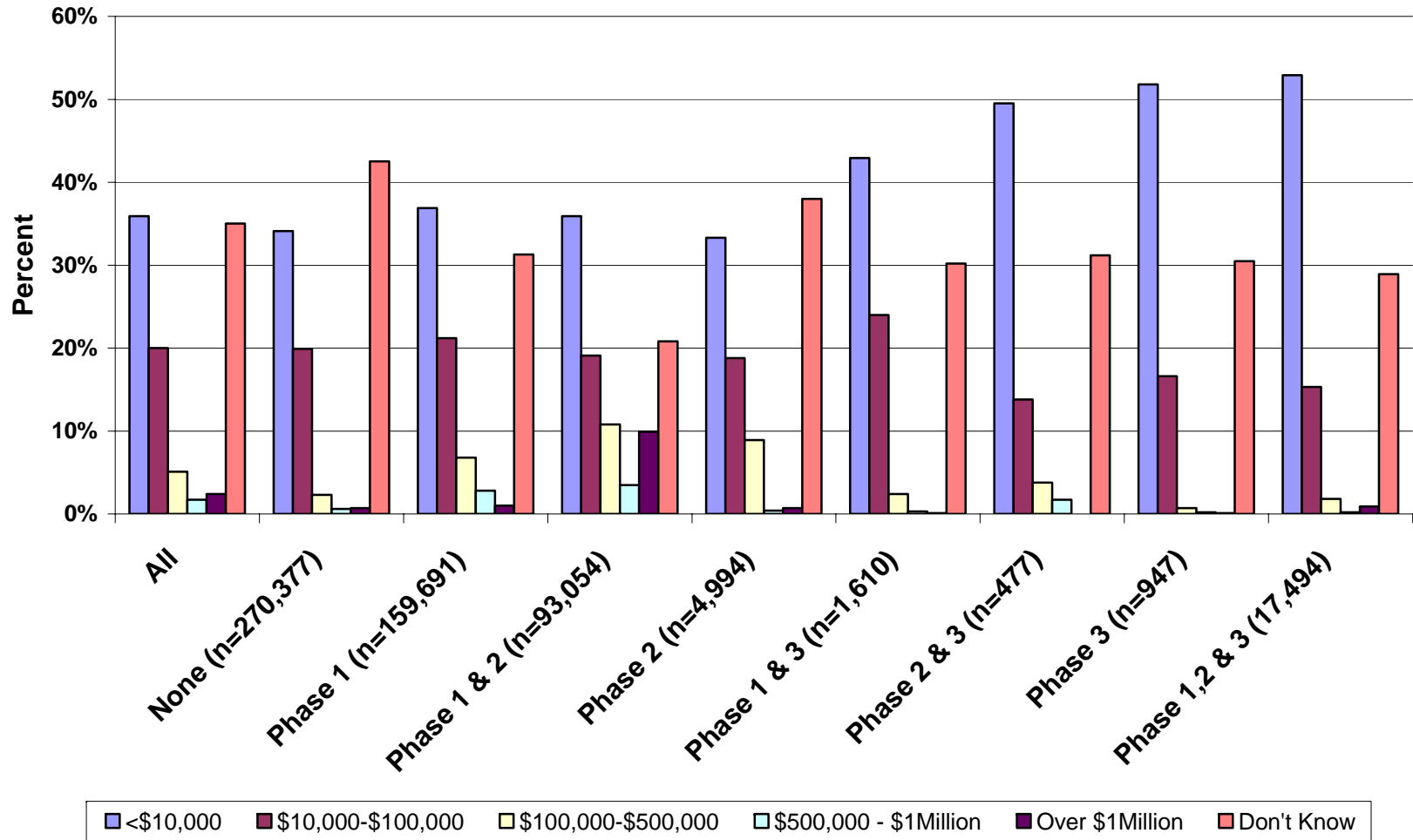
## Reasons for Delay by Phase Completed



**Estimated Cost by Phase Completed (Percent)**

	<b>All</b>	<b>None</b>	<b>Phase 1</b>	<b>Phase 1 &amp; 2</b>	<b>Phase 2</b>	<b>Phase 1 &amp; 3</b>	<b>Phase 2 &amp; 3</b>	<b>Phase 3</b>	<b>Phase 1,2 &amp; 3</b>
<\$10,000	35.9%	34.1%	36.9%	35.9%	33.3%	42.9%	49.5%	51.8%	52.9%
\$10,000-\$100,000	20.0%	19.9%	21.2%	19.1%	18.8%	24.0%	13.8%	16.6%	15.3%
\$100,000-\$500,000	5.1%	2.3%	6.8%	10.8%	8.9%	2.4%	3.8%	0.7%	1.8%
\$500,000 - \$1Million	1.7%	0.6%	2.8%	3.5%	0.4%	0.3%	1.7%	0.2%	0.2%
Over \$1Million	2.4%	0.7%	1.0%	9.9%	0.7%	0.1%	0.0%	0.1%	0.9%
Don't Know	35.0%	42.5%	31.3%	20.8%	38.0%	30.2%	31.2%	30.5%	28.9%

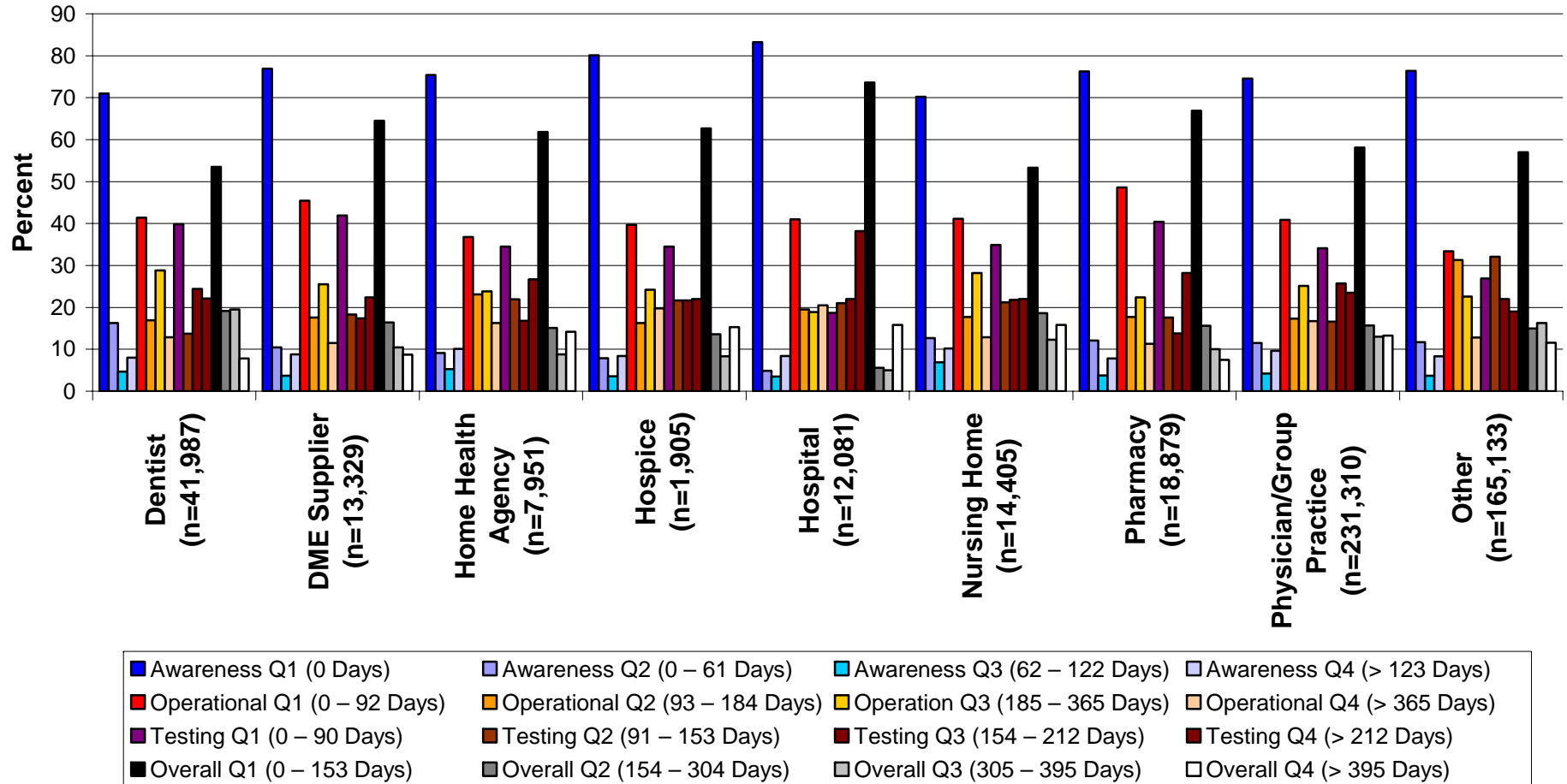
## Estimated Cost by Phase Completed



**Phase Quartile Day Range by Provider (Percent)**

Phase/Quartile	Dentist	DME Supplier	Home Health Agency	Hospice	Hospital	Nursing Home	Pharmacy	Physician/ Group Practice	Other
<b>Awareness</b>									
0 Days	71.0	76.9	75.4	80.1	83.2	70.2	76.3	74.6	76.4
0 – 61 Days	16.3	10.5	9.1	7.9	4.9	12.7	12.1	11.5	11.7
62 – 122 Days	4.7	3.7	5.3	3.6	3.5	6.9	3.8	4.2	3.7
> 123 Days	8.0	8.8	10.1	8.4	8.4	10.2	7.8	9.6	8.3
<b>Operational</b>									
0 – 92 Days	41.4	45.4	36.8	39.7	41.0	41.1	48.6	40.9	33.4
93 – 184 Days	16.9	17.6	23.1	16.3	19.5	17.7	17.7	17.3	31.3
185 – 365 Days	28.8	25.5	23.8	24.2	18.9	28.2	22.4	25.1	22.6
> 365 Days	12.9	11.5	16.3	19.8	20.5	12.9	11.3	16.7	12.8
<b>Testing</b>									
0 – 90 Days	39.8	41.9	34.5	34.5	18.7	34.9	40.4	34.1	26.9
91 – 153 Days	13.7	18.3	21.9	21.7	21.0	21.2	17.6	16.6	32.1
154 – 212 Days	24.4	17.4	16.8	21.7	22.0	21.8	13.8	25.7	22.0
> 212 Days	22.1	22.4	26.7	22.0	38.2	22.0	28.2	23.5	19.0
<b>Awareness to Testing</b>									
0 – 153 Days	53.5	64.5	61.8	62.7	73.6	53.3	6.9	58.1	57.0
154 – 304 Days	19.1	16.4	15.1	13.6	5.6	18.6	15.6	15.7	15.0
305 – 395 Days	19.5	10.5	8.8	8.3	5.0	12.3	10.0	13.0	16.3
> 395 Days	7.8	8.7	14.2	15.3	15.8	15.8	7.5	13.3	11.6

## Phase Quartile Day Range by Provider (percent)

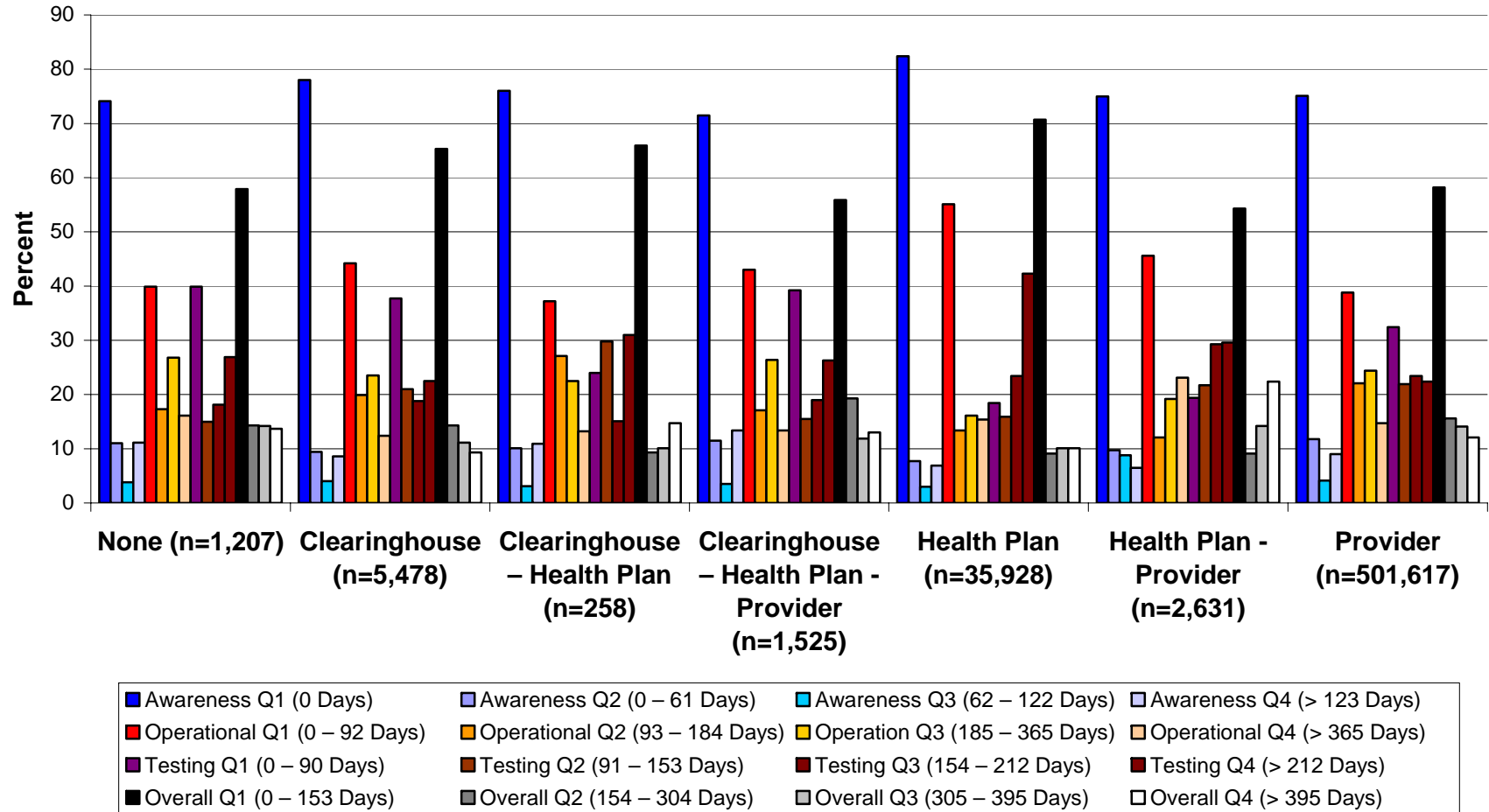


**Phase Quartile Day Range by Entity (percent)**

Phase/Quartile	None	Clearinghouse	Clearinghouse – Health Plan	Clearinghouse – Health Plan - Provider	Health Plan	Health Plan - Provider	Provider
<b>Awareness</b>							
0 Days	74.1	78.0	76.0	71.5	82.4	75.0	75.1
0 – 61 Days	11.0	9.4	10.1	11.5	7.7	9.7	11.8
62 – 122 Days	3.8	4.0	3.1	3.5	3.0	8.8	4.1
> 123 Days	11.1	8.6	10.9	13.4	6.9	6.5	9.0
<b>Operational</b>							
0 – 92 Days	39.9	44.2	37.2	43.0	55.1	45.6	38.8
93 – 184 Days	17.3	19.9	27.1	17.1	13.4	12.1	22.1
185 – 365 Days	26.8	23.5	22.5	26.4	16.1	19.2	24.4
> 365 Days	16.1	12.4	13.2	13.4	15.4	23.1	14.7
<b>Testing</b>							
0 – 90 Days	39.9	37.7	24.0	39.2	18.4	19.4	32.4
91 – 153 Days	15.0	21.0	29.8	15.5	15.9	21.7	21.9
154 – 212 Days	18.1	18.8	15.1	19.0	23.4	29.3	23.4
> 212 Days	26.9	22.5	31.0	26.3	42.3	29.6	22.4
<b>Awareness to Testing</b>							
0 – 153 Days	57.9	65.3	65.9	55.9	70.7	54.3	58.2
154 – 304 Days	14.3	14.3	9.3	19.3	9.1	9.1	15.6
305 – 395 Days	14.2	11.1	10.1	11.9	10.1	14.2	14.1
> 395 Days	13.7	9.3	14.7	13.0	10.1	22.4	12.1



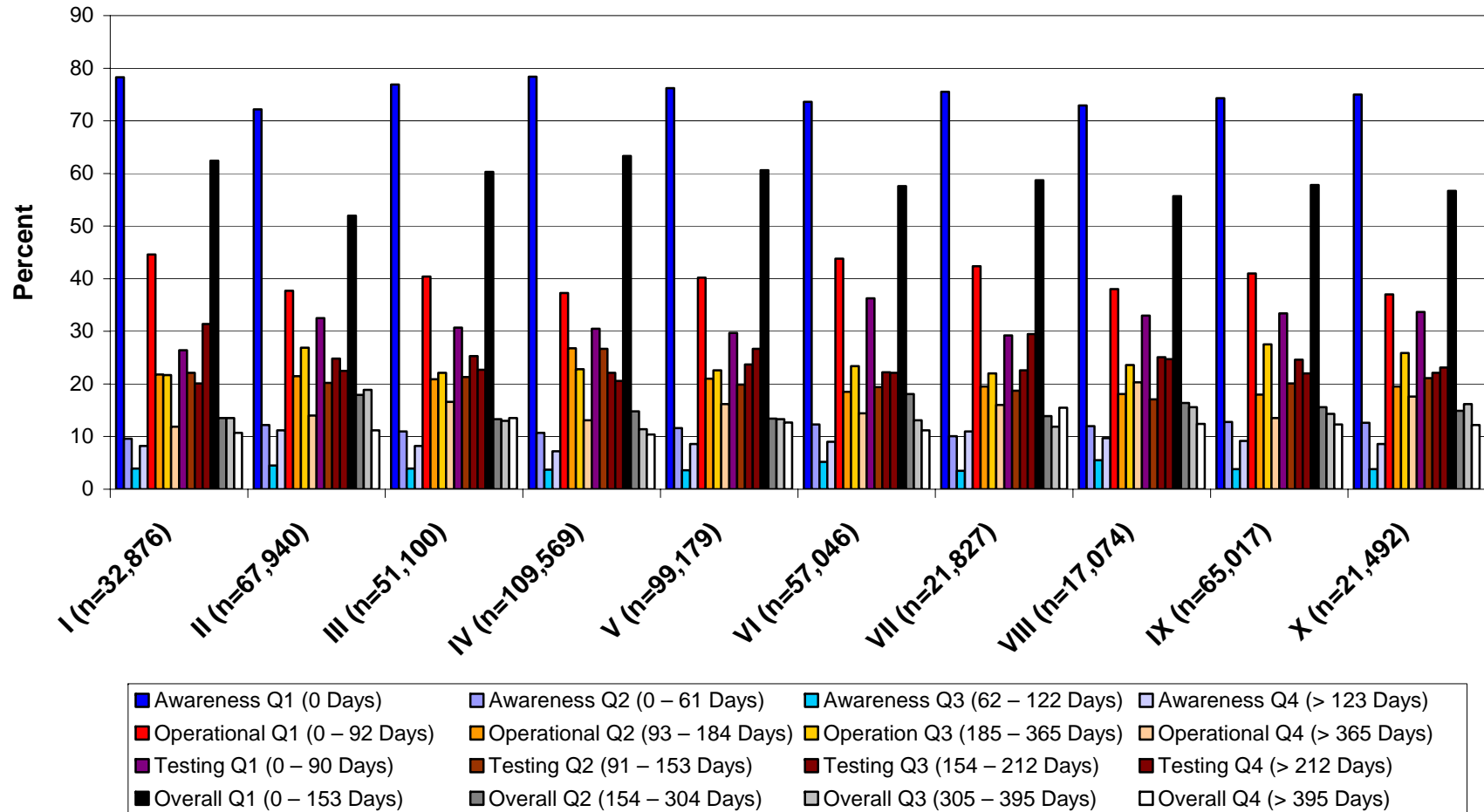
## Phase Quartile Day Range by Entity (percent)



**Phase Quartile Day Range by CMS Region (percent)**

Phase/Quartile	I	II	III	IV	V	VI	VII	VIII	IX	X
<b>Awareness</b>										
0 Days	78.3	72.2	76.9	78.4	76.2	73.6	75.5	72.9	74.3	75.0
0 – 61 Days	9.6	12.2	11.0	10.7	11.6	12.3	10.1	12.0	12.8	12.6
62 – 122 Days	3.9	4.5	3.9	3.7	3.6	5.2	3.5	5.5	3.8	3.8
> 123 Days	8.2	11.2	8.2	7.2	8.6	9.0	11.0	9.7	9.2	8.6
<b>Operational</b>										
0 – 92 Days	44.6	37.7	40.4	37.3	40.2	43.8	42.4	338.0	41.0	37.0
93 – 184 Days	21.8	21.5	20.9	26.8	21.0	18.5	19.5	18.1	18.0	19.5
185 – 365 Days	21.7	26.9	22.1	22.8	22.6	23.4	22.0	23.6	27.5	25.9
> 365 Days	11.9	14.0	16.6	13.1	16.2	14.4	16.0	20.3	13.5	17.6
<b>Testing</b>										
0 – 90 Days	26.4	32.5	30.7	30.5	29.7	36.3	29.2	33.0	33.4	33.7
91 – 153 Days	22.1	20.2	21.3	26.7	19.9	19.4	18.7	17.1	20.1	21.1
154 – 212 Days	20.1	24.8	25.3	22.1	23.7	22.2	22.6	25.1	24.6	22.1
> 212 Days	31.4	22.5	22.7	20.6	26.7	22.1	29.5	24.7	22.0	23.1
<b>Awareness to Testing</b>										
0 – 153 Days	62.4	52.0	60.3	63.3	60.6	57.6	58.7	55.7	57.8	56.7
154 – 304 Days	13.5	17.9	13.3	14.8	13.4	18.1	13.9	16.4	15.6	14.9
305 – 395 Days	13.5	18.9	13.0	11.4	13.3	13.1	11.9	15.6	14.3	16.2
> 395 Days	10.7	11.2	13.5	10.4	12.7	11.2	15.5	12.4	12.3	12.2

## Phase Quartile Day Range by CMS Region (percent)

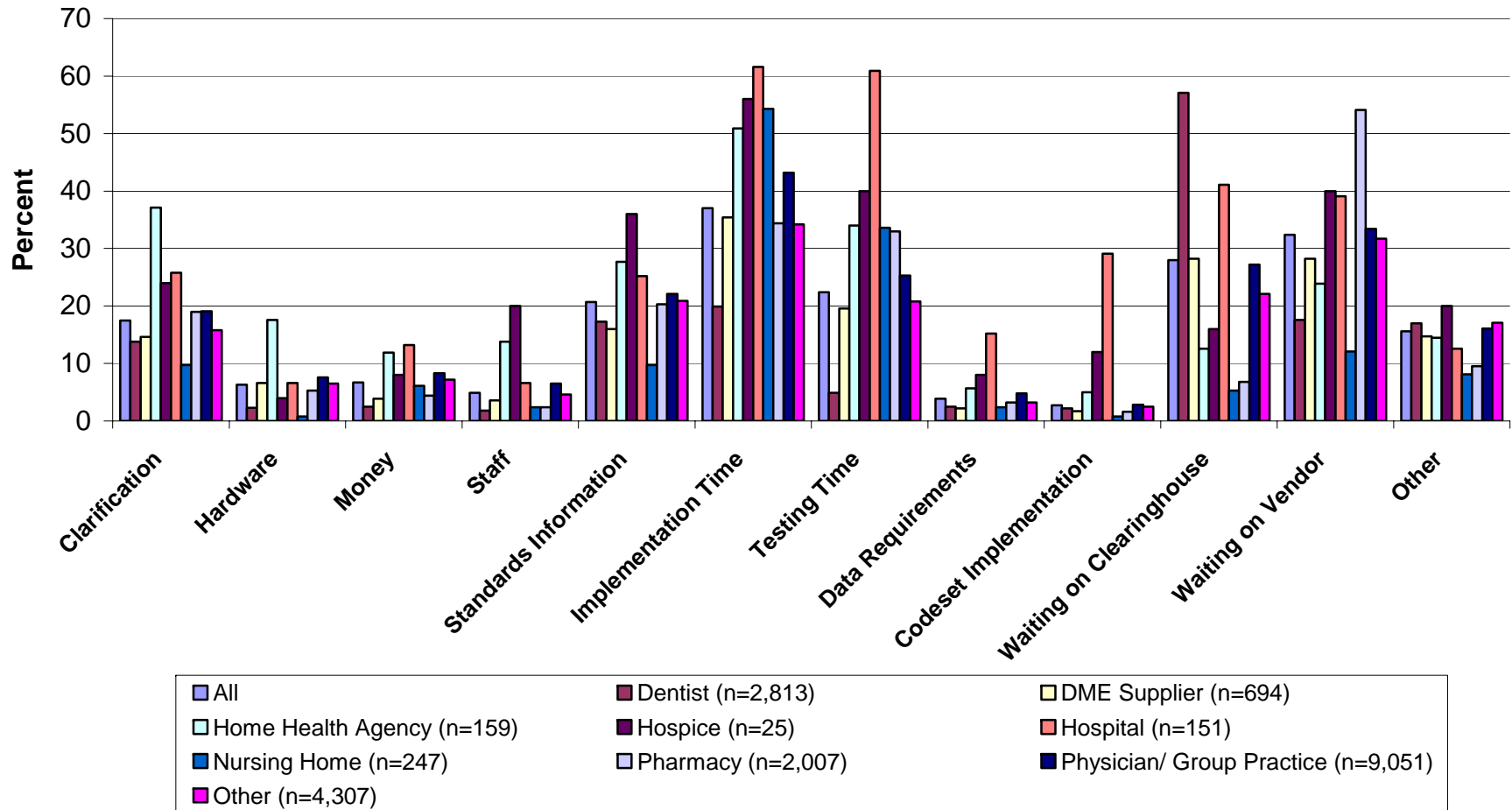


**APPENDIX MATERIAL:  
Respondents Completing Testing**

**Reason for Delay by Provider Type: Testing Completed (Percent)**

	<b>All</b>	<b>Dentist</b>	<b>DME Supplier</b>	<b>Home Health Agency</b>	<b>Hospice</b>	<b>Hospital</b>	<b>Nursing Home</b>	<b>Pharmacy</b>	<b>Physician/ Group Practice</b>	<b>Other</b>
Clarification	17.5	13.8	14.6	37.1	24.0	25.8	9.7	19.0	19.1	15.8
Hardware	6.3	2.3	6.6	17.6	4.0	6.6	0.8	5.3	7.6	6.5
Money	6.7	2.5	3.9	11.9	8.0	13.2	6.1	4.4	8.3	7.2
Staff	4.9	1.8	3.6	13.8	20.0	6.6	2.4	2.4	6.5	4.6
Standards Information	20.7	17.3	16.0	27.7	36.0	25.2	9.7	20.3	22.1	20.9
Implementation Time	37.0	19.9	35.4	50.9	56.0	61.6	54.3	34.4	43.2	34.2
Testing Time	22.4	4.9	19.6	34.0	40.0	60.9	33.6	33.0	25.3	20.8
Data Requirements	3.9	2.5	2.2	5.7	8.0	15.2	2.4	3.2	4.8	3.2
Codeset Implementation	2.7	2.2	1.7	5.0	12.0	29.1	0.8	1.6	2.8	2.5
Waiting on Clearinghouse	28.0	57.1	28.2	12.6	16.0	41.1	5.3	6.8	27.2	22.1
Waiting on Vendor	32.4	17.6	28.2	23.9	40.0	39.1	12.1	54.1	33.4	31.7
Other	15.6	17.0	14.7	14.5	20.0	12.6	8.1	9.5	16.1	17.1

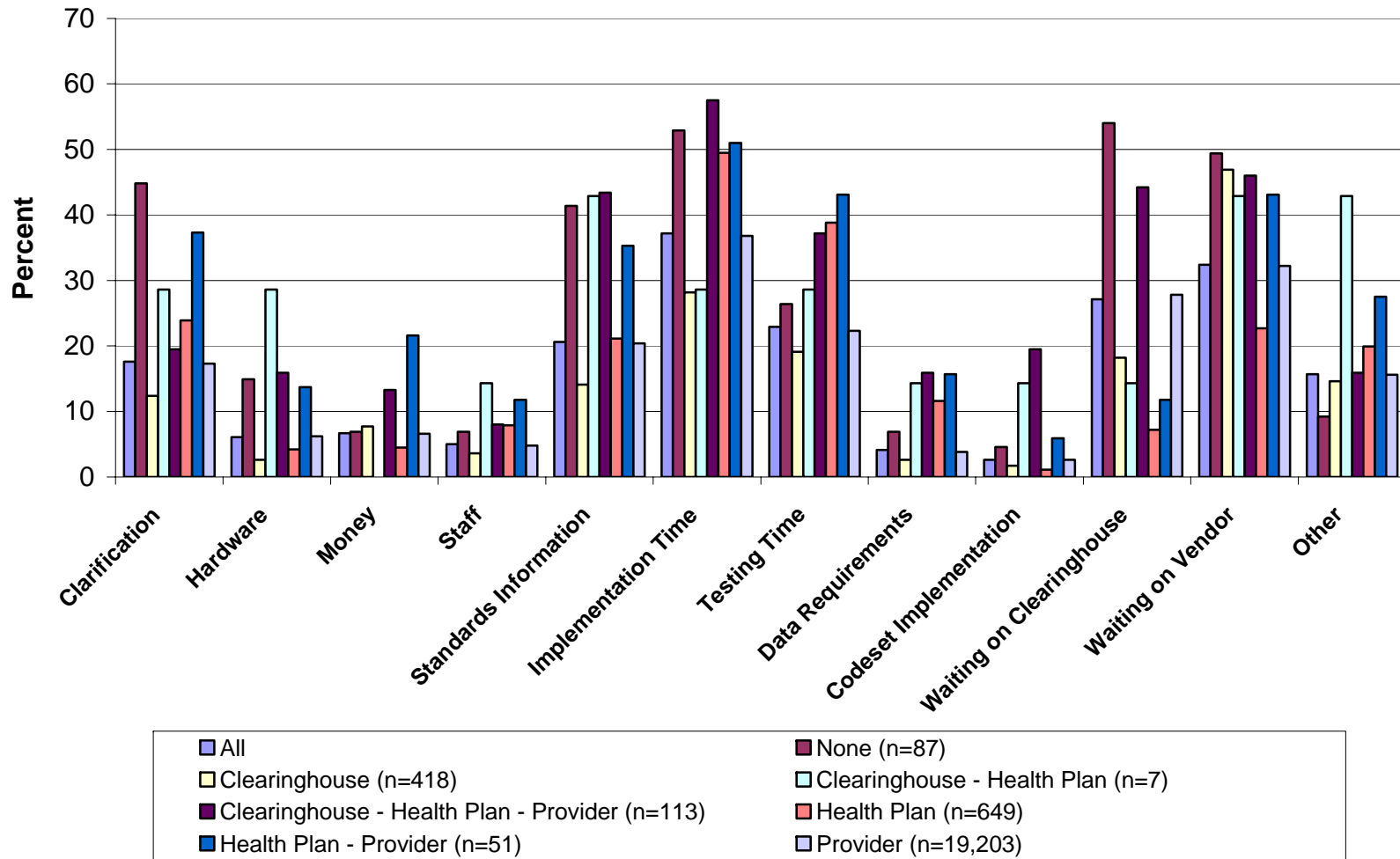
## Reasons for Delay by Provider Type: Testing Completed



**Reasons for Delay by Entity Type: Testing Completed (Percent)**

	<b>All</b>	<b>None</b>	<b>Clearinghouse</b>	<b>Clearinghouse - Health Plan</b>	<b>Clearinghouse - Health Plan - Provider</b>	<b>Health Plan</b>	<b>Health Plan - Provider</b>	<b>Provider</b>
Clarification	17.6	44.8	12.4	28.6	19.5	23.9	37.3	17.3
Hardware	6.1	14.9	2.6	28.6	15.9	4.2	13.7	6.2
Money	6.7	6.9	7.7	0.0	13.3	4.5	21.6	6.6
Staff	5.0	6.9	3.6	14.3	8.0	7.9	11.8	4.8
Standards Information	20.6	41.4	14.1	42.9	43.4	21.1	35.3	20.4
Implementation Time	37.2	52.9	28.2	28.6	57.5	49.5	51.0	36.8
Testing Time	22.9	26.4	19.1	28.6	37.2	38.8	43.1	22.3
Data Requirements	4.1	6.9	2.6	14.3	15.9	11.6	15.7	3.8
Codeset Implementation	2.6	4.6	1.7	14.3	19.5	1.1	5.9	2.6
Waiting on Clearinghouse	27.1	54.0	18.2	14.3	44.2	7.2	11.8	27.8
Waiting on Vendor	32.4	49.4	46.9	42.9	46.0	22.7	43.1	32.2
Other	15.7	9.2	14.6	42.9	15.9	19.9	27.5	15.6

## Reasons for Delay by Entity Type: Testing Completed

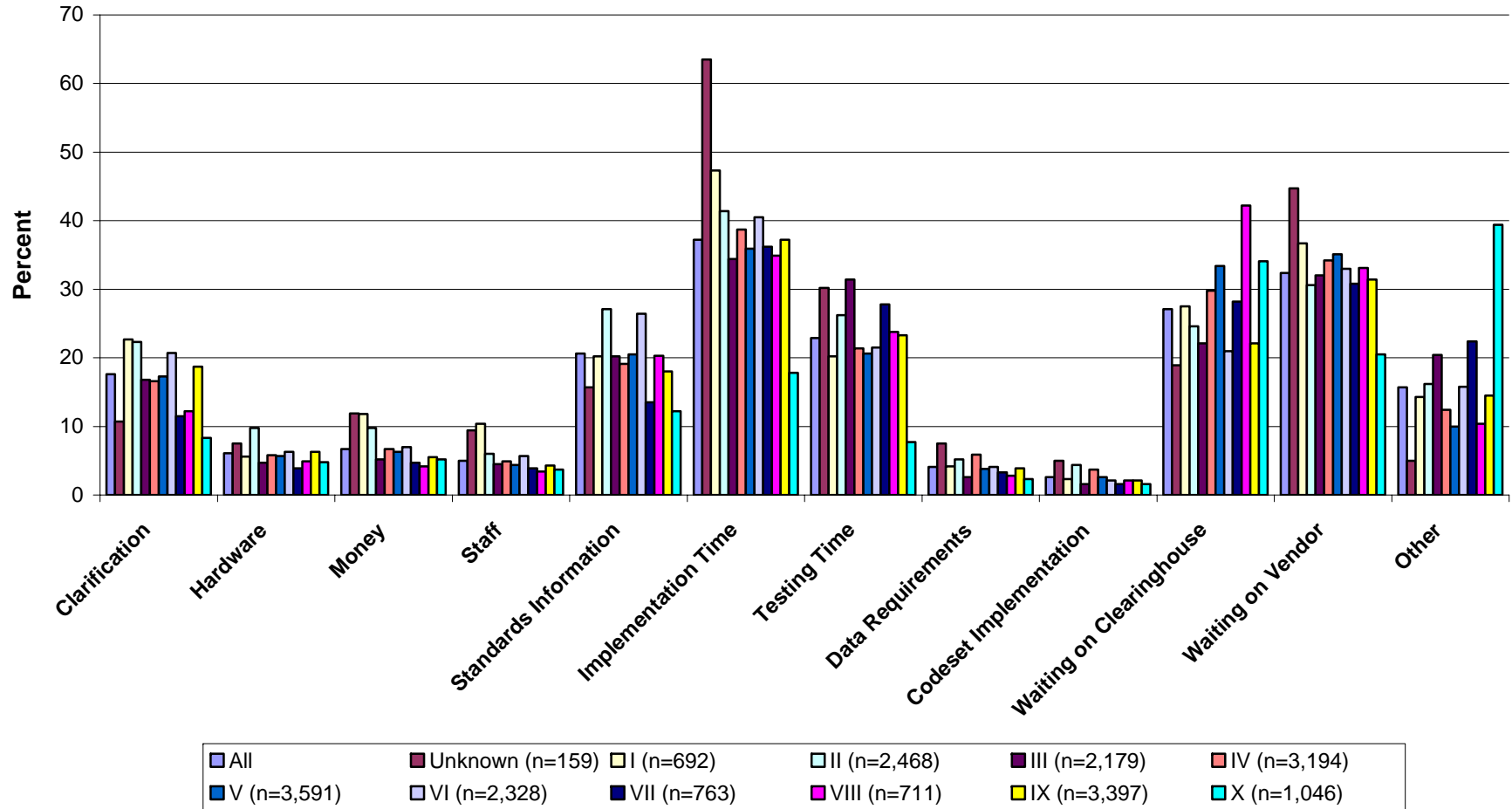




**Reason for Delay by CMS Region: Testing Completed (Percent)**

	<b>All</b>	<b>Unknown</b>	<b>I</b>	<b>II</b>	<b>III</b>	<b>IV</b>	<b>V</b>	<b>VI</b>	<b>VII</b>	<b>VIII</b>	<b>IX</b>	<b>X</b>
Clarification	17.6	10.7	22.7	22.3	16.8	16.6	17.3	20.7	11.5	12.2	18.7	8.3
Hardware	6.1	7.5	5.6	9.8	4.7	5.8	5.7	6.3	3.9	4.9	6.3	4.8
Money	6.7	11.9	11.8	9.8	5.2	6.7	6.3	7.0	4.7	4.2	5.5	5.2
Staff	5.0	9.4	10.4	6.0	4.5	4.9	4.4	5.7	3.9	3.4	4.3	3.7
Standards Information	20.6	15.7	20.2	27.1	20.2	19.1	20.5	26.4	13.5	20.3	18.0	12.2
Implementation Time	37.2	63.5	47.3	41.4	34.4	38.7	35.9	40.5	36.2	34.9	37.2	17.8
Testing Time	22.9	30.2	20.2	26.2	31.4	21.4	20.6	21.5	27.8	23.8	23.3	7.7
Data Requirements	4.1	7.5	4.2	5.2	2.6	5.9	3.8	4.1	3.3	2.8	3.9	2.3
Codeset Implementation	2.6	5.0	2.3	4.4	1.6	3.7	2.6	2.1	1.6	2.1	2.1	1.6
Waiting on Clearinghouse	27.1	18.9	27.5	24.6	22.1	29.8	33.4	21.0	28.2	42.2	22.1	34.1
Waiting on Vendor	32.4	44.7	36.7	30.6	32.0	34.2	35.1	33.0	30.8	33.1	31.4	20.5
Other	15.7	5.0	14.3	16.2	20.4	12.4	10.0	15.8	22.4	10.4	14.5	39.4

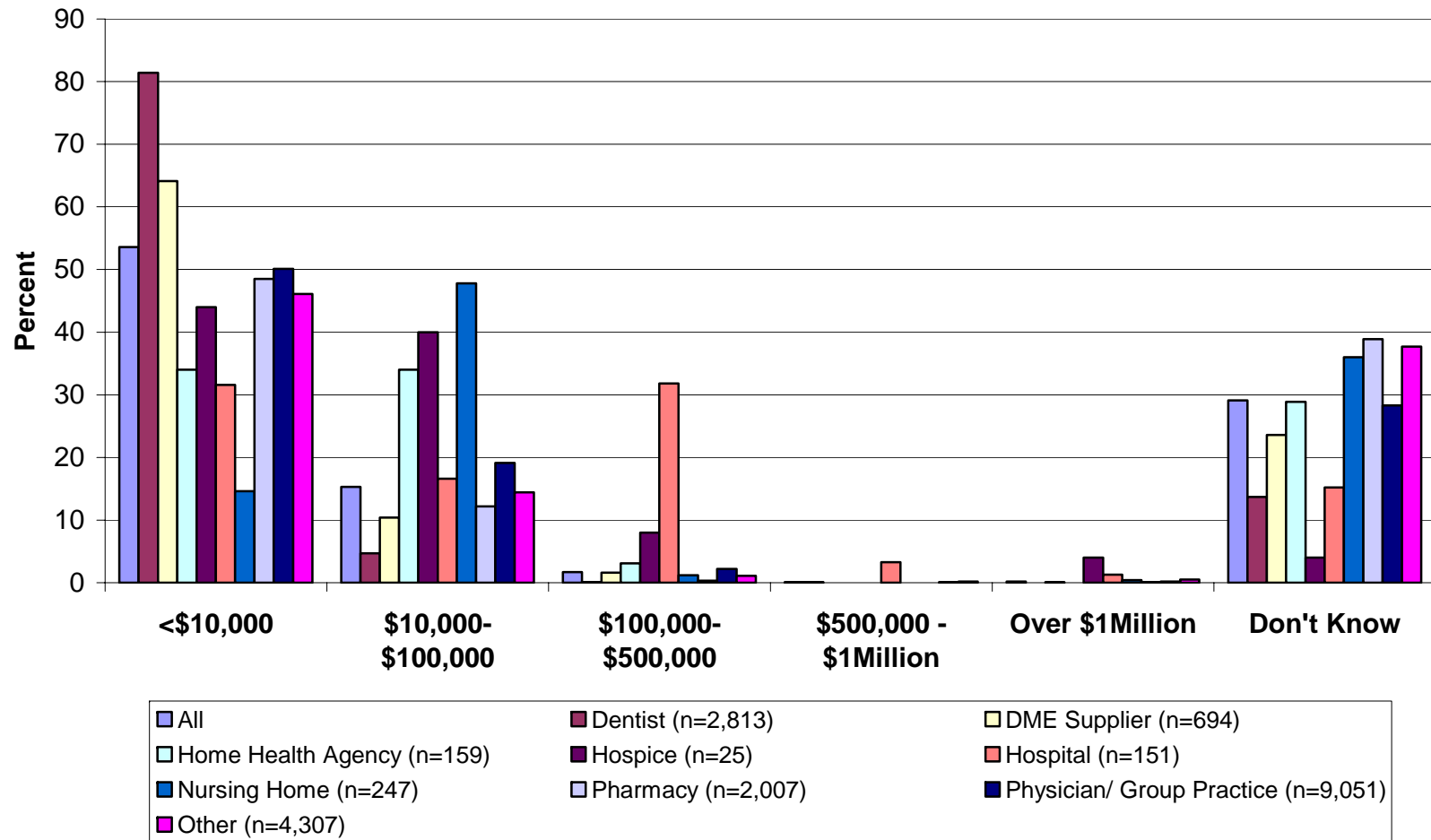
### Reasons for Delay by CMS Region: Testing Complete



**Estimated Cost by Provider Type: Testing Completed (percent)**

	<b>All</b>	<b>Dentist</b>	<b>DME Supplier</b>	<b>Home Health Agency</b>	<b>Hospice</b>	<b>Hospital</b>	<b>Nursing Home</b>	<b>Pharmacy</b>	<b>Physician/ Group Practice</b>	<b>Other</b>
<\$10,000	53.6	81.4	64.1	34.0	44.0	31.6	14.6	48.5	50.1	46.1
\$10,000-\$100,000	15.3	4.7	10.4	34.0	40.0	16.6	47.8	12.2	19.1	14.4
\$100,000-\$500,000	1.7	0.1	1.6	3.1	8.0	31.8	1.2	0.3	2.2	1.1
\$500,000 - \$1Million	0.1	0.1	0.0	0.0	0.0	3.3	0.0	0.0	0.1	0.2
Over \$1Million	0.2	0.0	0.1	0.0	4.0	1.3	0.4	0.1	0.2	0.5
Don't Know	29.1	13.7	23.6	28.9	4.0	15.2	36.0	38.9	28.3	37.7

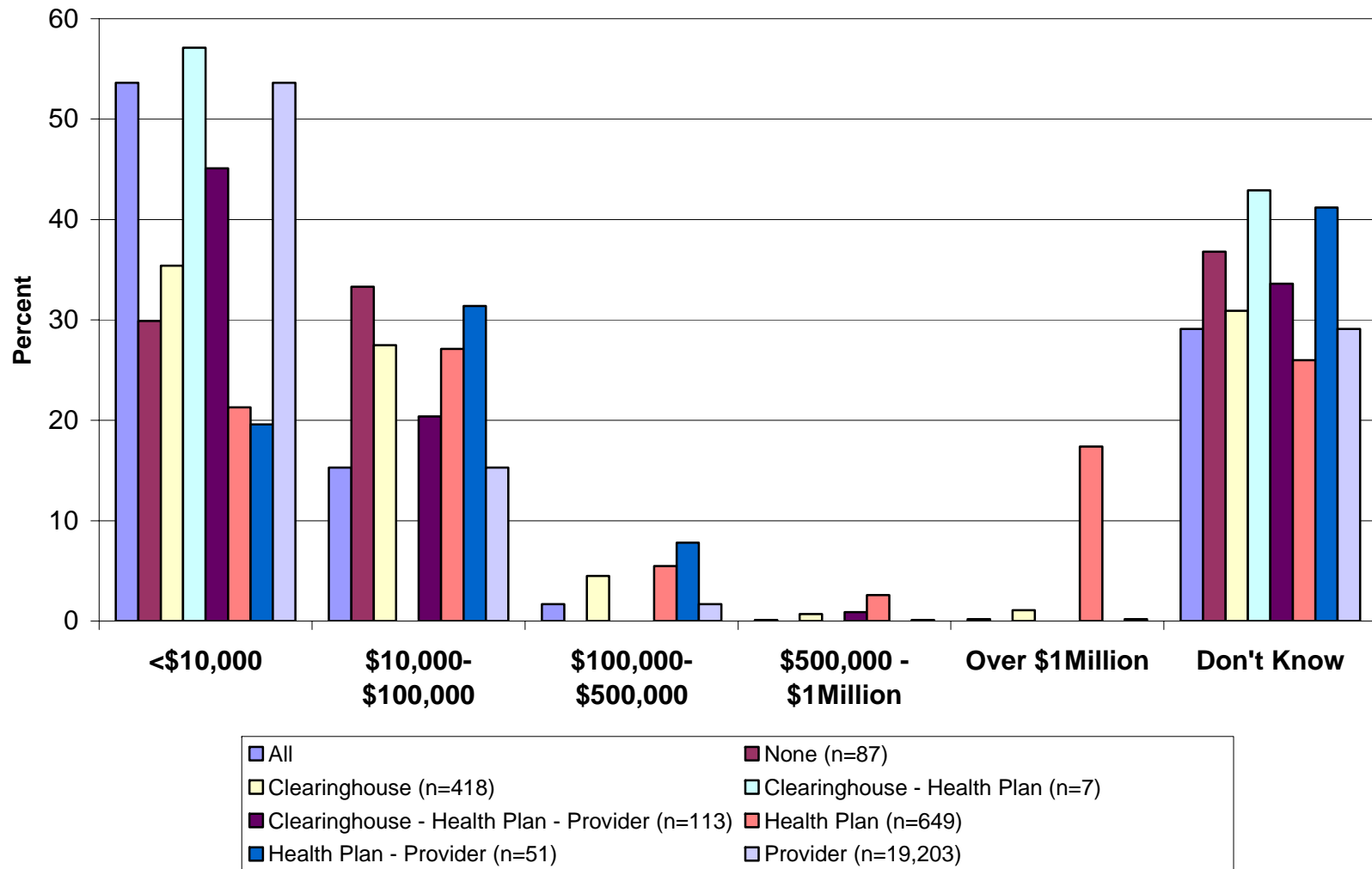
### Estimated Cost by Provider Type: Testing Completed



**Estimated Cost by Entity Type: Testing Completed (Percent)**

	<b>All</b>	<b>None</b>	<b>Clearinghouse</b>	<b>Clearinghouse - Health Plan</b>	<b>Clearinghouse - Health Plan - Provider</b>	<b>Health Plan</b>	<b>Health Plan - Provider</b>	<b>Provider</b>
<\$10,000	53.6	29.9	35.4	57.1	45.1	21.3	19.6	53.6
\$10,000-\$100,000	15.3	33.3	27.5	0.0	20.4	27.1	31.4	15.3
\$100,000- \$500,000	1.7	0.0	4.5	0.0	0.0	5.5	7.8	1.7
\$500,000 - \$1Million	0.1	0.0	0.7	0.0	0.9	2.6	0.0	0.1
Over \$1Million	0.2	0.0	1.1	0.0	0.0	17.4	0.0	0.2
Don't Know	29.1	36.8	30.9	42.9	33.6	26.0	41.2	29.1

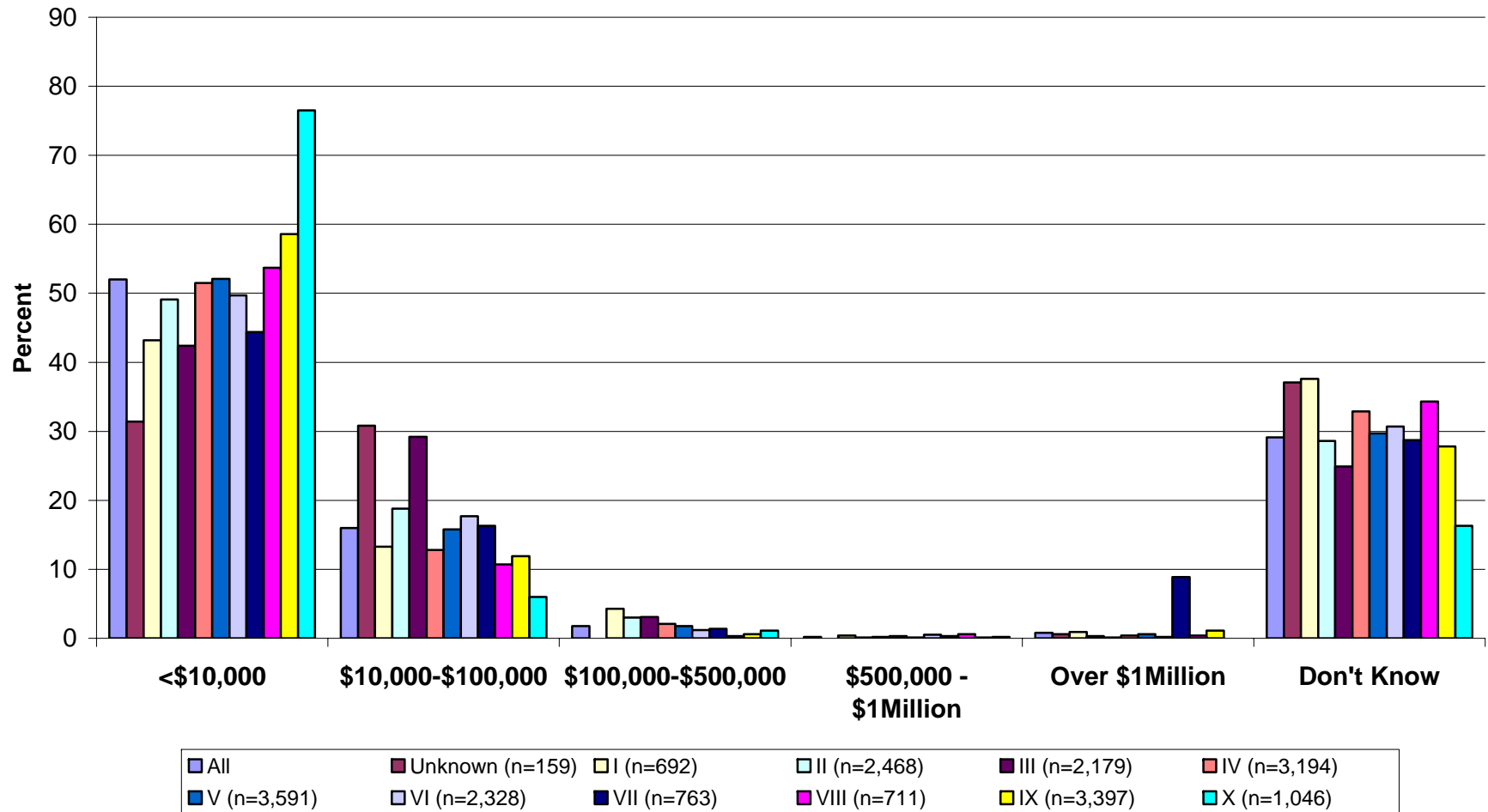
### Estimated Cost by Entity Type: Testing Completed



**Estimated Cost by CMS Region: Testing Completed (Percent)**

	<b>All</b>	<b>Unknown</b>	<b>I</b>	<b>II</b>	<b>III</b>	<b>IV</b>	<b>V</b>	<b>VI</b>	<b>VII</b>	<b>VIII</b>	<b>IX</b>	<b>X</b>
<\$10,000	52.0	31.4	43.2	49.1	42.4	51.5	52.1	49.7	44.4	53.7	58.6	76.5
\$10,000-\$100,000	16.0	30.8	13.3	18.8	29.2	12.8	15.8	17.7	16.3	10.7	11.9	6.0
\$100,000-\$500,000	1.8	0.0	4.3	3.0	3.1	2.1	1.8	1.2	1.4	0.3	0.6	1.1
\$500,000 - \$1Million	0.2	0.0	0.4	0.1	0.2	0.3	0.1	0.5	0.3	0.6	0.1	0.2
Over \$1Million	0.8	0.6	0.9	0.3	0.1	0.4	0.6	0.2	8.9	0.4	1.1	0.0
Don't Know	29.1	37.1	37.6	28.6	24.9	32.9	29.7	30.7	28.7	34.3	27.8	16.3

### Estimated Cost by CMS Region: Testing Completed

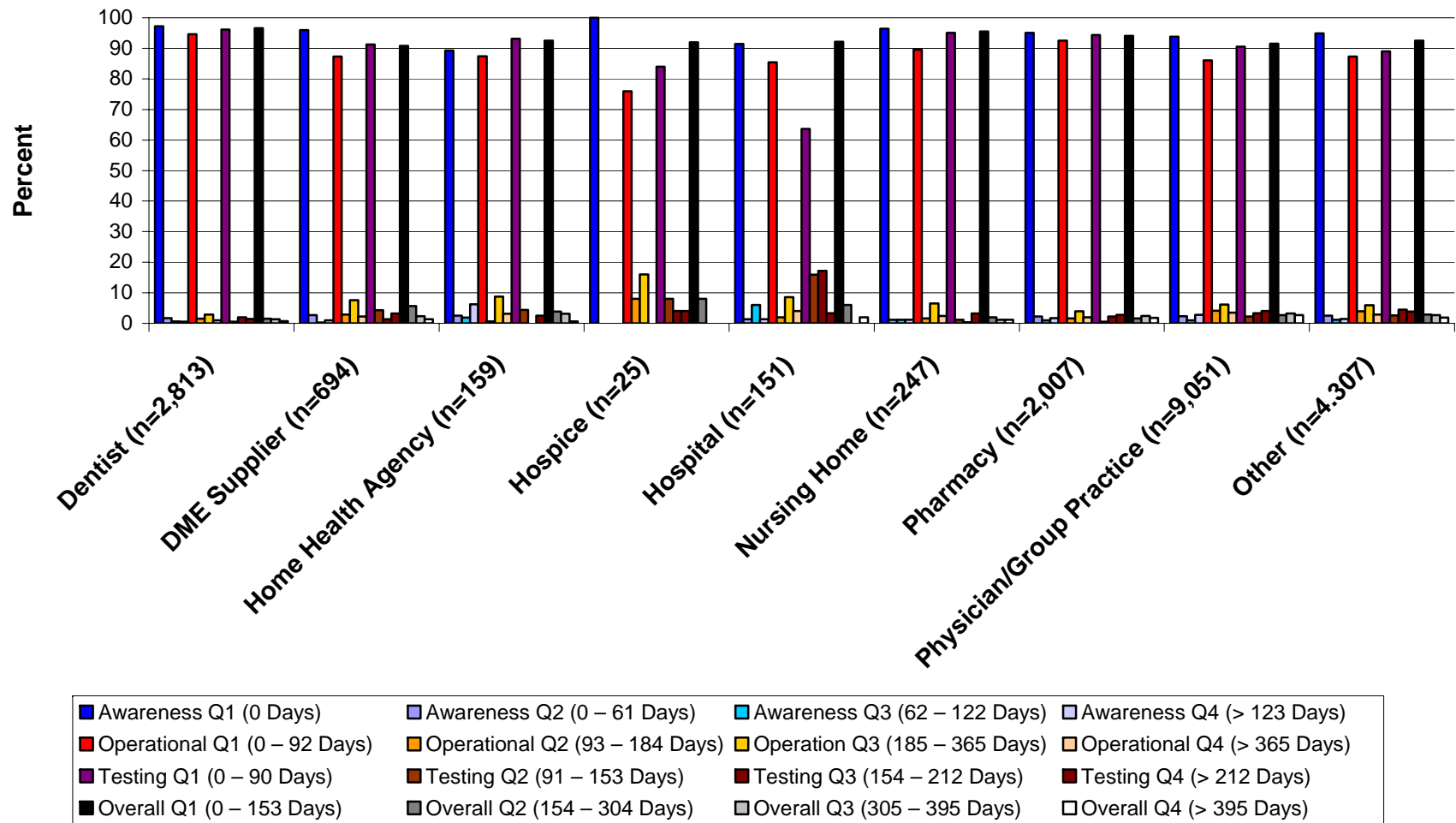




**Phase Quartile Day Range by Provider: Testing Complete (Percent)**

Phase/Quartile	Dentist	DME Supplier	Home Health Agency	Hospice	Hospital	Nursing Home	Pharmacy	Physician/ Group Practice	Other
<b>Awareness</b>									
0 Days	97.2	96.0	89.3	100.0	91.4	96.4	95.1	93.8	94.9
0 – 61 Days	1.7	2.7	2.5	0.0	1.3	1.2	2.2	2.3	2.5
62 – 122 Days	0.6	0.3	1.9	0.0	6.0	1.2	1.0	1.0	1.2
> 123 Days	0.5	1.0	6.3	0.0	1.3	1.2	1.7	2.8	1.4
<b>Operational</b>									
0 – 92 Days	94.6	87.3	87.4	76.0	85.4	89.5	92.5	86.1	87.3
93 – 184 Days	1.5	2.9	0.6	8.0	2.0	1.6	1.6	4.1	3.9
185 – 365 Days	2.9	7.6	8.8	16.0	8.6	6.5	3.9	6.2	5.9
> 365 Days	1.0	2.2	3.1	0.0	4.0	2.4	2.0	3.5	2.9
<b>Testing</b>									
0 – 90 Days	96.2	91.2	93.1	84.0	63.6	95.1	94.4	90.5	89.0
91 – 153 Days	0.5	4.3	4.4	8.0	15.9	1.2	0.5	2.2	2.6
154 – 212 Days	2.0	1.3	0.0	4.0	17.2	0.4	2.2	3.3	4.5
> 212 Days	1.4	3.2	2.5	4.0	3.3	3.2	2.8	4.0	3.8
<b>Awareness to Testing</b>									
0 – 153 Days	96.6	90.8	92.5	92.0	92.1	95.5	94.1	91.5	92.5
154 – 304 Days	1.5	5.6	3.8	8.0	6.0	2.0	1.6	2.7	2.9
305 – 395 Days	1.3	2.3	3.1	0.0	0.0	1.2	2.4	3.2	2.7
> 395 Days	0.7	1.3	0.6	0.0	2.0	1.2	1.8	2.7	1.9

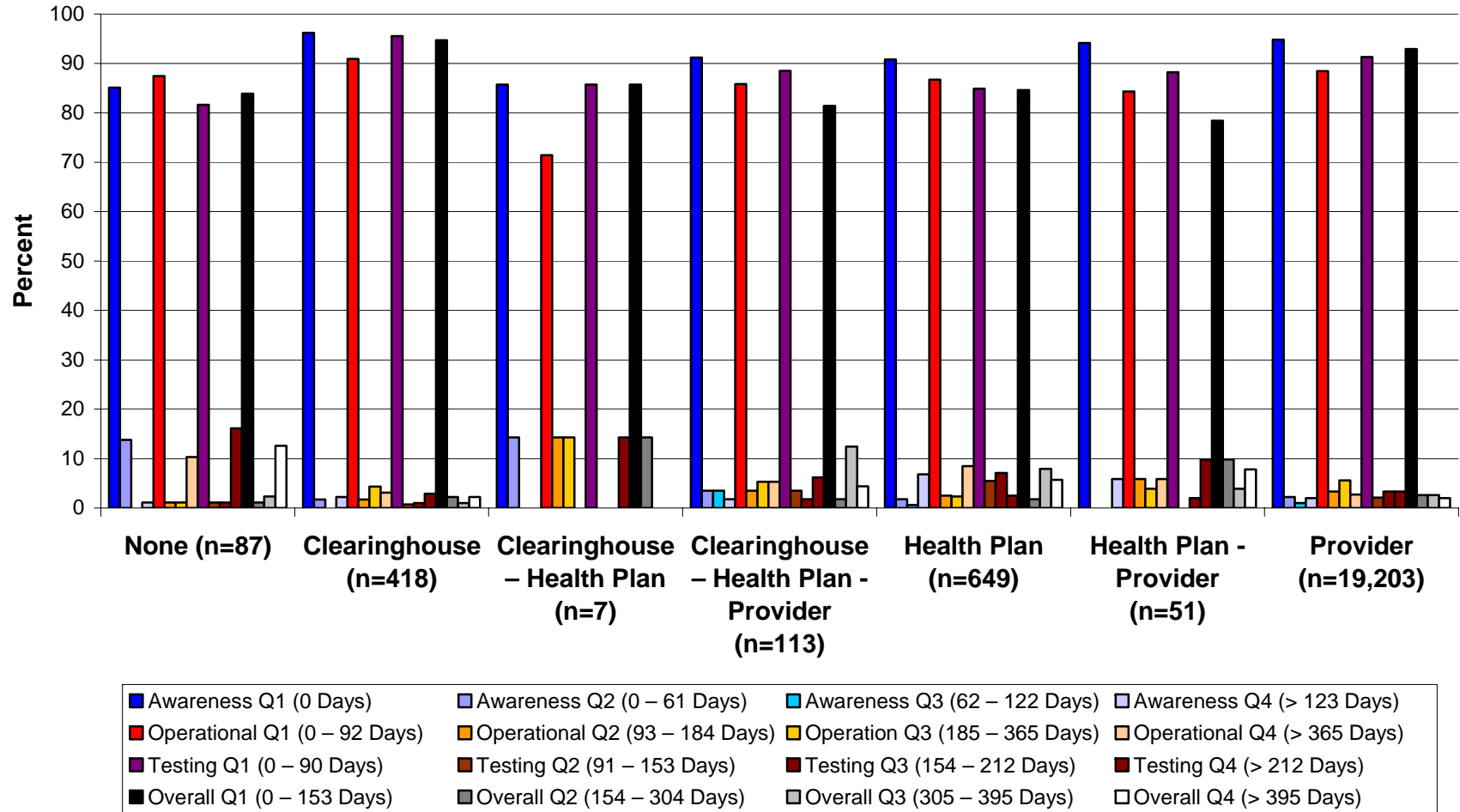
### Phase Quartile Day Range by Provider: Testing Complete (percent)



**Phase Quartile Day Range by Entity: Testing Complete (percent)**

Phase/Quartile	None	Clearinghouse	Clearinghouse – Health Plan	Clearinghouse – Health Plan - Provider	Health Plan	Health Plan - Provider	Provider
<b>Awareness</b>							
0 Days	85.1	96.2	85.7	91.2	90.8	94.1	94.8
0 – 61 Days	13.8	1.7	14.3	3.5	1.8	0.0	2.2
62 – 122 Days	0.0	0.0	0.0	3.5	0.6	0.0	1.0
> 123 Days	1.1	2.2	0.0	1.8	6.8	5.9	2.0
<b>Operational</b>							
0 – 92 Days	87.4	90.9	71.4	85.8	86.7	84.3	88.4
93 – 184 Days	1.1	1.7	14.3	3.5	2.5	5.9	3.3
185 – 365 Days	1.1	4.3	14.3	5.3	2.3	3.9	5.6
> 365 Days	10.3	3.1	0.0	5.3	8.5	5.9	2.7
<b>Testing</b>							
0 – 90 Days	81.6	95.5	85.7	88.5	84.9	88.2	91.3
91 – 153 Days	1.1	0.7	0.0	3.5	5.5	0.0	2.1
154 – 212 Days	1.1	1.0	0.0	1.8	7.1	2.0	3.3
> 212 Days	16.1	2.9	14.3	6.2	2.5	9.8	3.3
<b>Awareness to Testing</b>							
0 – 153 Days	83.9	94.7	85.7	81.4	84.6	78.4	92.9
154 – 304 Days	1.1	2.2	14.3	1.8	1.8	9.8	2.6
305 – 395 Days	2.3	1.0	0.0	12.4	7.9	3.9	2.6
> 395 Days	12.6	2.2	0.0	4.4	5.7	7.8	2.0

## Phase Quartile Day Range by Entity: Testing Complete (percent)



**Phase Quartile Day Range by CMS Region: Testing Complete (percent)**

Phase/Quartile	I	II	III	IV	V	VI	VII	VIII	IX	X
<b>Awareness</b>										
0 Days	95.1	94.2	93.8	94.0	95.4	92.7	96.1	95.9	94.9	97.2
0 – 61 Days	2.0	2.7	1.5	2.4	2.4	2.4	2.1	2.0	2.3	1.6
62 – 122 Days	1.3	0.8	0.9	1.4	0.8	1.5	0.3	1.0	1.0	0.1
> 123 Days	1.6	2.2	3.9	2.2	1.4	3.4	1.6	1.1	1.7	1.1
<b>Operational</b>										
0 – 92 Days	82.4	88	89.0	87.6	87.3	87.5	91.6	92.0	89.0	92.7
93 – 184 Days	9.4	2.8	3.4	3.3	3.6	2.2	1.3	2.5	2.9	3.4
185 – 365 Days	5.8	6.3	4.3	5.5	6.8	6.1	3.5	1.1	5.7	2.4
> 365 Days	2.5	2.9	3.3	3.6	2.3	4.3	3.5	4.4	2.5	1.4
<b>Testing</b>										
0 – 90 Days	84.5	88.7	93.3	91.0	91.0	91.7	91.2	93.1	90.8	96.1
91 – 153 Days	3.0	2.1	1.5	1.8	2.8	1.6	3.3	2.4	2.7	0.6
154 – 212 Days	9.5	4.2	2.4	3.8	2.7	3.8	2.1	2.8	2.7	2.3
> 212 Days	2.9	5.0	2.8	3.4	3.5	2.9	3.4	1.7	3.8	1.1
<b>Awareness to Testing</b>										
0 – 153 Days	93.8	91.7	92.9	91.9	92.4	90.5	94.4	96.1	92.5	96.9
154 – 304 Days	2.5	2.7	1.3	3.0	2.7	3.7	2.6	1.1	2.6	1.0
305 – 395 Days	2.6	3.4	3.9	2.6	2.7	2.7	1.7	1.0	3.0	1.0
> 395 Days	1.2	2.2	1.9	2.5	2.3	3.2	1.3	1.8	1.9	1.1

### Phase Quartile Day Range by CMS Region: Testing Complete (percent)

