



Center for Clinical Standards and Quality/ Quality, Safety & Oversight Group

Admin Info: 24-18-CLIA

DATE: July 26, 2024
TO: State Survey Agency Directors
FROM: Director, Quality, Safety & Oversight Group (QSOG)
SUBJECT: **REVISED:** Fiscal Year (FY) 2025 Clinical Laboratory Improvement Amendments (CLIA) Budget Call Letter

Memo Revision Information:

Revisions to: 24-15-CLIA

Original release date: July 2, 2024

Memorandum Summary

- **FY 2025 CLIA Budget Call Letter:** Enclosed is a copy of the FY 2025 CLIA Budget Call Letter.
- State staffing targets are determined based on the workload required to survey each State's laboratory population. **State budgets should reflect the cost to perform the workload shown in this budget call.**
- State budget submittals are due to the Centers for Medicare & Medicaid Services (CMS) by **August 16, 2024.**

Background

This memo is revised to reflect a 3.5% increase over the FY24 CLIA awards in Attachment C, Table 6. The due date for State budget submissions is changed to August 16, 2024, to allow State Agencies additional time to incorporate this change.

CMS is providing information and guidelines for determining FY 2025 (October 1, 2024 – September 30, 2025) State Survey Agency (SA) CLIA budgets and projected workloads. States should prepare FY 2025 budgets to reflect the workload and funding levels provided in this package. Budget submissions should demonstrate how the funding allocated to each SA will be used to accomplish the CLIA program workload.

The tables in this letter reflect the proposed allocation of funding to individual SAs based on workload projections. For FY 2025, we estimate a workload of approximately 8,326 compliance initial and

recertification surveys, 2,547 follow-up/revisit compliance surveys, 420 validations of accredited laboratory surveys, 150 follow-up/revisit validation surveys, 299 complaint surveys, and 783 PT Desk Review surveys. The requirement for validation surveys remains at the level of five percent per survey cycle.

Each State should continue to work toward meeting the workload targets, as well as the average national productivity standard of 120 surveys per surveyor full-time equivalents (FTEs) per year (112 initial/recertification and eight follow-up surveys). The average number of survey hours should not exceed 14 per survey.

Budget Submission

The SA budget submission includes a Form CMS-102, Form CMS-105, Form CMS-1465A, and an Annual Activity Plan. If funds are budgeted for equipment purchases, a Form CMS-1466 must also be submitted. All budget forms must be submitted through the Survey and Certification / Clinical Laboratory Improvement Amendments (SC/CLIA) System. Annual Activity Plans should be submitted to DCLIQSABudget@cms.hhs.gov.

- The Form CMS-102 is a breakout of your SA FY25 CLIA program costs by cost category (salaries, fringe benefits, training, indirect costs, etc.).
- The Form CMS-105 is an estimate of the number of laboratory surveys for each laboratory type the SA expects to complete in FY25.
- The Form CMS-1465A is used for all CLIA funded position approvals. All full time and partial FTE employees must be listed on this form. If the SA is requesting funding for a position that is unfilled, enter “VACANT” under the First Name and Last Name columns. The Total “Funds Required” on the Form CMS-1465A must match the “Total Salaries” on line 3 of the Form CMS-102.
- The Form CMS-1466 is used to provide detail for equipment purchases included on line 10 of the Form CMS-102 budget request. The total “Net Cost” from the Form CMS-1466 should match the “Equipment Purchases” on line 10 of the Form CMS-102. For purposes of CLIA budget submissions, CMS defines equipment as tangible personal property having a useful life of more than one year and a per unit cost equal to \$500 or greater. All equipment purchases must be pre-approved in the annual budget.
- The Annual Activity Plan is a detailed narrative that includes information and supporting documentation essential to support the annual budget. Please refer to Attachment A for a list of information to include in the Annual Activity Plan.

Key Points for FY 2025

- If the SA requests an increase over the funding allocated in this letter, a detailed description of the types of costs and activities to be funded by the increase must be included in the Annual Activity Plan. Adequate description of the additional costs and justification of the increase is necessary for

CMS to process increased funding requests. Please refer to #15 under Appendix A for description of the information required for budget increase requests.

- The CLIA program will fund partial FTEs where the projected workload does not support a full FTE. This approach is necessary to maintain the economy and efficiency of the CLIA program. In recognizing that support work (clerical, accounting, supervisory) is essential to the CLIA program, in FY25, projected workloads for support hours have been increased and condensed to two categories:
 - Administrative/Support hours are estimated at 3 hours to every 4 survey hours
 - Supervisory hours are estimated at 1 hour to every 7 survey hours
- Hourly rates reflected in the attachments are calculated by dividing the FY24 negotiated state award (after removing one-time expenditures) plus a 3.5% inflation adjustment by the FY25 projected workload hours.
- SA employee salaries have a significant impact on funding. It is important for SAs to notify CMS as soon as possible when salary changes occur. Salary changes should also be detailed in the Annual Activity Plan.
- Cost estimates for the mandatory FY25 CLIA Surveyor Training should be included in the SA budget submission on the “Training” line 7 of the Form CMS-102. The training is planned for January and will last two days. Training is for surveyors only in FY25.
- The cost of equipment purchased for the benefit of multiple programs must be allocated between the benefiting programs. For example, the cost of a laptop used to complete both CLIA and Survey and Certification program activities must be split between the programs. The method used to allocate the costs should be described in the Annual Activity Plan.
- Laboratory programs in Washington State and New York State (non-physician office laboratories) are exempt from CLIA. Workloads for exempt labs in these States are excluded from the funding allocations in this memo.

Budget Process

Each SA is required to submit the budget forms and the Annual Activity Report no later than August 16, 2024. CMS will review submissions and contact SAs if further information is required. The SA should be prepared to respond to follow-up questions and requests for additional documentation.

CMS will notify each SA when the final budget amounts are determined. The certified forms in the SC/CLIA system must reflect the final, approved budget. If the approved budget differs from the amounts certified on the forms in the SC/CLIA system, CMS will uncertify the forms and notify the SA that adjustments are required.

Attachment B (**Guidelines and Program Emphases to be followed by States in Preparing FY 2025 CLIA Budgets**) provides detailed information on budget preparation for the States.

Additional References:

The State Operations Manual (SOM) contains information relevant to the budgetary process. The Code of Federal Regulations (CFR) Title 45, Part 75 “Uniform Administrative Requirements, Cost Principals, and Audit Requirements for HHS Awards” provides direction in determining the allowable costs of programs administered by State Governments under grants from and contracts with the Department of Health and Human Services.

Contact: If you have any questions or need further clarification pertaining to information provided in the budget call letter, please email DCLIQSABudget@cms.hhs.gov.

Effective Date: Immediately. Please communicate to all appropriate staff within 30 days.

/s/

David R. Wright

Director, Quality, Safety & Oversight Group

Attachment(s):

- A) The Annual Activity Plan
- B) Guidelines and Program Emphases to be followed by States in Preparing FY 2025 CLIA Budgets
- C) CLIA FY25 Budget Call Letter Tables

Resources to Improve Quality of Care:

Check out CMS’s new [Quality in Focus](#) interactive video series. The series of 10–15 minute videos are tailored to provider types and aim to reduce the deficiencies most commonly cited during the CMS survey process, like infection control and accident prevention. Reducing these common deficiencies increases the quality of care for people with Medicare and Medicaid.

Learn to:

- *Understand surveyor evaluation criteria*
- *Recognize deficiencies*
- *Incorporate solutions into your facility’s standards of care*

See the [Quality, Safety, & Education Portal Training Catalog](#), and select [Quality in Focus](#)

Get guidance memos issued by the Quality, Safety and Oversight Group by going to [CMS.gov page](#) and entering your email to sign up. Check the box next to “CCSQ Policy, Administrative, and Safety Special Alert Memorandums” to be notified when we release a memo.

The Annual Activity Plan

The Annual Activity Plan is a written narrative submitted to CMS with the annual budget request. The narrative includes information and supporting documentation essential to support the annual budget. The information listed below should be addressed in the Annual Activity Plan.

1. Describe the SA CLIA program which permits survey and certification work to be done orderly throughout the year and with an even workload distribution over the 1- and 2-year cycle.
2. A plan for using professional staff in survey and certification activities when more than one surveyor is required (division of responsibilities for survey, deployment of teams in relation to specific workload areas, and geographic deployment).
3. List the names and health professions or specialties of currently qualified surveyors.
4. Provide a description of the State's use of any laboratory testing or evaluation program concerning CLIA activities.
5. Describe the methodology used to allocate partial FTEs to the CLIA program. For example, if the SA has employees that are partially funded by CLIA, explain in the Annual Activity Plan how the SA will determine the amount of time spent on CLIA activities and allocate the appropriate amount of the employee's salary to the quarterly Form CMS-102 expenditure reports.
6. Explain how the retirement and fringe benefits are calculated and allocated to the employees on line 4 and line 5 of the Form CMS-102. If a set percentage is used to allocate the fringe and retirement benefits, the SA provides an explanation of how this percentage is derived.
7. Describe how the Travel portion of the budget on line 6 of the Form CMS-102 was calculated. Indicate in the Annual Activity Plan an estimate of the expected number, type, and extent of trips. For out-of-state travel, indicate the number of trips, purpose, and basis for charges to the CLIA program. Include the basis for charges for all out-of-state travel other than to meetings arranged by CMS.
8. Explain costs included on the Communications line 7 of the Form CMS-102.
9. Describe the supplies included on the Supplies line 8 of the Form CMS-102
10. Provide a description and justification for all equipment budgeted on line 10 of Form CMS-102 and included on Form CMS-1465A. Provide the purchase date for all equipment that is being replaced by a newly budgeted equipment purchase. For example, if a new printer is included in the budget on line 10, the SA must include the original date of purchase of the printer that is being replaced.
11. Provide an outline of program training planned and budgeted on line 11 of Form CMS-102 (staff training meetings, formal courses attended, seminars, in-service training program).
12. Provide justification and details of the contracts for amounts budgeted on lines 12 and 13 of the Form CMS-102 for Consultants and Contractors.
13. Describe all miscellaneous expenditures budgeted on line 14.

- 14.** Explanation of how indirect costs are allocated to the CLIA program on lines 17 and 18 of the Form CMS-102. If an indirect cost rate is used, confirm in the Annual Activity Plan that the SA has an approved Indirect Cost Rate Agreement with HHS. Describe the indirect cost base. If an indirect cost rate is not used, provide a description of the indirect cost allocation methodology.
- 15.** If the SA is requesting an increase over the funding allocated in the Budget Call Letter, a detailed description of the types of costs and activities to be funded by the increase is required. Provide a breakout of the costs included in the increase. Justification and description of why the increase in funding is required and should be included. Provide any data or supporting documentation that supports the increase in funding. Without an adequate description of the additional costs and justification of the increase, CMS will not be able to approve the increased funding request. The SA should be prepared to respond timely to follow-up questions and requests for additional documentation regarding budget increases.

Guidelines and Program Emphases for FY25 CLIA Budgets

I. Overview

The State Agency (SA) budget submissions should cover the period October 1, 2024 through September 30, 2025. The State Operations Manual (SOM), Part VI-Special Procedures for Laboratories, is the technical guide to be used in the preparation of the budget submission.

II. Program Emphases

In FY 2025 workloads will continue to fluctuate. State Agencies should not budget for any major changes to basic administrative functions. The Centers for Medicare & Medicaid Services (CMS) Division of Clinical Laboratory Improvement and Quality (DCLIQ), and SAs should continue to monitor activities to maintain awareness of current practices. CMS will provide ongoing information, guidance and training on policies and procedures.

State Agency Performance Review (SAPR)

The CLIA State Agency Performance Review (SAPR) continues as an ongoing activity aimed at promoting optimal SA performance by recognizing sustained proficiency and facilitating improvement. State Agencies are expected to have mechanisms in place to ensure fulfillment of their CLIA program responsibilities. For FY 2025, SAs should continue to evaluate the effectiveness of corrective actions taken in response to their SAPR reviews. DCLIQ may make modifications to the structure or content of the SAPR based on operational experience. DCLIQ will utilize the aggregate findings of the reviews to update and clarify policy and determine national training needs.

Proficiency Testing (PT)

State Agencies are provided with funding for PT monitoring and maintaining corresponding policies and procedures. State Agencies should continue PT reviews and follow-ups/revisits in accordance with SOM Chapter 6 § 6042-6100 and § 6278. We estimated the FY 2025 PT Desk Review workload by taking an average of hours and counts from FY 2022 through FY 2023.

Laboratory Inquiries and Data Systems Processing

During FY 2025 SAs should anticipate a continued high level of inquiries from CLIA laboratories and continue to adjust to the Quality Improvement and Evaluation System (QIES).

QIES/ASPEN for CLIA

State Agencies complete their CLIA data entry workload and report retrievals in the QIES/ASPEN data environment.

Certificate Status Changes

The data system processes nearly all status changes as they are entered into the data system. The process may require obtaining additional information from the laboratories such as verifying laboratory director

qualifications. In addition, the process may generate new fees and/or certificates to the laboratories and could result in follow-up phone calls. This is an ongoing activity.

Accredited Laboratories

The data system continuously receives and updates a significant amount of data from the accrediting organizations. The data collected covers all areas of a laboratory's operations (including dates of inspection) and is used to generate fees and certificates and to measure timeliness of inspections. This process may cause a change in information previously provided and laboratories may inquire with the SA to validate the accuracy of fees and certificate information. In addition, on a weekly basis, an automated letter is sent to any accredited laboratory by the CMS data system that does not have current accreditation affiliation information. In the letter we ask the laboratory to notify the SA to make any necessary corrections to its CLIA information. This is an ongoing activity.

Validation Surveys

The SA conducts validation surveys in accordance with SOM Chapter 6 § 6150 – 6228.

Biennial Inspections

Laboratories will continue to be subject to surveys every two years. State Agencies should be performing surveys in accordance with SOM Chapter 6 § 6101-6140 at the average national productivity standard of 120 surveys per surveyor full-time equivalents (FTEs) per year (112 initial/recertification and eight follow-up surveys). Initial surveys of new compliance laboratories should be performed in accordance with SOM Chapter 6 § 6102.

Selection for survey of compliance laboratories should continue to be made only after verification of payment of compliance fees. “CASPER REPORT 80” is available to assist SAs with validating these payments and enables any SA to identify those compliance laboratories, application type 1, that have paid their compliance fees, whether initial or recertification.

Announced Surveys

Budget projections continue to be based on the premise of announcing certification surveys up to two weeks prior to the survey date at all CLIA laboratories (complaint and follow-up/revisit surveys will not be announced). Validation surveys may be announced except for simultaneous validation surveys of laboratories accredited by American Association of Blood Banks (AABB), College of American Pathologists (CAP), the Joint Commission (TJC) and in limited instances (COLA) (see Admin Info: 07-23) which must be unannounced.

Surveyor Productivity

Ten surveys per surveyor FTE per month (13.3 average hours per survey) will remain the **minimum** standard for FY 2025. Surveyors should expect to meet the target of 120 surveys (112 initial/recertification and 8 follow-up surveys) per surveyor FTE per year. **Any SA performing below the FY 2025 target should identify in its budget submission what steps will be taken to increase surveyor productivity.** We recommend that you contact other SAs that have lower 670 hours and higher productivity to identify potential best practices that can be used to increase productivity. The SA must keep accurate 670 hour records to ensure CLIA fees are calculated correctly.

Training

Training budgets should reflect SA attendance at the following **mandatory** courses:

- FY 2025, National Surveyor Training
- Basic Surveyor State Agency Training (on-line, Winter 2024) - Surveyors will need to complete all mandatory online QSEP CLIA training and as applicable, complete the Surveyor Skills Refresher and Foundational Refresher, prior to the National Surveyor Training.

The costs associated with these trainings should be included in each SA budget submission. **Once approved, funds for these mandatory course selections may not be reprogrammed by the SA for other training courses without prior approval from CMS; in no case may training funds be reprogrammed to non-training, non-CLIA categories.**

State Agencies should be properly classifying training costs when filling out their quarterly expenditure reports in the automated system. Accommodations, per diems and travel costs should be included in the training cost category.

Accredited/CLIA Exempt Laboratories

In preparing your budget please note that the following accrediting organizations are currently recognized as meeting CLIA requirements for approved accrediting organizations: The Accreditation Commission for Health Care (ACHC), Association for the Advancement of Blood & Biotherapies (AABB), COLA, College of American Pathologists (CAP), The Joint Commission (TJC), The American Society for Histocompatibility and Immunogenetics (ASHI) and American Association for Laboratory Accreditation (A2LA) Together these organizations oversee the entire CLIA accredited laboratory population. Only Washington State and New York State (non-physician office laboratories) have been granted CLIA exempt status at this time.

Approximately **five** percent of the laboratories accredited by the approved laboratory accreditation organizations are surveyed as part of the validation survey process conducted during each two-year cycle. State Agencies are expected to survey accredited facilities no more than 90 days after the accrediting organization inspection and must ensure that laboratories within each schedule type are included to the extent possible. Actual workloads may vary from the level projected as we continue to reconcile the CLIA database to accrediting organizations. State Agencies should follow the validation survey process for selection and survey of these labs.

Enforcement Process

We continue to focus on promoting an educational approach to facilitate survey deficiency corrections. State Agencies are required to enter enforcement data into the ACTS system timely.

Waived Laboratories

For the FY 2025 Budget Cycle the Waived Laboratory Survey Initiative has been discontinued.

Provider Performed Microscopy (PPM)

Laboratories holding a preferred provider microscopy (PPM) certificate will not be subject to routine

inspection. Laboratories meeting the requirements for the PPM Certificate will be subject to a survey where complaints are filed or if there is reason to believe the laboratory is conducting tests beyond its certificate. PPM tests conducted in laboratories with a compliance certificate may have PPM tests included in the survey sample.

Survey Priorities

Unless otherwise specified in this instruction SAs should follow the SOM, Chapter 6-Special Procedures for Laboratories, in developing survey schedule priorities. Recertification surveys should be prioritized by the date of the last recertification survey. Laboratories with the largest time gap since the last recertification survey should be surveyed first.

Administrative/Support Staffing

For FY 2025, CMS is increasing the overall administrative/support hours to 3 hours for every 4 survey hours. All budget submissions must clearly document the number of supervisory, surveyor, non-surveyor professional and clerical staff, as well as the FTE equivalents for these categories.

Computer Equipment

For FY 2025, we will continue to closely monitor computer equipment purchases. State Agencies with more than two computers in use, equipment purchases should be spread over multiple years to minimize the budgetary impact on any single fiscal year.

A SA sharing equipment charged to the CLIA program with another State program must ensure that appropriate cost allocation methodologies are applied to ensure proper expensing of equipment.

CMS will closely evaluate each request for equipment and propose approval for those items that are necessary for maintaining adequate access to CLIA data systems needed to process reports and browse CLIA payments. State Agency requests for computer equipment and related software will be given first priority. All other non-computer equipment requests should be adequately justified.

Planned purchases of computer and peripheral items with processing capabilities substantially in excess of the CLIA data systems requirements should not be approved.

Encryption Policy:

CMS' encryption policy requires all agency data be protected from unauthorized access. There may be various levels of protection for agency data, but for personally identifiable information (PII), the policy states that dissemination of such data using any portable devices or recordable media, (e.g., CDs, DVDs, Cartridges, Diskettes, Laptops, External Hard Drives, USB Memory Sticks or thumb drives, etc.), requires encryption. Whole disk encryption of the hard-drive for Laptops or Tablet PCs must be employed. Encryption is the process of protecting stored or transmitted information with a password (key) so that it is indecipherable until the intended recipient uses the password to access it.

In accordance with the CMS encryption policy, all workstations with installed CMS data system components must have encryption software installed that meets or exceeds the standards set forth in the "CMS Information Security Acceptable Risk Safeguards (ARS)". This includes all CMS data systems components installed on Laptop/Tablet PCs as well as any removable media and/or cloud computing used to disseminate PII/PHI. Specifically, the following sections of the ARS should be

referenced:

- IA-7 Cryptographic Module Authentication (Specifies acceptable encryption type – FIPS 140-2 compliant (<https://nvd.nist.gov/800-53/Rev4/control/IA-7>) NIST validated module. (<https://csrc.nist.gov/projects/cryptographic-module-validation-program>)
- IA-2 User Identification and Authentication
- AC-3 Access Enforcement
- AC-4 Information Flow; specifically CMS-2
- AC-19 Access Control for Portable and Mobile Systems (encryption requirement only)
- MP-5 Media Transport
- SC-8 Transmission Integrity
- SC-12 Cryptological Key Establishment and Management

Please note, in addition to these encryption sections, agencies are encouraged to review the entire ARS as a guideline for enterprise-wide security practices. States are responsible for ensuring that encryption software has the capability of creating encrypted files that are self-extracting with a password key.

Additionally, some SAs may have home-based staff using QIES software installed on home workstations. Such home-based systems must be protected with encryption software as described above and comply with CMS controls as defined in the ARS.

Minimum and Recommended Client Requirements: EXISTING or NEW EQUIPMENT		
Component	Minimum	Minimum or Higher Required for Survey Process Implementation Recommended for Other
<i>Processor</i>	Pentium Class (or equivalent) @ 1.8 GHz	Pentium Class (or equivalent) @ 2.2 GHz
<i>Memory (RAM)</i>	4GB	8 GB
<i>Available Disk Space</i>	4GB	10 GB on SATA 2 drive at 7200 RPM
https://www.cms.gov/research-statistics-data-and-systems/cms-information-technology/informationsecurity/information/acceptable-risk-safeguards-50x	https://www.cms.gov/research-statistics-data-and-systems/cms-information-technology/informationsecurity/information/acceptable-risk-safeguards-50x	https://www.cms.gov/research-statistics-data-and-systems/cms-information-technology/informationsecurity/information/acceptable-risk-safeguards-50x
<i>Operating System*</i>	Windows 10 – 32 bit Windows 10 – 64 bit	Windows 10 – 32 bit Windows 10 – 64 bit Windows 11- 64 bit
<i>Secure Access/Encryption (See Encryption Policy)</i>	Required – See Encryption Policy	Required – See Encryption Policy
<i>Anti-virus</i>	Current License	Current License
<i>Universal Serial Bus Port</i>	One	Two
<i>Removable Media (see Encryption Policy)</i>	USB Drive 2.0	USB Drive 3.0
<i>Pointing Device</i>	Mouse or equivalent (e.g., trackball or touchpad)	Mouse or equivalent (e.g. trackball or touchpad) and pen/stylus for tablet
<i>Network Interface Card (See CMS ARS security guidelines for acceptable wireless configurations)</i>	Wired for network connectivity; and wireless network cards must support WPA-2 level encryption	Wired for network connectivity; and wireless network cards must support WPA-2 level encryption
<i>External USB Hub</i>	2 external USB sockets	3 external USB sockets

Minimum and Recommended Client Requirements: EXISTING or NEW EQUIPMENT		
Component	Minimum	Minimum or Higher Required for Survey Process Implementation Recommended for Other
<i>Audio</i>	Standard built-in speakers	Attachable microphone and standard built-in speakers
<i>Battery (laptop or tablet)</i>	6-cell lithium-ion	6-cell lithium-ion
<i>QIES Browser**</i>	Internet Explorer v 11.0 compatibility mode with TLS 1.2 settings	Internet Explorer v 11.0 compatibility mode with TLS 1.2 settings
<i>iQIES Browser**</i>	Chrome Safari Microsoft Edge	Chrome Safari Microsoft Edge

Note: Operating systems need to be current with all Windows security updates.

** Internet Explorer 11 will reach End-Of-Life (EoL) June 15, 2022, after which time it can no longer be used in QIES.

Per the Internet Explorer Support Lifecycle Policy FAQ (<https://support.microsoft.com/en-us/gp/microsoft-internet-explorer>), only the most current version of Internet Explorer available for a supported operating system will receive technical support and security updates.

Internet Explorer v 9.0 and v 10.0 is no longer supported as of January 1st 2016. Only Internet Explorer v 11.0 running in compatibility mode is currently supported.

Due to new CMS security requirements, all browsers must have the TLS 1.2 setting enabled.

CLIA FY25 Budget Call Letter Tables

Table 1 Certificate of Compliance Projected FY25 Workload

Certificate of Compliance						
State	Initial/Recert Count	Initial/Recert Hours	Followup/Revisit Count	Followup/Revisit Hours	Travel Hours Adjustment	Total CoC Survey Hours
Alabama	217	2,777	64	268	(111)	2,934
Alaska	32	388	10	39	(11)	416
Arizona	194	2,277	58	234	(75)	2,436
Arkansas	171	2,227	52	219	210	2,657
California	774	9,310	240	980	34	10,324
Colorado	168	1,942	51	203	26	2,171
Connecticut	93	1,081	29	115	(15)	1,181
Delaware	24	262	7	27	(18)	272
District of Columbia	10	105	3	12	(14)	103
Florida	644	7,345	200	796	(84)	8,057
Georgia	282	3,509	87	362	74	3,946
Hawaii	26	308	9	37	53	397
Idaho	68	893	20	84	(58)	919
Illinois	222	2,697	69	287	(48)	2,935
Indiana	106	1,276	32	132	9	1,417
Iowa	143	2,026	45	193	(115)	2,104
Kansas	118	1,643	35	155	239	2,038
Kentucky	165	2,197	50	213	127	2,537
Louisiana	102	1,288	29	120	59	1,467
Maine	26	371	7	30	(4)	398
Maryland	165	1,958	50	200	(164)	1,994
Massachusetts	152	1,918	48	203	(96)	2,025
Michigan	143	1,728	44	177	(157)	1,748
Minnesota	119	1,531	38	158	(36)	1,654
Mississippi	236	3,076	73	309	(139)	3,246
Missouri	140	1,771	42	173	753	2,696
Montana	50	660	16	68	(15)	713
Nebraska	98	1,317	29	122	(60)	1,379
Nevada	72	906	22	90	(105)	892
New Hampshire	31	408	9	36	(15)	430
New Jersey	226	2,623	70	277	26	2,926
New Mexico	29	340	7	28	42	410
New York	398	4,602	122	488	113	5,202
North Carolina	332	3,976	101	411	(22)	4,365
North Dakota	27	381	9	39	30	450
Ohio	123	1,489	36	145	(147)	1,487
Oklahoma	102	1,369	32	137	(40)	1,465
Oregon	110	1,415	33	140	(23)	1,531
Pennsylvania	193	2,389	58	239	(39)	2,590
Puerto Rico	450	6,370	139	605	2	6,978
Rhode Island	18	200	6	23	(7)	216
South Carolina	175	2,048	54	221	(81)	2,188
South Dakota	53	673	16	67	8	749
Tennessee	284	3,623	88	373	35	4,031
Texas	474	5,830	147	604	428	6,862
Utah	114	1,353	33	132	(100)	1,384
Vermont	10	127	2	8	16	151
Virginia	205	2,520	63	257	(31)	2,746
West Virginia	45	625	13	55	(35)	646
Wisconsin	138	1,851	42	175	(180)	1,846
Wyoming	29	372	8	33	(5)	400
Totals	8,326	103,371	2,547	10,502	238	114,111

data sources

- national count of Certificates of Compliance from CASPER 10B Report February 2024
- count of Certificates of Compliance by schedule code based on CASPER 86S Report February 2024
- FY23/FY22 survey hour averages by schedule code from Aspen Regional Office System (pulled from Federal Survey Dashboard March 2024)
- FY23/FY22 travel hour averages by state from Aspen Regional Office System (pulled from Federal Survey Dashboard March 2024)

Table 2 Certificate of Accreditation Projected FY25 Workload

Certificate of Accreditation						
State	Validation Count	Validation Hours	Followup/Revisit Count	Followup/Revisit Hours	Travel Hours Adjustment	Total CoA Survey Hours
Alabama	10	199	3	20	(5)	214
Alaska	2	40	1	7	(1)	46
Arizona	9	179	3	20	(4)	196
Arkansas	5	99	2	14	7	119
California	31	616	10	68	1	685
Colorado	7	139	3	20	1	161
Connecticut	3	60	1	7	(0)	66
Delaware	1	20	1	7	(1)	25
District of Columbia	1	20	1	7	(2)	25
Florida	33	656	10	68	(4)	719
Georgia	13	258	4	27	3	289
Hawaii	2	40	1	7	5	51
Idaho	2	40	1	7	(2)	45
Illinois	15	298	5	34	(3)	329
Indiana	9	179	3	20	1	200
Iowa	4	79	2	14	(4)	89
Kansas	4	79	2	14	9	102
Kentucky	6	119	2	14	5	137
Louisiana	11	219	4	27	7	252
Maine	2	40	1	7	(0)	46
Maryland	6	119	2	14	(6)	127
Massachusetts	7	139	3	20	(5)	155
Michigan	12	238	4	27	(13)	252
Minnesota	13	258	4	27	(4)	281
Mississippi	4	79	2	14	(3)	90
Missouri	6	119	2	14	33	166
Montana	2	40	1	7	(1)	46
Nebraska	3	60	1	7	(2)	64
Nevada	4	79	2	14	(7)	86
New Hampshire	1	20	1	7	(1)	26
New Jersey	8	159	3	20	1	180
New Mexico	3	60	1	7	5	71
New York	3	60	1	7	1	67
North Carolina	18	358	6	41	(1)	397
North Dakota	2	40	1	7	3	49
Ohio	17	338	6	41	(21)	357
Oklahoma	8	159	3	20	(3)	176
Oregon	4	79	2	14	(1)	92
Pennsylvania	12	238	4	27	(2)	263
Puerto Rico	2	40	1	7	0	47
Rhode Island	1	20	1	7	(1)	26
South Carolina	10	199	3	20	(5)	214
South Dakota	3	60	1	7	0	67
Tennessee	9	179	3	20	1	200
Texas	65	1,292	20	135	59	1,485
Utah	4	79	2	14	(4)	89
Vermont	1	20	1	7	3	29
Virginia	11	219	4	27	(2)	244
West Virginia	2	40	1	7	(2)	45
Wisconsin	8	159	3	20	(11)	168
Wyoming	1	20	1	7	(0)	26
Totals	420	8,345	150	1,013	23	9,381

data sources

- national count of Certificates of Accreditation from CASPER 10B Report February 2024
- count of Certificates of Accreditation by schedule code from CASPER 86S Report February 2024
- FY23/FY22 survey hour averages by schedule code from Aspen Regional Office System (pulled from Federal Survey Dashboard in March 2024)
- FY23/FY22 travel hour averages by state from Aspen Regional Office System (pulled from Federal Survey Dashboard in March 2024)

Table 3 Complaint Surveys Projected FY25 Workload

State	Complaint Surveys			
	Complaint Count	Complaint Hours	Travel Hours Adjustment	Total Complaint Survey Hours
Alabama	3	55	(1)	53
Alaska	7	127	(2)	125
Arizona	3	55	(1)	54
Arkansas	3	55	3	57
California	6	109	0	109
Colorado	3	55	0	55
Connecticut	3	55	(0)	54
Delaware	-	-	-	-
District of Columbia	-	-	-	-
Florida	38	690	(4)	687
Georgia	7	127	1	129
Hawaii	-	-	-	-
Idaho	3	55	(2)	53
Illinois	19	345	(3)	342
Indiana	6	109	0	109
Iowa	6	109	(4)	105
Kansas	3	55	5	59
Kentucky	2	36	1	38
Louisiana	-	-	-	-
Maine	1	18	(0)	18
Maryland	-	-	-	-
Massachusetts	-	-	-	-
Michigan	16	291	(13)	277
Minnesota	7	127	(2)	126
Mississippi	-	-	-	-
Missouri	5	91	21	112
Montana	5	91	(1)	90
Nebraska	5	91	(2)	88
Nevada	1	18	(1)	17
New Hampshire	6	109	(2)	107
New Jersey	5	91	0	91
New Mexico	7	127	8	135
New York	4	73	1	74
North Carolina	9	164	(0)	163
North Dakota	3	55	3	57
Ohio	9	164	(8)	155
Oklahoma	3	55	(1)	54
Oregon	9	164	(1)	162
Pennsylvania	1	18	(0)	18
Puerto Rico	-	-	-	-
Rhode Island	4	73	(1)	71
South Carolina	1	18	(0)	18
South Dakota	3	55	0	55
Tennessee	4	73	0	73
Texas	32	581	22	603
Utah	5	91	(3)	87
Vermont	-	-	-	-
Virginia	10	182	(1)	181
West Virginia	2	36	(1)	35
Wisconsin	28	509	(28)	481
Wyoming	2	36	(0)	36
Totals	299	5,432	(19)	5,413

data sources

- FY23/FY22 complaint survey count averages by state from Aspen Regional Office System (pulled from Federal Survey Dashboard in March 2024)
- FY23/FY22 complaint survey hour national average from Aspen Regional Office System (pulled from Federal Survey Dashboard in March 2024)
- FY23/FY22 travel hour averages by state from Aspen Regional Office System (pulled from Federal Survey Dashboard in March 2024)

Table 4

Proficiency Testing Deficiencies Projected FY25 Workload

State	Proficiency Testing	
	PT Failure Count	PT Hours
Alabama	38	144
Alaska	8	30
Arizona	4	15
Arkansas	27	103
California	11	42
Colorado	12	46
Connecticut	7	27
Delaware	2	8
District of Columbia	-	-
Florida	42	160
Georgia	60	228
Hawaii	-	-
Idaho	13	49
Illinois	27	103
Indiana	8	30
Iowa	25	95
Kansas	21	80
Kentucky	24	91
Louisiana	7	27
Maine	2	8
Maryland	2	8
Massachusetts	9	34
Michigan	20	76
Minnesota	8	30
Mississippi	54	205
Missouri	13	49
Montana	7	27
Nebraska	13	49
Nevada	7	27
New Hampshire	2	8
New Jersey	7	27
New Mexico	5	19
New York	38	144
North Carolina	16	61
North Dakota	7	27
Ohio	-	-
Oklahoma	25	95
Oregon	17	65
Pennsylvania	12	46
Puerto Rico	-	-
Rhode Island	-	-
South Carolina	18	68
South Dakota	4	15
Tennessee	41	156
Texas	76	289
Utah	5	19
Vermont	2	8
Virginia	16	61
West Virginia	11	42
Wisconsin	4	15
Wyoming	6	23
Totals	783	2,975

data sources

- FY23/FY22 Proficiency Testing Desk Review count averages by state from Aspen Regional Office System (pulled from Federal Survey Dashboard in March 2024)
- FY23/FY22 Proficiency Testing Desk Review hour national average from Aspen Regional Office System (pulled from Federal Survey Dashboard in March 2024)

Table 5 FTE Projections FY25

State	Total Survey Hours	Surveyor FTE	Administrative / Support Hours	Administrative / Support FTE	Supervisory Hours	Supervisory FTE	Total FTE
Alabama	3,346	2.23	2,509	1.43	478	0.27	3.94
Alaska	618	0.41	463	0.26	88	0.05	0.73
Arizona	2,700	1.80	2,025	1.16	386	0.22	3.18
Arkansas	2,936	1.96	2,202	1.26	419	0.24	3.46
California	11,160	7.44	8,370	4.78	1,594	0.91	13.13
Colorado	2,432	1.62	1,824	1.04	347	0.20	2.86
Connecticut	1,328	0.89	996	0.57	190	0.11	1.56
Delaware	305	0.20	229	0.13	44	0.02	0.36
District of Columbia	128	0.09	96	0.05	18	0.01	0.15
Florida	9,622	6.41	7,217	4.12	1,375	0.79	11.32
Georgia	4,591	3.06	3,443	1.97	656	0.37	5.40
Hawaii	448	0.30	336	0.19	64	0.04	0.53
Idaho	1,066	0.71	799	0.46	152	0.09	1.25
Illinois	3,709	2.47	2,781	1.59	530	0.30	4.36
Indiana	1,757	1.17	1,317	0.75	251	0.14	2.07
Iowa	2,393	1.60	1,795	1.03	342	0.20	2.82
Kansas	2,279	1.52	1,709	0.98	326	0.19	2.68
Kentucky	2,803	1.87	2,102	1.20	400	0.23	3.30
Louisiana	1,746	1.16	1,309	0.75	249	0.14	2.05
Maine	469	0.31	352	0.20	67	0.04	0.55
Maryland	2,129	1.42	1,596	0.91	304	0.17	2.51
Massachusetts	2,214	1.48	1,661	0.95	316	0.18	2.61
Michigan	2,353	1.57	1,765	1.01	336	0.19	2.77
Minnesota	2,091	1.39	1,568	0.90	299	0.17	2.46
Mississippi	3,541	2.36	2,656	1.52	506	0.29	4.17
Missouri	3,023	2.02	2,267	1.30	432	0.25	3.56
Montana	875	0.58	656	0.38	125	0.07	1.03
Nebraska	1,581	1.05	1,186	0.68	226	0.13	1.86
Nevada	1,022	0.68	766	0.44	146	0.08	1.20
New Hampshire	571	0.38	428	0.24	82	0.05	0.67
New Jersey	3,225	2.15	2,418	1.38	461	0.26	3.79
New Mexico	635	0.42	476	0.27	91	0.05	0.75
New York	5,487	3.66	4,115	2.35	784	0.45	6.46
North Carolina	4,986	3.32	3,740	2.14	712	0.41	5.87
North Dakota	583	0.39	437	0.25	83	0.05	0.69
Ohio	1,999	1.33	1,499	0.86	286	0.16	2.35
Oklahoma	1,790	1.19	1,342	0.77	256	0.15	2.11
Oregon	1,850	1.23	1,388	0.79	264	0.15	2.18
Pennsylvania	2,916	1.94	2,187	1.25	417	0.24	3.43
Puerto Rico	7,024	4.68	5,268	3.01	1,003	0.57	8.27
Rhode Island	314	0.21	235	0.13	45	0.03	0.37
South Carolina	2,488	1.66	1,866	1.07	355	0.20	2.93
South Dakota	886	0.59	665	0.38	127	0.07	1.04
Tennessee	4,460	2.97	3,345	1.91	637	0.36	5.25
Texas	9,239	6.16	6,930	3.96	1,320	0.75	10.87
Utah	1,580	1.05	1,185	0.68	226	0.13	1.86
Vermont	188	0.13	141	0.08	27	0.02	0.22
Virginia	3,231	2.15	2,423	1.38	462	0.26	3.80
West Virginia	767	0.51	575	0.33	110	0.06	0.90
Wisconsin	2,510	1.67	1,883	1.08	359	0.20	2.95
Wyoming	485	0.32	364	0.21	69	0.04	0.57
Totals	131,879	87.92	98,909	56.52	18,840	10.77	155.20

data sources

- Total survey hours from Tables 1,2,3,4
- ratio of administrative/support hours at 75% of survey hours
- ratio of supervisory hours at 14.29% of survey hours
- estimate of productive survey hours per surveyor FTE at 1500 hours per year
- estimate of productive work hours per administrative/support and supervisory FTE at 1750 hours per year

Table 6 Total FY25 Funding by State Agency

State	Total Hours	Hourly Rate	FY25 Funding
Alabama	6,333	\$77.07	\$488,085
Alaska	1,169	\$130.87	\$152,966
Arizona	5,111	\$90.58	\$462,967
Arkansas	5,558	\$90.93	\$505,358
California	21,124	\$107.58	\$2,272,553
Colorado	4,604	\$72.43	\$333,485
Connecticut	2,513	\$97.90	\$246,023
Delaware	577	\$112.28	\$64,829
District of Columbia	242	\$401.93	\$97,264
Florida	18,214	\$88.25	\$1,607,360
Georgia	8,690	\$82.18	\$714,115
Hawaii	848	\$240.25	\$203,745
Idaho	2,017	\$117.32	\$236,679
Illinois	7,020	\$164.50	\$1,154,785
Indiana	3,325	\$83.66	\$278,159
Iowa	4,530	\$84.35	\$382,146
Kansas	4,314	\$85.60	\$369,225
Kentucky	5,305	\$70.19	\$372,393
Louisiana	3,305	\$183.89	\$607,707
Maine	889	\$152.68	\$135,673
Maryland	4,029	\$98.46	\$396,689
Massachusetts	4,191	\$130.43	\$546,657
Michigan	4,455	\$98.89	\$440,539
Minnesota	3,958	\$82.29	\$325,722
Mississippi	6,702	\$82.31	\$551,692
Missouri	5,722	\$125.64	\$718,987
Montana	1,657	\$87.36	\$144,723
Nebraska	2,993	\$58.66	\$175,569
Nevada	1,934	\$97.63	\$188,850
New Hampshire	1,080	\$124.23	\$134,156
New Jersey	6,104	\$121.92	\$744,162
New Mexico	1,202	\$219.16	\$263,417
New York	10,386	\$170.84	\$1,774,364
North Carolina	9,438	\$66.13	\$624,139
North Dakota	1,103	\$71.88	\$79,309
Ohio	3,784	\$122.63	\$464,059
Oklahoma	3,388	\$150.39	\$509,458
Oregon	3,502	\$159.23	\$557,601
Pennsylvania	5,520	\$120.36	\$664,339
Puerto Rico	13,296	\$39.56	\$525,930
Rhode Island	594	\$141.67	\$84,154
South Carolina	4,710	\$63.18	\$297,566
South Dakota	1,677	\$61.26	\$102,760
Tennessee	8,443	\$100.66	\$849,855
Texas	17,489	\$118.98	\$2,080,888
Utah	2,990	\$107.12	\$320,283
Vermont	355	\$116.03	\$41,235
Virginia	6,116	\$96.79	\$591,979
West Virginia	1,452	\$177.26	\$257,396
Wisconsin	4,751	\$93.49	\$444,194
Wyoming	918	\$114.85	\$105,481
Totals	249,629	\$102.92	\$25,691,668

data sources

- Total hours from Tables 1,2,3,4
- FY24 CLIA State Agency awards used to calculate hourly rates
- Estimated FY24-FY25 CPI-U rate of 3.5%