SECRETAR
03 MAR 13

BAKER HEALTHCARE CONSULTING, INC.
SUITE 2000, BOX 82058
ONE AMERICAN SQUARE
INDIANAPOLIS, INDIANA
46282

DALE E. BAKER
PRESIDENT

March 5, 2003

Secretary of the Senate
Office of Public Records
232 Hart Building
Washington, DC 20510

Re: Untimely Filing of LD-2 for Year End 2002 Reports

Dear Secretary:

Baker Healthcare Consulting, Inc. is a very small firm with one full-time employee, Baker, and one full-time leased employee, Karen K. Siders. Ms. Siders' father had surgery l in January 2003 and died on Tuesday, February 25, 2003. Ms. Siders used the Family Medi Leave Act to be with her father and her family throughout this most difficult period.

As a result, normal secretarial activities were delayed and the reports were not filed c to an oversight by Dale E. Baker.

We hope that we have not inconvenienced your office with this oversight. Our inten always been, is, and will continue to be, to fully comply with the Lobbying Disclosure Act c 1995 and its interpretation.

Sincerely,

BAKER HEALTHCARE CONSULTING, INC.

Dale E. Baker

Dale E. Baker

Enclosures

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Clerk of the House of Representatives	Secretary of the Senate
Legislative Resource Center	Office of Public Records
B-106 Cannon Building	232 Hart Building
Washington, DC 20515	Washington, DC 20510

SECRETARY
03 MAR 13

LOBBYING REPORT

Lobbying Disclosure Act of 1995 (Section 5) - **All Filers Are Required To Complete This Page**

1. Registrant Name
Baker Healthcare Consulting, Inc.

2. Address ☐ Check if different than previously reported
One American Square, Suite 2000, Box 82058

3. Principal Place of Business (if different from line 2)
City: Indianapolis State/Zip (or Country) IN 46282

4. Contact Name: Dale E. Baker Telephone: 317-631-3613 E-mail (optional): BakerHealthcare@yahoo.com

5. Senate ID # 5764

6. House ID # 3356

7. Client Name ☐ Self
Valley Health System (Winchester Medical Center)

TYPE OF REPORT 8. Year 2002 Midyear (January 1-June 30) ☐ **OR** Year End (July 1-Dec

9. Check if this filing amends a previously filed version of this report ☐

10. Check if this is a Termination Report ☒ ⇨ Termination Date 12-31-02 11. No Lobbying

INCOME OR EXPENSES - Complete Either Line 12 OR Line 13

12. Lobbying Firms

INCOME relating to lobbying activities for this reporting period was:

Less than $10,000 ☒

$10,000 or more ☐ ⇨ $_____
Income (nearest $20,000)

Provide a good faith estimate, rounded to the nearest $20,000, of all lobbying related income from the client (including all payments to the registrant by any other entity for lobbying activities on behalf of the client).

13. Organizations

EXPENSES relating to lobbying activities for this rep period were:

Less than $10,000 ☐

$10,000 or more ☐ ⇨ $_____
Expenses (nearest $

14. REPORTING METHOD. Check box to indicate accounting method. See instructions for description of

☐ **Method A.** Reporting amounts using LDA definiti

☐ **Method B.** Reporting amounts under section 6033 Internal Revenue Code

☐ **Method C.** Reporting amounts under section 162(Internal Revenue Code

Signature Dale E. Baker

Printed Name and Title Dale E. BAKER, President

LD-2 (REV. 6/98) PA

Registrant Name Baker Healthcare Consulting Client Name Valley Health System

LOBBYING ACTIVITY. Select as many codes as necessary to reflect the general issue areas in which th engaged in lobbying on behalf of the client during the reporting period. **Using a separate page for each co** information as requested. Attach additional page(s) as needed.

15. General issue area code MMM (one per page)

16. Specific lobbying issues

See Attached

17. House(s) of Congress and Federal agencies contacted ☐ Check if None

Senate

House of Representatives

18. Name of each individual who acted as a lobbyist in this issue area

Name	Covered Official Position (if applicable)
Dale E. BAKER	

19. Interest of each foreign entity in the specific issues listed on line 16 above ☐ Check if None

Signature Dale E. Baker Date March 6, 2

Printed Name and Title Dale E. BAKER

Form LD-2 (Rev.6/98) Page

Registrant Name Baker Healthcare Consulting Client Name Valley Health System

Information Update Page - Complete ONLY where registration information has changed.

20. Client new address

21. Client new principal place of business (if different from line 20)

City State/Zip (or Country)

22. New general description of client's business or activities

LOBBYIST UPDATE

23. Name of each previously reported individual who is **no longer** expected to act as a lobbyist for the client

ISSUE UPDATE

24. General lobbying issues previously reported that **no longer** pertain

AFFILIATED ORGANIZATIONS

25. Add the following affiliated organization(s)

Name	Address	Principal Place of Bus (city and state or cou

26. Name of each previously reported organization that is **no longer** affiliated with the registrant or client

FOREIGN ENTITIES

27. Add the following foreign entities

Name	Address	Principal place of business (city and state or country)	Amount of contribution for lobbying activities	(p c

28. Name of each previously reported foreign entity that **no longer** owns, <u>or</u> controls, <u>or</u> is affiliated with the registrant affiliated organization

Signature Dale E. Baker Date March 6, 200

Printed Name and Title Dale E. Baker, President

Form LD-2 (Rev. 6/98)

EXECUTIVE SUMMARY

The Benefit Improvement & Protection Act of 2000 (BIPA) extended Medicare wage index reclassifications from an annual reclassification to a thre year reclassification to increase the predictability and consistency of Medicare payments for acute care hospitals. The Centers for Medicare & Medicaid Serv (CMS) subsequently interpreted this provision in 42 C.F.R. 412.230 in the Au 1, 2001 Federal Register to prohibit hospitals from seeking an annual roll forw reclassification request. This interpretation, in our judgment, decreases the predictability and consistency of Medicare payment, contrary to the intent of BIPA.

Valley Health System responded last spring during the comment period wrote Secretary of Health & Human Services Tommy Thompson a letter on August 15th asking him to resend this regulation. On September 27th CMS sen response to Mr. Wolf (this was of course after September 11th) denying the rec In March of 2002 the Hospital sent timely comments to Secretary Thompson's newly constituted committee on regulatory reform, and our consultant discuss the need for the annual roll forward at a CMS open door forum on April 4, 20 with key CMS executives (Tom Grissom and Tom Gustafson). Also, yesterda National Rural Health Association contacted Mr. Tom Scully, Administrator o CMS asking him to withdraw this regulation. Time is of the essence there is virtually no cost to the taxpayers of this proposal. CMS personnel have told u the administrative costs of processing these geographic reclassification reques deminimus and reclassifications are budget neutral.

We ask that the Virginia Congressional delegation, either individua or as a group, contact either Tommy Thompson, Secretary of Health & Human Services and/or Tom Scully, Administrator of CMS, and ask that proposed Medicare rule: "Changes to the Hospital Inpatient Prospective Payment System", which is expected to be published by approximately M 2002 and currently is in final clearance, be amended to strike the requirer added to the above-referenced regulation that prohibits an annual roll forward wage index reclassification.