

Supporting Statement – Part B
Early Retiree Reinsurance Program Survey

Collections of Information Employing Statistical Methods

1. Describe (including a numerical estimate) the potential respondent universe and any sampling or other respondent selection method to be used. Data on the number of entities (e.g., establishments, State and local government units, households, or persons) in the universe covered by the collection and in the corresponding sample are to be provided in tabular form for the universe as a whole and for each of the strata in the proposed sample. Indicate expected response rates for the collection as a whole. If the collection had been conducted previously, include the actual response rate achieved during the last collection.

The potential respondent universe is a subset of the number of plan sponsors that have received Early Retiree Reinsurance Program (ERRP) reimbursement for at least one employment-based plan. That universe is comprised of the following plan sponsors:

- Sponsors with applications for which we've already sent the expired version of the survey, but for which we received no response.
- Sponsors with applications for which the sponsor previously responded to the expired version of the survey, but for which additional ERRP funds were sent for the application after the date the sponsor responded to the survey.
- Sponsors with applications for which ERRP funds have been received, but for which no survey was sent (due to PRA expiration of the previous version of survey).
- Sponsors with applications for which the sponsor, in its previous responses to the expired version of the survey, indicated that it had spent none, or only some, of their received ERRP reimbursement.

During fiscal year 2013, we estimate there will be 2,523 such plan sponsors. There will be no sampling (i.e., we will direct every such plan sponsor, to respond to the survey).

We estimate that 1,116 of the universe of entities will be State and local government units, and 1,407 will be establishments.

We estimate an anticipated response rate, for the collection as a whole, of 36%. The previous response rate was 50%. However, the survey was previously sent to a different universe of plan sponsors. It is expected that the universe of plan sponsors that the revised survey will be sent to, will yield a lower overall response rate, as explained Burden Estimate section of the Supporting Statement included in this PRA submission.

2. Describe the procedures for the collection of information including:

- Statistical methodology for stratification and sample selection,

We will not be employing any statistical methodology for stratification and sample selection. Rather, we will be surveying every type of plan sponsor identified in our response to Question 1 of this Supporting Statement, Part B.

- Estimation procedure,

HHS will not derive any estimates or projections from the collection of information.

- Degree of accuracy needed for the purpose described in the justification,

Some of the questions in the survey ask what plan sponsors intend to do. It is impossible for sponsors to answer such questions 100% accurately, as they cannot know with certainty whether they will actually do what they presently intend to do, or how they would have reacted in the absence of existing circumstances. However, we expect that most of plan sponsors' responses to these questions will ultimately prove to be accurate, and this degree of accuracy will be sufficient to serve the survey's purposes, which is primarily to assess how ERRP plan sponsors are using or intend to use ERRP funds.

- Unusual problems requiring specialized sampling procedures

None

- Any use of periodic (less frequent than annual) data collection cycles to reduce burden.

No.

3. Describe methods to maximize response rates and to deal with issues of non-response. The accuracy and reliability of information collected must be shown to be adequate for intended uses. For collections based on sampling, a special justification must be provided for any collection that will not yield 'reliable' data that can be generalized to the universe studied.

We intend to maximize response rates by sending periodic reminders to plan sponsors that have not completed the survey.

As specified above, this collection is not based on sampling. Rather, every type of plan sponsor identified in our response to Question 1 of this Supporting Statement, Part B, will

be directed to respond to the survey. CMS intends to address potential issues related to non-response by ensuring that all findings from the survey are reported with appropriate caveats, and will not extrapolate findings based on a subset of plan sponsors to the larger group.

4. Describe any tests of procedures or methods to be undertaken. Testing is encouraged as an effective means of refining collections of information to minimize burden and improve utility. Tests must be approved if they call for answers to identical questions from 10 or more respondents. A proposed test or set of tests may be submitted for approval separately or in combination with the main collection of information.

We intend to use the survey instrument itself as a test, by first directing a relatively small percentage of plan sponsors in the universe, to complete the survey. The ERRP Program has a contact center that fields inquiries about the program. To the extent these plan sponsors give us reason to believe the survey instrument is overly burdensome, and/or to the extent we believe the responses to the survey questions demonstrate that we should revise the survey instrument to improve utility, we will consider revising the survey instrument accordingly. We would submit revisions to this PRA package that would include the revised survey instrument.

5. Provide the name and telephone number of individuals consulted on statistical aspects of the design and the name of the agency unit, contractor(s), grantee(s), or other person(s) who will actually collect and/or analyze the information for the agency.

As specified above, there are no statistical aspects of the design or sampling of this survey. The following contractor will collect and analyze the survey responses for CMS:

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