Supporting Statement – Part A

State Health Insurance Assistance Program (SHIP) Client Contact Form, Public and Media Activity Report Form, and Resource Report Form

Specific Instructions

A. Background

The State Health Insurance Assistance Program (SHIP), created under Section 4360 of the Omnibus Budget Reconciliation Act (OBRA) of 1990 (P. L. 101-508) (42 USC 1395b-4, attached), authorizes the Secretary of the Department of Health and Human Services (DHHS) to make grants to states to establish and maintain health insurance advisory services programs for Medicare beneficiaries. The purpose of the program is to develop and strengthen the capability of states to provide beneficiaries with information, counseling and assistance on adequate and appropriate health insurance coverage.

Grant funds are awarded by the Administration for Community Living (ACL) to states to provide information, counseling and assistance to beneficiaries relating to Medicare and Medicaid matters as well as Medicare supplement policies, managed care options including Medicare Advantage, long-term care insurance, and other health insurance benefit information. States may carry out the objective of the grants by providing one-on-one counseling, either face-to-face or over the telephone, by trained paid and volunteer staff, by distributing written informational materials, or by holding group educational seminars and presentations and outreach events.

The current Client Contact Form, Public and Media Activity Report Form, and Resource Report Form have been used to collect data to evaluate program effectiveness and improvement. All recommended changes were captured in the last OMB submission. These forms were approved by OMB effective through July 31, 2016. In this submission, we are requesting to extend this data collection with no changes made to these forms. ACL foresees no changes and therefore will maintain the current forms in their present state and seek to get approval through 2019.

In April 2011, the Medicare-Medicaid Coordination Office awarded design contracts to 15 states to implement State Demonstrations to Integrate Care for Medicare-Medicaid Individuals (Dual eligible). The overall goal of this initiative is to develop, test and validate fully integrated delivery system and care coordination models. The Financial Alignment Initiative is a unique Federal-state partnership to test aligning the service delivery and financing of the Medicare and Medicaid programs to better serve Medicare- Medicaid individuals. As part of this effort, there is a need for strong beneficiary support, education and outreach in each State that is implementing a Financial Alignment model, including options counseling for beneficiaries. State Health Insurance Assistance Programs (SHIPs) and Aging and Disability Resource Centers (ADRCs) have longstanding history and relationships with beneficiaries and are well situated to provide this service locally in each State.

A key component of this initiative will be tracking and reporting on the types of questions being asked and the type of information and assistance SHIPs/ADRCs are providing to these dually eligible beneficiaries. This information will be reported through the SHIP National Performance Reporting System and shared with the Medicare-Medicaid Coordination Office on a quarterly basis to ensure services to dual eligible are within the scope of the cooperative agreement requirements and support the Financial Alignment models.

B. Justification

1. Need and Legal Basis

Section 4360(f) of OBRA 1990 requires the Secretary to provide a series of reports to the U.S. Congress on the performance of the program and its impact on beneficiaries and to obtain important informational feedback from beneficiaries. The Medicare Modernization Act (MMA) of 2003 required SHIPs to be actively engaged in the implementation of the Medicare Prescription Drug Program (Part D). MIPPA legislation and Affordable Care Act legislation required SHIPs to provide enrollment assistance for the Limited Income Subsidy (LIS) and Medicare Savings Program (MSP). The goal is to ensure that beneficiaries are making an informed choice, regardless of whether they stay in Original Medicare or choose new options.

ACL measures States' progress by conducting an analysis of SHIP data as submitted in the SHIP data system. This data includes the measurements of the number of one-on-one client contacts, the number of contacts during which enrollment was the topic, the number of contacts with people with incomes less than 150% of the Federal Poverty Level, the number of contacts with people with disabilities, and the number of contacts during which fraud/fraud abuse was the topic. ACL is able to conduct this analysis through the collection of data that include three separate forms which are Public and Media (PAM), Client Contact Forms, and Resource Reports all which help to contribute to the overall success of the program. Public and Media (PAM) forms capture activity that can include an in-person interactive presentation to the public conducted by a SHIP. A client contact includes all contacts between a counselor or staff and a client, which may include Medicare or Medicaid beneficiaries, seniors, and their family members or others working on behalf of a client. A Resource Report allows a state SHIP Director to report data on SHIP counselors, coordinators, and staff within their state for each grant year. Essentially the data collected gives states a sense of how many beneficiaries have been reached and have received education on health insurance as it pertains to Medicare.

2. Information Users

The data will be accumulated and analyzed to measure SHIP performance in order to determine whether and to what extent the SHIPs have met the goals of improved service to beneficiaries and better understanding by beneficiaries of their health insurance options. Further, the information will be used in the administration of the grants, to measure performance and appropriate use of the funds by the state grantees, to identify gaps in services and technical support needed by SHIPs, and to identify and share best practices.

3. Use of Information Technology

While the forms are completed manually by many individual SHIP-paid and volunteer counselors, numerous grantees use an automated or electronic data transfer technology to accumulate the data and transmit it to ACL. In order to minimize the burden, ACL has employed an internet-based data collection tool for entry of the accumulated data by the state grantees. The forms are relatively simple to use and in an electronic fill-in format. No signatures are required for these forms.

4. **Duplication of Efforts**

The data to be collected from the SHIP grantees are unique to this grant program and are based significantly on the legislatively mandated reporting requirements. The data is being gathered from and applies only to these federally mandated grant programs.

5. **Small Businesses**

This information collection will not impact any small entities.

6. **Less Frequent Collection**

This information collection is necessary to enable fulfillment of the Congressional reporting requirements in Section 4360 of OBRA 1990. There are three forms required as part of this data collection, a Client Contact Form, a Public and Media Activity Report Form, and a Resource Report Form. When the SHIP program began it was a demonstration program there was a moderate burden of reporting required of the grantee. The grantee had to provide quarterly reporting for Client Contact Form, a Public and Media Activity Report Form and an annual Resource Report. Although not in any specific required format, those reports summarized program activities for the period as well as reported financial status information. The reporting burden was reduced to semi-annually for the Client Contact Form, a Public and Media Activity Report Form during an interim period, but with the implementation of the Medicare Modernization Act of 2003, the reporting requirement was returned to quarterly, effective July 1, 2005, and then again increased to monthly in 2014 for the Client Contact Form, a Public and Media Activity Report Form because of the implementation of the Affordable Care Act so that CMS previously and now ACL could have near real time data available in order to assess the work of SHIPs, respond to beneficiary needs, and for reporting to Congress on the activities required under MMA and ACA.

The frequency in reporting for the Client Contact Form and the Public and Media Activity Report Form is monthly, and for the Resource Report Form, is annually.

7. **Special Circumstances**

There are no special circumstances.

8. **Federal Register/Outside Consultation**

The 60-day Federal Register notice published on Tuesday, April 19, 2016.Vol. 81, Page 22983. No comments were received.

9. **Payments/Gifts to Respondents**

Respondents are primarily volunteers working for recipients of grants from ACL. The terms and conditions of the grants require collection of this information. No specific funds are being paid to respondents for furnishing this information.

10. **Confidentiality**

The information collected will be held private to the extent provided by law. The SHIPs are required as a condition of the grant to maintain appropriate security measures to assure the privacy of individuals that receive SHIP services. None of the personally identifying information will be passed beyond the state program, i.e., no personally identifying information will be forwarded to ACL for analysis. Any results of the information collection will be made public in aggregate statistical form only.

11. **Sensitive Questions**

The information to be collected includes beneficiary zip code, age range, income, gender, disability, and ethnicity/race. This information is necessary to evaluate whether a SHIP is adequately making its services available to populations that are hard-to- reach and underserved due to language, literacy, location and culture. This information will be aggregated at the state level and will not be identified or associated with any individuals.

12. **Burden Estimates (Hours & Wages)**

A respondent can be a counselor, coordinator, or data entry specialist that is employed by the SHIP. Burden estimates are calculated by combining respondents time spent on the program, which is captured in the Resource Report. The total time is then categorically broken down by the type of respondent and then allocated proportionately to the corresponding respondent.

The value of respondent time is based on the average hourly earnings of all production and nonsupervisory workers on private nonfarm payrolls (as determined by the Bureau of Labor Statistics). In order to develop a clear cost burden amount, the SHIP program applies a simple equation. The estimated dollar value of respondent time for 2016 is $23.56 per hour plus the fringe benefit amount at a rate of 12% yields a $26.39 dollar amount. {* Source of value of volunteer time = Independent Sector. http://www.independentsector.org/volunteer_time.

The value of volunteer time is based on the average hourly earnings of all production and nonsupervisory workers on private nonfarm payrolls (as determined by the Bureau of Labor Statistics). The SHIP-Paid or In-Kind paid at an average hourly wage of $20.76 plus fringe of 44.61% yield a $30.02 total compensation per hours. The SHIP-Paid or In-Kind paid respondent is determined by compiling the data for the networking and calculating an average. The fringe amount of 44.61% came from the Independent Sector website: (http://www.independentsector.org/volunteer_time, which provided data on both salary and fringe. When these two rates are combined based on the total number of hours spent on the program is equal to a $29.08 rate per hour. To conservatively account for change in cost over the next 3 years the SHIP program has projected the total amount by roughly 7.5% which makes the total compensation amount $31.29 in years 2016- 2019.

ACL estimates the respondent burden hours to complete the Client Contact Form is 0.08833 (5 and 1/2 minutes) per submission. ACL estimates the respondent burden hours to complete the Public and Media Activity Report Form are 0.08833 (5 and1/2 minutes) per submission. (Note: We did multiple time trials entering forms from a paper stack and entering directly into the web form. We tested with naïve and experienced users. And we tested records for new clients' vs. existing clients. On average, both the Client Contact Form and Public and Media Activity Report Form were entered in under 6 minutes (which we rounded up to 6 minutes). ACL estimates the respondent burden hours to prepare and complete the Resource Report Form is 1 hours per submission. These estimates are based on an internal assessment of the materials and feedback from the end users' evaluation

The total annual hours requested is calculated as follows:

Table 1
Summary of Hours Burden by Type of Forms
(Estimates for CY2016)

In total, ACL estimates that it will receive 3,698,054.00 responses. This would amount to 326,752.34 total annual hours.

Responses	**Client Contact Form**	**Public and Media Activity**	**Resource Report Form**	**Summary**
Expected Responses	3,600,000.00	98,000.00	54	3,698,054.00
Overall Hours Per submission	0.08833	0.08833	4	NA
Annual Burden Hours	317,988	8656.34	216	326,860.34

Table 2
Total Cost Burden by Forms
(Estimates for CY2016)

The estimated wage burden for the all three forms (Client Contact, Public and Media Activity Report and Resource Report) is $7,538,176.48. The wage burden is based on an estimated total compensation rate of

$31.29 * per hour.

Responses	Client Contact Form	Public and Media Activity Report Form	Resource Report Form	Total
Annual Burden Hours	317,988	8,656.34	216	326,860.34
Hourly Compensation	$31.29	$31.29	$31.29	$31.29
Total Cost Burden	$9,949,844.52	$270,856.88	$6758.64	$10,227,460.04

* Source of value of volunteer time = Independent Sector. http://www.independentsector.org/volunteer_time. The estimated dollar value of volunteer time for 2016 is $23.07 per hour. The value of volunteer time is based on the average hourly earnings of all production and nonsupervisory workers on private nonfarm payrolls (as determined by the Bureau of Labor Statistics).

Independent Sector takes this figure and increases it by 12 percent to estimate for fringe benefits. For SHIPs, 26% of all counselors, coordinators, and other staff hours were volunteer hours for a 12 month period ending 31 Mar 2015. The remaining 74% of hours were SHIP-Paid or In-Kind paid at an average hourly wage of $20.76 plus fringe of 44.61% = $30.02 total compensation per hours. Combining volunteer and paid hour's rates yields a weighted total compensation rate of $28.23 per hour. Projected to 2016, the estimated hourly total compensation rate is $31.29 per hour.

Table 3
Summary of Burden Hours Comparison CY2014 to CY2016

The overall estimated burden hours will increase by 3,704 (CY2015 Burden hours - CY2016 Burden hours). The overall number of expected respondents will increase by 3,829. The expected number of responses will increase by 44,146. These increases are based on projected future service growth and projected future increases in staffing to accommodate the increased service demand.

	CY2015 Number of Respondents	**CY2015 Number of Responses**	**CY2015 Annual Burden Hours**	**CY2015 Annual Burden Dollars**	**CY 2016 Number of Respondents**	**CY2016 Number of Responses**	**CY2016 Annual Burden Hours**	**CY2016 Annual Burden Dollars**
Client Contact Form	6,036	3,558,076	314,284	$9,833,946	8,000	3,600,000	317,988	$9,949,844
Public and Media Form	2,135	97,778	8,636	$270,220	4,000	100,000	8,833	$276,384
Resource Report Form	54	54	216	$6758.64	54	54	216	$$6758.64

Total	8,225	**3,656,070**	**188,083**	**$5,244,502**		**12,054**	**3,700,216**	**327,037**	**$10,229,363.15**

*Please note that we are using the 2015 data because the 2016 data is still being collected.
**Also note that the number of respondents is not summed across the three forms since the same individuals can complete all three forms.

Most of the data being requested in this instrument, under the mandate in Section 4360 of OBRA 1990, is information that any prudent manager of a public sector program would normally collect and publish in the course of managing the program. In fact, most of the programs are or will be required by their own State leaders to provide information similar to that being solicited by the instrument. This instrument is designed to combine with any state level information collection in order to simultaneously fulfill any existing or anticipated state level reporting requirements.

ACL and its SHIP data system System contractor are currently working with several SHIPs on their state proprietary systems so that they can meet the specifications for) SHIP data system reporting. These states do however have the option to submit data directly into the internet-based data system. Any training or other preparation, or resources needed, will be provided through SHIP grant funds.

These forms will be completed, primarily, by volunteers at no actual cost.

13. **Capital Costs**

No capital or operational costs.

14. **Cost to Federal Government**

Costs to the Federal Government include contractor time for development of the performance measurement process for the SHIPs, and for maintenance of a database to facilitate accumulation, analysis and feedback of the data. The total future cost is estimated at $893,969 per year.

15. **Changes to Burden**

Overall Burden hours and expected number of respondents (Increase in burden):
The overall burden of hours and expected number of respondents increase is based on projected future service growth and projected future increases in staffing to accommodate the increased demand to utilize the SHIP network to raise awareness about new ACL policies and /or outreach initiatives.

Time to complete all forms (No Increase in burden):
The time estimate to complete each Client Contact Form, Public and Media Activity Report Form, and Resource Report Form all remain unchanged since the last OMB submission. Based on testing conducted in the course of development of these information collection forms, it is estimated that it takes a respondent about 5 and ½ minutes to complete the Client Contact Form and 5 and ½ minutes to complete the Public and Media Activity Report Form. Based on direct communication with State SHIP Directors, it takes a respondent a median of 120 minutes to complete the Resource Report Form. There are approximately 3,500,000 client contacts per year, approximately 97,700 public and media events per year, and 54 state-level resource reports per year.

Process for submitting forms (No Increase in burden):
The process for filling out the forms is now totally automated and SHIPs are expected to file the forms electronically through the SHIP web site http://www.shiptalk.org. All SHIPs have access to this web site. There is no further burden or obligation beyond filling out each form on-line. For some SHIPs with State level electronic data collection systems, arrangements have been made to directly upload the necessary data to https://shipnpr.acl.gov.No further burden is required in this case either.

16. Publication/Tabulation Dates

Data collection:	Monthly for Client Contact Form and Public and Media Activity Report Form; annually for Resource Report Form. The SHIP grant year is April 1-March 31.
Data processing:	Quarterly
Data Analysis:	Quarterly and annually
Report preparation:	Quarterly and annually

17. Expiration Date

Displaying the expiration date is not problematic.

18. Certification Statement

N/A