

**SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION**

A. Justification

1. Explain the circumstances that make the collection of information necessary.

Background

This is a revision request for the Office of Management and Budget (OMB) approval for the modification and use of the Data Performance Reports and Information Collection tool for the State Health Insurance Assistance Program (SHIP) under OMB 0985-0040 that expires September 30, 2020. This request also combines the discontinued Senior Medicare Patrol (SMP) OIG Report data collection under OMB 0985-0024.

The purpose of this data collection is to collect performance data from grantees, grantee team members and partners. Congress requires this data collection for program monitoring and Government Performance Results Act (GPRA) purposes. This data collection allows ACL and the Center for Innovation and Partnership (CIP) to communicate with Congress and the public on the SHIP, the SMP program, and the Medicare Improvements for Patients & Providers Act (MIPPA) program. In addition to the SHIP Data Performance Reports and Information Collection under OMB 0985-0040, ACL requests to incorporate the discontinued SMP Report collection OMB 0985-0024.

The SHIP, SMP, and MIPPA programs are located in each of the 50 states, the District of Columbia, Puerto Rico, Guam and the U.S. Virgin Islands. In order to ensure that grantees report activity accurately and consistently it is imperative that these data collection tools remain active. The respondents for this data collection are grantees, grantee team members, and partners who meet with Medicare beneficiaries and older adults' in-group settings and in one-on-one sessions to educate them on Medicare enrollment, Medicare benefits and subsidy programs, the importance of being aware of Medicare fraud, error and abuse, and having the knowledge to protect the Medicare system.

ACL is proposing to combine these collection tools to reduce burden on the grantees, grantee team members, and partners as many of the individuals working on these programs, collecting information and reporting results are the same at the local level. Combining these tools will reduce the need for duplicate or triplicate reporting of activities in separate tools further reducing the time and effort in reporting outcomes and activities. In addition, this combination will allow clarification on when, where, and how activities are conducted across these ACL programs further informing performance outcomes.

Authorizing Legislation:

SHIP and MIPPA Data Collection (OMB # 0985-0040):

Section 4360(f) of OBRA 1990 created the State Health Insurance Assistance Program (SHIP) and requires the Secretary to provide a series of reports to the U.S. Congress on the performance of the SHIP program annually. The law also requires ACL to report on the program's impact on beneficiaries and to obtain important feedback from beneficiaries. This tool captures the information and data necessary for ACL to meet these Congressional requirements, as well as, capturing performance data on individual grantees providing ACL essential insight for monitoring and technical assistance purposes.

In addition, the Medicare Improvements for Patients and Providers Act (MIPPA), initially passed in 2008, provided targeted funding for the SHIPs, area agencies on aging (AAAs), and Aging and Disability Resource Centers (ADRC) to conduct re enrollment assistance to Medicare beneficiaries for the Limited Income Subsidy (LIS) and Medicare Savings Program (MSP). These activities, collectively known as the MIPPA Program, have been funded nearly annually through a series of funding or extenders bills (PL 110-275 as amended by PL 111-148; PL 113-67; PL 113-93; PL 114-10; PL 115-123; and PL 116-59). Most recently Pub. L. 116–136, div. A, title III, §3803(a), Mar. 27, 2020, 134 Stat. 428, extended funding for MIPPA through November 30, 2020. This tool also collects performance and outcome data on the MIPPA Program providing ACL necessary information for monitoring and oversight.

SMP Data Collection (OMB # 0985-0024):

Under Public Law 104-208, the Omnibus Consolidated Appropriations Act of 1997, Congress established the Senior Medicare Patrol Projects in order to further curb losses to the Medicare program. The Senate Committee noted that retired professionals, with appropriate training, could serve as educators and resources to assist Medicare beneficiaries and others to detect and report errors, fraud and abuse.

Among other requirements, it directed the ACL to work with the Office of Inspector General (OIG) and the Government Accountability Office (GAO), to assess the performance of the program. The ACL employs this tool to collect performance and outcome data on the SMP Program necessary information for monitoring and oversight. ACL has shared this data and worked with HHS/OIG to develop SMP performance measures.

The HHS/OIG has collected SMP performance data and issued SMP performance reports since 1997. The information from the current collection is reported by the OIG to Congress and the public. This information is also used by ACL as the primary method for monitoring the SMP Projects.

This data collection will also support ACL in tracking performance outcomes and efficiency measures with respect to annual and long-term performance targets established in the Government Performance Results Modernization Act of 2010 (GPRMA). The Performance Data for the SHIP, SMP, and MIPPA, data collection will continue to provide data necessary to determine the effectiveness of the programs.

2. Indicate how, by whom, and for what purpose the information is to be used.

The data will be the primary method for monitoring the SMP, SHIP, and MIPPA, projects, identifying program implementation issues, and tracking areas for technical assistance activities. It will also be used to identify best practices in program implementation and to build sustainable program delivery systems as well as to develop resources to enable current and future grantees and program providers to learn from and replicate these practices. This 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 grantees.

The information from the current collection related to the SMP program is reported by the OIG to Congress and the public.

Finally, ACL uses the information reported by the SHIPs in an annual report to Congress on program activities and performance.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or forms of information technology.

Grantees are required to submit data electronically. The grantees maintain records of their program activities by entering data into the Office of Healthcare Information and Counseling (OHIC Database) which is comprised of several modules.

Those modules are as follows:

1. (SMP Program)- SMP Information and Reporting System (SIRS)
2. (SHIP & MIPPA Program)- SHIP Tracking and Reporting System (STARS)

The system is a web-based management tool that allows grantees to report, track, and manage information entered in the HIC Database system across programs and activities.

4. Describe efforts to identify duplication.

There is no similar data and this is the only method of data collection; all information collected by this data tool is unique. There will be no duplication in the method of data collection by combining these information collections.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

Grants are awarded to State agencies, Area Agencies on Aging, and non-profits; there will be no impact on small businesses.

6. Describe the consequences to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

This information collection is necessary to enable fulfillment of the Congressional reporting requirements in Section 4360 of OBRA 1990 and the Omnibus Consolidated Appropriations Act of 1997 (PL 104-208). If the reports were made less frequently the grantee would be less accountable to ACL, have less opportunity to receive constructive advice from ACL, and likely would miss opportunities for mid-course corrections. Monthly data reporting for these tools will inform the timely provision of technical assistance and identification of best practices to deliver high quality care to network and ensure timely response. The availability of this data collection tool also reduces the burden on the grantees and programs to develop their own tools to track the required data.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**

- **requiring respondents to submit more than an original and two copies of any document;**
- **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**
- **in connection with a statistical survey, that is not designed to produce valid and reliable results than can be generalized to the universe of study;**
- **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or that unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- **requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information’s confidentiality to the extent permitted by law.**

None of the above listed circumstances applies to this revision request.

8. As applicable, state that the Department has published the 60 and 30 Federal Register notices as required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB.

ACL published both a 60-day and 30-day Federal Register Notice in the Federal Register soliciting public comments on this revision request. The 60-day FRN published on December 30, 2019, Volume 84, Number 249, pages 71954-71956; there were public comments received during the 60-day public comment period. The 30-day FRN published on September 28, 2020, Volume 85, pages 60805-60808.

ACL received seventeen (17) comments from persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instruction and reporting format. *Since, these comments were not received during or based on the 60-day FRN public comment period; comment details are not listed, and the public comment selection is not checked in the ROCIS record entry.* ACL reviewed all of the comments; most were proposed additions to the topics discussed on the various forms.

Beneficiary Contact Form Comments & Responses

Topic/Issue	Comment	ACL Response
Beneficiary Demographics	Please add veteran status to track possible eligibility for benefits.	ACL added a new question to the Beneficiary Contact Form to capture veteran status.
Topics Discussed/Original Medicare	Please add Accountable Care Organizations.	ACL added “Accountable Care Organizations (ACOs)”.
	Add Part B conditional enrollment.	ACL added “Conditional Enrollment”.
	Include something to track equitable relief.	ACL added “Equitable Relief”.
	Please include late	ACL added “Late Enrollment

	enrollment penalties.	Penalty” to the Original Medicare Topics Discussed field and the Medicare Part D Topics Discussed field.
	Please include something to track issues with provider participation to the form.	ACL added “Provider Participation” to the Original Medicare Topics Discussed field, “Provider Network” to the Medicare Advantage Topics Discussed, “Pharmacy Network” to Medicare Part D Topics Discussed, and “Provider Participation” to the Medicaid Topics Discussed field.
Topics Discussed/Medigap	Include application assistance for Medigap plans Please include a way to track Medigap complaints and guaranteed issue right issues.	ACL added “Application Assistance”.
Topics Discussed/Medicare Advantage (MA and MA-PD)	Add Special Needs Plans to the form.	ACL added “Complaints” and “Guaranteed Issue Rights”.
	Include the new benefits for MA plans.	ACL added “Chronic Condition Special Needs Plans”, “Dual Eligible Special Needs Plans”, and “Institutional Special Needs Plans”.
	Include Integrated Care on the Beneficiary Contact Form.	ACL added “Supplemental Benefits (please explain)”.
Topics Discussed/ Other Prescription Assistance	Add a way to track prescription discount cards.	ACL did not include this item because it is included in more detailed Topics Discussed captured throughout the form.
Topics Discussed/Medicaid	Add MSP Application Submission.	ACL added “Prescription Discount Cards”.
	Add Appeals to the Medicaid section.	ACL deleted “Application Submission” from the Medicaid Topics Discussed field and added “Medicaid Application Submission”, “MSP Application Submission”, and “Medicaid Spend Down” to differentiate between the actions.
	Please include a way to track issues with Medicaid Expansion and Marketplace transitions to Medicare.	ACL added “Appeals/Grievances” and “QMB Improper Billing”.
	Include a way to track MSP recertification.	ACL added “Medicaid Expansion (ACA) Transitions to Medicare” to the Medicaid Topics Discussed field and “Marketplace Transition to Medicare” to the Other Insurance Topics Discussed field.
		ACL added “Medicaid Recertification” and “MSP

Topics Discussed/Additional Topic Details	Add PACE. Please add an easy way to track COVID-19 issues. Add a way to track issues with common benefits such as transportation and home health care. Add HSAs. Add a way to track IRMA questions. Please find a way to track assistance with setting up and assisting with MyMedicare accounts. Add Behavioral Health as a topic. Add Pooled Trusts. Add the following benefits: SNAP, LIHEAP, SSI, SSDI, Tax Benefits, Veterans Benefits, Housing, Subsidies, Lifeline, Public Assistance, Unemployment Assistance, Subsidized Transit Benefits, Other food Benefits, Other home benefits.	Recertification”. ACL added “Program of All-Inclusive Care for the Elderly (PACE)”. ACL added “COVID-19”. ACL added “ESRD”, “Mail Order Prescription”, “Mental Health”, “Opioids”, “Physical Therapy”, “Telehealth”, and “Transportation”. ACL added “Health Savings Accounts”. ACL added “Income Related Monthly Adjustment Amount”. ACL added “MyMedicare.gov Account”. ACL did not add this as it is encompassed by “Mental Health”. ACL did not add as it is not within the SHIP scope of work. ACL did not add these benefits as it is not within the SHIP scope of work.
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9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees with meaningful justification.

Respondents are ACL grantees and grantee team members. The terms and conditions of the grants require collection of this information. There are no payments or gifts to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy

There are no assurances of confidentiality.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

This collection will not collect any data of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- Indicate the number of respondents by affected public type (federal government, individuals or households, private sector – businesses or other for-profit, private sector – not-for-profit institutions, farms, state, local or tribal governments), frequency of response, annual hour burden, and an explanation of how the burden estimate.
- Provide estimates of annualized cost to respondents of the hour burdens for collections of information, identifying and using appropriate wage rate categories.

The information below shows the estimated annualized burden hours and costs for grantees to enter their data.

A respondent can be team member of one of the following programs:

- SHIP
- SMP
- MIPPA

Burden estimates are calculated by combining respondents time spent on the program, which is captured by a report from the system (either a Resource Report or Time Spent Report). The total time is categorically broken out by the type of respondent and 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)¹. In order to develop a clear cost burden amount, these ACL programs apply a simple equation. The estimated dollar value of respondent time for 2019 is \$25.43² per hour plus the fringe benefit amount at a rate of 12% (\$3.05) yields a \$28.48 dollar amount. {*Source of value of volunteer time = Independent Sector*}.

The value of volunteer time is based on the average hourly earnings of office and administrative support occupations (as determined by the Bureau of Labor Statistics). The program staff are paid at an average hourly wage of \$22.14³ plus fringe of 44.61% (9.88) yield a \$32.02 total compensation per hours. ACL's respondents are determined by compiling the data from the networking and calculating an average of all grantees. When both the volunteer rate and program staff rate are averaged based on the total is equal to a \$30.25 rate per hour. To conservatively account for change in cost over the next three years the SHIP, SMP, MIPPA, and ADRC/NWD programs have projected the total amount by roughly 7.5% (\$2.27) which makes the total compensation amount \$32.52 in years 2019- 2021.

¹ https://www.bls.gov/oes/current/oes_nat.htm#43-0000

² <https://independentsector.org/value-of-volunteer-time-2018/>

³ <https://www.bls.gov/oes/current/oes211099.htm>

ACL has also recalculated the burden hours for modifications to previously approved forms. ACL has reached its estimation based on a Booz Allen Hamilton (BAH) analysis of the current data system. BAH conducted several tests in the current system to ensure proper design of the new OHIC data system. Through the proper testing and vetting of the current data system BAH was able to design a system that would surpass the past performance of the of the former data systems and allow for an efficient transfer of data. ACL estimates the respondent burden hours to complete each form is based on a single submission. ACL has also created a dynamic functionality for several OHIC forms that allows users to add additional information into the following forms:

- SHIP
 - Beneficiary Contact Form
 - Media Outreach & Education Form
 - Group Outreach & Education Form
 - Training Form
 - Activity Form
 - Team Member Form
- SMP
 - Individual Interaction Form
 - Group Outreach and Education Interaction Form
 - Media Outreach and Education Interaction Form
 - Activity Form
 - Team Member Form

The time burden associated with these forms presumes that the respondent has completed the entire form with the additional information. In the forms provided ACL has broken out the additional information because it is not required to successfully submit any of the above-mentioned forms. (Note: *We did multiple time trials to simulate the amount of time it would take to complete a form and successfully submit a form for submission.*) These estimates are based on an internal assessment of the materials and feedback from the end users’ evaluations.

ACL estimates the respondent burden hours to prepare and complete all reports associated with this collection will be hours. This estimate is based on the current data systems ability to aggregate data and generate reports. By modifying several forms ACL has reduced the overall burden and grantees will no longer have to generate reports outside of the newly created data system.

Form Name	Estimated Time in Minutes	Fraction of an Hour
SMP Media Outreach & Education	4 minutes	0.0667
SMP Group Outreach & Education	4 minutes	0.0667
SMP Individual Interaction	5 minutes	0.0833
SMP Team Member Activity	5 minutes	0.0833
SMP Interaction	5 minutes	0.0833
SMP Team Member	7 minutes	0.1166
SHIP Media Outreach & Education	4 minutes	0.0667
SHIP Group Outreach & Education	4 minutes	0.0667
SHIP Team Member	7 minutes	0.1166
SHIP Beneficiary Contact	5 minutes	0.0833
SHIP Training Form	6 minutes	0.10
SHIP Team Member Activity	7 minutes	0.1166

SHIP Training	4 minutes	0.0667
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Estimated Annualized Burden Hours

Grantee Respondent Type	Form/Report Name	No. of Respondents	No. of Responses per Respondent	Average Burden per Response (in Minutes)	Total Burden Hours
SMP	Media Outreach & Education	216	46	4	662.4
SMP	Group Outreach & Education	6,935	4	4	1,849.33
SMP	Individual Interaction	6,935	41	5	23,694.58
SMP	Team Member	216	31	5	558
SMP	SIRS Team Member Activity	216	31	5	558
SMP	SMP Interaction	6,935	2	5	1,155.83
*SMP	OIG Report	*0	0	0	0
*SMP	Time Spent Report	*0	0	0	0
SHIP/MIPPA	Media Outreach & Education	3,750	15	4	3,750
SHIP/MIPPA	Group Outreach & Education	3,750	15	4	3,750
SHIP/MIPPA	SHIP Team Member	216	75	5	1,350
SHIP/MIPPA	Beneficiary Contact	15,000	233	5	291,250
*SHIP/MIPPA	SHIP Performance Report	*0	0	0	0
*SHIP/MIPPA	Resource Report	*0	0	0	0
*SHIP/MIPPA	MIPPA Performance Report	*0	0	0	0
SHIP/MIPPA	SHIP Team Member Activity	216	40	7	1,008
*SHIP/SMP/MIPPA	Summary Reports	*0	0	0	0
*SHIP/MIPPA	Part D Enrollment Outcomes Report	*0	0	0	0
Totals		49,769	4,042,681		345,646.47

*This data collection activity is an automated task in the system and does not compute to an estimate of time for burden.

Estimated Annualized Respondent Costs

Grantee Respondent Type	Form/Report Name	Total Burden Hours	Hourly Wage	Total Respondent Costs
SMP	Media Outreach & Education	2,484	\$32.52	\$80,779.68
SMP	Group Outreach & Education	1,849.33	\$32.52	\$60,140.21
SMP	Individual Interaction	23,694.58	\$32.52	\$770,547.74
SMP	Team Member	558	\$32.52	\$18,146.16
SMP	SMP Team Member Activity	558	\$32.52	\$18,146.16
SMP	SMP Interaction	1,155.83	\$32.52	\$37,587.59
SMP	OIG Report	0	\$32.52	\$0.00
SMP	Time Spent Report	0	\$32.52	\$0.00
SHIP/MIPPA	Media Outreach & Education	14,062.50	\$32.52	\$457,312.50
SHIP/MIPPA	Group Outreach & Education	3,750	\$32.52	\$121,950.00
SHIP/MIPPA	SHIP Team Member	1,350	\$32.52	\$43,902.00
SHIP/MIPPA	Beneficiary Contact	291,250	\$32.52	\$9,471,450.00
SHIP/MIPPA	SHIP Performance Report	0	\$32.52	\$0.00
SHIP/MIPPA	Resource Report	0	\$32.52	\$0.00
SHIP/MIPPA	MIPPA Performance Report	0	\$32.52	\$0.00
SHIP/MIPPA	SHIP Team Member Activity	1,008	\$32.52	\$32,780.16
SHIP/MIPPA	SHIP Training	72	\$32.52	\$2,341.44
SHIP/SMP/MIPPA	Summary Reports	0	\$32.52	\$0.00
SHIP/MIPPA	Part D Enrollment Outcomes Report	0	\$32.52	\$0.00
Totals		347,301		\$11,635,024.14

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Questions 12 and 14.)

There are no additional costs to the projects beyond those already identified in Item 12 above.

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Questions 12, 13, and 14 in a single table.

The estimated annualized cost to the Federal Government is \$40,048.10. Salaries are based on OPMs most recent Pay Chart for Federal Employees plus an additional 100% accounting for overhead and benefits.

A GS-15 step 1 hourly rate of \$68.38 per hour⁴ for 10 hours totals \$683.80. Factoring in 100% to account for benefits and overhead totals \$1,367.60.

A GS-14 step 1 hourly rate of \$58.13 per hour⁵ for 100 hours totals \$5,813.00. Factoring in 100% to account for benefits and overhead totals \$11,626.00.

⁴ https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/20Tables/html/DCB_h.aspx

⁵ https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/20Tables/html/DCB_h.aspx

A GS-13 step 1 hourly rate of \$49.19 per hour⁶ for 275 hours totals \$13,527.25. Factoring in 100% to account for benefits and overhead totals \$27,054.50.

Estimated Cost Analysis per FTE				
Grade	Hours	Rate	Hourly Rate Total	Total Cost Including Overhead
GS 15	10	\$68.38	\$683.80	\$1,367.60
GS 14	100	\$58.13	\$5,813.00	\$11,626.00
GS 13	275	\$49.19	\$13,527.25	\$27,054.50
Total Fed Staff	385		\$20,024.05	\$40,048.10

15. Explain the reasons for any program changes or adjustments.

This is a revision request; ACL has modified several forms and combined several data elements due to the inclusion of the MIPPA and SMP programs. The addition of these programs have increased the previous time burden for this IC, however this combination has reduced the overall burden on respondents by reducing the need to track and report similar activities in separate systems eliminating the duplication action of accessing multiple systems. Taking into account previous collection year burden totals that have updated, there is a program change increase of annual burden increases from 215,288 burden hours to annual burden hours.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used.

ACL has two major reports that are distributed:

The first report is an annual Report to Congress on the SHIP program that aggregates that performance data for the individual SHIP grantees and the program nationally. This report also provides an overview of Medicare beneficiary issues and challenges as identified and reported by the SHIP grantees.

The second report is the OIG SMP Performance Report, which the OIG publishes annually providing the results of SMP performance data collection. Data collected is used for measuring and monitoring performance of the SMP projects and providing program results to the HHS budget office, the Congress, the SMP projects, and the public. The data are used in some instances by the media in reporting the activities of the SMP Projects.

No other publications are planned for this data.

17. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

Not applicable.

⁶ https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/20Tables/html/DCB_h.aspx

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18. If seeking approval not to display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

ACL will display an expiration date on the information collection instrument.