

January 14, 2009
Q&A on 0938-0952

OMB Question:

In supporting statement item 15, CMS notes that the substantial changes to burden arose from the use of “actual historical program claims data (collected from July 2005 to July 2008) as opposed to using estimates.” Can CMS explain why the initial estimates were so inaccurate? Does CMS think the new estimated number of responses is stable, or will it have large fluctuations over the next 3 years?

CMS Response:

The initially-reported burden for this form was grossly overestimated because, at the time of the original OMB submission, the Section 1011 program was a brand new program, for which CMS had no historical data on which to base the estimates. The estimates were made based on (1) feedback from the provider and provider advocacy communities on how many Section 1011 claims they felt they would submit; (2) the actual numbers of providers CMS expected to enroll in the Section 1011 program (which was, in turn, based on the number of each provider type that were enrolled in Medicare at the time); and (3) the number of “eligible” (i.e., generally, undocumented) aliens that live in the United States, as estimated by the U.S. Department of Homeland Security.

CMS anticipates the burden for this form will remain stable over the next three years.