

Information Collection 0938-0957
CMS form 10156
Crosswalk of Changes Made

NOTE: All Part numbers refer to part numbers in the revised collection instrument.

General Changes Made Throughout the Document

The following four changes are insignificant editorial changes made only for purposes of clarity. There is no additional or reduced burden associated with them.

- Required fields are designated with an asterisk (instead of not-required fields being designated “optional”).
- The term “organization” has been added, or substituted for other words such as “sponsor,” for purposes of clarity.
- When an Account Manager’s, Authorized Representative’s, Designee’s, or Actuary’s name is requested, they are given more explicit instructions to provide their first name, middle initial, and last name.
- When an Account Manager’s, Authorized Representative’s, Designee’s, or Actuary’s date of birth is requested, they are given more explicit instructions to provide the month, day and year.

The above changes neither increase nor decrease burden.

When an individual accesses the application, they must read and accept the User Agreement and Privacy Policy that appears. The text is found in Part 1.G. of the collection instrument. This feature is necessary so that users understand their rights and obligations associated with using the RDS Secure Web Site. The reading and accepting of this material is a standard practice of the Federal government. This feature nominally increases burden.

Specific Changes Made to the Document

Part I.B.

This section collects nominal information that the Account Manager must provide, in order to assign an Authorized Representative. This feature is necessary in order to collect necessary information from the Authorized Representative, and is supported by 42 CFR §423.884(c)(2)(viii). This feature nominally increases burden.

Part 1.C.

The feature in Part 1.C.(1) requires the Authorized Representative, when first registering to perform that role, to check a box confirming that the Account Manager that invited him to register is associated with the Plan Sponsor. This feature is necessary to verify participants in order to prevent unauthorized access to the Secure on-line application that is adapted from this collection instrument, and is supported by §1860D-22 of the Social Security Act, CMS' RDS implementing regulations at 42 C.F.R. §423 Subpart R, as well as the Debt Collection Improvement Act of 1996 at 31 U.S.C. §7701(c) and the Federal Privacy Act at 5 U.S.C. §552a. This feature nominally increases burden.

The feature in Part 1.C.(11) requires an Authorized Representative to provide his Login ID, password, and answers to security questions, to access the on-line application. This feature is necessary to verify participants in order to prevent unauthorized access to the Secure on-line application that is adapted from this collection instrument, and is supported by §1860D-22 of the Social Security Act, CMS' RDS implementing regulations at 42 C.F.R. §423 Subpart R, as well as the Debt Collection Improvement Act of 1996 at 31 U.S.C. §7701(c) and the Federal Privacy Act at 5 U.S.C. §552a. This feature nominally increases burden.

Part 1.D.

The feature in Part 1.D.(10) requires the Account Manager to provide his Login ID, password, and answers to security questions, to access the on-line application. This feature is necessary to verify participants in order to prevent unauthorized access to the Secure on-line application that is adapted from this collection instrument, and is supported by §1860D-22 of the Social Security Act, CMS' RDS implementing regulations at 42 C.F.R. §423 Subpart R, as well as the Debt Collection Improvement Act of 1996 at 31 U.S.C. §7701(c) and the Federal Privacy Act at 5 U.S.C. §552a. This feature nominally increases burden.

Part 1.E.

At the request of the Plan Sponsor community, Plan Sponsors are given the flexibility to assign Designees to perform different functions within the RDS application. To accommodate that request, this section collects nominal information that the Account Manager or Authorized Representative must provide, in order to assign a Designee. This change is necessary in order to collect necessary information from the Designee, and is supported by 42 CFR §423.884(c)(2)(viii). This feature nominally increases burden.

Part 1.F.

At the request of the Plan Sponsor community, Plan Sponsors are given the flexibility to assign Designees to perform different functions within the RDS application. To accommodate that request, the feature in Part 1.F.(11) requires a Designee to provide his Login ID, password, and answers to security questions, to access the on-line application. This feature is necessary to verify participants in order to prevent unauthorized access to

the Secure on-line application that is adapted from this collection instrument, and is supported by §1860D-22 of the Social Security Act, CMS' RDS implementing regulations at 42 C.F.R. §423 Subpart R, as well as the Debt Collection Improvement Act of 1996 at 31 U.S.C. §7701(c) and the Federal Privacy Act at 5 U.S.C. §552a. This feature nominally increases burden.

Part 1.G.

As discussed above, the text of the User Agreement and Privacy Policy appear in this Part, as discussed in the **General Changes** section of this paper.

Part II.A.

The question of whether the Plan Sponsor is combining two or more benefit options for purposes of the actuarial equivalence net test has been removed. (A revised version of this question is instead asked of the attesting Actuary, in Part III. A. of the collection instrument). The question had been asked of the Account Manager. But based on feedback from the Plan Sponsor community, we have learned that the attesting Actuary is the more appropriate individual to whom the question should be asked. This change neither increases nor decreases burden.

Part II.B.

Information to be provided about the attesting Actuary has been removed from this Part, and moved to Part II.C. This change neither increases nor decreases burden.

Part II.D.

A feature in Part II.D.(12) requires the attesting Actuary to provide his Login ID, password, and answers to security questions, to access the on-line application. This change is necessary to verify participants in order to prevent unauthorized access to the Secure on-line application that is adapted from this collection instrument, and is supported by §1860D-22 of the Social Security Act, CMS' RDS implementing regulations at 42 C.F.R. §423 Subpart R, as well as the Debt Collection Improvement Act of 1996 at 31 U.S.C. §7701(c) and the Federal Privacy Act at 5 U.S.C. §552a. This change nominally increases burden.

In response to requests from the The Actuary community, we will be permitting attesting Actuaries to also serve as Designees within a Plan Sponsor's application. In order to accommodate this request, a feature has been added in Part II.D.(4) and (5) that requires the attesting Actuary to provide his SSN, date of birth, and job title (as would any other Designee). This change is necessary to verify participants in order to prevent unauthorized access to the Secure on-line application that is adapted from this collection instrument, and is supported by §1860D-22 of the Social Security Act, CMS' RDS implementing regulations at 42 C.F.R. §423 Subpart R, as well as the Debt Collection Improvement Act of 1996 at 31 U.S.C. §7701(c) and the Federal Privacy Act at 5 U.S.C. §552a. This feature nominally increases burden.

Part III.A.

This question of whether the attesting Actuary is combining two or more benefit options for purposes of the actuarial equivalence net test is now asked of the attesting Actuary. It used to be asked of the Account Manager, in the previously approved version of the collection instrument. However, it has come to our attention that the attesting Actuary is the party who possesses the requisite knowledge to answer this question. The requirement to provide a response to this question is supported by 42 CFR §423.884(c)(2)(viii) and (d). This change neither increases nor decreases burden.

Part III.B.

The attesting Actuary makes one attestation that covers both the gross value and net value actuarial attestation tests. In the previously approved version of the collection instrument, the attesting Actuary was required to make two separate attestations. Some relatively insignificant verbiage in the attestations has been modified, for clarity. These changes have been made to streamline the attestation process, and are supported by 42 CFR §423.884(c)(2)(viii) and (d). This change neither increases nor decreases burden.

Parts IV. and V.

The only changes made to these two sections is the removal of the section name, as discussed in the **General Changes** section of this paper. This change neither increases nor decreases burden.

Part VI.A.

The Plan Sponsor community has requested that they be able to specify those parties that can submit retiree lists on their behalf. To accommodate this request, a feature in Part VI.A.(3) allows the Plan Sponsor to specify, by benefit option, the party that is permitted to submit retiree lists on behalf of the Plan Sponsor. A new feature in Part VI.A. (9) permits the Plan Sponsor to specify how it wishes to receive notification files, and gives Plan Sponsors the flexibility to receive them via HTTPS from the RDS Center, even if the Plan Sponsor submits its retiree list some other way. These changes are supported by 42 CFR §423.884(c)(2)(v). These changes nominally increase burden.

Part VI B

This section makes clear that the Plan Sponsor, for each retiree for whom it wishes to collect RDS, must provide that retiree's SSN and/or HICN. The previous collection instrument required the Plan Sponsor to provide both. This change is supported by 42 CFR §423.884(c)(2)(v)(B). This change nominally decreases burden.

Part VII and Part VIII

Minor editorial changes were made to these two parts of the collection instrument. These changes neither increase nor decrease burden.