

REASON FOR NO CHANGE IN BURDEN – Provided by CMS via email on 3/29/2011:

Our component explained that the reason the burden has not changed is twofold. First, prior to the MBES/CBES redesign, the MBES was operating on an outdated system that had been in place since 1998. Had the revisions been implemented to the old system, there would have been an increase in burden. We believe, however, that the impact in burden was negated since the MBES redesign and the additional/moved Lines occurred concurrently. The following bullets describe additional system updates that are an adjunct to the supporting statement.

- Data Requests – all reports are now batched and emailed to the user. Data requests are now generated through middleware that provides the user with the capability to enter data and continue to work in the system, while their reports are being generated. To work on the MBES in the prior system, users had to wait until their data request was finished processing.
- To expedite resolution of an error, all errors occurring in the system are logged and tracked using the Error Id number presented on the screen. System programmers our emailed errors as they occur. The prior system did not have this function.
- Excel/print functions on every form providing the user with the additional functionality to manipulate data/view data. The prior system would cut-off many of the columns when printed.
- Easily accessible and identifiable edit/browse/delete icons that simplifies form access providing users with fewer alert messages and fewer steps to achieve the same results. The prior system used radio buttons for each of the aforementioned functions. Users would oftentimes overlook the selection of one of these functions resulting in a pop-up window alerting them to select one of the aforementioned functions.
- The new system design is form-based and automatically displays all forms on the main menu for the selected state, submission date, Total Computable and Federal Share to provide the user with a visual view of the submission. To view this information under the old system, users had to perform additional tasks.
- More redundancy built-in to the system – multiple web servers – multiple database servers permits more concurrent users without impacting system's speed.
- Service Oriented Architecture (SOA) – WSDL operating on new system provides more flexibility and reduces implementation time of revisions/updates to the system.

Second, the following provides an overview of the changes made to the CMS-21Base; CMS-21; CMS-21P; CMS-21WAIV; CMS-21PWAIVER series of forms. The burden associated with the additional line items are mitigated by the changes made to the operating system described above.

- **Added Line:** Line 8A Drug Rebate
- **Added Line:** Line 25 Translation and Interpretation (FFP Rate 75%)
- **Moved Line:** Line 25B “Other Services” moved to Line 31 “Other Services”
- **Moved Line:** Line 26 “Outreach” moved to Line 32 “Outreach”
- **Moved Line:** Line 27 “Administration” moved to Line 33 “Administration”
- **Moved Line:** Line 28 “Balance” moved to Line 48 “Balance”
- **Moved Line:** Line 29 “Less: Collections” moved to Line 49 “Less: Collections”
- **Moved Line:** Line 30 “Total” moved to Line 50 “Total”
- **Added Line:** Line 32A Increased Outreach and Enrollment of Indians
- **Added Line:** Line 32B Increase Outreach and Enrollment of children through premium subsidies
- **Added Line:** Line 34 PERM Administration (FFP Rate 90%)
- **Added Line:** Line 35 Citizenship Verification Technology (CHIPRA) non-enterable header row
- **Added Line:** Line 35A CVT Development (FFP Rate 90%)
- **Added Line:** Line 35B CVT Operation (FFP Rate 75%)