

**Supporting Statement – Part B**  
**Methods for Assuring Access to Covered Medicaid Services**  
**Under 42 CFR 447.203 and 447.204**  
(CMS 10391, OMB 0938-NEW)

Collections of Information Employing Statistical Methods

1. Describe (including a numerical estimate) the potential respondent universe and any sampling or other respondent selection method to be used. Data on the number of entities (e.g., establishments, State and local government units, households, or persons) in the universe covered by the collection and in the corresponding sample are to be provided in tabular form for the universe as a whole and for each of the strata in the proposed sample. Indicate expected response rates for the collection as a whole. If the collection had been conducted previously, include the actual response rate achieved during the last collection.

CMS estimates that all 50 State governments will respond to this collection and submit 154 annual responses. We estimate that the requirements to review and make publically available, data trends and factors that measure: enrollee needs, availability of care and providers, utilization of services, and Medicaid rate comparisons under §447.203(b)(1) through (3) would affect all 50 State governments. We estimate that the requirement under §447.203(b)(3)(ii), to monitor access to care after reducing or restructuring rates, would affect all 22 State governments that implement a rate reduction or restructure payment rates. We estimate that the requirement under §447.203(b)(4) would affect all States that do not currently have a means of beneficiary feedback. Since we currently do not know which States have implemented these mechanisms, we are assuming in our estimate that all 50 State governments will need to develop new mechanisms. We estimate that the requirement under §447.203(b)(5) would affect all State governments that identify access issues. We are estimating that approximately 10 States will identify access issues and submit corrective action plans to CMS. This is a new requirement and we have no basis to determine how many States will identify access issues as they conduct the data reviews and monitoring activities.

Section 447.204 implements the statutory requirement specifying that Medicaid rates must be consistent with efficiency, economy, and quality and must also be sufficient to enlist enough providers so that services under the plan are available to beneficiaries at least to the extent that those services are available to the general population. We are estimating that approximately 22 States will implement these rate changes that would require a public process based on the number of States that proposed such reductions in FY 2010.

2. Describe the procedures for the collection of information including:

- Statistical methodology for stratification and sample selection,
- Estimation procedure,

- Degree of accuracy needed for the purpose described in the justification,
- Unusual problems requiring specialized sampling procedures, and
- Any use of periodic (less frequent than annual) data collection cycles to reduce burden.

The NPRM allows States the discretion to determine the collection procedures, including the statistical methodology, estimation procedures, degree of accuracy, etc.

3. Describe methods to maximize response rates and to deal with issues of non-response. The accuracy and reliability of information collected must be shown to be adequate for intended uses. For collections based on sampling, a special justification must be provided for any collection that will not yield 'reliable' data that can be generalized to the universe studied.

CMS Regional Offices will work with States to ensure that they have an appropriate timeline to address and complete the collection. Since the NPRM would implement a regulatory requirement, CMS may use compliance action to address non-responders.

4. Describe any tests of procedures or methods to be undertaken. Testing is encouraged as an effective means of refining collections of information to minimize burden and improve utility. Tests must be approved if they call for answers to identical questions from 10 or more respondents. A proposed test or set of tests may be submitted for approval separately or in combination with the main collection of information.

Under the NPRM, States would have the discretion to determine appropriate data measures and methods to remediate access issues, including tests of procedures or methods.

5. Provide the name and telephone number of individuals consulted on statistical aspects of the design and the name of the agency unit, contractor(s), grantee(s), or other person(s) who will actually collect and/or analyze the information for the agency.

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