

Supporting Statement – Part B
Early Retiree Reinsurance Program Survey

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.

The potential respondent universe is the number of plan sponsors that have received Early Retiree Reinsurance Program (ERRP) reimbursement for at least one employment-based plan. By the end of fiscal year 2014, we estimate there will be 3,475 such plan sponsors. There will be no sampling (i.e., we will direct every such plan sponsor, to respond to the survey).

We estimate that 1,737 of the universe of entities will be State and local government units, and 1,738 will be establishments.

We estimate an anticipated response rate, for the collection as a whole, of 90%. The collection has not been conducted previously.

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

- Statistical methodology for stratification and sample selection,

The survey is primarily related to how plan sponsors have used or will use the ERRP reimbursement they received. We intend to direct every plan sponsor that has received ERRP reimbursement, to complete the survey. Therefore, we will not be employing any statistical methodology for stratification and sample selection.

- Estimation procedure,

HHS will not derive any estimates or projections from the collection of information.

- Degree of accuracy needed for the purpose described in the justification,

Some of the questions in the survey ask what plan sponsors intend to do, or what they would have done, absent certain circumstances. It is impossible for sponsors to answer such questions 100% accurately, as they cannot know with certainty whether they will

actually do what they presently intend to do, or how they would have reacted in the absence of existing circumstances. However, we expect that most of plan sponsors' responses to these questions will ultimately prove to be accurate, and this degree of accuracy will be sufficient to serve the survey's purposes, which is primarily to assess how ERRP plan sponsors are using ERRP funds.

- Unusual problems requiring specialized sampling procedures

None

- Any use of periodic (less frequent than annual) data collection cycles to reduce burden.

We intend to direct plan sponsors that first received ERRP reimbursement in FY 2014, to respond to the survey only once. To reduce burden, sponsors that first received ERRP reimbursement before FY 2014, will be directed to respond to the survey only twice, and no more frequently than annually.

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.

We intend to maximize response rates by sending periodic reminders to plan sponsors that have not completed the survey.

As specified above, this collection is not based on sampling. Rather, every plan sponsor that has received ERRP reimbursement, will be directed to respond to the survey. CMS intends to address potential issues related to non-response by ensuring that all findings from the survey are reported with appropriate caveats, and will not extrapolate findings based on a subset of plan sponsors to the larger group.

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.

We intend to use the survey instrument itself as a test, by first directing a relatively small percentage of plan sponsors that have received ERRP reimbursement, to complete the survey. The

ERRP Program has a contact center that fields inquiries about the program. The instrument contains language that alerts sponsors that they can report any concerns to the contact center. After doing so, to the extent these plan sponsors give us reason to believe the survey instrument is overly burdensome, and/or to the extent we believe the responses to the survey questions demonstrate that we should revise the survey instrument to improve utility, we will revise the survey instrument accordingly. We would submit revisions to this PRA package that would include the revised survey instrument.

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.

As specified above, there are no statistical aspects of the design or sampling of this survey. The following contractor will collect and analyze the survey responses for CMS:

ViPS
One West Pennsylvania Avenue
Suite 700
Baltimore, MD 21204
410-832-8300

Project Director: Mr. Monty D'Ambrosio