

Crosswalk of Changes Between Existing Collection Instrument, and Revised Collection Instrument

NOTE: this Crosswalk covers the email that will link to the collection instrument, as well as the collection instrument itself. All question numbers refer to questions in the revised collection instrument submitted with this information collection request, unless otherwise specified.

Email that will link to the Collection Instrument

Plan sponsors that have not previously completed the prior version of the survey, will be sent an email that is almost identical to the email that was submitted as part of the information collection request for the discontinued version of the survey. The only substantive differences are as follows:

- The new version of the email will include the plan sponsor's prepopulated 10-digit application ID number, which the sponsor can cut and paste as the answer to the survey question that asks for this number.
- The new version of the email will ask plan sponsors to provide their response to the survey within 30 days, (However, as with the prior version of the survey, there is no obligation to respond).

Neither of these changes will materially add to, nor materially diminish, burden.

Plan sponsors that have previously completed the prior version of the survey, will be sent a version of the email that adds two short paragraphs. One that explains why they are being resurveyed, and one that explains the circumstance under which they should not retake the survey, and how they should respond to the email in such circumstances. The addition of these two paragraphs will add to burden only nominally.

Collection Instrument

Summary of changes:

In revising the survey, we propose to add one new question to the survey, and clarify the instructions to several questions. In addition, we have made several formatting changes to the survey to make it easier for sponsors to respond, to significantly reduce the number of ambiguous or nonsensical responses, and to significantly reduce the burden imposed on HHS for compiling and assembling data from the responses. Collectively, we do not believe these changes will materially add to, or materially diminish, the burden imposed on respondents.

The changes are more specifically set forth below:

Before Question 1, we have inserted a sentence suggesting that plan sponsors read the survey before completing it. We expect that inserting this sentence will nominally reduce burden, as the increase in burden of reading through the survey will lead to a slightly greater decrease in burden attributable to being familiar with the questions before attempting to answer them.

Question 2

We are instructing the sponsor to copy and paste the 10-digit application ID number from the accompanying email, into the answer space for this question. We believe this will slightly diminish burden.

Question 3

We are clarifying in the question that the response should reflect the number of plan participants in the applicable plan, as of the day you are completing this survey. This change has no impact on burden.

Question 4

We are clarifying in the question that the response should reflect the number of early retirees in the applicable plan, as of the day you are completing this survey, and also rephrasing the question for purposes of clarify. These changes have no impact on burden.

Question 5

We are clarifying that this question asks about ERRP funding received in calendar year 2010, and that in asking in which year they applied or intend to apply ERRP funds, we mean “spend”. We are also instructing sponsors to skip the question if they did not receive any ERRP reimbursement in CY 2010, and that adding up the responses to all plan years should total 100%. Most importantly, sponsors will be asked to select their responses from a drop-down box, rather than type in a numeric response. Collectively, we do not believe these changes will materially add to, or materially diminish, burden.

Question 6

With respect to this question about ERRP funds received in CY 2011, we are making the same clarification as in Question 5. Collectively, we do not believe these changes will materially add to, or materially diminish, burden.

Question 7

This question is new. It is similar to Questions 5 and Question 6, but asks about ERRP funding received in calendar year 2012. (Question 5 and Question 6 ask about ERRP funding received in

calendar year 2010 and 2011, respectively). We estimate this Question to increase burden by 1 hour, but expect that burden to be largely offset by the fact that many sponsors that respond to this question, will not be updating their responses to Questions 5 and/or 6.

Questions 9 and 10

Questions 8, 9, 10, 11 and 12 in the former version of the survey, have been collapsed into what are now Questions 9 and 10. Also, drop-down boxes with answers for sponsors to select, have replaced answer fields into which sponsors had entered numeric responses. Collectively, we do not believe these changes will materially add to, or materially diminish, burden.

Questions 11 and 12

Questions 13, 14, 15, 16 and 17 in the former version of the survey, have been collapsed into what are now Questions 11 and 12. Also, drop-down boxes with answers for sponsors to select, have replaced answer fields into which sponsors had entered numeric responses. Collectively, we do not believe these changes will materially add to, or materially diminish, burden.

Instructions for Questions 3 and 4

We have added part of the definition of “early retiree”. We do not believe that this will impact burden, as we believe sponsors will continue to consult the full regulatory definition of “early retiree”.

Instructions for Questions 5 and 6

We have clarified that this set of instructions also applies to new Question 7. We have also clarified what it means to have “received” ERRP funding in a given calendar year. We have also added instructions for how a sponsor should round its answers, and clarified that all the sponsor’s answers for each question should total 100. We do not believe this will impact burden.

Instructions for Question 9

Questions 8, 9, 10, and 11 of the expired version of the survey, have been collapsed into Question 9. Therefore, we collapsed the instructions for all those questions, into the instructions for question 9. We have also clarified that, for purposes of this survey, benefit-specific deductibles, such as a prescription drug deductible (as opposed to overall deductibles) are considered a type of “other out-of-pocket costs” referenced in Question 10.

Instructions for Question 11

Questions 13, 14, 15, 16 of the expired version of the survey, have been collapsed into Question 11. Therefore, we collapsed the instructions for all those questions, into the instructions for question 11. We have also clarified that, for purposes of this survey, benefit-specific deductibles, such as a prescription drug deductible (as opposed to overall deductibles) are considered a type of “other out-of-pocket costs” referenced in Question 12.