

**Justification for Non-Substantive Changes for Centenarian and MNUP Project
Development Worksheets:**

**Face-To-Face Interview; Telephone Interview;
20 CFR 416.204(b) and 422.135
OMB No. 0960-0780**

Background

In 2012, The Office of Inspector General (OIG) executed Audit No. A-08-09-19105 *Summary of Using Medicare Claim Data to Identify Deceased Beneficiaries*, which determined the Social Security Administration (SSA) could use enhanced Medicare claim data to better identify deceased beneficiaries using less time and fewer resources. SSA concurred and entered into Computer Matching Agreement (CMA) No. 1094 with the Center for Medicaid and Medicare Services (CMS) in July 2012, and secured funding through Interagency Agreement (IAA) No. 13-0006 in September 2012. This CMA and IAA support SSA's Medicare Non-utilization Project (MNUP). The MNUP reviews title II records of beneficiaries ages 90-99, in current pay, and residing within the 50 states and District of Columbia to determine if a beneficiary is still alive; decide if payee development is necessary; and alleviate incorrect payments. This exchange matches SSA's records against CMS' enrollment database and uses the non-utilization of Medicare benefits for an extended period and the absence of private insurance, health maintenance organization, or nursing home as an indicator that an individual may be deceased.

For beneficiaries resulting in a match, SSA will issue a call-in letter, proposing a date and time for an interview, and will ask the exact same questions currently on the Centenarian Worksheets. To streamline the MNUP implementation and meet the September 2013 deadline, we will use the Centenarian Worksheets for the MNUP and omit the term Centenarian from the title. This allows the form to encompass both audiences, age 100 and ages 90-99.

Why Change Occurs within a Year of OMB Approval

OMB approved the information collection request (ICR) for the Centenarian Project, OMB No. 0960-0780, on June 5, 2013. We were unable to submit the MNUP as part of our renewal ICR because SSA did not have executive approval or stakeholder backing on the MNUP start date. After assessing our stakeholder's needs and receiving their concurrence, we began project support efforts and received an official agency start date: first data exchange in August 2013 and beneficiary interviews in September 2013.

Even though we were unable to add the MNUP to our previously approved ICR, we mentioned potential expansion of the Centenarian Project as a way to strengthen our anti-fraud tools within the Addendum we submitted with the ICR OMB approved on June 5, 2013.

Timeframe for Request

Personnel cannot systematically collect project information and SSA cannot enhance management information concerning eligibility, improper payments, and capability for the elderly without OMB making these forms available by the agency approved start date of, **September 1, 2013**.

The sooner SSA can act on the data exchange results the sooner we can take action on records involving potential improper payments. The 2012 OIG Audit, No. A-08-09-19105, estimated SSA overpaid 890 deceased beneficiaries about \$99 million, and within the next year, SSA will likely pay about \$9 million in additional overpayments to deceased beneficiaries. We need to make these forms available for the MNUP purposes by September 2013 because the timely collection of information assists OIG prosecutions and limits damages to SSA. Delaying these changes until the next renewal period would prove detrimental to SSA.

Therefore, we ask OMB to approve this Change Request by **September 1, 2013**.

Revisions to the Collection

- **Change #1:** We are increasing the scope for this collection to include the MNUP title II population between the ages of 90 through 99.

Justification #1: As explained in the Background section above, we are increasing the scope of this collection, because the MNUP population will answer the same questions we already ask through the Centenarian Project. We are making no substantive changes to the questions we ask using the Centenarian worksheets as part of our interviews. Rather we will simply include this new population as part of the current interview process.

- **Change #2:** We are removing the word “Centenarian” from the Face-to-Face and Telephone Worksheets. We will eliminate Centenarian from the form title. In the body of the form, we will replace the term Centenarian with the term individual.

Justification #2: We will use the questions on these forms to collect and record information for individuals who obtain age 90 through 99 in addition to our Centenarians. Therefore, the previous term, “Centenarian,” is no longer accurate because we are expanding our audience. We will use the forms for both the Centenarian Project, individuals age 100 and over, and the MNUP, individuals ages 90 through 99 because the business processes are identical.

Burden Information

SSA will conduct the two projects (Centenarian Project and MNUP) simultaneously, and as previously stated in the Supporting Statement for the current Centenarian Project, we will contact each individual only once.

As per our previous information collection request, we estimate we will contact

approximately 22,000 centenarians annually as part of the Centenarian Project. In addition, we estimate we will contact approximately 20,000 respondents as part of the new MNUP interviews. The following chart shows the updated burden for this collection:

Modality of Collection	Number of Respondents	Frequency of Response	Average Burden Per Response (minutes)	Estimated Total Annual Burden (hours)
Centenarian Project	22,000	1	15	5,500
MNUP	20,000	1	15	5,000
Totals	42,000			10,500

Future Revisions to the Collection

We are considering re-contacting the beneficiaries after we perform either a Centenarian Project or and MNUP interview, but we will not assess our plan of action until 2015. If this decision becomes final, we will notify OMB of this change and any other revisions to our business process.