Crosswalk of Changes between 30-Day ICR and Final ICR (CMS-10261)

Reporting Section/Item	Change	Reason for Change	Effect on reporting burden
Grievances	Increased number of data elements from 18 to 22. However, now report at the contract level instead of the plan benefit package level. The estimated change in burden is none, because we believe the increase in data elements is cancelled out by the change from reporting at the plan level to the contract level.	Lessons Learned	None
Employer Group Sponsors	One data element, "Employer Plan Year Start Date," is being removed. This data element was seldom used. Two data elements are being added: "Is this a calendar year plan?" and "If no, provide the non- calendar year start date." This change is not expected to impact resources even though a data element is added. The reason is that the addition of the new data element will be balanced by the reduction in resources resulting from this reporting section now being consistent with Part D reporting.	Lessons Learned	None

The table below outlines specific proposed changes to the 30 day ICR.

Summary: Compared to the NOTICE OF OFFICE OF MANAGEMENT AND BUDGET ACTION posted on 10/4/2013 (for 30-day comment period), this ICR shows Decrease of 5,227 in hours burden and a decrease of \$337,486 in cost burden.