

**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 2013, SSA executed the Medicare Non-utilization Project (MNUP), which used Computer Matching Agreement (CMA) No. 1094 with the Centers for Medicare and Medicaid Services (CMS) and Interagency Agreement (IAA) No. 13-0006. The MNUP reviewed Title II records of beneficiaries ages 90-99, in current pay, and residing within the 50 states and District of Columbia, to: (1) determine if a beneficiary is still alive; (2) decide if payee development is necessary; and (3) alleviate incorrect payments. This exchange matched SSA's records against CMS' enrollment database and used 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 used a call-in letter, proposing a date and time for an interview, and asked the exact same questions found on the Centenarian Worksheets. Consequently, when we increased the scope of the worksheets to include the MNUP we removed the word Centenarian to accommodate the dual purpose. When we submitted our Change Request to increase the scope of this information collection to include MNUP, we included our future plans, which anticipated merging the workloads because of their close kinship. At that time, we stated we would notify OMB upon further assessment when we are ready to merge the workloads.

In April 2014, SSA renewed CMA No. 1094 and modified the age criterion to ages 90 and above. This created an overlap with the Title II Centenarian Project. Consequently, we are now requesting to eliminate the Title II Centenarian Project and replace it with the MNUP. The Title XVI only Centenarian Project is still in place as we are not ready to phase it out; however, we intend to implement the Title II MNUP for ages 90 and above in **September 2014**.

Why Change Occurs within a Year of OMB Approval

OMB approved the non-substantive change request to include MNUP in the information collection, OMB No. 0960-0780, on August 27, 2013. We could not announce the elimination of the Title II Centenarian during our change request because SSA did not have executive approval or a signed MNUP agreement reflecting the age modification. After receiving executive approval and stakeholder concurrence, we engaged CMS in the renewal of CMA No. 1094 for beneficiaries ages 90 and above. The Deputy Commissioner for Operations signed the CMA No. 1094 renewal for ages 90 and above on April 24, 2014.

Since we knew we would eventually introduce the MNUP expansion and Title II Centenarian elimination as soon as possible, we mentioned these changes to both projects within the August 2013 Change Request as a way to strengthen our anti-fraud tools within the section *Future Revisions to the Collection*.

Timeframe for Request

Since we previously informed OMB of these changes, we implemented a Title XVI only Centenarian Project effective May 12, 2014, and will implement the MNUP for ages 90 and above in **September 2014**.

Revisions to the Collection

- **Change #1:** We are changing the scope for this collection to integrate the MNUP Title II population with the Title Centenarian population for ages 90 and above.

Justification #1: As explained in the Background section above, we are changing the scope of this collection because the new MNUP population will overlap the Title II Centenarian Project. We are making no changes to the questions we ask. Rather we will simply shift the newly acquired Title II Centenarian population into the MNUP workload.

- **Change #2:** We are conducting a Title XVI only Centenarian Project. This drastically decreases the number of interviews for the Centenarian Project.

Justification #2: As explained in the Background section above, the MNUP is a Title II only workload so there is only a population overlap for Title II beneficiaries. However, the agency still requires a Title XVI program integrity and fraud identification tool. We are conducting the Centenarian Project as Title XVI only in 2014 for the aforementioned reasons.

Burden Information

SSA will continue conducting the two projects (Centenarian Project and MNUP) simultaneously in 2014 and we will contact each individual only once.

In our previous information collection request, we estimated we would contact approximately 22,000 centenarians annually as part of the Centenarian Project. This was an accurate projection when the workload encompassed both Title II and Title XVI contacts. In practice, we found this estimate decreased in 2014 because the workload shifted to Title XVI only.

As explained in the Background section, the MNUP is a data exchange contingent upon positive matches for prescribed search criteria. Prior to the August 2013 exchange, we estimated 20,000 respondents. In practice, the exchange uncovered approximately 15,000 respondents. 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 – Title XVI Only	1,000	1	15	250

MNUP – All Title II Responses	15,000	1	15	3,750
Totals	16,000			4,000

Future Plans

Eventually we want to eliminate the Centenarian Project completely. We hoped to do so in 2014; however, due to time constraints and the level of effort, we could not bring this to fruition. We are currently performing the necessary legwork to cease generating new Centenarian Project listings.

Effective 2015

The Centenarian Project will only exist in the form of rollover (RO) cases. RO cases are individuals selected from prior years but unsuccessfully contacted so their records are in suspense status. We make every attempt to resolve if the beneficiary is alive or deceased.

The MNUP remains our Title II program integrity initiative for ages 90 and above.

All Title XVI program integrity for the elderly remains in the Limited Issue (LI) and Redetermination workloads. SSA currently generates LIs that select records exhibiting specific criteria. We will implement a new LI that identifies SSI recipients age 100 with no Supplemental Security Record activity for three or more years. We will ask the recipients the same questions used in the MNUP and Title XVI only Centenarian Project.