Supporting Statement – Part A

State Health Insurance Assistance Program (SHIP) Client Contact Form, Public and Media Activity Report Form, and Resource Report Form (CMS-10028)
0938-0850

Specific Instructions

A. Background

The State Health Insurance Assistance Program (SHIP), created under Section 4360 of the Omnibus Budget Reconciliation Act (OBRA) of 1990 (P. L. 101-508) (42 USC 1395b-4, attached), authorizes the Secretary of the Department of Health and Human Services (DHHS) to make grants to states to establish and maintain health insurance advisory services programs for Medicare beneficiaries. The purpose of the program is to develop and strengthen the capability of states to provide beneficiaries with information, counseling and assistance on adequate and appropriate health insurance coverage.

Grant funds are awarded by the Centers for Medicare & Medicaid Services (CMS) to states to provide information, counseling and assistance to beneficiaries relating to Medicare and Medicaid matters as well as Medicare supplement policies, managed care options including Medicare Advantage, long-term care insurance, and other health insurance benefit information. States may carry out the objective of the grants by providing one-on-one counseling, either face-to-face or over the telephone, by trained paid and volunteer staff, by distributing written informational materials, or by holding group educational seminars and presentations and outreach events.

The enabling legislation initially authorized up to $10 million in annual appropriations for the grants for fiscal years 1991, 1992, and 1993. While no funds were appropriated for fiscal 1991, $10 million or more was awarded in SHIP grants annually from fiscal years 1992 to 2001. In fiscal years 2002 and 2003, SHIPs received $12.5 million in funding. In fiscal year 2004 funding was increased to $21.5 million. Funding from CMS' annual appropriation (Program Management Account) increased over the next four years from $31.7 million in fiscal year 2005 to $45 million in fiscal year 2009. In fiscal year 2012, SHIPs received $50 million in funding.

Increased funding supported activities related to the outreach and education requirements of the Balanced Budget Act of 1997 (BBA), the requirements of the Medicare Modernization Act of 2003 (MMA), the requirements of the Medicare Improvements for Patients and Providers Act of 2008 (MIPPA) and requirements of the Patient Protective and Affordable Care Act of 2010 (ACA). Activities included those related to the Part D

Prescription Drug Program, Medicare Advantage, and the Low-Income Subsidy and Medicare Savings Programs (LIS/MSP). CMS remains committed to supporting this program in future periods.

The current Client Contact Form, Public and Media Activity Report Form, and Resource Report Form have been used to collect data to evaluate program effectiveness and improvement. The 2007-2009 SHIP Performance Assessment Workgroup (comprised of SHIP Directors and representatives from external organizations such as the Administration on Aging), in a report to CMS in September 2009, recommended that changes be made to the forms in order to enhance the ability to measure performance and program evaluation for each SHIP; add additional data collection elements as requested by Congress and SHIPs (Limited English Proficiency and Dual Mentally Disabled); and reduce the burden of data submission by counselors as a result of the ability to pre-populate certain data cells. All recommended changes were captured in the last OMB submission package. These forms were approved by OMB effective through July 31, 2013. In this submission, no changes will be made to these forms.

In April 2011, the Medicare-Medicaid Coordination Office awarded design contracts to 15 states to implement State Demonstrations to Integrate Care for Medicare-Medicaid Individuals (Dual eligible). The overall goal of this initiative is to develop, test and validate fully integrated delivery system and care coordination models. The Financial Alignment Initiative is a unique Federal-state partnership to test aligning the service delivery and financing of the Medicare and Medicaid programs to better serve Medicare-Medicaid individuals. As part of this effort, there is a need for strong beneficiary support, education and outreach in each State that is implementing a Financial Alignment model, including options counseling for beneficiaries. State Health Insurance Assistance Programs (SHIPs) and Aging and Disability Resource Centers (ADRCs) have longstanding history and relationships with beneficiaries and are well situated to provide this service locally in each State.

A key component of this initiative will be tracking and reporting on the types of questions being asked and the type of information and assistance SHIPs/ADRCs are providing to these dually eligible beneficiaries. This information will be reported through the SHIP National Performance Reporting System and shared with the Medicare-Medicaid Coordination Office on a quarterly basis to ensure services to dual eligibles are within the scope of the cooperative agreement requirements and support the Financial Alignment models.

B. Justification

1. Need and Legal Basis

Section 4360(f) of OBRA 1990 requires the Secretary to provide a series of reports to the

U.S. Congress on the performance of the program and its impact on beneficiaries and to obtain important informational feedback from beneficiaries. Further, in response to requirements of the Balanced Budget Act of 1997, CMS launched a comprehensive five-year campaign, the National Medicare Education Program (NMEP), to raise awareness among beneficiaries about their Medicare health plan options and help them assess the advantages and disadvantages each choice holds for them. The Medicare Modernization Act (MMA) of 2003 required SHIPs to be actively engaged in the implementation of the Medicare Prescription Drug Program (Part D). MIPPA legislation and Affordable Care Act legislation required SHIPs to provide enrollment assistance for the Limited Income Subsidy (LIS) and Medicare Savings Program (MSP). The goal is to ensure that beneficiaries are making an informed choice, regardless of whether they stay in Original Medicare or choose new options. CMS is responsible to Congress for demonstrating improvement over time in the level of awareness and understanding beneficiaries have about health plan options. The SHIPs are an integral component of this initiative.

2. Information Users

The information collected is used to fulfill the reporting requirements described in Section 4360(f) of OBRA 1990. CMS will utilize this data. The data will be accumulated and analyzed to measure SHIP performance in order to determine whether and to what extent the SHIPs have met the goals of improved CMS customer service to beneficiaries and better understanding by beneficiaries of their health insurance options. Further, the information will be used in the administration of the grants, to measure performance and appropriate use of the funds by the state grantees, to identify gaps in services and technical support needed by SHIPs, and to identify and share best practices.

3. Use of Information Technology

While the forms are completed manually by many individual SHIPS paid and volunteer counselors, virtually all of the states use an automated or electronic data transfer technology to accumulate the data and transmit it to CMS. In order to minimize the burden, CSM has created an internet-based data collection tool for entry of the accumulated data by the state grantees. The forms are relatively simple to use, in an electronic fill-in format. No signatures are required for these forms. 20 additional SUFs will be added to the electronic format of the CC and PAM.

4. Duplication of Efforts

The data to be collected from the SHIP grantees are unique to this grant program and are based significantly on the legislatively mandated reporting requirements. The data is being gathered from and applies only to these federally mandated grant programs.

5. Small Businesses

This information collection will not impact any small entities.

6. Less Frequent Collection

This information collection is necessary to enable fulfillment of the Congressional reporting requirements in Section 4360 of OBRA 1990. There are three forms required as part of this data collection, a Client Contact Form, a Public and Media Activity Report Form, and a Resource Report Form. When the grants were first issued, quarterly reporting by the grantees was required. Although not in any specific required format, those reports summarized program activities for the period as well as reported financial status information. The reporting burden was reduced to semi-annually during an interim period, but with the implementation of the Medicare Modernization Act of 2003, the reporting requirement was returned to quarterly, effective July 1, 2005, so that CMS could have real time data available in order to assess the work of SHIPs, respond to beneficiary needs, and for reporting to Congress on the activities required under MMA.

The frequency in reporting for the Client Contact Form and the Public and Media Activity Report Form is quarterly, and for the Resource Report Form, is annually. The move to annual from semi-annual submission of the Resource Report Form represented a change in reporting frequency.

7. Special Circumstances

There are no special circumstances.

8. Federal Register/Outside Consultation

The 60-day Federal Register notice published on [OSORA/PRA will insert the date].

9. Payments/Gifts to Respondents

Respondents are primarily volunteers working for recipients of grants from CMS. The terms and conditions of the grants require collection of this information. No specific funds are being paid to respondents for furnishing this information.

10. Confidentiality

The information collected will be held private to the extent provided by law. The SHIPs are required as a condition of the grant to maintain appropriate security measures to assure the privacy of individuals that receive SHIP services. None of the personally identifying information will be passed beyond the state program, *i.e.*, no personally identifying information will be forwarded to CMS for analysis. Any results of the information collection will be made public in aggregate statistical form only.

11. Sensitive Questions

The information to be collected includes beneficiary zip code, age, income, gender, disability, and ethnicity/race. This information is necessary to evaluate whether a SHIP is adequately making its services available to populations that are hard-to- reach and underserved due to language, literacy, location and culture. This information will be aggregated at the state level and will not be identified or associated with any individuals.

12. Burden Estimates (Hours & Wages)

A respondent be a counselor, coordinator, or data entry specialist that is employed by the SHIP. The estimated hourly total compensation rate is $29.02920 per hour. CMS estimates the respondent burden hours to complete the Client Contact Form is 0.0833 (5 minutes) per submission. CMS estimates the respondent burden hours to complete the Public and Media Activity Report Form is 0.0833 (5 minutes) per submission. (Note: We did multiple time trials entering forms from a paper stack and entering directly into the web form. We tested with naïve and experienced users. And we tested records for new clients' vs. existing clients. On average, both the Client Contact Form and Public and Media Activity Report Form were entered in under 5 minutes (which we rounded up to 5 minutes). CMS estimates the respondent burden hours to prepare and complete the Resource Report Form is 2 hours per submission. These estimates are based on an internal assessment of the materials and feedback from the end users' evaluations.

The total annual hours requested is calculated as follows:

Table 1
Summary of Hours Burden by Type of Forms
(Estimates for CY2013)

In total, CMS estimates that it will receive 2,346,465 responses. This would amount to 195,642.25 total annual hours.

Responses	Client Contact Form	Public and Media Activity Report Form	Resource Report Form	Summary
Expected Responses	2,269,848.00	76,563.00	54	2,346,465.00
Overall Hours Per submission	0.083333	0.0833333	2	NA
Annual Burden Hours	189,154.00	6,380.25	108	195,642.25

Table 2
Total Cost Burden by Forms
(Estimates for CY2013)

The estimated wage burden for the all three forms (Client Contact, Public and Media Activity Report and Resource Report) is $5,679,338.00. The wage burden is based on an estimated total compensation rate of $29.02920* per hour.

Responses	Client Contact Form	Public and Media Activity Report Form	Resource Report Form	Total
Annual Burden Hours	189,154.00	6,380.250	108	195,642.25
Hourly Compensation	$29.02920	$29.02920	$29.02920	$29.02920
Total Cost Burden	$5,490,989.30	$185,213.55	$3,135.15	$5,679,338.00

* Source of value of volunteer time = Independent Sector. http://www.independentsector.org/volunteer_time. The estimated dollar value of volunteer time for 2011 is $21.79 per hour. The value of volunteer time is based on the average hourly earnings of all production and nonsupervisory workers on private nonfarm payrolls (as determined by the Bureau of Labor Statistics).

Independent Sector takes this figure and increases it by 12 percent to estimate for fringe benefits. For SHIPs, 25.8% of all counselors, coordinators, and other staff hours were volunteer hours for a 12 month period ending 31 Mar 2011. The remaining 74.2% of hours were SHIP-Paid or In-Kind paid at an average hourly wage of $20.76 plus fringe of 44.61% = $30.02 total compensation per hours. Combining volunteer and paid hour's rates yields a weighted total compensation rate of $27.90 per hour. Projected to 2013, the estimated hourly total compensation rate is $29.02920 per hour.

Table 3
Summary of Burden Hours Comparison CY2011 to CY2013

The overall estimated burden hours will increase by 7,667 (CY2011 Burden hours - CY2013 Burden hours). The overall number of expected respondents will increase by 444. The expected number of responses will increase by 91,107. These increases are based on projected future service growth and projected future increases in staffing to accommodate the increased service demand.

	CY2011 Number of Respondents	CY2011 Number of Responses	CY2011 Annual Burden Hours	CY2011 Annual Burden Dollars	CY 2013 Number of Respondents	CY2013 Number of Responses	CY2013 Annual Burden Hours	CY2013 Annual Burden Dollars
Client Contact Form	10,991	2,181,714	181,737	$5,070,462	11,435.00	2,269,848	189,154.00	$5,490,989.30
Public and Media Form	6,102	73,590	6,130	$171,027	6,349.00	76,563.00	6,380.25	$185,213.55
Resource Report Form	54	54	108	$3,013	54.00	54.00	108.0000	$3,135.15
Total	**17,147**	**2,255,358**	**187,975**	**$5,244,502**	**17,838**	**2,346,465.00**	**195,642.25**	**$5,679,338.00**

*Please note that we are using the 2011 data because the 2012 data is still being collected.
**Also note that the number of respondents is not summed across the three forms since the same individuals can complete all three forms.

Most of the data being requested in this instrument, under the mandate in Section 4360 of OBRA 1990, is information that any prudent manager of a public sector program would normally collect and publish in the course of managing the program. In fact, most of the programs are or will be required by their own State leaders to provide information similar to that being solicited by the instrument. This instrument is designed to combine with any state level information collection in order to simultaneously fulfill any existing or anticipated state level reporting requirements.

CMS and its National Performance Reporting (NPR) System contractor are currently working with several SHIPs on their state proprietary systems so that they can meet the specifications for NPR reporting. These states do however have the option to submit data directly into the internet-based data system. Any training or other preparation, or resources needed, will be provided through SHIP grant funds.

These forms will be completed, primarily, by volunteers at no actual cost.

13. Capital Costs

No capital or operational costs.

14. Cost to Federal Government

Costs to the Federal Government include contractor time for development of the performance measurement process for the SHIPs, and for maintenance of a database to facilitate accumulation, analysis and feedback of the data. The total future cost is estimated at $453,045 per year.

15. Changes to Burden

Overall Burden hours and expected number of respondents (Increase in burden):
The overall burden of hours and expected number of respondents increase is based on projected future service growth and projected future increases in staffing to accommodate the increased demand to utilize the SHIP network to raise awareness about new CMS policies and /or outreach initiatives.

Time to complete all forms (No Increase in burden):
The time estimate to complete each Client Contact Form, Public and Media Activity Report Form, and Resource Report Form all remain unchanged since the last OMB submission. Based on testing conducted in the course of development of these information collection forms, it is estimated that it takes a respondent about 5 minutes to complete the Client Contact Form and 5 minutes to complete the Public and Media Activity Report Form. Based on direct communication with State SHIP Directors, it takes a respondent a median of 120 minutes to complete the Resource Report Form. There are approximately 2,269,848 client contacts per year, approximately 76,563 public and media events per year, and 54 state-level resource reports per year.

Process for submitting forms (No Increase in burden):
The process for filling out the forms is now totally automated and SHIPs are expected to file the forms electronically through the SHIP web site http://www.shiptalk.org. All SHIPs have access to this web site. There is no further burden or obligation beyond filling out each form on-line. For some SHIPs with State level electronic data collection systems, arrangements have been made to directly upload the necessary data to http://www.shiptalk.org. No further burden is required in this case either.

16. Publication/Tabulation Dates

Data collection:	Quarterly for Client Contact Form and Public and Media Activity Report Form; annually for Resource Report Form. The SHIP grant year is April 1-March 31.
Data processing:	Quarterly
Data Analysis:	Quarterly and annually
Report preparation:	Quarterly and annually

17. Expiration Date

Displaying the expiration date is not problematic.

18. Certification Statement

N/A