

Cooperative Agreements to Support Establishment of State-Operated Health Insurance Exchanges (CMS-10371)

Appendix A - Summary of comments

1. Comment: CMS continues to underestimate the number of states associated with receiving funding under the Cooperative Agreement for State-Operated Exchanges. Furthermore, supporting information specifies 49 states and the District of Columbia that are eligible for an Establishment grant. However, burden estimates are only applicable to 29 states. Burden is, therefore, underestimated across the board.

Attorney burden is accounted for but appears to be duplicative in many areas of the supporting documentation. Please be advised that the public, state, and private agencies are inundated with burden associated with the ACA.

Response: Because funds are no longer available for Establishment grants, states are no longer eligible to apply for further funding. The majority of the grants will expire during calendar year 2015 with some being awarded an extension of their period of performance into 2016 and for two of the grants, 2017. As a result, numbers of respondents contained in the supporting statement burden tables are based on weighted averages of the expected responses for the three-year period of the request.

The attorney burden is carefully considered in each of the activities, based upon our current experience with the states. States request and are provided funds under the grant program to support staffing needs.

2. Comment: Please explain and provide the documents related to the February 9, 2012 Revision Memo approved by OMB that cites the non-substantive change to combine the System Development Lifecycle (SDLC) Reviews. This document is mentioned but not provided giving no transparency to the States.

Response: This comment is outside the scope of the 60-day Supporting Statement under review, which does not mention the February 9, 2012 Revision Memo. The Revision memo, however, is referenced in an earlier Emergency PRA package, approved by OMB on November 17, 2014 (OMB Control Number 0938-1119). The requested document is referenced in a previously approved PRA package from November 2014 (OMB Control Number 0938-1119). The requested revision memo can be found at:

<http://www.reginfo.gov/public/do/DownloadDocument?documentID=312126&version=0>.