

**Potential OMB Question:** Please explain why the burden hours increased in this package. The burden for 2017 was 1,150 and the 2018 estimate is 1,875

**CMMI Response:**

There are two main reasons the 2018 burden estimate is higher than 2017. First, the LAN expects to engage in fielding a joint survey with America's Health Insurance Plans (AHIP) rather than separate surveys and combining data points collected by AHIP. As such, the estimate reflects the additional plans from AHIP participating in the joint survey. The combined participation between the two organizations is approximately 75 entities (health plans and states). Second, the 2018 survey includes 5 additional "informational questions" (non-quantitative). The LAN estimates completion of these questions will result in no more than 2 additional hours to the 23-hour quantitative health plan burden, resulting in 25 total hours. BCBSA will continue to conduct its own survey and provide data points collected to the LAN for aggregation. Both surveys will be aggregated and reported through the LAN.