

Supporting Statement – Part A

Cooperative Agreement to Support Navigators in Federally-facilitated and State Partnership Marketplaces

A. Background

On March 23, 2010, the President signed into law the Patient Protection and Affordable Care Act. On March 30, 2010, the Health Care and Education Reconciliation Act of 2010 was also signed into law. The two laws collectively are referred to as the Affordable Care Act.

The Affordable Care Act Health Insurance Marketplace or “Marketplace” – also known as the Affordable Insurance Exchange – in each state, that together provides millions of Americans and small employers with access to affordable health insurance coverage. Consumers who access health insurance coverage through the Marketplaces will be able to receive direct assistance from Navigators authorized to help consumers through the registration, eligibility determination, and plan selection process as they enroll in coverage through the Marketplace.

Section 1311(i) of the Affordable Care requires Marketplaces to establish a Navigator grant program under which it awards grants to eligible individuals and entities (as described in Section 1311(i)(2) of the Affordable Care Act and 45 C.F.R. § 155.210(a) and (c)) applying to serve consumers in States with an FFM or State Partnership Marketplace. Navigators assist consumers by providing education about and facilitating selection of qualified health plans (QHPs) within the Marketplaces, as well as other required duties. For the Federally-facilitated Marketplace (FFM) and State Partnership Marketplaces (SPMs), CMS awards these cooperative agreements.

In April 2013, HHS released a funding opportunity to support Navigator activities in FFM and State Partnership Marketplace states, *PPHF-2013-Cooperative Agreement to Support Navigators in Federally-facilitated and State Partnership Exchanges*, number CA-NAV-13-001. As a result of this funding opportunity, on August 15, 2013, HHS awarded approximately \$67 million to 105 Navigator grant applicants in FFM and State Partnership Marketplace states. In June 2014, HHS released a second funding opportunity to support Navigator activities in FFM and State Partnership Marketplace states, *Cooperative Agreement to Support Navigators in Federally-facilitated and State Partnership Marketplaces*, number CA-NAV-14-002. As a result of this funding opportunity, on September 16, 2014, HHS awarded approximately \$60 million to 92 Navigator grant applicants in FFM and State Partnership Marketplace states. Navigator grantees are serving as in-person resources in their communities for consumers needing additional assistance shopping for and enrolling in health insurance coverage through Marketplaces. Entities and individuals cannot serve as federally certified Navigators without receiving federal grant funding to perform Navigator duties. The federal Navigator grants awarded in 2014 were for a performance period of one year and expire on September 15, 2015. As the Navigator program enters its third year, the project period under the 2015 funding opportunity will change from 12 months to 36 months, funded in 12-month increments known as budget periods.

Under these cooperative agreements, Navigator awardees are required to carry out all duties required by HHS regulations 45 C.F.R. §§ 155.210 and 155.215 to assist consumers and employees seeking health coverage in FFMs or SPMs. The required duties established through these regulations include, but are not limited to:

- Conducting public education activities to raise awareness about the Marketplace;
- Maintaining a physical presence in the Marketplace service area;

- Facilitating selection of a QHP;
- Providing information in a manner that is culturally and linguistically appropriate to the population served by the Marketplace, including individuals with limited English proficiency and that is accessible to individuals with disabilities;
- Complying with applicable training and conflict of interest standards; and
- Obtaining the authorization of applicants for coverage available through the Marketplace prior to accessing their personally identifiable information.

Additionally, these regulations place certain prohibitions on Navigators. These include, but are not limited to:

- Charging any applicant for or enrollee in coverage available through the Marketplace for application or other assistance related to Navigator duties;
- Compensating individual Navigators on a per-application, per-individual-assisted, or per-enrollment basis;
- Providing certain kinds of gifts to any applicant or potential enrollee in connection with or as an inducement for enrollment;
- Using Marketplace funds to purchase gifts or gift cards, or promotional items that market or promote the products or services of a third party that would be provided to any applicant for or potential enrollee in coverage available through the Marketplace;
- Soliciting any consumer for application or enrollment assistance by going door-to-door or through other unsolicited means of direct contact except in cases where the individual has a pre-existing relationship with the individual Navigator or Navigator entity; and
- Initiating any telephone call to a consumer using an automatic telephone dialing system or an artificial or prerecorded voice, except in cases where the individual Navigator or Navigator entity has a relationship with the consumer

Under the grant awards, Navigator awardees must agree to cooperate with any Federal evaluation of the program and must provide required weekly, monthly, quarterly, and final (at the end of the 36-month cooperative agreement period) progress reports, as well as quarterly financial reports to CMS.¹ Navigators will submit all required reports to CMS electronically via a format provided to awardees by CMS. Due dates for these progress reports will be provided to grant recipients in the terms and conditions that accompany each awardees' Notice of Award.

Each awardee must submit quarterly financial reports of cash transactions to CMS within 30 days after the end of each quarter via the Federal Payment Management System (PMS). A final report on expenditures and any program income generated will be submitted by Navigator awardees on a hard-copy Federal Financial Report (FFR or Standard Form 425) within 90 days of the budget/project period end date.²

In addition to adhering to the reporting requirements under the Navigator cooperative agreement, this information collection request includes making any updates or corrections regarding Assister organization information, involving Navigator and Enrollment Assister Program (EAP) organizations, submitted to CMS.

B. Justification

1. Need and Legal Basis

¹ 45 C.F.R. § 74.51; 45 C.F.R. § 92.40.

² 45 C.F.R. § 74.51; 45 C.F.R. § 92.41.

The establishment of Navigator Programs to provide education and outreach to consumers about health insurance exchanges and to provide culturally and linguistically appropriate information in a fair, accurate, and impartial manner among consumers is authorized by Sections 1311(d)(4)(K) and 1311(i) of the Affordable Care Act.

Section 1321(c)(1) of the Affordable Care Act authorizes the Secretary of HHS to “establish and operate” a federal Marketplace within any State that does not elect or is not prepared to establish a State-based Marketplace, as well as to “take such actions as are necessary to implement” the requirements for establishing a Marketplace, including the awarding of Navigator grants.

A regulation implementing Affordable Care Act Section 1311(i), 45 C.F.R. § 155.210, requires that at least two types of entities serve as Navigators in each Marketplace, and that at least one Navigator be a community and consumer-focused nonprofit. This regulation also requires that entities or individuals serving as Marketplace Navigators must have expertise in eligibility and enrollment rules and procedures; the range of qualified health plan options and insurance affordability programs; the needs of underserved and vulnerable populations; and Marketplace privacy and security standards.

2. Information Users

Under the terms of the Navigator grant program,³ Navigator awardees must provide progress reports on a weekly, monthly, and quarterly basis during the 36 month period of performance, and a final report at the end of the period. Progress reports will outline activities such as:

- How grant funds were used;
- Details of measureable outcomes;
- The program’s progress;
- Descriptions of any barriers encountered;
- Types of referrals to other entities;
- Specific education and outreach efforts; and
- Key findings and recommendations.

Awardees will submit their progress reports electronically to CMS staff for evaluation and analysis. The results of this evaluation will provide feedback on the effectiveness of the Navigator Programs, in order that CMS leadership may evaluate the effectiveness of the program and address any areas that need revisions.

CMS will also use the information collected from Assister organizations, including both Navigator and EAP organizations, to inform the public about the availability of application services from designated organizations.

3. Use of Information Technology

Awardees are required to log and track information on consumers assisted through the eligibility and enrollment process in order to report required data elements to CMS weekly, monthly, quarterly, and annually. An awardee should be able to provide data, which include but are not limited to, the number of consumers assisted with selecting in a qualified health plan, the number of consumers assisted with applying for Medicaid/CHIP, the number of consumers assisted with enrolling into SHOP, etc. Awardees should also track information on consumers who have been assisted with filing exemptions and other

³ Navigator grant funding opportunity announcement is available at: <http://www.grants.gov>.

information detailed in the reporting templates.

All Navigator awardees will submit their progress reports electronically via the Health Insurance Oversight System (HIOS) for CMS staff to evaluate and analyze. Navigator entities will receive instructions on how they are to create and submit progress reports. Details on the specific electronic format for submission will be made available to Navigators after awards are made.

Reports sent to CMS will not contain personally identifiable information.

In addition, CMS will also use a public facing website to display information collected from Assister organizations, including Navigator and EAP organizations, that will support consumers seeking enrollment assistance from any designated Assister organization. Any updates and corrections to that information can be submitted electronically by the Assister organization to ensure that accurate and current information is available to the public.

Government Paperwork Elimination Act (GPEA)

Is this collection currently available for completion electronically?

Yes, the data collection elements have been determined and are available for completion electronically.

Does this collection require a signature from the respondent(s)?

- Navigator awardees will submit progress reports using the format prescribed by CMS. While they must identify themselves, there is no requirement for an electronic signature.

If CMS had the capability of accepting electronic signature(s), could this collection be made available electronically?

- Not applicable. The collection will be made electronically. An e-signature will not be required.

If this collection isn't currently electronic but will be made electronic in the future, please give a date (month & year) as to when this will be available electronically and explain why it can't be done sooner.

- Not applicable. The collection will be made electronically.

If this collection cannot be made electronic, or if it isn't cost beneficial to make it electronic, please explain.

- Not applicable. The collection will be made electronically.

4. Duplication of Efforts

This information collection does not duplicate any other effort and the information cannot be obtained from any other source.

5. Small Businesses

There are no unique impacts to small businesses involved.

6. Less Frequent Collection

CMS will require data collection on a weekly, monthly, and quarterly bases for program oversight. An annual progress report is also required.

It is necessary to collect metrics on a weekly basis due to the nature of the program. The weekly metrics will be collected and aggregated on a monthly basis. However, the number of metrics previously required in the weekly report has been reduced to allow for additional monthly data collection. The monthly data collection supports increased program oversight and allows grantees to make adjustments to their strategy or performance during the critical open enrollment period. In addition, the reporting requirements for the quarterly progress report has been reduced.

It is also pertinent to collect information from Assister organizations to inform the public about the availability of services. Any updates or corrections from Assister organizations may occur on an as needed bases.

7. Special Circumstances

Explain any special circumstances that would cause an information collection to be conducted in a manner:

Requiring respondents to report information to the agency more often than quarterly;

- Due to the cooperative agreements, CMS will be closely working with grantees to support the Navigator program, particularly prior to and during the Marketplace open enrollment period. The data collection requirements address the frequency of reporting which includes weekly, monthly, and quarterly. Such data collection and reporting allows for greater oversight and monitoring of programmatic activities prior to and during open enrollment.

Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;

- If specific concerns are reported, the Secretary may require a more focused report to study the nature of these findings.

Requiring respondents to submit more than an original and two copies of any document;

- Not applicable. CMS will not require more copies than an original and two copies of any document.

Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;

- Awardees must retain records for three years from date of notice of award for auditing purposes.

In connection with a statistical survey that is not designed to produce valid and reliable results that can be generalized to the universe of study;

- Not applicable. Statistical surveys are not contemplated for this program. The measureable data obtained from this program will generate important information to assure that the program is

serving consumers as required.

Requiring the use of a statistical data classification that has not been reviewed and approved by OMB;

- Statistical surveys are not contemplated for this program. The measureable data obtained from this program will generate important information to assure that the program is serving consumers as intended.

That includes a pledge of confidentiality that is not supported by authority established in statute or regulation that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or

- Not applicable.

Requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

- Not applicable. This is outside the scope of our reporting requirements.

8. Federal Register/Outside Consultation

Following the 60-day comment period in the 80 CFR 16678; May 30, 2015, CMS received fourteen (14) comments from consumer assistance organizations and non-profit groups about the process of collecting data on Navigator activities. Responses to the comments are available in Appendix A.

9. Payments/Gifts to Respondents

Payments and gifts will not be provided.

10. Confidentiality

CMS will not collect personally identifiable information from awardees as a part of this grant. All reporting will be of aggregate nature.

11. Sensitive Questions

- In order to perform their required duties, Navigators may need to communicate with clients about sensitive topics, such as their health status and needs, in order to assist with eligibility determinations and enrollment. As such, some information such as individual or family income, employment status, citizenship, and other characteristics that people might commonly consider private may be communicated.
- As part of awardees' reporting requirements, awardees will provide CMS with aggregated data on total numbers of consumers enrolled in QHPs, the number of consumers assisted with applying for Medicaid/CHIP, the number of consumers assisted with enrolling into SHOP, etc. See *II. Data Collection Reporting* for additional information.

12. Burden Estimates (Hours & Wages)

CMS estimates that there will be approximately 34 FFM and SPMs and will accommodate adjustments to this number. Wage per hour data for Navigator caseworkers, project leads, and senior level executives are as follows:

Caseworker – GS-9 equivalent	\$20
Mid-Level Project Lead – GS-12 equivalent	\$29
Senior Level Executive – GS-15 equivalent	\$48

34 FFM and Partnership states x 3 grantees	102 Awardees
102 awardees x 4 Navigators on awardee’s staff	408 Navigator caseworkers
1 senior level executive per awardee	102 senior level executives
1 mid-level project lead per Navigator awardee	102 mid-level project leads
Total numbers of individuals providing assistance	102 Navigator caseworkers

The total cost to Navigator awardees over a 3 year period, assumes a 26% attrition and turnover rate of the caseworkers in the second and third years⁴, though the total number of these individuals will remain constant (408). The number of Project Leads (102) will remain constant in 2015, 2016, and 2017.

I. APPLICATION

This is already captured in SF-424 authority to collect information based on funding opportunity announcement requirements. Therefore, burden hour and cost have not been estimated for this collection and will be included with any future funding opportunity announcements.

II. DATA COLLECTION REPORTING

Data elements enumerated in the CMS-developed progress reporting template will be required from all Navigator awardees. CMS expects awardees to collect information that is relevant to tracking the operation of the Navigator program.

In addition, the data elements are reflected of the required duties as Navigators pursuant to section 1311(i) and 45 C.F.R. §§ 155.210 and 155.215. Analysis of progress and financial data reporting will enable CMS to ensure that the standards for Navigators are being upheld. Program data also can offer CMS one indication of the effectiveness of FFE Navigator programs, affording opportunities to provide technical assistance and support to Navigator entities and, in extreme cases, inform the need for increased monitoring and possible intervention.

The proposed collection fields are subject to modification based on available technology and informational needs. See appendix B for a crosswalk of changes to the collection fields.

A. Navigator Weekly Progress Report

Number of federally trained Assisters who are awaiting any applicable state certification

Number of consumers who have been assisted with general inquiries about health coverage

Number of consumers who have sought enrollment assistance from an Assister

⁴ <http://smallbusiness.chron.com/standard-employee-turnover-call-center-industry-36185.html>

Of the total number of consumers who have sought enrollment assistance from an Assister, provide the number of consumers who have been assisted with:

- Providing education only (no enrollment)
- Selecting a QHP
- Applying for Medicaid/CHIP
- Enrolling into SHOP
- Referrals to:
 - Medicaid/CHIP
 - Agents/brokers for SHOP assistance
- Taxes
- Filing exemptions
- Other _____

Number of consumers who have sought post-enrollment assistance from an Assister

If the consumer resides in a non-Medicaid expansion state, indicate the number of consumers assisted who fall in the coverage gap

Outreach, Education, and Marketing

List of outreach, education, and marketing events (including date, type of event {outreach, education, or marketing}, event name, sponsor/partner, event description, location, number of consumers targeted, number of Marketplace application started, type of population-based event, point of contact information)

B. Navigator Monthly Progress Report

Estimate the amount of grant funds spent during the previous month for:

Grant Year 2014-2015 _____ (if applicable)

Grant Year 2015-2016 _____

Estimate the amount of grant funds remaining as of the last day of the previous month for:

Grant Year 2014-2015 _____ (if applicable)

Grant Year 2015-2016 _____

Please indicate the activity that you have done this month, as applicable:

- Number of site visits conducted with sub-grantees/sub-recipients
- Number of internal assister training with staff and sub-grantees/sub-recipients
- Number of background checks for Assisters
- Number of breaches with protocols for collecting PII or retaining consent forms

Please explain how you ensure successful performance of your sub-grantees/sub-recipients.

Describe how you have collaborated with the HHS regional office and CMS regional office this month. Please note what is working well and any challenges you face.

Provide at least one example of a best practice this month in each of the categories:

- successful outreach and education tactics

- collaboration with others in the community, including partnering organizations, local businesses, etc.
- other

Estimate the percentage of people whose primary language is not English this month.

Provide an updated list of the organizations you are supporting with your Navigator grant funds.

C. Navigator Quarterly Progress Report

Provide at least one example of a best practice describing how your organization has adhered to Culturally and Linguistically Appropriate Services (CLAS) standards this quarter.

Provide at least one example of a best practice describing how your organization has ensured that consumers with disabilities have reasonable modifications and accommodations to access your Marketplace assistance services this quarter.

List five most common languages, other than English, spoken by consumers you have assisted this quarter.

Provide at least one example of a best practice describing how your organization has collected, retained, and protected consumers’ Personally Identifiable Information (PII) this quarter.

Upload a copy of your consent form (only required for quarter 1, unless modified) and describe how your organization has retained consent forms this quarter.

D. Navigator Annual Progress Report

The data collection for the Annual Progress Report will capture submitted updates from each quarterly report. In efforts to decrease the estimated burden for reporting, CMS will use the same questions from the quarterly reports to serve as a cumulative activity report for the entire grant cycle.

CMS will also collect information from Assister organizations, including both Navigator and EAP organizations, to inform the public about the availability of consumer enrollment services from the designated organizations. This information will be displayed on a public facing website. Any updates and corrections to that information can be submitted electronically by the Assister organization to ensure that accurate and current information is available to the public.

III. BURDEN ESTIMATES FOR REPORTS

Burden Estimates for Navigator Weekly Progress Reports

Total Hours: 23,868 Costs: \$501,228

The cost burden associated with the Weekly Progress Reports will apply to all Navigator awardees. The reports will be prepared by Navigator caseworkers. CMS estimates that each of the 102 grantees awardees (3 grantees x 34 states = 102) will have 4 caseworkers. CMS further assumes that caseworkers will spend approximately one hour each week to provide the required weekly submissions. A mid-level project lead will spend a ½ hour to review the submissions.

Hours: 4 caseworkers x 1 hour x 52 submissions = 208
Hours for all awardees: 208 hours x 102 awardees = 21,216
Costs: 21,216 hours x \$20 caseworker wage = \$424,320

Hours: 1 mid-level project lead x 1/2 hour x 52 submissions = 26
Hours for all awardees: 26 hours x 102 awardees = 2,652
Costs: 2,652 hours x \$29 mid-level wage = \$76,908

Burden Estimates for Navigator Monthly Progress Reports

Total Hours: 4,131 Costs: \$86,751

The cost burden associated with the Monthly Progress Reports will apply to all Navigator awardees. Navigator caseworkers will prepare the reports. CMS estimates that each of the 102 grantees awardees (3 grantees x 34 states = 102) will have 4 caseworkers. For the monthly reports, CMS approximates that caseworkers will spend a 3/4 hour each week to provide the required monthly submissions. A mid-level project lead will spend a 3/8 hour to review the submissions.

Hours: 4 caseworkers x 3/4 hour x 12 submissions = 36
Hours for all awardees: 36 hours x 102 awardees = 3,672
Costs: 3,672 hours x \$20 caseworker wage = \$73,440

Hours: 1 mid-level project lead x 3/8 hour x 12 submissions = 4.5
Hours for all awardees: 4.5 hours x 102 awardees = 495
Costs: 495 hours x \$29 mid-level wage = \$13,311

Burden Estimates for Navigator Quarterly Progress Reports

Total Hours: 1,112 Costs: \$29,594

The cost burden associated with the Quarterly Progress Reports will apply to all Navigator awardees. There will be four quarterly reports prepared as a result of information logged by Navigator caseworkers. CMS estimates that each of the 102 awardees will require 1 mid-level project lead working 1/8 hour to draft and compile a quarterly report of the caseworker's activities. A senior level executive will take 1/16 hour to review and grant clearance to each quarterly report.

Hours: 4 caseworkers x 1/2 hour x 4 quarterly submission = 8 hours
8 hours x 102 awardees = 816 hours
Costs: 816 hours x \$20 caseworker wage = \$16,320

Hours: 1 mid-level project lead x 1/8 hour x 4 quarterly submissions = .5 hour
.5 hour x 102 awardees = 51 hours
Costs: 51 hours x \$29 mid-level wage = \$1,479

Hours: 1/16 hour of senior level time x 4 quarterly reports = 2.4 hour
2.4 hour x 102 awardees = 244.8 hours
Costs: 244.8 hours x \$48 senior level wage = \$11,750

Burden Estimates for Navigator Annual Progress Report

Total Hours: 114.75 Costs: \$3,570

Reporting requirements for Navigator awardees include the submission of an Annual Progress Report due within 30 days from the end of the 12-month cooperative agreement period. CMS estimates that each awardee will require 1 mid-level project lead working 1 hour to complete their annual report on their activities for the previous year at mid-level wage:

Hours: 1 mid-level project lead x 1 hour = 1 hour
 1 hour x 102 awardees = 102 hours
 Costs: 102 hours x \$29 mid-level wage = \$2,958

CMS estimates that a senior level executive will take 1/8 hour to review and grant clearance to each annual report.

Hours: 1/8 hour x 102 awardees = 12.75 hours
 Costs: 12.75 hours x \$48 senior level wage = \$612

Burden Estimates for Updating or Correcting Assister Organization Information

The cost burden estimate will apply to all Navigator awardees. However, CMS requires all Assister organizations to update or correct organization information as needed. CMS estimates that each Navigator awardee will require ¼ hour to update or correct any submission to CMS:

Hours: ¼ hour x 102 awardees = 25.5 hours
 Costs: 25.5 x \$48 senior level wage = \$1, 224

Table 2 – Burden Estimates for Navigator Report Submissions

2014 Navigator Report Submissions	# of Respondents	Frequency	Responses	Annual Burden Hours	Annual Cost
Weekly Progress Report Submissions	99	52 reports/year	5,148	46,332	\$972,972
Monthly Progress Report Submissions	99	12 reports/year	1,188	1,337	28,067
Quarterly Progress Report Submissions	99	4 reports/year	396	1,733	36,927
Annual Report Submissions	99	1	99	111.375	3,465
2014 Total Navigator Report Submissions				49,512	\$1,041,431

2015 Navigator Report Submissions	# of Respondents	Frequency	Responses	Annual Burden Hours	Annual Cost
Weekly Progress	102	52 reports/year	5,304	23,868	\$501,228

Report Submissions					
Monthly Progress Report Submissions	102	12 reports/year	1,224	4,131	86,751
Quarterly Progress Report Submissions	102	4 reports/year	408	1,112	29,549
Annual Report Submissions	102	1	102	114.75	3,570
Assister Organization Information Submissions	102	4 updates/year	408	25.5	1,224
2015 Total Navigator Report Submissions				29,251.25	\$622,322

2016 Navigator Report Submissions	# of Respondents	Frequency	Responses	Annual Burden Hours	Annual Cost
Weekly Progress Report Submissions	102	52 reports/year	5,304	23,868	\$501,228
Monthly Progress Report Submissions	102	12 reports/year	1,224	4,131	86,751
Quarterly Progress Report Submissions	102	4 reports/year	408	1,112	29,549
Annual Report Submissions	102	1	102	114.75	3,570
Assister Organization Information Submissions	102	4 updates/year	408	25.5	1,224
2016 Total Navigator Report Submissions				29,251.25	\$622,322

2017 Navigator Report Submissions	# of Respondents	Frequency	Responses	Annual Burden Hours	Annual Cost
Weekly Progress Report Submissions	102	52 reports/year	5,304	23,868	\$501,228
Monthly Progress Report Submissions	102	12 reports/year	1,224	4,131	86,751
Quarterly Progress Report Submissions	102	4 reports/year	408	1,112	29,549
Annual Report Submissions	102	1	102	114.75	3,570
Assister Organization Information Submissions	102	4 updates/year	408	25.5	1,224
2017 Total Navigator Report Submissions				29,251.25	-\$622,322

	Total Burden Hours	Total Cost
3-Year Hours, Costs for Navigator Reports, and Assister Organization Information Submissions	87,753.75	\$1,866,966

13. Capital Costs

The grant announcement indicates that entities or individuals eligible to be Navigators must have expertise in the needs of underserved and vulnerable populations; eligibility and enrollment rules and procedures; the range of QHP options and insurance affordability programs; and privacy and security standards. Therefore, we do not anticipate that programs will need additional capital or startup costs beyond what is covered in awardees grant application.

14. Cost to Federal Government

NAVIGATOR GRANT APPLICATIONS

The review of the applications from FFM and SPM states for Navigator grants will be initially performed by an outside contractor with oversight by federal employees. The contractor will convene a panel of outside experts to evaluate applications and assist in the selection process. The recommendations of the panel of experts will be analyzed by the contractor. The contractor will then submit its recommendations to CMS for review.

A. Application Review by Federal Employees

CMS anticipates that the review of the recommendations of the contractor will include the review of the Navigator cooperative agreement applications of the 102 applications recommended for funding by the contractor, and may include the review of as many as 500 applications before a final selection is made. CMS estimates that each application will require one hour for an initial review by mid-level staff:

Hours: 500 applications x 1 hour (initial review) = 500
Costs: 500 hours x \$29 mid-level wage = \$14,500

Total for Federal Employee Application Review = \$14,500

B. Outside Panel Review

1. Identification of potential reviewers

Two mid-level staff will help to identify a panel of experts with the contractor. Mid-level staff will take about 4 hours to identify potential reviewers. CMS staff is limited to providing non-binding recommendations; the contractor will have ultimate authority in selecting panel members.

Hours: 2 mid-level staff identifying potential reviewers (3 hours each) = 6
Costs: 6 hours x \$29 mid-level wage = \$174

Total for Identification of Potential Reviewers = \$174

2. Participation in the panel review

Outside subject matter experts will participate as panel experts to review applications. In addition, two CMS senior level staff will participate in the panel review to answer questions from the panel of experts. CMS staff will not manage or control the agenda. CMS assumes the review process will take 10 eight-hour days.

Hours: 2 (senior level staff) x 8 hour work days x (10) days = 160
Costs: 160 hours x \$48 senior level wage = \$7,680

Total Hours for Outside Panel Review = 166
Total Cost for Outside Panel Review = \$7,854

C. Follow-up

Some applications will require follow-up telephone calls and other attempts to clarify information or seek additional information. CMS estimates that 75 applications will require follow-up review. Three mid-level CMS staff will require one hour each for follow-up.

Hours: 75 follow-up telephone calls x 3 mid-level CMS x 1 hour = 225
Costs: 225 hours x \$29 mid-level wage = \$6,525

D. Award Announcement and Awardee Notification

Mid-level CMS staff will be devoted to developing rollout materials (factsheets, FAQs, website language, press release, etc.) and follow-up notifications to awardees. CMS assumes that developing rollout materials will take 10 hours. A CMS senior level staff person will take two hours to review these materials. Further, it is anticipated that CMS mid-level staff will provide notification of the award to awardees.

Development of rollout materials:

Hours: 10 hours x 1 mid-level staff + 1 hour x 1 senior level staff = 11 hours

Costs: 10 hours x \$29 (mid-level wage) = \$290

1 hours x \$48 (senior level wage) = \$48

Total for Award Announcement: \$338

Awardee notification:

Hours: 102 awardees x .25 hour = 25.5

Costs: 25.5 hours x \$29 = \$739.50

Total for Awardee Notification: \$739.50

Total Hours for Award Announcement and Awardee Notification: 36.5

Total Cost for Award Announcement and Awardee Notification: \$1,077.50

E. Costs of Review of Quarterly and Annual Reports

Mid-level CMS staff will review quarterly and annual report submissions from Navigator awardees. CMS assumes that it will take 30 minutes to review each quarterly report and ½ hour to review each annual report. CMS further assumes that there will be 102 awardees submitting quarterly and annual Reports.

Hours: 102 Quarterly reports x 4 submissions per budget year x .50 hour = 204

102 Annual Reports x 1 submission per budget year x .50 hour = 51

Costs: 255 hours x \$29 mid-level staff wage = \$7,395

CMS estimates it will take Senior Level staff ½ hour to review the aggregate quarterly reports four times per year (for a total of two hours) and one hour to review the aggregate annual report.

Hours: 2 hours for Quarterly Reports + 1 hours for Annual Reports = 3 hours of senior level staff time

Costs: 3 hours x \$48 senior level staff wage = \$144

Total Hours for Review of Quarterly and Annual Reports = 258

Total Cost for Review of Quarterly and Annual Reports = \$7,539

Total Cost to Federal Government:

Description	Hours	Costs
Application review	500	\$14,500
Outside panel review	166	7,854
Follow-up	225	6,525
Award announcement and Awardee notification	36.5	1,077.50
Costs of review of quarterly and annual reports	258	7,539
Total	1,118.50	\$37,495.50

15. Changes to Burden

For this 3-year reporting cycle, CMS has made a number of adjustments that may impact the burden

levels. The weekly reporting requirements have been reduced significantly, decreasing the hourly and cost estimated burden. The monthly data collection has increased to account for more monitoring and oversight of grantee performance, resulting in minimal burden adjustments. The burden adjustments have been modified to accommodate more time for data collection for the monthly reporting requirements. Furthermore, the quarterly reporting requirements have been reduced substantially, yielding less hourly and costs burden than the previous year.

The overall burden for the reporting requirements has decreased in hours and costs per year, despite an increase in the number of respondents. Since the number of FFM states have changed from 33 to 34, the number of respondents has increased from 99 to 102 respondents. The increased number of respondents more accurately reflects the number of applications anticipated for review.

However, the subsequent changes to the number of respondents have affected the total burden for the cost to the federal government. The effect reflects a slight increase in the number of hours and costs.

CMS also requires Assister organizations to provide organizational information for the public facing website. Updates and corrections can be submitted electronically by the Assister organization to ensure that accurate and current information is available to the public. As a result of this change, there is a marginal increase in the number of hours and costs.

16. Publication/Tabulation Dates

At this time, CMS does not expect that the data collected in the weekly, monthly, quarterly, and annual reports will be published or shared with other agencies.

17. Expiration Date

CMS would like an exemption from displaying the expiration dates as these forms are used on a continuing basis. To include an expiration date would result in having to discard a potentially large number of forms.