

Supporting Statement – Part A
Cooperative Agreement to Support Navigators in
Federally-facilitated and State Partnership
Marketplaces CMS-10463/OMB Control
No.:0938-1215

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 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 Act 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 a Federally-facilitated Marketplace (FFM), including State Partnership Marketplace (SPM). 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 FFM (including SPMs), CMS awards these cooperative agreements.

In April 2013, CMS released a funding opportunity to support Navigator activities in FFM (including SPM) 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, CMS awarded approximately \$67 million to 105 Navigator grant applicants in FFM (including SPM) states. In June 2014, CMS released a second funding opportunity to support Navigator activities in FFM (including SPM) 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, CMS awarded approximately \$60 million to 92 Navigator grant applicants in FFM (including SPM) 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. When the Navigator program entered its third year, the project period under the 2015 funding opportunity changed from 12 months to 36 months, funded in 12-month increments known as budget periods. Continued funding for subsequent budget periods under the 2015 Navigator FOA is contingent on grantees continuing to meet all Navigator program requirements and the availability of funds. This change was designed to provide greater consistency for Navigator grantee organizations and their staff from year to year, reducing yearly startup time and providing for a more efficient use of grant funds.

Under these cooperative agreements, Navigator awardees are required to carry out all duties required under 45 C.F.R. §§ 155.210 and 155.215 to assist consumers and employees seeking health coverage in FFMs (including SPMs). The required duties established through these regulations include:

- 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:

- Charging any enrollee or applicant for 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) and Grant solutions. 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 the reporting requirements under the Navigator cooperative agreement, this information collection request includes Navigator and Enrollment Assister Program (EAP) organizations submitting to CMS any updates, additions, or deletions regarding Assister organization information.

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 the number of consumers assisted in selecting a qualified health plan, the number of consumers assisted in applying for Medicaid/CHIP, the number of consumers assisted in enrolling into SHOP, etc. Awardees should also track information on consumers who have been assisted in filing exemptions and other information detailed in the reporting templates.

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

All Navigator awardees must submit their progress reports electronically via CMS reporting systems 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 must 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, additions, or deletions to that information can be submitted electronically by the Assister organization to ensure that accurate and current information is available to the public.

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, additions, or deletions 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 81 FR 29268; May 11, 2016, CMS received forty-two (42) 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.

No individuals outside the Agency were individually consulted on either the data collection or analysis associated with this collection.

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 (including 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 2016, 2017, and 2018.

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

During one-on-one interactions with consumers, indicate the number of consumers Navigators have directly assisted with:

- Addressing general inquiries about health insurance options
- Understanding and using health insurance:
 - Health insurance literacy

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

- Locating providers
 - Billing and payment questions
- Enrolling in a QHP
- Medicaid/CHIP applications or referrals
- Enrolling into SHOP
- Answering questions about and/or making referrals to:
 - Agents/brokers
 - Medicare
 - Other consumer assistance/health insurance programs
 - Issuers
 - State departments of insurance
- Marketplace tax forms (1095-A)
- Filing Marketplace exemptions
- Submitting Marketplace or insurance coverage appeals
- Complex cases and other Marketplace issues, such as:
 - Data matching issues/Periodic data matching issues
 - SEP eligibility
 - Employer-sponsored coverage issues
 - APTC/CSR
 - Other (text field)

Events and Marketing/Promotion Activities

Provide a list of events and/or marketing/promotion activities.

For each event, include the date, time, name of event, sponsor/partner, event description, location, point of contact information, and type of population-based event {faith based, women, youth, African American, American Indian/Alaskan Native, Latino/Hispanic, Asian American/Pacific Islander, Lesbian/Gay/Bisexual/Transgender}, if applicable).

For marketing/promotion activities, provide a description of the activity and the number of consumers expected to be reached through social media impressions, viewership, listenership, etc.

B. Navigator Monthly Progress Report

Indicate the total amount of grant funds spent to date as of the last day of the previous month

Indicate the total amount of grant funds remaining as of the last day of the previous month

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, if applicable.

Describe how you have collaborated with the 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.
- work with CACs (if applicable)

Provide a complete list of the sub-grantee organizations you are currently supporting with your Navigator grant funds to perform Navigator duties. If there are any changes to the organizations who have served as sub-grantees (additions/deletions) during the current budget period, please indicate those changes along with a brief description.

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 up to 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, additions, or deletions 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: 17,238 Costs: \$356,694

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 3/4 hour x 52 submissions = 156
Hours for all awardees: 156 hours x 102 awardees = 15,912
Costs: 15,912 hours x \$20 caseworker wage = \$318,240

Hours: 1 mid-level project lead x 1/4 hour x 52 submissions = 13
Hours for all awardees: 13 hours x 102 awardees = 1,326
Costs: 1,326 hours x \$29 mid-level wage = \$38,454

Burden Estimates for Navigator Monthly Progress

Reports Total Hours: 3,978 Costs: \$82,314

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 1/4 hour x 12 submissions = 3
Hours for all awardees: 3 hours x 102 awardees = 306
Costs: 306 hours x \$29 mid-level wage = \$8,874

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 ½ 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, Adding or Deleting Assister Organization Information

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

2016 Navigator Report Submissions	# of Respondents	Frequency	Responses	Annual Burden Hours	Annual Cost
Weekly Progress Report Submissions	102	52 reports/year	5,304	17,238	\$356,694
Monthly Progress Report Submissions	102	12 reports/year	1,224	3,978	\$82,314
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				22,471	\$473,351

2017 Navigator Report Submissions	# of Respondents	Frequency	Responses	Annual Burden Hours	Annual Cost
Weekly Progress Report Submissions	102	52 reports/year	5,304	17,238	\$356,694
Monthly Progress Report Submissions	102	12 reports/year	1,224	3,978	82,314
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				22,471	\$473,351

2018 Navigator Report Submissions	# of Respondents	Frequency	Responses	Annual Burden Hours	Annual Cost
Weekly Progress Report Submissions	102	52 reports/year	5,304	17,238	\$356,694
Monthly Progress Report	102	12 reports/year	1,224	3,978	82,314

Submissions					
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
2018 Total Navigator Report Submissions				22,471	\$473,351

	Total Burden Hours	Total Cost
3-Year Hours, Costs for Navigator Reports, and Assister Organization Information	67,413	\$1,420,053

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 (including 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:

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

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

B. Outside Panel

Since CMS now has awarded a three-year grant beginning in 2015, the outside panel was only required for the initial grant application process.

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.

Costs: 75 follow-up telephone calls x 3 mid-level CMS x 1 hour 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:

Costs: 10 hours x \$29 (mid-level wage) = \$290
1 hours x \$48 (senior level wage) = \$48

Awardee notification:

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

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.

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.

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

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

Cost to Federal Government:

Description	Costs
Application review	\$14,500

Outside panel review	0
Follow-up	6,525
Award announcement and Awardee notification	1,077.50
Costs of review of quarterly and annual reports	7,539
Total	\$29,641.50

15. Changes to Burden

The total burden hour estimate was reduced from 29,254 to 22,471, a total reduction of 6,738 hours. For the last two years of this 3-year reporting cycle, CMS has made some adjustments that may impact the burden levels. The weekly reporting requirements have been reduced significantly to a single metric containing multiple data elements. This consolidation of the weekly metrics decreases the hourly and cost estimated burden as well as clarifies the intended measures. CMS has also changed the outreach/enrollment, education, and marketing tool to simplify the event type and only captures events and marketing/promotion activities. The events and marketing/promotion tool now includes data elements for collecting viewership, listenership, social media impressions, etc., removes the number of Marketplace application started, and eliminates the data element on the number of consumers targeted. The monthly data collection has also been reduced, 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 report requirement contains a minor editorial change. The final reporting requirements will remain the same and will have no impact on the burden estimates. CMS also requires Navigator and EAP organizations to provide organizational information for the public facing website. Updates, additions, or deletions can be submitted electronically by the Navigator and EAP 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. Since CMS now has awarded a three-year grant beginning in 2015, the outside panel was only required for the initial grant application process, thereby reducing the burden.

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

The expiration date will be displayed on the reporting instrument.