Justification for Nonsubstantive Change

Skilled Nursing Facility (SNF) Minimum Data Set (MDS) 3.0 Nursing Home and Swing Bed Prospective Payment System (PPS) Item Sets (NP, NO/SO, NS, NOD, NSD)

CMS-10387, OMB 0938-1140

**Summary**

The following describes this iteration’s nonsubstantive changes, consisting of two corrections and one adjustment. Correction #1 reintroduces burden that was previously approved but was inadverantly removed. Correction #2 addresses ROCIS data entry errors. The Adjustment makes a few burden changes that are based on more current data.

This request does not revise any requirements, nor does it propose any program changes. Likewise, our per response burden estimate is unchanged.

**Correction #1**

Our most recent information collection request (approved on February 6, 2017) had inadvertently excluded and burden that was approved on January 15, 2014.

The January 2014 information collection request added the NP, NS, NOD, and NSD assessments. While the February 2017 request included the all of correct instruments, the Supporting Statement inadvertantly set out text specific to the original request, namely the NO/SO PPS assessment. The Supporting Statement incorrectly omitted the previously approved text related to the NP, NS, NOD, and NSD assessments.

This nonsubstantive iteration corrects those omissions by including the previously approved (January 2014) burden and by adding the previously approved text (also January 2014) related to the NP, NS, NOD, and NSD assessments.

**Correction #2**

The February 2017 Supporting Statement’s burden estimates do not match the figures in the ROCIS burden table.

This nonsubstantive iteration corrects the ROCIS table’s data entry errors so they mirror what was in the Supporting Statement.

**Adjustment**

Based on more recent data, this nonsubstantive iteration adjusts:

-The number of respondents by +2.

-The number of responses (per respondent) by +8.

-The number of responses (total) by +160,357.

-The number of hours (total) by -917,808.

**Summary of Changes**

The following figures reconcile this iterations nonsubstantive changes which culminate in our final burden estimates.

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| **Respondents** |
| Jan 15, 2014 (Supporting Statement) | 15,376 |
| Feb 6, 2017 (Supporting Statement) | 15,445 |
| Correction #1 | n/a |
| *Subtotal* | *15,445* |
| Feb 6, 2017 (ROCIS burden) | 15,421 |
| Correction #2 | +24 (15,445 – 15,421) |
| *Subtotal* | *15,445 (15,421 + 24)* |
| Adjustment | *+2* |
| **Final Estimate** | **15,447 (15,445 + 2)** |

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| **Number of Responses (Assessments) Per Facility** |
| Jan 15, 2014 (Supporting Statement) | 416 |
| Feb 6, 2017 (Supporting Statement) | 45 |
| Correction #1 | +371 |
| *Subtotal* | *416 (45 + 371)* |
| Feb 6, 2017 (ROCIS burden) | *44* |
| Correction #2 | +1 (45 – 44) |
| *Subtotal* | *417 (416 + 1)* |
| Adjustment | +8 |
| **Final Estimate** | **425 (417 +8)** |

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| **Responses (Total)** |
| Jan. 15, 2014 (Supporting Statement) | 6,392,971 |
| Feb 6, 2017 (Supporting Statement) | 688,540 |
| Correction #1 | +5,704,431 |
| *Subtotal* | *6,392,971* |
| Feb 6, 2017 (ROCIS burden) | 678,524 |
| Correction #2 | +10,016 (688,540 – 678,524) |
| *Subtotal* | *6,402,987 (6,392,971 + 10,016)* |
| Adjustment | +160,357 |
| **Final Estimate** | **6,563,344** |

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| **Time Per Response** |
|  | Preparation | Coding | Transmission |
| Jan. 15, 2014 (Supporting Statement) | 0.8333 | 0.1667 | 0.0333 |
| Feb 6, 2017 (Supporting Statement) | 0.6667 | 0.1667 | 0.0167 |
| Correction #1 | none (n/a) | none (n/a) | none (n/a) |
| Correction #2 | none (n/a) | none (n/a) | none (n/a) |
| Adjustment | none (n/a) | none (n/a) | none (n/a) |
| **Final Estimate** | **0.6667** | **0.1667** | **0.0167** |

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| **Total Hours (annual)** |
| Jan 15, 2014 (Supporting Statement) | 6,608,971 |
| Feb 6, 2017 (Supporting Statement) | 590,841 |
| Correction #1 | +6,018,130 |
| *Subtotal* | *6,608,971 (590,841 + 6,018,130)*  |
| Feb 6, 2017 (ROCIS burden) | 701,119 |
| Correction #2  | -110,278 (590,841 - 701,119) |
| *Subtotal* | *6,498,693 (6,608,971 – 110,278)*  |
| Adjustment | -917,808 |
| **Final Estimate\*** | **5,580,885** |

**Collection Instruments and Supplemental Documents**

The information collection documents included with this request consists of the following:

-Supporting Statement A (Revised)

-Crosswalk (Removed, not applicable)

-Nursing Home PPS (NP) Item Set (No Changes)

-Nursing Home OMRA-Start of Therapy and Discharge (NSD) Item Set (No Changes)

-Nursing Home and Swing Bed OMRA-Start of Therapy (NS/SS) Item Set (No Changes)

-Nursing Home OMRA-Discharge (NOD) Item Set (No Changes)

-Nursing Home and Swing Bed OMRA (NO/SO) Item Set (No Changes)