

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 inadvertently 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 inadvertently 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.

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

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

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

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

Total Hours (annual)

Jan 15, 2014 (Supporting Statement)	6,608,971
Feb 6, 2017 (Supporting Statement)	590,841
Correction #1	+6,018,130
<i>Subtotal</i>	<i>6,608,971 (590,841 + 6,018,130)</i>
Feb 6, 2017 (ROCIS burden)	701,119
Correction #2	-110,278 (590,841 - 701,119)
<i>Subtotal</i>	<i>6,498,693 (6,608,971 - 110,278)</i>
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)