Application to Use Burden/Hours from Generic PRA Clearance: Medicaid and CHIP Program (MACPro) (CMS-10434, OMB 0938-1188)

Information Collection #1 Initial Application

Center for Medicaid and CHIP Services (CMCS) Centers for Medicare & Medicaid Services (CMS)

A. Background

CMS is in the process of evaluating Medicaid systems currently operating, and building an enterprise architecture platform and data repository. The goal is for CMS to allow for a single point of entry to access various program and operational data applications. This effort is being implemented in phases over the next several years. Phase 1 provided for a Medicaid and CHIP Program (MACPro) data system access through a web portal that automates the input and retrieval of data from the States related to the State Medicaid and CHIP Plans. This system supports an efficient workflow for the review and approval of the State Medicaid and CHIP adjudication process. States will access this system and submit program information into structured data templates. CMS staff will review the submission templates for compliance with Federal statute, regulation and policy, provide feedback to the States and track/monitor the review and approval process. Future project phasing will provide for the design, delivery and implementation of financial management programs and performance and quality metrics.

This package seeks OMB approval to migrate from the current "paper based" system and transition MACPro to a fully functioning electronic system so that MACPro becomes the sole system of record. MACPro will be the required means for states to amend Medicaid and CHIP state plans, waivers, and demonstrations. Eventually, the MACPro system will provide access to all the State Plans and other program data by all CMS MACPro users according to their user roles.

We also propose to convert this information collection request from a regular PRA package to a generic package. OMB's approval of MACPro under the generic process is vital for CMS and for States since the implementation of SPA templates is often time sensitive and must be coordinated with the release of guidance documents such as regulations and policy letters. Additionally, the release of some SPA templates must consider the States' time constraints to comply with statutory and regulatory deadlines.

B. Description of Information Collection

42 CFR 430.12 sets forth the authority for the submittal and collection of State plans and plan amendment information in a format defined by CMS. A State plan for Medicaid consists of preprinted material that covers the basic requirements, and individualized content that reflects the characteristics of the particular State's program. Pursuant to this requirement, CMS has created the MACPro system. This system will be used by CMS and State Medicaid agencies. Overall, MACPro will be used by both State and CMS officials to improve the State application and Federal review processes, improve Federal program management of Medicaid programs and CHIP, and standardize Medicaid program data. Specifically, it will be used by State agencies to (among other things):

- Submit and amend Medicaid State Plans, CHIP State Plans and Information System, Advanced Planning Documents (APDs);
- Submit applications and amendments for State waivers, demonstration, benchmark and grant programs.

In addition, it will be used by CMS to (among other things):

- Provide for the review and disposition of applications; and
- Monitor and track application activity.

CMS is releasing Adobe pdfs (PDFs) that reflect the screens that were developed for the MACPro system. States will fill out these forms electronically in the same manner they will eventually fill them out in the MACPro system. States will then submit them via a web portal to an existing CMS vehicle, the Medicaid Model Data Lab (MMDL). In this manner, we will begin the process of engaging states electronically for the purpose of changing Medicaid or CHIP programs. The level of effort to fill out these forms remains the same as will be necessary with the full MACPro system, as does the level of effort to submit the forms. The PDF interim process will be used for the CHIP eligibility templates that have received PRA approval as part of the MACPro system.

<u>C. Deviations from Generic Request</u>

No deviations are requested.

D. Burden Hour Deduction

In section 12.3 of Supporting Statement part A we estimate an overall burden ceiling of 96,844 hours. As set out below under Burden Estimate, this generic information collection request would require 476 hours. The ending balance is 96,368 hours which can be used over the upcoming 3-year OMB approval period.

Wage Estimate

CMS has reviewed the wages from the Bureau of Labor Statistics (BLS) and estimates that the complexity of the form and the certification requirements will require several levels of employees to gather, input, and review the data. CMS has reviewed the wages from the BLS' National Occupational Employment and Wage Estimates (May 2014) and estimates a Medical and Health Services Manager (11-9111) would be necessary to complete the report (see http://www.bls.gov/oes/current/oes_nat.htm). The following table presents the mean hourly wage, the cost of fringe benefits (calculated at 100 percent of salary), and the adjusted hourly wage.

Occupation Title	Occupation Code	Mean Hourly Wage (\$/hr)	Fringe Benefit (\$/hr)	Adjusted Hourly Wage (\$/hr)
Medical and Health Services Manager	11-9111	\$49.84	\$49.84	\$99.68

As indicated, we are adjusting our employee hourly wage estimates by a factor of 100 percent. This is necessarily a rough adjustment, both because fringe benefits and overhead costs vary significantly from employer to employer, and because methods of estimating these costs vary widely from study to study. Nonetheless, there is no practical alternative and we believe that doubling the hourly wage to estimate total cost is a reasonably accurate estimation method.

Burden Estimate

Entry of State Plan information for the purpose of transitioning current paper material to electronic involves not only direct entry of choices from one medium to the other, but also the translation of current narrative sections into structured choices. This needs to be done by someone who is knowledgeable about the State's program design, and who can understand and interpret the narration. Also, the paper State Plan and the electronic version are not organized exactly the same way. This is because of the decision to include all the information unique to each eligibility group with that particular group instead of scattering it across various attachments and supplements. This will add time to the initial transition, because information relating to each group must be located across the attachments and supplements and then entered. After that, it should save time because it will all be located in one place.

The burden for respondents to complete the form is estimated to average 8.5 hours per response (see breakout below). We estimate that 56 responses will be submitted for a total burden of 476 hours (56 responses x 8.5 hours).

- <u>MACPro Home Page (required and on-going task)</u> The home page also known as the Landing Page or the Main Page. The Home Page is the 1st screen that a user sees upon entering the MACPro system. From the home page, users select one of the following three icons:
 - Action where you go to perform system actions;
 - Various items and other guidance information are available by clicking the Action icon.
 - To Do where to go to view and complete tasks or assignments; and
 - Tracking is where you go to view internal event logs.

The home page is designed to be navigation page for performing various actions and for obtaining information within the system. The total time that could be spent to complete this 1 page Form is **15 to 30 minutes**.

- <u>Initial Application (required and on-going for all authorizes)</u> The Initial Application Form captures data about the submission. It identifies if it's a Baseline, or amendment or a new submission and allows the system to present the necessary forms to the state user. Each time the state submits a change to CMS they will complete the Initial Application form. The initial application is composed of 5 pages. The average completion time for each page is 30 to 60 minutes. Thus, completion of the initial application ranges from **2.5 to 5 hours.**
- <u>Medicaid Administration (required and on-going for adjunction of a Medicaid/SPA action) –</u> This 3 page Form is required and ongoing for any state that proposes to make a change to their state plan. The average completion time for this Form is 30 to 60 minutes for a total of **1.5 to 3 hours.**

The mean hourly wage is \$49.84 with a fringe benefit of 100% giving us an hourly wage of \$99.68. Thus the cost for a respondent to complete the response report is estimated at \$847. There is a total of 56 responses giving us a total cost of \$47,448.

Required and Ongoing	# of Labor	Wage (per hour)	Annual Labor
Tasks	Hours		Costs
Required non-authority	154 – 308	\$99.68/hr	\$15,351 - \$30,701
specific (Home Page			
and Initial Application)			
Forms			
Medicaid Admin	84 - 168	\$99.68/hr	\$8,373 - \$16,746
Completion of All	238 – 476	\$99.68/hr	\$23,724 - \$47,448
Forms			

PDF images of state plan documents will be posted in MACPro as the working copy of the State Plan, and until the state amends that section using the approved MACPro template for that authority. Eventually, the MACPro system will provide access to all the State Plans and other program data for all CMS MACPro users according to their user roles.

Information Collection Instruments and Associated Instruction/Guidance

GenIC #1 Screen Shot - MACPro Home Page.jpg

GenIC #1 Screen Shot - Initial Application.pdf

- #1 IG_I1_State Information_R1_Draft_11-30-12.docx
- #1 IG_I2 Medicaid State Plan Specific Submission Data_R1_Draft_11-30-12.docx
- #1 IG_I4 CHIP Amendment Submission_R1 Final_11-30-12.docx
- #1 IG_I5 Public Comment_R1_Draft_11-30-12.docx
- #1 IG_I6 Tribal Input_R1_Draft_11-30-12.docx

GenIC #1 Screen Shot - SPA Admin.pdf (screen shots)

- #1 IG_A1-Designation and Authority_R1_Final_11-30-12.docx
- #1 IC_A2-Organization and Administration_R1_Final_11-30-12.docx
- #1 IG_A3-Assurances_R1_Final_11-30-12.docx

<u>E. Timeline</u>

Not applicable.