

Application to Use Burden/Hours from Generic PRA Clearance:
Generic Social Marketing & Consumer Testing Research
(CMS-10437, OMB 0938-1247)

Generic Information Collection (GenIC) #: Medicare Form 500 Testing

Office of Communications (OC)
Centers for Medicare & Medicaid Services (CMS)

A. Background

The Office of Communication will be collaborating with a research contractor to conduct testing of the Medicare Form 500 Premium Payment materials. CMS uses notices and forms to communicate with consumers about their Medicare premiums, when they do not have their Medicare premium payments automatically taken from their Social Security disbursements. The purpose of the research is to examine users' experience using the form to understand what they owe, how to pay, and what the ramifications for non-payment would be. Findings from this study will be used to guide further improvements to the Form prior to finalization.

B. Description of Information Collection

On October 13, 2010, former President Barack Obama signed into law the Plain Writing Act of 2010, requiring federal agencies to use "clear Government communication that the public can understand and use." On January 18, 2011, former President Obama issued a new Executive Order, "E.O. 13563 – Improving Regulation and Regulatory Review," which states that regulations must be "accessible, consistent, written in plain language, and easy to understand." Section 10104(g) states that the "use of language services and community outreach adds to the implementation of activities to reduce health and health care disparities." To comply with this act, CMS is responsible for ensuring that all written outreach and education information that is developed by the agency is understandable and easy to use. In this round of research, a research contractor will conduct usability testing with participants as they review mock-ups of revised Medicare Form 500 materials.

C. Deviations from Generic Request

No deviations are requested.

D. Burden Hour Deduction

There will be up to 27 individual in-depth interviews with Medicare beneficiaries. We anticipate testing the Form 500 bill with up to 27 participants, as we are examining specific content changes that are being made to an already existing document. Given the scope of the content changes, we expect that we will be able to discern patterns of usability and comprehension relatively quickly – typically, the types of usability and comprehension trends we are examining become apparent with as few as 6-9 respondents. This form typically conveys three particular situations: 1. Current bill – this contains only currently due amounts; 2. Delinquent bill – this contains at least one overdue amount; 3. Easy Pay bill – this contains amounts paid via easy pay. Recipients need to focus on specific information to understand next steps in each of these situations. To ensure that participants appropriately understand what information is most important in each situation, we will show bills that show due amounts for each situation to up to nine participants each.

The data will be collected via individual in-depth interviews with individuals around the country. The interviews are expected to take approximately 60 minutes. The total approved burden ceiling of the generic ICR is 26,588 hours. We are requesting a total deduction of 27 hours from the approved burden ceiling (27 participants x 1 hour = 27 hours).

Respondents will be offered a cash incentive of \$40. This level of participant incentive is in keeping with that specified in the original Supporting Statement for this collection, i.e., *in accordance to OMB Circular*

A-21, section C, and subsection 3 “Reasonable Costs”. A more detailed justification for providing incentives is appended to this application.

E. Timeline

CMS hopes to begin this collection on August 10 to ensure that findings are available for finalizing the changes to the Form-500 materials, which are intended to being use in early 2021.

The following attachments are provided for this information collection:

- Form 500 Testing Guide
- Justification for Providing Incentives for Participation in Marketing Research – Qualitative Studies