

Appendix I: Comment & Response Summary
Limited Wraparound Coverage Reporting
(CMS- 10571/OMB control number 0938-NEW)

We sought comments on the content of the proposed collection form. We also sought comments on the impact that an extension of the limited wraparound pilot program would have on the number of employers/sponsors participating in the limited wraparound pilot program. In addition, if HHS extends the limited wraparound pilot program, we sought comments on when the limited wraparound pilot program should sunset, or whether the limited wraparound pilot program should be made permanent. We received 13 comments.

Comment: Commenters did not express any concerns about the information collection and the form. Two commenters had suggestions regarding two specific fields in the reporting form. They suggested adding clarifications to the instructions for entering the plan identification number when the plan sponsor is not subject to ERISA and is not assigned such a number. They also suggested clarifying how to report the employer's name when the plan covers multiple employers.

Response: We made revisions to the form to address the comments, as detailed in Appendix II.

Comment: All Commenters expressed support for the limited wraparound pilot program and recommended extending it. Some commenters shared positive experiences and interest in limited wraparound coverage. All commenters stated that short time period for the pilot program has resulted in limited participation in the program.

All commenters also stated that extending the program would allow more plan sponsors to create limited wraparound programs, continue benefits of current programs and better evaluate the impact of such programs. Commenters recommended that the program be made permanent or extended for a minimum of 10 years.

Response: We thank the commenters for providing us with their perspectives on the program. The Department of Treasury, the Department of Labor and the Department of Health and Human Services are taking these recommendations under consideration.