

# **Request for a Non-Substantive Change to an Existing Approved Information Collection**

(OMB Control No. 0938-1221)

## **I. Introduction**

*Why is CMS Requesting a Non-Substantive Change?*

This non-substantive change request makes corrections to the 2018 QHP Enrollee Experience Survey (QHP Enrollee Survey) Questionnaire, approved under OMB Control No. 0938-1221 and is summarized herein. The changes described in this request do not introduce new measures or concepts. However, these changes will improve validity and nominally reduce burden and are being submitted for approval for the 2019 administration of the QHP Enrollee Survey.

## **II. Description of Non-Substantive Changes**

*What is the current status of this ICR?*

The Health Insurance Exchange Consumer Experience Survey Data Collection (CMS-10488), [OMB Control No. 0938-1221](#), is currently approved through September 30, 2020. The total annual burden approved for this ICR is 22,523 hours, with an estimated 90,015 responses per year. CMS anticipates a nominal reduction in burden based on the implementation of these non-substantive changes.

*What are the changes that CMS is making?*

CMS is making two distinct non-substantive changes to the QHP Enrollee Survey:

### **Correction One**

CMS is collapsing screener (or gate) questions into subsequent items. This non-substantive change reduces survey burden by decreasing the number of items, while simultaneously retaining data quality of the QHP Enrollee Survey<sup>1</sup>. Under this new format, CMS will obtain the response rate for the screener by analyzing the frequency of the “Not Applicable” response option. Additionally, this change will reduce the number of skip patterns which can be confusing to respondents and may inadvertently lead to scoring and analysis errors. This correction affects the following items: 3, 5, 10, 12, 19, 22, 25, 30, 14, 36, 38, 40, and 44.

### **Correction Two**

CMS is correcting the placement of certain questions and, in one instance, is moving an entire question set’s location. CMS is moving the “Health Plan” question set from its position as the last question set to the first question set. This non-substantive change emphasizes the key focus of the survey, “Your Health Plan.” By placing this question set at the beginning of the questionnaire, CMS hopes to reduce potential bias/priming effects due to the other sections being administered first. Additionally, this placement may increase the response rate of these items, all of which are important to the survey’s primary stakeholders, this could provide potentially

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<sup>1</sup> Questionnaire Design. Pew Research Center. <http://www.pewresearch.org/methodology/u-s-survey-research/questionnaire-design/#question-order>. Accessed February 27, 2018.

actionable quality improvement data to QHP issuers. CMS is also moving health insurance literacy questions from the “About You” section, to the “Your Health Plan” section. This correction affects the following items: 34-54, 79, and 80.

In addition, CMS is correcting the placement of global rating items to the end of their relevant sections. This correction will improve the validity of the instrument by ensuring consistency in item order effects across all global ratings.<sup>2</sup> The literature indicates that validity is stronger when global items were asked at the end of the scale.<sup>3</sup> This correction affects the following items: 8,24, and 50.

Next, CMS is correcting the placement of an item about specialist health care providers while removing an unnecessary screener. This move allows for all items regarding specialists to be grouped together in the, “Getting Health Care From Specialists” section and eliminates an unnecessary screener. This correction affects the following items: 22 and 23.

### **III. Description of Burden Adjustments**

Based on the two corrections described above, CMS estimates it will take 12.5 minutes to complete the 2019 QHP Enrollee Survey IC questionnaire under OMB Control No. 0938-1221. We are revising the Supporting Statement Part A burden tables accordingly.

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<sup>2</sup> Farrar, J.T. The global assessment of pain and related symptoms. Oral presentation at the 4<sup>th</sup> Initiative on Methods, Measurement, and Pain Assessment in Clinical Trials (IMMPACT) Conference, Washington, DC. 2004.

<sup>3</sup> Lee, S. Schwartz, N. and Goldstein, L. Culture-Sensitive questions order effects of self-rated health between older Hispanic and Non-Hispanic adults in the United States. *J. of Aging and Health*.2013; 5:860-883. <https://doi.org/10.1177/0898264314532688>