



Memorandum

To: Julie Wise, Office of Information and Regulatory Affairs, OMB

Through: Mark Snyderman, Deputy Director, Center for Management and Budget, ACL, HHS

From: Rebecca Kinney, Director, Office of Healthcare Information and Counseling, CIP, ACL, HHS

Subject: Non Substantive Changes to the State Health Insurance Assistance Program (SHIP) Information Collection

Date: August 03, 2018

Request Overview:

This request relates to the State Health Insurance Assistance Program (SHIP) (OMB Control Number 0985-0040 - Expiration date 3/31/2020). As part of OMB's original approval for ACL to evaluate program effectiveness and improvement of this program, the following data collection tools were approved by OMB: Client Contact Form, Public and Media Activity Report Form, and Resource Report Form. Subsequent to receiving approval, the Administration for Community Living (ACL) has been in development of a new data system, one which will reduce the time burdens on volunteers and grantees.

The Department is requesting approval for slight alterations to the current collection tools. These alterations are based on ACL's analysis of the data collected and serve as a means to eliminate duplication, simplify questions, and to reduce time spent on text entry fields. ACL believes that the changes we are requesting are not substantive, would not change the nature of information being collected, and do not require republication in the Federal Register. The current approved collection tools are text and direct entry. ACL seeks to change the average time to complete these forms by changing some of the current direct entry items to a dropdown selection format.

ACL established an informal workgroup to help with the development and implementation of the new SHIP Data System, including these changes. This workgroup includes several SHIP Directors as well as representatives from the SHIP Technical Assistance Center and ACL. In addition, ACL and the SHIP TA Center have developed a thorough training plan which includes tip sheets, manuals, and webinars. If approved, ACL will communicate the changes in SHIP Data System trainings and at the SHIP Directors Conference set for August 20 - 23rd.

We estimate that this will result in an overall reduction in the amount of time it takes to complete a form by nearly 33%: from 326,860.34 hours to 214,404.50 hours.

ACL also seeks to separate the Public and Media Activity Report Form into two separate forms. They are as follows:

- Media Outreach & Education Form
- Group Outreach & Education Form

This separation will increase clarity and reduce inefficiencies by simplifying entry to focus on the necessary elements for each activity and reducing duplicate data entry. The information that follows includes an overview of the existing collection tool and the proposed changes.

ACL would also like to modify and rename the Resource Report in the SHIP Information Collection (IC) to the Team Member Form. The Resource Report was a tool used by the SHIP to calculate the total time burden that was being spent on the SHIP per state, per year. The proposed Team Member Form is a one-time collection that will enroll team members into the SHIP data system. SHIP defines team members primarily as volunteers and counselors working for the SHIP. This cadre of volunteers' consist of 20,000 respondents that report through the SHIP data system.

ACL has included the proposed Team Member Form in the Time Burden Table. The Burden Table reflects the approximately 20,000 Team Members or SHIP respondents that will need to complete the Team Member Form. The initial burden will include all 20,000 respondents; however that is only for the first year of the New SHIP data system (2018). The subsequent years will collect data on approximately 10% of the total number of respondents. The 10% reflects the successful recruitment rate for the SHIPs. This column will be titled "2019 Team Member Form" in the proposed Time Burden Table.

Description of Approved Forms:

Following is a description of the approved forms. The originating statute, Section 4360 of the Omnibus Budget Reconciliation Act (OBRA) of 1990 (P. L. 101-508) (42 USC 1395b-4) and Section 4360(f) of OBRA 1990, requires the Secretary to provide a series of reports to Congress on the performance of the program, its impact on beneficiaries, and obtain important feedback from beneficiaries. All of the below forms are used by State Health Insurance Assistance Program (SHIP) trained team members only.

The approved information collection has three major components; and they are as follows:

- **Client Contact Form-** A Client Contact form records contact between a counselor/staff member and a beneficiary or his/her representative.
- **Public and Media Form-** A Public and Media (PAM) activity is an in-person interactive presentation to the public conducted by a SHIP, such as a booth/exhibit at a fair, conference, or other public event, and a radio, TV, or Web site event.
- **Resource Report Form-** A Resource Report allows a state SHIP Director to report data on SHIP counselors, coordinators, and staff within their state for the grant year covering April – March for a one year period.

Description of Proposed Changes:

ACL would like to propose the following changes. First change, is the Client Contact Form. Based on feedback received by ACL, the term “beneficiary” resonates more closely with Medicare beneficiaries versus the term “client.” Therefore we suggest changing the name of the form to the Beneficiary Form.

- ACL is also seeking to change three sections of the Client Contact Form. They are listed below:
 - Remove Client Identifiers
 - ACL has eliminated this portion from the Beneficiary Contact Form because data can be retrieved by tracking objects that are attached to the beneficiary counseling session referred to as an interaction¹. This is a feature of the New SHIP Data System.
 - How Did the Client Learn About SHIP
 - ACL has added some additional options to this section because we believe that will more clearly identify how beneficiaries are learning about the program. The new Fields that have been added to this section are:
 - Congressional Office
 - Health/Drug Plan
 - SHIP TA Center
 - SSA
 - State Medicaid Agency
 - 1-800 Medicare
 - Special Use Field
 - ACL has chosen to reduce the Special Use Fields (SUF) from twenty fields to three fields and would like to designate two fields for cost savings on the Beneficiary Contact Form. Previously, this section was used by both ACL (Federal Partner) and local SHIPs (State Partner) to collect data not specified in the forms that would not be found elsewhere in the aggregate information. SUFs provide states the ability to identify potentially ten different areas of concern for the state and trends in the state, as well as ten potentially different areas for ACL. ACL seeks to designate two fields to help identify potential cost savings. These new entry fields are not new information, but are pieces of information currently collected in the “notes” field. This information will be reported in the same area as the SUF, but because this is a designated field, SHIPs cannot designate these fields to something different. Making this change will allow for quicker and clearer entry and analysis.

¹ Tracking Objects can be described as subsequent information gathered after the initial interaction. An interaction can be described as the initial counseling session recorded in the SHIP data system used to inform and assist Medicare beneficiaries about selecting Medicare insurance.

ACL is proposing to separate the Public and Media (PAM)Form into two forms, which will allow ACL to view these activities separately. Additionally, the first section of the PAM form the 'Agency Code' and 'Presenter Information' will be eliminated because of system automation. The person entering the information into the form in the New SHIP system will be able to select team members from a drop down list to simplify entry and reduce errors. On both forms, 'session conducted by' will replace the direct entry presenter code. The Time Spent section is direct entry, but there is a limitation on the possible number of hours in order to reduce reporting errors. ACL also combined the four elements sections, 4 Radio Show, 5 Cable Show, 6 Electronic Other Activity, and Print Other Activity. On both the Media Outreach & Education Form and Group Outreach & Education Form the number of SUFs will remain at five.

- Media Outreach & Education Form
 - The Media Outreach forms will contain the following elements along with the common elements listed in the common elements portion:
 - Type of Media
 - Geographic Coverage
- Group Outreach & Education Form
 - The Group Outreach & Education Form will contain the following elements:
 - Session Conducted By
 - Title of Interaction
- Media Outreach & Education and Group Outreach & Education Form Common Elements:
 - SIRS eFile ID
 - Session Conducted By
 - MIPPA
 - Send to SMP
 - SIRS eFile ID
 - SIRS Reference Number
 - SHIP Reference Number
 - Partner Organization Affiliation
 - Time Spent in Hours
 - Time Spent in Minutes
 - Total Time Spent (Minutes)

The last change ACL would like to propose is a name change for the current Resource Report Form. The Team Member Form would replace the current Resource Report Form. The form is very similar. But has fewer questions. A description of the change to the form is below.

- Resource Report Form
 - The information collected in the two forms is identical with the exception of the Counselor Trainings section, which has been eliminated. It is ACL's intention to develop a completely new training form in the next year to expand the information collected in this element. ACL will submit a separate request for the new form when the collection tool is created.

Burden Hour Estimates:

ACL has also recalculated the burden hours for the proposed changes. ACL has reached its estimation based on a Booz Allen Hamilton (BAH) analysis of the current data system. BAH conducted several tests in the current system to ensure proper design of the new SHIP data system. Through the proper testing and vetting of the current data system BAH was able to design a system that would surpass the past performance of the of the current data system and allow for an efficient transfer of data. These changes, will reduce the burden for the program by almost 1/3 of the current burden. ACL has illustrated the change in burden in a comparison table that explicitly shows the differences in burden by the different forms. The first table is the currently approved burden hours for the below forms:

- Client Contact Form
- Public and Media Activity Report Form
- Resource Report Form

Responses	Client Contact Form	Public and Media Activity Report Form	Resource Report Form	Summary
Expected Responses	3,600,000	98,000	54	3,698,054
Overall Hours Per Submission	0.08833	0.08833	4	NA
Annual Burden Hours	317,988	8,656.34	216	326,860.34

In Table A, ACL has listed the Team Member Form twice; this is due to the initialing phase of the SHIP database. The SHIP will load roughly 20,000 of its volunteers and counselors onto the modernized SHIP data system in year one. On average, the SHIP has a high retention rate and usually on-boards about 2,000 new volunteers annually. The Team Member Form, labeled with the addition sign by 2018 (+), illustrates how the new form will affect the future burden after the initial phase. Both ‘Media Outreach & Education Form and Group Outreach & Education Form’ columns expected response totals are from the total expected responses from the ‘Public and Media Activity’ section of the previous approved table.

Table A. Proposed Summary of Burden Hours by Form Type

Responses	Beneficiary (Client) Form	Media Outreach & Education Form	Group Outreach & Education Form	Team Member Form 2018	Team Member Form 2018(+)	Summary
Expected Responses ²	3,600,000	49,000	49,000	20,000	2,000	3,718,000 CY2018 3,700,000

						(CY2019)
Overall Hours Per Submission³	0.058333	0.044165	0.044165	0.044165	0.044165	NA
Annual Burden Hours⁴	209,988	2,164.085	2,164.085	883.3	88.33	215,199.47 (CY2018) 214,404.50 (CY2019)

In order to remain on schedule for the system development, ACL would greatly appreciate receiving a response to this request as soon as possible. The changes represent a reduction in burden hours and, based on feedback from the development team and program staff, the revisions would greatly improve the usefulness of the data collected.

² The Expected Response calculation is (Beneficiary (Client) form) + (Media Outreach Form) (Group Outreach Form) + (Team Member Form) will equal the total found in the summary column.

³ Overall Hours Per Submission is not tallied for a total because the user has the option of selecting the forms that pertains to the activity.

⁴ Annual Burden Hours calculation is (Beneficiary (Client) Form) + (Media Outreach Form) (Group Outreach Form) + (Team Member Form) and will equal the total found in the summary column. [Should this refer to the Media Outreach & Education form and Group Outreach & Education form? Should there be a "+" sign between the two?