

**Justification for Non-Substantive Change for  
Redetermination of Eligibility for Extra Help  
With Medicare Prescription Drug Plan Costs  
Forms SSA-1026-REDE  
(Social Security Administration Review of Your Eligibility for Extra  
Help)  
And  
SSA-1026-SCE  
(Social Security Administration Reporting a Change That May Affect  
Your Extra Help)  
20 CFR 418.3125  
OMB No. 0960-0723**

SSA was unable to make the proposed changes prior to the previous submission of the clearance package, because the development of the proposed changes did not materialize until after the previous submission cleared. Furthermore, SSA needs to update the Redetermination/Subsidy Change Event (SAAI) and the Medicare Query (MEDQ) screens in the Medicare Application Processing System (MAPS), because delays in replacing the SSN with the new MBI may incur legal risks or impede routine interagency business functions.

Public law 108-173, also known as the Medicare Prescription Drug, Improvement and Modernization Act of 2003 (MMA), amended Title XVIII of the Social Security Act (Act) to establish a subsidy program to help certain individuals with limited income and resources pay for Medicare Part D prescription drug coverage. We commonly refer to this subsidy program as Extra Help. Extra Help eligibility criteria is section 1860D-14 of the Act. Section 1860D-14(a)(3)(B)(iv)(II) of the Act requires the Commissioner of the Social Security Administration (SSA) to establish a mechanism for individuals to appeal subsidy eligibility determinations using procedures described in Section 1631(c)(1)(A). SSA uses Form SSA-1021, Appeal of Determination for Help with Medicare Prescription Drug Plan Costs, to obtain information from individuals who appeal SSA's decisions regarding eligibility or continuing eligibility for a Medicare Part D subsidy. SSA uses several modalities, including paper, PDF, and an Intranet application to collect the information on Form SSA-1021. A fillable PDF version of Form SSA 1021, which respondents can fill out, print, and mail to SSA, is available on SSA's Internet website. In addition, SSA employees input the information into the Intranet MAPS through an interview process with the respondents.

The MAPS is accessible via a direct link from the I-Main (Intranet Main Menu) screen and primarily interfaces with Subsidy Determinations and CPMS system logic providing the means to complete an SSA-1021 (appeal) form. The MEDQ works in conjunction with MAPS displaying a complete history of all Medicare actions including Prescription Drug Plan Subsidy applications processed via MAPS. The Medicare Access and CHIP Reauthorization Act (MACRA) legislation mandates the removal of Social Security Numbers (SSNs) from Medicare cards no later than four years from enactment of the MACRA legislation. The primary goal of the MACRA is to decrease Medicare beneficiary vulnerability to identity theft. The Center for Medicare and Medicaid Services (CMS) intends to replace the Health Insurance Claim Number

(HICN) with a new, randomly generated Medicare Beneficiary Identifier (MBI). To implement this change, CMS collaborated with SSA to address systems and processes that affect implementation of legislative requirements. This action does not affect the public reporting burden.

### **Revision to the Information Collection**

- **Change #1:** We are replacing the applicant and spouse's Medicare Claim Number with the applicant and spouse's MBI, on the MAPS 1026 SAAI screen, under the Application Information section.

**Justification #1:** The MACRA of 2015 legislation mandates the removal of the SSN-based HICN from all Medicare cards. SSA will require modification to its systems and processes to accommodate the new Medicare Beneficiary Identifier (MBI).

- **Change #2:** We are replacing the applicant and spouse's Medicare Claim Number with the applicant and spouse's MBI on the Appeal Input Screen (APIS).

**Justification #2:** The MACRA of 2015 legislation mandates the removal of the SSN-based HICN from all Medicare cards. SSA will require modification to its systems and processes to accommodate the new MBI.

- **Change #3:** We are replacing the applicant and spouse's Medicare Claim Number with the applicant and spouse's MBI on the Appeals Results Screen (APRS).

**Justification #3:** The MACRA of 2015 legislation mandates the removal of the SSN-based HICN from all Medicare cards. SSA will require modification to its systems and processes to accommodate the new MBI.

- **Change 4:** We are replacing the applicant and spouse's Medicare Claim Number with the applicant and spouse's MBI on the MEDQ's QDIS screen; the main page; in tabs labeled 'Part A', 'Part B', 'Part C' under the Client Data section; and in tabs labeled 'Part D' and 'All' under the Applicant Data section.

**Justification 4:** The MACRA of 2015 legislation mandates the removal of the SSN-based HICN from all Medicare cards. SSA will require modification to its systems and processes to accommodate the new MBI.

The SSA will implement the above changes upon OMB approval.