

**Justification for Non-Substantive Change for Form SSA-1020/i1020
Application for Extra Help with Medicare Prescription Drug Plan Costs
OMB No. 0960-0696**

Revision to the Information Collection

Background:

The Medicare Prescription Drug, Improvement, and Modernization Act of 2003 (MMA) established a Medicare Part D program for voluntary prescription drug coverage of premium, deductible, and co-payment costs for certain low-income individuals. The MMA mandates the availability of subsidies for individuals who qualify for the program and meet eligibility criteria for help with premium, deductible, and co-payment costs. Section 1860D-14 of the Social Security Act, as codified in 20 CFR 418.3101 of the Code of Federal Regulations, discusses the subsidy eligibility criteria. SSA uses paper Form SSA-1020 and the electronic i1020, Applications for Extra Help with Medicare Prescription Drug Plan Costs, to collect necessary income and resource information from Medicare beneficiaries to make Part D subsidy eligibility determinations. Respondents can complete the paper form, or a field office representative can assist respondents with completing the form by entering information into the SSA Intranet application Medicare Application Processing System (MAPS) during an in-office or telephone interview.

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-1020 (initial Medicare Part D subsidy application) form. The Medicare Query (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.

We are making the following revisions to our Medicare Application Processing System (MAPS) screens to comply with the Medicare Access and CHIP Reauthorization Act (MACRA) of 2015 legislation:

- **Change #1:** On MEDQ's QDIS screen, we will replace the applicant and spouse's Medicare Claim Number with the applicant and spouse's Medicare Beneficiary Identifier (MBI) on the main page and 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 #1: The Medicare Access and CHIP Reauthorization Act (MACRA) of 2015

legislation mandates the removal of the SSN-based Health Insurance Claim Number (HICN) from all Medicare cards. SSA is modifying our systems and processes to accommodate the new Medicare Beneficiary Identifier (MBI).

- **Change #2:** On the MAPS 1026 Redetermination/Subsidy Change Event (SAAI) screen, under the Application Information section, we will replace the applicant and spouse's Medicare Claim Number with the applicant and spouse's Medicare Beneficiary Identifier (MBI).

Justification #2: The Medicare Access and CHIP Reauthorization Act (MACRA) of 2015 legislation mandates the removal of the SSN-based Health Insurance Claim Number (HICN) from all Medicare cards. SSA is modifying our systems and processes to accommodate the new Medicare Beneficiary Identifier (MBI).

- **Change #3:** On the Appeal Input Screen (APIS), we will replace the applicant and spouse's Medicare Claim Number with the applicant and spouse's Medicare Beneficiary Identifier (MBI).

Justification #3: The Medicare Access and CHIP Reauthorization Act (MACRA) of 2015 legislation mandates the removal of the SSN-based Health Insurance Claim Number (HICN) from all Medicare cards. SSA is modifying our systems and processes to accommodate the new Medicare Beneficiary Identifier (MBI).

- **Change #4:** On the Appeals Results Screen (APRS), we will replace the applicant and spouse's Medicare Claim number with the applicant and spouse's Medicare Beneficiary Identifier (MBI).

Justification #4: The Medicare Access and CHIP Reauthorization Act (MACRA) of 2015 legislation mandates the removal of the SSN-based Health Insurance Claim Number (HICN) from all Medicare cards. SSA is modifying our systems and processes to accommodate the new Medicare Beneficiary Identifier (MBI).

SSA will implement the above changes on 1/26/2019, after we receive OMB approval.

Justification for Resubmission of the Collection within One Year of OMB Approval

SSA was unable to make the proposed changes prior to OMB's approval of our previous information collection request submission, because we had not yet developed the proposed changes until after we received the previous approval. Furthermore, SSA needs to update SAAI and MEDQ screens in MAPS because delays in replacing the SSN with the new MBI may incur legal risks or impede routine interagency business functions.

This action does not affect the public reporting burden.