

Supporting Statement – Part A
Review and Approval Process for Waivers for State Innovation
CMS-10383/OMB control number# 0938-NEW

A. Background

Section 1332 of the Patient Protection and Affordable Care Act (PPACA) establishes authority for a “Waiver for State Innovation.” Under this section, states can apply for a waiver—effective for plan years beginning on or after January 1, 2017—of the PPACA requirements such as qualified health plans, Exchanges, cost-sharing reductions¹, premium tax credits, the individual responsibility requirement, and shared responsibility for employers. The PPACA requires that the U.S. Department of Health and Human Services (HHS) and the U.S. Department of the Treasury (Treasury)—collectively known as the Departments—issue regulations regarding procedures for section 1332 waivers.

Under this section, the secretaries are required to establish a process for the submission of an application for a section 1332 State Innovation waiver (also now referred to as a State Relief and Empowerment Waiver or section 1332 waiver), including a process for public notice and comment at the state and federal levels that is sufficient to ensure a meaningful level of public input. The secretaries are also required to establish reporting requirements for states and a process for the periodic evaluation of approved waivers. This information collection request would establish requirements pertaining to the provisions required under section 1332 of the PPACA.

B. Justification

1. Need and Legal Basis

The information required under this collection is necessary to ensure that states comply with statutory and regulatory requirements related to the development and implementation of section 1332 waivers. States seeking waiver authority under section 1332 of the PPACA are required to meet certain requirements for applications, public notice, and reporting. The authority for these requirements is found in section 1332 of the PPACA. This information collection reflects the requirements provided in the final rules published in February 2012. Additionally, on October 24, 2018, the Departments published guidance that provides supplementary information about the requirements that must be met for the approval of a section 1332 waiver, the Secretaries' application review procedures, the calculation of pass-through funding, certain analytical requirements, and operational considerations.² This guidance supersedes the guidance related to section 1332 of the PPACA that was previously published on December 16, 2015. This information collection also reflects the requirements outlined in a state's specific terms and

¹ So long as there is no available appropriation to support federal CSR payments, states may not receive pass-through funds based on federal savings in CSR payments.

² 83 FR 53575; <https://www.federalregister.gov/documents/2018/10/24/2018-23182/state-relief-and-empowerment-waivers>

conditions (STCs), as part of the approval of a state’s section 1332 waiver application.

2. Information Users

The information required is used by the Departments when evaluating waiver proposals for approval or disapproval and for approved waivers to determine compliance with section 1332 of the PPACA. The Departments review waiver applications to determine whether a proposed waiver program would meet the statutory guardrails. The application data and narrative inform the Departments’ determination on whether to approve a waiver program.

Monitoring and compliance data—including various quarterly, annual, and periodic reporting—is used by the Departments to maintain oversight over states. The reports include both qualitative and quantitative data to provide updates on the state of the waiver program and, as applicable, inform pass-through funding calculations. Reporting forms collect data as prescribed in the regulation and the state’s STCs. The Departments review this information to confirm state compliance with statutory guardrails and grantee requirements.

3. Use of Information Technology

States submit their waiver applications, as well as any supporting documentation or information, electronically to an established 1332 mailbox and/or CCIIO staff. Quarterly and annual reports, as well as grant required reports, are submitted electronically using online reporting functionality through the GrantSolutions system.

4. Duplication of Efforts

This information collection does not duplicate any current information collection.

5. Small Businesses

This information collection does not impact small businesses or other small entities.

6. Less Frequent Collection

Close monitoring will be critical to ensuring that states receive prompt federal guidance and technical assistance that is responsive to any state-specific issues that may arise, and that state activities meet statutory and other federal requirements. In the absence of regular reporting, there is a risk that states could invest resources and conduct activities that are not aligned with requirements. As such, HHS or Treasury (depending on the scope of the waiver) will be in close contact with awardees. Reporting is outlined in section 1332 regulations and the STCs. HHS may look for opportunities, however, to streamline reporting, such as combining fourth quarter reporting with annual reporting.

7. Special Circumstances

No special circumstances exist for this information collection.

8. **Federal Register/Outside Consultation**

A 60-day Notice published in the Federal Register on August 12, 2019 (84 FR 39851). Comments are included and responded to in Appendix A.

9. **Payments/Gifts to Respondents**

There is no payment or gift to respondents.

10. **Confidentiality**

The information received by HHS is not confidential and will be made publicly available, in whole or in part, in order to comply with statutory requirements designed to promote transparency in the review and approval of section 1332 waivers.

11. **Sensitive Questions**

There are no sensitive questions included in this collection effort. HHS does not propose to collect any private information.

12. **Burden Estimates (Hours & Wages)**

Wage Rate Data

Average labor costs (doubled to include fringe benefits and other associated costs) are calculated using data available from the Bureau of Labor Statistics (BLS).³ The Centers for Medicare & Medicaid Services (CMS) used the May 2018 BLS's most recent wage estimates available on the BLS website at the following link (https://www.bls.gov/oes/current/oes_nat.htm) as the basis for standard mean hourly wages to calculate the burden costs. As indicated, we are adjusting the employee mean hourly wage estimates by a factor of 100 percent to account for benefits and overhead. Table 12.1 below details the occupation titles and associated hourly wages from BLS used in the burden calculations.

Table 12.1 National Occupational Employment and Adjusted Hourly Wages Used in Burden Estimates

BLS Occupation Title	Occupational Code	Mean Hourly Wage (\$/hr)	Fringe Benefits and Overhead (\$/hr)	Adjusted Hourly Wage (\$/hr)
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³ BLS Employer Costs for Employee Compensation—September 2018

Actuaries	15-2011	\$55.21	\$55.21	\$110.42
Management Analysts	13-1110	\$44.92	\$44.92	\$89.84
Financial Analysts	13-2051	\$47.80	\$47.80	\$95.60
Network and Computer Systems Administrators	15-1142	\$41.51	\$41.51	\$83.02
Information Security Analysts	15-1122	\$47.93	\$47.93	\$95.86
General and Operations Managers	11-1020	\$59.35	\$59.35	\$118.70

The Departments have approved eight section 1332 waivers to date and anticipate an average of four new applicants each year. As such, we have used 12 respondents for all annual requirements. We have used four respondents for any requirements that only occur in the first year of the waiver, including the application for a section 1332 waiver. The number of responses per respondent is one unless otherwise noted to reflect the recurrence of a requirement over the course of a waiver year, as per regulation or STCs.

Coordinated Waiver Process and (31 CFR 33.102 and 45 CFR 155.1302) and Application Procedures (31 CFR 33.108 and 45 CFR 155.1308)

Under certain conditions, 31 CFR 33.102 and 45 CFR 155.1302(a) and (b) provide that a state may submit a single application for a waiver under section 1332 of the PPACA and a waiver under one or more of the existing waiver processes applicable under titles XVIII, XIX, and XXI of the PPACA, or under any other federal law relating to the provision of health care items or services. 31 CFR 33.108 and 45 CFR 155.1308 of the regulations establish the application process for section 1332 waivers. Under 31 CFR 33.108(a) and 45 CFR 155.1308(a), a state's application for approval of a section 1332 waiver must be submitted to the secretary as an electronic document. Paragraph (f) of 31 CFR 33.108 and 45 CFR 155.1308 specifies that an application for a section 1332 waiver will not be considered complete unless the application meets all of the conditions set out in those sections. The burden associated with the requirements in 31 CFR 33.102 and 33.108 and 45 CFR 155.1302 and 155.1308 is the time and effort necessary for a state to develop and submit a complete application for a section 1332 waiver.

Table 12.2 Annualized Cost Estimate for States Completing Application

CMS estimates that it will take approximately **390 hours** per applicant to develop and submit a complete application to HHS, at a cost of approximately **\$37,508.40 per applicant**. For states completing an application, we estimate that it will require 300 hours for a management analyst (at a cost of \$45.38 per hour) to prepare the application and 60 hours for an actuary (at a cost of \$55.89 per hour) to contribute to the application. We also estimate it will require 30 hours for a senior manager (at a cost of \$59.56 per hour) to review the application. The total annualized burden for four applicants is **1560 hours** and **\$150,033.60**.

Type of respondent	Number of Respondents	Number of Responses per Respondent	Average Burden Hours	Wage per Hour (incl fringe)	Burden Costs
Management Analysts	4	1	300	\$90.76	\$108,912.00
Actuaries	4	1	60	\$111.78	\$26,827.20
Senior Manager	4	1	30	\$119.12	\$14,294.40
Total – Annual			390		\$150,033.60
Total - Three Years					\$450,100.80

State Public Notice Requirements (31 CFR 33.112 and 45 CFR 155.1312)

Paragraph (a) of 31 CFR 33.112 and 45 CFR 155.1312 of the regulations require a state to provide a public notice and comment period prior to submitting an application for a section 1332 waiver. The public notice must address the information requirements listed in paragraphs (b)(1) through (4) of 31 CFR 33.112 and 45 CFR 155.1312.

Paragraph (c) of 31 CFR 33.112 and 45 CFR 155.1312 specify that after issuing the public notice and prior to submitting an application for a section 1332 waiver, a state must conduct public hearings regarding the state's waiver application.

The burden estimate associated with this requirement is the time and effort necessary to develop and publish a public notice that complies with the aforementioned information requirements and hold a public forum.

Table 12.3 Annualized Cost Estimate for States Completing Application Public Notice Requirement

CMS estimates that it will take approximately **27 hours** per applicant to comply with the public notice and forum requirements, at a cost of approximately **\$2,578.24** per applicant. For states completing an application, we estimate that it will require 20 hours for a management analyst (at a cost of \$45.38 per hour) to prepare the public notice hold a public forum and 2 hours for a network and computer systems administrator (at a cost of \$41.86 per hour) to post the public notice. We also estimate it will require 5 hours for a senior manager (at a cost of \$59.56 per hour) to review the public notice and participate in the public forum. The total annualized burden for four applicants is **108 hours** and **\$10,312.96**.

Type of respondent	Number of Respondents	Number of Responses per Respondent	Average Burden Hours Per Response	Wage per Hour (incl fringe)	Burden Costs
Senior Management	4	1	5	\$119.12	\$2,382.40
Management Analysts	4	1	20	\$90.76	\$7,260.80
Network and Computer Systems Administrators	4	1	2	\$83.72	\$669.76
Total - Annual			27		\$10,312.96
Total - Three Years					\$30,938.88

Paragraph (a)(2) of 31 CFR 33.112 and 45 CFR 155.1312 require states with one or more Federally-recognized Indian tribes to consult with such tribes before submitting a section 1332 waiver application. Paragraph (f)(2) of 31 CFR 33.108 and 45 CFR 155.1308 explains that documentation of the state’s public notice, which incorporates this consultation, must be included in the waiver application. The burden associated with these requirements is both the time and effort necessary for a state to conduct its tribal consultations and the time and effort necessary to notify CMS of the state’s compliance with paragraph (f)(2) of 31 CFR 33.108 and 45 CFR 155.1308.

Table 12.4 Annualized Cost Estimate for States Completing Tribal Consultation Requirement

CMS estimates that it will take approximately **eight hours** per applicant to comply with the tribal consultation requirements at a cost of approximately **\$839.52** per applicant. For states completing an application, we estimate that it will require 4 hours for a management analyst (at a cost of \$45.38 per hour) to conduct tribal consultation. We also estimate it will require 4 hours for a senior manager (at a cost of \$59.56 per hour) to oversee and review a tribal consultation. The total annualized burden for four applicants is **32 hours** and **\$3,358.08**.

Type of respondent	Number of Respondents	Number of Responses per Respondent	Average Burden Hours Per Response	Wage per Hour (incl fringe)	Burden Costs
Senior Management	4	1	4	\$119.12	\$1,905.92
Management Analysts	4	1	4	\$90.76	\$1,452.16
Total - Annual			8		\$3,358.08
Total - Three Years					\$10,074.24

Monitoring and Compliance (31 CFR 33.120 and 45 CFR 155.1320)

a. Periodic State Internal Implementation Reviews

31 CFR 33.120(b) and 45 CFR 155.1320(b) of the regulations require states to periodically perform internal reviews of the implementation of an approved section 1332 waiver.

The burden associated with this reporting requirement is the time and effort necessary for a state to periodically review the waiver’s implementation internally.

Table 12.5 Annualized Cost for Periodic State Internal Implementation Reviews

CMS estimates that it will take approximately **20 hours** per state to periodically review the waiver’s implementation, at a cost of approximately **\$1,988.70** per applicant. For those states, we estimate that it will require 10 hours for a management analyst (at a cost of \$45.38 per hour) to conduct the periodic internal implementation review and 5 hours for a financial analyst (at a cost of \$48.55 per hour) to contribute to the implementation review. We also estimate it will require 5 hours for a senior manager (at a cost of \$59.56 per hour) to oversee the implementation review. The total annualized burden for 12 states is **240 hours** and **\$23,864.40**.

Type of respondent	Number of Respondents	Number of Responses per Respondent	Average Burden Hours	Wage per Hour (incl fringe)	Burden Costs
Management Analysts	12	1	10	\$90.76	\$10,891.20
Financial Analyst	12	1	5	\$97.10	\$5,826.00
Senior Management	12	1	5	\$119.12	\$7,147.20
Total - Annual			20		\$23,864.40
Total - Three Years					\$71,593.20

b. Reinsurance Reports

31 CFR 33.120(b) and 45 CFR 155.1320(b) specify that states must complete a periodic review related to the implementation of the waiver. Per the STCs, the state must submit a one-time report by February 28th of the first year of the waiver, to include details on the operation of the waiver program, including a plan for processing claims.

The burden associated with this reporting requirement is the time and effort necessary to submit the reinsurance report to CMS.

Table 12.6 Annualized Cost for Reinsurance Periodic Reports

CMS estimates that it will take approximately **five hours** per state to assemble, review, finalize, and submit each reinsurance periodic report at a cost of approximately **\$482.16** per applicant. For those states, we estimate that it will require 4 hours for a management analyst (at a cost of \$45.38 per hour) to prepare the report. We also estimate it will require 1 hour for a senior manager (at a cost of \$59.56 per hour) to review the report. The total annualized burden for four states is **20 hours** and **\$1,928.64**.

Type of respondent	Number of Respondents	Number of Responses per Respondent	Average Burden Hours	Wage per Hour (incl fringe)	Burden Costs
Management Analysts	4	1	4	\$90.76	\$1,452.16
Senior Management	4	1	1	\$119.12	\$476.48
Total - Annual			5		\$1,928.64
Total - Three Years					\$5,785.92

c. Post-Award Public Forum

Paragraph (c) of 31 CFR 33.120 and 45 CFR 155.1320 of the regulations further specifies that at least six months after the implementation date of the waiver, and annually thereafter, the state must hold a public forum to solicit comments on the progress of a section 1332 waiver. As specified in paragraph (c)(1) of 31 CFR 33.120 and 45 CFR 155.1320, the state must publish the date, time, and location of the public forum in a prominent location on the state’s public web site at least 30 days prior to the date of the planned public forum.

The burden associated with these provisions includes the time and effort necessary to conduct the public meeting and the time and effort necessary for a state to publish the date, time, and location of the public forum in a prominent location on the state’s public web site at least 30 days prior to the date of the planned public forum.

Table 12.7 Annualized Cost for Post-award Public Forum

CMS estimates that it will take approximately **12 hours** per state to hold a public forum at a cost of approximately **\$1,115.88** per applicant. For those states, we estimate that it will require 8 hours for a management analyst (at a cost of \$45.38 per hour) to prepare for and hold the post-award public forum and 2 hours for a financial analyst (at a cost of \$48.55 per hour) to contribute to and participate in the public forum. We also estimate it will require 2 hours for a senior manager (at a cost of \$59.56 per hour) to participate in the public forum. The total annualized burden for 12 states is **144 hours** and **\$13,390.56**.

Type of respondent	Number of Respondents	Number of Responses per Respondent	Average Burden Hours	Wage per Hour (incl fringe)	Burden Costs
Management Analysts	12	1	8	\$90.76	\$8,712.96
Financial Analyst	12	1	2	\$75.78	\$1,818.72
Senior Management	12	1	2	\$119.12	\$2,858.88
Total - Annual			12		\$13,390.56
Total - Three Years					\$40,171.68

State Reporting Requirements (31 CFR 33.124 and 45 CFR 155.1324)

a. Quarterly Reporting

Paragraph (a) of 31 CFR 33.124 and 45 CFR 155.1324 requires states to submit quarterly reports to CMS in accordance with the STCs. These quarterly reports must include, but are not limited to, reports of any ongoing operational challenges and plans for and results of associated corrective actions. The burden associated with this reporting requirement is the time and effort necessary to prepare and submit quarterly reports to CMS.

Table 12.8 Annualized Cost Estimate for State Quarterly Reporting

CMS estimates that it will take approximately **12 hours** per state to assemble, review, finalize, and submit each quarterly report to the Departments, at a cost of approximately **\$3,437.52** per state. States submit three quarterly reports each year (the fourth quarter is included with the annual report) for a total of 36 hours per year. For those states, we estimate that it will require 10 hours for a management analyst (at a cost of \$45.38 per hour) to prepare the report. We also estimate it will require 2 hours for a senior manager (at a cost of \$59.56 per hour) to review the report. The total annualized burden for 12 states is **432 hours** and **\$41,250.24**.

Type of respondent	Number of Respondents	Number of Responses per Respondent	Average Burden Hours	Wage per Hour (incl fringe)	Burden Costs
Management Analysts	12	3	10	\$90.76	\$32,673.60
Senior Management	12	3	2	\$119.12	\$8,576.64
Total - Annual			36		\$41,250.24

Type of respondent	Number of Respondents	Number of Responses per Respondent	Average Burden Hours	Wage per Hour (incl fringe)	Burden Costs
Total - Three Years					\$123,750.72

b. Annual Reporting

Paragraph (b) of 31 CFR 33.124 and 45 CFR 155.1324 of the regulations requires states to submit annual reports to CMS documenting the information listed in paragraph (b)(1) through (4) of 31 CFR 33.124 and 45 CFR 155.1324. As part of the submission process, paragraph (c) of 31 CFR 33.124 and 45 CFR 155.1324 requires states to submit draft annual reports to CMS no later than 90 days after the end of each waiver year, or as specified in the STCs. Paragraph (c)(2) of 31 CFR 33.124 and 45 CFR 155.1324 of the regulations specifies that the draft and final annual reports must be published on the state’s public web site. The burden associated with this reporting requirement is the time and effort necessary to prepare and submit draft and final annual reports to CMS and the time and effort required for a state to post the aforementioned information on the state’s public web site.

Table 12.9 Annualized Cost Estimate for State Annual Reporting

CMS estimates that it will take approximately **35 hours** per applicant to assemble, review, finalize, and submit each annual report to the Departments and post the report to the state’s public web site at a cost of approximately **\$3,528.60** per state. For those states, we estimate that it will require 20 hours for a management analyst (at a cost of \$45.38 per hour) to prepare the report and 10 hours for an actuary (at a cost of \$55.89 per hour) to contribute to the report. We also estimate it will require 5 hours for a senior manager (at a cost of \$59.56 per hour) to review the report. The total annualized burden for 12 states is **420 hours** and **\$42,343.20**.

Type of respondent	Number of Respondents	Number of Responses per Respondent	Average Burden Hours	Wage per Hour (incl fringe)	Burden Costs
Management Analysts	12	1	20	\$90.76	\$21,782.40
Actuaries	12	1	10	\$111.78	\$13,413.60
Senior Management	12	1	5	\$119.12	\$7,147.20
Total - Annual			35		\$42,343.20
Total - Three Years					\$127,029.60

c. Pass-through Funding Reports

[42 U.S. Code 18052] Section 1332(a)(3) specifies that states shall receive pass-through funding annually, as determined by the Secretary. The STCs detail the requirement for states to submit pass-through funding reports to CMS to inform this determination each year.

The burden associated with this reporting requirement is the time and effort necessary to submit pass-through funding reports to CMS.

Table 12.10 Annualized Cost for Pass-through Funding Reports

CMS estimates that it will take approximately **45 hours** per applicant to assemble, review, finalize, and submit each pass-through funding report, at a cost of approximately **\$4,595.02** per state. For those states, we estimate that it will require 20 hours for a management analyst (at a cost of \$45.38 per hour) to prepare the report, 5 hours for a financial analyst (at a cost of \$48.55 per hour) and 12 hours for an actuary (at a cost of \$55.89 per hour) to contribute to the report. We also estimate it will require 8 hours for a senior manager (at a cost of \$59.56 per hour) to review the report. The total annualized burden for 12 states is **540 hours** and **\$55,140.24**.

Type of respondent	Number of Respondents	Number of Responses per Respondent	Average Burden Hours	Wage per Hour (incl fringe)	Burden Costs
Management Analysts	12	1	20	\$90.76	\$21,782.40
Financial Analyst	12	1	5	\$97.10	\$5,826.00
Actuaries	12	1	12	\$111.78	\$16,096.32
Senior Management	12	1	8	\$119.12	\$11,435.52
Total - Annual			45		\$55,140.24
Total - Three Years					\$165,420.72

d. Grant Reporting

The HHS Grants Policy Statement requires grantees to comply with fiscal and budgetary reporting requirements and the STCs (including quarterly SF-424 reports and an annual SF-425 report).

The burden associated with this reporting requirement is the time and effort necessary to submit grant reports to CMS.

Table 12.11 Annualized Cost for Grant Reporting

CMS estimates that it will take approximately **four hours** per state to assemble, review, finalize,

and submit each grant report, at a cost of approximately **\$2,023.90** per state. With five grant reports submitted per year, the total burden per state each year is **20 hours**. For those states, we estimate that it will require 1 hour for a management analyst (at a cost of \$45.38 per hour) to prepare the report and 1 hour for an accountant or auditor (at a cost of \$37.89 per hour) to contribute to the report. We also estimate it will require 2 hours for a senior manager (at a cost of \$59.56 per hour) to review the report. The total annualized burden for 12 grantees is **240 hours** and **\$24,286.80**.

Type of respondent	Number of Respondents	Number of Responses per Respondent	Average Burden Hours	Wage per Hour (incl fringe)	Burden Costs
Management Analysts	12	5	1	\$90.76	\$5,445.60
Accountant and Auditors	12	5	1	\$75.78	\$4,546.80
Senior Management	12	5	2	\$119.12	\$14,294.40
Total - Annual			20		\$24,286.80
Total - Three Years					\$72,860.40

Periodic Evaluation Requirements (31 CFR 33.128 and 45 CFR 155.1328)

a. Federal Periodic Review

31 CFR 33.128 and 45 CFR 155.1328 specify that the Departments' secretaries shall periodically evaluate the implementation of section 1332 waivers.

The burden associated with this reporting requirement is the time and effort necessary for the state to prepare for and participate in virtual meeting(s) with the Departments to periodically evaluate the waiver's implementation, the state's most recently submitted annual report, and any operational issues or challenges and need for technical assistance.

Table 12.12 Annualized Cost for Federal Periodic Review

CMS estimates that it will take approximately **15 hours** per applicant to periodically evaluate the waiver's implementation, at a cost of approximately **\$1,503.20** per state. For those states, we estimate that it will require 10 hours for a management analyst (at a cost of \$45.38 per hour) to prepare for and participate in the evaluation. We also estimate it will require 5 hours for a senior manager (at a cost of \$59.56 per hour) to prepare for and participate in the evaluation. The total annualized burden for 12 states is **180 hours** and **\$18,038.40**.

Type of respondent	Number of Respondents	Number of Responses per Respondent	Average Burden Hours	Wage per Hour (incl fringe)	Burden Costs
Management Analysts	12	1	10	\$90.76	\$10,891.20
Senior Management	12	1	5	\$119.12	\$7,147.20
Total - Annual			15		\$18,038.40
Total - Three Years					\$53,708.40

b. Monitoring Calls

The STCs specify that states must participate in monitoring calls with the Departments that the Departments deem necessary. The purpose of these calls is to discuss any significant actual or anticipated developments affecting the waiver, typically identified in state-submitted reports.

The burden associated with this reporting requirement is the time and effort necessary to hold monitoring calls with CMS.

Table 12.13 Annualized Cost for Monitoring Calls

CMS estimates that it will take approximately **three hours** per applicant to prepare for and hold each monitoring call, at a cost of approximately **\$901.92** per state. We anticipate states being asked to participate in three grantee monitoring calls per year, for a total of 9 burden hours. For those states, we estimate that it will require 2 hours for a management analyst (at a cost of \$45.38 per hour) to prepare for and participate in each call. We also estimate it will require 1 hour for a senior manager (at a cost of \$59.56 per hour) to prepare for and participate in each call. The total annualized burden for 12 states is **108 hours** and **\$10,823.04**.

Type of respondent	Number of Respondents	Number of Responses per Respondent	Average Burden Hours	Wage per Hour (incl fringe)	Burden Costs
Management Analysts	12	3	2	\$90.76	\$6,534.72
Senior Management	12	3	1	\$119.12	\$4,288.32
Total - Annual			9		\$10,823.04
Total - Three Years					\$32,469.12

Reinsurance Payment Schedule

31 CFR 33.128 and 45 CFR 155.1328 specify that the Departments’ secretaries shall periodically evaluate the implementation of section 1332 waivers. The STCs require states with reinsurance waivers to submit a payment schedule by January 1st of the first year of their waiver.

The burden associated with this reporting requirement is the time and effort necessary to submit reinsurance payment schedules to CMS.

Table 12.14 Annualized Cost for Reinsurance Payment Schedule

CMS estimates that it will take approximately **seven hours** per state to assemble, review, finalize, and submit each reinsurance payment schedule at a cost of approximately **\$676.36** per states. For those states, we estimate that it will require 4 hours for a management analyst (at a cost of \$45.38 per hour) to prepare the reinsurance payment schedule and 2 hours for a financial analyst (at a cost of \$48.55 per hour) to contribute to the payment schedule. We also estimate it will require 1 hour for a senior manager (at a cost of \$59.56 per hour) to review the payment schedule. The total annualized burden for four states is **28 hours** and **\$2,705.44**.

Type of respondent	Number of Respondents	Number of Responses per Respondent	Average Burden Hours	Wage per Hour (incl fringe)	Burden Costs
Management Analysts	4	1	4	\$90.76	\$1,452.16
Financial Analyst	4	1	2	\$97.10	\$776.80
Senior Management	4	1	1	\$119.12	\$476.48
Total - Annual			7		\$2,705.44
Total - Three Years					\$8,116.32

Table 12.15 Summary of Burden

Table 12.15 summarizes the estimated overall burden to states participating in this program. The estimated annualized burden specified in this information collection is **4,016 hours** for a total of **12,048 burden hours** and **\$1,181,413.68** in burden cost across three years. This also the sum of total burden cost across program activities, as laid out in Tables 12.2-12.14.

Requirement	Type of Respondent	Number of Respondents	Number of Responses per Respondent	Estimated Burden hours per Response	Total Estimated Burden Hours
Waiver Application	State Government	4	1	390	1560
Public Notice and Forum	State Government	4	1	27	108
Tribal Notice	State Government	4	1	8	32
Quarterly Reports	State Government	12	3	12	432
Annual Report	State Government	12	1	35	420
Federal Periodic Evaluations	Federal Government	12	1	15	180
Reinsurance Periodic Reports	State Government	4	1	5	20
Pass Through Funding Reports	State Government	12	1	45	540
State Implementation Reviews	State Government	12	1	20	240
Annual Post-award Public Forums	State Government	12	1	12	144
Grant Reporting	State Government	12	5	4	240
Monitoring Calls	State Government	12	3	3	108
Reinsurance Payment Schedule	Federal Government	4	1	7	28
Total - Annual					4,016
Total - Three Year					12,048

13. **Capital Costs**

There are no capital costs associated with this collection.

14. **Cost to Federal Government**

There are no costs to the Federal government.

15. **Changes to Burden**

This is a new information collection.

16. Publication/Tabulation Dates

State waiver application packages are published on the CCIIO section 1332 website once the Departments have completed a preliminary review of the application in accordance with 45 CFR 155.1308(c) and 31 CFR 33.108(c). 45 CFR 155.1324(c)(2) also requires states to publish the final annual report on state's public web site within 30 days of submission to and approval by the Secretary, respectively.

17. Expiration Date

There are no instruments associated with this information collection.