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

I. Introduction

Why is CMS Requesting a Non-Substantive Change?

This non-substantive change request makes updates to the information collection burden associated with the Quality Improvement Strategy (QIS) for Plan Year 2021, approved under OMB Control Number 0938-1286 and is summarized herein. The changes described in this request do not introduce new policy or any fundamental program changes. This non-substantive change reduces burden for this year (2020) and is being submitted for approval by OMB as a result of the recent CMS decision to suspend data collection for the QIS for Plan Year 2021[1].

II. Description of Non-Substantive Changes

What is the current status of this ICR?

The QIS Implementation Plan and Progress Report (CMS 10540; **OMB Control No. 0938-1286**) is currently approved through November 30, 2020 and a routine three-year renewal is expected after completion of the PRA clearance process.[2] The total current annual burden approved for this ICR is 12,000 hours, with an estimated 250 responses per year. Based on the April announcement of the suspension of 2020 data collection for the QIS that would normally have been submitted for PY 2021 QHP certification, CMS estimates a nominal reduction in burden this year. To note, the QIS form was not posted this year since CMS directed issuers to discontinue QIS data collection in calendar year 2020.

What are the changes that CMS is making?

CMS is making minor burden reduction non-substantive changes to the QIS ICR to reflect the discontinuation of data announced on April 18, 2020. For the QIS, there is burden reduction related to all PY 2021 QIS activities, since issuers were directed to discontinue activities and not submit data for the PY 2021 QHP Application Period.

III. Description of Burden Adjustments

We have revised the Supporting Statement Part A burden table accordingly based on the 2020 suspension of data collection described above. CMS estimates an annual burden hour reduction from 48 hours to **zero hours** for the QIS for Plan Year 2021.

QIS Annual (for 2020) Estimated Hour Burden and Cost Burden for One Issuer[3]

Step #	Step Name	Average Hourly Labor Costs (Hourly Rate + 100% Fringe Benefits)	Hour Burden	Total Cost Burden (Per Issuer)
1	Gather Information	$107.43	0	$0
2	Develop Response and Submit Form	$134.23	0	$0
	Total		0	**$0**

[1] COVID-19 Marketplace Quality Initiatives memo available at https://www.cms.gov/files/document/covid-qrs-and-marketplace-quality-initiatives-memo-final.pdf

[2] ICR renewal is in process; the 60 day FRN published on May 4, 2020: https://www.federalregister.gov/documents/2020/05/04/2020-09452/agency-information-collection-activities-proposed-collection-comment-request

[3] Updated to reflect that an issuer is expected to spend 0 hours gathering information, developing response and submitting a form for this year because the form has not been released and because the actual quality improvement activities are not included in the burden estimate.