

Emergency Clearance Request

CMS-P-0015A; OMB Control Number 0938-NEW

“Medicare Current Beneficiary Survey COVID-19 Rapid Response Supplement”

The United States is responding to an outbreak of respiratory disease caused by a novel (new) coronavirus that was first detected in China and which has now been detected in more than 190 countries internationally, and all 50 States and the District of Columbia. The virus has been named “severe acute respiratory syndrome coronavirus 2” (SARS-CoV-2”) and the disease it causes has been named “coronavirus disease 2019” (“COVID-19”).

On January 31, 2020, Health and Human Services Secretary, Alex M. Azar II, determined that a Public Health Emergency (PHE) exists for the United States to aid the nation’s healthcare community in responding to COVID-19 (hereafter referred to as the PHE for the COVID-19 pandemic); on April 21, 2020, Secretary Azar renewed, effective April 26, 2020, the determination that a PHE exists.

Older people and people of all ages with severe chronic medical conditions — like heart disease, lung disease and diabetes, for example — seem to be at higher risk of developing serious COVID-19 illness¹. According to the Centers for Disease Control and Prevention (CDC), as of July 9, 2020, the pandemic has resulted in more than 3,047,671 confirmed human infections and more than 132,056 deaths in the United States². With the emergence of the COVID-19 pandemic in the U.S., CMS is uniquely positioned to collect timely and vital information on how the pandemic is impacting the Medicare population by utilizing the MCBS.

CMS has determined that asking a short series of COVID-19 related questions as a supplement to the Medicare Current Beneficiary Survey is essential to CMS’ emergency response to the outbreak of the COVID-19 pandemic. Specifically, self-reported data from beneficiaries who participate on the MCBS will provide unique and critical COVID-19 measures that are not available in CMS administrative data. For example, CMS has provided valuable aggregate data from Medicare Fee-for-Service claims data, Medicare Advantage encounter data, and Medicare enrollment information³. Self-reported data obtained through the MCBS COVID-19 Supplement will provide additional measures that can be provided only by interviewing Medicare beneficiaries.

MCBS respondents, by definition, are most at risk for underlying conditions that may lead to more severe COVID-19 complications. Since the MCBS is a nationally representative sample of all Medicare beneficiaries, CMS has determined that a MCBS Fall COVID-19 Supplement is a unique vehicle to further assess and understand the COVID-19 pandemic. Implementing the MCBS Fall COVID-19 Supplement no later than October 2020 will allow for data to begin to be released to the public by December 2020. Because the survey must remain in the field for multiple weeks to complete data collection, launching the survey later than the beginning of October is not feasible to provide data by the end of the year.

¹ <https://www.cdc.gov/mmwr/volumes/69/wr/mm6915e3.htm>

² <https://www.cdc.gov/coronavirus/2019-ncov/cases-updates/cases-in-us.html>

³ <https://www.cms.gov/files/document/medicare-covid-19-data-snapshot-fact-sheet.pdf>

Data from the Supplement will focus on preventive measures being taken by Medicare beneficiaries, availability to utilize telehealth, deferred medical care and for what kinds of services, likelihood of taking a COVID-19 vaccine, and social/emotional items that provide measures of the impact of the pandemic on the well-being of the Medicare population.

The MCBS is conducted under 0938-0568, expiration 08/31/2022. However, complying with the Paperwork Reduction Act requirements to revise the MCBS in order to add the COVID-19 questions requires a 60-day public notice followed by a 30-day public notice. This does not provide sufficient time to subsequently program, test, and train survey interviewers to conduct the MCBS COVID-19 Supplement by October 2020. Therefore, if the emergency request is not approved, the questions cannot be asked in 2020 which will result in a loss of timely data to understand the pandemic's impact on Medicare beneficiaries. .

CMS requests that OMB consider approving the emergency clearance request by August 7, 2020. This date is based on approximately an 8 week accelerated schedule to prepare for data collection (2 weeks to finalize case management and questionnaire programming specifications, 4 weeks for programming and user acceptance testing, and 2 weeks for final systems integration testing, during which remote training of interviewers will also be conducted). These steps must be done concurrently and 8 weeks is the shortest period of time that will result in a fully developed and tested instrument.

Data collection for the Fall COVID-19 Supplement to be administered by phone of all MCBS survey respondents will begin October 5, 2020 for a 5 week period. Once data collection is completed, approximately 5 weeks is needed for data processing, data review, quality control, weighting and development of preliminary estimates which will be released to the public by mid-December. This will be followed by data releases in 2021 as part of the MCBS 2019 Survey File Limited Data Set. Access to disclosure protected data is also planned through a special stand-alone 2019 MCBS COVID Public Use File in order to provide the data in the most expeditious manner to data users both internal to and external to CMS.

Once the emergency information collection request is approved, CMS will seek public comments during the required 60-day and 30-day notice and comment periods associated with obtaining a standard (non-emergency) OMB approval for extending the information collection request into 2021.

Background

With the emergence of the COVID-19 pandemic in the U.S., CMS is uniquely positioned to collect timely and vital information on how the pandemic is impacting the Medicare population by utilizing the MCBS.

The MCBS is a continuous, multi-purpose survey of a representative national sample of the Medicare population, including the population of beneficiaries aged 65 and over and beneficiaries aged 64 and below with eligible disabilities, residing in the United States (it is collected under 0938-0568, expiration 08/31/2022). MCBS beneficiaries, by definition, are most at risk for underlying conditions that may lead to more severe COVID-19 complications. This request for emergency clearance approval proposes to add the Fall COVID-19

Supplement to the MCBS Fall 2020 Round 88 data collection. By selecting MCBS respondents to participate in the Fall COVID-19 Supplement, CMS can reduce the burden of the questionnaire by only needing to ask questions directly related to the impact of the pandemic.

A test of the methods and questions proposed was approved by OMB on May 7, 2020 under CMS-10549 GenIC#7 MCBS COVID-19 Rapid Response Supplement Testing under the MCBS Generic Clearance (0938-1275). The test was launched on June 10 and preliminary results have been obtained in order to inform this emergency clearance request.

CMS cannot reasonably comply with the normal clearance time periods given the urgent necessity to collect and disseminate data on the impact of the pandemic in a timely manner. Without approval of this request, CMS will not be able to conduct the Fall COVID -19 Supplement.

CMS has published a 10-day Federal Register Notice on **July XX, 2020 (XX FR XXXX)**. No comments were received. Within 30 days of approval of this emergency clearance, CMS intends to publish a 60 day notice providing further opportunity for public comment, followed by a 30 day notice, as required by Part 1320 and submission to OMB for approval. Our intention is to continue collecting these questions into 2021, pending OMB approval, in order to continue to measure the impact of the pandemic on the lives of Medicare beneficiaries.

Therefore, CMS requests a 180-day emergency clearance to launch the Fall COVID-19 Supplement to obtain these data. Please provide an approval/disapproval determination of this request to collect information under an emergency clearance by close of business on August 7, 2020. Specifically, we request approval based on the schedule that follows:

Requested and Proposed Timeline

July 17, 2020

- Target display date for the Emergency FR notice
- Start of 10-day public comment period for emergency clearance (under 0938-NEW)
- PRA package submitted to OMB
- Start of informal OMB review period

July 27, 2020

- End of 10-day public comment period.
- OMB begins review.

August 7, 2020

- **Requested OMB approval date for emergency clearance**

September 1, 2020

- Start of 60-day public comment period to add Fall COVID-19 Supplement questions to 2021 MCBS (under 0938-0568)

November 2, 2020

- Review of public comments and finalize submission to OMB

November 12, 2020

- Start of 30-day public comment period

- PRA package submitted to OMB

December 15, 2020

- Target date for OMB approval for 2021 MCBS