Supporting Statement Part A
Medicare Advantage Chronic Care Improvement Program (CCIP) Attestations
CMS-10209, OMB 0938-1023

Background

Section 1852(e) of the Social Security Act (the Act) requires that Medicare Advantage (MA) organizations (MAOs) have an ongoing Quality Improvement (QI) Program. CMS regulations at 42 CFR 422.152(a) outline the QI Program requirements for MAOs, which include the development and implementation of a Chronic Care Improvement Program (CCIP) that meets the requirements of 422.152(c) for each contract.

The statutory and regulatory intent of the CCIPs includes the promotion of effective chronic disease management and the improvement of care and health outcomes for enrollees with chronic conditions. Effective management of chronic disease can achieve positive outcomes, including: slowing disease progression, preventing complications and development of comorbidities, reducing preventable emergency room (ER) encounters and inpatient stays, improving quality of life, and cost savings for the MAO and the enrollee. CMS recommends MAOs conduct CCIPs over a three-year period.

The CCIP should cover all non-special needs coordinated care plans, including medical savings account (MSA) and private-fee-for-service (PFFS) plans with contracted networks. MAOs should also conduct a separate CCIP for each type/sub-type of special needs plan (SNP) offered under each contract.

MAOs must use the Health Plan Management System (HPMS) to report the status of their CCIP to CMS by December 31 annually. Submissions include an attestation by the MAO regarding its compliance with the ongoing CCIP requirement (42 CFR 422.152(c)(2)).

The final rule (CMS-4182-F; RIN 0938-AT08) effective January 1, 2019, removed the previous Quality Improvement Project (QIP) requirement entirely and allowed MAOs to focus on a single quality project, the CCIP. This rule-related change was highlighted and approved by OMB in the previous iteration of our CCIP PRA package. Moving forward, the requirement for CCIP attestations still stands.

Justification

1. Need and Legal Basis

MAOs are required by section 1852(e) of the Act and CMS regulations at 42 CFR 422.152(a) to have an ongoing QI Program that meets CMS requirements and includes a CCIP that meets the requirements of 422.152(c). MAOs must make information on the status and results of ongoing projects available to CMS upon request (422.152(c)(2)).

2. Information Users

The collected attestation information will be used by CMS to ensure that MAOs are conducting required CCIP activities.

3. Use of Information Technology

Technology is used in the collection, processing, and storage of the data. Specifically, MAOs must attest that they have an ongoing CCIP and identify the conditions on which these projects focus via HPMS annually. The submission is 100 percent electronic.

4. Duplication of Efforts

This collection does not contain duplication of similar information.

5. Small Business

This collection does not impose a significant impact on small businesses and other entities.

6. Less Frequent Collection

MAOs are only required to attest electronically that they are complying with the ongoing CCIP requirement. In addition, MAOs should assess and internally document activities related to the CCIP on an ongoing basis, as well as modify interventions and/or processes as necessary. A less frequent collection would not allow CMS to ensure that annual requirements are being met. This collection allows CMS to ensure that annual requirements are still being met, while also reducing plan burden.

7. Special Circumstances

There are no special circumstances that would require an information collection to be conducted in a manner that requires respondents to:

- Report information to the agency more often than quarterly;
- Prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- Submit more than an original and two copies of any document;
- Retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;
- Collect data in connection with a statistical survey that is not designed to produce valid and reliable results that can be generalized to the universe of study,
- Use a statistical data classification that has not been reviewed and approved by OMB;

- Include a pledge of confidentiality that is not supported by authority established in statute or regulation that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
- Submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

8. Federal Register/Outside Consultation

The 60-day Federal Register notice published in the Federal Register on April 9, 2021 (86 FR 18534). No comments were received.

The 30-day Federal Register notice published in the Federal Register on June 17, 2021 (86 FR 32268).

9. Payments/Gifts to Respondents

There are no payments/gifts to respondents associated with this information collection request.

10. Confidentiality

Consistent with federal government and CMS policies, CMS will protect the confidentiality of the requested proprietary information. Specifically, only information within this collection (or attachments thereto) that constitutes a trade secret, privileged or confidential information, (as such terms are interpreted under the Freedom of Information Act (FOIA) and applicable case law), and is clearly labeled as such by the respondent, and which includes an explanation of how it meets one of the expectations specified n 45 CFR Part 5, will be protected from release by CMS under 5 U.S.C. 552(b)(4). Information not labeled as trades secret, privileged, or confidential or not including an explanation of why it meets one or more of the FOIA exceptions in 45 CFR Part 5 will not be withheld from release under section 552(b)(4).

11. Sensitive Questions

There are no sensitive questions associated with this collection. Specifically, the collection does not solicit questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

12. Burden Estimates (Hours and Wages)

Wages

To derive average costs, we used data from the U.S. Bureau of Labor Statistics' May 2020 National Occupational Employment and Wage Estimates for all salary estimates (http://www.bls.gov/oes/current/oes_nat.htm). In this regard, the following table presents the mean hourly wage, the cost of fringe benefits and overhead (calculated at 100 percent of salary), and the adjusted hourly wage.

Occupation Title	Occupation Code	Mean Hourly Wage ($/hr)	Fringe Benefits and Overhead ($/hr)	Adjusted Hourly Wage ($/hr)
Compliance Officer	13-1041	36.35	36.35	72.70

As indicated, we are adjusting our employee hourly wage estimates by a factor of 100 percent. This is necessarily a rough adjustment, both because fringe benefits and overhead costs vary significantly from employer to employer, and because methods of estimating these costs vary widely from study to study. Nonetheless, there is no practical alternative, and we believe that doubling the hourly wage to estimate total cost is a reasonably accurate estimation method.

Burden Estimates

As explained below, the currently approved information collection request sets out burden for CCIP reports. This 2021 package iteration removes the QIP attestation requirement and focuses on the single CCIP attestation requirement.

We estimate that it would take no more than 15 minutes (0.25 hours) at $72.70/hr for a compliance officer to complete their single CCIP attestation electronically. In aggregate, we estimate an annual burden of 161.25 hours (645 MA contracts x 0.25 hr) at a cost of $11,722.88 (161.25 hr x $72.70/hr) or $18.18 per MA contract ($11,722.88 / 645 MA contracts).

Additionally, 42 CFR 422.152(c)(2) states that MAOs must report the status and results of each CCIP to CMS as requested. CMS may require a few MAOs (no more than 5 annually) to electronically upload information about the status and results of each CCIP. CMS provides model templates for the CCIP components, available for MAOs' reference in Appendices A and B of the MA CCIP Resource Document.[1] MAOs may use these as a reference for their electronic uploads, however, strict adherence to these templates is not required. Since we estimate fewer than ten respondents, the information collection requirements are exempt from the requirements of the PRA (5 CFR 1320.3(c)).

1 https://www.cms.gov/files/document/cms-ma-ccip-resource-document-updated-2020.pdf-0

Likewise, any follow-up questions would be subject to the same number of respondents such that they would also be exempt under the same provision of the PRA's implementing regulations.

Information Collection/Reporting Instruments and Instruction/Guidance Documents

- CCIP Screen Shot – Attestation Form

MAOs are currently required to submit one electronic attestation form annually for the CCIP. The current CCIP attestation form requires MAOs to check a box certifying that they have an ongoing CCIP that meets the requirements laid out in regulation and sub-regulatory guidance.

13. Capital Costs

We do not anticipate additional capital costs. CMS requirements do not require the acquisition of new systems or the development of new technology to complete these attestations.

14. Cost to Federal Government

MAOs are currently required to annually attest that they have ongoing CCIPs electronically via HPMS. Based on the budgeted amount per review and estimated wages of reviewers and support staff, we estimate it will take a single CMS reviewer no more than 15 minutes (0.25 hours) to review the CCIP submissions from a single MAO. We assume a GS-13, step 5, with a mean wage of $56.31/hr, which with an allowance of 100 percent for overhead and fringe benefits becomes $112.62/hr. These estimates are based on the salary of a single CMS reviewer at a GS13-5 salary level in the Washington, Baltimore, Arlington locality.[2]

In aggregate, we estimate it would take 161.25 hours (645 MA contracts x 0.25 hr) at a cost of $18,160 (161.25 hrs x $112.62/hr).

15. Changes to Burden

CCIP and QIP Reporting Tools (Removed Requirements/Burden)

As of January 1, 2019, the QIP attestation is not required. Therefore, we are removing the following forms that were associated with the 2017 package:

- QIP Screen Shot – Electronic Attestation Form

Burden has decreased due to the removal of the QIP attestation requirement and the collection now focusing on the single CCIP attestation requirement. Burden has also decreased due to a decrease in MA contracts participating from 750 to 645.

2 https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2021/DCB_h.pdf

Cost

	CY 2017 (Attestation)				CY 2021 (Attestation)		
	Annual Burden Hours	**Wage ($/hr)**	**Cost ($)**		**Annual Burden Hours**	**Wage ($/hr)**	**Cost ($)**
CCIP	187.5	67.54	12,663.75		161.25	72.70	11,722.88
Total	**187.5**		**12,663.75**		**161.25**		**11,722.88**

Our wage estimate is now based on 2020 BLS data which has been adjusted to account for fringe benefits and overhead. In this regard, our wage figure has increased by $5.16/hr (from $67.54/hr to $72.70/hr). Overall, our cost estimate has decreased by $940.87 ($12,663.75 - $11,722.88).

16. Publication/Tabulation Dates

CMS anticipates that there will be no public reports on CCIP findings.

17. Expiration Date

CMS is not requesting an exemption from displaying the expiration date. The expiration date will be added to the attestation screens in HPMS.

18. Certification Statement

There are no exceptions to the certification statement.

B. Collections of Information Employing Statistical Methods

This information collection does not employ any statistical analyses.