

**Justification for a Non-substantive Change  
Quarterly Medicaid and CHIP Budget and Expenditure Reporting for the  
Medical Assistance Program, Administration and CHIP  
CMS-10529 (OMB 0938-1265)**

CMS proposes to reformat the reporting of state budget estimates by adding a non-substantive form, Form CMS-37.3 Summary, to the CMS-37. The added form will require minimal action from states. Consequently, we are not revising any of our burden estimates.

The added form is necessary for the accurate reporting, transparency, and oversight of states' budget estimates for the various provisions of ARP (H.R. 1319 the American Rescue Plan Act of 2021) and FFCRA (the Families First Coronavirus Response Act). Currently the budget estimates for these provisions are provided on the Form CMS-37.12 Budget Narrative within the MBES (Medicaid Budget and Expenditure System). There are no revisions to the information collected.

Beginning on April 1, 2021, ARP requires that states report their budget estimates for sections 9811, 9813, 9814, 9815, and 9817 that are included in their request for Medicaid funding. The break-out of the estimates by section is necessary to comply with Action Transmittal OG AT 2021-05 effective March 11, 2021, which requires that all HHS awarding agencies provide transparency in the tracking of funding related to, the response to and recovery from, the COVID-19 pandemic.

States are already knowledgeable and experienced with providing this information on the Form CMS-37.12 Budget Narrative; however, the CMS-37.3 Summary form will facilitate a more accurate reporting, transparency, and oversight of the funding.