# **Supporting Statement – Part A**

Generic Clearance for CMS and Medicare Administrative Contractor (MAC) Generic
Customer Experience
(OMB control number: 0938-New; CMS-10731)

### **Background**

The Centers for Medicare & Medicaid Services (CMS) requests OMB approval to collect generic feedback from respondents including, but not limited to Medicare providers, Medicare suppliers, provider or supplier staff, billers, credentialing agencies, researchers, clearinghouses, consultants, and attorneys. These surveys will give us insights into customers' perceptions and opinions and will be used to improve customer experiences and communications materials. They won't be generalized to the population of study.

We, and our Medicare Administrative Contractors (MACs), will manage and administer multiple online surveys, use online collaboration tools, and face-to-face interviews to get customer and stakeholder feedback in an easy, efficient, and timely way.

MACs are the primary operational contacts between the Medicare fee-for-service (FFS) program and Medicare-enrolled health care providers. They are private health insurance companies awarded geographic jurisdictional contracts by CMS to manage Medicare FFS functions for Original Medicare. Examples of these functions include:

- Processing claims
- Conducting provider education
- Answering telephone and written inquiries
- Handling appeals

We'll only submit a request for approval under this generic clearance if the:

- Information gathered will only be used internally for general service improvement and program management purposes and not for release outside the agency (if released, we'll follow the procedures outlined in Question 16)
- Information gathered won't be used to substantially inform influential policy decisions
- Collections won't be designed or expected to yield statistically reliable results or used as though the results are generalizable to the population of study

- Collections are voluntary
- Collections are low-burden for respondents (based on considerations of total burden hours, total number of respondents, or burden-hours per respondent) and are low-cost for both the respondents and the federal government
- Collections are non-controversial and don't raise concerns for other federal agencies
- Collections solicit opinions from respondents who have or may soon have experience with the Medicare program administered by the MACs, including our educational product and content users; and visitors to our CMS.gov web pages and MACs' online portals and websites

Respondents include, but aren't limited to Medicare providers, Medicare suppliers, provider or supplier staff, billers, credentialing agencies, researchers, clearinghouses, consultants, and attorneys.

We won't collect personally identifiable information (PII) unless we need that information to follow up with respondents who've voluntarily provided it for that purpose.

The types of collections this generic clearance covers include, but aren't limited to:

- Customer satisfaction surveys (for example, post-transaction surveys)
- Customer comment cards or complaint forms
- Small discussion groups and listening sessions
- Focus groups of customers, potential customers, or other stakeholders
- Observation research (for example, website or usability tests)
- Individual interviews
- Card sorting

We've established a manager for this generic clearance and will conduct an independent review of each information collection to make sure we're complying with the terms of this clearance before we submit each collection to OMB.

We'll submit a standardized form to OMB along with supporting documentation (for example, a copy of the comment card) to obtain approval for a collection meeting the conditions of this generic clearance.

If we can't meet these conditions, we'll submit an information collection request to OMB for approval through the normal PRA process.

### A. Justification

1. Need and Legal Basis

We're mandated by the <u>Social Security Act</u>, <u>Section 1874(A)(b)(3)(B)</u> to measure provider satisfaction. The Act says in part, "The Secretary shall include, as one of the standards developed under subparagraph (A), provider and beneficiary satisfaction levels."

Also, Executive Order 12862 requires us to:

- Regularly review our operations to find ways to improve the customer experience
- Provide service to the public matching or exceeding the best service available in the private sector
- Work continuously to make sure our programs are effective and meet our customers' needs

Under this collection authority, we can comply with the regulation and executive order and get information to improve the customer experience and reduce provider burden. We need to collect this information so we and the MACs can:

- Honor our commitment to improve service delivery
- Help customers have effective, efficient, and satisfying interactions with MACs
- Get feedback and early warnings about service issues
- Know where to focus to make communication, training, or operational changes to improve service and product delivery
- Maintain ongoing, collaborative, and actionable communications with customers and stakeholders
- Improve program management

In short, collecting this information will give us important insights about our customers and their satisfaction, allowing us and the MACs to improve the experience of Medicare providers.

#### 2. Information Users

Improving agency programs requires ongoing systemic review of service delivery and program operations compared to defined standards. We'll use multiple methods to collect, analyze, and interpret information from this generic clearance to find the strengths and weaknesses of our current services. We'll use this feedback to inform process improvements or maintain service quality offered to providers and stakeholders. We'll target areas like:

- Satisfaction
- Information accuracy
- Ease of use
- Issue resolution
- Courtesy
- Efficiency

If we don't collect this information, we won't have vital feedback from customers and stakeholders about our products, content, and services.

### 3. <u>Use of Information Technology</u>

- Is this collection currently available for completion electronically? Yes
- Does this collection require a signature from the respondent(s)? No
- If CMS had the capability of accepting electronic signature(s), could this collection be made available electronically? Not applicable
- If this collection isn't currently electronic but will be made electronic in the future, please give a date (month & year) as to when this will be available electronically and explain why it can't be done sooner. Not applicable
- If this collection cannot be made electronic or if it isn't cost beneficial to make it electronic, please explain. Not applicable

To reduce burden, we'll collect information electronically 85% of the time using online collaboration tools (for example, online computer, mobile, and social media surveys) and 15% of the time with limited interviews (for example, focus groups and usability testing).

### 4. <u>Duplication of Efforts</u>

We don't currently collect or keep similar data or know of any other sources in the Agency.

#### 5. Small Businesses

We'll minimize the burden on any small businesses or other small entities involved in the collections approved under this clearance by sampling, asking for readily available information, and using short, voluntary, and easy-to-complete information collection instruments.

#### 6. Less Frequent Collection

If we can't use the proposed surveys and other methods to get feedback, we and the MACs won't meet requirements outlined in statute and multiple Executive Orders. Additionally, we won't have timely information to adjust our services to meet customer needs and continue to improve satisfaction.

### 7. Special Circumstances

There are no special circumstances. The information collected will be voluntary and won't be used for statistical purposes.

### 8. <u>Federal Register/Outside Consultation</u>

The 60-day notice published in the *Federal Register* on October 28, 2022 (87 FR 65207). No comments were received. The 30-day notice published in the *Federal Register* on February 7, 2023 (88 FR 7974). No comments were received.

# 9. Payments/Gifts to Respondents

Respondents won't receive payment or other forms of remuneration.

# 10. Confidentiality

We don't pledge confidentiality.

### 11. Sensitive Questions

We won't ask personal or sensitive questions.

# 12. Burden Estimates (Hours & Wages)

We'll use a variety of instruments and platforms to collect information from respondents. The 50,000 annual burden hours requested are based on the number of collections we expect to conduct over the requested period for this clearance. The costs will be discussed as part of each individual generic information collection (GenIC) upon submission to OMB.

Estimated Annual Reporting Burden				
Type of Collection	No. of Respondents	Annual Frequency per Response	Hours per Response	Total Hours
Electronic	005 000	1	0.40	40.050
Internal or vs. 0. Forms Crowns	995,000	1	.049	48,950
Interviews & Focus Groups	2,100	<u>l</u>	.5	1,050

### 13. Capital Costs

There are no capital costs associated with the collections under this generic clearance.

#### 14. Cost to Federal Government

We expect the yearly cost to the Federal Government to be approximately \$1,545,000 to prepare, conduct, and analyze and review the surveys.

## 15. Changes to Burden

This is a new information collection request.

### 16. Publication/Tabulation Dates

The feedback we collect under this generic clearance will give us useful information, but won't yield data that can be generalized to the overall population. We intend to use the findings for general service improvement, and while we don't intend to publish our findings, we might receive requests to release them (for example, congressional inquiry, Freedom of Information Act requests). We'll distribute findings when appropriate, strictly following the Agency's "Guidelines for Ensuring the Quality of Information Disseminated to the Public," and will include the result limitations discussed above.

#### 17. Expiration Date

The expiration date will be on each instrument as part of the PRA Disclosure Statement.

### 18. Certification Statement

There are no exceptions.