

To: AnhViet Nguyen, Jess Maksut and Nancy Chiles Shaffer

From: Susan Cahn, Phoebe Lamuda, Laurie Imhof and Alva Chavez

Subject: Medicare Part C and Medicare Part D Enrollment Form Interviews: Responses to OMB Comments on Clearance Package, Supporting Statement A

Date: March 3, 2023

The purpose of this memo is to document CMS/NORC's responses to OMB's comments on Supporting Statement A of the Medicare Part C and Medicare Part D Enrollment Form Interviews clearance request for new information collection request, received on March 1, 2023. The memo also summarizes corresponding edits made to Supporting Statement B.

Responses to OMB comments

1. **Racial Question:** Alphabetical for race is ok only if they are nesting the Asian subcategories under Asian – e.g., indenting them. The goal is to have the “other Asian” is at the end of the Asian choices; same for Native Hawaiian and Pacific Islander. There isn't much point is adding the sub-categories under Asian if do it in a way that has not been tested. OMB is requesting that the racial question in this package be revised throughout CMS ICRs for those currently being reviewed or via a change request.

Response: In the attached Word version of the cognitive interview script, we have reformatted the response options so that Asian subcategories are under an Asian category with “other Asian” at the end, and similarly for Native Hawaiian and Pacific Islander response options. These response options came from the generic Part C/D enrollment form (OMB 0938-1378). Please note that the interviews will only take place by phone so the respondents will not see the Asian subcategories when completing the cognitive interview

1. **OMB comment:** Cog Interview Script: It is too verbose and doesn't organize the questions in a way that is likely to help us get answers. We request a WORD version and we can edit and if possible or CMS can provide a revised draft.

CMS/NORC Response: Given the request to revise the cognitive interview script, we are providing an annotated version of proposed edits as well as a new draft of the cognitive interview script, CMS/NORC has added proposed a new script to help organize and streamline the questions. We look forward to receiving OMB's feedback on the edits, as well as any additional proposed edits.

In addition, per OMB's recommended edits to the cognitive interviewing script, we have reduced the estimated burden time from 45 minutes to 30 minutes. The respondent burden hours and costs in section A.12 have been updated accordingly.

2. **OMB comment:** Incentives: We cannot approve a \$75 incentive. \$50 is our new standard for an in person cognitive interview and \$40 for video/phone cog interviews. The population here is folks who are not likely working, and this is not designed to be representative sample, only a varied sample. Therefore, we are recommending the \$40 level.

CMS/NORC Response: CMS appreciates OMB's guidance on the participant incentive amount. The incentive amount has been revised accordingly, from \$75 to \$40, in section A.9.

3. **OMB comment:** Gender Screener: For gender, if they are going to use the single question, they should consider the latest test results (by NCHS) that suggest saying:

You may select more than one answer.

Are you:

1. Female
2. Male

CMS/NORC Response: In the attached Word version of the cognitive interview script, we have revised the question to the one recommended by OMB.

4. **OMB comment:** Supporting Statement B: It seems that there is some older language. Can the program language take a look at supporting statement B and make sure it is still relevant? For example "CMS has a long-term goal of collecting race and ethnicity data from all Medicare enrollees. CMS is currently requesting OMB approval of the revised collection of information based on the inclusion of race and ethnicity data on the Medicare Advantage (Part C) and/or Prescription Drug Plans (Part D) enrollment form. CMS will initially focus efforts on enrollees who newly elect or change coverage in the Medicare Part C and D programs."

CMS/NORC Response: CMS has updated the language in SSB accordingly in the Introduction.

Corresponding Edits Made to Supporting Statements A & B

CMS/NORC has made the following edits to SSB to correspond with OMB's comments and edits to SSA. NORC also responded to the comments in SSA and made edits that corresponded with OMB's comments.

1. **Section B.1 Respondent Universe and Sampling Methods:** CMS has revised this section to address OMB's comments in section A.2 regarding the goal of conducting cognitive interviews on a "varied convenience sample of people who did not provide information on their race and ethnicity in completing their enrollment for Medicare Advantage or Prescription Drug plan...".
2. **Section B.2 Procedures for Collection of Information:** CMS has revised this section to reflect NORC's updated plan to contact participants and conduct the cognitive interviews by telephone instead of via Zoom or another video conference system. This change is recommended to facilitate the ability of the NORC interviewing staff to administer the screener and conduct the interview as part of the initial contact call, if the participant is willing to complete the interview

at that time. This will eliminate the additional step of sending the participant an email with an Outlook invitation with the link to the Zoom meeting. This method may also be more effective with participants who are of Medicare eligible age. The telephone contact method will still allow the interviews to be audio recorded, with the respondents' consent.

3. **Section B.3 Methods to Maximize Response Rates and Deal with Nonresponse:** CMS has edited this section to clarify the starting sample numbers to achieve a “varied convenience sample”; add the maximum number of telephone attempts that will be made for each sampled enrollee; and update the interview length and approved incentive amount.