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Office of Management and Budget (OMB)

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Date:

Subject: Non-Substantive Change Request – Cooperative Agreements to Support
Establishment of State-Operated Health Insurance Exchanges (OMB #0938-1119)

This memo requests approval of non-substantive changes to the approved information collection, Cooperative Agreements to Support Establishment of State-Operated Health Insurance Exchanges (OMB #0938-1119).

Background

Under 42 CFR §155.1200(b), State Based Marketplaces (SBMs) are required to provide performance monitoring data to CMS. SBMs must provide this data at least annually and in the manner, format, and timeline specified by CMS. OMB originally approved the SBM Budget Template to clarify reporting definitions and refine the periodic requirement resulting in a net decrease of reporting metrics and burden on September 29, 2011. Further revisions were also approved, with the latest version approved on May 16, 2022 with an expiration of May 31, 2025.

SBMs utilize this Template to report Exchange expenditures and revenue annually. The template includes information such as the effectuated enrollment per plan for the Exchanges; type of revenue; and general, marketing and outreach, call center, information technology platform expenditures. These requirements apply to the anticipated 20 states that will be operating a SBM and 3 SBM-FPs anticipated to be operating between PY 2023 and PY 2025, for a total of 21 - 23 respondents.

Overview of Requested Changes

Since approval of the SBM Budget Template, the template has been updated to remove references to SHOP and provide SBMs and SBM-FPs with a more streamlined and less burdensome template.

The changes are:

- All line and column breakouts for Individual and SHOP Marketplaces have been removed from all sections.
- The Carrier Assessment has been relocated to Section A. General.
- Section C. Revenue has been redesigned to provide more flexibility in revenue reporting.
- A new field for total allowable reserve has been added to Section E.
- Various notes, field names, and tool tips have been updated throughout the template to improve clarity and guidance.

Burden Estimates

The approved annualized burden estimated that 18 SBMs and 3 SBM-FPs would submit annual budget reports detailing Exchange expenditures and revenue. Although additional states are projected through 2025, we do not anticipate additional burden based on these non-substantive changes, since the updates are removing information and providing a more streamlined template. It is anticipated that the annualized burden estimate in the current cooperative PRA would be less.

Time Sensitivities

Being able to make changes requested to the approved Template will ensure that SBMs and SBM-FPs are prepared to report on June 1, 2024.