

Supporting Statement – Part A
Medicaid Eligibility and Enrollment (EE)
Implementation Advanced Planning Document (IAPD) Template
CMS-10536, OMB 0938-1268

Background

Title XIX of the Social Security Act and regulations at 42 CFR part 433, subpart C, make available enhanced Federal financial participation (FFP) to states for the design, development, and implementation of mechanized claims processing and information retrieval systems used in State Medicaid Programs as well as for the ongoing operation of those systems. April 19, 2011 (76 FR 21950) final rule (CMS-2346-F, RIN 0938-AQ53) clarifies that Medicaid eligibility and enrollment determination systems are included in the definition of mechanized claims processing and information retrieval systems and are therefore eligible for enhanced FFP. This enhanced FFP will allow states to build and maintain Medicaid eligibility and enrollment determination systems that will provide more efficient, economical, and effective administration of the Medicaid program and address the changes to the Medicaid program under the Affordable Care Act.

Title XIX and CMS-2346-F also provide 90 percent FFP to states for the design, development and implementation of Medicaid eligibility and enrollment determination systems, and 75 percent FFP for operating and maintaining those systems. To receive enhanced FFP for these systems, states must provide further detail on how the proposed system will address the standards and conditions identified in § 433.112(b). States must also obtain prior approval from the Centers for Medicare & Medicaid Services (CMS) by submitting an Advanced Planning Document (APD). In this case, our Medicaid Eligibility and Enrollment (EE) Implementation Advanced Planning Document (IAPD) Template or "IAPD Template."

To justify a request for enhanced FFP to support Medicaid eligibility determination system costs, states must provide sufficient information and documentation in an APD to CMS for review.

This 2024 iteration requests OMB approval to reinstate this collection of information without change. It expired inadvertently on June 30, 2024. While there are no program changes, we have adjusted our cost estimate by \$41,879 due to updated BLS wage data. Additionally, we are not proposing any changes to the most recently active IAPD Template.

A. Justification

1. Need and Legal Basis

To assess the appropriateness of 'states' requests for FFP for expenditures under Title XIX of the Social Security Act related to Medicaid eligibility and enrollment determination systems, CMS must have sufficient information and documentation. CMS authorized funding for state requests for enhanced FFP for expenditures related to Medicaid eligibility and enrollment determination systems in our April 19, 2011, final rule.

A state that chooses to develop, enhance, or replace its required system or subsystems must first submit for approval an APD. CMS regulations concerning mechanized claims processing and information retrieval systems, including Medicaid eligibility and enrollment determination systems, are at 42 CFR part 433, subpart C. The general Health and Human Services (HHS) requirements for approval of APDs are at 45 CFR part 95, subpart F, and 42 CFR 457.230.

The IAPD Template is mandatory and is intended to reduce the burden on states by clearly indicating the information required for a successful submission.

2. Information Users

To justify a request for enhanced FFP to support Medicaid eligibility determination system costs, states must provide CMS with sufficient information and documentation in an APD. To assess the appropriateness of 'states' requests for enhanced FFP for expenditures under the Social Security Act related to Medicaid eligibility and enrollment determination systems, CMS staff will review the submitted information and documentation to make an approval determination for the APD.

3. Use of Information Technology

The IAPD Template is available in electronic format. We expect every submission to be forwarded to our agency electronically. The document is completed in a user friendly format.

4. Duplication of Efforts

There is no duplication of effort in the information associated with this collection.

5. Small Businesses

This collection does not impact small businesses.

6. Less Frequent Collection

States are only required to provide this information if they are specifically seeking FFP for mechanized claims processing and information retrieval systems, including Medicaid eligibility and enrollment determination systems. States that are not seeking FFP for this purpose do not need to submit this additional APD documentation. With the exception of the annual update, once any documents are approved, there is no need to resubmit additional documents, unless the state initiates a change.

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 notice published in the Federal Register on June 28, 2024 (89 FR 54002). While comments were due August 27, 2024, none were received.

The 30-day notice published on September 3, 2024 (89 FR 71283). Comments must be received by October 3, 2024.

9. Payments/Gifts to Respondents

There are no payments of gifts associated with this collection.

10. Confidentiality

There is no personal identifying information collected in the documents. All the information is available to the public.

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. Collection of Information Requirements and Associated Burden Estimates

Wage Estimates

To derive average costs, we used data from the U.S. Bureau of Labor 'Statistics' ('BLS') May 2023 National Occupational Employment and Wage Estimates for all salary estimates (www.bls.gov/oes/2023/may/oes_nat.htm). The following table presents 'BLS' mean hourly

wage, our estimated cost of fringe benefits and other indirect costs, and our adjusted hourly wage.

Estimated Hourly Wages

Occupation Title	Occupation Code	Mean Hourly Wage (\$/hr)	Fringe Benefits and Other Indirect Costs (\$/hr)	Adjusted Hourly Wage (\$/hr)
Business Operations Specialist	13-1000	42.33	42.33	84.66

We are adjusting our employee hourly wage estimates by a factor of 100 percent. This is necessarily a rough adjustment, because fringe benefits and other indirect costs vary significantly from employer to employer, and because methods of estimating these costs vary widely from study to study. Nonetheless, we believe that doubling the hourly wage to estimate total cost is a reasonably accurate estimation method.

Requirements and Burden Estimates

CMS estimates that it will take no more than 16 hours at \$84.66/hr for a business operations specialist to complete and submit the IAPD Template and supporting documentation to CMS, assuming the state chooses to submit all the documents and/or all the documents at one time. This estimate account for the initial APD, any APD updates, and the annual APD.

The potential number of respondents is 56 (50 States, D.C., and 5 territories); we estimate that most states, if not all, will submit at least annually.¹ Once approved, the state will not need to resubmit unless there is a need for revisions.

Suppose all states complete and submit the template once annually with two additional updates per year. In that case, CMS estimates the total annual burden of 2,688 hours (16 hr/submission x 3 submissions/yr x 56 respondents) at a cost of \$227,566 (2,688 hr x \$84.66/hr).

Burden Summary

Requirement	No. Respondents	Total Responses	Time per Response (hours)	Total Annual Time (hours)	Labor Cost (\$/hr)	Total Annual Cost (\$)
IAPD Template and Supporting Documentation	56	168	16	2,688	84.66	227,566

Information Collection Instruments and Instruction/Guidance Documents

Medicaid Eligibility and Enrollment (EE) Implementation Advanced Planning Document (IAPD) Template (No Changes)

¹ Puerto Rico, U.S. Virgin Islands, American Samoa, Northern Mariana Islands, and Guam.

13. Capital Costs

There are no capital costs.

14. Cost to Federal Government

CMS estimates that the review of the Implementation APD and supporting documentation will take approximately 6 hours assuming all of the documents are submitted simultaneously. CMS further estimates that one GS-13 Step 1 in the Baltimore area, where CMS Central Office is located, at an hourly rate of \$56.52/hr

(https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2024/DCB_h.pdf) will be responsible for the review and approval of these documents.

As such, the cost to the Federal Government is estimated at \$56,972 ($\$56.52/\text{hr} \times 6 \text{ hr} \times 168$ submissions per year).

15. Program or Burden Changes

This is an extension without change. While there are no program changes, we have adjusted our cost estimate by \$41,879 (from \$185,687 to \$227,566) due to updated BLS wage data (an increase of \$12.04/hr from \$72.62/hr to \$84.66/hr, adjusted).

16. Publication and Tabulation Dates

There are no plans to publish the information.

17. Expiration Date

The expiration date is displayed in the IAPD Template within the PRA Disclosure Statement.

18. Certification Statement

There are no exceptions to the certification statement.

B. Collection of Information Employing Statistical Methods

The use of statistical methods does not apply to this collection of information request.