

Appendix A: 60-day Notice Comment and Response Summary

Affordable Care Act Internal Claims and Appeals and External Review Procedures for Non-grandfathered and Grandfathered Group Health Plans and Issuers and Individual Market Issuers

(CMS-10338/OMB Control Number 0938-1099)

HHS received one comment from an anonymous commenter related to an information collection request (ICR) HHS released concerning CMS-10338, a Paperwork Reduction Act (PRA) document detailing requirements related to the internal claims and appeals and external review procedures for non-grandfathered and grandfathered group health plans and issuers and individual market issuers. This is the summary of and response to the comment.

Comment:

One commenter noted that the data collection might be useful but expressed their concern that the amount of manhours and costs associated with continuing the data set collection is onerous and burdensome to private entities, bureaucrats, and most importantly, taxpayers. The commenter suggested discontinuing further data set collections.

Response:

This information collection is associated with federal regulations promulgated pursuant to the Patient Protection and Affordable Care Act, and thus required by statute. HHS believes that the burden imposed on respondents is estimated accurately based on a rigorous examination of the data drawn from Bureau of Labor Statistics and other reliable sources to estimate number of respondents and labor costs. HHS continues to welcome additional feedback that specifically addresses the accuracy of the time and labor cost estimates.