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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 April 18, 2024 with an expiration of September 30, 2028.

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 21 states that will be operating a SBM and 3 SBM-FPs anticipated to be operating between PY 2026 and PY 2028, for a total of 22 - 24 respondents.

Overview of Requested Changes

Since approval of the SBM Budget Template, the template has been updated to include new tool tips to provide additional guidance for the Revenue and Net Gain/(Loss) sections. Related to that, guidance, notes fields in the same sections are now conditionally optional depending on how the exchange responds.

Burden Estimates

The approved annualized burden estimated that 21 SBMs and 3 SBM-FPs would submit annual budget reports detailing Exchange expenditures and revenue. Although additional states are projected through 2028, we do not anticipate additional burden based on these non-substantive changes, since the updates do not increase reporting requirements and provides respondents with clearer guidance. 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, 2026.