

Generic Supporting Statement
Eligibility Processing Data Report
CMS-10398 #66, OMB 0938-1148

This 2026 iteration revises our active collection of information request.

While active title of this collection is “Eligibility Processing Data Report and Renewal Compliance Template,” this iteration proposes to revise the title as indicated above.

A. Background

The Centers for Medicare & Medicaid Services (CMS) work in partnership with States to implement Medicaid and the Children’s Health Insurance Program (CHIP). Together these programs provide health coverage to millions of Americans. Medicaid and CHIP are based in Federal statute, associated regulations and policy guidance, and the approved State plan documents that serve as a contract between CMS and States about how Medicaid and CHIP will be operated in that State. CMS works collaboratively with States in the ongoing management of programs and policies.

In association with our June 3, 2026 (91 FR 33348) interim final rule with comment period (CMS-2454-IFC; RIN 0938-AV98) entitled, “Medicaid Program; Community Engagement Requirement for Certain Individuals” section 71119 of the Working Families Tax Cut (WFTC) legislation adds section 1902(xx) to the Social Security Act and requires States, as a condition of Medicaid eligibility for certain individuals, to establish and administer a community engagement requirement. CMS interprets the statutory requirements at sections 1902(a)(6) and 1902(a)(75) of the Act to provide authority to require States to submit data that allow for monitoring of their eligibility and enrollment processes. Under this authority, CMS anticipates requiring ongoing monthly State submissions of monitoring and program operations data related to community engagement implementation and outcomes, as included at 42 CFR § 435.562.

States currently submit monthly Medicaid and CHIP eligibility and enrollment information to CMS through the Medicaid and CHIP Eligibility Processing (EP) data reporting. The Eligibility Processing Data Report includes two monthly reports containing metrics on renewals initiated and the dispositions of those renewals and fair hearings that states submit using the safe web-based portal called the State Data Information System (SDIS). States submit a monthly report to reflect renewal and fair hearing outcomes from the previous month. States can correct their data as needed. Given that some renewals remain pending at the end of a reporting month, states also submit a one-time update to each monthly report to CMS in the fourth month after the report is first due to provide more complete renewal outcome data for the renewal cohort reflected in the initial report month. This results in states submitting two reports in a given month.

B. Description of Information Collection

Under § 435.562, States must submit eligibility and enrollment data elements for applicants and beneficiaries, including data specific to those who are applicants and beneficiaries who are eligible and enrolled in Medicaid on a basis subject to the community engagement under section

1902(xx) of the Act and §§435.550 through 435.563. For purposes of this revised information collection, CMS anticipates that States will report monitoring and program operations data specific to renewals of eligibility through the Medicaid and CHIP EP data set. While CMS will rely on the existing renewal and fair hearing information already collected in the EP data set to support monitoring of community engagement, this information collection request reflects the burden and costs associated with the five new renewal data metrics that will be added to the EP data monthly and, as needed, later modified in the updated monthly reports to support implementation of community engagement.

CMS currently collects 20 data metrics and submetrics in the EP data set, and we are adding five new data metrics to the EP data set to support implementation of community engagement as follows:

- Metric 9: Of the beneficiaries included in metric 5(a), the number renewed who are determined to be a specified excluded individual
- Metric 10: Of the beneficiaries included in metric 5(a), the number renewed who are applicable individuals and either demonstrated community engagement or were deemed to have demonstrated community engagement by meeting a mandatory exception.
- Metric 11: Of the beneficiaries included in metric 5(a), the number renewed who are applicable individuals and were deemed to have demonstrated community engagement by meeting a short-term hardship exception.
- Metric 12: Of the beneficiaries included in metric 5(b), the number determined ineligible due to not meeting the community engagement requirement after being provided a notice of noncompliance.
- Metric 13: Of the beneficiaries included in metric 5(c), the number disenrolled for procedural reasons after being provided a notice of noncompliance with community engagement.

CMS will update existing data collections reported outside the EP data set in other information collection requests for metrics in categories described in § 435.562.

For the data measures added to the EP data set to support the community engagement requirement, a “State” is defined (in the COI) as any of the 50 States and the District of Columbia that provides medical assistance on a basis subject to section 1902(xx); CMS estimates that currently 44 jurisdictions meet this definition (43 States and the District of Columbia). However, there are 56 jurisdictions who submit the Eligibility Processing Data Report.

Lastly, we are removing the burden from the Renewal Compliance Report from this collection, as it was a one-time requirement, and CMS is no longer collecting it from states.

C. Deviations from Generic Request

No deviations are requested.

D. Burden Hour Deduction

Wage Data

To derive average costs, we used data from the U.S. Bureau of Labor Statistics' May 2025 National Occupational Employment and Wage Estimates for all salary estimates (<https://www.bls.gov/oes/tables.html>). In this regard, the following table presents BLS' mean hourly wage, our estimated cost of fringe benefits and other indirect costs (calculated at 100 percent of salary), and our adjusted hourly wage.

BLS's wage estimates are updated annually. Current and historic wage figures can be found at the BLS address cited above. May 2025 is current as of the date of this collection of information request.

Occupation Title	Occupation Code	Mean Hourly Wage (\$/hr)	Fringe Benefits and Other Indirect Costs (\$/hr)	Adjusted Hourly Wage (\$/hr)
Business Operations Specialist, All Other	13-1199	45.18	45.18	90.36
Computer and Information Analyst	15-1210	57.41	57.41	114.82
Data Scientists (Public Sector)	15-2051	60.96	60.96	121.92
General and Operations Managers	11-1021	64.87	64.87	129.74

As indicated, we are adjusting our employee hourly wage estimates by a factor of 100 percent. This is necessarily a rough adjustment, both 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.

Collection of Information Requirements and Associated Burden Estimates

To estimate the financial burden on States, it was important to consider the Federal government's contribution to the cost of administering the Medicaid program. For Medicaid, all States receive a 50 percent Federal matching rate for most administration expenditures. States also receive higher Federal matching rates of 90 percent for design, development, and implementation and 75 percent for operations and maintenance of Medicaid IT systems. After taking into account the Federal contribution to the costs of administering the Medicaid programs for purposes of estimating State burden for collection of information we are estimating that States will contribute 25 percent of the costs.

The active burden associated with the Eligibility Processing Data Report consists of the time and effort for the state to pull and analyze data for accuracy and completeness and to submit the data through the designated reporting mechanism. There are a total of 56 jurisdictions who submit the Eligibility Processing Data Report.

States will submit a monthly Eligibility Processing Data Report and update the renewal outcome data of a previously submitted monthly Eligibility Processing Data Report on an ongoing

monthly basis. CMS expects that a Data Scientist would need 14 hours at \$121.92/hr to complete and submit the report and an additional 14 hours to update the previously submitted report.

CMS estimates an annual burden of 18,816 hours (14 hr/report x 24 submissions/year x 56 jurisdictions) at a cost of \$2,294,047 (18,816 hr x \$121.92/hr). Assuming a Federal administrative match of 75%, the estimated State share is \$573,512 ($\$2,294,047 \times 0.25$).

With regard to our June 3, 2026 interim final rule with comment period the burden associated with the EP data report consists of the initial, one-time system and process changes in a state to the EP data reporting to be able to pull the new data collection and report to CMS. The burden also consists of the time and effort for the state to pull and analyze data for accuracy and completeness and to submit the data through the designated reporting mechanism. CMS estimates that 44 jurisdictions will need to report the 5 new data metrics on an ongoing monthly basis and update the renewal outcome data of a previously submitted EP data report on an ongoing monthly basis.

For the one-time system and process updates, CMS estimates 44 jurisdictions will spend 162 hours to make changes. Of the 162 hours we estimate it will take a Computer and Information Analyst 160 hours at \$114.82/hr to review existing eligibility and enrollment data and organize these data appropriately to submit to CMS to meet the EP reporting requirements of § 435.562. We also estimate it will take a General and Operations Manager 2 hours at \$129.74 /hr to review the data and approve the submission of the data to CMS.

In aggregate we estimate a one-time burden of 7,128 hours (44 jurisdictions x 162 hr) at a cost of \$819,750 $[44 \times (160 \text{ hr} \times \$114.82/\text{hr}) + (2 \text{ hr} \times \$129.74/\text{hr})]$. Assuming a Federal administrative match of 75%, the estimated State share is \$204,938 ($\$819,750 \times 0.25$).

For the ongoing monthly reporting and updates of EP data, CMS estimates 44 jurisdictions will submit 2 reports each with existing metrics and new community engagement metrics on up to a monthly basis or, 1,056 responses on an annual basis (44 jurisdictions x 2 reports x 12 months). With 5 metrics, we estimate it will take a Computer and Information Analyst 3 hours (0.60 hr/response x 5 metrics) at \$114.82/hr to conduct the ongoing monthly reporting and updates for new community engagement measures. We also estimate it will take a General and Operations Manager 1 hour (0.20 hr/response x 5 metrics) at \$129.74/hr to review the data and approve the submission of the community engagement data to CMS.

In aggregate we estimate an annual burden of 4,224 hours (1,056 responses x 4 hr/response) at a cost of \$500,755 $(1,056 \times [(3 \text{ hr} \times \$114.82/\text{hr}) + (1 \text{ hr} \times \$129.74/\text{hr})])$. Assuming a Federal administrative match of 75%, the estimated State share is \$125,189 ($\$500,755 \times 0.25$).

Lastly, we are removing the estimated one-time burden of 2,240 hours (40 hr/report x 1 submission x 56 respondents) and \$202,406 (2,240 hr x \$90.36/hr for a Business Operations Specialist) from the one-time collection of the Renewal Compliance Report. Assuming a Federal administrative match of 75%, the estimated State share of savings is \$50,601 ($\$202,406 \times 0.25$).

In aggregate for this collection, including the burdens from states submitting the Eligibility Processing Data Report, system changes related to implementation of the community engagement requirement, Data monitoring for community engagement, and the removal of the Renewal Compliance Report, we estimate an annual/one-time burden of 27,928 hours at a cost of \$3,412,146. Assuming a Federal administrative match of 75%, the estimated State share is \$853,038 (\$3,412,146 x 0.25).

Annual Burden Summary

Requirements	Number of Respondents	Total Number of Responses	Time per Response (hours)	Total Time (hours)	Labor Rate (\$/hr)	Total Cost (\$)	Federal Match (\$)	State Share (\$)
Eligibility Processing Data Report (Active)	56 Jurisdictions	1,344 (56 x 12 months x 2 times per month)	14	18,816	121.92	2,294,047	1,720,535	573,512
System Changes for Community Engagement (CMS-2454-IFC)	44 Jurisdictions	44	162	7,128	varies	819,750	614,812	204,938
Data Monitoring for Community Engagement (CMS-2454-IFC)	44 Jurisdictions	1,056 (44 x 2 x 12 responses/year)	4	4,224	Varies	500,755	375,566	125,189
Renewal Compliance Report	56 Jurisdictions	(56)	(40)	(2,240)	90.36	(202,406)	(151,805)	(50,601)
TOTAL	56 Jurisdictions	2,388	varies	27,928	Varies	3,412,146	2,559,108	853,038

Although this collection of information request proposes 29,928 hours of burden, this iteration requests the addition of 8,872 hours (29,928 hr [revised] - 21,056 hr [active]) to avoid double counting or recounting our active estimate of 21,056 hours.

Information Collection Instruments and Instruction/Guidance Documents

This collection contains the following documents:

- Eligibility Processing Data Report portal screen shots
- Eligibility Processing Data Report specifications

The EP Data Report is accompanied by a:

- Technical specifications document which defines the specific data collected in the EP data report. The changes to the technical specifications document include instructions to states on how to report the new data measures in this collection.
- Screenshots of the information collection changes in the data collection instrument (SDIS portal). The screenshots reflect updates to the portal to account for the new data to be collected. The data collection instrument changes are expected to be complete in summer/early fall.

E. Timeline

The changes in this 2026 collection of information request are associated with our Interim Final Rule with Comment Period (CMS-2454-IFC; RIN 0938-AV98) entitled, “Medicaid Program; Community Engagement Requirement for Certain Individuals.” The rule filed for public inspection on June 1, 2026, and published on June 3, 2026 (91 FR 33348). Comments must be received by July 31, 2026.