

Supporting Statement Part A
Administrative Requirements for Section 6071 of the Deficit Reduction Act
CMS-10249, OMB 0938-1053

The contents of this Supporting Statement and the associated attachments have been reviewed to ensure that they are consistent with the Trump administration's policies, goals, and objectives.

This is a revised collection of information request that is being submitted to OMB for a three-year extension of the 0938-1053 control number.

Background

The Money Follows the Person (MFP) Demonstration, authorized under section 6071 of the Deficit Reduction Act of 2005 (DRA), supports state and territorial efforts to rebalance long-term services and supports (LTSS) systems by increasing the availability and utilization of home and community-based services (HCBS) and reducing reliance on institutional care. The demonstration provides flexible grant funding to assist states and territories in developing administrative infrastructure, strengthening transition processes, and building sustainable HCBS capacity within their Medicaid programs.

Section 5114 of the Consolidated Appropriations Act (CAA), 2023, extended the MFP Demonstration through Federal Fiscal Year (FY) 2027 at \$450 million annually. Currently, 41 recipients—36 grant recipients with active demonstrations and 5 planning and capacity-building recipients—are participating in or preparing to implement the demonstration.

This 2026 iteration proposes to reduce reporting burden and improve reporting consistency by introducing a revised and streamlined Semi-Annual Progress Report template. It also incorporates revisions to the MFP Work Plan template to align with statutory requirements established under the CAA, 2021. Additionally, revisions to the MFP Financial Reporting Form (previously referred to as the ABCD Financial Report) are intended to promote consistency and standardization across program reporting requirements and to align financial data collection with the structure of the Semi-Annual Progress Report and Work Plan. We are also proposing revisions to the MFP Operational Protocol.

Overall, this iteration would reduce our active time estimate by 370 hours (see section 15 for details).

A. Justification

1. Need and Legal Basis

Under section 6071(c) of the DRA, the Secretary may require states and territories to provide additional information and assurances necessary to operate the MFP Demonstration. Section 204(c)(7)(B)(iii) of the CAA, 2021, requires recipients to submit an annual MFP Work Plan including funding sources, evaluation strategies, and sustainability plans. Section 204(c)(13)(B) requires quarterly reporting on the use of grant funds for activities described in the Work Plan.

2. Information Users

CMS Project Officers and federal staff use the information collected to monitor compliance with statutory requirements, assess progress toward transition benchmarks, evaluate use of grant funds, and support audit and oversight functions.

3. Improved Information Technology

The MFP Work Plan and Semi-Annual Progress Reports are submitted to CMS via a web-based platform.

The MFP Financial Reporting Form will now also be submitted to CMS through the same web-based platform.

4. Duplication/Similar Information

This information collection does not duplicate any other effort, and the information cannot be obtained from any other source.

5. Small Business

This request does not affect small businesses.

6. Less Frequent Collection

The MFP Work Plan is developed and updated annually, or more frequently as needed. Revisions to the Work Plan should be submitted in conjunction with the Work Plan submission. Requests for changes to quarterly transition targets can only occur annually from July to August. CMS anticipates changes will be less frequent than twice a year but aims to provide grantees with the ability to adapt to challenges and refine objectives for the demonstration efficiently.

MFP grant recipients must amend the Operational Protocol (OP) as necessary, but no less frequently than every three years. In particular, the OP must be amended when there are changes in federal or state law, regulation, or policy affecting MFP eligibility, enrollment, or program operations, or when responding to new needs that affect MFP operations, including changes to any required OP elements. All OP amendments are subject to CMS approval.

Recipients submit MFP Semi-Annual Progress Reports on a semi-annual basis. If the collection of this information is not conducted or is conducted less frequently, the ability to effectively monitor the grant program may be compromised. CMS considers the semi-annual collection of the MFP Semi-Annual Progress Reports as representing the minimal collection effort required to achieve the basic monitoring elements of the programs. States and territories are required to submit the MFP Financial Reporting Form quarterly.

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 Notice/Outside Consultations

Our 60-day notice published in the Federal Register on May 20, 2026 (91 FR 29497) Comments were due on/by July 20, 2026. One comment was received and is attached to this collection of information request along with a separate response to the comment. In sum, we are not proposing any additional actions as a result of the comment.

Our 30-day notice published in the Federal Register on September 2, 2026 (91 FR 56447) Comments must be received on/by October 2, 2026.

9. Payment/Gift to Respondent

This collection of information does not provide for any additional payment or any gifts to the state. States are reimbursed for a portion of MFP administrative expenses and required to submit financial reports.

10. Confidentiality

States shall ensure that all Federal and State laws that protect the confidentiality of medical information will be enforced.

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. Burden Estimates

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 (http://www.bls.gov/oes/current/oes_nat.htm). 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.

Occupation Title	Occupation Code	Mean Hourly Wage (\$/hr)	Fringe Benefits and Other Indirect Costs (\$/hr)	Adjusted Hourly Wage (\$/hr)
Executive Secretaries and Executive Administrative Assistants	43-6011	38.05	38.05	76.10

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. We believe that doubling the hourly wage to estimate total cost is a reasonably accurate estimation method.

Information Collection Requirements and Associated Burden Estimates

As of April 2026, there are 41 active MFP Demonstration grant recipients, including states, the District of Columbia, and territories. This includes 5 grant recipients that received planning and capacity-building funding to implement the MFP Demonstration. The CAA, 2023, extended funding for the MFP Demonstration through fiscal year 2027, supporting continued operation and expansion of these programs.

Maintenance of Effort Form: We estimate it would take 8 hours at \$76.10/hr for an executive administrative assistant to complete the Maintenance of Effort form. In aggregate, we estimate an annual burden of 328 hours (41 recipients x 8 hr) at a cost of \$24,961 (328 hr x \$76.10/hr).

Form(s) include:
MFP_MOE_Form.pdf

MFP Financial Reporting Form: We estimate it would take 5 hours at \$76.10/hr for an executive administrative assistant to collect the quarterly financial information and have this information readily available to complete the MFP Financial Reporting Form. In aggregate, we estimate an annual burden of 820 hours (41 recipients x 5 hr x 4 quarters) at a cost of \$62,402 (820 hr x \$76.10/hr).

Form(s) include:
MFP Financial Reporting Form

Federal Financial Report (SF-425): Please note SF-425 forms are required under this CMS-10249 information collection request, but no revisions are being made to that form. To avoid duplication, we are not setting out such burden since the standard form is currently approved by OMB under control number 4040-0014.

Form(s) include:
SF-425

The MFP Budget Workbook: We estimate it would take 24 hours at \$76.10 for an executive administrative assistant to collect the information for the MFP Budget Workbook form and complete the form. In aggregate, we estimate an annual burden of 984 hours (41 recipients x 24 hr x 1 report/year) at a cost of \$74,882 (984 hr x \$76.10/hr).

Form(s) include:
MFP_Budget_Workbook

MFP Semi-Annual Progress Report: Recipients will submit progress reports on a semi-annual basis. We expect that it will take each recipient 2.5 hours at \$76.10/hr for an executive administrative assistant to complete each period's report. We estimate an annual burden of 205 hours (41 recipients x 2.5 hr/report x 2 reports/year) at a cost of \$15,601 (205 hr x \$76.10/hr).

Form(s) include:
MFP_Semi-Annual_Final
MFP_Semi-Annual_Progress_RPT_Help_File

MFP Work Plan: Recipients will submit an initial Work Plan and amend it annually, or as needed. We expect that it will take each recipient 2 hours at \$76.10/hr for an executive administrative assistant to complete the initial report. We estimate an initial burden of 82 hours (41 recipients x 2 hr x 1 reports) at a cost of \$6,240 (82 hr x \$76.10/hr).

Form(s) include:
MFP_Work_Plan
MFP_Work_Plan_Help_File

Operational Protocol Template: Recipients must review and amend the OP as appropriate every 3 years, or more frequently as needed.

We expect it will take each recipient 40 hours at \$76.10/hr for an executive administrative assistant to amend or newly develop the OP according to the new template. We estimate an initial burden of 1,640 hours (41 recipients x 40 hr x 1 report) at a cost of \$124,804 (1,640 hr x \$76.10/hr) to complete the OP template.

We expect it will take each recipient 14 hours at \$76.10/hr for an executive administrative assistant to complete an annual amendment of the OP. We estimate a burden of 574 hours (41 recipients x 14 hr x 1 report) at a cost of \$43,681 (574 hr x \$76.10).

In sum, we estimate a burden of 2,214 hours (1,640 hr + 574 hr) and \$168,485 (\$124,804 + \$43,681).

Form(s) include:

MFP_Operational_Protocol_Template

Summary of Annual Recordkeeping and Reporting Requirements

Reporting	Respondents	Responses (per Respondent)	Total Responses	Time per Response (hours)	Total Time (hours)	Labor Cost (\$/hr)	Total Labor Cost (\$)
Maintenance of Effort Forms (annual)	41	1	41	8	328	76.10	24,961
MFP Financial Reporting Form	41	4	164	5	820	76.10	62,402
MFP Budget Workbook	41	1	41	24	984	76.10	74,882
MFP Semi- Annual Progress Report	41	2	82	2	205	76.10	15,601
MFP Work Plan	41	1	41	2	82	76.10	6,240
MFP Operational Protocol Template	41	1	82	varies	2,214 (1,640 + 574)	76.10	168,485 (\$124,804 + \$43,681)
TOTAL	41	varies	451	varies	4,633	76.10	352,571

Information Collection Instruments and Instruction/Guidance Documents

MFP_MOE_Form.pdf (No changes)

MFP_Budget_Workbook (Revised) - MFP-Budget-Workbook-2023.pdf

MFP Work Plan (Revised) - MFP_WP_Initiative Data Entry-508 Compliant.pdf

MFP Semi-Annual Progress Report (Revised) - MFP_SAR - Initiative Single Page-508
Compliant.pdf

MFP Operational Protocol (Revised) - MFP-Operational-Protocol.pdf

MFP Financial Reporting Form (Revised) -

- MFP_FRF_ABCD Totals.pdf-508 Compliant.pdf

- MFP_FRF_Administrative costs_Add Sub Recipient.pdf-508 Compliant.pdf

- MFP_FRF_Administrative costs_Error.pdf-508 Compliant.pdf

- MFP_FRF_Demonstration services_default.pdf-508 Compliant.pdf

- MFP_FRF_FMAP_default.pdf-508 Compliant.pdf

- MFP_FRF_FMAP_Error.pdf-508 Compliant.pdf

- MFP_FRF_General info_default.pdf-508 Compliant.pdf

- MFP_FRF_Qualified HCBS_default.pdf-508 Compliant.pdf

- MFP_FRF_Supplemental services_1 Other added.pdf-508 Compliant.pdf

CMS 64i Expenditure Forms.pdf (Removed)

MFP-Semi-Annual-Rprt-Help-File.pdf (Removed)

MFP-Work-Plan-Help-File.pdf (Removed)

SF-425 (This is a non-CMS standard form that is approved by OMB under control number 4040-0014.)

13. Capital Costs

There are no capital costs.

14. Cost to Federal Government

The hourly rate for a GS-13 Step 4 employee is approximately \$47.93/hr based on the 2026 General Schedule (GS) base pay table. CMS applies a 100 percent loading factor to account for fringe benefits and overhead, resulting in an adjusted hourly rate of \$95.86/hr.

Annually, CMS staff financial reports, we estimate \$15,721 for the federal Cost (41 recipients x 4 financial reports per year x 1 hour x \$95.86/hr for a GS-13 Step 4). For review of the MFP Semi-Annual Progress Report, we estimate \$7,861 for the federal cost (41 recipients x 1 hour to review per report x 2 reports/ year x \$95.86/hr for a GS-13 Step 4). For review of the MFP Work Plan, we estimate \$3,930 for the federal cost (41 recipients x 1 hour to review per report x \$95.86/hr for a GS-13 Step 4). In aggregate, we estimate a cost of \$27,512 (\$15,721 + \$7,861 + \$3,930).

15. Program/Burden Changes

This information collection reflects updated burden estimates based on 41 MFP Demonstration grant recipients, including states, the District of Columbia, and territories. Overall, this iteration would reduce our active time estimate by 370 hours.

Reporting	2023 Iteration		2026 Iteration		Difference (hours)
	Respondents	Total Annual Time (hours)	Respondents	Total Annual Time (hours)	
Maintenance of Effort Forms (annual)	41	328	41	328	0
MFP Budget Workbook	41	984	41	984	0
MFP Semi-Annual Progress Report	41	205	41	205	0
Quarterly ABCD Financial Forms	41	984 (164 resp x 6 hr/resp)	41	820 (164 resp x 5 hr/resp)	(164)
MFP Work Plan	41	124 (41 resp x 3 hr/resp)	41	82 (164 resp x 5 hr/resp)	(42)
MFP OP Template	41	2,378 (41 resp x 58 hr/resp)	41	2,214 (82 resp x 27 hr/resp)	(164)
TOTAL	41	5,003	41	4,633	(370)

Other changes include:

- MFP Work Plan (Revised)

The revised Work Plan template clarifies statutory elements, strengthens alignment with transition benchmarks, and improves sustainability reporting while reducing duplicative content.

- MFP Semi-Annual Progress Report (Revised)

The Semi-Annual Progress Report has been streamlined to remove redundant narrative sections, integrate Work Plan reporting, eliminate the Additional Benchmark Addendum, and improve consistency across recipients.

- MFP Financial Reporting Form (Clarified)

Recipients will continue to submit the MFP Financial Reporting Form. The form has been converted from an Excel-based spreadsheet to an electronic format; no substantive changes to reporting requirements have been made.

- MFP Operational Protocol (Revised)

Section K of the MFP Operational Protocol has been removed. This revision is intended to reduce reporting burden by eliminating non-essential reporting requirements while maintaining the integrity of program oversight and compliance.

While revised reporting tools (e.g., the Work Plan and Operational Protocol templates) have been introduced, these changes are partially offset by reductions in burden resulting from the streamlining and refinement of existing reporting requirements.

16. Publication and Tabulation Dates

N/A

17. Expiration Date

CMS does not oppose the display of the expiration date.

18. Certification Statement

There are no exceptions to the certification statement.

B. Collections of Information Employing Statistical Methods

This question is no longer applicable as the survey is no longer needed.