

JUSTIFICATION FOR A NONSUBSTANTIAL CHANGE
Generic Clearance for Medicaid and CHIP State Plan,
Waiver, and Program Submissions
CMS-10398, OMB 0938-1148

Timeline

This October 2026 request is urgent. CMS is requesting OMB approval of this change as soon as possible.

The urgency (specifically, the need to increase our burden ceiling) is in response to our short-term needs. We intend to address our mid/long-term needs through the traditional 60-/30-day PRA process.

The urgency also reflects a change of methodology for anticipating our upcoming needs. While our initial methodology met our needs from 2011 – the present, we now recognize that our initial methodology is no longer viable for anticipating our upcoming needs.

What We Are Doing

We propose to increase our currently approved umbrella’s burden ceiling by 10,000 hours (from 1,562,707 to 1,572,707 hr).

Why Are We Doing It

The methodology used in our most recent update to this information collection (August 2026), which increased the burden in response to the demands of our June 3, 2026, Community Engagement interim final rule with comment period (CMS-2454-IFC, RIN 0938-AV98) is outdated. This October 2026 request aims to address those deficiencies in two phases. The first phase requests this 10,000-hour increase through the non-substantive change PRA process. The second phase, which we are initiating simultaneously, will address our need for a larger (TBD) increase through the traditional 60-/30-day PRA process.

As demonstrated below, our 1,562,707-hour ceiling will be reached by our pending collection of information submissions in the near-term. The increase that is the focus of this change request is needed since our current ceiling is near that threshold.

Collections (as of 10/21/2026)	
Current Burden Ceiling (A)	1,562,707
Active Individual Collections (B)	(1,467,652)
Individual Collections In ROCIS	

ROCIS (GenIC #34)	(5)
ROCIS (GenIC #48)	(94,984)
<i>Subtotal: Individual Collections in ROCIS (C)</i>	<i>(94,989)</i>
Upcoming Individual Collections	
In Progress (GenIC #37)	(1,233)
In Progress (GenIC #95)	(2,480)
In Progress (GenIC #97)	(168)
In Progress (GenIC #98)	(62)
In Progress (GenIC #102)	(280)
<i>Subtotal: Upcoming Collections (D)</i>	<i>(4,223)</i>
TOTAL SHORTFALL (A – B – C – D)	(4,157)

We request an increase of 10,000 hours to cover the 4,157 hour shortfall and other individual collections over the next few months, while we update the overall package to better reflect CMS' needs.

Why This Is a Non-Substantive Change

With the exception of increasing the umbrella's burden ceiling, we are not proposing any other changes to our umbrella's overarching Supporting Statement. This includes the parameters that qualify individual collections under the generic PRA process.

Similarly, we are not proposing to add any new individual collections, revise any of our currently approved individual collections, or discontinue any of our currently approved individual collections.

In this regard, the 10,000 hour increase is non-substantive since there are no material or program changes.

Burden Impact

With the exception of increasing the umbrella's burden ceiling by 10,000 hours, all of our

currently approved individual collections' requirements and burden estimates are unaffected by this request.

Collection of Information Instruments

All of our individual collections' reporting instruments and instructions are unaffected by this request.