

0985-0005	202108-0985-001	08/10/2021	HHS/ACL	State Annual Long-Term Care Ombudsman Report
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ACL Response to OIRA pass back RE: Changes in burden

This reinstatement is without change, the burden decreases from 11,628 annual burden hours to 11,153 for a total decrease of -475 annual burden hours reflects the reality of upgrades to the reporting system. ACL believes the burden change stems primarily from an adjustment in burden hours based on upgrades to the reporting system. Additionally, the type of minor changes to the IC are based on formatting, FY reporting language updates and or feedback from respondents. ACL considers these types of changes as non-substantive and base the decrease in annual burden on an adjustment from actual usage of the IC in the first one or two reporting years and before any reporting system updates that likely minimized burden to respondents.

A.12

The hour burden is based on the number of cases managed by the nationwide Long-Term Care Ombudsman Program (LTCOP), consisting of the 50 states plus the District of Columbia and Puerto Rico, in the most recent year for which data is available. Closed cases reported by the 52 state Ombudsman programs for FFY 2019 was 123,815. Based on average time required by early pilot states to document a case by computer (10 minutes), total documentation time is calculated by multiplying total cases by 10 minutes, totaling 1,238,630 minutes, divided by 60 = 20,644 hours of paid Ombudsman program time. Previous estimates determined that about, about two-thirds of the information entered for a typical case is for use at the state level and is not required for the ACL report. However, based on state Ombudsman feedback, ACL assumes that half of the estimate of 10 minutes is needed to document data needed for the ACL report.

Estimates on completion of other parts of the report are based on experiences from state Ombudsman programs. For example, states estimate that they spend anywhere from 4 hours to 4 days checking and verifying data from the local programs and compiling their annual report to AoA. Improved technology, which either allows for or requires the uploading of data files will populate the case and complaint data and increase the consistency and reliability of data, thereby reducing burden associated with manually entering data. Thus, a fair estimate of the average burden for a state is 16 hours of stafftime at the Office of the State Ombudsman.