

Generic Supporting Statement
Medicaid/CHIP School-Based Services (SBS) Grants
(CMS-10398 #88, OMB 0938-1148)

This November 2024 iteration is a New collection of information request.

A. Background

The Centers for Medicare & Medicaid Services (CMS) is committed to increasing access to health care services in ways that can narrow disparities in rates of care, promote quality education and achievement, and build a reliable system of support for every young person. This commitment recognizes research that consistently demonstrates a positive link between scholastic attainment and improved health outcomes while also acknowledging that the educational environment is an optimal place to promote wellbeing.

Schools are uniquely positioned to help increase health equity and to help ensure that all children, including adolescents, have access to necessary health care services. Although schools are primarily providers of education, the school setting provides a unique opportunity to: enroll eligible children and adolescents in Medicaid and the Children's Health Insurance Program (CHIP); deliver covered services, including behavioral health services (mental health and substance use disorder (SUD) services) to eligible children; and help children who are enrolled in Medicaid or CHIP access the services they need.

School-based services (SBS), which are Medicaid or CHIP-coverable services provided to children and adolescents in a school setting, play an important role in the health and well-being of children and adolescents, particularly for those enrolled in the Medicaid or CHIP programs.

The Bipartisan Safer Communities Act (BSCA) (Section 11003(b)) authorized \$50,000,000 for the Secretary to award grants to States for the purpose of implementing, enhancing, or expanding the provision of assistance through school-based entities under Medicaid and CHIP. This initiative provides funding support to bolster State and local infrastructure for the provision, billing, and claiming of Medicaid and CHIP SBS programs. Medicaid and CHIP cover many services provided through schools to students enrolled in Medicaid. This includes services provided by school-based health centers, which can significantly improve key health and educational outcomes among students. With the funding from this grant, States will be able to strengthen their SBS programs, and provide an overall greater quality of services to their students.

B. Description of Information Collection

As stated above, the primary purpose of this initiative is to provide funding support to bolster State and local infrastructure for the provision, billing, and claiming of Medicaid and CHIP SBS programs. To measure this aspect of grantee performance, grantees are required to report the following data elements on a quarterly basis:

- Total Number of Students

- Total Number of Students with IEPs
- Number of Medicaid Enrolled Students, Medicaid-Enrolled Students with IEPs
- Number of Medicaid Enrolled Students, Medicaid-Enrolled Students with 504 Plans
- Number of Medicaid Enrolled Students, Other Medicaid-Enrolled Students
- Number of Medicaid Enrolled Students, Total
- Number of CHIP-Enrolled Students, CHIP-Enrolled Students with IEPs
- Number of CHIP-Enrolled Students, CHIP-Enrolled Students with 504 Plans
- Number of CHIP-Enrolled Students, Other CHIP-Enrolled Students
- Number of CHIP-Enrolled Students, Total
- Number of Medicaid Services Received by Medicaid Enrollees, Behavioral Health
- Number of Medicaid Services Received by Medicaid Enrollees, Nursing
- Number of Medicaid Services Received by Medicaid Enrollees, Rehab, Physical, Occupational, or Speech Therapy
- Number of Medicaid Services Received by Medicaid Enrollees, Specialized Transportation
- Number of Medicaid Services Received by Medicaid Enrollees, Other
- Number of CHIP Services Received by CHIP Enrollees, Behavioral Health
- Number of CHIP Services Received by CHIP Enrollees, Nursing
- Number of CHIP Services Received by CHIP Enrollees, Rehab, Physical, Occupational, or Speech Therapy
- Number of CHIP Services Received by CHIP Enrollees, Specialized Transportation
- Number of CHIP Services Received by CHIP Enrollees, Other

All grantees will be reporting this data based on specified date ranges and school districts. Receiving this data on a quarterly basis will allow CMS to provide prompt technical assistance to lower performing grantees and, if necessary, place lower performing grantees on a performance improvement plan.

State Grants for the Implementation, Enhancement, and Expansion of Medicaid and CHIP School-Based Services Cooperative Agreements

On January 24, 2024, CMS released a funding opportunity announcement (FOA) to award \$50,000,000 for grants available to all State governments, specifically State Medicaid Agencies. These grants fund activities designed to implement, enhance, and expand the provision of assistance through school-based entities under Medicaid and CHIP. For the \$50 million allocated by Congress through the BSCA, on June 25, 2024, CMS awarded 18 cooperative agreements in 18 states totaling up to \$50 million over a 3-year period.

The period of performance for these cooperative agreement awards will be from July 1, 2024, to June 30, 2027. Cooperative agreement funding is disbursed in three separate budget periods with the succeeding budget year funding dependent on grantee performance in the previous year. Grantees must provide progress updates documented in the required quarterly reports. The award terms and conditions require grantees to submit reports on a timely basis, with the first report due to CMS by October 31, 2024.

Quarterly Report Schedule

Quarter	Reporting Period End Date	Quarterly Progress Report Due Date
Q1	September 30	October 31
Q2	December 31	January 31
Q3	March 31	April 30
Q4	June 30	July 31

Annual Narrative and Data Reporting Schedule

Reporting Year	Reporting Period End Date	Annual Narrative and Data Report Due Date
Year 1	December 31, 2024	January 30, 2025
Year 2	December 31, 2025	January 30, 2026
Year 3	December 31, 2026	January 30, 2027

Annual Federal Financial Report (FFR) Schedule

Budget Period	Reporting Period End Date	FFR Due Date
Budget Period 1	June 30, 2025	September 28, 2025
Budget Period 2	June 30, 2026	September 28, 2026
Budget Period 3 (Final)	June 30, 2027	October 28, 2027

Final Report Schedule

Reporting Year	Reporting Period End Date	Annual Progress Report Due Date
Year 3, Final Report	June 30, 2027	October 28, 2027

In addition to the quarterly and annual budget reporting requirements, States, in alignment with their Terms and Conditions, will be providing updates on their grant performance activities. These updates range from being required semi-annually to annually and will help determine the progress being made by each of the State grantees.

C. Deviations from Generic Request

No deviations are requested.

D. Burden Estimates

Wage Estimates

To derive average costs, we used data from the U.S. Bureau of Labor Statistics' May 2023

National Occupational Employment and Wage Estimates for all salary estimates https://www.bls.gov/oes/2023/may/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.

BLS’s wage estimates are updated annually. Current wage figures can be found at http://www.bls.gov/oes/current/oes_nat.htm and can be used to calculate current cost estimates. May 2023 (see above) 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)
Community and Social Service Occupations	21-0000	28.36	28.36	56.72

As indicated, we are adjusting our employee hourly wage estimates by a factor of 100 percent. This is a necessary rough adjustment, both because fringe benefits and overhead 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.

Annual Burden Estimates

For this grant, recipients will be required to submit both narrative and data related reports. The attached template will be provided to all recipients for the data collection portion.

Narrative reports will be based specifically on the elements of the Program Terms and Conditions of this grant award, which grantees can address on a form of their choosing.

The annual burden for the Quarterly Progress Report is 432 hours (6 hr/response x 18 grantees x 4 responses/year) at a cost of \$24,503 (432 hr x \$56.72/hr).

The annual burden for the Annual Narrative and Data Report is 432 hours (24 hr/response x 18 grantees x 1 report/year) at a cost of \$24,503 (432 hr x \$56.72/hr).

The annual for burden for the Annual Federal Financial Report is 270 hours (15 hr/response x 18 grantees x 1 per year reporting period) at a cost of \$15,314 (270 hr x \$56.72/hr). [See Below Chart]

The burden for the one-time Final Report is annualized over three years as 144 hours (24 hr/response x 18 grantees x 1 response / 3 years) at a cost of \$8,168 (144 hr x \$56.72/hr).

Burden Summary

Report Type	No. Respondents	Total Responses	Time per Response (hours)	Total Annual Time (hours)	Labor Cost (\$/hr)	Total Cost (\$)
Quarterly Progress Reports	18 States	72 (18 grantees x 4 responses/year)	6	432	56.72	24,503
Annual Narrative and Data Report	18 States	18 (18 grantees x 1 response/year)	24	432	56.72	24,503
Annual Federal Financial Report	18 States	18 (18 grantees x 1 response/year)	15	270	\$56.72	15,314
Final Report	18 States	6 (18 grantees x 1 response/3 years)	24	144	56.72	8,168
Total	18 States	114	Varies	1,278	56.72	72,488

Information Collection Instruments and Instruction/Guidance Documents

SBS Grant Data Submission and TAC Participation Form

Tab 1: Overview & Instructions – Provides an overview of the data to be submitted in each tab contained in the form and a description of the purpose of the form. The form is intended for Grantees of the Implementation, Enhancement, and Expansion of Medicaid and CHIP School-Based Services Grant to submit required information in the annual report for the Data Activity and semi-annual report for the Technical Assistance Center (TAC) Participation Activity (Cooperative Agreement Activities – General Activities) described in the Program Terms and Conditions. This tab is only related to the annual reporting of data in the Data Submission tab and semi-annual reporting of data in the TAC Participation tab (see the following Table). This tab does not require data entry and is purely informational.

Tab 2: Data Dictionary – Provides detailed descriptions of each data field on the Data Submissions tab and TAC Participation tab in the form along with recommended data sources for Grantees to collect the information from to submit on each tab. This tab is only related to the annual reporting of data in the Data Submission tab and semi-annual reporting of data in the TAC Participation tab (see the following Table). This tab does not require data entry and is purely informational.

Tab 3: Attestation – Requires an electronic signature from a state official certifying that information

submitted in the form is true accurate and complete, familiarity with the Program Terms and Conditions, and the structure of the template has not been altered. This tab is required to be completed for annual reporting of data in the Data Submission tab and semi-annual reporting of data in the TAC Participation tab (see the following Table).

Tab 4: Data Submissions – Grantees are required to submit an analysis of their data plans at the end of the 2nd Quarter of Budget Period 1, reporting due by January 30, 2025, then updating the analysis annually thereafter, due 30 days after the end of the 2nd Quarter, by January 30th, of each Budget Period as required by the Program Terms and Conditions included with each Grantee's Notice of Award issued on June 25, 2024. This tab is required to be completed for annual reporting of data in the Data Submission tab (see the following Table).

Tab 5: TAC Participation – Grantees are required to submit an analysis of their Technical Assistance Center participation at the end of the 2nd Quarter, due by January 30th, and at the end of the 4th Quarter, due by July 30th, of each Budget Period as required by the Program Terms and Conditions included with each Grantee's Notice of Award issued on June 25, 2024. This tab is required to be completed for semi-annual reporting of data in the TAC Participation tab (see the following Table).

Report Type	Tab 1 Overview & Instructions	Tab 2 Data Dictionary	Tab 3 Attestation	Tab 4 Data Submissions	Tab 5 TAC Participation
Quarterly Progress Reports	N	N	N	N	N
Annual Narrative and Data Report	Y	Y	Y	Y	Y
Annual Federal Financial Report	N	N	N	N	N
Final Report	Y	Y	Y	Y	Y

E. Timeline

The 14-day notice published in the Federal Register on November 5, 2024 (89 FR 87879). Comments must be received by November 19, 2024.

The State Grants for the Implementation, Enhancement, and Expansion of Medicaid and CHIP

School-Based Services cooperative agreements, awarded for a three-year period, supports the increase of SBS services, as well as CMS, anticipates that the quantitative information collected through the quarterly progress report responses and the qualitative information collected through the annual report responses together will allow for a more complete synthesis of program results.

Another benefit is that this will allow for a more efficient data collection process for the evaluation contractor. With this data provided on a timelier basis, the evaluator can produce a more accurate and effective evaluation of grant outcomes and strategies.