

## **Supporting Statement A**

### **CMS Meeting Request Public Portal**

#### **Contact Information:**

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## **Background**

External organizations frequently request meetings with the Centers for Medicare & Medicaid Services (CMS) Administrator to discuss various topics, such as programs and policy issues under CMS jurisdiction. Requests come to CMS daily from a myriad of sources. Sources include representatives of corporations (including Chief Executive Officers), lobbying firm or public relations partners representing healthcare clients, Executive branch agency staff (current and former), professional contacts of the Administrator, former political appointees, inventors, venture capitalists, individual CMS program beneficiaries, and members of Congress (current and former). Although each request may enter CMS through different channels, the majority currently arrive via email, with far fewer received by postal mail.

CMS currently has a downloadable form on its website<sup>1</sup> that external organizations and other interested parties use to request meetings with the Administrator. CMS is seeking to turn this manual form into an electronic portal for the efficient collection and management of information to support our external meeting request process.

CMS staff oversees the administrative function for collecting, triaging, and tracking all incoming requests addressed to the Administrator and works directly with the immediate office of the administrator to adjudicate all requests. In calendar year (CY) 2025, CMS received 465 requests from external stakeholders to meet with the Administrator.

When an interested party requests a meeting with the Administrator, CMS requires specific information to determine whether the meeting would be timely, relevant, ethically permissible, productive, and in the interest of the federal government. CMS requests the following details from requestor: the name and title of the requesting individual, the organization's address, the suggested attendees, the proposed topic and timeframe, and if any attendee is a foreign national. If an organization is requesting a meeting on behalf of another entity or coalition, such as a public relations or lobbying firm representing a client, the request must include the same information: name, title, organization address, topic, timeframe, along with a disclosure of the lobbying relationship. Failure to provide the requested information will result in CMS's inability to process and act on an entity's request.

## **Justification**

### **1. Need and Legal Basis**

CMS is seeking approval to streamline the process for entities requesting external meetings. The proposed CMS Meeting Request Portal will gather only necessary information for representatives of the organization to meet with a representative of the federal government. This simplified approach aims to reduce administrative burden while enhancing transparency and accountability in meeting requests. By focusing on essential information, CMS ensures that the evaluation and screening process for private requests remains efficient and centered on logistics, scheduling, and conflict of interest.

The proposed information collection aligns with CMS's commitment to stakeholder engagement while ensuring compliance with all applicable federal laws, regulations, and security protocols. The collection of information from public organizations seeking meetings with the Administrator is justified under

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<sup>1</sup> <https://www.cms.gov/files/document/cms-meeting-request>.

several federal authorities and operational necessities:

### **Federal Security Requirements**

- Homeland Security Presidential Directive 12 (HSPD-12) Compliance: CMS operates under HSPD-12 requirements for personnel identity verification and facility access control.
- Federal Information Security Modernization Act (FISMA) Obligations: FISMA mandates security protocols for all federal facilities and personnel interactions.
- Physical Security: CMS Electronic Security System requirements necessitate advance screening of all visitors to ensure facility security and personnel safety.

### **Administrative Efficiency and Resource Management**

Given the Administrator's limited availability, information collection enables proper prioritization based on relevance to CMS's mission and priorities, potential impact on Medicare and Medicaid beneficiaries and Marketplace customers, alignment with current policy initiatives, and organizational credibility and standing.

### **Transparency and Accountability**

- Public Record Requirements: Federal agencies must maintain records of external meetings for transparency and oversight purposes.
- Ethics Compliance: Information collection helps ensure compliance with federal ethics regulations and conflict of interest requirements.
- Congressional Oversight: Detailed meeting records support CMS's accountability to Congress and other oversight bodies, if and when they would be requested.

### **Specific Information Collection Justifications**

#### Organizational Information:

- Organization Name and Type: Necessary for security clearance and meeting preparation.
- Attendee Information and citizenship/foreign national disclosure: Required for security protocols and meeting logistics, including determining whether the attendee has a peer-to-peer professional relationship aligning with the Administrator's rank in the organization.
- Contact Information: Essential for coordination and follow-up communications.
- Disclosure if a member of a lobbying firm: required by the Lobbying Disclosure Act of 1995 (P.L. 104-65).

#### Meeting Purpose and Content:

- Topics: Ensures alignment with CMS statutory responsibilities, enables proper preparation (including who from CMS should attend) and ensures productive use of the Administrator's time. Also helps determine appropriate CMS staff participation and follow-up actions.
- Supporting Materials: Allows for advance review and informed discussion, including if there are any ethics implications of what would be discussed.
- Stakeholder Impact: Demonstrates relevance to CMS beneficiaries and programs.

#### Participant Information:

- Attendee Names and Titles: Required for facility access and security protocols.
- Background Information: Necessary for security clearance and conflict of interest screening.
- Previous CMS Interactions: Provides context for ongoing relationships and commitments and helps CMS track frequency of interaction with government officials for recordkeeping purposes.

Can influence OA's disposition of additional incoming meeting requests from the same participant/s.

#### Privacy and Data Protection Measures:

CMS maintains privacy protections for collected information. There is limited access to the completed information in the portal, the information provided by outside entities is restricted to authorized staff with legitimate need-to-know. The retention policy of the data is maintained as long as operationally necessary and in compliance with federal records requirements. There are also security controls in place because the information provided is protected under CMS's comprehensive cybersecurity framework.

## 2. Information Users

The information will be collected solely from organizations and third-party requestors, such as law firms or other entities acting on behalf of organizations, that seek a meeting with the Administrator. The implementation of an online portal will facilitate the ease and efficiency of submitting requests. Requestors will have the capability to securely enter their requests electronically through this portal. Information collection is voluntary, whether or not it is provided through the portal or via a letter, but no matter how it is submitted to CMS, failure to provide the requested information will result in CMS's inability to review, process, and/or act on the request.

The data collected via the portal will be used by CMS to adjudicate meeting requests. The uses for this data are limited to the following administrative purposes: disposition of meeting (deciding whether or not to accept, delegate, or decline the meeting request), managing meeting logistics and scheduling coordination; gathering basic organizational information for preparation; conducting conflict of interest and ethics screening when necessary; and performing follow-up activities for accountability. CMS does not require organizations to submit information beyond what is essential. All data collected are subject to privacy and confidentiality requirements and serve legitimate governmental purposes.

Requestors will be assigned a confirmation number for their request when they submit it. They will also receive an acknowledgement email corresponding to their request that confirms that CMS received their submission.

## 3. Use of Information Technology

Currently, CMS receives requests manually (i.e., a letter) and electronically (email). For manual requests, postal mail is received by a central facility. It is either opened and scanned in at point of receipt in Baltimore, MD, or it is addressed to Washington, DC, and opened there by CMS staff. Either way, a SWIFT (Strategic Work Information Folder Transfer) case folder is opened for the letter. CMS career staff read the letter and determine if the author is requesting a meeting with the Administrator. If the author specifically requests a meeting in the text of their letter to the Administrator, then that case is queued up to be processed and evaluated as a meeting request. If the author's incoming letter seeks a written response (the default assumption), then it is processed through the established correspondence process.

A public portal allows for a more efficient and secure way to submit requests electronically. It ensures confidentiality, integrity, and availability of requests while complying with applicable security regulations, policies, standards and controls. By establishing a secure public facing portal

to receive the Administrator's meeting requests, CMS is able to accomplish the following:

- a) Avoid duplicate meeting requests, through entities using multiple channels to gain access to the Administrator (repeating requests while a request is in process)
- b) Minimize the need to manually enter these requests into the CMS centralized document management system, which is the CMS SWIFT system.
- c) Ensure every request is channeled to the OA for disposition (accept the meeting, delegate the meeting, decline the meeting) and treated fairly and similarly.
- d) Route requests to the appropriate level of CMS policy official rapidly.

This information is not currently available for completion electronically. Currently, external entities fill out a meeting request form and submit the completed form through email, or they submit a request via email without completing a form. The meeting request submission does not require a signature from the requestor. Except as noted below under Less Frequent Collection, data collection will become electronic once the CMS Meeting Request Portal is approved.

#### 4. Duplication of Efforts

This information collection does not duplicate other efforts and the information cannot be obtained from another source.

#### 5. Impact on Small Businesses and Other Small Entities

Automating the External Meeting request process will improve customer service, reduce errors, minimize or eliminate duplicate requests, and ensure proper routing of requests. This would significantly benefit the small business community through increased efficiency and timeliness of processing requests. All requests will be processed similarly and equally, no matter the size of the organization.

#### 6. Less Frequent Collection

CMS would continue to receive meeting requests for the Administrator via mail and email and would use government resources to manually enter these requests into the CMS SWIFT document management system where it could. Where requests are received via mail or email that are incomplete, CMS would need to reach out to the requestor to either 1) provide the missing information to the federal staff to enter in the portal, or 2) the federal staff would provide the portal link to the requestor to fill out the information themselves.

#### 7. Special Circumstances

Explain any special circumstances that would cause information collection to be conducted in a manner.

- requiring respondents to report information to the agency more often than quarterly;
- requiring respondents to prepare a written response to a collection of information in

fewer than 30 days after receipt of it;

- requiring respondents to submit more than an original and two copies of any document;
- requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;
- 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;
- requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
- that includes 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
- requiring respondents to 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.

None of the aforementioned special circumstances are applicable to this information collection request.

#### 8. Federal Register Notice/Outside Consultation

##### Federal Register Notices

The 60-day notice published on January 20, 2026 (91 FR 2360). No comments were received.

The 30-day notice published on May 8, 2026 (91 FR 25361).

##### Outside Consultation

CMS staff also searched the internet to see how other Cabinet level agencies process external meeting requests for their political appointees.

Based on the findings and recommendations of the project team, the ability to submit requests online proved to be a step in the right direction to gain some efficiency.

#### 9. Payments/Gifts to Respondents

There are no payments or gifts associated with these requests. Respondents often get the outcome they requested, which is a meeting with the Administrator, Chief of Staff, or another CMS official.

#### 10. Confidentiality

Records are electronically maintained in an existing Privacy Act System of Records, which provides

Privacy Act protections pursuant to 5 U.S.C. §552a.

Note that our data collection specifically excludes the Social Security Number.

This online portal requires requestors to provide the requestor's and recommended meeting attendee's name/s, title, company name/s, and, if the potential attendee is a foreign national. If the requestor answers the foreign national question in the affirmative, that a potential meeting attendee is a foreign national, then the nationality of the attendee is also requested. Foreign nationals have additional required documentation to enter a federal building if the meeting is held in-person. Foreign nationals do not have to provide the same documentation if the meeting is scheduled in a virtual or hybrid format (and they are not attending in-person).

#### 11. Sensitive Questions

The requestor will not be asked to provide sensitive information.

#### 12. Burden Estimate (Total Hours & Wages)

The public reporting burden for this information collection is estimated to be 20 minutes. This burden estimate includes time for reading each screen, gathering required information, and completing and submitting the information.

Requestors are typically law firms or public relations companies requesting a meeting on behalf of their clients. CEOs also request meetings, as do individuals. The convenience of submitting requests through the online portal results in faster customer service and better satisfaction. The portal offers guidance and direction for requestors, enhancing the accuracy and completeness of their submissions. It provides information instantly to CMS, preventing multiple iterations through mail and email.

Number of respondents and frequency of response: CMS received 465 meeting requests in CY2025. For an additional eight years of data, see below. Note that requests are frequently higher in the years that new Administrations take office (2025; 2017)

<b>Year</b>	<b>Number of Meeting Requests for the Administrator</b>
2025	465
2024	113
2023	140
2022	152
2021	178
2020	173
2019	227
2018	264
2017	471

Burden hour and cost to respondents for the collection of information: There will be no cost to requestors other than the time required to request, complete, and submit the online form; however, we have provided a dollar cost equivalent of this hour burden. We estimate it should take approximately 20 minutes for a requestor to complete the required information. Twenty minutes multiplied by 465

requests in 2025 equals 9,300 minutes per year (155 hours annually).

Additionally, because we are largely making our current meeting request form electronic through the portal, we estimate that respondents currently spend about the same amount of time submitting their requests via the current mail / email submission options if using the current form. Therefore, we estimate that the burden cost estimate below for the online portal is NOT to be considered an additional or new cost burden. We believe the online portal minimizes errors and creates efficiencies that lower the burden in comparison to a manual request process (i.e., mail or email submission).

<b>Table 1: Estimation of the Annual Respondent Burden; Respondent Type</b>	<b>Number of Respondents, in 2025</b>	<b>Unit Cost (\$/hr)</b>	<b>Units (20 mins)</b>	<b>Total cost per 1 request</b>	<b>Total cost for requests annually, based on 465 total requests</b>
Private Citizen <sup>2</sup>	47	\$23.11	0.33	\$7.63	\$358.61
Administrative Assistant <sup>3</sup>	186	\$22.22	0.33	\$7.33	\$1,363.38
Public Relations/Consulting Firm <sup>4</sup>	139	\$64.79	0.33	\$21.44	\$2,980.16
Executive Level <sup>5</sup>	93	\$99.37	0.33	\$32.79	\$3,049.47
Totals	465				\$7,7751.62

### 13. Capital Costs

There are no capital costs associated with this information collection request.

### 14. Cost to the Federal Government

Cost: CMS expects the portal to cost \$45,000 for operations and maintenance per year once it is launched.

Savings: CMS expects savings to derive from the amount of staff time that is saved because of the efficiencies achieved through receiving the meeting requests online rather than staff retyping the requests into SWIFT daily.

- Average yearly salary cost of a government staff FTE to enter meeting requests into CMS's SWIFT system:

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<sup>2</sup> Median hourly wage of all occupations is \$23.11; US Bureau of Labor Statistic Website for Median Hourly Wage for All Occupations, [https://www.bls.gov/oes/2023/may/oes\\_nat.htm#00-0000](https://www.bls.gov/oes/2023/may/oes_nat.htm#00-0000)

<sup>3</sup> Median hourly wage for information and records clerk, \$22.22; US Bureau of Labor Statistic Website for Median Hourly Wage for Information and Records Clerk, <https://www.bls.gov/oes/2023/may/oes434199.htm#nat>

<sup>4</sup>Median hourly wage for Public Relations Managers, \$64.79; US Bureau of Labor Statistic Website for Public Relations Manager: <https://www.bls.gov/oes/2023/may/oes112032.htm>

<sup>5</sup> Median hourly wage for Chief Executives, \$99.37; US Bureau of Labor Statistics Website <https://www.bls.gov/oes/2023/may/oes111011.htm>



- Salary of a GS-14 step 1 in Washington, DC, in 2025 is \$142,488 year, or \$68.50 per hour.
- It takes a CMS GS-14, step 1, 30 minutes to process a new request (to read the incoming request (on paper or email), decide if it is correspondence or a meeting request if it is in a letter, open a new SWIFT case, enter the data manually, including gathering additional data if the incoming request is not complete).
- CMS received 465 requests in 2025.
- There were 247 business days in 2025.
- Therefore, CMS received an average of 1.88 requests per business day in 2025.
- At 30 minutes per case (1/2 an hour) X \$68.50 per hour X 465 cases = \$15,926.25.

CMS submits that the agency will be able to reduce the time entering meeting request data into SWIFT when CMS launches the CMS Meeting Request Portal.

#### 15. Program Changes

This is a new information collection request. The purpose of the portal is to provide an efficient mechanism for the public to request and the federal government to process external meetings. Subsequent to submitting the 60-day notice, we decided to add the organization's mailing address to the list of data elements. Similarly, we also updated the projected number of respondents from 427 to 465 based on updated data. These changes will not have an effect on the original burden estimate of 20 minutes per request; however, we adjusted the total annual burden from 142 hours to 155 hours.

#### 16. Publication and Tabulation Dates

Individual responses are not published.

#### 17. Expiration Date

CMS will include the OMB collection information, number, and burden on the public facing web portal when available.

#### 18. Certification Statement

There are no exceptions to the certification statement.