

SMART PRA package
Removed, Relocated, and New Provisions (as of 09/02/2025)

Exhibit 1: Supporting Statement

Original Section	Section Title	New Section	Regulatory Requirement	Reason Removed, Relocated, or New	Increased or Decreased Burden Hours?
–	–	Table of Contents	–	Updated to include a table of contents that is hyperlinked.	N/A
–	–	List of Tables	–	Updated to include a list of tables section that is hyperlinked.	N/A
A.	Background	N/A	Affordable Care Act Section 1311 (b)	Updated language to bring current.	N/A
B.	Justification	N/A	45 CFR § 155.1200, § 155.1210	N/A	N/A
12.	Burden Estimates (Hours & Wages)	N/A	45 CFR § 155.1200, § 155.1210	Updated burden table estimates. Updated hourly rates and Occupation Codes/Titles according to the most recent BLS Wage Estimate Table 2024.	N/A
14.	Cost to Federal Government	N/A	45 CFR § 155.1200, § 155.1210	Updated Cost to Federal Government table to reflect updated GS pay schedule effective 1/1/2024.	N/A
15.	Changes to Burden	N/A	45 CFR § 155.1200, § 155.1210	Updated total burden hours and estimates to account for increase in estimated respondents over the next three-year period (21 to 23 SBEs). Updated sections	Increase
15.1	Eligibility and Enrollment	N/A	45 CFR § 155.1200, § 155.1210	Updated language to reflect updates to the SMART tool.	N/A
15.2	Financial Programmatic Audit	N/A	45 CFR § 155.1200, § 155.1210	Updated language to reflect updates to the SMART tool.	N/A
15.3 Program Integrity	–	15.3 Self-Reporting: Financial and Programmatic Audit Opportunity for Comments	45 CFR § 155.1200, § 155.1210	Updated language to reflect updates to the SMART tool.	N/A

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Table 13	Summary SMART Requirements	N/A	N/A	Updated table to detail specific updates made to the SMART tool. Updates include: <ul style="list-style-type: none"> • Adding attestations • Revising attestation language • Adding fields for attestations of “No” or “Partial” • Changed element III from “Program Integrity” to “Self-Reporting: Financial and Programmatic Audit Opportunity for Comments 	Increase

Exhibit 2: SMART Tool

Original Section	Section Title	New Section	Regulatory Requirement	Reason Removed, Relocated, or New	Increased or Decreased Burden Hours?
–	Introduction	–	45 CFR § 155.1200, 45 CFR § 155.1210	Updated language to Introduction	N/A
–	Table of Contents	–	45 CFR § 155.1200, 45 CFR § 155.1210	Updated to include PRA Disclosure Statement	N/A

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I.	Eligibility and Enrollment	N/A	45 CFR § 155.1200, 45 CFR § 155.1210	<ul style="list-style-type: none"> • Add “Verification of Identity” attestation. • Add “Eligibility Application” Attestation. • Add “Inconsistency Verification” sub-attestation. • Add “Administration of APTC” sub-attestation and the corresponding requirement to submit the State Exchange APTC proration methodology. • Add “Standards for Web-Brokers and Direct Enrollment (DE) Entities” attestation. • Add “Improper Payment Participation” attestation. • Add “Incarceration” sub-attestation to elaborate collect any alternative data sources used by State Exchanges for this verification. • Add “Self-Reporting: Eligibility and Enrollment Opportunity for Comments” section. • Revise the “Social Security Number,” “Citizenship,” “Lawful Presence,” “Household Income and Size,” “Employer Sponsored Coverage,” “Periodic Data Matching,” and “Special Enrollment Period” attestations to collect additional information on SBE verification processes and align with regulatory changes, as applicable. • Revise State Exchange Annual Eligibility Redeterminations Template to align with updated federal regulations. • Add fields, as applicable, for State Exchanges to provide additional information or clarification for attestations of “No” or “Partial” or “not Applicable” to help Federal reviewers to better understand areas of non-compliance. • Updated Table O. order. 	Increase

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II.	Financial and Programmatic Audit	N/A	45 CFR § 155.1200, 45 CFR § 155.1210	<ul style="list-style-type: none"> Revise language in “Financial Independent External Audit” to clarify to State Exchanges how to submit their external financial audit, ACFR, and internal controls report. Update language from Comprehensive Annual Financial Report (CAFR) to Annual Comprehensive Financial Report (ACFR). Revise order of attestations to improve flow and user experience. Add optional field for State Exchanges to provide additional information or clarification regarding their responses in this section of the SMART. (This was previously included in the Program Integrity section and is now separate and included in this section for improved flow and user experience). Add fields, as applicable, for State Exchanges to provide additional information or clarification for attestations of “No” or “Partial” to help Federal reviewers to better understand areas of non-compliance. 	N/A
III.	III. Program Integrity	N/A	45 CFR § 155.1200, 45 CFR § 155.1210	Add fields, as applicable, for State Exchanges to provide additional information or clarification for attestations of “No” or “Partial” to help federal reviewers to better understand areas of non-compliance.	N/A