| | Centers for Medicare & Medicaid Services<br>Office of Financial Management |
|---|---|

# [SBE Name] Improper Payment Pre-Testing and Assessment (IPPTA) Plan Template

**Draft**

**Date**

# Table of Contents

# 1.   Introduction

## 1.1   Overview of the Improper Payment Pre-Testing and Assessment Initiative

The Payment Integrity Information Act of 2019 (PIIA) requires federal executive agencies to identify all programs and activities with outlays exceeding a statutory threshold dollar amount that may be susceptible to significant improper payments.[1] The Department of Health and Human Services (HHS) determined that advance payments of the premium tax credit (APTC) are susceptible to significant improper payments and are subject to additional oversight. HHS, as used herein, refers to the department, Centers for Medicare & Medicaid Services (CMS), and its contractors.

CMS established the Exchange Improper Payment Measurement (EIPM) program to measure improper payments for Federally-facilitated Exchanges (FFEs) and State-based Exchanges on the Federal platform (SBE-FPs). In 2022, the annual Agency Financial Report (AFR) began to report improper payments of APTC made by FFEs and SBE-FPs as part of the EIPM program. Improper payments of APTC made by State-based Exchanges (SBEs), which are exchanges that operate their own eligibility and enrollment systems, will not be measured and reported until a measurement program is established regarding such payments. CMS is in the planning phase of establishing a State-based Exchange Improper Payment Measurement (SEIPM) program.[2] The SEIPM program will serve as CMS's formal improper payment measurement program for SBEs. In order to assist in the development of the SEIPM program, CMS established the Improper Payment Pre-Testing and Assessment (IPPTA). Additionally, IPPTA will provide a mechanism for CMS and SBEs to share information that will aid in developing an efficient measurement process.[3]

## 1.2   Background

In 2019, CMS developed the voluntary state engagement initiative to provide SBEs with an opportunity to prepare for planned measurement of improper payments of APTC. CMS provided three options to SBEs—program analysis, program design, and piloting—designed to accommodate the SBEs' schedules and availability to participate in the initiative. Several SBEs participated in voluntary engagement. Upon further assessment, CMS determined that participation from all SBEs is required to test processes and procedures related to APTC. CMS established IPPTA to replace the current voluntary state engagement initiative.[4] The final rule

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[1] 31 U.S.C. § 3352(a)(1)(B)

[2] 87 Fed. Reg. at 27280 (May 6, 2022)

[3] 88 Fed. Reg. at 25840 (Apr. 27, 2023)

[4] 88 Fed. Reg. 25740 (Apr. 27, 2023)  The IPPTA requirements can be found in Part 155, subpart P. The IPPTA requirements became effective on June 18, 2023.

that established IPPTA was published in the Federal Register on April 27, 2023, at 88 Fed. Reg. 25740.

## 1.3    Purpose of the IPPTA Plan

This document provides an engagement framework that describes the activities and target timelines of IPPTA engagement. This document is intended to be used as a central point of communication between [SBE Name], CMS, and its contractors. Hereafter, use of CMS will refer to CMS and its contractors. This document reflects the terms of the engagement, and includes the following: points of contact, planned activities, methods of communication and necessary data use agreements to ensure successful progression towards the defined outcomes.

Section 8 of this document includes an activity planner that can be used to track the status of activities and identify next steps.

This document may be updated per coordination between CMS and [SBE Name].

# 2.    Previous Engagements with [SBE Name]

[*Instructions: If the SBE participated in voluntary state engagement before IPPTA began (2023 for Group A or 2024 for Group B), include the activities that the SBE previously participated in and completed. Consult the SBE's Program Analysis Report (PAR) and SBE's IPPTA Checklist (which should be updated based on the PAR) as a reference. If the SBE did not have previous engagements, this section can be removed and all IPPTA activities listed below are applicable.*]

*Example language:*

CMS and [SBE Name] collaborated during the voluntary state engagement period prior to the beginning of IPPTA. CMS held an introductory kickoff call with members of [SBE Name] on [Month, DD, YYYY], in which background information was provided pertaining to the SEIPM program, as well as an outline of the following engagement options – Program Analysis, Program Design, and Pilot. Following the virtual site visit on [Month, DD, YYYY], [SBE Name] chose the [Enter the engagement option] engagement option, which formally kicked off on [Month, DD, YYYY]. The engagement concluded on [Month, DD, YYYY] with the [partial completion/completion] of the [enter engagement option (Site Visit/Program Analysis/Program Design/Pilot)] phase.

# 3.    Overview of IPPTA Engagement

The engagement with [SBE Name] for IPPTA occurs over the course of two years from January [2024 or 2025] through December [2025 or 2026].

CMS developed IPPTA, in part, to test CMS's processes and procedures for improper payment measurement of APTC and prepare SBEs for planned measurement. Planned improper payment measurement will assess SBEs processes for APTC determination. CMS will collect and review

data and information from each SBE during IPPTA. This will help CMS determine the effectiveness of proposed technology, tools, and data collection methods to inform future program development.

IPPTA high-level processes and procedures include:

- Orientation and Planning
- Submission of Data Documentation
- Completion and Submission of IPPTA Data Request Form (DRF)
- Discussion of Review Observations
- SBE Closeout and IPPTA Report

*[Instructions: Keep one of the below options depending on whether the SBE participated in voluntary state engagement.]*

As applicable, activities that [SBE Name] successfully completed while participating in a voluntary state engagement will not be duplicated as part of IPPTA. CMS will work with [SBE Name] during the orientation and planning processes to review the IPPTA checklist and to confirm [SBE Name]'s completed activities.

*[OR]*

Since [SBE Name] did not participate in in voluntary state engagements will not have performed activities that satisfy IPPTA requirements, and therefore, must complete all IPPTA processes and procedures.

## 3.1    IPPTA Requirements Met Through Voluntary State Engagement

*[Instructions: This section should specify the IPPTA requirements that were met through prior voluntary state engagement. The list of activities from the IPPTA Checklist is below. Remove bullets that were not given credit from voluntary state engagement. In the cases of partial completion, make note of the partial completion here but list those activities in Section 3.2 too such that all outstanding IPPTA items are in one space for convenience and clarity. If the SBE did not participate in voluntary state engagement, this section can be removed.]*

- The appropriate information-sharing agreement(s) between SBE and CMS are in place to share data and data documentation, as described in Section 5
  - Note: If existing agreements in place are not acceptable for IPPTA, SBEs will be required to complete new agreements.
- SBE set-up and tested connectivity to the designated CMS systems for data and data documentation transfer
- SBE submitted data documentation that addresses the SBE's:
  - Business rules and related calculations
  - Entity Relationship Diagram
  - Data Dictionary

- o Operating Procedures
- o State Policies
- o System Technology
- SBE responded to CMS questions and requests for clarification related to data documentation
  - o *Note: If SBEs have updated to their business rules and policies since voluntary state engagement, SBEs will still be required to update this for the Plan Year that is under review.*
- SBE reviewed and acknowledged the SBE-specific Review Modules Document (RMD) that CMS created based on the SBE's specific business rules and policies
- SBE completed the mapping of SBE data elements from its source data repositories to the DRF information elements
- SBE completed the pre-sampling tab of the DRF
- SBE identified applications in the pre-sampling tab that collectively meet the scenarios specified by CMS
- SBE submitted the application data associated with no fewer than 10 tax household identification numbers and the associated policy identification numbers including all submitted application versions and any associated consumer submitted documentation
- SBE engaged in follow-up discussions with CMS on additional information, clarifications, and corrections to ensure that the SBE's submitted data and consumer submitted documents are sufficient to enable CMS to fully review the sampled unit data submitted
- SBE acknowledged CMS's review observations including the underlying reasons why they were generated and collaborated with CMS re-evaluating the observations, if warranted

## 3.2    Remaining IPPTA Activities

*[Instructions: This section should specify the IPPTA activities that were not fully met through voluntary state engagement, such that it is clear to the SBE what remains to be completed. If the SBE did not participate in a voluntary state engagement, note it in this section. All activities listed are relevant for these SBEs.*

*This list of activities should be updated based on changes to activities in the IPPTA SOP, IPPTA Implementation Plan, IPPTA sub-regulatory guidance, and IPPTA Checklist.]*

### 3.2.1    Orientation and Planning

Orientation and Planning activities are proposed to be completed from the beginning of engagement in January through the end of April [2024 or 2025, based on Group]. Activities for [SBE Name] to complete include:

- Participate in an all-states kickoff call to receive an overview of IPPTA and SEIPM, if necessary

- Participate in an introductory session to introduce points of contact, answer any questions, and verify SBE information
- Participate in orientations for:
    - IPPTA Review Architecture
    - IPPTA DRF and Information Elements
    - Sampling Methodologies for IPPTA and SEIPM
- Set-up and test connectivity to the designated CMS systems for data and data documentation transfer
- Collaborate with CMS to review its IPPTA Checklist and which activities have been satisfied
- Collaborate with CMS to refine its IPPTA Plan and understands what activities are to be completed during IPPTA
- Complete the appropriate information-sharing agreement(s) between SBE and CMS to share data and data documentation, as described in Section 5

### 3.2.2    Submission of Data Documentation

Submission of Data Documentation activities are proposed to be completed from March through July [2024 or 2025, based on Group]. Activities for [SBE Name] to complete include:

- Review the IPPTA Data Documentation Examples and Submission Instructions Job Aid and reach out with any clarification questions
- Submit data documentation that addresses the SBE's:
    - Business rules and related calculations
    - Entity Relationship Diagram
    - Data Dictionary
    - Operating Procedures
    - State Policies
    - System Technology
- Respond to CMS questions and requests for clarification related to data documentation
- Review and acknowledge the SBE-specific Review Modules Document (RMD) that CMS created based on the SBE's specific business rules and policies
- Optionally, provide feedback on their experience with the data documentation submission and RMD review process including the level of effort SBE staff expended to perform required activities and recommendations for streamlining and improvement in a future SEIPM program

### 3.2.3    Completion and Submission of IPPTA DRF

Completion and Submission of IPPTA DRF activities are proposed to be completed from March through July [2024 or 2025, based on Group]. Activities for [SBE Name] to complete include:

- Review the IPPTA Data Request Form Job Aid and reaches out with any clarification questions
- Complete the mapping of SBE data elements from its source data repositories to the IPPTA DRF information elements
- Complete the pre-sampling tab of the IPPTA DRF
- Optionally, provide feedback on the process of populating the pre-sampling tab including the level of effort expended and any recommendations on streamlining or improving this process
- Identify applications in the pre-sampling tab that collectively meet the scenarios specified by CMS
- Submit the application data associated with no fewer than 10 tax household identification numbers and the associated policy identification numbers including all submitted application versions and any associated consumer submitted documentation

### 3.2.4    Discussion of Review Observations

Discussion of Review Observations activities are proposed to be completed from August [2024 or 2025, based on Group] through April [2025 or 2026, based on Group]. Activities for [SBE Name] to complete include:

- Engage in follow-up discussions with CMS on additional information, clarifications, and corrections to ensure that the SBE's submitted data and consumer submitted documents are sufficient to enable CMS to test all IPPTA processes and procedures
- Acknowledge CMS's review observations including the underlying reasons why they were generated and collaborated with CMS re-evaluating the observations, if warranted
- Resubmit the IPPTA DRF, if requested, due to issues such as data quality.

### 3.2.5    SBE Closeout and IPPTA Report

SBE Closeout and IPPTA Report activities are proposed to be completed from May through November [2025 or 2026, based on Group]. Activities for [SBE Name] to complete include:

- Provide feedback on its engagement in IPPTA for consideration in planning SEIPM
- Discuss with CMS the lessons learned and recommendations for SEIPM that CMS identifies from the SBE's engagement in a Closeout session
- Receive and review its IPPTA Report from CMS

# 4.  Points of Contact

### Table 1. SBE Contact Information

| Name | Role | Email | Phone |
|------|------|-------|-------|
|      |      |       |       |
|      |      |       |       |
|      |      |       |       |
|      |      |       |       |
|      |      |       |       |

### Table 2. CMS Contact Information

| Name | Role | Email | Phone |
|------|------|-------|-------|
|      |      |       |       |
|      |      |       |       |
|      |      |       |       |
|      |      |       |       |
|      |      |       |       |

### Table 3. [Contractor(s)] Contact Information

| Name | Role | Email | Phone |
|------|------|-------|-------|
|      |      |       |       |
|      |      |       |       |
|      |      |       |       |
|      |      |       |       |
|      |      |       |       |

# 5.   Information Exchange Agreements (IEA)

SBEs will be required to share certain data with CMS including application-level consumer information, SBE verification events, and consumer-submitted verification documents. The existing Information Exchange Agreement (IEA) between CMS and SBEs for "The Disclosure of Health Insurance Affordability Programs Information Under the Patient Protection and Affordable Care Act" (CMS Information Exchange Agreement No. 2019-03) may be considered sufficient by CMS to cover IPPTA data exchanges. Detailed discussions will be held with [SBE Name] to establish the specific data request and transfer mechanisms for IPPTA activities.

# 6.   Documentation Requests

To prepare for IPPTA, CMS will explore relevant information available from both public sources and from within CMS to collect as much information about [SBE Name] as possible. Additionally, CMS will request documents to better understand the [SBE Name]'s policies and procedures. Document requests could include items such as data dictionaries, entity relationship diagrams, other documentation detailing business rules, consumer-submitted documentation, and pre-sampling data. The IPPTA Data Documentation Examples and Submission Instructions Job-Aid provides further detail on the requested documentation.

*[Instructions: Insert directions to SBE detailing where and how documentation types should be uploaded. Documentation containing protected health information (PHI) or personally identifiable information (PII) must follow security measures, so it may be uploaded and stored differently than other documents, such as those focusing on business rules. Also, restate any timeframes agreed upon with the SBE for submission timing.]*

# 7.   Communications and Management

*[Instructions: Insert any updated decisions regarding which platforms will be used (e.g., zONE and/or Box) and in what situations to use each (e.g., transmitting PII/PHI). Insert any updated decisions regarding the cadence of meetings with the SBE and CMS.]*

Over the course of IPPTA, CMS and [SBE Name] will need to coordinate meetings, clarify information, manage data and documentation requests, and verify findings. To ensure steady progress over the course of the engagement, CMS proposes the following:

- Pre-scheduled regular meetings
- Ad Hoc submission of question sets
- Ad Hoc reach back for any additional clarification

To effectively manage the engagement, CMS proposes using the activity planner, found in Section 8 of this document, to track progress towards the defined engagement activities.

## 7.1 Scheduled Meetings

*[Instructions: Update this list with any pre-determined meetings that should be held with the SBE and remove those that are already fulfilled from prior voluntary engagement, if applicable. Based on meeting cadence, add any other meetings. Propose dates for the meetings below to discuss with the SBE and CMS while reviewing the IPPTA Plan. Consider the proposed and/or confirmed dates with other SBEs' schedules for workload management. Consult the IPPTA Implementation Plan for the proposed timeframe of activities within each Workstream.]*

Meetings include:

- All-states call (if necessary)
- Introductory meeting
- IPPTA Plan Review
- Orientation on Review Architecture
- Orientation on IPPTA DRF and Information Elements
- Orientation on Sampling Methodologies
- Presentation of Review Observations
- SBE Closeout session

# 8.  Activity Planner

*[Instructions: Remove activities that were completed during voluntary state engagement and are not necessary for the outstanding activities to be completed during IPPTA. Consult the IPPTA Implementation Plan for recommended timeframes.]*

The Activity Planner is organized by IPPTA's five Workstreams. It includes only the activities that are to be completed during the IPPTA period. For activities completed during voluntary state engagement, visit Section 3.1. *[Remove the last sentence if the SBE did not participate in voluntary state engagement.]*

## 8.1  Workstream 1: Preparing SBEs for IPPTA

**Table 4. Workstream 1 – Preparing SBEs for IPPTA**

| Activity: | Requested Timeframe: | Planned Completion Date: | Notes (e.g., next steps, observations, process exceptions): |
|---|---|---|---|
| SBE attends all-states kickoff call for an overview of IPPTA and SEIPM. | [Timeframe during which the activity should be done] Format– MM:DD:YY - MM:DD:YY | [Planned upon completion date between SBE and CMS] | |
| SBE attends an introductory session with CMS to verify POCs and background information pertaining to the SBE's operations and policies. | | | |
| SBE attends an introduction to the IPPTA Review Architecture. | | | |
| SBE establishes access to CMS document-sharing tools (such as zONE or Box) and MIDAS. | | | |

Centers for Medicare & Medicaid Services                                                    Activity Planner

| Activity: | Requested Timeframe: | Planned Completion Date: | Notes (e.g., next steps, observations, process exceptions): |
|---|---|---|---|
| SBE reviews and updates the proposed IPPTA Plan with CMS. | | | |
| SBE discusses data use agreements and Information Exchange Agreement for IPPTA with CMS. | | | |
| SBE reviews IPPTA Data Documentation Examples and Submission Instructions Job-Aid. | | | |
| SBE submits SBE system documentation. | | | |
| SBE reviews & responds to the Max APTC Calculation Questions | | | |
| SBE participates in Interview Sessions with CMS to note alignment of the SBE's enrollment and eligibility system to the IPPTA baseline review criteria. This can include responding to questions asked in the follow-up questions document. | | | |
| SBE provides feedback on level of effort (LOE) and experience with data documentation submission to improve the SEIPM program. | | | |
| CMS reviews and updates SBE-Specific RMD (for any modified criteria). | | | |
| SBE reviews and concurs/non-concurs with SBE-Specific RMD. | | | |

Centers for Medicare & Medicaid Services                                                                                Activity Planner

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## 8.2    Workstream 2: Sampling

**Table 5. Workstream 2 – Sampling**

| Activity: | Requested Timeframe: | Planned Completion Date: | Notes (e.g., next steps, observations, process exceptions): |
|---|---|---|---|
| SBE attends the IPPTA DRF and Information Elements orientation. | [Timeframe during which the activity should be done] Format– MM:DD:YY - MM:DD:YY | [Planned upon completion date between SBE and CMS] | |
| SBE attends the Sampling Methodologies orientation. | | | |
| SBE reviews the IPPTA Data Request Form Job-Aid and IPPTA DRF. Request clarifications, if needed. | | | |
| SBE reviews DRF Pre-Sampling Tab and instructions for Policy IDs to be mapped to Tax Households and associated inconsistency counts/presence. | | | |
| SBE completes data mapping to cross-reference SBE data elements to the IPPTA DRF Information Elements. This will likely take several iterations to ensure accuracy. | | | |
| SBE populates the "Pre-sampling" tab within the DRF. SBE maps Policy IDs to Tax Households and provides inconsistency counts/ presence. | | | |

Centers for Medicare & Medicaid Services                                                                    Activity Planner

| Activity: | Requested Timeframe: | Planned Completion Date: | Notes (e.g., next steps, observations, process exceptions): |
|---|---|---|---|
| SBE provides feedback on LOE and experience with pre-sampling. | | | |
| SBE reviews the draft IPPTA DRF and instructions for identifying Consumer Submitted Documents. | | | |
| SBE identifies applications from the Pre-sampling tab that meet scenarios. The Scenario-mapping spreadsheet can be used to map selected records to scenarios. | | | |
| SBE extracts data for identified applications and populate the IPPTA DRF. | | | |
| SBE submits populated IPPTA DRF (Sampled Unit Data). | | | |
| SBE submits any consumer verification documents associated with the list of applications in the IPPTA DRF to CMS. | | | |
| SBE provides feedback on LOE needed and experience of populating the IPPTA DRF tabs to improve SEIPM. | | | |
| SBE resubmits the IPPTA DRF, if requested, due to issues such as data quality. | | | |

## 8.3    Workstream 3: Conducting Reviews

**Table 6. Workstream 3 – Conducting Reviews**

| Activity: | Requested Timeframe: | Planned Completion Date: | Notes (e.g., next steps, observations, process exceptions): |
|---|---|---|---|
| CMS validates that the IPPTA DRF is ready for review execution or if a resubmission is needed. | [Timeframe during which the activity should be done] Format– MM:DD:YY - MM:DD:YY | [Planned upon completion date between SBE and CMS] | |
| CMS executes reviews for review units applicable to the SBE and records results. Reviews process can be iterative. | | | |
| CMS classifies review unit results based on whether errors were found, and type of error found, if present. | | | |

## 8.4    Workstream 4: Observations Collaboration

Table 7. Workstream 4 – Observations Collaboration

| Activity: | Requested Timeframe: | Planned Completion Date: | Notes (e.g., next steps, observations, process exceptions): |
|---|---|---|---|
| CMS aggregates review output data and summarizes sampled unit reviews to present to the SBE. | [Timeframe during which the activity should be done] Format– MM:DD:YY - MM:DD:YY | [Planned upon completion date between SBE and CMS] | |
| SBE provides feedback to CMS during presentation of observations | | | |

Centers for Medicare & Medicaid Services                                          Activity Planner

| Activity: | Requested Timeframe: | Planned Completion Date: | Notes (e.g., next steps, observations, process exceptions): |
|---|---|---|---|
| on where there may be incorrect errors or where there is additional context. | | | |
| If applicable, SBE provides updated DRF Sampled Unit Data for CMS to iterate reviews. | | | |
| SBE continues to meet with CMS to discuss updated observations through the last review iteration, if multiple reviews are executed. | | | |

## 8.5     Workstream 5: SBE Closeout

**Table 8. Workstream 5 – SBE Closeout**

| Activity: | Requested Timeframe: | Planned Completion Date: | Notes (e.g., next steps, observations, process exceptions): |
|---|---|---|---|
| CMS finalizes IPPTA Plan and IPPTA Checklist based on completed activities. | [Timeframe during which the activity should be done] Format– MM:DD:YY - MM:DD:YY | [Planned upon completion date between SBE and CMS] | |
| SBE provides any additional feedback on IPPTA to inform SEIPM recommendations. | | | |
| SBE attends Closeout session with CMS to discuss lessons learned from IPPTA and SBE readiness for SEIPM. | | | |

| Activity: | Requested Timeframe: | Planned Completion Date: | Notes (e.g., next steps, observations, process exceptions): |
|---|---|---|---|
| CMS provides IPPTA Report to SBE. | | | |

# 9. IPPTA Materials

### Table 9. IPPTA Materials

| Document Name | Description | Location |
|---|---|---|
| **IPPTA Data Request Form (DRF)** | The IPPTA DRF is the primary tool CMS uses to collect exchange application data from SBEs to perform the IPPTA review processes. The IPPTA DRF is an MS Excel workbook with 15 tabs divided by topic area to enable SBEs to conduct a structured data extract. The last tab of the workbook is the "Data Dictionary," which provides the definitions, format, length, and example for each information element. The IPPTA DRF tabs specify the data CMS needs to conduct all review units in a Review Modules Document (RMD) specific to the SBE. The IPPTA DRF is required by the IPPTA regulation at 45 CFR § 155.1510(a)(2). OMB approved the IPPTA DRF for the collection of data from SBEs for IPPTA under OMB control number 0938-1439. A copy of the IPPTA DRF template is in Appendix D of the IPPTA Sub-Regulatory Guidance. | [Insert links on where the SBE can locate each of these documents] |
| **Interview Worksheet** | An Excel document used to gather SBE-specific requirements for the key verification events used to determine APTC calculations. | |
| **Review Modules Document (RMD)** | A document that outlines all the tests used to detect improper payments. These tests are partitioned into review units. This document lists each review unit's objective, criteria, required information elements, and regulatory background. | |

| Document Name | Description | Location |
|---|---|---|
| **IPPTA Plan** | The IPPTA plan is created from a template that CMS will tailor to each SBE. The IPPTA plan enumerates the procedures, sequence, and schedule that CMS and each SBE will follow to accomplish all the IPPTA processes and procedures. The IPPTA plan also includes the IPPTA checklist, which CMS will use to review and document a SBE's completion of IPPTA requirements. A copy of the IPPTA plan template is in Appendix B.2 of the IPPTA Sub-Regulatory Guidance. | |
| **IPPTA Checklist** | The IPPTA checklist is created from a template that CMS will tailor to each SBE. It is divided into five categories:<br><br>1. Participation in IPPTA Orientation and Planning Processes<br>2. SBE-specific RMD Development and Acknowledgment<br>3. Mapping SBE Data to IPPTA DRF<br>4. Submission of Pre-sampling and Sampled Unit Data<br>5. Discussion of Review Observations<br><br>Descriptions of each category and the corresponding measurable objectives are in the IPPTA checklist template in Appendix B.3 of the IPPTA Sub-Regulatory Guidance. | |
| **IPPTA Notification** | A Word template to issue notifications to SBEs concerning information related to IPPTA processes and procedures. The template will be included in Appendix B.1 of the IPPTA Sub-Regulatory Guidance. | |
| **IPPTA Report** | The IPPTA report is created from a template that CMS will tailor to each SBE. The SBE-specific IPPTA report summarizes all the accomplishments of the SBE through its participation in IPPTA and will include:<br><br>• Final IPPTA plan<br>• Final IPPTA checklist with CMS's assessment of the SBE's completed activities | |

| Document Name | Description | Location |
|---|---|---|
| | •   List of tasks, if any, that the SBE was not able to perform during the IPPTA period<br>•   Observations and recommendations that result from processing and reviewing the SBE's data to assist the SBE in its preparations for the planned measurement program<br>•   Summary of the SBE's feedback and recommendations on how to improve the tools and processes for the planned measurement program<br><br>A copy of the IPPTA report template is in Appendix B.4 of the IPPTA Sub-Regulatory Guidance. | |
| **IPPTA Data Documentation Examples and Submission Instructions Job-Aid** | Defines and provides examples of each type of data documentation required, including a general description of how CMS will use the data documentation in the IPPTA review process, as well as submission instructions (e.g., SFTP). | |
| **IPPTA Data Request Form (DRF) Job-Aid** | 14 modules (narrated PPT, transcript of narration, and Mp4 with closed captions for each module). Intended to assist SBEs with completing the IPPTA DRF. Provides an overview of the IPPTA DRF, how to create proxy identifiers, and instructions on how to complete each tab of the IPPTA DRF. Includes context for each tab, tips to avoid common errors as well as directions for what to do if submitter cannot complete a field (e.g., SBE's business rules do not require collection). | |
| **Pre-Submission Checklist (DRF)** | A short (one-page) list of validation activities and QA checks that SBEs should perform prior to submitting the DRF to catch potential errors or omissions and reduce the number of DRF resubmission iterations between CMS and the SBE. | |

# 10. Signature Page

*[Instructions: Determine a mechanism to document all parties agreement on the IPPTA Plan. Examples could include written approval via email or capturing signatures.]*

# Appendix A.  IPPTA Checklist

[*Instructions: Insert the SBE-specific IPPTA Checklist here.*]