

# Annual Rule Risk Impact

Leah Hole-Marshall, General Counsel and Chief Strategist

Jasmine Hanson, Compliance Officer

# Notice of Benefit & Payment Parameters (NBPP) – Audit and compliance Highlights

1. Implements SEIPM early and expand improper payment measurement and audit sampling for SBEs
  - Increase workload; responsiveness concerns; false error rates
2. Expands HHS oversight of issuers
  - Increase workload; reduced SBE autonomy
3. Changes to align to HR 1 – increase eligibility checks; reduce eligibility
  - Increases customer appeals and retroactive corrections
  - Increases potential data errors
  - Increases compliance risk due to capacity challenge

# State Exchange Improper Payment Measurement (SEIPM)

## What CMS Is Proposing

- Proposed NBPP formally implements the SEIPM program for State Based Exchanges.
- Transitions from IPPTA into an ongoing improper payment measurement framework.
- Aligns SBE requirements with the Payment Integrity Information Act of 2019.

## Operational Impacts

- Expanded documentation and data validation requirements to support APTC improper payment measurement.
- Increased cross functional coordination across eligibility, enrollment, data, and reporting teams.
- Improper payment measurement becomes a standing annual compliance activity.

## Compliance & Risk Considerations

- Greater emphasis on eligibility accuracy, consistency, and traceable documentation.
- Findings are expected to focus on process maturity and systemic accuracy, not isolated errors.
- Sustained federal oversight increases expectations for preventive controls.

## Readiness

- Actively participating in IPPTA, CMS's preparatory program for SEIPM.
- Current work supports data quality improvements, documentation alignment, and audit readiness.
- SEIPM builds on existing compliance efforts rather than introducing a new program.



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