

**Gag Clause Prohibition Compliance Attestation  
(GCPCA)  
User Manual**



**Center for Consumer Information & Insurance Oversight  
(CCIIO)**

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## 1 - Introduction

This User Manual explains how to use the Gag Clause Prohibition Compliance Attestation (GCPCA) webform. Internal Revenue Code (Code) section 9824, Employee Retirement Income Security Act (ERISA) section 724, and Public Health Service (PHS) Act section 2799A-9, as added by the Consolidated Appropriations Act, 2021 (CAA), prohibit plans and issuers from entering into an agreement with a health care provider, network or association of providers, third-party administrator (TPA), or other service provider offering access to a network of providers, that would directly or indirectly restrict the plan or issuer from:

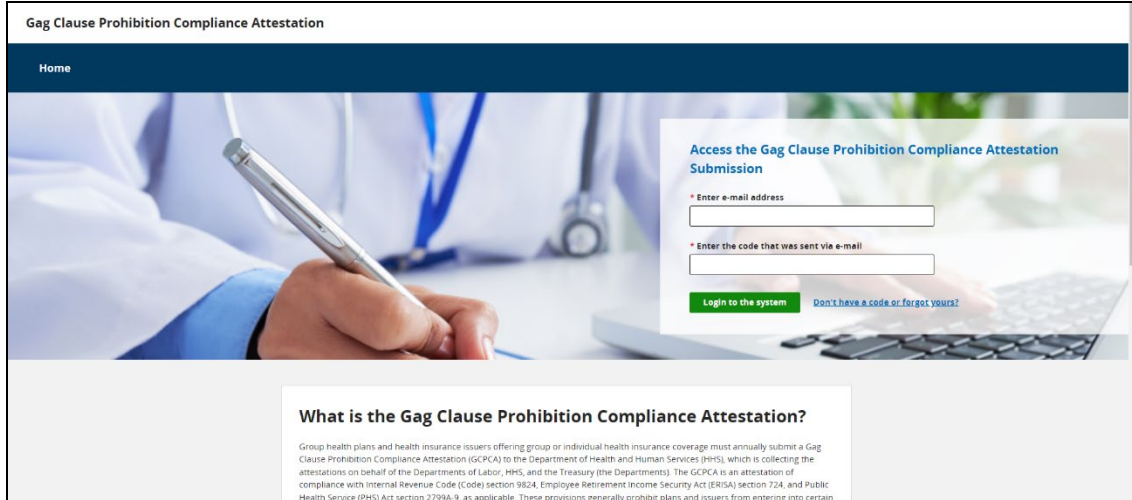
1. Providing provider-specific cost or quality of care information or data to referring providers, the plan sponsor, participants, beneficiaries, or enrollees, or individuals eligible to become participants, beneficiaries, or enrollees of the plan or coverage;
2. Electronically accessing de-identified claims and encounter data for each participant, beneficiary, or enrollee, upon request and consistent with applicable privacy regulations; and
3. Sharing such information, consistent with applicable privacy regulations.

Plans and issuers must annually submit to the Departments of Labor (DOL), Health and Human Services (HHS), and the Treasury (collectively, the Departments) an attestation of compliance with these requirements and should use the GCPCA Webform to do so.

## 2 - Accessing the Gag Clause Prohibition Compliance Attestation

- Access the GCPCA Homepage via the following link: [Gag Clause Prohibition Compliance Attestation submission](#) (Figure 1).
- From the GCPCA Homepage users will be able to login and access the Dashboard where they will be able to view, edit, and/or create their GCPCA.
- Users will be able to either log in with an existing access code that was previously emailed to them or request a new access code. Access codes are valid for 14 days, at which time they expire, and a new code must be obtained to use the GCPCA Webform.

**Figure 1 - Gag Clause Prohibition Compliance Attestation Landing Page**



### 3 - Get My Access Code

To request an access code for the first time or to request a new one if the previous code expired, or if you have forgotten your code, follow the below steps.

- Select “Don’t have a code or forgot yours?” (Figure 2).

**Figure 2 - Access the Gag Clause Prohibition Compliance Attestation Submission**





- Enter your e-mail address into the “Enter e-mail address” field (Figure 3).  
*\*Note: Enter a valid e-mail address, using the following format:  
e-mail@domain.extension.*
- Select “Get my access code” (Figure 3).

**Figure 3 - Get My Access Code**

**Enter your e-mail address to access the Gag Clause Prohibition Compliance Attestation Submission** [Close](#)

Once we receive your e-mail address, an access code will be generated and e-mailed to you. This e-mail will be from [submissions@cms.hhs.gov](mailto:submissions@cms.hhs.gov). Follow the instructions in the e-mail.

**\* Enter e-mail address**

**Get my access code** [Cancel](#)

- After completing a successful access code request, a message is displayed on the GCPCA landing page that lets the user know that the code should be received within 10 minutes (Figure 4).

**Figure 4 - Successful Access Code Request Message**

The code will be sent to your e-mail address within 10 minutes. If you do not receive a code within 10 minutes, you may either return to the homepage and request another code or contact the CMS Marketplace help desk support team at [CMS\\_FEPS@cms.hhs.gov](mailto:CMS_FEPS@cms.hhs.gov) or 1-855-267-1515.

**Access the Gag Clause Prohibition Compliance Attestation Submission**

**\* Enter e-mail address**

**\* Enter the code that was sent via e-mail**

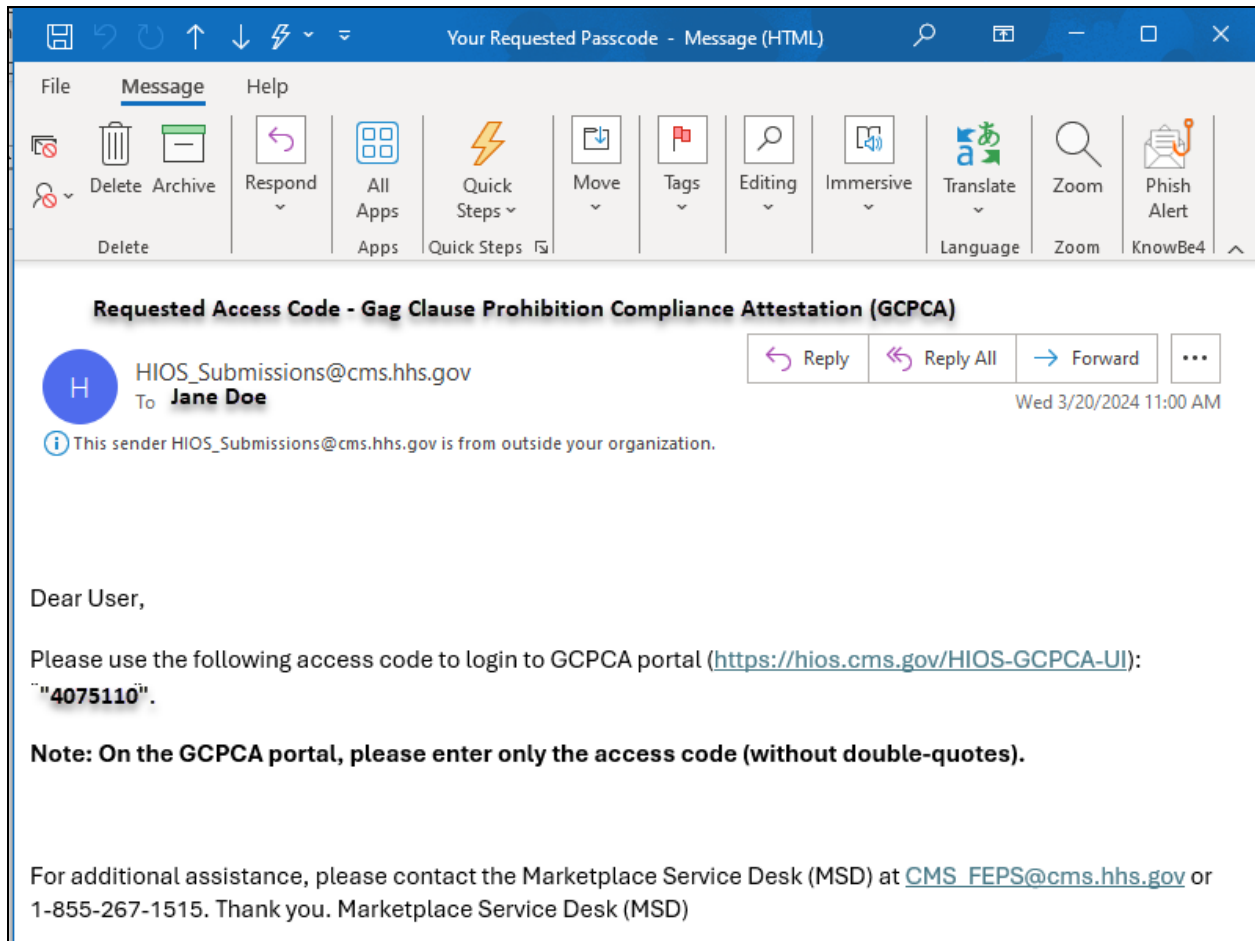
**Login to the system** [Don't have a code or forgot yours?](#)

- Access codes are generally delivered within 10 minutes to your e-mail address (Figure 5).

*\*Note: Check your spam folder if you do not receive an e-mail with the access code within 10 minutes of requesting it. Wait at least 10 minutes before requesting another access code or e-mailing the help desk if the initial request fails.*

- Once you receive an e-mail with the access code, it is valid for 14 calendar days.
- Your access code cannot be used by a different Submitter or Attester.

**Figure 5 - Requested Access Code E-mail**



#### 4 - Login to the “Gag Clause Prohibition Compliance Attestation Submission” Webform

- Enter your e-mail address into the “Enter e-mail address” field (Figure 6).
- Enter your access code into the “Enter the code that was sent via e-mail” field (Figure 6).
- Select “Login to the system” button (Figure 6).

**Figure 6 - Access Code and E-mail Address**

**Access the Gag Clause Prohibition Compliance Attestation Submission**

\* Enter e-mail address

\* Enter the code that was sent via e-mail

**Login to the system** [Don't have a code or forgot yours?](#)

Once logged in, you will be directed to the GCPCA Dashboard.

## 5 - GCPCA Dashboard

The GCPCA dashboard (Figure 7) includes a “Submissions” table that allows users to view, edit, or delete all “In Progress” and “Complete” submissions.

Helpful materials, such as the GCPCA Webform Instructions, this User Manual, and the GCPCA Responsible Entity Excel template, that assist with understanding the attestation requirements and procedures, as well as the GCPCA Webform itself, are listed in the “Get Started” section of your Dashboard.

*Note: File sizes shown in screenshots may not match file size of downloaded files due to various constraints based on the browser used and the user’s overall computer system.*

Your Dashboard also includes “Start a new submission” and “Start a new Gag Clause Prohibition Compliance Attestation” buttons, which allow users to start their GCPCA.

*Note: If this is your first time in the Webform, the “Submissions” table will be blank.*

Figure 7 - GPCCA Dashboard

## GPCCA Dashboard

Welcome to the Gag Clause Prohibition Compliance Attestation (GPCCA) dashboard! Your GPCCA can be made here. The GPCCA is required under the Consolidated Appropriations Act, 2021.

### Submissions

To view or continue your submission, select the Submission ID.

Showing 1 to 2 of 2 Submissions

Submission ID	Name	Year	Status
<a href="#">6239</a>	Jane Doe	2024	<span style="color: blue;">↻</span> In Progress <span style="float: right; color: red;">🗑</span>
<a href="#">5718</a>	First Last	2021-2023	<span style="color: green;">✔</span> Complete <span style="float: right; color: red;">🗑</span>

[Status Definitions](#)

+ Start a new submission

10

Submissions per page

### Get started

Please read the GPCCA Annual Submission Instructions before starting your submission.

[Instructions for submitting the GPCCA](#)  
[PDF - 832KB]

[User Manual for submitting the GPCCA](#)  
[PDF - 654KB]

#### Download Responsible Entity Excel Template

If you are submitting an Attestation on behalf of more than one Responsible Entity, identify the entities using this template.

[Responsible Entity Excel Template](#)  
[XLSX - 630KB]

📄 Start a new Gag Clause Prohibition Compliance Attestation

## 6 - Get started with your GPCCA submission

Once you are logged into the GPCCA submission Webform, you can begin the process of submitting an attestation. Start by going to the “Get started” section, located directly below the “Submissions” section (Figure 8) on the Dashboard, to download all of the GPCCA documents.

Download, open, and read the GCPCA Webform Instructions to learn about the attestation requirements and how to complete the Webform. The Instructions and User Manual can be downloaded by selecting the links in the “Get Started” section.

*Multiple Responsible Entities.* If you are submitting an attestation on behalf of more than one Responsible Entity, then download the Responsible Entity Excel Template and list each Entity using this template. A Responsible Entity is the plan or issuer that is required by law to make the attestation.

**\*Note: Additional instructions for completing and submitting the Responsible Entity Excel Template for multiple-entity attestations are in Section 14 and Section 17 of this Manual.**

**Figure 8 - Get Started Section**



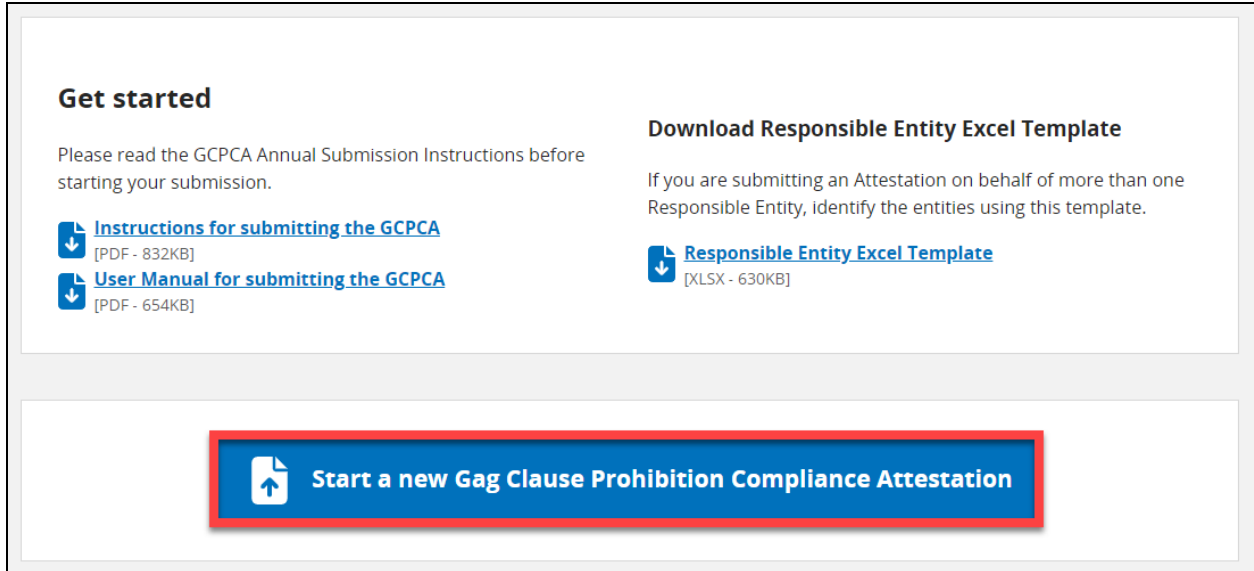
## 7 - Start a New Gag Clause Prohibition Compliance Attestation

To start a new GCPCA submission, select one of the following buttons:

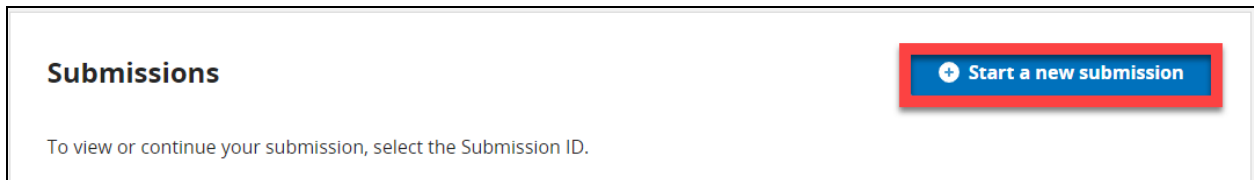
- “Submit Gag Clause Prohibition Compliance Attestation,” located on the bottom of the page, under the “Get started” section (Figure 9).
- “Start a New Submission,” located in the “Submissions” section at the top of the page (Figure 10).

Either button will take the user to Step 1 - Enter the Submitter’s Contact Information.

**Figure 9 - Start a New Gag Clause Prohibition Compliance Attestation, Button**



**Figure 10 - Start a New submission, Button**



## 8 - Step 1 - Enter the Submitter’s Contact Information

After selecting “Submit Gag Clause Prohibition Compliance Attestation” or “Start a new submission,” users enter the year for which they are attesting, information about the Submitter, and information about the Submitter’s employer (Figure 11).

(Note that the individual who will make the attestation on behalf of the Responsible Entity is called the Attester. The Attester may have someone else, known as the Submitter, fill in the required information on the Webform before the Attester makes the attestation.)

**Figure 11 - Enter the Submitter's Contact Information**

1

Enter the Submitter's contact information

Select the attestation year and enter the name and contact information of the person completing the required fields (and the Excel Template if attesting for multiple Responsible Entities). This person is the "Submitter" and will be contacted in the event we have any questions.

**\* Attestation year**  
 Select the year for which you're submitting; this is the ending year if the GPCCA covers multiple years.

2024

**\* Submitter's first and last name**

Jane Doe

**\* Submitter's position title**

CEO

**\* Submitter's e-mail address**

Jane@Doe.com

**\* Submitter's phone number**  
 Enter a phone number in the following format: "(xxx) xxx-xxxx".

(123) 456-7890

**\* Submitter's employer name**

Jane Doe LLC

**\* By what type of entity are you employed?**  
 Select all options that apply to your entity.  
[View examples](#)

- Health insurance issuer/insurer
- ERISA group health plan (GHP) or sponsor of ERISA plan, including a plan sponsored or established by a union
- (Non-Federal) governmental group health plan
- Church plan
- Third-party administrator (TPA)
- Pharmacy benefit manager (PBM)
- Behavioral health manager (BHM)
- Other third-party network or service provider (e.g., agent/broker)

Save and continue

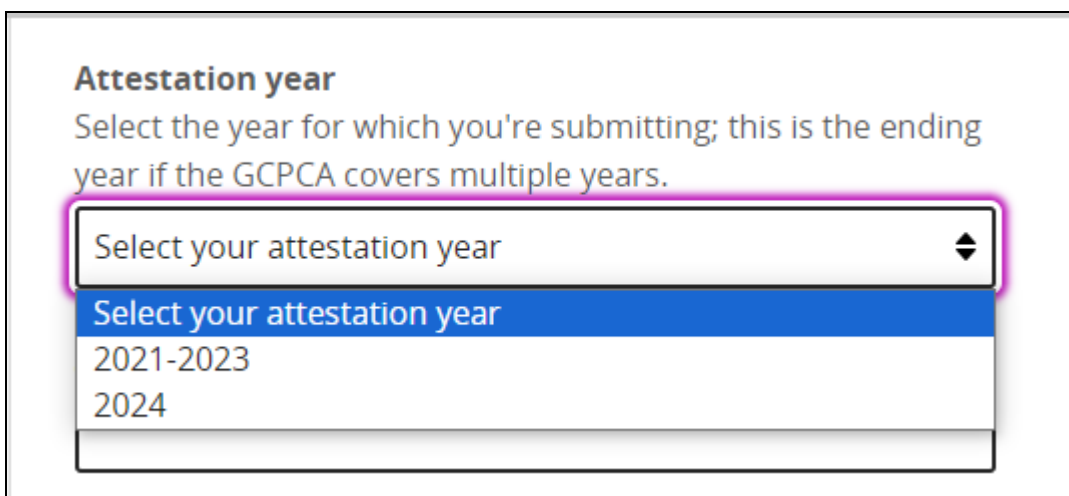
Save and exit

In Step 1, enter the name and contact information of the person submitting the form. This person will be contacted in the event the Departments have any questions regarding the submission. Enter the required information:

- Attestation year (see Figure 12 for current options in the drop-down)
  - Submitter's first and last name
  - Submitter's position title
  - Submitter's e-mail address
- \*Note: The email address used to login will automatically pre-populate in this box and cannot be edited.*
- Submitter's telephone number
  - Submitter's employer name
  - The type of entity that employs the submitter (see Figure 13 for current types of entities available for selection).

*\*NOTE: Select all options that apply to your entity. If you need further clarification, select the "View examples" hyperlink to open the "Entity details help" tray (Figure 14). To close the "Entity details help" tray, select the "Close" button.*

**Figure 12 - Attestation Year Selection Options**



**Attestation year**  
Select the year for which you're submitting; this is the ending year if the GCPCA covers multiple years.

Select your attestation year

Select your attestation year

2021-2023

2024

**Figure 13 - By What Type of Entity Are You Employed?, Selection Options**

*\*Note: "Other third-party service provider name" input field will only be displayed if "Other third-party network or service provider (e.g., agent/broker)" is selected.*



**\* By what type of entity are you employed?**  
Select all options that apply to your entity.  
[View examples](#)

- Health insurance issuer/insurer
- ERISA group health plan (GHP) or sponsor of ERISA plan, including a plan sponsored or established by a union
- (Non-Federal) governmental group health plan
- Church plan
- Third-party administrator (TPA)
- Pharmacy benefit manager (PBM)
- Behavioral health manager (BHM)
- Other third-party network or service provider (e.g., agent/broker)

**\* Other third-party service provider name**

Figure 14 - Entity Type Information

## Entity Type Information Close

Select all options that apply to your entity.

**Example 1**  
If you work for a health insurance issuer that also functions as a Third-Party Administrator for self-insured ERISA plans, and you are submitting an attestation for the issuer and the self-insured ERISA plans, select both "Health Insurance Issuer" and "Third Party Administrator."

**Note:** *In this example, do not select "ERISA group health plan (GHP)" since they are not the submitter.*

**Example 2**  
If you work for a Pharmacy Benefits Manager and you are submitting an attestation on behalf of an ERISA plan or an issuer with respect to the issuer's pharmacy benefits, select "Pharmacy Benefits Manager".

**Note:** *In this example do not select "ERISA plan" or "Health Insurance Issuer".*

**Example 3**  
If you work for a health insurance issuer that is attesting on behalf of a fully insured group health plan, select "Health Insurance Issuer."

**Note:** *Do not select the applicable type of group health plan.*

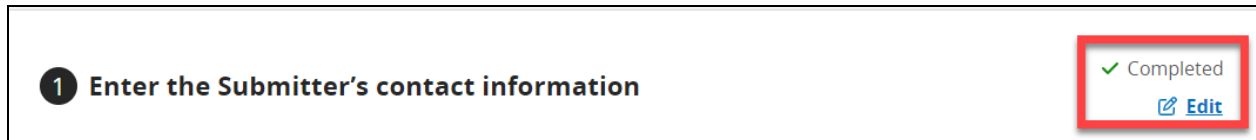
**Example 4**  
If you work for a plan or issuer that is attesting on its own behalf, select either "Health Insurance Issuers" or the applicable type of group health plan.

**Note:** *Please select the entity type(s) that you represent.*

- Select “Save and continue” to save your work and move on to Step 2, or Select “Save and exit” to save your progress and return to the attestation later. This can be accomplished from the Submissions Table on the GCPCA Dashboard.

*\*Note: If “Save and continue” is selected, then the user will see a green check mark showing that Step 1 has been completed, as well as an “Edit” button (Figure 15) which will allow the user to go back and make any necessary edits.*

**Figure 15 - The Submitter’s Contact Information Section, Completed**



## 9 - Step 2 - Enter the Attester’s contact information

To enter the Attester’s contact information (Figure 16), follow the steps in Option A if the Submitter and the Attester **are** the same person, or follow the steps in Option B if the Submitter and the Attester **are not** the same person.

*\*Note: This should be the person who will electronically sign the attestation and who has the legal authority to attest for, or on behalf of, the Responsible Entity(ies).*

**Figure 16 - Enter Attester's Contact Information**

**2 Enter the Attester's contact information**

---

Enter the Attester's name and contact information. This should be the person who will electronically sign the attestation and has the legal authority to attest for, or on behalf of, the Responsible Entity(ies). In some cases, the Attester and the Submitter are the same person. If they are, select the checkbox below.

Submitter is the same as the Attester

**\* Attester's first and last name**

**\* Attester's position title**

**\* Attester's e-mail address**

**\* Attester's phone number**  
 Enter a phone number in the following format: "(xxx) xxx-xxxx".

**\* Attesting Entity (Attester's Employer)**

**Option A:** If the Submitter **IS** the same person as the Attester:

- Select the checkbox at the top of the page (Figure 17).  
*\*Note: This will automatically populate the fields with the same information as that in the Submitter's contact information section.*
- Select "Save and continue" to save your work and move on to Step 3, or Select "Save and exit" to save your progress and return to the attestation later. This is accomplished from the Submissions Table on the GPCCA Dashboard.  
*\*Note: If "Save and continue" is selected, you will see a green check mark showing that Step 2 has been completed, as well as an "Edit" button (Figure 19), which will allow you to go back and make any necessary edits.*

**Figure 17 - Submitter IS the Same as the Attester**

**2 Enter the Attester's contact information**

---

Enter the Attester's name and contact information. This should be the person who will electronically sign the attestation and has the legal authority to attest for, or on behalf of, the Responsible Entity(ies). In some cases, the Attester and the Submitter are the same person. If they are, select the checkbox below.

Submitter is the same as the Attester

**\* Attester's first and last name**

**\* Attester's position title**

**\* Attester's e-mail address**

**\* Attester's phone number**  
 Enter a phone number in the following format: "(xxx) xxx-xxxx".

**\* Attesting Entity (Attester's Employer)**

**Option B:** If the Submitter **IS NOT** the same person as the Attester, **DO NOT** select the checkbox and enter the required information (Figure 18):

- Attester's first and last name
- Attester's position and title
- Attester's e-mail address
- Attester's phone number
- Attesting Entity (Attester's employer)
- Select "Save and continue" to save your work and move on to Step 3, or Select "Save and exit" to save your progress and return to the attestation later. This is accomplished from the Submissions Table on the GPCCA Dashboard.

*\*Note: If “Save and continue” is selected, you will see a green check mark showing that Step 2 has been completed, as well as an “Edit” button (Figure 19), which will allow you to go back and make any necessary edits.*

**Figure 18 - Submitter IS NOT the Same as the Attester**

**2 Enter the Attester’s contact information**

---

Enter the Attester's name and contact information. This should be the person who will electronically sign the attestation and has the legal authority to attest for, or on behalf of, the Responsible Entity(ies). In some cases, the Attester and the Submitter are the same person. If they are, select the checkbox below.

Submitter is the same as the Attester

**\* Attester's first and last name**

**\* Attester's position title**

**\* Attester's e-mail address**

**\* Attester's phone number**  
 Enter a phone number in the following format: "(xxx) xxx-xxxx".

**\* Attesting Entity (Attester's Employer)**

[Save and continue](#) [Save and exit](#)

**Figure 19 - The Attester’s Contact Information Section, Completed**

**2 Enter the Attester’s contact information**

✓ Completed  
[Edit](#)

## 10 - Step 3 - Enter Responsible Entity’s Details

To complete the Enter Responsible Entity’s section, follow the steps in Option A if you are only attesting for one Responsible Entity, and follow the steps in Option B if you are attesting for more than one Responsible Entity.

**Option A:** Use the Webform to attest for **one** Responsible Entity.

- Select “No” Radio button (Figure 20).

**Figure 20 - Enter the Responsible Entity’s Details, “No” Radio Button Option Selected**

**3 Enter Responsible Entity's details**

---

If you are submitting on behalf of more than one group health plan or more than one issuer, select Yes.

Yes

No

Enter the required information. There is also space for optional information, if needed:

- Name of Responsible Entity (Figure 21)
- Responsible Entity Type (Figure 21– Note: for a complete list of the available options that are in the drop-down menu, see Figure 22.)  
*\*Note: Select the “Blue Question Mark” next to Responsible Entity Type for more information on each Responsible Entity type (Figure 23). Select “Close” to close the help tray window.*
- Name of Responsible Entity point-of-contact (Figure 21)
- Employer identification number (Figure 21)
- Plan Number (Figure 21)  
*\*NOTE: This field is only displayed if “ERISA group health plan (GHP)” is selected from the “Responsible Entity type” drop-down.*
- Mailing address for the Responsible Entity (Figure 21)
- E-mail address for the Responsible Entity point-of-contact (Figure 24)
- Phone number for the Responsible Entity point-of-contact (Figure 24)
- Are you attesting for all provider agreements?
  - Select “Yes” if attesting for all (Figure 25)
  - Select “No” if attesting for just some of them (Figure 26)*\*Note: “Describe your other provider agreement type(s)” will only display if “Other” is selected.*
- Enter or Select Start date for Attestation Period (Figure 26)  
*\*Note: Select the “Previous attestation date” (Figure 28) button to enter the GCPCA submission date (plus one day if the Responsible Entity has previously attested) and then*

select “Use selected date” (Figure 29). If the user needs to edit the start date, the user can do so by selecting the “Edit my start date” button (Figure 27).

- Enter the End date of the period covered by the Attestation (Figure 26)
- Additional Information (Figure 26)  
*\*Note: This is not a required field and is optional.*
- Select “Save and continue” to save your work and move on to Step 4, or Select “Save and exit” to save your progress and return to the attestation later. This can be accomplished from the Submissions Table on the GCPCA Dashboard.  
*\*Note: If “Save and continue” is selected and the Submitter is the same as the Attester, you will see a green check mark showing that Step 3 has been completed, as well as an “Edit” button (Figure 30) which allows you to go back and make any necessary edits.*

**\*NOTE: If the Attester is different than the Submitter,** after the Submitter has selected “Save and continue,” instead of moving on to Step 4, the “Let’s confirm the Attester’s email address” pop-up will display (Figure 31). The Submitter will need to confirm that the Attester’s email address is correct. Once the Submitter has verified the email address is correct, the Submitter selects “Send email”. The system will send the Attester an access code, the GCPCA system link, and a Submission ID for reference.



Figure 21 - Enter the Responsible Entity's Details for a Single Entity. Part 1

**3 Enter Responsible Entity's details**

If you are submitting on behalf of more than one group health plan or more than one issuer, select Yes.

Yes  
 No

**Responsible Entity's Details**

Please add the entity details for the entity you are submitting this attestation on behalf of.

Note: If you are submitting on behalf of yourself, the entity details you enter will need to represent your entity.

\* **Name of Responsible Entity**

John Doe LLC

\* **Type of Responsible Entity** ?

ERISA group health plan (GHP)

\* **Name of Responsible Entity's point-of-contact**

John Doe

\* **Employer Identification Number**

222222222

\* **ERISA Plan Number**

This only applies if you are an ERISA plan.

123

\* **Mailing address for the Responsible Entity**

123 ABC St Somewhere, VA 12345

Figure 22 – Type of Responsible Entity Drop-down Options

\* **Type of Responsible Entity** ?

Please select an option

Please select an option

Church plan

ERISA group health plan (GHP)

(Non-Federal) governmental group health plan

Health insurance issuer/insurer

Figure 23 - Responsible Entity Type Help Tray

## Responsible Entity Type Help Close

The term "**Church plan**" refers to a plan established and at all times maintained for its employees by a church or by a convention or association of churches which is exempt from tax under section 501(a) of the Internal Revenue Code, provided that such plan meets the requirements of section 501(b) and (if applicable) section 501(c).

The term "**ERISA Group Health Plan**" refers to an employee welfare benefit plan established or maintained by a private-sector employer or by a private-sector employee organization (such as a union), or both, that provides medical care for participants or their dependents directly or through insurance, reimbursement, or otherwise.

The term "**Non-Federal governmental plan**" refers to a governmental plan that is not a Federal governmental plan. Some examples of non-Federal governmental plans are plans that are sponsored by states, counties, school districts, and municipalities. See <https://www.cms.gov/CCIIO/Programs-and-Initiatives/Health-Insurance-Market-Reforms/nonfedgovplans>.

The term "**health insurance issuer/insurer**" means an insurance company, insurance service, or insurance organization (including a health maintenance organization) which is licensed to engage in the business of insurance in a state and which is subject to state law which regulates insurance. This term does not include a group health plan.

**Figure 24 - Enter the Responsible Entity's Details, Single Entity Part 2**

*\*Note: "Describe your other provider agreement type(s)" input field will only be displayed if "other" is selected.*

**\* E-mail address for the Responsible Entity's point-of-contact**

  
**\* Phone number for the Responsible Entity's point-of-contact**  
Enter a phone number in the following format: "(xxx) xxx-xxxx".  
  
**\* Are you attesting for all provider agreements?**  
Examples include Medical, Pharmacy benefit manager, Behavioral health network and/or Other.  
 Yes  
 No  
**\* Select the specific type of provider agreement(s) that apply. If you are attesting for a specific provider agreement other than, or in addition to, medical, pharmacy benefit, or behavioral health, choose "other," and enter the specific provider agreement type into the text box.**  
Select at least one option below.  
 Medical network  
 Pharmacy benefit manager network  
 Behavioral health network  
 Other  
**\* Describe your other provider agreement type(s)**

**Figure 25 - Attesting For All Provider Agreements**

**\* Are you attesting for all provider agreements?**

Yes  
 No

**Attestation Period**  
Enter the start and end dates that your attestation covers. If you attested last year and would like to use the end date of your previous submission as your start date for the current submission, select "previous attestation end date" below.

**Figure 26 - Attestation Period and Other Relevant Information, Not Completed**

**Attestation Period**  
Enter the start and end dates that your attestation covers. If you attested last year and would like to use the end date of your previous submission as your start date for the current submission, select "previous attestation end date" below.

**\* Start date**  
For example: January 19 2021

Month Day Year  
Select a month

**\* End date**  
For example: January 19 2022

Month Day Year  
Select a month

**Additional Information**  
Provide any other information that is relevant to this attestation.  
1000 characters remaining

**Figure 27 - Attestation Period and Other Relevant Information, Completed**

### Attestation Period

Enter the start and end dates that your attestation covers. If you attested last year and would like to use the end date of your previous submission as your start date for the current submission, select "previous attestation end date" below.

**\* Start date**  
For example: January 19 2021

Month	Day	Year	
09 - September ▾	17	2023	<a href="#">Edit my start date</a>

**\* End date**  
For example: January 19 2022

Month	Day	Year
09 - September ▾	16	2024

### Additional Information

Provide any other information that is relevant to this attestation.  
985 characters remaining

This is a test.

[Save and continue](#)[Save and exit](#)

**Figure 28 - Last Year's Completed Submissions, With "Use selected date" Option Disabled**

**Last year's completed submissions** [✕ Close](#)

Select the completed attestation submitted date that you want to use as your attestation start date. The start date will be one day after the submitted date.

Showing 1 to 1 of 1 Submissions

	Submission ID	Entity Name	Entity FEIN	Submitted date
<input type="radio"/>	5718	Jane Doe LLC	222222222	09/16/2023

[Cancel](#)

**Figure 29 - Last Year's Completed Submissions, With "Use selected date" Option Enabled**

**Last year's completed submissions** [✕ Close](#)

Select the completed attestation submitted date that you want to use as your attestation start date. The start date will be one day after the submitted date.

Showing 1 to 1 of 1 Submissions

	Submission ID	Entity Name	Entity FEIN	Submitted date
<input checked="" type="radio"/>	5718	Jane Doe LLC	222222222	09/16/2023

[Cancel](#)

**Figure 30 - The Responsible Entity's Details Section, Completed**

**3 Enter Responsible Entity's details** 
✓ Completed   
[Edit](#)

**Figure 31 - Confirm Attester's E-mail Address Section When the Attester and Submitter Are Not the Same Person**

**Let's confirm the Attester's e-mail address.** [✕ Close](#)

Verify that the Attester's e-mail is correct, if not please enter the correct e-mail address. Once verified, an access code will be generated from submissions@cms.hhs.gov and e-mail to your chosen Attester.

**\* Attester's e-mail address**

Please notify the Attester that they will be receiving an e-mail from submissions@cms.hhs.gov. Have the Attester follow the instructions in the e-mail to complete the submission. Please have the Attester check their junk mail just in case the e-mail was not received. If for any reason the e-mail was not received or has expired, please apply for a new access code from the home page.

**Send E-mail** [Cancel](#)

**Option B:** Upload the Responsible Entity Excel Template in the GCPCA Webform to attest for **multiple** Responsible Entities. See User Manual Sections 14 and 15, and Table 2 (Section 17) for instructions on how to complete the Responsible Entity Excel Template.

Steps to upload completed Responsible Entity Excel Template (Note: This will be uploaded as a tab-delimited text file):

- Select "Yes" Radio button (Figure 32).

**Figure 32 - Enter the Responsible Entity's Details Section With the "Yes" Radio Button Selected**

### 3 Enter Responsible Entity's details

---


If you are submitting on behalf of more than one group health plan or more than one issuer, select Yes.

Yes  
 No

#### Responsible Entity Details

Complete and upload the **Responsible Entity Excel Template** for entities on whose behalf you are submitting the attestation. For detailed instructions, please select the "View detailed instructions" link and also refer to the GPCCA User Manual.  
[View detailed instructions](#)

**\* Upload entity list**  
The entity list must be in text tab-delimited format.

  
Drag files here or [choose from folder](#)

**Additional Information**  
Provide any other information that is relevant to this attestation.  
1000 characters remaining

Upload the completed Responsible Entity Excel Template as a tab-delimited text file. Enter additional information, if needed:

- If you are providing information for multiple Responsible Entities, you will need to complete and then upload the Responsible Entity Excel Template  
*\*Note: The following sources are available for guidance on completing and uploading the Excel Template:*
  1. In this document, go to sections [14 and 15](#)

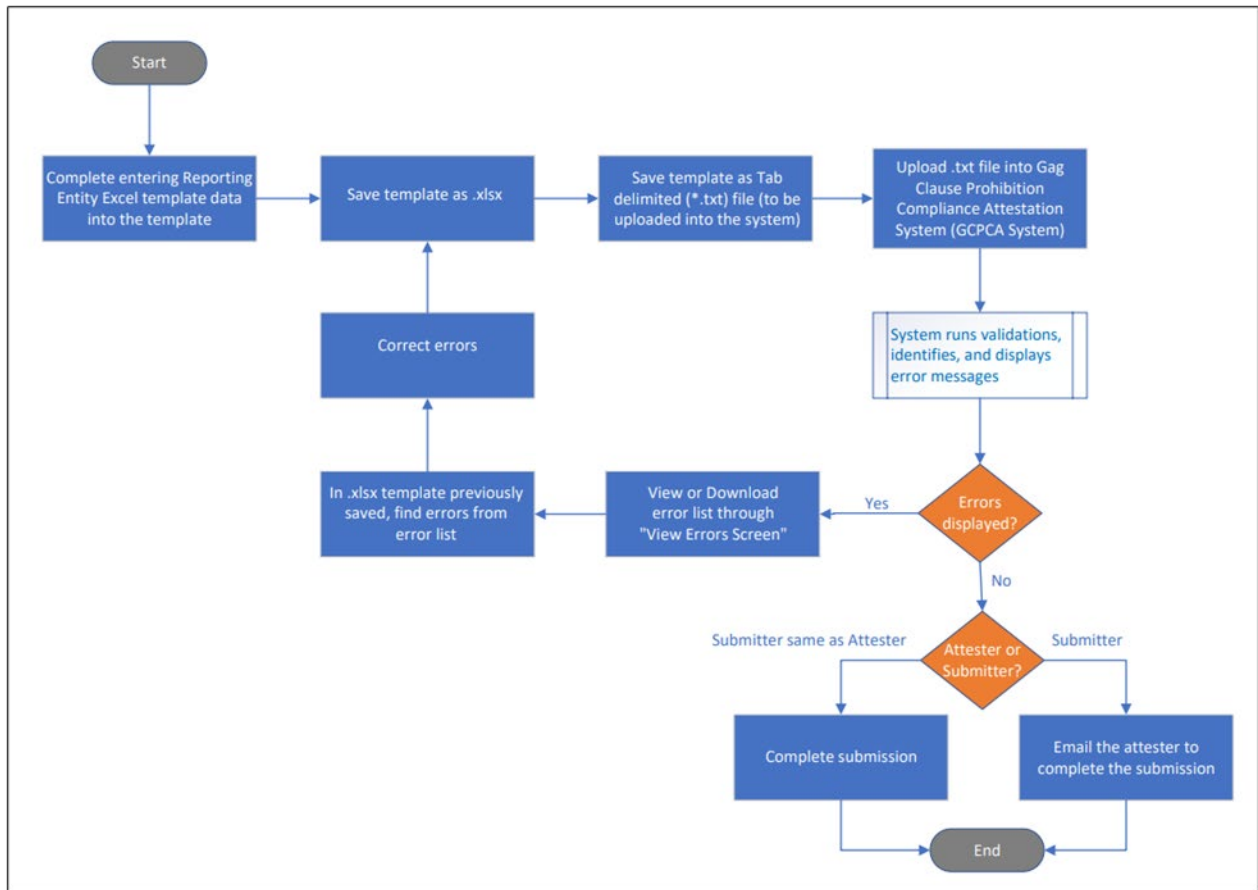


2. *In the webform, select the “View detailed instructions” hyperlink (also shown below as Figure 34)*
  3. *In the GCPCA Form Instructions, the link for the instruction PDF file can be found in the “Get Started” section on the GCPCA Dashboard (Figure 7).*
- Additional Information (Figure 34)  
*\*Note: This is not a required field and is optional.*
  - Select “Save and continue” to save your work and move on to Step 4, or Select “Save and exit” to save the record and return to the attestation later. This can be accomplished from the Submissions Table on the GCPCA Dashboard.  
*\*Note: If “Save and continue” is selected and the Submitter is the same as the Attester, you will see a green check mark showing that Step 3 has been completed, as well as an “Edit” button (Figure 30) which will allow you to go back and make any necessary edits.*

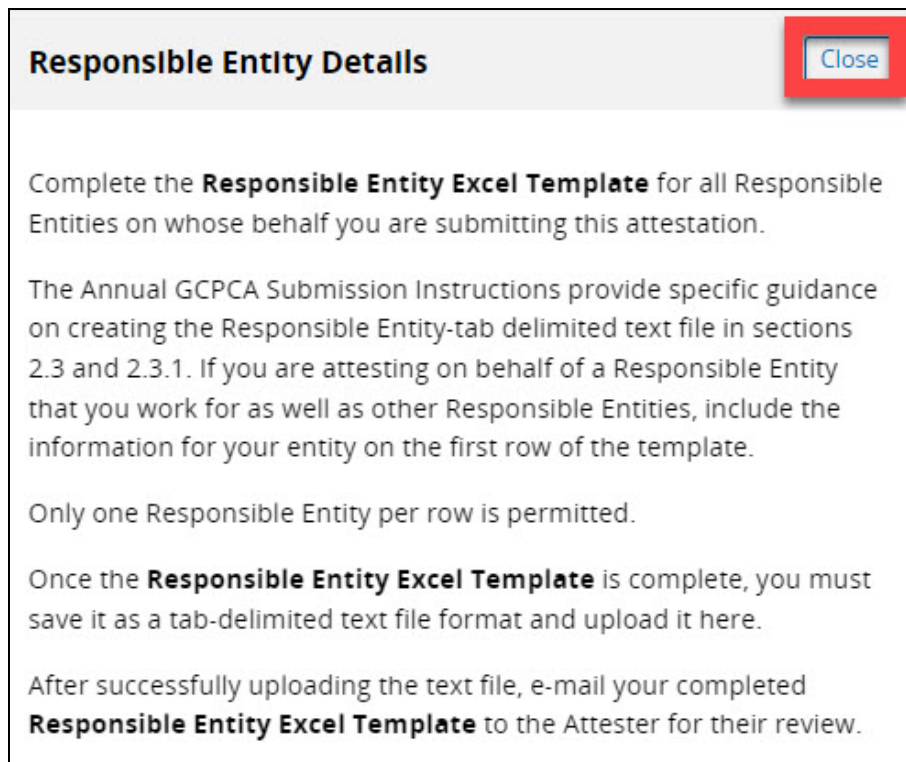
**\*NOTE: If the Attester is different than the Submitter,** after the Submitter has selected “Save and continue,” instead of moving on to Step 4, the following pop-up will be displayed: “Let’s confirm the Attester’s email address” (Figure 35). The Submitter will need to confirm that the Attester’s email address is correct. Once the Submitter has verified that the email address is correct, the Submitter will select “Send email”. The system will send the Attester an access code, the GCPCA system link, and a Submission ID for reference.

*\*Note: The system will validate the Excel Template upon upload. The Submitter will have to correct any errors before proceeding (Figure 61). See Section 15 for more details on correcting errors.*

**Figure 33 - Multiple Responsible Entity Attestation Work-Flow**



**Figure 34 - Responsible Entity Details Help Information**



## 11 - Step 4 - Review your submission and attest

The Attester and Submitter must both review the submission. If edits are needed, the Submitter will make them.

- The Attester selects the “Submission ID” hyperlink from the Submissions Table (Figure 7).
  - The Attester should review the information for accuracy.
  - The Attester advises the Submitter if changes are needed as the Attester cannot make any edits to the GCPCA submission.
- The Submitter will also review the submission and make any needed edits by selecting the “Edit” button for the applicable section (Figure 35, Figure 36, and Figure 37).
- The Attester will select “Save and continue” to save the work and move on to Step 5, or Select “Save and exit” to save their progress and return to the attestation later. This is accomplished from the Submissions Table on the GCPCA Dashboard.
 

*\*Note: If “Save and continue” is selected, the user will see a green check mark showing that Step 4 has been completed, as well as an “Edit” button (Figure 38) which will allow the user to go back and make any necessary edits.*

**Figure 35 - Review Your Submission and Attest, Submitter’s and Attester’s Contact Information**

4

Review your submission and attest

If the information below is correct, add your attestation below and then select the "Submit" button to complete your submission. If you need to change any previously entered information, use the edit buttons to return to the appropriate step and make your changes.

Submitter's contact information

✎ Edit

<b>Attestation year</b> 2024	<b>Submitter's first and last name</b> Jane Doe	<b>Submitter's position title</b> CEO
<b>Submitter's e-mail address</b> <u>Jane@Doe.com</u>	<b>Submitter's phone number</b> (123) 456-7890	<b>Submitter's employer name</b> Jane Doe LLC

**Entity**  
ERISA group health plan (GHP) or sponsor of ERISA plan, including a plan sponsored or established by a union

Attester's contact information

✎ Edit

<b>Attester's first and last name</b> John Doe	<b>Attester's position title</b> CFO	<b>Attester's e-mail address</b> John@Doe.com
<b>Attester's phone number</b> (123) 456-7890	<b>Attesting entity (Attester's employer)</b> Jane Doe LLC	

Figure 36 - Review Your Submission and Attest, Single Responsible Entity

**Responsible Entity's attestation detail** Edit

<b>Responsible Entity's name</b> John Doe LLC	<b>Responsible Entity's type</b> ERISA group health plan (GHP)	<b>Responsible Entity's point of contact</b> John Doe
<b>Responsible Entity's EIN</b> 222222222	<b>ERISA Plan Number</b> 123	<b>Responsible Entity's mailing address</b> 123 ABC St Somewhere, VA 12345
<b>Responsible Entity's e-mail address</b> John@Doe.com	<b>Responsible Entity's phone number</b> (123) 456-7890	<b>Provider agreement type(s)</b> Imaging Benefits


**Attestation Period**  
09-17-2023 to 09-16-2024

**Additional Information**  
This is a test.

Save and continue Save and exit

Figure 37 - Review Your Submission and Attest, Multiple Responsible Entities

**Responsible Entity's attestation detail** Edit

 [GPCCA-Responsible-Entity-Template Jun2024 v6.txt](#)  
(199 KB)

**Additional Information**  
This is a test.

Save and continue Save and exit

**Figure 38 - The Review Your Submission and Attest Section, Completed**

## 12 - Step 5 Verify the Entity Type(s) for Which You Are Attesting

As the Attester, you must select, at a minimum, that you are attesting either on behalf of a group health plan or an insurance issuer:

- Thoroughly read the selections for group health plans and health insurance issuers (Table 1).
- Select one or both checkboxes next to “I’m attesting on behalf of group health plans and/or health insurance issuers” (Figure 39).
- Check the box next to “I attest that all information in this submission is accurate”.
- Enter your name as listed in Step 2 in the “Please enter your full name to sign this attestation” input field (Figure 40).
- Select “Submit” (Figure 41).
- Select “Return to dashboard” to return to your Dashboard if no receipt is needed. If receipt is needed select “Print submission receipt” on the Submission Successful pop-up window (Figure 42).
- Select “Save” to print, or save the receipt as a PDF (Figure 43)

*\*Note: This is your only chance to print and/or save the Submission receipt. If you need the receipt, print or save it at this step. If the submission is edited and resubmitted, it can be re-saved at that time.*

**Figure 39 - Step 5, Select the Entity Type(s) on Whose Behalf You Are Attesting and Read the Attestation**

**5 Verify the entity type(s) on whose behalf you are attesting**

You must, at a minimum, select that you are either attesting on behalf of a group health plan or insurance issuer. If you are attesting on behalf of both a group health plan, whether fully insured or self-funded, and an issuer of individual health insurance coverage, check both boxes.

**Group health plans, including non-federal governmental plans, and health insurance issuers offering group health insurance coverage**

I attest that, in accordance with section 9824(a)(1) of the Internal Revenue Code, section 724(a)(1) of the Employee Retirement Income Security Act, and section 2799A-9(a)(1) of the Public Health Service Act and the language herein, the group health plan(s) or health insurance issuer(s) offering group health insurance coverage on whose behalf I am signing has not, for the dates specified and as provided in the foregoing information, entered into an agreement with a health care provider, network or association of providers, third-party administrator, or other service provider offering access to a network of providers that would directly or indirectly restrict the group health plan(s) or health insurance issuer(s) from —

I'm attesting on behalf of group health plans, including non-federal governmental plans, and/or health insurance issuers offering group health insurance coverage.

**Health insurance issuers offering individual health insurance coverage**

I attest that, in accordance with section 2799A-9(a)(2) of the Public Health Service Act and the language herein, the health insurance issuer(s) offering individual health insurance coverage on whose behalf I am signing has not, for the dates specified and as provided in the foregoing information, entered into an agreement with a health care provider, network or association of providers, or other service provider offering access to a network of providers that would directly or indirectly restrict the health insurance issuer(s) from —

I'm attesting on behalf of health insurance issuers offering individual health insurance coverage.

**Figure 40 - Step 5, Confirm that the Submitted Information is Accurate**

### Attest to the Responsible Entity's compliance with the Gag Clause Prohibition Compliance requirement

I attest that I have the authority to bind the plan(s) or issuer(s) entered/uploaded in the entity attestation details.

I attest that all information in this submission is accurate.

**\* To sign this attestation, enter your full name below.**

Signed submission date  
04/04/2024 01:52 PM

[Start over](#)

**Figure 41 - Step 5, Attester, Enter Your Full Name and Submit**

I'm attesting on behalf of group health plans, including non-federal governmental plans, and/or health insurance issuers offering group health insurance coverage.

**Health insurance issuers offering individual health insurance coverage**

referring providers, enrollees, or individuals eligible to become enrollees of the plan or coverage; or

2. Sharing, for plan design, plan administration, and plan, financial, legal, and quality improvement activities, data described in item (1) with a business associate as defined in section 160.103 of title 45, Code of Federal Regulations (or successor regulations), consistent with the privacy regulations promulgated pursuant to section 264(c) of Health Insurance Portability and Accountability Act of 1996 (HIPAA), the amendments made by the Genetic Information Nondiscrimination Act of 2008 (GINA), and the Americans with Disabilities Act of 1990 (ADA).

I'm attesting on behalf of health insurance issuers offering individual health insurance coverage.

### Attest to the Responsible Entity's compliance with the Gag Clause Prohibition Compliance requirement

I attest that I have the authority to bind the plan(s) or issuer(s) entered/uploaded in the entity attestation details.

I attest that all information in this submission is accurate.

**\* To sign this attestation, enter your full name below.**

Signed submission date  
04/04/2024 01:53 PM

[Start over](#)



Figure 42 - Step 5, Submission Successful Pop-up Window

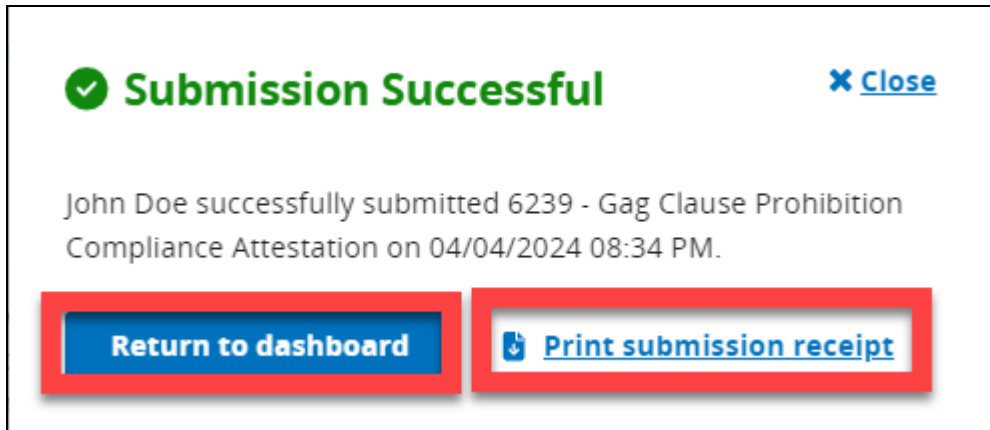
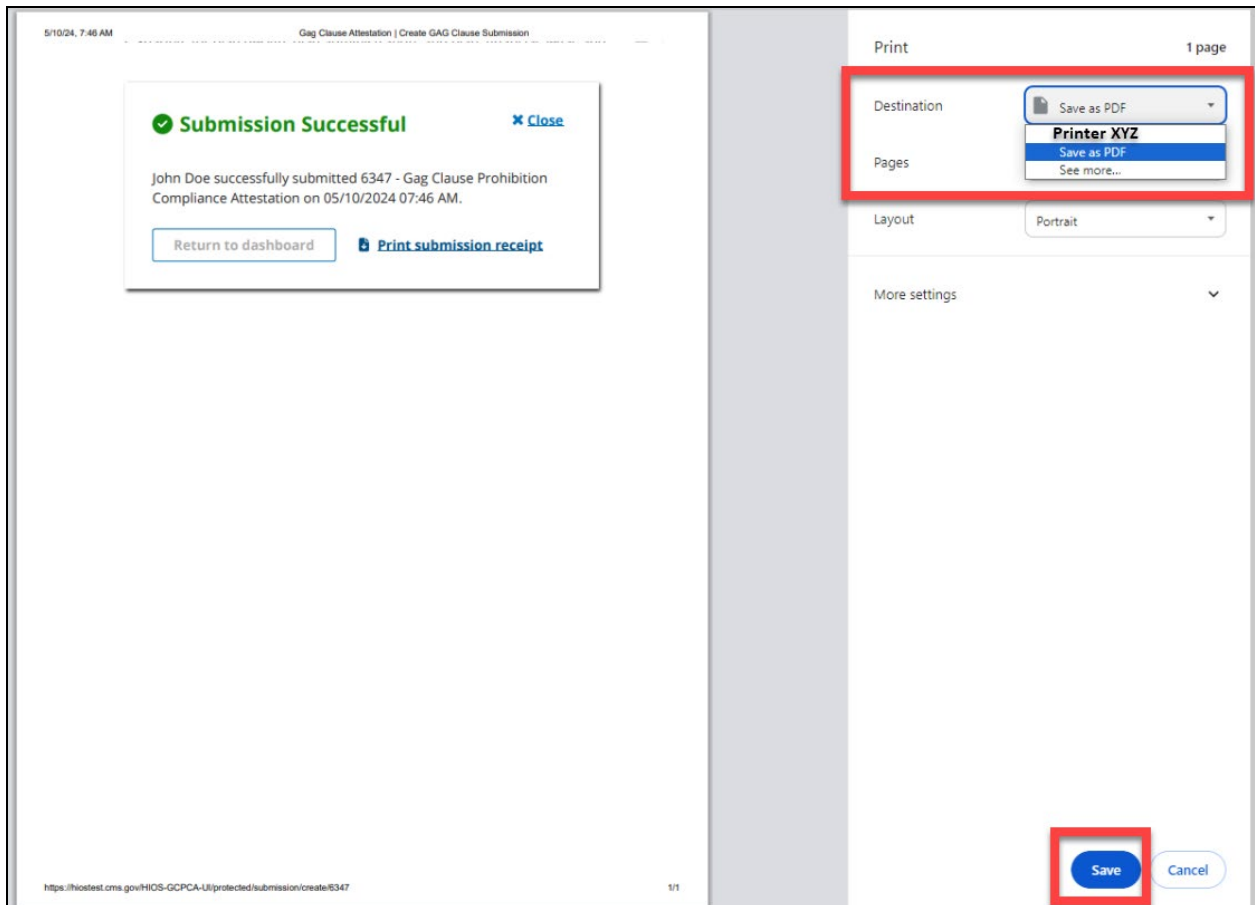


Figure 43 - Step 5, Submission Successful, with Print or Save Options



### 13- View and/or Edit a Completed Submission

Users can view and/or edit a completed submission by selecting the “Submission ID” for the Submission they want to view and/or edit from the “Submissions” table on the GPCCA Dashboard:

- Select “Submission ID” Hyperlink (Figure 44)
- Review each section (Figure 45 and Figure 46)
  - Single Responsible Entity (Figure 47)
  - Multiple Responsible Entities (Figure 48)
- Select “Print” button to print or save the submission record (Figure 45)
 

*\*Note: If “Print” is selected a pop-up will open allowing user to print a full submission record (Figure 49)*
- Select “Edit” button if any edits are needed (Figure 45)
 

*\*Note: If edits are needed, select the “Continue” option that is in the warning message. This will move the completed submission back to “In Progress”. (Figure 50).*
- Select “Delete” button to delete the submission (Figure 45)
 

*\*Note: If “Delete” is selected a warning message will appear confirming that user does want to delete the submission. (Figure 51).*

**Figure 44 - Select “Submission ID” Hyperlink**

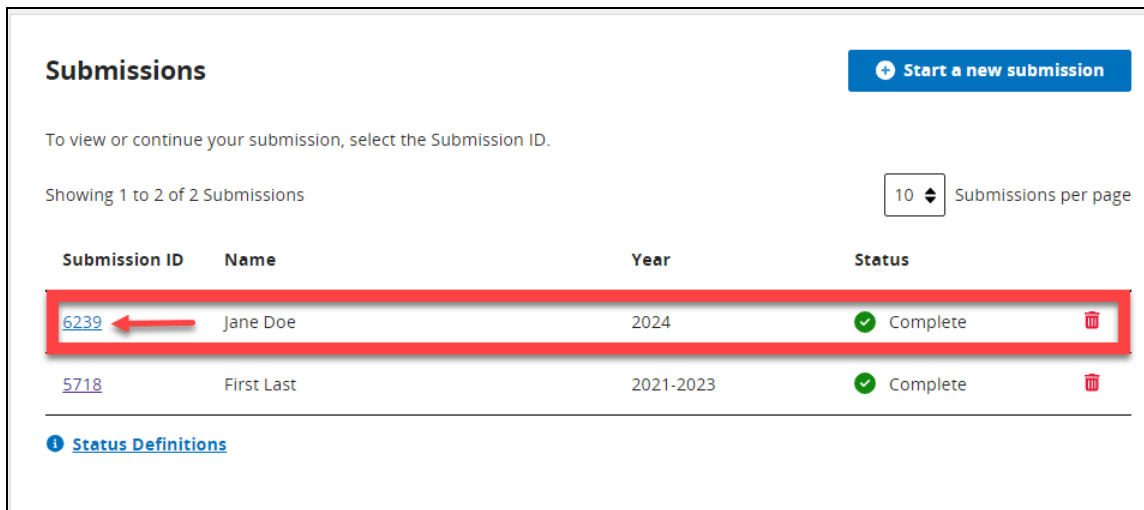


Figure 45 - View Completed GPCCA Submission, Part 1

## GPCCA Submission #6239

Below is the status and summary for your submission.

[Return to GPCCA Dashboard](#) Print Delete Edit

**Complete**  
The submission was completed and has been submitted.

### Submission details

<b>Submission status</b> Complete	<b>Submission ID</b> 6239	<b>Attestation year</b> 2024
<b>Date submitted</b> 4/5/2024		

**Figure 46 - View Completed GPCCA Submission, Part 2**

Submission details		
<b>Submission status</b> Complete	<b>Submission ID</b> 6239	<b>Attestation year</b> 2024
<b>Date submitted</b> 4/5/2024		
Submitter's contact information		
<b>Submitter's first and last name</b> Jane Doe	<b>Submitter's position title</b> CEO	<b>Submitter's e-mail address</b> ltwilleager@sbd2.com
<b>Submitter's phone number</b> (123) 456-7890	<b>Submitter's employer name</b> Jane Doe LLC	<b>Employer entity type</b> GHP
Attester's contact information		
<b>Attester's first and last name</b> John Doe	<b>Attester's position title</b> CFO	<b>Attester's e-mail address</b> John@Doe.com
<b>Attester's phone number</b> (123) 456-7890	<b>Attesting entity (Attester's employer)</b> Jane Doe LLC	

**Figure 47 - View Completed GPCCA Submission, Single Responsible Entity**

Attestation Information		
<b>Responsible Entity's name</b> John Doe LLC	<b>Responsible Entity's type</b> ERISA group health plan (GHP)	<b>Responsible Entity's EIN</b> 222222222
<b>ERISA Plan Number</b> 123	<b>Responsible Entity's mailing address</b> 123 ABC St Somewhere, VA 12345	<b>Name of Responsible Entity's point of contact</b> John Doe
<b>Responsible Entity's point of contact e-mail</b> John@Doe.com	<b>Responsible Entity's phone number</b> (123) 456-7890	<b>Provider agreement type(s)</b> Imaging Benefits
<b>Attestation Period</b> 09-17-2023 to 09-16-2024		
<b>Other information</b> Test		

**Figure 48 - View Completed GPCCA Submission, Multiple Responsible Entities**


Attestation Information
 <a href="#">GPCCA-Responsible-Entity-Template_Jun2024_v6.txt</a> (100 Bytes)
<b>Additional Information</b> This is a test

Figure 49 – Print Completed GPCCA Submission

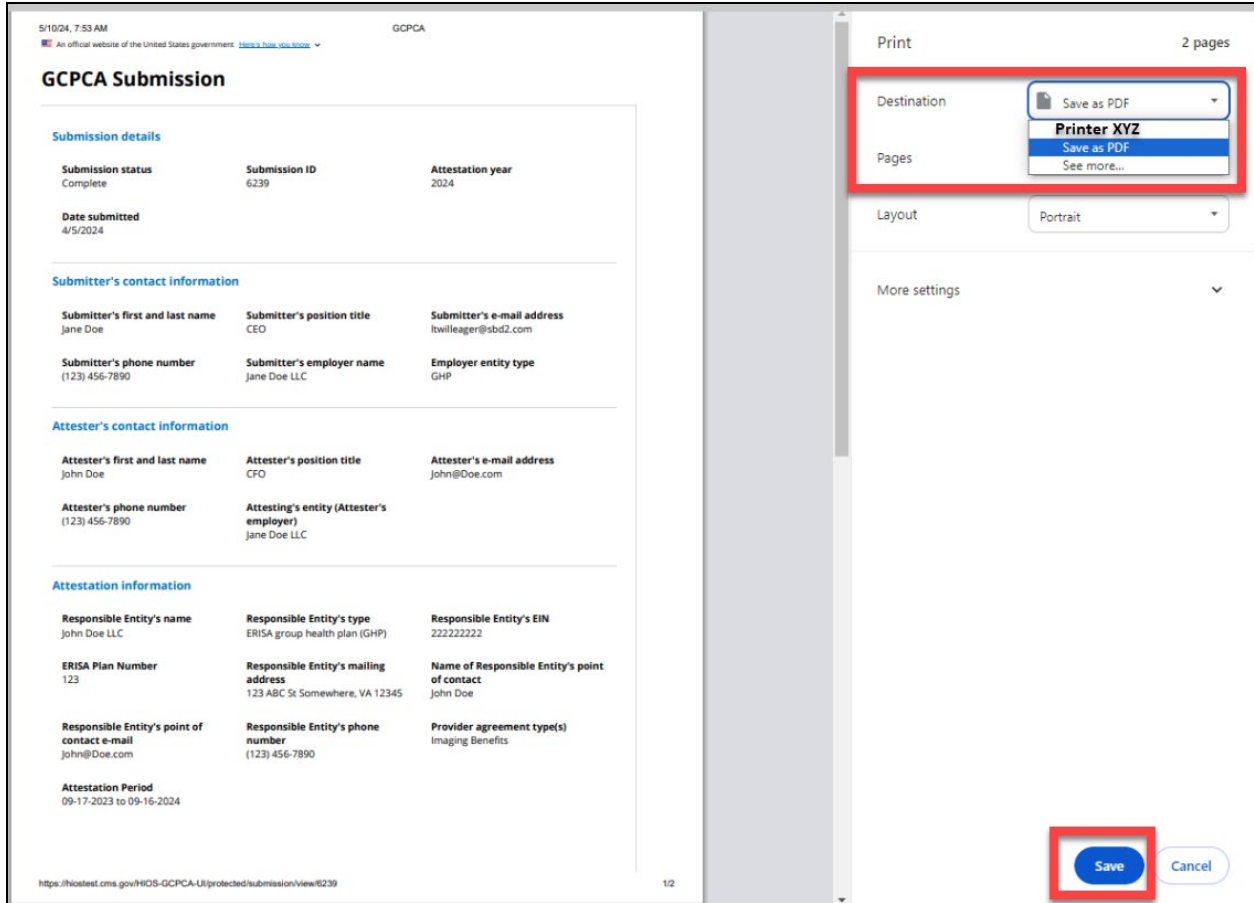
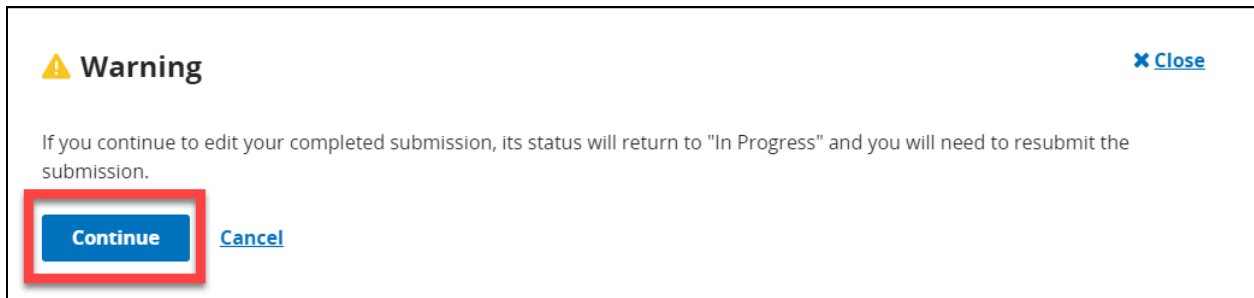
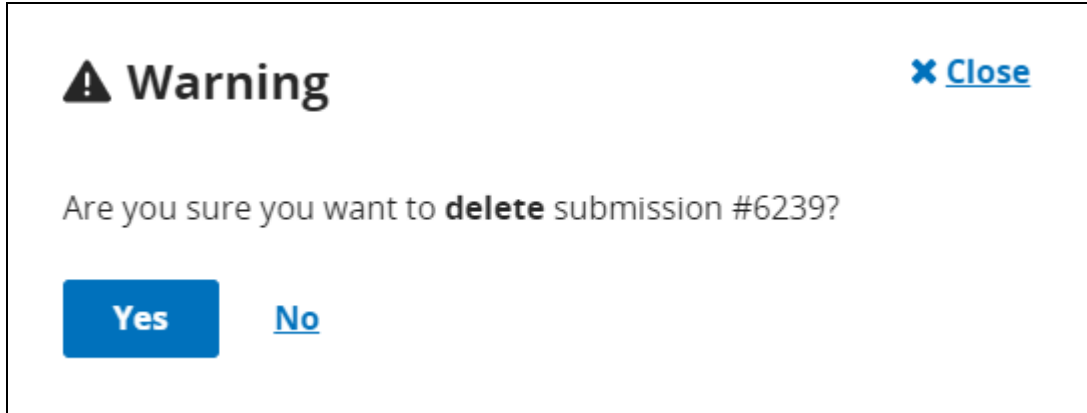


Figure 50 - Warning Message: Status of Completed GPCCA Submission Changed Back to In Progress



**Figure 51 - Warning Message: Are You Sure You Want to Delete Completed GPCCA Submission**



### 14 - How to Complete the Responsible Entity Excel Template for Step 3

If you are submitting for more than one Responsible Entity, you will need to complete the Responsible Entity Excel Template:

- Download the current version of the Excel Template from the GPCCA Dashboard (Figure 8)
- Enter information in the required fields on the template (Figure 52, Figure 53, and Figure 54).

*\*Note: See Table 2 for more details on the information that should be entered in the fields.*

*\*Note: If you are attesting on behalf of a Responsible Entity that you work for, as well as other Responsible Entities, include the information for all Entities.*

*\*Note: Only one Responsible Entity per row is permitted.*

*\*Note: Sections 2.3 and 2.3.1 in the GPCCA Form Instructions provide specific guidance on completing and uploading the Responsible Entity tab-delimited text file.*

**Figure 52 - Responsible Entity Excel Template (columns A-F)**

A	B	C	D	E	F
Required field*		Church plan, ERISA group health plan (GHP), (Non-Federal) governmental group health plan, or Health insurance issuer/insurer	Only applies to ERISA group health plans and sponsors of ERISA group health plans	Date range covered by the attestation for each Responsible Entity	
Name of Responsible Entity*	Employer Identification Number (EIN)*	Responsible Entity Type*	Plan Number	Start Date (mm-dd-yyyy)*	End Date (mm-dd-yyyy)*

**Figure 53 - Responsible Entity Excel Template (columns G-J)**

G	H	I	J
Responsible Entity Information			
Mailing Address for the Responsible Entity*	Name of Responsible Entity's Point-of-Contact*	E-mail Address for Responsible Entity's Point-of-Contact*	Phone Number for Responsible Entity's Point-of-Contact*

**Figure 54 - Responsible Entity Excel Template (columns K-P)**

K	L	M	N	O	P
If attesting for <b>all</b> of the plan's or issuer's provider agreements, place a Y in the cell below	If attesting for a specific type(s) of provider agreement <b>only</b> , place a Y below in the applicable cell(s) of the column(s) that apply; otherwise leave the column blank			If attesting for a specific type(s) of provider agreement(s) other than or in addition to those in columns L - N, list them in the cell below, separated by a semi-colon.	*Either Column K must be marked with a Y or one of the following: at least one of columns L-N must be marked with a Y and/or column O must identify one or more provider agreement types.
Attestation is for All Provider Agreements	Medical network	Pharmacy benefit manager network	Behavioral health network	Other Type(s) of Provider Agreement(s)	

- Once the information is entered in the Excel Template, you will need to first save the file in Excel format on your computer (.xlsx) (Figure 55 and Figure 56):

- Select “File”
- Select “Save As”
- Give the file a unique name
- \*Note: File names may only contain one period and that is the one before the file type (i.e. GPCCA\_2024\_CompanyA.xlsx).*
- Confirm the file type says “Excel Workbook (\*.xlsx)”
- Select “Save”

*\*Note: If you do not want to save the file in your computer’s default location, instead of selecting “Save,” select “Browse”, browse to the folder you want to save the file in, and then select “Save”.*

*\*Note: This is the file you will e-mail to your Attester if you are not the Attester. It is also the file that will be updated if there are any validation errors after upload and which can be used as a starting point for future attestations.*



Figure 55 –Save as Excel Workbook (\*.xlsx), Part 1

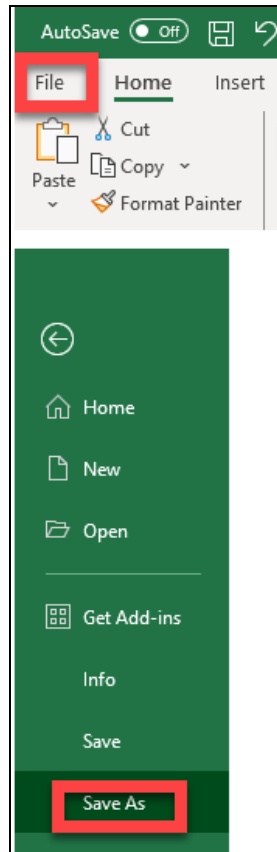
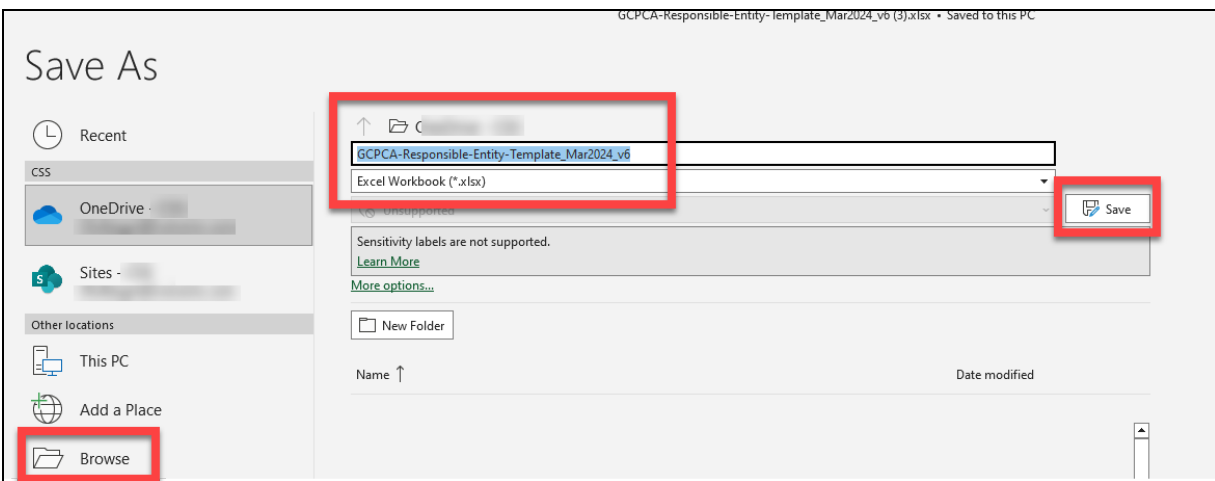


Figure 56 –Save as Excel Workbook (\*.xlsx), Part 2



- After saving the file in the Excel format (.xlsx), you need to save it as a Tab Delimited (.txt) file on your computer (Figure 57, Figure 58, and Figure 59):

- Select “File”
- Select “Save a Copy”
- Give the file a unique name

*\*Note: We recommend naming the .txt file the same name as the .xlsx file so that you know which files belong together.*

*\*Note: File names may only contain one period and that is the one before the file type (i.e. GCPCA\_2024\_CompanyA.txt).*

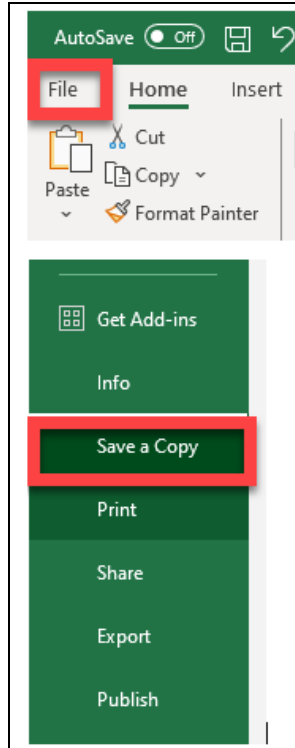
- Select “Text (Tab delimited) (\*.txt) from the file type drop-down menu)
- Select “Save”.

*\*Note: If you do not want to save the file in the default location on your computer, instead of selecting “Save” select “Browse”, browse to the folder you want to save the file in, and then Select “Save”.*

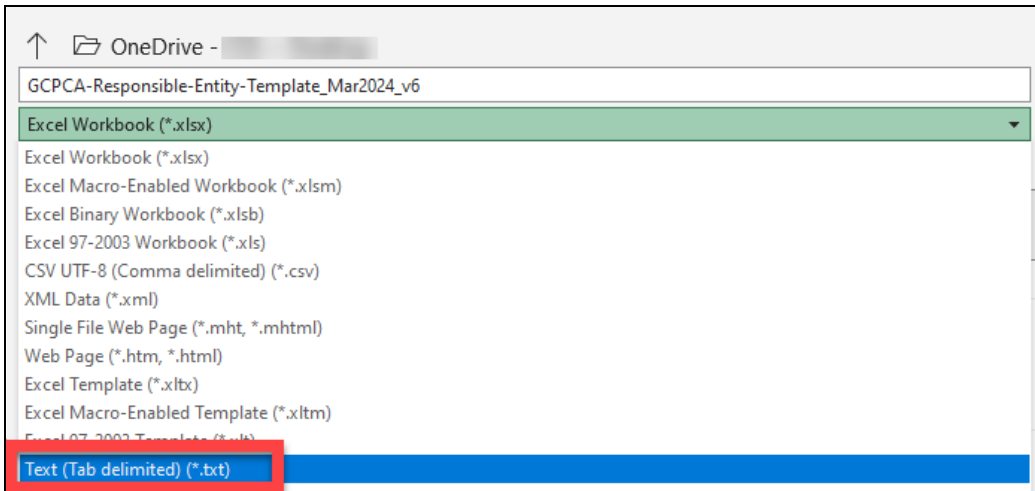
*\*Note: This is the file you will upload in Step 3 on the GCPCA Webform.*

- Login to the GCPA Webform and upload the Text (Tab delimited) (\*.txt) file in Step 3
- After **successfully uploading** the text file with no validation errors, if you **are not** the Attester, email the completed Responsible Entity Excel Template to the Attester for their review.

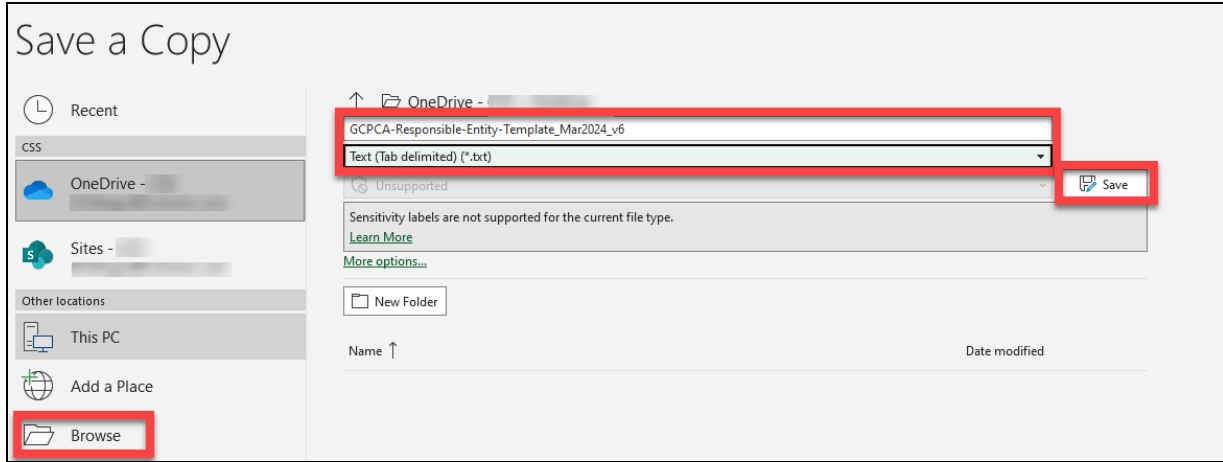
**Figure 57 –Save as Text (Tab delimited) (\*.txt), Part 1**



**Figure 58 –Save as Text (Tab delimited) (\*.txt), Part 2**



**Figure 59 –Save as Text (Tab delimited) (\*.txt), Part 3**



## 15 - Responsible Entity Excel Template Text (Tab delimited) (\*.txt) System Validations

The tab-delimited text file will be uploaded during Step 3 (Figure 32). The system will validate the Text (Tab delimited) (\*.txt) file during this process. If no System Validation errors are found, the user will see a green check mark next to the file name, along with the option to delete the file if needed (Figure 60). Also if no System Validation errors are found, the user can select “Save and continue” to save their work and move on to Step 4, or Select “Save and exit” to save the information previously entered as well as the Excel Template, and return to the attestation later, from the Submissions Table on the GPCCA Dashboard.

**Figure 60 - Responsible Entity Excel Template Text (Tab delimited) (\*.txt) System Validation With No Errors Found**

**3 Enter Responsible Entity's details**

---

If you are submitting on behalf of more than one group health plan or more than one issuer, select Yes.

Yes  
 No

**Responsible Entity Details**

Complete and upload the **Responsible Entity Excel Template** for entities on whose behalf you are submitting the attestation. For detailed instructions, please select the "View detailed instructions" link and also refer to the GPCCA User Manual.  
[View detailed instructions](#)

**\* Upload entity list**  
 The entity list must be in text tab-delimited format.

<div style="display: flex; align-items: center;"> <span style="color: green; font-weight: bold; margin-right: 5px;">✓</span> <span style="border: 1px solid red; padding: 2px;">GPCCA-Responsibl... .txt</span> </div>	198 KB	05/10/2024 08:22 AM	<div style="border: 1px solid red; padding: 2px;"> <span style="color: gray;">🗑</span> Delete                 </div>
--	--------	---------------------	--

If the system detects any errors in your Responsible Entity Excel Template, you will need to first correct these errors before being allowed to complete the submission:

- Upload the Responsible Entity Text (Tab delimited) (\*.txt) file
- Errors found (Figure 61)
  - Note: The error list will tell the user the column in which the error occurs, what the error is, and in which cell the error occurs.*
- Select "View" to see the errors (Figure 62)
- Select "Print" to open the print window (Figure 62)
- Select "Save" to print, or save the Error list as a PDF (Figure 63)
- Select "Cancel" or "Close" the Error list on the Webform (Figure 62)
- Use the Error list that was printed or saved to make the necessary corrections to the Responsible Entity Excel Template that you previously saved and that was used to create the Text (Tab delimited) (\*.txt) file
- Repeat the steps in Section 11 for saving as an Excel Workbook (\*.xlsx) and Text (Tab delimited) (\*.txt) file
- Upload the new, corrected, Text (Tab delimited) (\*.txt) file
- Repeat this entire process as necessary until all System Validation errors are resolved.

**Figure 61 - Responsible Entity Excel Template Text (Tab delimited) (\*.txt) System Validation With Errors View, Button**

### 3 Enter Responsible Entity's details


If you are submitting on behalf of more than one group health plan or more than one issuer, select Yes.


Yes  
 No

#### Responsible Entity Details

Complete and upload the **Responsible Entity Excel Template** for entities on whose behalf you are submitting the attestation. For detailed instructions, please select the "View detailed instructions" link and also refer to the GPCCA User Manual.  
[View detailed instructions](#)

**\* Upload entity list**  
The entity list must be in text tab-delimited format.

  
Drag files here or [choose from folder](#)

 GPCCA-Responsibl... .txt      **3 errors found.** Review the errors, fix them, and upload a new file above. You cannot submit this data with these errors.      [× Clear](#)      [View](#)

**Figure 62 - Responsible Entity Excel Template Text (Tab delimited) (\*.txt) System Validation Errors Print Errors, Button**

**! Errors found in GPCCA-Responsible-Entity-Template\_Jun2024\_v6.txt** [Close](#)

There were 3 errors found in your uploaded file "GPCCA-Responsible-Entity-Template\_Jun2024\_v6.txt".

Use the table below to find and resolve the errors, then re-upload your file.

10 errors per page

Field name	Error description & resolution	Cell location in Excel
Entity Mailing Address	Value must not be blank.	3-G
Group Health Plan Number	Group health plan number is needed for ERISA plans and sponsors of ERISA plans.	4-D
Group Health EIN	Employer identification number must be a 9 digit, numeric value, with no special characters. Please remove any non-numeric characters.	5-B

[Print errors](#) [Cancel](#)

**Figure 63 - Responsible Entity Excel Template Text (Tab delimited) (\*.txt) System Validation Print Errors**

5/10/24, 8:43 AM
Validation error data for GPCCA-Responsible-Entity-Template\_Jun2024\_v6.txt

**! 3 errors found in GPCCA-Responsible-Entity-Template\_Jun2024\_v6.txt**

There were 3 errors found in your uploaded file "GPCCA-Responsible-Entity-Template\_Jun2024\_v6.txt".

Use the table below to find and resolve the errors, then re-upload your file.

Field name	Error description & resolution	Cell location in Excel
Entity Mailing Address	Value must not be blank.	3-G
Group Health Plan Number	Group health plan number is needed for ERISA plans and sponsors of ERISA plans.	4-D
Group Health EIN	Employer identification number must be a 9 digit, numeric value, with no special characters. Please remove any non-numeric characters.	5-B

Print 1 page

Destination Save as PDF

**Printer XYZ**

Pages Save as PDF

See more...

Layout Portrait

More settings ▼

Save
Cancel

<https://hiostest.cms.gov/HIOS-GPCCA-UI/protected/submission/create/6239> 1/1



## 16 - Group Health Plan and Health Insurance Issuer Attestation Statements

### **Table 1 - Group Health Plan and Health Insurance Issuer Attestation Statements**

*Note: These are the statements the Attester needs to read and attest to based on whether they are attesting for Group Health Plan, Health Insurance Issuer, or Both.*

Type of Entity	Statement
<p><b>Group health plans, including non-federal governmental plans, and health insurance issuers offering group health insurance coverage</b></p>	<p>I attest that, in accordance with section 9824(a)(1) of the Internal Revenue Code, section 724(a)(1) of the Employee Retirement Income Security Act, and section 2799A-9(a)(1) of the Public Health Service Act and the language herein, the group health plan(s) or health insurance issuer(s) offering group health insurance coverage on whose behalf I am signing has not, for the dates specified and as provided in the foregoing information, entered into an agreement with a health care provider, network or association of providers, third-party administrator, or other service provider offering access to a network of providers that would directly or indirectly restrict the group health plan(s) or health insurance issuer(s) from —</p> <ol style="list-style-type: none"> <li>1. Providing provider-specific cost or quality of care information or data, through a consumer engagement tool or any other means, to referring providers, the plan sponsor, participants, beneficiaries, or enrollees, or individuals eligible to become participants, beneficiaries, or enrollees of the plan or coverage;</li> <li>2. Electronically accessing de-identified claims and encounter information or data for each participant, beneficiary, or enrollee in the plan or coverage, upon request and consistent with the privacy regulations promulgated pursuant to section 264(c) of the Health Insurance Portability and Accountability Act of 1996 (HIPAA), the amendments made by the Genetic Information Nondiscrimination Act of 2008 (GINA), and the Americans with Disabilities Act of 1990 (ADA), including, on a per claim basis —             <ol style="list-style-type: none"> <li>a. Financial information, such as the allowed amount, or any other claim-related financial obligations included in the provider contract;</li> <li>b. Provider information, including name and clinical designation;</li> <li>c. Service codes; or</li> <li>d. Any other data element included in claim or encounter transactions; or</li> </ol> </li> <li>3. Sharing information or data described in items (1) or (2), or directing that such data be shared, with a business associate as defined in section 160.103 of title 45, Code of Federal Regulations (or successor regulations), consistent with the privacy regulations promulgated pursuant to section 264(c) of HIPAA, the amendments made by GINA, and the ADA.</li> </ol>

<b>Type of Entity</b>	<b>Statement</b>
<p><b>Health insurance issuers offering individual health insurance coverage</b></p>	<p>I attest that, in accordance with section 2799A-9(a)(2) of the Public Health Service Act and the language herein, the health insurance issuer(s) offering individual health insurance coverage on whose behalf I am signing has not, for the dates specified and as provided in the foregoing information, entered into an agreement with a health care provider, network or association of providers, or other service provider offering access to a network of providers that would directly or indirectly restrict the health insurance issuer(s) from —</p> <ol style="list-style-type: none"> <li>1. Providing provider-specific price or quality of care information, through a consumer engagement tool or any other means, to referring providers, enrollees, or individuals eligible to become enrollees of the plan or coverage; or</li> <li>2. Sharing, for plan design, plan administration, and plan, financial, legal, and quality improvement activities, data described in item (1) with a business associate as defined in section 160.103 of title 45, Code of Federal Regulations (or successor regulations), consistent with the privacy regulations promulgated pursuant to section 264(c) of Health Insurance Portability and Accountability Act of 1996 (HIPAA), the amendments made by the Genetic Information Nondiscrimination Act of 2008 (GINA), and the Americans with Disabilities Act of 1990 (ADA)</li> </ol>

## 17– Responsible Entity Excel Template Fields and Instructions

**Table 2 - Responsible Entity Excel Template data validations**

*Note: All fields marked with an asterisk (\*) are required fields.*

Column Heading	Instructions
<b>Name of the Responsible Entity*</b>	Enter the name of the Responsible Entity (i.e., the health insurance issuer or employer-sponsored group health plan), as applicable. Only one name should be included per row.
<b>Employer Identification Number (EIN)*</b>	Enter the Responsible Entity’s 9-digit EIN. Include leading zeros if the EIN is fewer than 9 digits. Do not use dashes. Ex: 001234567. Most Responsible Entities, including plans of state and local government agencies and non-profit organizations, have EINs. If you do not know the Responsible Entity’s EIN, you may be able to obtain this information from the Responsible Entity’s payroll or accounting department. If the Responsible Entity is a group health plan and the group health plan does not have its own EIN, enter the EIN for the plan sponsor.
<b>Plan Number</b>	For ERISA plans only, include the three-digit Plan Number that is included on the plan’s Form 5500. If the plan is not required to file a Form 5500 or the number is unknown, enter three zeros (000).
<b>Responsible Entity Type*</b>	Select from the drop-down menu or enter one of the following Responsible Entity types: ERISA plan, Church plan, (Non-Federal) governmental group health plan, Issuer/Insurer. If your plan is not a Church plan, governmental plan, or Issuer that sells insurance, it is likely an ERISA plan.
<b>Date Range for each Responsible Entity*</b>	Optional: If your attestation does not cover the entire period since the Responsible Entity's most recent attestation (or, in the case of a Responsible Entity that has not previously attested, the entire period since the later of December 27, 2020, or the date of the plan's establishment), you may enter the start and end dates for the period to which the attestation applies. The start and end dates can be in different years, as long as the end date is in the current attestation year.

<b>Column Heading</b>	<b>Instructions</b>
<b>Mailing Address for the Responsible Entity*</b>	Enter the complete mailing address where the Responsible Entity can receive correspondence related to the GCPCA.
<b>Point-of-Contact Name for Responsible Entity*</b>	Enter the first and last name of an individual who works for the Responsible Entity and can serve as a point-of-contact to respond to questions from the Departments regarding the GCPCA and the Responsible Entity's compliance with the prohibition on gag clauses.
<b>E-mail Address for Responsible Entity's Point-of-Contact*</b>	Enter the e-mail address of the Responsible Entity's point-of-contact.
<b>Phone Number for Responsible Entity's Point-of-Contact*</b>	Enter the 10-digit phone number, excluding spaces, dashes, or other punctuation, of the Responsible Entity's point-of-contact. Ex: 2025551989.

Column Heading	Instructions
<b>Attestation is for All Provider Agreements</b>	If you are attesting to compliance with the gag clause prohibition for all types of provider agreements (rather than only for specific types of provider agreements), place an Y in Column K for “Yes.”
<b>Attestation is only for some types of Provider Agreements: Medical, Pharmacy Benefits, Behavioral Health, Other</b>	If you are attesting only for a specific type(s) of provider or service agreement, mark a Y (for “Yes”) in the applicable column(s) (L-N) of the Responsible Entity Excel Template. If you are attesting for a specific type(s) of provider or service agreement other than medical, pharmacy benefit, or behavioral health, enter the provider agreement type(s) in column O, “Other.” If you are attesting for more than one provider agreement type in column O, separate each type with a semicolon. Do not use commas. If all four of these columns (L-O) are left blank, column K - “Attestation is for All Provider Agreements” - must be marked with an Y.

## 18 - Acronyms

The following are the acronyms used in this User Manual, either in the text or in the screenshots.

**Table 3 - Acronyms**

Acronym	Definition
ADA	Americans with Disabilities Act of 1990
BHM	Behavioral health manager
CAA	Consolidated Appropriations Act, 2021
CCIIO	Center for Consumer Information and Insurance Oversight
CMS	Centers for Medicare & Medicaid Services
the Departments	DOL, HHS, and the Treasury
DOL	Department of Labor
EIN	Employer Identification Number

Acronym	Definition
ERISA	Employee Retirement Income Security Act of 1974
GCPCA	Gag Clause Prohibition Compliance Attestation
GHP	Group Health Plan
GINA	Genetic Information Nondiscrimination Act of 2008
HIPAA	Health Insurance Portability and Accountability Act of 1996
HHS	Health and Human Services
PBM	Pharmacy Benefit Manager
PHS	Public Health Services
TPA	Third Party Administrator