*For instructions on using this template, please see Notes to Author/Template Instructions on page 16. Notes on accessibility: This template has been tested and is best accessible with JAWS 11.0 or higher. For questions about using this template, please contact* [*CMS IT Governance*](mailto:IT_Governance@cms.hhs.gov)*. To request changes to the template, please submit an* [*XLC Process Change Request*](https://www.cms.gov/Research-Statistics-Data-and-Systems/CMS-Information-Technology/XLC/Downloads/XLCProcessChangeRequestCR.docx) *(CR).*

|  | Centers for Medicare & Medicaid Services  CMS eXpedited Life Cycle (XLC) |
| --- | --- |

<Project Name / Acronym>

Risk Management Plan

Version X.X

MM/DD/YYYY

**Document Number:** <document’s configuration item control number>

**Contract Number:** <current contract number of company maintaining document>

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1. Introduction
   1. Overview

Instructions: Provide a high-level overview of the project. Focus on the process and deliverable aspects of the project, including contract type, major milestones, and stakeholders.

* 1. Purpose of the Risk Management Plan

Instructions: A risk is an event or condition that, if it occurs, could have a positive or negative effect on a project’s objectives. Risk Management is the process of identifying, assessing, responding to, monitoring and controlling, and reporting risks. This Risk Management Plan defines how risks associated with the <Project Name> project will be identified, analyzed, and managed. It outlines how risk management activities will be performed, recorded, and monitored throughout the lifecycle of the project and provides templates and practices for recording and prioritizing risks by the Risk Manager and/or Risk Management Team.

Risks related to IT systems or applications must be identified and documented based on the methodology in NIST SP 800-30, Risk Management Guide for Information Technology Systems. IT system or application weaknesses must be identified on an associated plan of action and milestones (POA&M) and tracked in accordance with HHS POA&M guidelines. Appropriate protective measures must be taken to safeguard sensitive IT system or application weaknesses or vulnerabilities from unauthorized disclosure.

1. Assumptions/Constraints/Risks
   1. Assumptions

Instructions: Describe any assumptions or dependencies regarding the project that impact this RMP.

* 1. Constraints

Instructions: Describe any limitations or constraints that have a significant impact on this RMP.

* 1. Risks

Instructions: Describe any risks associated with the content of this RMP and proposed mitigation strategies. Remember to include any identified risks in the project’s Risk Register or Report.

1. Risk Management Approach
   1. Process

*Instructions: Summarize the steps necessary for responding to project risk.*

The Project Manager working with the Project Team and Project Sponsors will ensure that risks are actively identified, analyzed, and managed throughout the life of the project. Risks will be identified as early as possible in the project so as to minimize their impact. The steps for accomplishing this are outlined in the following sections. The <Project Manager or other designee> will serve as the Risk Manager for this project.

A distinction may need to be made between overall project risk management and IT system or application risk management. Risks related to IT systems or applications must be identified and documented based on the methodology in NIST SP 800-30, Risk Management Guide for Information Technology Systems.

* 1. Roles and Responsibilities

Table 1: Roles and Responsibilities

| Role | Responsibilities |
| --- | --- |
| **Project Manager (PM)** | Accountable for RM planning and ensuring the process is implemented and followed. The PM will assign a Risk Manager/Coordinator to the project, and identify this individual on the project's organization chart. The PM will be involved in the initial risk identification, analysis, and risk response activities and then focus more on monitoring and control. |
| **Risk Manager/Coordinator** | Accountable to the PM and acts on the PM's behalf for managing and coordinating the RM activities on the project. This function may be performed by the PM based on the size and complexity of the project. |
| **Project Sponsor** | Responsible for realization of project benefits and should be involved in the RM process, especially at the start, when it is important to understand the challenges the project faces. The sponsor will be invited to risk activities at regularly scheduled intervals throughout the project lifecycle. |
| **Business SME (BSME)** | Assists in identifying and determining the context, consequence, impact, timing, and priority of the risk. |
| **Project Team** | Responsible for identifying and analyzing risks. Some team members will be assigned as Risk Owners and will be responsible for risk mitigation planning and tracking. |
| **Risk Owner** | Responsible for managing the risk assigned by the PM or Risk Manager/Coordinator. Their primary responsibility is to develop mitigation, contingency, and fallback plans, perform the steps of the mitigation plan and report progress to the Risk Manager/ Coordinator. The Risk Owner will ensure the documentation on the assigned risk(s) is accurate and obtain enough supporting information for analysis to ensure the risk(s) is/are understood and properly prioritized. |
| **Stakeholder** | Responsible for bringing unique perspectives to risk identification analysis, mitigation planning and staying involved in the risk tracking activities. They assist in identifying and determining the context, consequence, impact, timing, and priority of the risk. They will be invited to risk activities, as required, and risk owners will involve them in risk mitigation planning. |

* 1. Risk Identification

Risk Identification will involve the Project Team, appropriate Stakeholders, and will include an evaluation of environmental factors, organizational culture and the Project Management Plan (PMP) including the project scope, schedule, cost, or quality. Careful attention will be given to the project deliverables, assumptions, constraints, work breakdown structure (WBS), cost/effort estimates, resource plan, and other key project documents.

* + 1. Methods for Risk Identification

The following methods (discussed in the Standard Operating Procedure for Risk Management, Appendix B) may be used to assist in the identification of risks associated with <Project Name>:

* Brainstorming
* Structured Reviews
* Sticky Notes
* Affinity Diagrams
* Checklists
* Risk Breakdown Structure (RBS)
* Assumption and Constraint Analysis
* Taxonomies
* Expert Interviews
* Strengths, Weaknesses, Opportunities, Threats (SWOT) Analysis
* Lessons Learned
* Delphi Technique
* Etc.

A Risk Register will be generated and updated as needed and will be stored electronically in the project library located at <file location>.

* 1. Risk Analysis

All risks identified will be assessed to identify the range of possible project outcomes. Risks will be prioritized by their level of importance.

* + 1. Qualitative Risk Analysis

The probability and impact of occurrence for each identified risk will be assessed by the PM, with input from the Project Team using the following approach:

* Probability - is the likelihood that a risk will occur.
* Impact - is the consequence the risk will have on the project when it does occur.

Risks are evaluated against a standard impact/probability scale using a clearly defined range, as identified in Table 2 to decrease the ambiguity between different definitions of High, Moderate, and Low impact and results in a clearer picture of the High priority risks. Risks with High impacts and probabilities are those that need to be addressed first.

Table 2. Risk Exposure Rating

| **Risk Exposure Rating** | **Description** | **Color Code** |
| --- | --- | --- |
| **HIGH (H)** | Unacceptable. Major disruption likely; different approach required; priority management attention required. | **Red** |
| **MODERATE (M)** | Some disruption; different approach may be required; additional management attention may be needed. | **Yellow** |
| **LOW (L)** | Minimum impact; minimum oversight needed to ensure risk remains low. | **Green** |

**Probability**

*Instructions:* Enter the Probability of Occurrence Rating for each root cause using the specified criteria shown in Table 3, below. The PM must validate these definitions or modify them as necessary for their project*.*

Table 3: Probability of Occurrence Rating

| **Rating** | **Value Assigned** | **Probability of Occurrence** |
| --- | --- | --- |
| **Near Certainty** | **0.90** | **~90%** |
| **Highly Likely** | **0.70** | **~70%** |
| **Likely** | **0.50** | **~50%** |
| **Low Likelihood** | **0.30** | **~30%** |
| **Not Likely** | **0.10** | **~10%** |

**Impact**

*Instructions:* Impact of each risk is broken out into cost, schedule and performance (i.e., Program and Technical - requirements/quality) consequences. The ratings and types of Impact for each risk are established using criteria described in Table 4. This Impact scale may not be appropriate for all projects, and may need to be modified based on the situation.

Table 4: Rating and Types of Impact Criteria

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Rating** | **Value Assigned** | **Program Impact** | **Technical Impact** | **Cost Impact** | **Schedule Impact** |
| **Marginal** | **0.05** | Remedy will cause program disruption | Performance goals met, no impact on program success | Program budget not dependent on issue; no impact on program success; development or production cost goals not exceeded or dependent on this issue | Schedule not dependent on this issue; no impact on program success; development schedule goals not exceeded or not dependent on the issue |
| **Significant** | **0.10** | Shorts a significant mission need | Performance below goal, but within acceptable limits. No changes required, acceptable alternatives exist, minor impact on program success | Program budget impacted by < 1%; minor impact on program success; development or production cost goals exceeded by 1 - 5%; program management resources do not need to be used to implement workarounds | Non-critical path activities late; workarounds would avoid impact on key and non-key program milestones; minor impact on program success, development schedule goals exceeded by 1-5% |
| **Serious** | **0.20** | Shorts a critical mission need | Performance below goal, moderate changes required, alternative would provide acceptable system performance, limited impact on program success | Program budget impacted by 1 - 5%; limited impact on program success; development or production cost goals exceeded by 5 - 15%; program management reserves do not need to be used to implement workarounds | Critical path activities one month late; workarounds would not meet program milestones; program success in doubt; development schedule goals exceeded by 5-10% |
| **Very Serious** | **0.40** | Potentially fails key performance parameter | Performance unacceptable; significant changes required; possible alternatives may exist; program success in doubt | Program budget impacted by 5-10%; program success in doubt; development or production cost goals exceeded by 15-20%; program management reserves must be used to implement workarounds | Critical path activities one month late; workarounds would not meet program milestones; program success in doubt; development schedule goals exceed by 10 -15% |
| **Catastrophic** | **0.80** | Jeopardizes an exit criterion of current acquisition phase | Performance unacceptable; no viable alternatives exist; program success jeopardized | Program budget impacted by 10%; program success jeopardized; development or production cost goals exceeded by 20 - 25% | Key program milestones would be late by more than 2 months; program success jeopardized; development schedule goals exceeded by 20% |

Project root cause identification and analysis integrates the technical performance assessment, schedule assessment, and cost estimates using established risk evaluation techniques. Each of these risk categories (cost, schedule, and performance) has activities of primary responsibility, but is provided inputs and support from the other two risk categories. This helps to keep the process integrated and ensures the consistency of the final product.

Table 5, Risk Matrix, identifies the distribution of High (H) (red cells), Moderate (M) (yellow cells) and Low (L) (green cells) Risk Exposure Rating to be used when analyzing a risk. Projects shall use this Risk Matrix or tailor it to better fit the size and scope of specific projects or management practices of the organization. If the PM chooses to tailor the Risk Matrix, ISDDG shall be consulted.

Table 5: Risk Matrix

Risk Matrix

Risks that fall within the RED and YELLOW zones will have risk response plan which may include both a risk response strategy and a risk contingency plan.

* + 1. Quantitative Risk Analysis

Analysis of risk events that have been prioritized using the qualitative risk analysis process and their effect on project activities will be estimated, a numerical rating is applied to each risk based on quantitative analysis, and then documented in this section of the risk management plan.

* 1. Risk Mitigation Planning

Each major risk (those falling in the Red & Yellow zones) will be assigned to a Risk Owner for monitoring and controlling purposes to ensure that the risk will not “fall through the cracks”.

For each major risk, one of the following approaches will be selected to address it:

* **Risk Avoidance:** Make changes to the project plan to eliminate the risk or to protect the project objectives from its impact by eliminating the cause. An example is a change in scope, change in technical approach, or the addition of resources to avoid or eliminate the risk.
* **Risk Transference**: Transfer responsibility and ownership of the risk to an outside resource or organization. An example is contracting out a specialized technical component when the Project Team lacks the skills.
* **Risk Acceptance:**  Acknowledge the existence of the risk and accept its consequences if it occurs. An example is the acceptance of schedule or cost overrun and developing a contingency plan to execute if the risk occurs.
* **Risk Mitigation (Controlling):**  Incorporate the ongoing monitoring and handling of risks throughout the life of the project to reduce the impact or probability of the risk. These mechanisms involve the use of reviews, possibly adding milestones, and development of counter measures and cost estimates. Introducing new processes or procedures to lessen the probability of producing a product that will not work or will not be accepted by users is a good example of risk mitigation.

When looking to exploit opportunities identified during the risk process the strategies include:

* **Exploitation of opportunities -** Increase the opportunity by making the cause more probable.
* **Enhancement of opportunities -** Increase the expected time savings, technical - solution, quality or cost savings by increasing the probability or impact of its occurrence
* **Acceptance of opportunities** **-** accept the good fortune
* **Sharing of opportunities -** keep the opportunities - don't transfer them elsewhere.

For each risk that will be mitigated, the Project Team will identify ways to prevent the risk from occurring or reduce its impact or probability of occurring. This may include prototyping, adding tasks to the project schedule, adding resources, etc. Any secondary risks that result from risk mitigation response will be documented and follow the risk management protocol as the primary risks.

For each major risk that is to be mitigated or that is accepted, a course of action will be outlined in the event that the risk does materialize in order to minimize its impact.

* 1. Risk Tracking

The level of risk on a project will be tracked, monitored and controlled and reported throughout the project lifecycle.

*Instructions: Describe the methods and metrics that will be used to track the project’s risk status throughout the lifecycle as well as how this status will be reported to the stakeholders/ management.*

Risks will be assigned a Risk Owner(s) who will track, monitor and control and report on the status and effectiveness of each risk response action to the PM and Project Team on a <insert timeframe>.

A “Top 10 Risk List” will be maintained by the PM, Risk Manager or Project Team and will be reported as a component of the Project Status Reporting Process for this Project.

All project change requests will be analyzed for their possible impact to the project risks.

As risk events occur, the list will be re-prioritized during weekly reviews and the RMP will reflect any and all changes to the risk lists including secondary and residual risks.

Management will be notified of important changes to risk status as a component to the Executive Project Status Report. *Instructions: State timeframe, i.e., every two weeks*

The PM or Risk Manager will:

* Review, reevaluate, and modify the probability and impact for each risk item *Instructions: insert timeframe, as needed, every two weeks, etc.*
* Analyze any new risks that are identified and add these items to the risk register (Another example is a risk database).
* Monitor and control risks that have been identified
* Review and update the top ten risk list  
  *Instructions: timeframe, as needed, every two weeks, etc.*
* Escalate issues/ problems to management  
  *Instructions: List factors here that would need to be escalated to management. Examples: documented mitigation actions are not effective or producing the desired results; the overall level of risk is rising.*

The Risk Owner will:

* Help develop the risk response and risk trigger and carry out the execution of the risk response, if a risk event occurs.
* Participate in the review, re-evaluation, and modification of the probability and impact for each risk item on a weekly basis.
* Identify and participate in the analysis of any new risks that occur.
* Escalate issues/problems to PM that,
* Significantly impact the projects triple constraint or trigger another risk event to occur.
* Require action prior to the next weekly review
* Risk strategy is not effective or productive causing the need to execute the contingency plan.

Risk activities will be recorded in the <give Document Name> Risk Register located on the <give full network path location>.

* 1. Risk Contingency Budgeting

A risk contingency budget can be established to prepare in advance for the possibility that some risks will not be managed successfully. The risk contingency budget will contain funds that can be tapped so that your project doesn't go over budget.

There is a total of given dollar amount in the given project name’s project budget allocated for Risk Management activities. These activities may include, but are not limited to, identifying, analyzing, tracking, controlling, managing, and planning for risks. This also includes creating and updating the risk response strategies and contingency plans.

1. Tools and Practices

A Risk Register will be maintained by the PM and will be reviewed as a standing agenda item for Project Team meetings.

Risk activities will be recorded in the <give Document Name> Risk Register located on the <give full network path location>.

1. Closing a Risk

A risk will be considered closed when it meets the following criteria:

* *<List the criteria when a risk can be closed>*
* *<Who has the authority to close a risk? >*

Examples:

* Risk is no longer valid
* Risk Event has occurred
* Risk is no longer considered a risk
* Risk closure at the direction of the PM

1. Lessons Learned

The lessons learned will be captured and recorded in the given Document Name/ Risk Database Name/Lessons Learned document or folder located on a given full network path location.

1. Process Improvement

*Instructions: Define mechanisms that will be used to plan for process improvement based on risk management activities. If appropriate, refer to the project’s Software Process Improvement Plan documented in the PMP or in a separate subordinate control plan document.*

1. Initial Risk Register

*Instructions: An initial Risk Register may be included in this section if appropriate. If a preliminary Risk Register has not been produced, this section may be omitted.*

A template for a Risk Register is also available from the CMS Expedited Life Cycle (XLC) website located at: <http://www.cms.gov/Research-Statistics-Data-and-Systems/CMS-Information-Technology/XLC/Downloads/RiskRegister.xlsx>.

1. Record of Changes

*Instructions: Provide information on how the development and distribution of the Risk Management Plan will be controlled and tracked. Use the table below to provide the version number, the date of the version, the author/owner of the version, and a brief description of the reason for creating the revised version.*

Table 1: Record of Changes

| Version  Number | Date | Author/Owner | Description of Change |
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1. Acronyms

Instructions: Provide a list of acronyms and associated literal translations used within the document. List the acronyms in alphabetical order using a tabular format as depicted below.

Table 2: Acronyms

| Acronym | Literal Translation |
| --- | --- |
| **CMS** | Centers for Medicare & Medicaid Services |
| **IS RA** | Information Security Risk Assessment |
| **PMP** | Project Management Plan |
| **PPA** | Project Process Agreement |
| **RMP** | Risk Management Plan |
| **SDMP** | System Development Management Plan |
|  |  |
|  |  |

1. Glossary

Instructions: Provide clear and concise definitions for terms used in this document that may be unfamiliar to readers of the document. Terms are to be listed in alphabetical order.

Table 3: Glossary

| Term | Definition |
| --- | --- |
| Contingency Plan | Planned activities that will occur when or if a risk materializes. |
| Contingency Plan Trigger | An event or an occurrence or sequence of events that activate the execution of prescribed contingency plans associated with a given risk. |
| Mitigate | To eliminate or lessen the likelihood and/or consequence of a risk. |
| Opportunity | Risk with positive benefits. |
| Risk | An uncertain event or condition that, if it occurs, has a positive or negative impact on a project’s objectives such as time, cost, scope, quality, etc. |
| Risk Acceptance | An informed and deliberate decision to accept consequences and the likelihood of a particular risk. |
| **Risk Analysis** | Process by which risks are examined in further detail to determine the extent of the risks, how they relate to each other, and which ones are the highest risks. |
| **Risk Assessment** | Identification and analysis of identified risks to ensure an understanding of each risk in terms of probability and consequences. |
| **Risk Assumption** | Any assumptions pertaining to the risk itself. |
| **Risk Avoidance** | Plans or methods utilized to eliminate or avoid as much risk as possible. |
| **Risk Category (Classification)** | A method of categorizing the various risks on the project to allow grouping for various analysis techniques. |
| **Risk Exposure** | A standard quantitative measure of risk used to compare risks with one another; derived by multiplying the Risk Impact by the Risk Probability. |
| **Risk Identification** | An organized and planned approach to seek out probable, possible, or realistic risks to a project or other endeavor. |
| **Risk Impact** | A numeric estimate to quantify the degree to which a risk’s occurrence will impact a project’s outcome; used to calculate Risk Exposure (Risk Exposure = Risk Probability times Risk Impact). |
| **Risk Magnitude** | A high grouping such as “High”, “Moderate” or “Low” used to organize calculated Risk Exposure values. |
| **Risk Mitigation Plan** | Planned activities to prevent a risk’s occurrence and/or to reduce the probability and/or consequence of a risk. |
| **Risk Monitoring and Tracking** | Process of systematically watching over time the evolution of the identified risks, and evaluating the effectiveness of risk strategies against established metrics. |
| **Risk Owner** | The individual responsible for managing a specified risk and ensuring effective treatment plans are developed and implemented. |
| **Risk Probability** | Likelihood of a risk occurring, expressed as a qualitative and/or quantitative metric; used in the calculation of Risk Exposure (Risk Exposure = Risk Probability times Risk Impact). |
| **Risk Rank** | See Risk Exposure. |
| **Risk Source** | Underlying circumstances and/or factors that lead to the existence of a risk. |
| **Risk Threshold** | Defined or agreed level of acceptable risk that risk handling strategies are expected to meet. |
| **Risk Transfer** | Movement of the risk ownership to another organizational element. |
| **Threat** | Risk with negative consequences. |

1. Referenced Documents

Instructions: Summarize the relationship of this document to other relevant documents. Provide identifying information for all documents used to arrive at and/or referenced within this document (e.g., related and/or companion documents, prerequisite documents, relevant technical documentation, etc.).

Table 4: Referenced Documents

| Document Name | Document Location and/or URL | Issuance Date |
| --- | --- | --- |
|  |  |  |
|  |  |  |
|  |  |  |

1. Approvals

The undersigned acknowledge that they have reviewed the Risk Management Plan and agree with the information presented within this document. Changes to this Risk Management Planwill be coordinated with, and approved by, the undersigned, or their designated representatives.

*Instructions: List the individuals whose signatures are desired. Examples of such individuals are Business Owner, Project Manager (if identified), and any appropriate stakeholders. Add additional lines for signature as necessary.*

|  |  |  |  |
| --- | --- | --- | --- |
| Signature: |  | Date: |  |
| Print Name: |  |  |  |
| Title: |  |  |  |
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| Print Name: |  |  |  |
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1. Notes to the Author / Template Instructions

This document is a template for creating a Risk Management Plan for a given investment or project. The final document should be delivered in an electronically searchable format. The Risk Management Plan should stand on its own with all elements explained and acronyms spelled out for reader/reviewers, including reviewers outside CMS who may not be familiar with CMS projects and investments.

This template includes instructions, boilerplate text, and fields. The developer should note that:

* *Each section provides instructions or describes the intent, assumptions, and context for content included in that section. Instructional text appears in blue italicized font throughout this template.*
* *Instructional text in each section should be replaced with information specific to the particular investment.*
* *Some text and tables are provided as boilerplate examples of wording and formats that may be used or modified as appropriate.*

When using this template, follow these steps:

1. *Table captions and descriptions are to be placed centered, above the table.*
2. *Modify any boilerplate text, as appropriate, to your specific investment.*
3. *Do not delete any headings. If the heading is not applicable to the investment, enter “Not Applicable” under the heading.*
4. *All documents must be compliant with Section 508 requirements.*
5. *Figure captions and descriptions are to be placed centered, below the figure. All figures must have an associated tag providing appropriate alternative text for Section 508 compliance.*
6. *Delete this “Notes to the Author / Template Instructions” page and all instructions to the author before finalizing the initial draft of the document.*
7. XLC Template Revision History

The following table records information regarding changes made to the XLC template over time. This table is for use by the XLC Steering Committee only. To provide information about the controlling and tracking of this artifact, please refer to the Record of Changes section of this document.

Table 5: XLC Template Revision History

| Version  Number | Date | Author/Owner | Description of Change |
| --- | --- | --- | --- |
| 1.0 | 11/12/2008 | ESD Deliverables Workgroup | Baseline version. |
| 2.0 | 08/14/2014 | Celia Shaunessy, XLC Steering Committee | Changes made per [CR 14-012](https://share.cms.gov/office/ois/Services/XLCSC/XLCDocs/14-012_GeneralUpdates.docx). |
| 2.1 | 02/02/2015 | Surya Potu,  CMS/OEI/DPPIG | Updated CMS logo. |

1. Additional Appendices

Instructions: Utilize additional appendices to facilitate ease of use and maintenance of the document.