

**PREDECISIONAL
BEING PROVIDED TO SUPPORT THE 3/9/2017 ACRS REGULATORY
POLICIES AND PRACTICES FULL COMMITTEE MEETING
AND NOT TO SOLICIT EXTERNAL STAKEHOLDER FEEDBACK**

APPENDIX J: BACKFITTING COST-BENEFIT ANALYSIS PROCEDURES

Draft Outline

1. Introduction
2. Discussion
 - a. Backfit Determination
 - b. Justification for Imposing Backfits
 - i. Basic Backfit Justification (Backfit Rule)
 - ii. Regulatory Analysis (Staff Procedures)
 - iii. Further Justification (Staff Procedures)
 - c. Staff Process for Identifying and Imposing Generic Backfits
3. Questions and Answers on Backfitting
 - a. Backfit Determination and Imposition
 - b. Generic Backfits
 - c. Facility-Specific Backfits
 - d. Backfit Analysis
 - e. Appeals
 - f. General Questions
4. References