

Migration from EDE to ARC-AMPE Program Management (PM) controls

CMS requirements for Direct Enrollment Entities

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Purpose

This white paper provides a guide for Direct Enrollment Entities (DEEs) to upgrade their Enhanced Direct Enrollment (EDE) System Security and Privacy Plans (SSPPs) to the Acceptable Risk Controls for ACA, Medicaid, and Provider Entities (ARC-AMPE).

Due to the substantial number of controls, and to facilitate ease of use, this white paper is one of a series of 20 which divides the ARC-AMPE by control family. This white paper addresses the Program Management controls.

ARC-AMPE Control Families	
Control Family	Number of Controls
Access Control	46
Awareness and Training	9
Audit and Accountability	18
Assessment, Authorization, and Monitoring	12
Configuration Management	25
Contingency Planning	16
Identification and Authentication	21
Incident Response	15
Maintenance	12
Media Protection	8
Physical and Environmental Protection	9
Planning	6
Program Management (This Document)	5
Personnel Security	8
Personally Identifiable Information Processing and Transparency	10
Risk Assessment	8
System and Services Acquisition	18
System and Communications Protection	28
System and Information Integrity	30
Supply Chain Risk Management	4

Background

Affordable Care Act

The Affordable Care Act (ACA) revolutionized access to healthcare in the United States by establishing Health Insurance Marketplaces (HIMs). Enhanced Direct Enrollment (EDE) is an ACA innovation that allows third-party entities, such as insurers and web-brokers, to offer consumers a seamless application and enrollment experience directly through their platforms. This approach improves accessibility to the marketplace while maintaining compliance with federal regulations.

Enhanced Direct Enrollment

Direct Enrollment (DE) is a service that allows approved Qualified Health Plan (QHP) issuers and third-party web-brokers (online insurance sellers) to enroll consumers in Exchange coverage, with or without the assistance of an agent/broker, directly from their websites.

The Enhanced Direct Enrollment (EDE) user experience goes well beyond the plan shopping and enrollment experience that is available via Classic DE. EDE is a service that allows approved EDE entities (e.g., QHP issuers and web-brokers approved to participate in EDE) to provide a comprehensive consumer experience including the eligibility application, Exchange enrollment, and post-enrollment year-round customer service capabilities for consumers and agents/brokers working on behalf of consumers, directly on issuer and web-broker websites. Through EDE, approved EDE Entities build and host a version of the HealthCare.gov eligibility application directly on their websites that securely integrates with a back-end suite of Federally Facilitated Exchanges (FEEs) application programming interfaces (APIs) to support application, enrollment and more.

Source: [cms.gov](https://www.cms.gov)

CMS oversight

The Centers for Medicare & Medicaid Services (CMS) exercises oversight of DEEs, which are responsible for overseeing and managing marketplace operations to ensure compliance with federal regulations, safeguard consumer data, and maintain the integrity of the HIM. Key aspects of CMS's oversight include:

- Requiring DEEs to undergo rigorous audit processes, including demonstrating compliance with security and privacy control requirements.
- Enforcing strict data protection measures in the DE environment to ensure the confidentiality, integrity, and availability of consumer data and requiring entities to implement cybersecurity controls, conduct regular risk assessments, and submit independent security audits.
- Requiring DEEs to adhere to operational policies and procedures, such as providing accurate plan information, maintaining transparent consumer interactions, and facilitating HIM enrollment without bias.
- Requiring DEEs to report any data breaches or system incidents promptly and to take corrective actions as directed by CMS and the U.S. Department of Health and Human Services (HHS) Office for Civil Rights (OCR).
- Requiring DEEs to renew their Authority to Connect (ATC) annually, providing updated documentation and evidence of continued compliance with all requirements.

Through these oversight mechanisms, CMS ensures that DEEs in the healthcare.gov environment deliver secure, compliant, and user-friendly services, aligning with the ACA's mission to expand access to quality health coverage.

ARC-AMPE

CMS published the ARC-AMPE for Direct Enrollment Entities (DEEs) Version 1.0 dated July 7th, 2025. This framework replaces the EDE security and privacy guidelines:

- ARC-AMPE Volume 1 contains high-level guidance, and Volume 2 has the minimum-level security and privacy controls.
- ARC-AMPE Volume 2 is the new format for the SSPP for DEEs.
- The compliance date for DEEs is June 2026.

The minimum control baseline for ARC-AMPE DEE compliance consists of 308 controls which have been derived from the National Institute of Standards and Technology (NIST) Special Publication (SP) 800-53 Revision 5, “Security and Privacy Controls for Information Systems and Organizations.”

The number of controls required for the mandatory baseline represents a significant increase from the EDE baseline (295 controls), and DEEs should be prepared for an increased level of effort for developing the SSPP and submitting more artifacts during audits.

Another major change is the format of the SSPP template. EDE used a Microsoft Word format whereas ARC-AMPE is an Excel spreadsheet.

Control mapping

The mapping of the controls found in the EDE audit baseline (based on NIST SP 800-53 Revision 4) to their new locations in ARC-AMPE (based on NIST SP 800-53 Revision 5) are included in the table below. The table lists the EDE control directly compared with the ARC-AMPE equivalent control name, as applicable. The table also documents any new ARC-AMPE controls that do not have EDE equivalents, as well as those controls that have been combined or withdrawn for ARC-AMPE.

Note also that all references to NIST SP 800-53 Revision 5 included below are based on version 5.1.1, which was issued on November 7, 2023.

Program Management (PM)

The set of controls in this family complement the security controls in the foregoing 19 security control families by focusing on the organization-wide information security requirements that are essential for managing information security programs.

EDE		ARC-AMPE	
Control	N/A	Control	Plan of Action and Milestones Process
Program Management controls were not part of the EDE required baseline.		PM-04: Plan of Action and Milestones Process <ul style="list-style-type: none"> a. Implement a process to ensure that Plans of Action and Milestones (POA&M) for the information security, privacy, and supply chain risk management programs and associated organizational systems: <ol style="list-style-type: none"> 1. Are developed and maintained; 2. Document the remedial information security, privacy, and supply chain risk management actions to adequately respond to risk to organizational operations and assets, individuals, other organizations, and the Nation; and 3. Are reported in accordance with established reporting requirements. b. Review POA&Ms for consistency with the organizational risk management strategy and organization-wide priorities for risk response actions. 	
Control	N/A	Control	System Inventory
Program Management controls were not part of the EDE required baseline.		PM-05: System Inventory Develop and update an inventory of the organizational systems at least every one (1) year or when there is a significant change to the inventory.	
Control	N/A	Control	Inventory of Personally Identifiable Information
Program Management controls were not part of the EDE required baseline.		PM-05(01): Inventory of Personally Identifiable Information Establish, maintain, and update an inventory of all systems, applications, and projects that process Personally Identifiable Information (PII) continuously or when there is a significant change to the systems, applications, and projects that process PII.	

EDE		ARC-AMPE	
Control	N/A	Control	Accounting of Disclosures
Program Management controls were not part of the EDE required baseline.		PM-21: Accounting of Disclosures <ul style="list-style-type: none"> a. Develop and maintain an accurate accounting of disclosures of Personally Identifiable Information (PII), including: <ul style="list-style-type: none"> 1. Date, nature, and purpose of each disclosure; and 2. Name and address, or other contact information of the individual or organization to which the disclosure was made; b. Retain the accounting of disclosures for the length of the time the PII is maintained or five (5) years after the disclosure is made, whichever is longer; and c. Make the accounting of disclosures available to the individual to whom the PII relates upon request. 	
Control	N/A	Control	Minimization of PII Used in Testing, Training, and Research
Program Management controls were not part of the EDE required baseline.		PM-25: Minimization of PII Used in Testing, Training, and Research <ul style="list-style-type: none"> a. Develop, document, and implement policies and procedures that address the use of Personally Identifiable Information (PII) for internal testing, training, and research; b. Limit or minimize the amount of PII used for internal testing, training, and research purposes; c. Authorize the use of PII when such information is required for internal testing, training, and research; and d. Review and update policies and procedures at least every one (1) year. 	

References

NIST SP 800-53 Revision 5.1.1

NIST SP 800-53 Revision 4

CMS Standards

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With a meticulous eye for detail and a strategic mindset, Ian excels in developing tailored solutions to ensure compliance and mitigate risks within complex organizational environments. His expertise extends to leading audits and risk assessments, as well as providing advisory for driving continuous improvement initiatives to enhance cybersecurity posture and operational resilience.

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