

Migration from EDE to ARC-AMPE Supply Chain Risk Management (SR) controls

CMS requirements for Direct Enrollment Entities

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Table of contents

Purpose.....2

Background3

 Affordable Care Act3

 Enhanced Direct Enrollment3

 CMS oversight.....3

 ARC-AMPE.....4

Control mapping.....4

 Supply Chain Risk Management (SR)5

References7

Legal disclaimer8

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 Supply Chain Risk 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	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 (This Document)	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.

Supply Chain Risk Management (SR)

The set of controls in this family focuses on helping organizations identify, assess, and mitigate risks associated with suppliers, contractors, service providers, and other external parties involved in the development, delivery, or operation of Information and Communication Technology, and Operational Technology (ICT/OT) products and services.

EDE		ARC-AMPE	
Control	N/A	Control	SCRM Policy and Procedures
New NIST SP 800-53 Rev.5 Control and applicable to ARC-AMPE.		SR-01 Policy and Procedures <ol style="list-style-type: none"> Develop, document, and disseminate to organization-defined personnel and roles: <ol style="list-style-type: none"> Organization-level supply chain risk management policy that: <ol style="list-style-type: none"> Addresses purpose, scope, roles, responsibilities, management commitment, coordination among organizational entities, and compliance; and Is consistent with applicable laws, Executive Orders, directives, regulations, policies, standards, and guidelines; and Procedures to facilitate the implementation of the supply chain risk management policy and the associated supply chain risk management controls; Designate organization-defined officials to manage the development, documentation, and dissemination of the supply chain risk management policy and procedures; and Review and update the current supply chain risk management: <ol style="list-style-type: none"> Policy at least every one (1) year and following organization-defined events; and Procedures at least every one (1) year and following organization-defined events. 	
Control	N/A	Control	Supply Chain Risk Management Plan
New NIST SP 800-53 Rev.5 Control and applicable to ARC-AMPE.		SR-02 Supply Chain Risk Management Plan <ol style="list-style-type: none"> Develop a plan for managing supply chain risks associated with the research and development, design, manufacturing, acquisition, delivery, integration, operations and maintenance, and disposal of the organization-defined systems, system components, or system services. Review and update the supply chain risk management plan at least every one (1) year or as required, to address threat, organizational, or environmental changes; and Protect the supply chain risk management plan from unauthorized disclosure and modification. 	
Control	N/A	Control	Establish SCRM Team
New NIST 800-53 Rev.5 Control and applicable to ARC-AMPE.		SR-02(01) Establish SCRM Team Establish a supply chain risk management team consisting of organization-defined personnel, roles, and responsibilities to lead and support organization-defined supply chain risk management activities.	

EDE		ARC-AMPE	
Control	N/A	Control	Supply Chain Controls and Processes
<ul style="list-style-type: none">• New NIST 800-53 Rev.5 Control and applicable to ARC-AMPE.• Withdrawn controls SA-12(3) and SA-12(15).		SR-03 Supply Chain Controls and Processes <ul style="list-style-type: none">a. Establish a process or processes to identify and address weaknesses or deficiencies in the supply chain elements and processes of organization-defined system or system component in coordination with organization-defined supply chain personnel;b. Employ the organization-defined supply chain controls to protect against supply chain risks to the system, system component, or system service and to limit the harm or consequences from supply chain-related events;c. Document the selected and implemented supply chain processes and controls in applicable security and privacy plans, the supply chain risk management plan, and any other organization-defined document.	

References

NIST SP 800-53 Revision 5.1.1

NIST SP 800-53 Revision 4

CMS Standards

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