



OFFICE OF INFORMATION SERVICES

DATE: SEP 3 2013
TO: Director,
Consortium for Medicare Health Plans Operations (OA/CMHPO) and Acting
Deputy Center Director for Operations, Center for Consumer Information and
Insurance Oversight (CCIIO)
FROM: Chief Information Officer and
Director, Office of Information Services (OIS)
SUBJECT: Authorization Decision for the Federal Facilitated Marketplaces (FFM) System

ACTION REQUIRED 30 DAYS FROM THE DATE OF THIS MEMORANDUM

The Federal Facilitated Marketplaces (FFM) System is a *Moderate* level system located at the Terremark Datacenter in Culpeper, Virginia. The system maintains records used to support all Health Insurance Exchange Programs established by the Centers for Medicare & Medicaid Services (CMS) under the health care reform provisions of the Affordable Care Act (Public Law 11-148). FFM will help qualified individuals and small business employers shop for, select, and pay for high-quality, affordable health coverage. Exchanges will have the capability to determine eligibility for coverage through the Exchange, for tax credits and cost-sharing reductions, and for Medicaid, Basic Health Plan (BHP) and Children's Health Insurance Program (CHIP) coverage. As part of the eligibility and enrollment process, financial, demographic, and (potentially) health information will flow through the Exchange.

On August 8, 2013, you certified the controls for the system and submitted along with your certification the other required documentation necessary to obtain an Authorization to Operate (ATO) for FFM.

I have determined through a thorough review of the authorization package that the risk to CMS information and information systems resulting from the operation of the FFM information system is acceptable predicated on the completion of the actions described in the attachment. Accordingly, I am issuing an Authorization to Operate (ATO) for the FFM information system to operate in its current environment and configuration until August 31, 2014. The current configuration includes only the Federal Facilitated Marketplaces Qualified Health Plans (QHP) and Dental modules. This system is not authorized to establish any new connections or interfaces with non-CMS FISMA or other non-CMS connections without prior approval during the period of this ATO. An impact analysis must be conducted for any system changes implemented after the issuance of this ATO. Any major modifications that affect the security posture of the system will require an appropriately scoped security controls assessment and issuance of a new ATO.

The security authorization of the information system will remain in effect until the indicated expiration date if the following conditions are maintained:

- (i) Required periodic security status reports for the system are submitted to this office in accordance with current CMS policy;
- (ii) New vulnerabilities reported during the continuous monitoring process do not result in additional agency-level risk that is deemed unacceptable; and
- (iii) The system has not exceeded the maximum allowable time between security authorizations in accordance with Federal or CMS policy.

The attachment provides information on requirements not met, as well as corrective actions needed to bring them into compliance. The actions set forth in the attachment must be entered into the approved CMS Plan of Action and Milestones (POA&M) tracking tool no later than 30 days from the date of this memorandum, and the action items addressed no later than the designated completion dates. This office will monitor all POA&M items submitted during the period of authorization.

If you have questions, please contact Teresa Fryer, Chief Information Security Officer (CISO), at [REDACTED]. The DISPC team is also available to support staff level questions at [REDACTED].

[REDACTED]
Tony Trenkle

Attachment

cc:

Mark Oh, Director OIS/CIISG/DHIM
Darrin Lyles, ISSO, OIS/CIISG/DSMDS
Teresa Fryer, CISO, Director OIS/EISG
Michael Mellor, Dep. CISO, Dep. Director OIS/EISG
Desmond Young, OIS/EISG/DISPC
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James Mensah, OIS/EISG/DISPC