CMS Manual System	Department of Health & Human Services (DHHS)
Pub 100-20 One-Time Notification	Centers for Medicare & Medicaid Services (CMS)
Transmittal 1548	**Date: October 30, 2015**
	Change Request 9309

SUBJECT: Analysis Only: To Obtain the Level of Effort (LOE) from Medicare Administrative Contractors (MACs) to Implement Multifactor Authentication (MFA) as an Option for Non-Organization Users and to also Obtain the Level of Effort (LOE) from Medicare Administrative Contractors (MACs) to Implement Multifactor Authentication (MFA) as a Requirement for Non-Organization Users

I. SUMMARY OF CHANGES: This Change request (CR) instructing the MACs to provide a Level of effort (LOE) for the implementation of Acceptable Risk Safeguards(ARS) control IA-8 for the MACs Provider Portal as an Option and instructing the MACs to provide a Level of effort (LOE) for the implementation of Acceptable Risk Safeguards(ARS) control IA-8 for the MACs Provider Portal as a Requirement.

EFFECTIVE DATE: December 2, 2015
Unless otherwise specified, the effective date is the date of service.
IMPLEMENTATION DATE: December 2, 2015

Disclaimer for manual changes only: The revision date and transmittal number apply only to red italicized material. Any other material was previously published and remains unchanged. However, if this revision contains a table of contents, you will receive the new/revised information only, and not the entire table of contents.

II. CHANGES IN MANUAL INSTRUCTIONS: (N/A if manual is not updated)
R=REVISED, N=NEW, D=DELETED-*Only One Per Row.*

R/N/D	CHAPTER / SECTION / SUBSECTION / TITLE
N/A	N/A

III. FUNDING:
For Medicare Administrative Contractors (MACs):
The Medicare Administrative Contractor is hereby advised that this constitutes technical direction as defined in your contract. CMS does not construe this as a change to the MAC Statement of Work. The contractor is not obligated to incur costs in excess of the amounts allotted in your contract unless and until specifically authorized by the Contracting Officer. If the contractor considers anything provided, as described above, to be outside the current scope of work, the contractor shall withhold performance on the part(s) in question and immediately notify the Contracting Officer, in writing or by e-mail, and request formal directions regarding continued performance requirements.

IV. ATTACHMENTS:

One Time Notification

Attachment - One-Time Notification

Pub. 100-20	Transmittal: 1548	Date: October 30, 2015	Change Request: 9309

SUBJECT: Analysis Only: To Obtain the Level of Effort (LOE) from Medicare Administrative Contractors (MACs) to Implement Multifactor Authentication (MFA) as an Option for Non-Organization Users and to also Obtain the Level of Effort (LOE) from Medicare Administrative Contractors (MACs) to Implement Multifactor Authentication (MFA) as a Requirement for Non-Organization Users

EFFECTIVE DATE: December 2, 2015

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I.   GENERAL INFORMATION

A.   Background: Analysis Only: In light of the recent Chief Information Officer (CIO) Policy Directive #15-01, MACs shall implement multifactor authentication (MFA) as an option for Non-Organization users. This is an analysis only Change Request (CR) instructing the MACs to provide a Level of effort (LOE) for the implementation of Acceptable Risk Safeguards (ARS) control IA-8 for the MAC's Provider Portal as an Option and instructing also the MACs to provide a Level of effort (LOE) for the implementation of Acceptable Risk Safeguards (ARS) control IA-8 for the MAC's Provider Portal as a Requirement.

B.   Policy: Compliance with the Federal Information Security Management Act of 2002, National Institute of Standards and Technology (NIST) requirements and guidance, and CMS policies, standards, guidelines and procedures.

II.   BUSINESS REQUIREMENTS TABLE

"Shall" denotes a mandatory requirement, and "should" denotes an optional requirement.

Number	Requirement	A/B MAC			DME MAC	Shared-System Maintainers				Other
		A	B	HHH		FISS	MCS	VMS	CWF	
9309.1	The MAC shall provide to CMS the estimated Level Of Effort (LOE) required in order to meet the requirements of *CMS Minimum Security Requirements (*CMSR) IA-8. While IA-8 requires the use of Multifactor Authentication (MFA), the newly released Chief Information Officer (CIO) Directive (15-01) directs that for public facing systems the functionality shall be available, but the use of MFA is determined by the end user (e.g., Provider, Consumer, etc.). JA, JB, JD, JE, JF, JK, J5, J6, J8, JJ, JM, and J15. Note: LOE should include efforts for updating	X	X	X	X						

Number	Requirement	Responsibility								
		A/B MAC			D M E M A C	Shared-System Maintainers				Other
		A	B	H H H		F I S S	M C S	V M S	C W F	
	documentation such as user guides and provider communication/training.									
9309.2	For MACs that are currently utilizing the Enterprise Identity Management (EIDM) system for authentication purposes, those MACs shall provide CMS with the LOE required to implement the MAC's own optional MFA solution, rather than utilizing EIDM. JN, JH, JL, and JC. Note: LOE should include efforts for updating documentation such as user guides and provider communication/training.	X	X		X					
9309.3	The MAC shall provide to CMS the estimated Level Of Effort (LOE) required in order to meet the requirements of *CMS Minimum Security Requirements (*CMSR) IA-8 to require the end user to use MFA (e.g., Provider, Consumer, etc.). JA, JB, JD, JE, JF, JK, J5, J6, J8, JJ, JM, and J15. Note: LOE should include efforts for updating documentation such as user guides and provider communication/training.	X	X	X	X					
9309.4	For MACs that are currently utilizing the Enterprise Identity Management (EIDM) system for authentication purposes, those MACs shall provide CMS with the LOE required to implement the MAC's own required MFA solution rather than utilizing EIDM. JN, JH, JL, and JC. Note: LOE should include efforts for updating documentation such as user guides and provider communication/training.	X	X		X					
9309.5	The MAC shall email all the Level of Efforts (LOEs) for an MFA optional and required solutions to Delena.Marine2@cms.hhs.gov and to Ada.Sanchez@cms.hhs.gov	X	X	X	X					

III.   PROVIDER EDUCATION TABLE

Number	Requirement	Responsibility				
		A/B MAC			DME MAC	CEDI
		A	B	HHH		
	None					

IV. SUPPORTING INFORMATION

Section A: Recommendations and supporting information associated with listed requirements: N/A

"Should" denotes a recommendation.

X-Ref Requirement Number	Recommendations or other supporting information:

Section B: All other recommendations and supporting information: N/A

V. CONTACTS

Pre-Implementation Contact(s): Ada Sanchez, 410-786-9466 or Ada.Sanchez@cms.hhs.gov , Delena Marine, 410-786-2127 or Delena.Marine2@cms.hhs.gov

Post-Implementation Contact(s): Contact your Contracting Officer's Representative (COR).

VI. FUNDING

Section A: For Medicare Administrative Contractors (MACs):
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ATTACHMENTS: 0