

CMS Manual System	Department of Health & Human Services (DHHS)
Pub 100-20 One-Time Notification	Centers for Medicare & Medicaid Services (CMS)
Transmittal 732	Date: July 29, 2010
	Change Request 7030

SUBJECT: Shared System Separation of Duties Enforcement (Technical Control)

I. SUMMARY OF CHANGES: For Medicare Fee-For-Service Claims Processing, any individual assigned administrative privileges (e.g., granting privileges) within a system cannot have rights to perform any other functions within that system.

EFFECTIVE DATE: January 1, 2011

IMPLEMENTATION DATE: January 3, 2011

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/revise 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	

III. FUNDING:

For Fiscal Intermediaries (FIs), Regional Home Health Intermediaries (RHHIs) and/or Carriers:
Not Applicable.

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

**Unless otherwise specified, the effective date is the date of service.*

Attachment – One Time Notification

Pub. 100-20	Transmittal: 732	Date: July 29, 2010	Change Request: 7030
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SUBJECT: Shared System Separation of Duties Enforcement (Technical Controls)

Effective Date: January 1, 2011

Implementation Date: January 3, 2011

I. GENERAL INFORMATION

A. Background: The Centers for Medicare & Medicaid Services (CMS) received a new material weakness in the 2009 Chief Financial Officer’s (CFO) Audit related to the separation of duties and least privilege in Medicare Fee-for-Service Claims Processing. Medicare contractors must remain diligent and comply with CMS’ Acceptable Risk Safeguards (ARS).

The focus of the material weakness centered on users having special system administration role responsibilities within the claims processing systems. These privileges conflict with the ability to process, update and change the status of claims, as well as having rights within any auto adjudication software.

Any individual assigned administrative privileges (e.g., granting privileges) within a system cannot have rights to perform any other functions within that system. Having both of these capabilities does not comply with existing ARS related to separation of duties and least privilege.

B. Policy: The CMS Access Control Acceptable Risk Safeguards, Access Control family (AC-5, AC-6) require that the following be enforced:

- Separation of duties to eliminate conflicts of interest in the responsibilities and duties assigned to individuals. Personnel responsible for administering access control functions shall not also administer audit functions or be assigned business functions;
- Least privilege, where each user shall be assigned the most restrictive set of privileges needed for the performance of authorized tasks.

II. BUSINESS REQUIREMENTS TABLE

Use “Shall” to denote a mandatory requirement

Number	Requirement	Responsibility (place an “X” in each applicable column)									
		A / B M A C	D M M A C	F I I E R	C A R R E R	R H H I	Shared-System Maintainers				OTH ER
						F I S S	M I C S	V M S	C W F		
7030.1	The FISS shall allow only designated access administrators read and update privileges to the Operator Control File.						X				
7030.1.1	The FISS designated access administrator shall not have						X				

Number	Requirement	Responsibility (place an "X" in each applicable column)									
		A / B	D M E	F I	C A R R I E R	R H I	Shared-System Maintainers				OTH ER
							F I S S	M C S	V M S	C W F	
	any rights or privileges to perform any claim transaction activities.										
7030.1.2	The FISS designated access administrator shall not have the capability to update the disposition of Reason Codes.						X				
7030.1.3	The FISS designated system administrator shall not have the ability to enter Direct Data Entry (DDE) claims.						X				
7030.1.4	The FISS designated system administrator shall not have the ability to change the status/location of a claim.						X				
7030.1.5	The FISS designated system administrator shall not have access to code and/or promote changes within the Expert Claims Processing System (ECPS).						X				
7030.1.6	The FISS designated system administrator shall only grant FISS privileges.						X				
7030.1.7	The FISS designated system administrator shall not have any other rights within the FISS System.						X				
7030.2	The MCS shall allow only designated access administrators read and update privileges to the Clerk File.							X			
7030.2.1	The MCS designated system administrator shall not have any rights or privileges to perform any claim transaction activities.							X			
7030.2.2	The MCS designated system administrator shall not have any rights to the System Control File (SCF).							X			
7030.2.3	The MCS designated system administrator shall only grant MCS privileges.							X			
7030.2.4	The MCS designated system administrator shall not have any other rights within the MCS System.							X			
7030.3	The VMS shall allow only designated access administrators access to assign VMS VSEC switches.								X		
7030.3.1	The VMS designated system administrator shall not have any rights or privileges within the SuperOp auto adjudication software.								X		
7030.3.2	The VMS designated system administrator shall not have any rights or privileges to perform any claim transaction activities.								X		
7030.3.3	The VMS designated system administrator shall only have rights to grant VMS privileges.								X		
7030.3.4	The VMS designated system administrator shall have not have any other rights within the system.								X		

III. PROVIDER EDUCATION TABLE

Number	Requirement	Responsibility (place an "X" in each applicable column)									
		A / B M A C	D M E M A C	F I M A C	C A R I E R	R H I I S S	Shared-System Maintainers				OTH ER
						F I S S	M C S	V M S	C W F		
	None.										

IV. SUPPORTING INFORMATION

No additional supporting information required.

Section A: For any recommendations and supporting information associated with listed requirements, use the box below: N/A

Use "Should" to denote a recommendation.

X-Ref Requirement Number	Recommendations or other supporting information:

Section B: For all other recommendations and supporting information, use this space: N/A

V. CONTACTS

Pre-Implementation Contact(s):

CMS Security; Frank Schreibman

Post-Implementation Contact(s):

CMS Security Policy: Frank Schreibman

FISS Operations; Sylvia Sampson

MCS Operations: Tammy Amendola

VMS Operations: Adria Lucca

VI. FUNDING

Section A: For *Fiscal Intermediaries (FIs)*, *Regional Home Health Intermediaries (RHHIs)*, and/or *Carriers*, use only one of the following statements:

Not Applicable.

Section B: For *Medicare Administrative Contractors (MACs)*, include the following statement:

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.