COALFIRE

WHITE PAPER

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

CMS requirements for Administering Entities

IAN WALTERS, PRINCIPAL
JESSICA PAYNE, CONSULTANT

877-224-8077 | info@coalfire.com | Coalfire.com

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Purpose

This white paper provides a guide for Administering Entities (AEs) to upgrade their System Security and Privacy Plans (SSPPs) from the Minimum Acceptable Risk Standards for Exchanges (MARS-E) 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	51
Awareness and Training	9
Audit and Accountability	19
Assessment, Authorization, and Monitoring	12
Configuration Management	31
Contingency Planning	23
Identification and Authentication	24
Incident Response	16
Maintenance	16
Media Protection	9
Physical and Environmental Protection	19
Planning	6
Program Management	28
Personnel Security	9
Personally Identifiable Information Processing and Transparency	10
Risk Assessment	12
System and Services Acquisition	34
System and Communications Protection	34
System and Information Integrity	34
Supply Chain Risk Management (This Document)	**6**

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.

CMS oversight

The Centers for Medicare & Medicaid Services (CMS) exercises oversight of AEs, 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 AEs to undergo rigorous audit processes, including demonstrating compliance with security and privacy control requirements.
- Enforcing strict data protection measures in the AE 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 AEs to adhere to operational policies and procedures, such as providing accurate plan information, maintaining transparent consumer interactions, and facilitating HIM enrollment without bias.
- Requiring AEs 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 AEs to renew their Authority to Connect (ATC) or Authority to Operate (ATO) annually, providing updated documentation and evidence of continued compliance with all requirements.

Through these oversight mechanisms, CMS ensures that AEs 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 Version 1.02 on April 9, 2025. This framework is slated to replace the Minimum Acceptable Risk Standards for Exchange (MARS-E) 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 ACA AEs.
- AEs must have ARC-AMPE implemented by March 4, 2026.
- The implementation date for EDE entities has yet to be announced as of the date of this white paper.

The minimum control baseline for ARC-AMPE compliance consists of 402 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 represents a significant increase from the MARS-E baseline, and AEs should be prepared for an increased level of effort for developing the SSPP and to submit more artifacts during audits.

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

Control mapping

The mapping of the controls found in MARS-E Version 2.2 (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 MARS-E 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 MARS-E 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.

MARS-E		ARC-AMPE	
Control	**N/A**	**Control**	**SCRM Policy and Procedures**
New NIST 800-53 Rev.5 Control and applicable to ARC-AMPE.		**SR-01 Policy and Procedures** **a.** Develop, document, and disseminate to organization-defined personnel and roles: **1.** Organization-level supply chain risk management policy that: **(a)** Addresses purpose, scope, roles, responsibilities, management commitment, coordination among organizational entities, and compliance; and **(b)** Is consistent with applicable laws, Executive Orders, directives, regulations, policies, standards, and guidelines; and **2.** Procedures to facilitate the implementation of the supply chain risk management policy and the associated supply chain risk management controls; **b.** Designate organization-defined officials to manage the development, documentation, and dissemination of the supply chain risk management policy and procedures; and **c.** Review and update the current supply chain risk management: **1.** Policy at least every one (1) year and following organization-defined events; and **2.** Procedures at least every one (1) year and following organization-defined events.	
Control	**N/A**	**Control**	**Supply Chain Risk Management Plan**
New NIST 800-53 Rev.5 Control and applicable to ARC-AMPE.		**SR-02 Supply Chain Risk Management Plan**	

<table>
<tr><th colspan="2">MARS-E</th><th colspan="2">ARC-AMPE</th></tr>
<tr><td colspan="2"></td><td colspan="2">a. 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.
b. 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
c. Protect the supply chain risk management plan from unauthorized disclosure and modification.</td></tr>
<tr><td>Control</td><td>N/A</td><td>Control</td><td>Establish SCRM Team</td></tr>
<tr><td colspan="2">New NIST 800-53 Rev.5 Control and applicable to ARC-AMPE.</td><td colspan="2">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.</td></tr>
<tr><td>Control</td><td>N/A</td><td>Control</td><td>Supply Chain Controls and Processes</td></tr>
<tr><td colspan="2">• New NIST 800-53 Rev.5 Control and applicable to ARC-AMPE.
• Withdrawn controls SA-12(3) and SA-12(15).</td><td colspan="2">SR-03 Supply Chain Controls and Processes
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.</td></tr>
<tr><td>Control</td><td>N/A</td><td>Control</td><td>Notification Agreements</td></tr>
<tr><td colspan="2">• New NIST 800-53 Rev.5 Control and applicable to ARC-AMPE.
• Withdrawn control SA-12(12).</td><td colspan="2">SR-08 Notification Agreements
Establish agreements and procedures with entities involved in the supply chain for the system, system component, or system service for the notification of supply chain compromises, results of assessments or audits, and organization information.</td></tr>
<tr><td>Control</td><td>N/A</td><td>Control</td><td>Component Disposal</td></tr>
<tr><td colspan="2">• New NIST 800-53 Rev.5 Control and applicable to ARC-AMPE.
• Withdrawn control SA-19(3).</td><td colspan="2">SR-12 Component Disposal
Dispose of organization-defined data, documentation, tools, or system components using the techniques and methods in accordance with the most current NIST SP 800-88, “Guidelines for Media Sanitization.”</td></tr>
</table>

References

NIST SP 800-53 Revision 5.1.1

NIST SP 800-53 Revision 4

CMS Standards

Legal disclaimer

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About the authors

Ian Walters, Principal

Ian is a seasoned cybersecurity professional with a wealth of experience across a spectrum of frameworks and standards, including NIST SP 800-53, HIPAA, ISO 27001, ISO 20000, and ISO 9001.

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.

Jessica Payne, Consultant

Jessica joined Coalfire in 2024 with five prior years of cybersecurity consulting experience. She supports our clients as a Consultant for the GRC Healthcare team where she specializes in cybersecurity risk management, cybersecurity program advisory, and compliance for the healthcare industry.

Her extensive experience in cybersecurity consulting allows her to provide customized solutions and guidance on industry best practices, greatly improving client security postures and ensuring compliance with regulatory standards. She is dedicated to ongoing improvement and to staying abreast of the latest cybersecurity trends and technologies to offer innovative solutions to her clients.

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