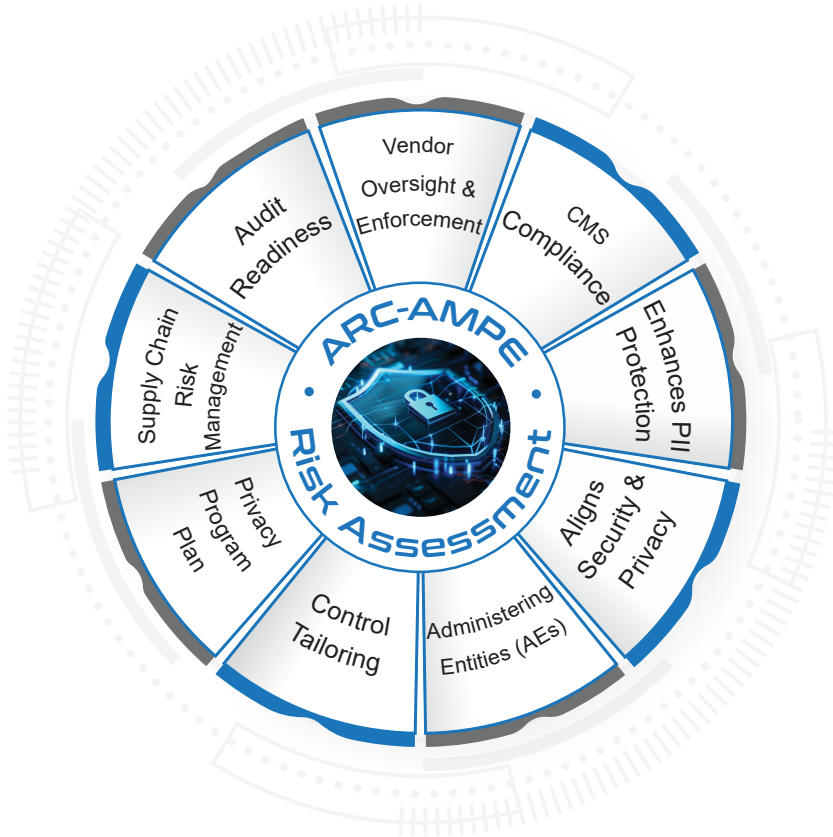


ARC-AMPE

Risk Assessment



What is ARC-AMPE?

- New CMS security and privacy framework
- Replaces MARS-E v2.2; mandatory by March 4, 2026
- Based on NIST SP 800-53 Rev. 5
- Requires 402 baseline controls — up from MARS-E
- Modernizes to match federal and industry standards
- System Security and Privacy Plan (SSPP) is now in Excel format (previously Word)



Key ARC-AMPE Changes

- Privacy controls integrated: New Personally Identifiable Information Processing and Transparency (PT) control family
- Two new families
 - PT (Privacy)
 - SR (Supply Chain Risk)
- No offshore data storage — U.S. only
- Applies to cloud, on-prem, and hybrid systems
- Promotes early security integration in development



CMS Oversight

- Enforces audits & data protection
- Requires breach reporting & risk assessments
- Ensures fair enrollment & policy compliance
- Annual Authority to Connect (ATC) or Authority to Operate (ATO) renewal
- Supports Affordable Care Act (ACA) goals through secure operations

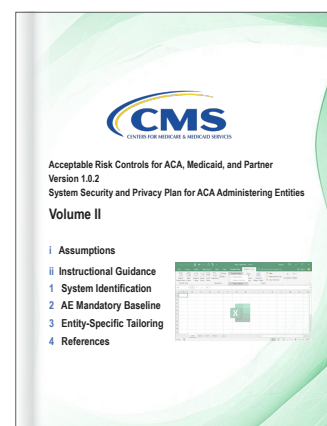
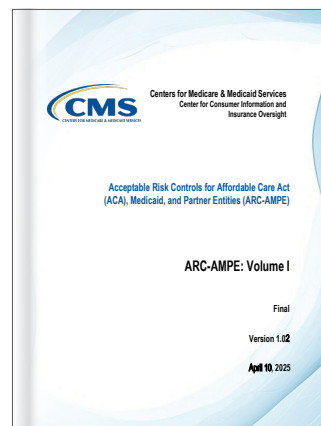
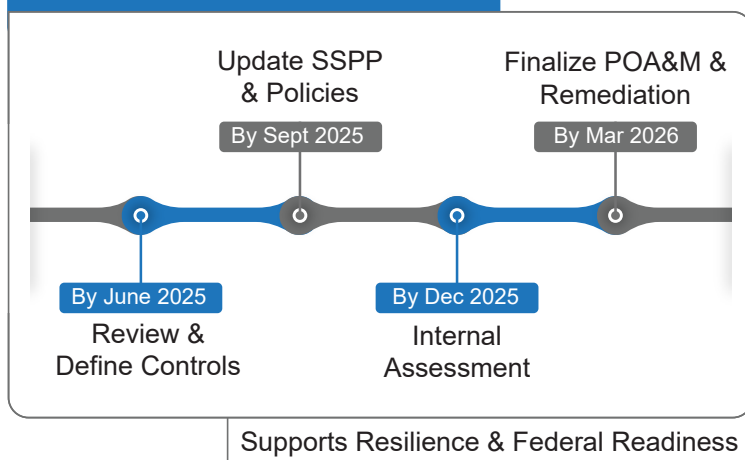
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ARC-AMPE

Risk Assessment



Timeline to Prepare



Control Families

Note: ARC-AMPE control families are similar to those in NIST SP 800-53 Rev. 5.

1	Access Control (AC)	51
2	Awareness and Training (AT)	9
3	Audit and Accountability (AU)	19
4	Assessment, Authorization, and Monitoring (CA)	12
5	Configuration Management (CM)	31
6	Contingency Planning (CP)	23
7	Identification and Authentication (IA)	24
8	Incident Response (IR)	16
9	Maintenance (MA)	16
10	Media Protection (MP)	9
11	Physical and Environmental Protection (PE)	19
12	Planning (PL)	6
13	Program Management (PM)	28
14	Personnel Security (PS)	9
15	Personally Identifiable Information Processing and Transparency (PT)	10
16	Risk Assessment (RA)	12
17	System and Services Acquisition (SA)	34
18	System and Communications Protection (SC)	34
19	System and Information Integrity (SI)	34
20	Supply Chain Risk Management (SR)	6
Total		402

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