CMS Information Security (IS) System Compliance & Reference Chart

Artifact / Activity	Req't Citation	Req'd for	Compliance Frequency	References & Supporting Documentation
Certification & Accreditation (C&A) ¹	FISMA ²		Every 3 years ³	http://www.cms.hhs.gov/informationsecurity/downloads/CA_procedure.pdf
System Security Plan (SSP)	FISMA	C&A	Every 3 years ³	http://cms.hhs.gov/InformationSecurity/Downloads/ssp_meth.pdf
IS Risk Assessment (RA)	FISMA	SSP	Every 3 years ³	http://cms.hhs.gov/InformationSecurity/Downloads/RA_meth.pdf
Contingency Plan	FISMA	C&A	As needed	http://csrc.nist.gov/publications/nistpubs/800-34/sp800-34.pdf
Contingency Plan (CP) Testing	FISMA	C&A	Every 365 days ⁴	http://cms.hhs.gov/InformationSecurity/Downloads/CP_Tabletop_template.zip
Privacy Impact Assessment (PIA)	FISMA	C&A	Annually by June 1st	http://intranet.hhs.gov./infosec/docs/policies_guides/PIA/PIA_Guide.pdf
Security Test & Evaluation (ST&E)	FISMA	C&A	Every 3 years ³	http://cms.hhs.gov/InformationSecurity/Downloads/Reporting_Standard.pdf
Security Controls Testing	FISMA	C&A	A sub-set every 365 days ⁴	http://csrc.nist.gov/publications/drafts/SP800-53A-spd.pdf
Plan of Actions & Milestones (POA&M)	FISMA	C&A	Nov 1, Feb 1, May 1 & Aug 1	http://cms.hhs.gov/informationsecurity/Downloads/poam_guidelines.pdf
Corrective Action Plans (CAP)	FISMA	POA&M	1 st of every month	http://cms.hhs.gov/informationsecurity/Downloads/poam_guidelines.pdf
Security Costs Budgeting	Clinger- Cohen Act ⁵	Exhibit 300	Annually (generally in February)	http://csrc.nist.gov/publications/nistpubs/800-65/SP-800-65-Final.pdf contact OIS-EASG-DITIM for latest CMS guidance document

⁴ Every 365 days, except leap year when it is required every 366 days

Under very special circumstances an Authority to Operate (ATO) may be granted in lieu of an Accreditation until all C&A requirements are fulfilled by the Business Owner FISMA - Federal Information Security Management Act of 2002

Every 3 years, or less as determined by the Chief Information Officer (CIO), unless there are major changes to a system, the system security level is increased, a serious security violation occurs or the threat environment changes. Business Owners must attest annually to the currency of the SSP and RA as part of their FMFIA questionnaire.

⁵ Clinger-Cohen Act, formerly the IT Management Reform Act of 1996 (ITMRA)