Attachment

Federally Facilitated Marketplaces (FFM) System

Finding	Finding Description	Recommended Corrective Action	Risk	Due Date
FFM has an open high finding: No evidence of functional testing processes and procedures being adequate to identify functional problems resulting in non-functional code being deployed.	Software is being deployed into implementation and production that contains functional errors. Untested software may produce functional errors that cause unintentional Denial of Service and information errors.	Retest FFM each quarter and submit a new CMS Security Certification Form for an Authority to Operate (ATO) request each quarter. Following is the CMS Security Certification Form for an ATO request schedule for re-evaluation: January 2014 April 2014 July 2014 October 2014 January 2015. The most recent Security Control Assessment (SCA) should be final and have a Plan of Action and Milestones approved.	The presence of high risk findings in a system represents an increased risk to the CMS enterprise. Lifecycle management of the system requires initial testing for FISMA authorization and continuous monitoring. Non-compliance with the *CMS Information Security (IS) Acceptable Risk Safeguards (ARS), CMS Minimum Security Requirements (CMSR)* without continuous monitoring presents an unacceptable risk. (CA-2).	February 26, 2015