

CMS SENSITIVE INFORMATION – REQUIRES SPECIAL HANDLING

Attachment

Federally Facilitated Marketplaces (FFM) System

Finding	Finding Description	Recommended Corrective Action	Risk	Due Date
Many FFM controls are described in CFACTS as “Not Satisfied”.	Many FFM controls documented in the security controls section of CFACTS have an effectiveness of “Not Satisfied”. Security controls are not documented as being fully implemented.	Update the security controls in CFACTS. Use the Risk Management Handbook Volume II Procedures 4.2 and 5.6.	There is the possibility that the FFM security controls are ineffective. Ineffective controls do not appropriately protect the confidentiality, integrity and availability of data and present a risk to the CMS enterprise. (PL-2).	February 7, 2014
FFM appears to have selected an inappropriate E-Authentication level.	FFM information contains financial and privacy data. According to RMH Volume II Procedure 2.3 and RMH Volume III Standard 3.1; Privacy and financial data should be protected by E-Authentication Level 3 controls.	Review the E-Authentication level of FFM for both users and system administrators. If Level 3 is the appropriate E-Authentication level, implement the appropriate controls and complete the e-Authentication workbook. Ensure system administrators are cleared for positions of trust.	The E-Authentication level of a system determines the security controls and means when connecting to a system over or from an untrusted network. Use of inappropriate controls exposes the enterprise to additional risk. (RA-2).	February 7, 2014
Control inheritance is incorrectly documented in CFACTS.	FFM indicates many of its controls are “under the control of the Terremark”; however, these controls are not described as inherited from the Terremark data center within CFACTS.	Review the FIPS 199 inheritance selections in CFACTS and either select the appropriate inheritance or indicate the controls are solely the responsibility of FFM.	Unclear control responsibility can lead to controls not being appropriately implemented and a lack of accountability. (AU-1).	February 7, 2014