



Centers for Medicare & Medicaid Services

Change Notification Form for Enhanced Direct Enrollment Entities Information Technology Systems

Version 1.1

June 3, 2020

1. Introduction

As part of the continuing efforts to protect the confidentiality, integrity, and availability (CIA) of the information collected, used, disclosed, and/or retained by the Enhanced Direct Enrollment (EDE) Entity's information technology (IT) systems, EDE entities must implement a configuration change control process as part of the configuration management control family described in the EDE system security and privacy plan (SSP). Any system changes that include new, enhanced, or updated hardware and software capabilities; or that apply patches for correcting software flows and new security threats; or that execute changes to business functions and data collection, may cause changes to system configurations as well as the security and privacy posture of the EDE Entity's information systems. Consequently, EDE entities must document system changes and evaluate the scope and nature of the changes in terms of the potential security and privacy impact as an essential aspect of its own change management and continuous monitoring activities.

All changes must be tested, validated, and documented before implementing the changes in the EDE operational environment. If an EDE Entity is planning to make category 1, 2, or 3 changes to its approved EDE environment, the EDE Entity must notify the Centers for Medicare & Medicaid Services (CMS) prior to implementing these changes. CMS provides guidance on EDE Entity-initiated change requests and categorization in the *Change Notification Procedures for Enhanced Direct Enrollment Entity Information Technology Systems* (hereinafter CN Procedures).

1.1 Purpose

The purpose of this document is to provide the EDE System Security and Privacy Change Notification Form that an EDE Entity completes when making changes to its EDE environments. It is applicable to any EDE Entity responsible for managing and administering the security and privacy of the IT systems.

1.2 Instructions

The EDE entities must review and complete the form using the instructions outlined in each section of this form, and the CN Procedures. The form should be submitted to the secure portal with an accompanying notification email to the [DE Help Desk](#) with the email subject line starting with "EDE Entity initiated CR – Category [1, 2, or 3] Change".

The EDE entities must submit additional documentation, as required, through the secure portal.

EDE Entity System Security and Privacy Change Notification Form

EDE Entity System Security and Privacy Change Notification Details
Name of EDE Entity:
Date:
Change Category: For guidance refer to section 2.2 of the CN Procedures.
Reasons for Change:
Change Description: Include a detailed description of the change.
Planned Implementation Date:
Business Impact: Summarize the results of the Business Impact Analysis (BIA).
Security Impact: Summarize the results of the Security Impact Analysis (SIA); please include which security and privacy control families are impacted. (Note: see Section 2.3.1 of the CN Procedures) Include a copy of the detailed SIA report. (Note: see Section 2.3 of the CN Procedures)
Privacy Impact: Describe the how the changes will impact privacy, for example, PII Data Collection, Use, or Disclosure? Is an update of the Privacy Impact Assessment required? If yes, ensure the PIA is updated to reflect the change(s). Is an update of any Upstream Entity's Privacy Impact Assessment required? If yes, ensure the upstream entity's PIA is updated to reflect the change(s). Is an update of the Privacy/TPWA Questionnaire required? If yes, provide the updated Privacy/TPWA Questionnaire. Is an update to the Privacy Policy and/or Terms of Service required? If yes, provide the updated Privacy Policy and/or Terms of Service. Is an update of any Upstream Entity's Privacy Policy and/or Terms of Service required? If yes, provide the updated Privacy Policy and/or Terms of Service for the Upstream Entity.

Sensitive and Confidential Information – For Official Use Only

Centers for Medicare & Medicaid Services

Change Notification Form for EDE Entities IT Systems

EDE Entity System Security and Privacy Change Notification Details

Sensitive and Confidential Information – For Official Use Only

CMS Response <i>(CMS Internal Use Only)</i>
CMS Security and Privacy Comments:
CMS Business Comments: ☐ Approved ☐ Approved with Conditions ☐ Not Approved
Date: