

EXHIBIT P

CMS Requirements

CMS Financial Requirements

- 1) 45 CFR Part 74 (Uniform Administrative Requirements for Awards and Subawards to Institutions of Higher Education, Hospitals, Other Nonprofit Organizations, and Commercial Organizations) or 45 CFR Part 92 (Uniform Administrative Requirements for Grants and Cooperative Agreements to State, Local, and Tribal Governments) as applicable <http://ecfr.gpoaccess.gov>
- 2) Medicaid requirements: CMS Enhanced Funding Requirements: Seven Conditions and Standards <http://www.medicaid.gov/Medicaid-CHIP-Program-Information/By-Topics/Data-and-Systems/Downloads/EFr-Seven-Conditions-and-Standards.pdf>.

CMS Guidance

- 1) CMS standards for connectivity, interfaces, security, and data transmission http://www.cms.gov/TransactionCodeSetsStandards/02_TransactionsandCodeSetsRegulations.asp#TopOfPage.
- 2) CMS Testing Framework document <http://www.cms.gov/SystemLifecycleFramework/Downloads/CMSTestingFrameworkOverview.pdf>.
- 3) Collaborative Environment and Life Cycle Governance – Exchange Reference Architecture (“ERA”) Supplement <http://www.dirigohealth.maine.gov/Documents/Collab%20Env%20LifeCycle%20Governance%20ERA%20Supp%20Drft%20v093%2003162011.pdf>.

Federal Information Technology Policy and Guidelines

- 1) US Department of Health and Human Services – Office of the Chief Information Officer Policy <http://www.hhs.gov/ocio/policy/>.
- 2) Federal Identity, Credential, and Access Management (FICAM) Roadmap and Implementation Guidance <http://www.idmanagement.gov/documents/ficam-roadmap-and-implementation-guidance>. [OPEN]
- 3) Federal Information Security Management Act of 2002 (FISMA) <http://csrc.nist.gov/drivers/documents/FISMA-final.pdf>.
- 4) Funding Opportunity Announcement (“FOA”) Requirements for State-Operated Health Insurance Exchanges <http://www.grants.gov/search/search.do;jsessionid=spH5T6rCcd3LcpvsLv2yRJYxyb8YgTkhhkWFChR8fBJQr9JVJgQS2!966857159?oppId=65693&mode=VIEW>.
- 5) Guidance for Exchange and Medicaid Information Technology (IT) Systems Version 2.0 <http://www.medicaid.gov/Medicaid-CHIP-Program-Information/By-Topics/Data-and-Systems/downloads/exchangemedicaiditguidance.pdf>.

- 6) Harmonized Security and Privacy Framework – Exchange TRA Supplement
http://healthit.hhs.gov/portal/server.pt/community/healthit_hhs_gov_privacy_security_framework/1173.
- 7) CMS TRA – Catalog of Minimum Security Controls for States Supplement
<http://dev.nescies.org/sites/dev.nescies.org/files/CMS%20TRA%20Catalog%20of%20Minimum%20Security%20Controls%20for%20States%20Supp%20Draft%20v%200%202%2009012011.pdf>.
- 8) Medicaid Information Technology Architecture
http://www.cms.gov/MedicaidInfoTechArch/04_MITAFramework.asp#TopOfPage.
- 9) National Institute of Standards and Technology, Special Publication 800-18, Revision 1
<http://csrc.nist.gov/publications/nistpubs/800-18-Rev1/sp800-18-Rev1-final.pdf>.
- 10) Publication 1075: Tax Information Security Guidelines for Federal, State and Local Agencies.
OMB No. 1545-0962 www.irs.gov/pub/irs-pdf/p1075.pdf.