SmartSuite

Framework / Cybersecurity / NIST Special Publications

Minimum Acceptable Risk Standards for Exchanges (MARS-E) Document Suite, Version 2.0 (superseded by ARC-AMPE)

CMS MARS-E 2.0 (November 10, 2015) set security and privacy controls for ACA Exchanges and Medicaid, CHIP and BHP agencies; superseded by ARC-AMPE v1.0 (March 4, 2025).



What it is

CMS MARS-E v2.0 (Minimum Acceptable Risk Standards for Exchanges, Document Suite Version 2.0, November 10, 2015) was the Centers for Medicare & Medicaid Services' security and privacy standard for ACA Administering Entities. It is superseded: CMS released the Acceptable Risk Controls for ACA, Medicaid, and Partner Entities (ARC-AMPE) Version 1.0 on March 4, 2025, with a compliance date of March 4, 2026. ARC-AMPE Volume I states that it "supersedes and replaces MARS-E and the NEE GRC Framework effective upon publication" (footnote 6).

At a glance

PUBLISHER
Centers for Medicare & Medicaid Services (CMS), Center for Consumer Information and Insurance Oversight (CCIIO)

TYPE
Control Framework

VERSION
Document Suite 2.0; superseded by ARC-AMPE 1.0

EFFECTIVE
November 10, 2015

DOMAIN
Cybersecurity

FAMILY
NIST Special Publications

REGION
United States

INDUSTRY
Insurance

ADOPTION MODEL
Regulatory Compliance

IMPLEMENTATION COMPLEXITY
High

Source: cms.gov/marketplace/resources/regulations-guidance

Why it matters

- **A regulatory baseline, not a voluntary one** 45 CFR 155.260(a)(3) obliges every Exchange, and through 155.260(e) the Medicaid, CHIP and BHP agencies that share eligibility data, to implement standards consistent with the rule's principles; MARS-E was CMS's specification of them.
- **Common language with federal agencies** Volume III mirrored NIST SP 800-53 Rev. 4 control families, with Appendix A of Volume II showing each control against MARS-E 1.0, the NIST Moderate baseline and CMS ARS 2.0 plus two ACA-specific controls, SC-ACA-1 and SC-ACA-2.
- **Traceability to the rule** Appendix B of Volume II crosswalks 45 CFR 155.260 to the security controls, so an assessor could show which control satisfied which regulatory requirement.

 © 2026 SmartSuite Inc. All rights reserved.

How SmartSuite supports CMS MARS-E v2.0

Control Catalog with Lineage

Load the Administering Entity's control set with fields for the MARS-E 2.0 and 2.2 identifiers, the NIST SP 800-53 Rev. 4 and Rev. 5 sources and the ARC-AMPE Volume II overlay control that replaces each.

45 CFR 155.260 Crosswalk

Hold the eight 155.260(a)(3) principles and the (a)(4) to (a)(6) safeguards as requirements linked to the controls that satisfy them, as Volume II Appendix B did.

System Security and Privacy Plan Artifacts

Track the SSP or SSPP, assessment plan and report, penetration test results, POA&M, privacy impact assessment and risk acceptance forms submitted for the Authority to Connect, with owners and dates.

Continuous Monitoring and Remediation

Run the Version 2.2 continuous monitoring cadence and the CA-5, RA-5 and SI-2 remediation deadlines as recurring records with evidence attached.

Non-Exchange and Partner Entity Oversight

Manage 155.260(b) contracts, downstream flow-down terms and ARC-AMPE Partner Entity compliance evidence in Third Party Risk Management.

ARC-AMPE Transition Reporting

Report progress from MARS-E to ARC-AMPE Volume II against the March 4, 2026 compliance date: controls remapped, artifacts refreshed, gaps open, ready for CMS review under 45 CFR 155.280.

Common framework mappings

CIS Controls v8.1 | HIPAA (NIST SP 800-66 Rev. 2) | HITRUST CSF v11.5 | ISO 27001:2022 | NIST CSF 2.0 | NIST 800-53 Rev.5 | SOC 2

Official resources

CMS Marketplace Regulations and Guidance: ARC-AMPE and MARS-E

The CMS page that lists the Acceptable Risk Controls for ACA, Medicaid, and Partner Entities (released March 4, 2025) that replaced MARS-E, with the archived MARS-E documents.

cms.gov/marketplace/resources/regulations-guidance

Frequently asked questions

Is CMS MARS-E 2.0 still in force?

No. ARC-AMPE Version 1.0, released March 4, 2025 with a compliance date of March 4, 2026, "supersedes and replaces MARS-E and the NEE GRC Framework effective upon publication" (ARC-AMPE Volume I, footnote 6). MARS-E 2.0 of November 10, 2015 and the interim Version 2.2 of February 23, 2021 remain the lineage of the controls that ACA Administering Entities now document in the ARC-AMPE Volume II System Security and Privacy Plan.

Who had to comply with MARS-E?

All ACA Administering Entities: Exchanges or Marketplaces, whether federal or state, state Medicaid agencies, Children's Health Insurance Program agencies and state agencies administering the Basic Health Program, and their employees, contractors, subcontractors and facilities supporting the systems (Volume II, Foreword and section 1.1). The legal basis is section 1411(g) of the Affordable Care Act and 45 CFR 155.260(a)(3) and (e), with HHS oversight under 45 CFR 155.280.

 Updated Oct 29, 2026 · © 2026 SmartSuite Inc. All rights reserved.

What were the four volumes of MARS-E 2.0?

Volume I Harmonized Security and Privacy Framework; Volume II Minimum Acceptable Risk Standards for Exchanges; Volume III Catalog of Minimum Acceptable Risk Security and Privacy Controls for Exchanges; and Volume IV ACA Administering Entity System Security Plan, which also held the federal tax information requirements in its Appendix A (Volume II, Foreword). Version 2.2 consolidated them into two volumes.

Which NIST baseline did MARS-E use?

The NIST SP 800-53 Rev. 4 Moderate baseline, as tailored by CMS through the CMS Acceptable Risk Safeguards 2.0, on the assumption that each Administering Entity system is categorized Moderate and holds personally identifiable information (Volume II, section 2). Appendix A of Volume II compares every control with MARS-E 1.0, the NIST Moderate baseline and ARS 2.0, and adds two ACA-specific controls, SC-ACA-1 and SC-ACA-2. ARC-AMPE moves the basis to NIST SP 800-53 Rev. 5 and SP 800-53B.

What does 45 CFR 155.260 require that MARS-E implemented?

Each Exchange must establish privacy and security standards consistent with eight principles: individual access, correction, openness and transparency, individual choice, collection, use and disclosure limitations, data quality and integrity, safeguards and accountability (155.260(a)(3)). It must implement operational, technical, administrative and physical safeguards (a)(4), monitor and periodically assess its controls (a)(5), use secure electronic interfaces (a)(6) and bind non-Exchange entities by contract (b). Appendix B of MARS-E Volume II crosswalked these requirements to the controls.

License included / downloadable: Yes The MARS-E volumes and the ARC-AMPE volumes are U.S. government documents published free on cms.gov; the platform links to the official texts.

Full framework page and mappings: smartsuite.com/frameworks/us-cms-mars-e-v20-minimum-acceptable-risk-standards-for-exchanges

 © 2026 SmartSuite Inc. All rights reserved.