

How to Establish a DMP SAQ

For new or existing DUA organizations required to complete a CMS Data Management Plan Self-Attestation Questionnaire (DMP SAQ)

Why You Need a DMP SAQ

The CMS Data Use Agreement (DUA) for Research Identifiable Files (RIF) outlines data security baselines required for protecting CMS data. CMS verifies compliance with these requirements through your organization's completion of a Data Management Plan (DMP). CMS has updated its requirements for data privacy and security. DUAs for RIF requests now require a **DMP Self-Attestation Questionnaire** (SAQ). Each approved DMP SAQ is valid for one year and can be applied to all your organization's DUAs that utilize the same computing environment to store and process CMS data. The DMP SAQ verifies compliance using the CMS Acceptable Risk Safeguards (ARS) 3.1 Publication data security framework.

Step 1: Prepare

To prepare for completing the DMP SAQ, visit the DMP SAQ Web page at https://resdac.org/request-form/dmp-saq to understand the updated process, review the form, and identify the stakeholders your organization will need to complete the DMP SAQ.

Step 2: Initiate

To initiate a DMP SAQ, please reach out to the CMS Data Privacy Safeguard Program (DPSP) at DPSP@cms.hhs.gov. The DPSP will support your organization in navigating the new requirements, completing the new form, and supporting your transition to a DMP SAQ to have on record with CMS.

Step 3: Submit

To submit a DMP SAQ, email the completed form to the DPSP at DPSP@cms.hhs.gov. The DPSP will conduct a review of your responses and the attested policies and procedures. The DPSP may reach out to you for further information.

Step 4: Approval

The DPSP will notify the Data Custodian identified on the DMP SAQ of the approval of your organization's DMP SAQ via email. The approved DMP SAQ will be maintained in your organization's profile in CMS's DUA tracking system, the Enterprise Privacy Policy Engine (EPPE). The DMP SAQ is valid for one year from the date of approval and may be utilized for any DUAs that use the same computing environment to store and process CMS data. If the DMP SAQ is not approved, DPSP will continue to work with your organization to provide recommendations and guidance until the DMP SAQ is approved.

This guide is provided in support of the Data Privacy Safeguard Program (DPSP) by MBL Technologies, the authorized contractor for the DPSP. For questions, please contact DPSP@cms.hhs.gov.