August 2, 2019

Frequently Asked Questions (FAQs) Regarding the 2020 Audit Submission Timeline for Third-party Auditor Operational Readiness Reviews for the Enhanced Direct Enrollment (EDE) Pathway

The following FAQs detail the requirements and submission timeline for prospective EDE Entities or EDE Entities that plan to seek approval to use the EDE pathway in calendar year 2020. Please note, the current EDE program requirements for calendar year 2019 are defined in the Third-party Auditor Operational Readiness Reviews for the Enhanced Direct Enrollment Pathway and Related Oversight Requirements (published February 19, 2019) (EDE Guidelines).¹

The Centers for Medicare & Medicaid Services (CMS) is releasing these FAQs now to allow EDE Entities and prospective EDE Entities to begin preparing for next year’s audit submission window.

1. When is the audit submission window for EDE Entities that plan to seek approval to use the EDE pathway in calendar year 2020?

The audit submission window for EDE Entities that plan to seek approval to use the EDE pathway in calendar year 2020 will begin on March 1, 2020 and will end on June 30, 2020. A complete audit must be submitted to CMS by June 30, 2020. CMS will reject incomplete audits.²

2. What should EDE Entities do now to prepare for the 2020 audit submission window?

CMS expects to release updated Guidelines prior to the start of the 2020 audit submission window to allow EDE Entities to prepare their audits. Any EDE Entity preparing for the 2020 audit submission window is encouraged to begin developing its EDE environment by referencing the program requirements in the EDE Guidelines for the current year,³ privacy and security audit documentation,⁴ business audit documentation,⁵ and other technical documentation⁶ available on CMS zONE.⁷

² For more information regarding the current (and subject to change) audit completeness standards, please refer to Section X.C of the EDE Guidelines. Id.
³ Id.
⁷ https://zone.cms.gov/document/enhanced-direct-enrollment