

DEPARTMENT OF HEALTH & HUMAN SERVICES  
Centers for Medicare & Medicaid Services  
Center for Consumer Information and Insurance Oversight  
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Washington, DC 20201



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**Date:** April 9, 2020  
**From:** Center for Consumer Information and Insurance Oversight (CCIIO)  
**Title:** Enhanced Direct Enrollment (EDE) and COVID-19 Guidance  
**Subject:** Updated 2020 Third-party Audit Submission Deadline for Prospective Primary EDE Entities Seeking to Implement EDE and Existing Primary EDE Entities Seeking to Change Phases in Calendar Year 2020

CCIIO realizes that prospective and existing EDE entities may be facing challenges related to system access, workforce and auditor availability, and other issues related to the need for social distancing to prevent the spread of COVID-19. Due to the public health emergency posed by the virus and the urgent need to provide entities flexibility in managing these challenges, CCIIO is extending the deadline by which prospective primary EDE entities interested in implementing EDE and existing primary EDE entities seeking to change phases in calendar year 2020 must submit business requirements and privacy and security audits from June 30, 2020 to **July 31, 2020**. This extension provides additional flexibility and time for prospective and existing primary EDE entities to submit audits this year.

Please note that the EDE approval process typically takes at least several months after audit submission, and may take up to a year or more depending on a variety of factors (e.g., the quality of the audit(s) and documentation submitted to CMS; the selected end-state phase; the quality of the build of the EDE environment; the timeliness of resubmissions). Therefore, CCIIO continues to strongly encourage entities hoping to be approved to participate in EDE or to change phases by the upcoming plan year 2021 open enrollment period to submit their business requirements and privacy and security audits as soon as possible.

For more information about the 2020 EDE audit submission window, including its applicability, please refer to *Third-party Auditor Operational Readiness Reviews for the Enhanced Direct Enrollment Pathway and Related Oversight Requirements* available at:  
<https://www.cms.gov/CCIIO/Resources/Regulations-and-Guidance/Downloads/Guidelines-for-Third-Party-Auditors-EDE-PY20PY21-Year3.pdf>

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