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Crosswalking DMP SAQ 5.1 to the Previous DMP SAQ 3.1

For organizations who previously completed the DMP SAQ based on CMS ARS 3.1 and are transitioning to the new DMP SAQ based on CMS ARS 5.1.

Referencing your DMP to Complete the DMP SAQ

The Data Management Plan Self Attestation Questionnaire (DMP SAQ) for CMS Data Use Agreements (DUAs) has been updated. The new Data Management Plan Self-Attestation Questionnaire (DMP SAQ) reflects the security and privacy provisions outlined in the [CMS Acceptable Risk Safeguards \(ARS\) 5.1x](#) data security framework.

The table below crosswalks the questions and controls in the DMP SAQ 5.1 to the previous iteration of the DMP SAQ, version 3.1. The table guides organizations to understand what questions, controls, or requirements have been updated, added or removed. For guidance on responding to questions in the new DMP SAQ, please refer to the DMP SAQ Requirements & Guidance for Security & Privacy Controls available at <https://www.cms.gov/data-research/files-order/data-disclosures-and-data-use-agreements-duas/cms-data-privacy-safeguard-program-dpsp>. Individuals may also contact DPSP@cms.hhs.gov for assistance at any time.

Control Family	DMP SAQ 3.1 Question / Control	DMP SAQ 5.1 Update
Access Controls	1.1 (AC-01 control)	Added requirement
Access Controls	1.2 (AC-02 control)	Added requirement
Access Controls	1.3 (AC-04 control)	No change
Access Controls	1.4 (AC-21 control)	No change
Access Controls	1.5 (AC-03 control)	No change
Access Controls	1.6 (AC-05 control)	No change
Access Controls	1.7 (AC-06, AC-06(01), AC-06(09) controls)	Updated language
Access Controls	1.8 (AC-07 control)	No change
Access Controls	1.9 (AC-08 control)	No change
Access Controls	1.10 (AC-11 control)	Updated language and added requirement



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Access Controls	1.11 (AC-14 control)	Updated language and added requirement
Access Controls	1.12 (AC-17 control)	Minor edits
Access Controls	1.13 (AC-18, AC-18(01) controls)	Updated language Control reference to AC-19 added. AC-18(01) control reference removed.
Access Controls	1.14 (AC-20, AC-20(01), AC-20(02)) controls)	Updated language
Access Controls	1.15 (AC-21 control)	No change
Awareness and Training Controls	2.1 (AT-02 control)	Updated language to include privacy
Awareness and Training Controls	2.2 (AT-03 control)	Updated language to include privacy
Audit and Accountability Controls	3.1 (AU-01 control)	Updated language and added requirement
Audit and Accountability Controls	3.2 (AU-02 control)	Updated language
Audit and Accountability Controls	3.3 (AU-03, AU-03(01) controls)	Minor edits
Audit and Accountability Controls	3.4 (AU-04, AU-11 controls)	Updated language and removed AU-11 control reference
Audit and Accountability Controls	3.5 (AU-05 control)	Updated language
Audit and Accountability Controls	3.6 (AU-06, AU-06(03) control)	Updated language
Audit and Accountability Controls	3.7 (AU-07(01), AU-07(02) controls)	Removed AU-07(02) control reference
Audit and Accountability Controls	3.8 (AU-08, AU-08(01) controls)	Removed AU-08(01) control reference
Audit and Accountability Controls	3.9 (AU-09, AU-09(04) controls)	Updated language
Audit and Accountability Controls	3.10 (AU-11 control)	Minor edits
Security Assessment and Authorization Controls	4.1 (CA-01 control)	Updated language and added requirements
Security Assessment and Authorization Controls	4.2 (CA-03, CA-03(05), CA-09 controls)	Update language and removed CA-03(05) control reference
Security Assessment and Authorization Controls	4.3 (CA-03(05) control)	Question moved to question 16.4. CA-03(05) control withdrawn and incorporated into SC-07(05).



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Security Assessment and Authorization Controls	4.4 (CA-07 control)	<i>Renumbered to question 4.3 and language updated</i>
Configuration Management Controls	5.1 (CM-01 control)	<i>Added requirement</i>
Configuration Management Controls	5.2 (CM-03 control)	<i>Updated language</i>
Configuration Management Controls	5.3 (CM-06 control)	<i>No change</i>
Configuration Management Controls	5.4 (CM-02 control)	<i>Added requirements</i>
Configuration Management Controls	5.5 (CM-05 control)	<i>No change</i>
Configuration Management Controls	5.6 (CM-07 control)	<i>Minor edits</i>
Configuration Management Controls	5.7 (CM-08, CM-08(01) controls)	<i>Added requirement</i>
Configuration Management Controls	5.8 (CM-11 control)	<i>No change</i>
Contingency Planning Controls	6.1 (CP-01)	<i>Added requirements and control reference to CP-02(01) control</i>
Contingency Planning Controls	6.2 (CP-09 control)	<i>Updated language to include privacy</i>
Identification and Authentication Controls	7.1 (IA-01 control)	<i>Added requirement</i>
Identification and Authentication Controls	7.2 (IA-02, IA-03, IA-05 controls)	<i>Update language and added IA-12 control reference</i>
Identification and Authentication Controls	7.3 (IA-02 control)	<i>No change</i>
Identification and Authentication Controls	7.4 (IA-03 control)	<i>No change</i>
Identification and Authentication Controls	7.5 (IA-04 control)	<i>Updated language</i>
Identification and Authentication Controls	7.6 (IA-06 control)	<i>No change</i>
Incident Response Controls	8.1 (IR-01 control)	<i>Added requirement</i>
Incident Response Controls	8.2 (IR-04, IR-05 controls)	<i>Updated language</i>
Incident Response Controls	8.3 (IR-02 control)	<i>This question has been renumbered with updated language to question 8.4 in DMP SAQ 5.1. Question 8.3 is</i>



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		<i>now based on IR-08(01) regarding breach reporting.</i>
Incident Response Controls	<i>8.4 (IR-04, IR-05 controls)</i>	<i>This question has been renumbered to 8.5 with updated language.</i>
Incident Response Controls	<i>8.5 (IR-04, IR-05 controls)</i>	<i>This question has been removed and replaced with the previous question 8.4 with updated language.</i>
Incident Response Controls	<i>8.6 (IR-07 control)</i>	<i>Updated language to include privacy</i>
Incident Response Controls	<i>8.7 (IR-08 control)</i>	<i>Added requirement</i>
Incident Response Controls	--	<i>Question 8.8 added with control reference IR-08(01)</i>
Maintenance Controls	<i>9.1 (MA-01 control)</i>	<i>Added requirement</i>
Maintenance Controls	<i>9.2 (MA-03, MA-03(01) controls)</i>	<i>No change</i>
Maintenance Controls	<i>9.3 (MA-03(02) control)</i>	<i>No change</i>
Media Protection Controls	<i>10.1 (MP-01 control)</i>	<i>Updated language and question now requires rationale</i>
Media Protection Controls	<i>10.2 (MP-03 control)</i>	<i>Question renumbered to 10.5</i>
Media Protection Controls	<i>10.3 (MP-04, MP-06 controls)</i>	<i>Question renumbered to 10.4 and now requires rationale</i>
Media Protection Controls	<i>10.4 (MP-05 control)</i>	<i>Question renumbered to 10.6</i>
Media Protection Controls	<i>10.5 (MP-06, MP-06(01) controls)</i>	<i>Question renumbered to 10.7</i>
Media Protection Controls	<i>10.6 (MP-07 control)</i>	<i>Question renumbered to 10.2 and now requires rationale. MP-07(01) control reference removed.</i>
Media Protection Controls	<i>10.7 (MP-07 control)</i>	<i>Question renumbered to 10.3 with updated language and now requires rationale. MP-07(01) control reference removed.</i>
Media Protection Controls	<i>10.8 (MP-CMS-01 control)</i>	<i>Question removed</i>
Physical and Environmental Controls	<i>11.1 (PE-01 control)</i>	<i>Added requirement</i>
Physical and Environmental Controls	<i>11.2 (PE-02 control)</i>	<i>No change</i>



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Physical and Environmental Controls	<i>11.3 (PE-03 control)</i>	<i>No change</i>
Physical and Environmental Controls	<i>11.4 (PE-04 control)</i>	<i>No change</i>
Physical and Environmental Controls	<i>11.5 (PE-04 control)</i>	<i>No change</i>
Planning Controls	<i>12.1 (PL-02 control)</i>	<i>Updated language to include privacy and added requirement</i>
Planning Controls	<i>12.2 (PL-04 control)</i>	<i>Updated language to include privacy and added requirement</i>
Personnel Security Controls	<i>13.1 (PS-03 control)</i>	<i>Updated language</i>
Personnel Security Controls	<i>13.2 (PS-04 control)</i>	<i>Minor edits</i>
Personnel Security Controls	<i>13.3 (PS-03 control)</i>	<i>No change</i>
Personnel Security Controls	<i>13.4 (PS-06 control)</i>	<i>No change</i>
Personnel Security Controls	<i>13.5 (PS-07 control)</i>	<i>No change</i>
Personnel Security Controls	<i>13.6 (PS-08 control)</i>	<i>No change</i>
Risk Assessment Controls	<i>14.1 (RA-05 control)</i>	<i>No change</i>
System and Services Acquisition Controls	<i>15.1 (SA-05 control)</i>	<i>Updated language</i>
System and Services Acquisition Controls	<i>15.2 (SA-08 control)</i>	<i>Updated language and added SA-03 control</i>
System and Services Acquisition Controls	<i>15.3 (SA-09 control)</i>	<i>Updated language to include privacy</i>
System and Communications Protection Controls	<i>16.1 (SC-07 control)</i>	<i>Updated language</i>
System and Communications Protection Controls	<i>16.2 (FIPS 140-2; SC-08, SC-13, SC-28 controls)</i>	<i>No change</i>
System and Communications Protection Controls	<i>16.3 (SC-02 control)</i>	<i>No change</i>
System and Communications Protection Controls	<i>16.4 (SC-10 control)</i>	<i>Question renumbered to 16.5 and language updated</i>

System and Communications Protection Controls	16.5 (SC-12 control)	Question renumbered to 16.6
System and Communications Protection Controls	16.6 (SC-15 control)	Question renumbered to 16.7
System and Information Integrity Controls	17.1 (SI-03 control)	No change
System and Information Integrity Controls	17.2 (SI-04, SI-04(04) controls)	Minor edits
System and Information Integrity Controls	17.3 (SI-07 control)	Minor edits
System and Information Integrity Controls	17.4 (SI-02 control)	Minor edits
System and Information Integrity Controls	17.5 (SI-03 control)	No change
System and Information Integrity Controls	17.6 (SI-08 control)	Updated language
System and Information Integrity Controls	17.7 (SI-10 control)	Updated language
System and Information Integrity Controls	17.8 (SI-12 control)	No change
Program Management Controls	18.1 (PM-02 control)	No change
Program Management Controls	18.2 (New question)	Question 18.2 added based on removal of AR-08 control and mapping to PM-21 control
Privacy Controls	The previous privacy control families have been withdrawn from CMS ARS 3.1 and consolidated into the new Personally Identifiable Information Processing and Transparency controls family in CMS ARS 5.1.	
Accountability, Audit and Risk Management	19.1 (AR-01 control)	Question removed. New question based on Personally Identifiable Information Processing and Transparency control PT-01
Accountability, Audit and Risk Management	19.2 (AR-03 control)	Question removed. New question based on Personally Identifiable Information Processing and Transparency control PT-02.



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Accountability, Audit and Risk Management	19.3 (AR-04 control)	<i>Question removed. New question based on Personally Identifiable Information Processing and Transparency control PT-03</i>
Accountability, Audit and Risk Management	19.4 (AR-05(a) control)	<i>Question removed. New question based on Personally Identifiable Information Processing and Transparency control PT-07.</i>
Accountability, Audit and Risk Management	19.5 (AR-05(b)(c) control)	<i>Question removed</i>
Accountability, Audit and Risk Management	19.6 (AR-08 control)	<i>Question removed and incorporated into question 18.2</i>
Accountability, Audit and Risk Management	19.7 (AR-CMS-01 control)	<i>Question removed</i>
Authority and Purpose	20.1 (AP-CMS-01 control)	<i>Question removed. New question based on Supply Chain Risk Management controls SR-01 and SR-02.</i>
New Question	20.2 (New question)	<i>New question based on Supply Chain Risk Management controls SR-03 and SR-06.</i>
New Question	20.3 (New question)	<i>New question based on Supply Chain Risk Management control SR-12.</i>
Data Minimization and Retention	21.1 (DM-CMS-01 control)	<i>Question removed</i>
Data Quality and Integrity	22.1 (DI-CMS-01 control)	<i>Question removed</i>
Individual Participation and Redress	23.1 (IP-CMS-01 control)	<i>Question removed</i>
Security	24.1 (SE-CMS-01 control)	<i>Question removed</i>
Transparency	25.1 (TR-CMS-01 control)	<i>Question removed</i>
Use Limitation	26.1 (UL-CMS-01 control)	<i>Question removed</i>
Use Limitation	26.2 (UL-01, UL-02(a)(b) controls)	<i>Question removed</i>
Use Limitation	26.3 (UL-02(c)(d) controls)	<i>Question removed</i>