# Phase 2 Data Security Audit Requirements

The Phase 2 Data Security Audit is a review of requested information that validates compliance with required Centers for Medicare & Medicaid Services (CMS) Acceptable Risk Safeguards (ARS) security controls. Entities provide documentation to address the following questions:

- Describe the private sources of other data that you will combine with CMS data.
- Describe where the de-identification, aggregation, storage, and processing of data occurs.
- Describe any additional vendors/partners that assist in developing measures or other analyses.
- Describe how the lead entity receives the identified or de-identified provider analyses and reports.
- Describe how the lead entity distributes confidential reports to practices and/or providers for Corrections and Appeals.

  **Note**: This step is only necessary if the lead entity plans to report on data at the provider level.
- Describe how the lead entity completes the Corrections and Appeals process.
- Describe how the lead entity distributes final approved reports to the public.