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MMARS Policy: Interface
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Interim Interface Policy

Executive Summary

This Interim Policy is being issued to address the significant increased threat of government data breaches, thefts and system interruptions, and the Commonwealth's responsibility to maintain the integrity of its financial data, financial reporting and systems critical to ensuring the most favorable financial ratings for the Commonwealth, and to ensure the critical financial operations such as payroll, payment and tax reporting and withholdings are accurate and timely. The Commonwealth is responsible for managing financial data in accordance with state finance law and other state and federal laws and requirements that restrict use and access to data that is considered sensitive, confidential or personally identifiable information. This interim policy applies to all state Departments in the Commonwealth in all branches of government.

This Interim Policy also provides notice to Departments that CTR is undergoing an internal risk assessment to review the collection, use and transmission of any financial data that is required for financial transactions processed through the Massachusetts Management Accounting and Reporting System (MMARS), Human Resources/Compensation Management System (HR/CMS) and any system or application transmitting MMARS or HR/CMS data housed within the Commonwealth Information Warehouse (CIW). This also includes the considerations and requirements for any Department of the Commonwealth requesting an interface of a Departmental or third party vendor application with MMARS, HR/CMS, or any interface that utilizes MMARS or HR/CMS data housed within the CIW, and the requirements for maintaining these interfaces.

Oversight Authority

The Comptroller has broad authority to prescribe accounting rules and instructions for all state Departments and the appropriate use of the state accounting and payroll systems. Pursuant to [G.L. c. 7A, § 7](#), [G.L. c. 7A, § 8](#), [G.L. c. 7A, § 9](#) and [G.L. c. 29, § 31](#) the Comptroller is required to implement a state accounting system (including a centralized payroll system and the CIW and issue instructions for the accounting practices to be used by all Departments for supplies, materials, assets, liabilities, equity, debt, encumbrances, expenditures, revenues, expenses and obligations of all Commonwealth funds and accounts, including payroll, unless specifically exempted by general or special law. The Comptroller has full authority to prescribe, regulate and make changes in the method of keeping and rendering accounts, including the collection, use and transmission of data necessary to support these activities and is authorized to direct state Departments to implement changes in their systems to meet these statewide standards.

Policy

Departments are required to provide a written request for any interface prior to requesting bond funding, procuring, purchasing or initiating any system or application which will necessitate, require or is conditioned upon an interface with MMARS. Departments should not plan for or take any action on building an interface without prior CTR written approval.

There are two types of interfaces:

- Operational interfaces from Departmental systems, such as MassHealth or statewide such as the State Treasurer Systems
- Service delivery interfaces from institutions that provide business services such as Bank Lock Box operations

The Comptroller has full discretion pursuant to [G.L. c. 7A, § 7](#), [G.L. c. 7A, § 8](#), [G.L. c. 7A, § 9](#) and [G.L. c. 29, § 31](#) to approve or reject any request to establish an interface with MMARS and HR/CMS and may revoke approval for any interface or access at any time if an interface or download of financial data risks or compromises the integrity or security of MMARS or its data. The Comptroller may limit or restrict access to data interfacing into the CIW or being accessed or downloaded from the CIW until a risk assessment has been completed to confirm appropriate access, use and transmission of financial data.

MMARS is a dynamic system that is periodically updated to assure the system is using supported vendor versions of software, meets the needs of sound fiscal management, and complies with statutory directives and Government Accounting Standards Board (GASB) financial reporting requirements. Upgrades to the underlying software can involve changes to transaction layouts and database structure. Interface requestors must demonstrate a willingness, commitment and capability to modify their operational interfaces in a time frame coincidental with the MMARS changes.

Interface Requests Considerations.

Requests for interfaces to or from MMARS require in-depth risk assessments, as well as cost benefit and impact analyses relative to the implementation and ongoing obligations of CTR and the interfacing Department(s) to maintain and upgrade these interfaces.

A Department seeking to establish an interface to MMARS from its internal systems or a new application that has not been procured or developed is required to make a formal request that the interface be approved. The Department must provide information regarding the following characteristics of the proposed interface:

- A demonstrated benefit to the Commonwealth through either resource (financial and/or human) savings or increased timeliness and accuracy of the information recorded in MMARS, which also provides means to minimize any associated risk of breach or compromise of MMARS, which shall be determined reasonable by acceptable industry standards;
- A demonstrated technical capacity to develop, implement and operate the interface;
- Financial resources and management commitment to develop and maintain the source system as well as the interface in an on-going business relationship, including funding for upgrades customizations, staff resources and other costs, including CTR's costs, to implement or maintain the interface, if applicable;
- Business context of the Departmental application presenting the interface data;
- Technology foundation of the Department's application;
- Estimated volumes;
- Frequency of interface activity;
- Description of the Department's application management and resources; and
- Location of the application (Inside/Outside MAGNet).

In addition to the above, the Department Head must certify that the Department is prepared to:

- Undergo application and interface security review with CTR and the Massachusetts Office of Information Technology's (MassIT) Chief Information Security Officer, as well as an outside business process and security review.
- Authorize the expenditure of both human and fiscal resources to develop and maintain an effective interface relationship with MMARS. This authorization must include the commitment to acquire, develop and/or implement software and other technology to meet the requirements of MMARS interfaces. This includes the financial resources and management commitment to develop and maintain the interface as an on-going business relationship, including funding for upgrades, customizations, staff resources and other costs, including CTR's costs, to implement or maintain the interface.

- Demonstrated technical capacity to develop, implement, operate and maintain the interface and appropriate quality assurance and controls.
- Application and interface security review with CTR and the MassIT Chief Information Security Officer, or other oversight entity as applicable, which may require independent third party validation.
- Incorporate appropriate interface management and administrative internal controls for the maintenance and operation of the interface.
- Departments requesting an interface with MMARS will be required to demonstrate (which may require independent third party validation) that the application and hosting facilities have the appropriate security procedures and compliance accreditations such as: FedRAMP, FISMA, SOC 2, and/or SSAE 16, at a minimum, and will need to validate compliance annually or as otherwise directed by the Comptroller.

Internal Controls

CTR monitors all interface activity daily or as data is scheduled to interface. In the event that a Department experiences a repeatedly high percentage of either interface control failures or document validation errors once a document is loaded to the MMARS document catalogue, CTR will initiate remedial action to assist the Department to improve performance. If attempts to correct business or technical problems underlying the high error percentage are unsuccessful, CTR may suspend interface processing until the Department has demonstrated an improvement in successful processing.

Information Sources

- Related Procedure - [MMARS Interface Authorization Procedure](#)
- Legal Authority - [M.G.L. c. 7A](#) (Office of the Comptroller); [G.L. c. 29, § 31](#) (State Finance Law);
- Attachments - [Interface Request Form](#)
- None
- Links - Interchange
 - [HR/CMS Interface Policy](#)
- Contacts - [Help Desk](#)

Revisions

- November 1, 2006 - Removed language referencing Knowledge Center and updated relevant links to Mass.gov/osc portal site.
- August 15, 2012 - Removed language referencing CommBridge and replaced with Interchange.
- April 4, 2016 - Replaced current Interface Policy with Interim Interface Policy