

Work Group / Ops Area Reporting WG:Legal/Compliance

Sub Work Group
Legal/Compliance

Submitter Colleen Budniak

Reporting Period
2013/09/13-2013/09/19

Status
Red

Executive Summary

The Legal and Compliance Team is focused on UAT testing and readiness for Open Enrollment on 10/01.

The project is in Red status due to the following reasons:

1. Unable to test for appeals functionality in the COTS system
2. Short time to develop post 10/01 long term process for system security access for non-participants.

Go to Green Plan

1. Escalating issues regarding ability to test for appeals functionality
2. Defining manual work arounds for full process if zero functionality is deemed the delivery for 10/01.
3. Developing long term process for standard non-participant access for BAU.

Accomplishments

1. Completed CCIIO Artifact Submissions
2. Started testing for appeals functionality in UAT
3. Updating Appeals materials based on final federal rules released

Upcoming Milestones

See milestone list in MNsure Tracker

Next Steps

1. Complete additional Inter-agency agreements.
2. Complete additional Administrative Policies
3. Draft procedures for Delegation of Authority
4. Review and finalize Legal Counsel and Advice policies
5. Finalize Internal Audit Policies
6. Finalize External Audit Policies
7. Execute data sharing agreements: IPAs, Navigators, Brokers, Agents
8. Finalize Code of Conduct Policy
9. Finalize Conflict of Interest Policy
10. Finalize Outside Employment Policy

Upcoming Milestones

Milestone	Start Date	Target %	Comp %	Color	Comments	Assigned To	BP
* Develop appropriate privacy protections for consumer information, and establish capacity to accept, store, associate, and process documents (both electronically and via mail/fax)	9/9/2013	100%	100%	GREEN		Fink, Krista	Yes
	9/9/2013						
CIIO Artifact: Information Exchange Agreements (IEA)	9/3/2013	100%	100%	GREEN		Fink, Krista	No
	9/13/2013						
Data Practices Tools and Technology Completed	9/27/2013	100%	100%	GREEN		Fink, Krista	No
	9/27/2013						

Work Group / Ops Area Reporting WG:Legal/Compliance

MNsure Appeals Daily Operational Tools Completed	9/27/2013	100%	30%	GREEN		Kennedy, Jessica M	No
	9/27/2013						
MNsure Legal Advice and Operations Daily Operational Tools completed	9/27/2013	100%	65%	GREEN		Turpin, Michael A.	No
	9/27/2013						
MNsure Legal Advice and Operations Policies, Rules and Procedures completed	8/30/2013	100%	50%	RED		Turpin, Michael A.	No
	9/27/2013						
Business Partner Agreement Completed	9/30/2013	100%	100%	GREEN		Fink, Krista	No
	9/30/2013						
MNsure Compliance External Policies and Procedures Completed	4/15/2013	100%	85%	RED	The focus has been on the Compliance Plan and the IV&V Visits. Once the June IV&V audit is complete, and the Compliance Plan is fully drafted by 6/24, the focus will go back to the Policies and Procedures.	Nyanjom, John	No
	9/30/2013						
MNsure Compliance Internal Policies and Procedures Completed	4/15/2013	100%	85%	RED	The focus has been on the Compliance Plan and the IV&V Visits. Once the June IV&V audit is complete, and the Compliance Plan is fully drafted by 6/24, the focus will go back to the Policies and Procedures.	Nyanjom, John	No
	9/30/2013						
MNsure Appeals Public education materials completed	8/30/2013	100%	90%	RED		Kennedy, Jessica M	No
	9/30/2013						
MNsure Appeals Administrative Policies Rules and Procedures completed	7/12/2013	100%	85%	RED		Kennedy, Jessica M	No
	9/30/2013						
Legal & Compliance Documented Business Processes	8/26/2013	100%	90%	RED		Pearl, Teree	No
	9/30/2013						
First MNsure Appeal Received	10/1/2013	100%	0%	GREEN		Kennedy, Jessica M	No
	6/30/2014						

Risks

Risk Title	Risk Description	CP Trigger Date	Status	Rank (Pxl)	Owner
Abnormally high risk of a data breach during the first 6 months of a new system.	There is an abnormally high risk of a data breach during the first 6 months of a new system.		1-New	25	Fink, Krista
Staff and users will not be trained on data privacy and security for the system, resulting in a heightened risk of data privacy violations.	There is a risk that staff and users will not be trained on data privacy and security for the system, resulting in a heightened risk of data privacy violations.		1-New	20	Fink, Krista
User accounts will not be defined to consider minimal necessary access, resulting in a heightened risk of data privacy violations, undetected errors, fraud, and ethical violations.	There is a risk that user accounts will not be defined in a way that takes into consideration minimal necessary access, resulting in a heightened risk of data privacy violations, undetected errors, fraud, and ethical violations.		1-New	20	Fink, Krista

Work Group / Ops Area Reporting WG:Legal/Compliance

Risk of Identity Theft	There is a risk taht participants completing online applications on public computers (e.g., at the library) will leave behind personally identifiable information on those public computers, resulting in an increased risk for identity theft.	1-New	16	Fink, Krista
SSP and SPR security requirements not im	There is a risk that the security requirement's in the SSP and SPR are not implemented by 10/1, resulting in audit findings and other penalties from CMS and the IRS and potentially affecting MNsire's ability to connect to the federal hub and state tax data.	1-New	15	Fink, Krista
MNsire vendor applications do not have I	MNsire vendor applications do not have IT accessibility solution for 10/1, making the vendor applications non-compliant with federal and state accessibility solutions.	1-New	15	Ciccione, James
MNsire web pages do not have IT accessib	MNsire web pages do not have IT accessibility solution on 10/1, making the MNsire web-site noncompliant with federal and state accessibility regulations.	1-New	15	Ciccione, James
No system solution to support appeals pro	MNsire will not have a system solution to support the appeals process, which results in significantly increased workload from manual workarounds.	1-New	10	Pearl, Teree
MNsire compliance will not find right skill	MNsire compliance will not find the right skill set of people to complete audits (tech requirements), resutling in a weaker compliance program.	1-New	9	Nyanjom, John
MNsire will not have access to DEED to va	There is a risk that MNsire will not have access to income verification data from DEED, making it dificult or impossible to validate some of the income assertions and increasing the risk that erroneous eligibility determinations will be made.	1-New	8	Nyanjom, John
Risk of Tennessen warning not displaying a	There is a risk of the Tennessen warnings not displaying as required on MNsire web pages and applications.	1-New	6	Fink, Krista
MNsire will not be able to securities and p	There is a risk that the security policies and procedures will not be approved by 8/30, resulting in audit findings by state and federal regulators.	1-New	6	Fink, Krista

Issues

Decisions