



Consumer Protection & System Security Update

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Consumer Protection



Goal:

To act responsibly to protect consumers against deceptive, fraudulent or unfair practices.

Partners

- Colorado Division of Insurance
- Colorado Attorney General Department of Law
- Local Law Enforcement
- Consumer Advocates
- The Federal Trade Commission
- Health and Human Services Office of Inspector General
- Connect for Health Colorado

Customer Service Center Protections

- Organization-wide MARS-E/HIPAA compliance
 - Training
 - Secure environments
 - Internal controls
 - Identification badges
 - Motion sensors
 - Cameras
 - Staff background checks
 - Monitoring
 - Customer security protocols

Assistance Sites & Health Coverage Guides

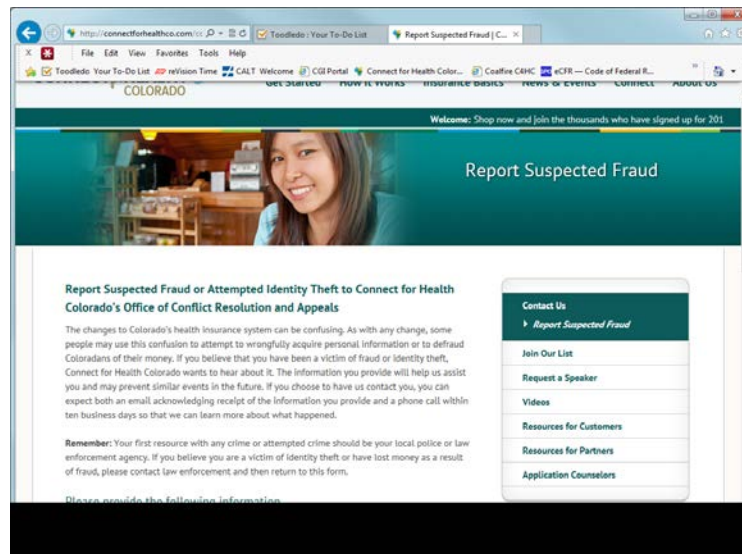
- Certification
- Background checks for Health Coverage Guides
- Training specific to fraud, waste & abuse and related topics
- Internal controls
- Audit requirements
- Site visits for compliance and adherence to standards
- Identification badging
- Website lookup for association verification
- Conflict of interest standards

Agents/Brokers

- Certification process
- Requirement for background checks
- Training specific to fraud, waste & abuse and related topics
- State license requirements
- Website lookup for certified agents/brokers
- Fair Practice Standards

Fraud Reporting Capability

- Form available on website
 - <http://connectforhealthco.com/connect/contact-us/report-suspected-fraud/>



- Advised to contact local law enforcement if a crime is suspected
- FTC contact information to be added
- Routed to Appeals and Conflict Resolution staff and/or DOI for follow up and action

Appeals

- The Office of Conflict Resolution and Appeals allows consumers to contact an independent office that will respond to their concerns
- The office provides a medium for reporting an errant or wrongful action
- The Appeals staff have legal backgrounds
- Every consumer contact receives the same consideration and evaluation

System Security

Information Security and Privacy Program



MARS-E Compliance

- Minimal Acceptable Risk Standards for Exchanges, a compilation of security and privacy requirements and regulations from various organizations and agencies, including:
 - There are 19 risk control families within 3 classes (technical, operational, and management)
 - These families, from the CMS taxonomical summary, include:
 - FTI Safeguards (IRS Publication 1075)
 - Access Control
 - Awareness & Training
 - Configuration Management
 - Identification & Authentication
 - Incident Response
 - System & Communications Protection

Policies and Procedures

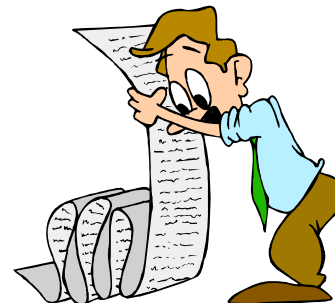
In support of MARS-E compliance, Connect for Health Colorado implemented more than 2 dozen policies that addresses topics such as:

- System protection and integrity
- Security Planning
- PII Security

Updates ongoing based on implementation experience

Technical Controls Update

- Defense in Layers
 - Network Firewalls
 - Web Application Firewalls
 - Database Activity Monitoring
- Roles and Accesses
 - Adapting to support business needs
 - Focus on minimizing access
- Logging
 - Supports Operational Analysis
 - Verifies Controls



Activity Highlights

- Training and Awareness
 - 900 Series
 - Follow Up Events
 - Training sustainment
- Awareness of other Marketplaces
 - Understanding their challenges
 - Learning Lessons
- Routine participation in operational meetings
 - Situational awareness and risk analysis
- Ongoing Security Testing and Incident Analysis
 - Quick response



Tuning and Refining at All Levels...