

Action Plan and Status of OSA Recommendations

Finding #	Audit Recommendations	Action Items	Progress to Date
1A	Connect for Health Colorado should improve its controls over procurement, spending, contracting, and grants management by - Implementing a process to update written policies and procedures so that they consistently and accurately reflect the processes that management and staff are expected to follow.	<ol style="list-style-type: none"> 1) Quarterly review of the policy and procedures to ensure the policies and procedures are in line with current practices 2) Documentation of quarterly review of policy and procedures 	<p>Inventory and review tracking sheet of policies and procedures is implemented.</p> <p>Policies and Procedures have be distributed to the following departments for review:</p> <ul style="list-style-type: none"> - Finance - Human Resources - Appeals - Assistance Network
1B	Connect for Health Colorado should improve its controls over procurement, spending, contracting, and grants management by - Implementing a process to revise contracts to ensure that they accurately reflect current vendor and grantee performance expectations and documentation requirements for payment requests.	<ol style="list-style-type: none"> 1) Amend contracts when the original terms are no longer feasible or beneficial to the organization. 2) Update Existing Contract Management procedures 3) Implement a Contract Management Checklist <ul style="list-style-type: none"> - Identifies responsibilities of staff - Including payment documentation 4) Provide staff training on Contract Management <ul style="list-style-type: none"> - Including instructions on new contract review/checklist process - Including process to amend contracts when they need to be adjusted - Including instruction on responsibilities for notifying mgmt. and finance 5) Staff with contract management responsibilities will be required to sign the Checklist a minimum of annually, subsequent to the initial checklist signoff 	<p>Updating existing Contract Management Procedure document is in process.</p> <p>The Contract Management Checklist is in draft form and has been distributed for comment.</p> <p>Evaluating the use of the LMS to distribute and administer training to staff.</p> <p>Inventorying contracts to distribute to contract managers for initial review.</p>
1C	Connect for Health Colorado should improve its controls over procurement, spending, contracting, and grants management by - Developing and implementing a corrective action plan to address all audit findings.	<ol style="list-style-type: none"> 1) Action Plan addressing improvement in our policies, procedures and processes 2) Implementation dates added to audit findings to tracking system 	<p>Action Plan is being developed for addressing the 2014 comments, including implementation dates and tracking of findings that were labeled partially implemented.</p>
1D	Connect for Health Colorado should improve its controls over procurement, spending, contracting, and grants management by - Conducting ongoing follow up reviews to ensure current policies are enforced and all external and internal audit recommendations have been implemented.	<ol style="list-style-type: none"> 1) Audit Tracking Matrix <ul style="list-style-type: none"> - Include Implementation status and dates - Include Internal Audit signoff on completion 2) Internal Audit Plan <ul style="list-style-type: none"> -Update Quarterly using the Audit Tracking Matrix 3) Report Quarterly to Finance and Ops Committee 	<p>Audit Tracking Matrix is in place and includes implementation status, progress and dates.</p> <p>The Matrix is designed to track Internal Audit signoff.</p> <p>Draft of the Audit Plan is being reviewed.</p> <p>Reporting to Finance and Ops Committee has been implemented.</p> <p>All findings are reviewed weekly and the progress noted.</p>
1E	Connect for Health Colorado should improve its controls over procurement, spending, contracting, and grants management by - Implementing methods to ensure that the Board, management, and staff are trained on new policies, procedures, and contract terms.	<ol style="list-style-type: none"> 1) Create Training in the LMS 2) Provide initial training 3) Implement annual training schedule 4) Annual update and review of financial policies to the board, provide review of the boards responsibilities 5) Training modules <ul style="list-style-type: none"> - Contract Management - Procurement 6) Period Contract updates to Staff with contract responsibilities 	<p>Evaluating the use of the LMS to distribute and administer training to staff. Analysis is in process to determine the form of training needed that best fits the subject matter and audience.</p> <p>Training on the expanded use of LMS is in process.</p>

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2A	Connect for Health Colorado should improve its processes for tracking and analyzing appeals and complaints, and resolving them in a timely manner by - Ensuring staff follow the procedures for entering appeals information into its database and submitting cases to the Office of Administrative Courts by implementing supervisory review of data.	<ol style="list-style-type: none"> 1) Revise process documentation 2) Provide training 3) Monthly meetings 4) Periodic Review of Cases to verify compliance 	<p>Appeals:</p> <ul style="list-style-type: none"> - Process documentation is being reviewed and updated as necessary. - Updates to process documentation will be complete and training will begin on updates on 10/16/2017. - Periodic case review will begin on 11/1/2017. The review will initially be scheduled quarterly, but we will reevaluate that frequency as needed. <p>Complaints:</p> <ul style="list-style-type: none"> - Procedures are drafted and in the review process.
2B	Connect for Health Colorado should improve its processes for tracking and analyzing appeals and complaints, and resolving them in a timely manner by - Establishing and implementing processes for reporting timeliness of appeals to the Board.	<ol style="list-style-type: none"> 1) Create appeals reporting with the board of directors 	Currently researching which information will inform the board in a meaningful way and also researching the best way to report that information to the board.
2C	Connect for Health Colorado should improve its processes for tracking and analyzing appeals and complaints, and resolving them in a timely manner by - Establishing and implementing methods to prioritize appeals to meet timeliness standards, and filling open appeals staff positions.	<ol style="list-style-type: none"> 1) Review existing prioritization process 2) Make changes to meet timeliness standards 3) Analyze staffing resources 	Process documentation is being reviewed and updated as necessary. Updates to process documentation will be complete by 10/16/2017. The team is working on clearing the back log of appeal cases. Staffing resources are analyzed as often as needed and we will attempt to align with need despite competing budget priorities.
2D	Connect for Health Colorado should improve its processes for tracking and analyzing appeals and complaints, and resolving them in a timely manner by - Implementing a written policy and procedure for complaint processing.	<ol style="list-style-type: none"> 1) Create written complaint policy 2) Create written complaint procedures for processing <ul style="list-style-type: none"> -Definitions -Provisions for logging, tracking and monitoring complaints E2E -Anticipated process and timelines for resolution 3) Incorporate complaint processing into existing escalation procedures in SC 4) Regular reporting to the Board of Directors 	Procedures are drafted and in the review process they included definitions, provision for logging, tracking and monitoring complaints E2E.
2E	Connect for Health Colorado should improve its processes for tracking and analyzing appeals and complaints, and resolving them in a timely manner by- Updating its website to make complaint filing information easier to find and provide accurate instructions on how customers may file complaints.	<ol style="list-style-type: none"> 1) Update website <ul style="list-style-type: none"> - Easier to find, Easier to use - How to file a complaint 2) Create content on the website to include <ul style="list-style-type: none"> - Definitions - Descriptions of complaint submission - Anticipated process - Timeline for resolution 	Designs for the website are in process.