

Compliance Update

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Seven Areas of Compliance

- 1. Policies & Procedures**
- 2. Compliance Structure**
- 3. Training & Education**
- 4. Effective Communication Channels**
- 5. Monitoring & Auditing**
- 6. Enforcement**
- 7. Response & Corrective Action**

Compliance Program Update Q1

1. Policies & Procedures

- Continued policy and procedure alignment work tied to the following:
 - ARC AMPE,
 - Eligibility & Enrollment,
 - Modernization efforts
 - Privacy

5. Monitoring & Auditing

- Completed programmatic audit.
- Completed Cascade Care Savings audit.
- Continued IPPTA participation, documentation and response support as Phase 2 activities progressed.
- Prior year issuer audits.
- Notice of Benefit & Payment Parameters review

3. Training & Education

- Spring Cleaning
- Records Management

4. Effective Communication Channels

- Maintained compliance inbox and escalation triage, including coordination with Enrollment, Eligibility, and external partners.

Compliance Program Plan Q2

1. Policies & Procedures

- Support policy updates driven by federal requirements.
- Support policy and program activities that promote holistic federal response to marketplace changes to reduce customer impact and continue accuracy.

5. Monitoring & Auditing

- Continue IPPTA Phase 2 activities.
- Ongoing prior year issuer audit resolution and documentation improvements.
- Prepare for increased federal reporting expectations – including SMART related activities and audit readiness.

4. Effective Communication Channels

Finalize Q2–Q3 prioritization and capacity planning.

- Focus on pivoting as organizational directives for the federal policy environment shifts over the coming year.



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