



**Washington Health Benefit Exchange
Audit & Compliance Committee
Meeting Minutes
Thursday, April 20, 2023
1:00pm – 2:38pm
Teams Meeting**

Audit & Compliance Committee Members Present:

Don Conant, Chair
Maureen McLaughlin

Audit & Compliance Committee Members Absent:

Hiroshi Nakano

Washington Health Benefit Exchange (WAHBE or Exchange) Staff Present:

Ingrid Ulrey, Chief Executive Officer	David Sorrell, Chief Information Officer
Leah Hole-Marshall, General Counsel and Chief Strategist	Joanna Donbeck, Compliance Officer
Jim Crawford, Transition Advisor	Carly Christiansen, Board Coordinator

Welcome and Introductions

Don Conant called the Committee meeting to order at 1:05pm.

Approval of January 19, 2023 Audit & Compliance Committee Meeting Minutes

The January 19, 2023 meeting minutes were approved as presented.

Programmatic Audit Exit Conference – Joanna Donbeck, Compliance Officer; Vanessa Maybury, PMP, CFE, Manager, BerryDunn; Bill Brown, CPA, CFE, Principal, BerryDunn; Elliott Simpson, Senior Consultant, BerryDunn

Bill Brown and Vanessa Maybury with BerryDunn reported on the results of the FY2022 Programmatic Audit. Bill noted that all State Based Market Places (SBMs) are required to have programmatic and financial audits and that the Centers for Medicare and Medicaid Services (CMS) provides suggestions on how to conduct the audits. For the programmatic audit, CMS suggests three types of reviews: document review of training, policies, consumer notices, etc.; Interviews; and testing of data to review for accuracy of eligibility, enrollment, and to validate proper processing. The sample of consumer data focused on qualified health plans (QHPS) and did not include samples of those with Medicaid as this population was not considered a significant risk due to pandemic-related flexibilities creating Medicaid continuous enrollment for these customers. It was reported that there were no findings were identified for the FY2022 Programmatic Audit.

Security & Risk Update - Ruchi Shewaramani, Chief Information Security Officer

Ruchi Shewaramani reported on recent IT activities noting that most IT vacancies had been filled and that all position descriptions had been reviewed to align with the market and had clear roles and responsibilities. Additionally, some positions were converted to consultants to make sure ongoing work was able to continue. Ruchi also reported that the IT Team continued to streamline and update its security posture and were conducting routine access reviews and certifications, as well as evaluating new and current products to ensure they are sufficient for current and future needs.

Ruchi noted that last year the IT department had conducted several assessments and had found areas for improvement. This year the IT Team is working across departments to implement solutions and continue to monitor risk. Ruchi added that several of the findings that came out of the assessment were related to staffing issues and that teams continue to meet to prioritize work and resolve outstanding impacts.

General Compliance Update – Joanna Donbeck, Compliance Officer; James Brackett, Compliance Manager

Joanna Donbeck began her report by noting that pre-audit activities of Cascade Care Savings (CCS) program had been conducted and that she planned to provide an update on results at the next Audit & Compliance Committee meeting in July. Joanna reminded Committee Members that this was not an audit, but a readiness exercise to prepare for the required audit, which would occur later in the year,

Joanna also reported that the recommendations identified in the recent Privacy Assessment were being implemented.

General Counsel Update - Leah Hole-Marshall, General Counsel and Chief Strategist

Leah Hole-Marshall provided a high level update on a recent security incident involving the Exchange's print vendor. Leah reported the Exchange had reported the incident to CMS, as required and there was currently no indication that the Exchange's data was accessed, although the Exchange was waiting for the conclusion of the investigation.

Committee Members had questions regarding the investigation, the possibility of continued vulnerability, and next steps in working with the vendor. Leah noted the investigation was being conducted by a third party vendor and that there was not currently a timeframe for its conclusion. Leah reported that the Exchange had disconnected with the vendor and all partners to conduct an internal review. The review did not find a threat and was able to reconnect with all partners, apart from the print vendor. Leah added that the Exchange was working on interim plans so that customer notices could continue to go out.

Public Comment

No public comment was provided.

Adjourn

Don Conant adjourned the meeting at 2:38pm.

