

Exchange Audit & Compliance Committee Meeting

April 17, 2025

Meeting will begin at 11:00 a.m.

Exchange Mission

The Washington Health Benefit Exchange seeks to redefine people's experience with health care. Our mission is to radically improve how Washington residents secure health insurance through innovative and practical solutions, an easy-to-use customer experience, our values of integrity, respect, equity and transparency, and by providing undeniable value to the health care community.

Our Objectives:

- Increase access to affordable health plans
- Organize a transparent and accountable insurance market to facilitate consumer choice
- Provide an efficient, accurate, and customer-friendly eligibility determination process
- Enhance health plan competition on value: price, access, quality, service, and innovation

Agenda

TIME	TOPIC
11:00	Welcome and Introductions
11:03	Approval of October 9, 2024 Meeting Minutes
11:05	Programmatic Audit Report
11:15	Financial Audit Report
11:30	General Counsel Update
11:40	Public Comment
11:45	Security & Risk Update
11:55	General Compliance Update
12:00	Adjourn



Programmatic Audit Report

Exchange Audit & Compliance Committee Meeting

April 17, 2024



Financial Audit Report

Exchange Audit & Compliance Committee Meeting

April 17, 2024



General Counsel Report

Exchange Audit & Compliance Committee Meeting

April 17, 2024

Leah Hole-Marshall, General Counsel and Chief Strategist

Public Comment





Security & Risk Update

Exchange Audit & Compliance Committee Meeting

April 17, 2024

Ruchi Shewaramani, Chief Information Security Officer



General Compliance Update

Exchange Audit & Compliance Committee Meeting

April 17, 2024

Dan Gonzalez, Compliance Officer

Compliance Workplan Update – Seven Key Elements

In progress
 ✓ Completed

Seven Key Elements	Progress Update	2025 Rating
Policies and Procedures	<ul style="list-style-type: none"> Transition dept policies/procedures to organizational, if appropriate Update expired policies and procedures across departments Policy and Procedure Workgroup providing oversight and driving policy and procedure development 	3
Training and Education	<ul style="list-style-type: none"> Workgroup created to evaluate and provide recommendations to improve organization wide training 	3
Governance and Oversight	<ul style="list-style-type: none"> Evaluating new Governance Risk and Compliance tools in partnership with Risk and Security 	3
Monitoring and Auditing	<ul style="list-style-type: none"> Programmatic Audit (2025) ✓ CCS Audit ✓ IRS Audit ✓ Financial Audit ✓ GAO Survey ✓ Prior Year Audits – 2018 (4 issuer audits) ✓ Privacy Impact Assessment 9 Prior Year Issuer Audits for 2019 and 2020 – in process Exchange Improper Payments Act Pre-Testing – starts January 2025 	4
Enforcement	<ul style="list-style-type: none"> CCS Corrective Action Plans (Data Integrity Checker Workplan developed) Broker activity in violation of user agreement or data security requirements 	3
Effective Lines of Communication	<ul style="list-style-type: none"> Improve tracking of compliance-related metrics Continuous improvement related to program-specific support (e.g. broker, navigator, enrollment, eligibility, appeals etc.) 	4
Incident Response	<ul style="list-style-type: none"> Participating in Continuous Operations Planning, Incident Response, and Disaster Recovery projects lead by third party auditors 	3

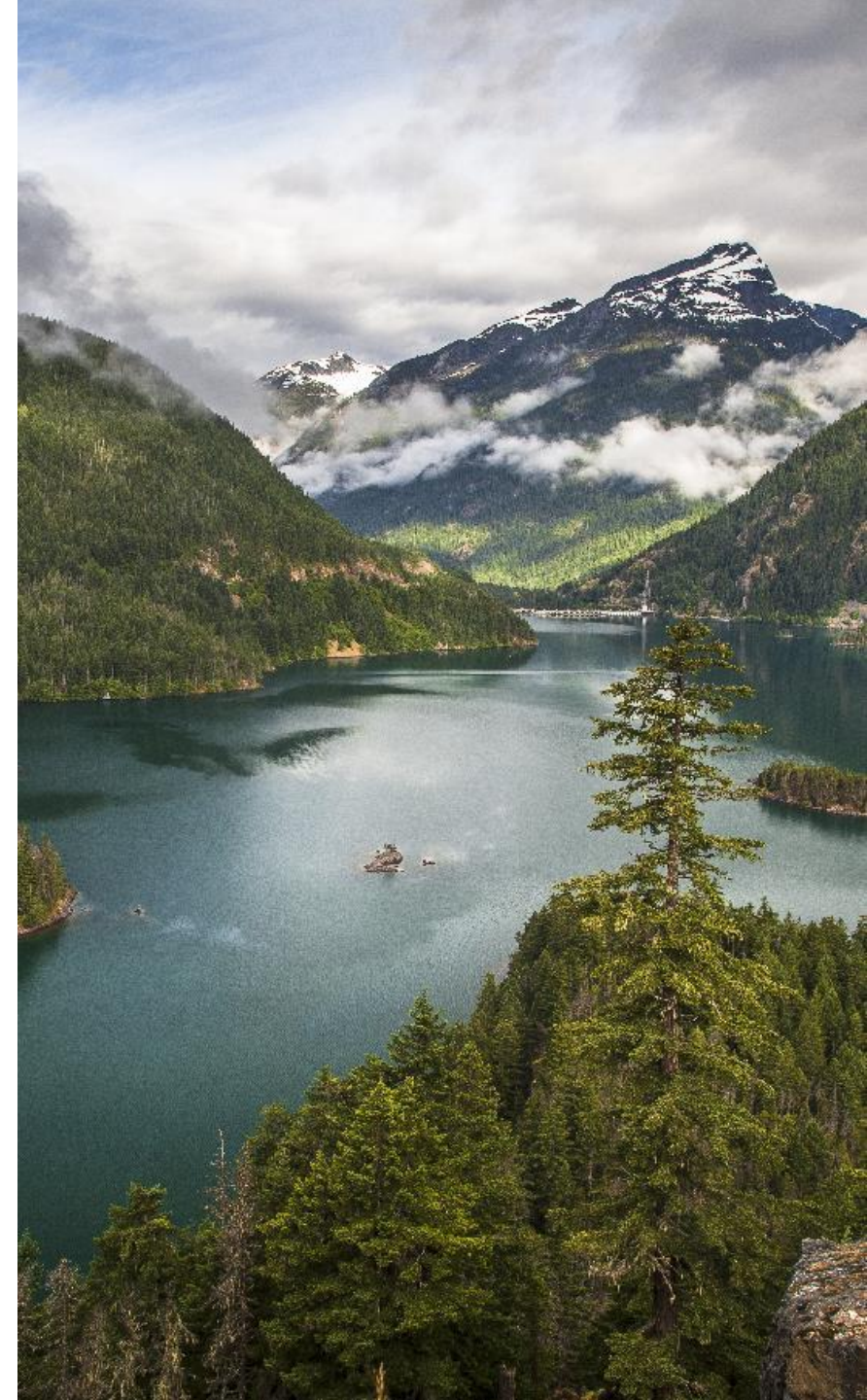
Compliance Program Q1 and Q2

Compliance Program Update

- Spring Cleaning Phase II: maturing document retention practices
- Policy and Procedure Workgroup is used appropriately by the organization
- Compliance Department will use ticketing system to investigate and propose Key Performance Indicators (KPI's)
- Enhance monitoring activities by leveraging compliance ticketing system to track work and collaborate with Risk and Security on shared work

Compliance Initiatives Update

- Spring Cleaning II: Primary focus is identifying old and duplicate records to teams for evaluation



Adjournment

Next Meeting: July 17, 2025

