



MNsure®

Where you choose health coverage

MNsure Annual Report 2015

January 15, 2016

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Cost of Report Preparation

The total cost for MNsure to prepare this report is approximately \$1,575. These costs include staff time in compiling and analyzing data and in preparing the written report. Incidental costs include printing, copying and other office supplies, and are not included in this estimate.

Estimated costs are provided in accordance with Minnesota Statutes, section 3.197, which requires that the cost of preparing a required report must be provided at the beginning of all reports to the legislature.

Table of Contents

MNSure Mission and Vision.....	4
Executive Summary	4
Statutory Requirements.....	4
Continuing to Meet Our Mission	4
Ongoing IT Systemic Strength.....	4
Increasing Premiums Highlight Need for MNSure	5
Focus on Accountability and Transparency Remains Key	5
Enrollment Snapshot.....	5
2016 Open Enrollment	5
Organizational Leadership	6
Continuous Improvements to the Consumer Experience.....	8
Contact Center Focus	8
Website Strength and Enhanced Functionality	9
Partnership with Consumers' Checkbook	12
Improving and Strengthening Partner Relations	12
Certification and Support for Partners	12
Broker Support.....	12
Broker Enrollment Center Initiative (BECI) Expansion	13
Navigator and Certified Application Counselor (CAC) Support	14
Strengthening the Outreach and Enrollment Grants Program.....	14
Assister Portal Pilot	15
Contacts with Consumers	16
Advertising	16
Outreach	17
Digital/Social Media.....	17
MNSure Business Operations.....	17
Policy & Plan Management, Eligibility & Enrollment, Program Management Office	17
Small Business Healthcare Options Program (SHOP).....	18
Finance and Administrative	19
Legal and Compliance.....	19
Conclusion	23

MNsure Mission and Vision

Mission: To ensure all Minnesotans have the security of health insurance.

Vision: To create a statewide resource that provides access to private health insurance and public medical assistance programs.

Executive Summary

Statutory Requirements

Minn. Stat. §62V.08 (a) requires MNsure to submit an annual report to the legislature by January 15 of each year beginning January 15, 2015, on (1) the performance of MNsure operations; (2) meeting MNsure responsibilities; (3) an accounting of MNsure budget activities; (4) practices and procedures that have been implemented to ensure compliance with data practices laws, and a description of any violations of data practices laws or procedures; and (5) the effectiveness of the outreach and implementation activities of MNsure in reducing the rate of uninsurance.

This second annual report satisfies the above statutory requirements and provides an overview of MNsure's three-year existence with summaries of the budget, operations and strategic vision MNsure has employed to meet its responsibilities under the law to reduce the uninsured rate in Minnesota.

Continuing to Meet Our Mission

MNsure has and continues to meet its mission and responsibilities under the law. MNsure's mission is to help every Minnesotan obtain affordable, quality health insurance. According to an independent report produced by the University of Minnesota State Health Access Data Assistance Center (SHADAC) titled "Early Impacts of the Affordable Care Act on Health Insurance Coverage in Minnesota," implementation of MNsure and the Affordable Care Act in Minnesota led to a 40 percent drop in the number of uninsured. All plans sold on MNsure include free preventive care, and prescription drugs and hospitalization are covered.

Ongoing IT Systemic Strength

Based upon the recommendations following an exhaustive review of the IT platform at the end of the first open enrollment, MNsure, the Minnesota Department of Human Services (DHS) and MN.IT identified system flaws, prioritized the list of needed improvements, implemented a new governance structure and made a number of system improvements. MNsure consumers saw a greatly improved IT system operating faster and more consistently during the second and third open enrollment periods.

Increasing Premiums Highlight Need for MNSure

As premium increases from insurance companies (carriers) continue, it becomes more important each year for Minnesotans to examine all their health insurance options and shop through MNSure to find the best option for them and their family. MNSure remains the only place Minnesotans can shop to take advantage of financial help, including federal tax credits and other cost sharing reductions, which can provide a real financial savings to the consumer. In 2015 alone, consumers received a total of nearly \$50 million in federal tax credits by shopping through MNSure. That total is an increase from approximately \$30 million in 2014.

Focus on Accountability and Transparency Remains Key

MNSure continues to meet its mission and to make a difference in the lives of Minnesotans. The MNSure website is safe, secure and successful. More Minnesotans than ever before are now insured. As MNSure works to continue to meet its mission, transparency, accountability and a continued focus on the consumer are its guiding principles.

Currently, MNSure is in its third open enrollment period, which began on November 1, 2015, and will end on January 31, 2016. The open enrollment launch on November 1, 2015, was a success. Following several months of measurable IT functionality development completed by MN.IT Services, MNSure was operationally ready to meet increased consumer demands on day one of open enrollment. MNSure has been focused on the consumer experience. During the first two months of open enrollment, November and December 2015, the Contact Center received 184,432 calls. On December 28 alone (the deadline for January 1 coverage), there were more than 20,000 calls received. More than 12,500 people enrolled in commercial insurance for 2016 through December 1, 2015. This is in contrast to less than 6,000 people who enrolled in commercial insurance for 2015 through December 1, 2014.

Enrollment Snapshot

2015 Open Enrollment

MNSure's second open enrollment period saw an increasing number of Minnesotans enroll in coverage via MNSure. At the end of the open enrollment period on February 15, 2015, MNSure had enrolled 60,092 Minnesotans in qualified health plans, as well as 26,891 in MinnesotaCare, 72,017 in Medical Assistance and 7,674 in qualified dental plans. By October 31, 2015—just prior to the start of MNSure's third open enrollment period—these numbers had increased to 73,057 enrollments in qualified health plans, 73,789 MinnesotaCare enrollments, 275,590 Medical Assistance enrollments, and 9,635 enrollments in qualified dental plans.

Also in 2015, for the first time, a majority of public programs enrollees were housed within the Minnesota Eligibility Technology System (METS), as opposed to the DHS legacy IT systems. As of October 31, 2015, METS held 470,367 Minnesotans enrolled in Medical Assistance (56% of total Medical Assistance enrollees) and 117,176 Minnesotans enrolled in MinnesotaCare (100% of total MinnesotaCare enrollees).

2016 Open Enrollment

When MNSure's third open enrollment period began on November 1, 2015, the MNSure system and the staff was ready to serve consumers. Between November 1, 2015, and January 10, 2016, MNSure has enrolled 69,671 Minnesotans in a qualified health plan. In addition, 19,415 Minnesotans have enrolled in MinnesotaCare, 45,192 in Medical Assistance and 5,876 in a qualified dental plan since November 1.

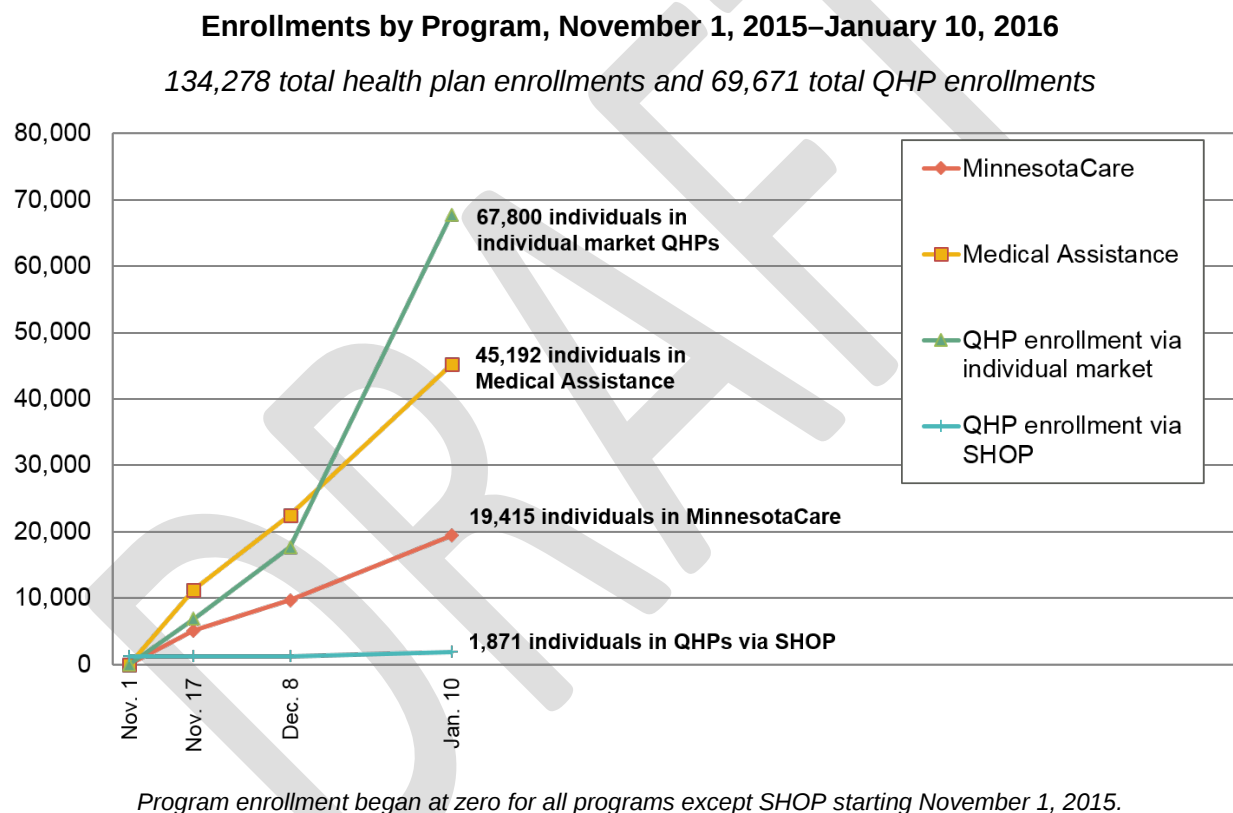


Chart 1: Enrollments as of January 10, 2016

Organizational Leadership

MNSure leadership has undergone several changes since the organization's inception and the rollout in the fall of 2013. These changes, bringing in individuals with different skills and abilities, have allowed MNSure to continue to grow by harnessing the knowledge and experience of skilled leaders in health care policy, finance, planning and operations.

In November 2015, after a rigorous nationwide selection process, the MNsire board of directors announced the appointment of Allison O'Toole as chief executive officer. Prior to being named CEO, Allison O'Toole served as interim CEO and before that, deputy director for external affairs overseeing MNsire's public-facing departments and helping lead MNsire's efforts for greater public accountability and transparency.

Chart 2 shows the current organization chart of leaders and directors of the organization.

MNsire Leadership

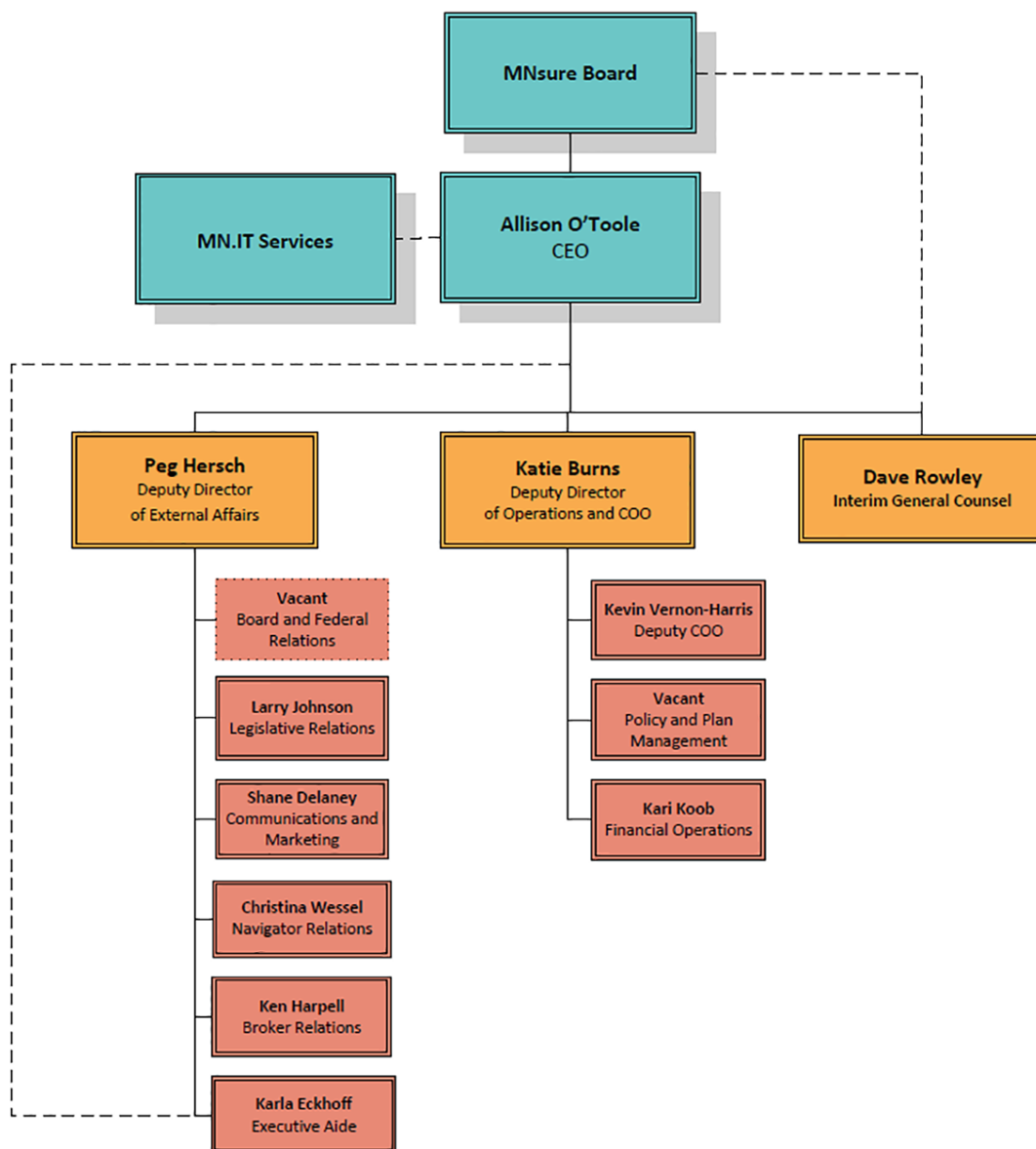


Chart 2: MNsire leadership

Continuous Improvements to the Consumer Experience

In the months preceding the second open enrollment period, efforts were targeted at making the consumer-facing or “front end” operations more user-friendly so consumers could more easily search for and enroll in plans that best meet their needs and budget. Since that time, leadership representatives of MNSure, MN.IT Services and DHS have worked together as an “executive steering committee” to review and prioritize IT development and releases of new website functionality. These upgrades have been both on the consumer-facing side as well as on the “back end,” resulting in improved interaction between MNSure and health/dental insurance companies and delivery of enrollment data on a consistent and usable basis.

Contact Center Focus

Following the end of the first open enrollment, MNSure leadership made improving the consumer experience a hallmark of operations growth and focus. To that end, additional Contact Center staff was hired and a detailed training module was launched to give Contact Center employees better information to address consumers’ concerns. These investments led to fewer follow-up calls and an improvement in consumer satisfaction overall.

Continued Customer Service Concentration

Since January 2014, MNSure has built out its customer service operations and now provides a number of ways consumers can receive assistance. For many consumers, the MNSure Contact Center toll-free hotline is their first stop and only contact with MNSure staff. Many times this single call can address and correct their issue. Additional trained staff has been hired by the Contact Center resulting in more consumers who are able to get questions answered and fewer people are sitting on hold without assistance. The following chart shows the number of calls coming into MNSure during calendar year 2015. Despite spikes in call volumes, call wait times remain very low except on and around deadline dates.

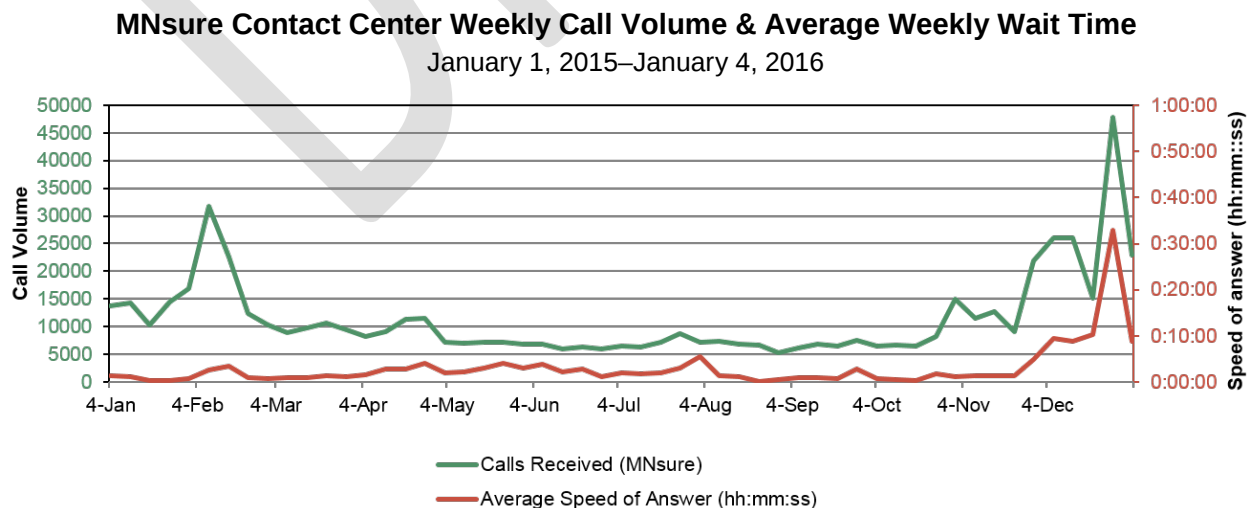


Chart 3: Contact Center volume

MNSure's customer service online has also expanded since the first open enrollment period. Dedicated digital media staff is available to respond to inquiries via Twitter and Facebook as well as answering comments and concerns from the general customer service email inbox. For many consumers, interaction through digital media has produced quick, real-time assistance.

Website Strength and Enhanced Functionality

The MNSure system has seen vast improvements in terms of system stability since the kickoff of the 2014 open enrollment period. Minnesotans are now able to access MNSure.org without many of the problems or errors they may have experienced during the first open enrollment period. During the 2016 open enrollment period, METS has been stable and is performing well, and the MNSure website is successfully handling a steady flow of visitors and account registrations.

Between the end of the second open enrollment and the beginning of the third open enrollment period, MNSure staff, in connection with MN.IT Services completed a nine-month IT build following recommendations to address problem areas on the website. Charts 4 and 5 on the following pages show the progress made between April 2015 (Chart 4) and December 2015 (Chart 5) and plans for further work in 2016. As of December 2015, MNSure had 47 completed projects, a significant increase from seven completed in April.

In creating the overall METS plan for 2015, MN.IT, MNSure and DHS engaged key stakeholder groups, including counties, insurance companies and assisters (brokers/navigators). Input on stakeholder priorities for IT system improvements was obtained and helped shape the 2015 IT plan, which included work that addressed county requests and input.

Additionally, a county representative is a member of the METS executive steering committee, which provided governance and leadership for the METS IT build. County employees were active team members on a number of 2015 METS projects designed to improve functionality for eligibility workers. MN.IT provided updates and engaged in dialogue at monthly county advisory committee meetings; input from those meetings was shared with project team members to help guide project management decisions. DHS representatives have "shadowed" county workers to directly observe the worker experience with METS and to bring real-life observations back to project teams to plan future METS enhancements.

Looking ahead, ongoing development of the 2016 METS roadmap again reflects input from MNSure, DHS, counties and other key stakeholder groups, and will address functionality improvements desired by these partners.

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April 2015 Release Plan Project Status

March	April off-cycle release	May	July	Sept.	Dec.
Federal Hub Service Upgrade (VLP)	Enrollment data to carriers (Phase 1 – EDI transaction) Previously scheduled for May	Life Event Entry Phase 1 (1 of 6 high priority items)	Security Enhancements (Multi-Factor Authentication) –Pilot	QHP Renewals and Open Enrollment	PRISM Interface
Public Programs Renewal Functionality (415)		Caseworker functionality simplification - Phase 1 (task management)	Life Event Entry Phase 2 (5 remaining high priority items)	Improvements to client eligibility processing (Effective dates) Phase 2	Reporting Functionality Phase 2
41 System Defect Fixes		Enrollment data to carriers (Phase 1 – EDI transaction)	Caseworker functionality simplification Phase 2 (task management/UI simplification)	Security Enhancement Multi-Factor Authentication full implementation	Usability Enhancements Phase 2
Eligibility System of Record Fixes 14		Enhanced MA Renewal Functionality	Improvements to client eligibility processing (Effective dates) Phase 1	Citizen/Worker Integration Phase 1	Navigator/Broker Portal Phase 2
Finance Fixes (5) EP		Eligibility Software Product Upgrade	MinnesotaCare Payment Processing	Notices – Limited Denial/Termination	Citizen Worker Portal Phase 2
Cost-Effective determination logic change		System Defects	MA and BHP Renewals Processing Functionality Phase 2	Usability Enhancements Phase 1	Special Enrollment
Case generation functionality fix-Product Development Case			Enrollment System of Record Phase 2	Reporting Functionality Phase 1	
				MNsire MMIS Interface Functionality	
				Navigator/Broker Portal Phase 1	

Work completed

Work currently underway

Work in planning phase

Work scheduled for scoping/planning

Chart 4: 2015 project release plan as of April 2015

2015 Release Plan Project Status—FINAL

March	April off-cycle release	May → June	July → Aug.	Sept. → Oct.	Dec.
Federal Hub Service Upgrade (VLP)	Enrollment data to carriers Phase 1 Previously scheduled for May	Streamlined Life Events - "Add Coverage"	Streamlined Life Events - "Add Coverage" - "Add Household Member" - "Remove Household Member"	QHP Renewals and Open Enrollment (#1)	PRISM Interface - New Functionality Phase 1 and 2 (#55)
Public Programs Renewal Functionality		Caseworker functionality simplification Phase 1 (task management)		2016 Shopping Readiness – Carrier Preview (#82)	Reporting Functionality Phase 2 (#15)
System Defect Fixes		Enrollment data to carriers Phase 2	Caseworker functionality simplification Phase 2 (task management/UI simplification)	Security Enhancement: Multi-Factor Authentication – Pilot Phase 2 (#3)	True Up, Effectuation, 834 EDI production, 1095 electronic files, ESOR GUI (#98)
Enrollment System of Record Fixes		Enhanced MA and BHP Renewal Functionality Phase 1	Enrollment data to carriers Phases 2 & 3	Enrollment data to carriers – 834 (#98)	Renewals (#63)
Finance System Fixes		Eligibility Software Product Upgrade (IBM 6.0.5.7)	Enhanced MA and BHP Renewal Functionality Phase 2	Usability Enhancements Phase 2 (#14)	MinnesotaCare Invoice & Payment Tracking Phase 1 (#61)
Cost-Effective determination logic change		System Defect Fixes	Usability Enhancements Phase 1	Reporting Functionality Phase 1 (#15)	Security Enhancement: Multi-Factor Authentication (#62)
Case generation functionality fix-Product Development Case			Safe at Home	MNsure MMIS Interface Functionality (#17)	Citizen/Worker Portal Integration Phase 1 (#4)
			System Defect Fixes	Assister Portal Phase 1 (#21)	Infrastructure Improvements Phase 2 (#22)
			Security Enhancement: Multi-Factor Authentication – Pilot Phase 1	Infrastructure Improvements Phase 1 (#22)	Infrastructure Improvements Phase 2 (#22)
			BHP Premium Rate Increase	System Defect Fixes	Notices – Limited Denial (#86)
			MNsure MMIS Interface Functionality Package		Assister Portal Phase 2 (#58)
					Usability Enhancements Phase 3 (#57)
					Caseworker Functionality simplification (task management) (#81)
					IRS 1095B (#66)
					MNsure MMIS Interface Functionality (#17)
					Change Wizards – defect fixes (#93)

Work completed

Work currently underway

Chart 5: 2015 project release plan as of December 2015

Partnership with Consumers' Checkbook

In mid-August, MNSure announced a partnership with Consumers' Checkbook to create an online plan comparison tool to help Minnesotans get a more complete picture of their total health insurance costs and help them choose their best plan options.

Consumers' Checkbook has developed plan comparison tools for both the individual market and Small Business Health Options Program (SHOP) offered through MNSure. The new tools help educate consumers to make decisions that are more informed on the health plan that best fits their needs and budget. The cost-comparison function provides valuable decision-support information for consumers by evaluating not just premiums and deductible amounts, but estimated out-of-pocket costs based on health status and expected use of medical services as they compare and shop for qualified health plans on MNSure.

Improving and Strengthening Partner Relations

MNSure is focused on further growing two-way communication with its partners. MNSure staff meets with stakeholder groups regularly to share ideas and receive feedback from partners in the field. This collaboration is critical as MNSure continues to improve and grow in the third open enrollment period.

Certification and Support for Partners

The Consumer Assistance program (CAP) certifies and monitors MNSure's assisters, which are navigators, agents, brokers and certified application counselors (CACs).

Certification involves system training and data privacy training. Navigators and CACs must also pass a background study. More than 200 navigator and CAC organizations representing more than 900 individuals are contracted to provide application and enrollment assistance, along with more than 900 licensed agents and brokers. A new core curriculum was developed for the 2015 open enrollment to provide assisters with a more comprehensive understanding.

Broker Support

Specific outreach and operational upgrades have been made to accommodate insurance agents and brokers. MNSure has engaged in ongoing dialogue and communication around best practices, new procedures and suggestions for improvement. MNSure staff meets monthly with a broker stakeholder group to discuss the steps MNSure is taking to enhance the consumer, broker and enrollment experience.

MNSure has developed an interactive website that includes agency self-service, a calendar of events and useful information, and has built out a specialized customer-service broker team. Fourteen experienced Contact Center staff members serve brokers directly with enhanced certification support, streamlined access to client status, direct access to manual enrollments and renewals on behalf of clients. Brokers can provide feedback and ask questions via brokers@mnsure.org. Questions are reviewed, answered and made available on the website.

MNSure has also convened five agent/broker forums in key locations throughout the state to answer questions and address the improvements made for the 2016 open enrollment period by MNSure.

Broker Enrollment Center Initiative (BECI) Expansion

In July, MNSure announced the selection of twenty health insurance agencies located across Minnesota to serve as MNSure broker enrollment centers during the 2016 open enrollment period.

This announcement followed the success of a pilot project during the 2015 open enrollment period. During the pilot program, six broker enrollment centers enrolled more than 1,700 Minnesotans into private health insurance plans through MNSure. Each of these six agencies saw their 2015 MNSure enrollments grow by as much as 22 times over their 2014 MNSure enrollments.

The selected agencies provide and staff convenient walk-in sites for residents of surrounding communities. Face-to-face assistance from MNSure-certified agents, brokers and navigators is available to consumers as well. Selected sites combined marketing efforts to encourage Minnesotans to visit the walk-in sites throughout the open enrollment period.

The agencies include:

- The Longtin Agency, Inc. – Crookston, MN
- Benes Insurance Services – Duluth, MN
- Jenifer Ivanca Insurance – Chisholm, MN
- Breitenfeldt Group – Perham, MN
- Midstate Insurance Services, Inc. – Wadena, MN
- Strong Insurance Services DBA RG Insurance – Baxter, MN
- Health Insurance Services, Inc. – Wilmar, MN
- Breitenfeldt Group – Waite Park, MN
- Sjoberg & Holmstrom, LLC – Mora, MN
- United Prairie Insurance Agency – Mankato, MN
- AdvisorNet Financial – Austin, MN
- Alexander & Haberman Agency LLC – Bloomington, MN
- American Senior Benefits – Maple Grove, MN
- Breitenfeldt Group – Maple Grove, MN
- Individual & Corporate Needs Agency, Inc. – Roseville, MN
- LeClair Group – Woodbury, MN
- Legacy Benefit Consultants – Waconia, MN
- Nyquist Fantastic Alliance/NFA – Bloomington, MN
- Shawnee Christianson LLC, DBA Crosstown Ins. – Minneapolis, MN
- Tonka Financial Services – Minnetonka, MN

Navigator and Certified Application Counselor (CAC) Support

MNSure continues to increase support for navigators and CACs as well. This includes providing improved certification training, opportunities for navigators/CACs to connect with each other, regular opportunities to ask questions directly of MNSure and DHS staff, and continued support by the assister resource center. All navigators and CACs seeking certification or recertification took MNSure's core curriculum. The core curriculum is a new series of training modules developed to ensure that MNSure partners have the information and skills to deliver the best customer service possible to individuals seeking assistance with the application and enrollment. The next step in enhanced training is a role-specific curriculum, which will dive deeper into the application and enrollment process and will be deployed in 2016.

Leading up to open enrollment, MNSure coordinated a series of opportunities for navigators, CACs, agents and brokers to meet each other in their communities. These events provided a space for assisters to better understand one another and their respective roles, and to form mutually beneficial relationships ahead of open enrollment. MNSure hosts statewide navigator/CAC conference calls every month where navigators and CACs have the opportunity to hear important updates from MNSure and DHS staff and ask questions. MNSure staff also meets monthly with a navigator stakeholder group and a CAC stakeholder group to discuss the steps MNSure is taking to enhance the consumer and assister experience. The assister resource center (ARC) provides navigators and CACs with dedicated staff to support needs around contracting, certification, payments, consumer applications and enrollments.

Strengthening the Outreach and Enrollment Grants Program

CAP coordinates the outreach and enrollment grant program, a competitive grant program that supports the outreach and enrollment work of community partners, focusing on underserved populations. Approximately \$4.2 million in grants were awarded to fund outreach and enrollment efforts from July 1, 2015, until June 30, 2016. Grantees were chosen through a selection process that included a diverse team of internal and external reviewers, and were categorized into one of three funding areas: navigator network grants, outreach and enrollment grants and outreach and education mini grants.

Navigator network grants are dedicated to collaborative networks of highly skilled navigator organizations focused on enrollment, outreach and building geographic coverage and coordination.

Outreach and enrollment grants are awarded to navigator organizations with expertise in reaching a specific population with high levels of uninsured, focused on outreach, education and enrollment.

Outreach and education mini grants are directed toward supporting outreach and education activities that connect consumers or small businesses to enrollment assistance, focused on reaching consumers facing particular barriers.

The 26 MNSure grants fund 79 different organizations.

Assister Portal Pilot

In October 2015, MNSure deployed an assister portal that will provide our assisters with enhanced capacity to help consumers with the process of applying and enrolling in health and dental insurance coverage.

The assister portal was one of the top priority technology initiatives for 2015. MNSure, DHS and MN.IT Services made a serious commitment of resources over the last several months to design and implement the first phase of an assister portal prior to the open enrollment period. The development phase incorporated valuable input from stakeholders in the agent, broker, navigator and CAC communities.

The assister portal represents a significant step forward in developing an environment where assisters can provide MNSure consumers with a more robust customer service experience.

Features of the Assister Portal

The essential feature of the assister portal is to allow consumers to authorize an agent, broker, navigator or CAC to apply and enroll on their behalf. To create this functionality, MNSure is using an out-of-the-box portal solution that provides seamless access to submitting an application on behalf of a consumer. The assister portal also integrates across MNSure's other IT systems, such as identity management and qualified health plan enrollment processes.

The key elements of the assister portal include:

- A new “manage assister” feature in the consumer's online account that enables them to authorize an assister, view assister details and change or remove an assister at any time.
- A dashboard where assisters can view their associated consumers and act on their behalf to apply and enroll in health insurance coverage.
- A new MNSure internal resource manager role with authority to create and manage assister accounts.

The assister portal as launched represents a first step towards a more robust tool. A second phase of the portal was deployed in December 2015, which included additional functionality, including selection information appearing on the assister dashboard, the ability for MNSure business operations to disassociate a relationship between an assister and consumer if needed or requested and enhancements to MNSure business operational reporting.

Assister Portal Pilot Program

Developing an environment where our assisters can apply and enroll on behalf of a consumer is a critical step forward for MNSure's consumer assistance program. To support this robust new tool, MNSure is developing new internal and external training, new business processes and thorough policies and procedures to ensure consumers and assisters have a positive experience.

To enable us to develop and test the necessary support structures for this new functionality, MNSure is initially rolling out access to the assister portal as a pilot program that launched in November 2015 and will conclude in January 2016. The goal of the pilot is to assess the

performance and operation of the portal, gather assister and consumer feedback and confirm MNSure's readiness for a full-scale launch.

The assister portal pilot includes a limited number of brokers, navigators and certified application counselors selected from MNSure's stakeholder groups, broker enrollment center Initiative participants, and navigator outreach and enrollment grantees. The pilot participants are receiving training and specialized support from MNSure and are helping assess the portal through regular feedback opportunities with MNSure staff. MNSure will release a public report assessing MNSure's readiness to launch the portal after the pilot concludes.

Contacts with Consumers

Advertising

The 2016 open enrollment advertising campaign contains many elements from the successful campaign in 2015. Much of MNSure's marketing efforts are squarely focused on enrollment, featuring statewide TV and radio ads in addition to billboards and out-of-home placements at transit stops. Image 1 below shows the cover of one of our outreach brochures from the third open enrollment period. MNSure also leveraged digital advertising to reach diverse audiences and focus on affordability and enrollment.

While much focus remains on getting uninsured individuals covered through MNSure, new to the 2016 advertising campaign was a focus on the individual health/dental insurance market, and attracting Minnesotans who already purchase health insurance on their own to check MNSure first. This strategy was driven by two main points:

- Roughly 85% of Minnesota's individual health insurance market currently buys off-exchange, according to the Minnesota Department of Health.
- Insurance premiums in 2016 increased significantly, and MNSure is the only place Minnesotans can go to qualify for financial help such as advanced premium tax credits.



Image 1: Outreach brochure

Outreach

MNSure reaches, educates and enrolls Minnesotans in every corner of the state primarily through its navigator, outreach and enrollment grants and broker enrollment centers. These 96 partners cover every county in the state, employ staff representative of our many diverse communities and provide expert enrollment assistance to both consumers and other assisters. These partners deliver presentations, distribute materials, hold community education events and execute hyperlocal earned media campaigns with MNSure support, guidance and funding.

Beyond the efforts of these two groups of partners, MNSure executed the following outreach strategies in 2015:

- Piloted a consumer-assister referral process.
- Fulfilled more presentation and speaking requests from non-partner external stakeholders.
- Launched MNSureEvents.org to provide consumers a searchable listing of education and enrollment opportunities.
- Developed a communications toolkit and customizable creative marketing pieces for partners.
- Developed a five-module outreach training curriculum for partners.
- Established a partnership with the Minnesota Department of Employment and Economic Development's Dislocated Worker program to offer detailed enrollment information and in-person assistance during rapid response meetings.

Digital/Social Media

A main component of MNSure's communications and marketing strategy is digital outreach. MNSure makes it a priority to respond to questions and issues from Minnesotans via email and social media. In addition, MNSure creates and distributes useful information such as infographics, deadline reminders and enrollment tips for publication on social media channels. Digital outreach also allows MNSure to target messaging to specific audience groups.

MNSure Business Operations

MNSure operations develops and executes the processes for qualified health plan eligibility and enrollment, reporting, plan data transfer, special enrollment periods, the Small Business Health Options Program (SHOP), customer service, compliance and finance.

Policy & Plan Management, Eligibility & Enrollment, Program Management Office

The Policy and Plan Management team is the primary point of contact for health and dental insurance companies offering products on MNSure, with a focus on data reporting, quality control for MNSure products and the consumer shopping experience. This team also works closely with health and dental insurance companies and interagency regulatory colleagues to

ensure MNSure policies are aligned in support of health reform objectives and corresponding operational requirements of our partners.

The Individual Market Eligibility and Enrollment team (IMEE) is responsible for establishing and monitoring the business rules for the eligibility software such that they are consistent with state and federal law. Eligibility and enrollment staff also reviews special enrollment cases.

The Business Project Management Office (BPMO) provides project and portfolio management services to MNSure for the purpose of driving success of MNSure's initiatives and helping MNSure achieve its goals.

Services include:

Portfolio Management:

- Manage stakeholder value dashboard
- Manage program/project intake
- Work with MNSure leadership to prioritize the work of the organization

Program and Project Delivery

- Provide project managers and business system analysts to implement programs and projects
- Administer cross-agency interdependencies
- Establish incentives/systems to deliver projects faster or with higher quality
- Monitor program/project progress
- Provide a central repository for programs/projects
- Build project management skills among MNSure staff

Enterprise-wide Training

- Coordinate enterprise-wide instructional design/training coordination

Small Business Healthcare Options Program (SHOP)

Though many small businesses with 1-50 employees choose to enroll in MNSure SHOP for coverage beginning January 1, 2016, employers are able to enroll in SHOP at any time during the year. Through SHOP, small employers are able to more easily offer affordable, high quality health insurance coverage for their employees. Employers and brokers can compare options from multiple plans and insurance companies, and enrollment is streamlined and convenient. Billing is consolidated so employers pay only one monthly bill. Employers may also be eligible for tax credits available exclusively for qualifying employers who purchase group coverage through SHOP.

In 2015, the SHOP program also began piloting a SHOP lead agency program with four broker agencies in the state, similar to the broker enrollment center initiative for individual consumers. These preferred brokers collaborate with MNSure on SHOP marketing and educational initiatives and are specially trained on SHOP enrollment.

Finance and Administrative

The MNSure finance team is responsible for providing accounting services and financial support to the staff and board of MNSure. Human resources and IT services are performed by staff at DHS via an interagency agreement.

MNSure's budget cycle tracks the state of Minnesota fiscal year. The MNSure board, in collaboration with executive leadership, approves the MNSure budget. In March of 2015, the MNSure board adopted a preliminary FY 2016 budget and a three-year financial plan—covering fiscal year 2015 through the end of fiscal year 2017. The board adopted an updated budget and three-year financial plan in July 2015. These [budget submissions can be found on the MNSure website](https://www.mnsure.org/images/bd-2015-07-20-FY-2016-budget-setting.pdf) (https://www.mnsure.org/images/bd-2015-07-20-FY-2016-budget-setting.pdf)

MNSure has received a total of \$189 million in federal exchange grant funds, making it one of the most affordable state-based marketplaces in the country. In November 2015, the Center for Consumer Information and Insurance Oversight approved a “no-cost extension” for the remaining grant funding to be used by the end of calendar year 2016 for approved activities.

Legal and Compliance

The Legal and Compliance team is responsible for the compliance with all applicable law, rules and regulations, identifies and mitigates organizational risk, reviews contract and procurement, plans and executes internal controls and advises MNSure on legal matters.

Consistent with its oversight and monitoring obligations under state and federal law, MNSure has taken significant steps since its inception to develop and implement a comprehensive compliance program. In December 2014, the MNSure board approved a comprehensive compliance program and roadmap: [MNSure Compliance Program Strategic Plan](http://www.mnsure.org/images/bd-2014-12-17-compliance-program-strategic-plan-final.pdf) (http://www.mnsure.org/images/bd-2014-12-17-compliance-program-strategic-plan-final.pdf). Implementation of the roadmap continues. Notable events in 2015 include the implementation of an anonymous tip line to augment the reporting of fraud, waste and abuse. 2015 also saw the delivery of an agency-wide code of conduct training and certification that was performed in September. In August 2015, a compliance coordinator was hired to help further implement the roadmap.

In 2015, the Legal and Compliance team worked with other MNSure teams to streamline its complaint resolution process by identifying the types of issues and complaints received by the agency and the specific points of contact for the identified issues. This enhanced coordination among business units is intended to provide more efficient and timely customer service by directing consumer issues to the relevant business area with the expertise and resources to resolve the complaint. It will also reduce the number of cases that escalate to appeals by resolving issues within the business units.

Data Practices

MNSure has a responsibility under state and federal law to protect and ensure the privacy of personally identifiable information and other private or nonpublic data. MNSure has established a [comprehensive privacy policy](https://www.mnsure.org/resources/terms-conditions.jsp) (https://www.mnsure.org/resources/terms-conditions.jsp) outlining the collection, use, disposal and sharing of protected information. This policy informs

the public on how their information is used within the agency when they apply for health insurance coverage or otherwise do business with MNSure.

MNSure has also conducted top-to-bottom security reviews to ensure protection of information maintained by the agency in all formats. This security review includes information technology such as encryption and firewalls, audit logging and vulnerability scanning, as well as other types of security controls such as access authorization and management, training compliance and physical storage security. The system is architected to stated business and regulatory requirements with appropriate risk-reducing technical controls that ensure integrity, checks, logging and failover mechanisms.

To ensure compliance with data practices laws and information protection standards for employees and contractors handling private data, MNSure has implemented several internal policies and procedures, in addition to adopting DHS information and technology policies. MNSure employees and contractors are also required to take privacy and security training courses relevant to data practices, information security, physical security, breach and incident reporting and handling sensitive information.

As part of its certification through the Center for Medicaid Services, MNSure has also entered into agreements outlining the procedures and responsibilities for compliance with privacy and security laws and standards. The privacy impact assessment identifies and documents the specific types of sensitive information that is collected, processed and stored by MNSure. This assessment is in conjunction with data inventories for business units and administrative policies.

Privacy and Security Functions

Consent

Anyone supplying information to MNSure as part of an application for eligibility is asked to consent prior to the collection of their private data and shall be informed of: (a) the purpose and intended use of the requested data within the collecting government entity; (b) whether the individual may refuse or is legally required to supply the requested data; (c) any known consequence arising from supplying or refusing to supply private or confidential data; and (d) the identity of other persons or entities authorized by state or federal law to receive the data.

Users acknowledge consent to proceed with information collection and consent to comply with the rules of behavior for system access at initial account creation. Throughout the application, MNSure provides Tennessen warnings for any information collected, and the individual agrees and accepts to move forward or declines if they do not agree with the data collection described. For paper applications, a notice of privacy practices describes the use, collection and consent for disclosure of private data. Also, for collection on the phone to the Contact Center, a recording or Contact Center operator provides oral Tennessen warnings, and the individual may opt in or opt out. The privacy policy, terms of use and Tennessen warnings are also publicly available and printable on the MNSure website. An individual may revoke consent by submitting a written request to the privacy & security manager.

Data Challenge

If an individual who is the subject of private data concludes, after viewing the data, that the data is inaccurate or incomplete, the individual may file a lawsuit or may file a challenge regarding the accuracy and completeness of the data.

To file a challenge to the accuracy or completeness of the data, the individual must write to the privacy & security manager and include a description of the nature of the disagreement. If the privacy & security manager requires more information to determine whether the data are accurate or complete, he/she may contact the individual for clarification. The privacy & security manager must review the data and the complaint and respond within the timelines set forth in Minnesota Statutes, section 13.04, subdivision 4.

If the privacy & security manager agrees the data in question is inaccurate or incomplete, he/she must correct the data and make reasonable efforts to notify past recipients of the data about the data corrections. If the privacy & security manager is convinced that the contested data is accurate and complete, he/she must inform the individual of this conclusion. If the privacy & security manager decides that disputed data is accurate and complete and the individual still disagrees, the individual may file an administrative appeal to the Minnesota Department of Administration as set forth in Minnesota Statutes, section 13.04, subdivision 4, and Minnesota Rules 1205.1600.

Access by Employees

Employee and contractor access to private data is limited by position description and minimum necessary access controls. MNSure has also employed security safeguards such as separation of duties and physical controls to limit exposure to private data for anyone who does not have a business reason for access to specific data. These controls include system access management, secure buildings and equipment, instructions for proper handling and disposal of data in all forms and appropriate personnel consequences for a violation.

Each request for access to private data maintained in MNSure systems is determined on a case-by-case basis. An employee's supervisor, or a contractor's employee sponsor, evaluates the employee's/contractor's necessary job duties and the minimum access required to accomplish such duties. The supervisor/employee sponsor submits a request for the minimum necessary access (least privilege) for the employee/contractor to the MNSure privacy & security manager, who verifies successful completion of a background check and privacy and security training.

The MNSure board or delegated authority reviews each request on a case-by-case basis to approve or deny the access request. Access by privileged users to an individual's private data such as case file and eligibility factors is also tracked and the data contained in audit trail logs.

Data Practices Requests

Anyone may request data from MNSure for any reason, including individual data subjects and members of the public. Requests are made in writing by filling out an online form, contacting the privacy & security manager or emailing the MNSure data requests mailbox.

MNSure has handled more than 170 separate requests for public data, many of which involve several subparts and voluminous responsive data.

The majority of requests come from media outlets, followed by organizations, individuals and Minnesota legislators and staffers. MNSure is committed to government transparency and makes publicly available its contracts, RFPs, grant awards, board meeting materials, federal certification milestones and other information [on the MNSure website](https://www.mnsure.org/about-us/) (<https://www.mnsure.org/about-us/>).

Incident Response Process

MNSure staff and contractors receive informational advisories and training regarding security and privacy incidents. Staff is required to immediately report potential security or privacy incidents or breaches, and MNSure convenes an incident response team to evaluate the necessary criteria to determine the level of notification. Furthermore, data-sharing agreements with outside partners to whom private data is sent or received also include obligations to immediately notify of any security or privacy incidents. Incidents are handled in accordance with established policy and include communication with executive leadership, legal staff, public relations staff, external partners and IT providers.

MNSure has investigated approximately 45 instances of potential security or privacy breaches since 2013. The majority of these incidents involved an unintended electronic disclosure such as sending an email to the incorrect recipient, while others were not in fact an error or privacy or security incident. The remaining incidents involved potential malware, coding issues and system operations at the initial launch and mailing errors for bulk mailings.

In each instance, an investigation was conducted and the issue resolved. Additionally, measures were considered and put into place as necessary in order to prevent and mitigate any same or similar issue from occurring in the future.

Data Sharing

MNSure is limited in disclosing protected information unless the individual provides informed consent in an authorization or such disclosure is provided by law. MNSure's governing statute allows for data sharing according to a court order, where specifically authorized by state or federal law, to the subject of the data, or only to the extent necessary to verify the identity of, determine the eligibility of, process premiums for, process enrollment of or investigate fraud related to an individual, employer or employee participating in MNSure, provided that MNSure must enter into a data-sharing agreement or contract with the agency prior to sharing data. Minnesota Statutes, section 62V.06, subdivision 5.

MNSure has entered into data-sharing agreements with other state agencies and federal partners to carry out exchange functions, with health insurance companies to transmit enrollment information and with contractors to perform work on behalf of MNSure. If a MNSure participant seeks to share information with a designee, MNSure has a standard consent form that may be used.

Appeals

Consistent with its authority to develop an appeals process for certain eligibility determinations, in 2013, MNSure entered into a service-level agreement with DHS and the Office of Administrative Hearings to develop and implement its appeals process. As required by state law, MNSure reported on the development of the appeals process and its first year of

operations. These [reports are available on MNSure's website](https://www.mnsure.org/about-us/grants-reports/) (https://www.mnsure.org/about-us/grants-reports/). Furthermore, MNSure developed public education materials on its appeal processes, including:

- [Information on appeals](https://www.mnsure.org/help/appeals/) (https://www.mnsure.org/help/appeals/),
- [FAQ on appeals](https://www.mnsure.org/help/appeals/appeals-faq.jsp) (https://www.mnsure.org/help/appeals/appeals-faq.jsp),
- An [archive of redacted appeal decisions](https://www.mnsure.org/help/appeals/archive.jsp) (https://www.mnsure.org/help/appeals/archive.jsp), and
- A [search engine for redacted appeal decisions](https://www.mnsure.org/help/appeals/search.jsp) (https://www.mnsure.org/help/appeals/search.jsp).

In calendar year 2015, MNSure proposed and the legislature passed statutory amendments to the appeals process at Minnesota Statutes, section 62V.05, subdivision 6(e)-(i). These amendments more closely aligned MNSure's judicial review procedures with those used for Medicaid appeals. The MNSure appeals process serves as a shared front door for MNSure-the-agency and DHS MAGI ("Medicaid") appeals based on eligibility determinations made by the MNSure system. Yet, while serving as a single, shared front door, DHS has its own separate law governing its appeals. In aligning its judicial review procedures, MNSure hoped to provide more consistency and convenience, and less guesswork for its consumers who remain aggrieved with their MNSure appeal order (decision).

Consequently, MNSure also proposed amendments to the procedural rules governing appeals at Minnesota Rules, Parts 7700.0100-0105. The objectives of the immediate rulemaking included: streamlining the existing appeal rules with recent statutory amendments on appeals; amending the rules where we received further federal guidance and clarity; and providing further guidance for appeals examiners and consumers where MNSure noticed inconsistency or misperception. The public comment period closed on November 18, 2015. MNSure is still processing the finalization of these rule amendments and hopes to publish the final rules in 2016.

Conclusion

Looking ahead to 2016 and beyond, MNSure will continue to prioritize a smooth and seamless customer experience. MNSure will continue to work on an open dialogue with partners, stakeholders and overseers to maintain transparency and accountability with the public. Finally, MNSure will continue to work toward our mission and goal—reducing the rate of uninsured in Minnesota.

If you have not yet shopped for coverage during this open enrollment period, please go to www.mnsure.org to search for coverage options that might be right for you and your family.