

MINNESOTA HEALTH INSURANCE EXCHANGE

PERFORMANCE PROGRESS REPORT

Submitted to CCIIO January 2013

Core Area: Legal Authority and Governance

What are the primary strategies your Program has used to approach this Core Area?

- Hire full-time staff within the Department of Commerce dedicated to building on activities accomplished under earlier grants to develop detailed work plans, timelines and budget estimates.
- Pass a bill through the MN legislature that includes language for ongoing governance of the MN Exchange. (SF1 and HF5 introduced in January 2013.)
- Establish Advisory Task Force to provide guidance on the design and development of a Minnesota Exchange and create Technical Work Groups to provide stakeholder input on the design and development of a Minnesota Exchange.
- Task Force recommendations were referenced in process of drafting Exchange legislation.
- Coordinate efforts and resources with core state agencies including the Minnesota Departments of Human Services, Health, MN.IT (consolidated IT) and Management and Budget.

What are some of your Program's significant accomplishments or strengths in this Core Area?

- On October 31, 2011, Governor Dayton issued an Executive Order directing the Commerce Commissioner, in partnership with the Minnesota Departments of Human Services and Health, to "Design and develop a Minnesota health insurance exchange to ensure access to affordable, high-quality health coverage that maximizes consumer choice and minimizes adverse selection."
- In September 2012, Governor Dayton announced the transfer of Exchange design and development activities from the Department of Commerce to Minnesota Management and Budget. In the same letter, Governor Dayton noted his intention to work with state legislators early in the upcoming 2013 legislative session on policy decisions related to governance, financing and navigators and brokers.
- A Governance work group was created to provide technical assistance and information on options related to the permanent governance of a Minnesota Health Insurance Exchange. The Governance work group met publicly in late November and early December 2011 and presented options for consideration by the Exchange Task Force in late December 2011. The Exchange Task Force included recommendations related to the ongoing governance of the Exchange in their January 2012 report, suggesting a public-private partnership model would best meet the goal of providing health insurance choices to individuals and businesses while also integrating public health care coverage, like Medicaid into the Exchange.
- Until a permanent governance structure (as outlined in the Exchange bill introduced in January 2013 - HF5 and SF1) is established, interim governance decisions are being led by Minnesota Management and Budget, in a collaborative manner through multi-agency work groups and interagency agreements, with input from the Exchange Advisory Task Force of stakeholders.

Core Area: Consumer and Stakeholder Engagement and Support

What are the primary strategies your Program has used to approach this Core Area?

- Establish Advisory Task Force with members representing a variety of stakeholder groups to provide guidance on the design and development of a Minnesota Exchange.
- Hire full-time staff dedicated to building on activities accomplished under earlier establishment grants to develop detailed work plans, timelines and budget estimates including stakeholder engagement activities.
- Create Technical Work Groups to provide stakeholder input on the design and development of a Minnesota Exchange, including a Communications and Marketing and Navigators and Agents/Brokers work groups.
- Lay the groundwork for public education and outreach by soliciting RFP bids for market research, brand development and public communications planning that will help direct public awareness and engagement strategies for the Minnesota Exchange.
- Assess customer service functionality for the Exchange including an assessment of the functional customer service needs of the Exchange, documenting existing resources that can address some of these needs and examining options for operations. Exchange staff are also collaborating with the Department of Human Services to assess how existing call center operations can be coordinated and integrated into the operational plan.
- Exchange bill includes policy direction for ongoing customer service functions of the MN Exchange.

What are some of your Program's significant accomplishments or strengths in this Core Area?

Exchange Advisory Task Force

- The MN Health Insurance Exchange Advisory Task Force was created under authority granted in Minnesota Statutes §15.014 in September 2011 and works in coordination with the Governor's Health Care Reform Task Force. The Advisory Task Force provides guidance on issues related to the development of an Exchange for Minnesota including but not limited to:
 - Size of the small employer market
 - Merger of the individual and small group markets
 - Provisions to avoid adverse selection
 - Risk adjustment
 - Regulatory simplification
 - Cost, quality, satisfaction rating for insurers and health benefit plans
 - Navigator program provisions
 - Governance
 - Ongoing funding mechanisms
- Task Force members were appointed in October 2011 via an open appointments process. Task Force membership includes consumers, employers, health care providers, health insurers, insurance brokers/agents, organizations with experience assisting people with public programs, health care market experts, legislators, and Commissioners of State agencies.
- The Exchange Task Force released initial recommendations relating to avoiding adverse selection, ongoing financing, governance and navigators and agents/brokers in January 2012.
- In the fall and winter of 2012 the Task Force considered recommendations from a variety of work groups including:
 - Navigators and Agents/Brokers (levels of service, training/certification/licensure and compensation)
 - Finance (ongoing funding options)
 - Adverse Selection (risk adjustment and stand alone dental)
- These recommendations will inform policy discussions and decisions early in the 2013 legislative session.

Work Groups

- A number of technical work groups have been created to provide technical assistance on the design and development of a Minnesota Exchange.
- These work groups are comprised of a variety of stakeholders and are tasked with developing, discussing and providing technical assistance on options to the Administration through the Health Insurance Exchange Advisory Task Force. There are numerous work groups which include:
 - Adverse Selection and Encouraging Market Competition and Value
 - Plan Certification Subgroup
 - Navigators and Agents/Brokers
 - Governance
 - Financing
 - Tribal Consultation
 - IT and Operations
 - Individual Eligibility
 - Small Employers and Employees
 - Measurement and Reporting
 - Outreach, Communications and Marketing
- In the past year, more than 200 stakeholders have shared their ideas, advice and time towards planning a Minnesota Health Insurance Exchange. As Minnesota enters the next phase of Exchange development, a number of the work groups will be re-aligned, transitioning from standing committees focused on planning work to groups of advising experts. The transition will begin in 2013 once work groups have forwarded recommendations or reports to the Advisory Task Force. These newly formed advisor groups will be called upon for guidance on detailed development work, in particular design work of the IT infrastructure for the exchange. Some work groups will remain in their current configuration and will not transition to an advisor role, since their work is more on-going in nature. The Adverse Selection work group may shift their focus to the topic of risk adjustment should the legislature decide to handle it on the state level. Finance and Governance will conclude their work by the end of the year.

Marketing, Communications and Outreach

- Minnesota is continuing to develop and implement strategies and work plans for communications, marketing, and stakeholder outreach and engagement efforts designed to educate Minnesotans about the Exchange. These activities include coordinating Exchange communications and outreach activities in a number of state agencies including Minnesota Management and Budget, Minnesota Department of Human Services,
- Minnesota Department of Commerce, Minnesota Department of Health and MN.IT. Activities include:
 - Initiating an inter-agency outreach planning work group. The group will discuss ways to utilize current communication channels from multiple state agencies to employ in helping spread information about the Exchange.
- Redesigning the website towards a public education and outreach focus. The new site will continue to serve as an easily accessed source of information about Exchange-related planning activity for stakeholders and the public. At the same time, the new site will be designed to begin building long-term engagement with targeted audience segments to give them the information they are seeking now and establish a relationship so they are poised to sign on once enrollment opens.
- Continuing presentations to stakeholder groups. To date, Exchange and Commerce staff have presented to over 80 groups representing a variety of constituencies, including business associations, community groups and health care professionals.

- Exhibited in the HealthFair 11 area at the Minnesota State Fair. Over 300,000 Minnesotans visited HealthFair 11, while staff had meaningful
- conversations with more than 2,600 Minnesotans who stopped by the booth to ask questions and gather information.
- Completed market research to help inform a public communications and outreach campaign. The insights gained are proving extremely helpful in formulating not just marketing strategies, but planning for SHOP and for the navigator/assistor program.
- Worked with a public relations vendor to develop a strategic public communications and social media plan for 2013, as well as develop key messaging.
- Working with a branding vendor to develop a permanent name and logo for the Minnesota Exchange.

Navigators and Agents/Brokers

- Minnesota has created a Navigator, Agent and Broker work group that focuses on options for navigators, agents and brokers to assist individuals, small employers and employees seeking health insurance coverage through the Minnesota Health Insurance Exchange. The work group members consist of a broad selection of stakeholders including a consumer, small employer, health insurer, navigator, agents/broker, provider, county representative, tribal representative as well as state agency and legislative staff. In December 2011, the work group presented the Exchange
- Advisory Task Force an initial list of recommendation to ensure that consumers and businesses served by a Minnesota Exchange receive the necessary assistance to complete the application and enrollment process. The Exchange Advisory Task Force adopted the work group's proposed recommendations in their January 2012 meeting. The work group presented recommendations regarding levels of service and training/certification/licensure to the Task Force at the October 2012 meeting, and recommendations regarding compensation were presented in November 2012. Policy decisions related to Navigators and Agents/Brokers are also included in the Exchange bill currently being considered at the MN legislature.
- Additional activities to date include:
 - Navigator:
 - Completed a multi-state environmental scan to further inform the recommendations for the Levels of Service, as well as navigator, agent, broker roles, certification/licensure, training, targeted populations, tools and compensation.
 - Draft Navigator Program Design completed including current Navigator, Agent & Broker Work Group levels of service recommendations.
 - Draft report identifying Levels of Service to be provided by Navigators, Agents & Brokers was presented to and accepted by the MN Advisory Task Force.
 - Landscape review of current training and certification practices with organizations performing similar duties and services, i.e. MNCAA, Senior Linkage, etc. in addition to other state activities and considerations was completed.
 - Performed landscape review of current Minnesota Outreach and Education Public Programs and Community Efforts; to document an inventory of organizations and inform future potential partnership development.
 - Developed draft recommendations regarding Training, Certification and Licensure requirements for the Navigator / Consumer Assistance
 - Program which were presented to and accepted by the Advisory Task Force.

- Consumer Assistance / Navigator Program Compensation Models were developed per recommended Level of Services and presented to the Advisory Task Force on 12/11/2012.
- Assessed and began capturing initial administrative and operational resource needs necessary to build the infrastructure of the Consumer Assistance Program.
- Agent/Broker:
 - As above.
 - Working in collaboration with Outreach and Marketing and a Third Party vendor to perform Marketing research with the Agent and Broker community to inform future partnership and collaboration within the HIX, as well as corresponding work activities leading up to and beyond the start-up operations of the HIX.

Customer Service

- Minnesota has worked with consultants to assess customer service functionality for the Exchange. This work includes an assessment of the functional customer service needs of the Exchange, documenting existing resources that can address some of these needs and examining options for operations. Exchange staff are also collaborating with the Department of Human Services to assess how existing call center operations can be coordinated and integrated into the operational plan. Policy decisions related to customer service options are included in the Exchange bill currently being considered at the MN legislature

Core Area: Eligibility and Enrollment

What are the primary strategies your Program has used to approach this Core Area?

- Establish Advisory Task Force with members representing a variety of stakeholder groups to provide guidance on the design and development of a Minnesota Exchange, including eligibility and enrollment activities.
- Hire full-time staff within the Department of Commerce, including Public Programs Operations Director, dedicated to building on activities accomplished under the Planning and Level One Establishment grants to develop detailed work plans, timelines and budget estimates including program integration with the Minnesota Department of Human Services (Medicaid agency.)
- Create stakeholder and interagency work groups to provide stakeholder input on the design and development of a Minnesota Exchange, including an Individual Eligibility work group.

What are some of your Program's significant accomplishments or strengths in this Core Area?

- An Individual Eligibility and Enrollment work group has been created to focus on options for criteria, functions, processes, and assistance to support streamlined individual eligibility determinations for public and private coverage through a Minnesota Health Insurance Exchange. The work group consists of consumer, health insurer, navigator, agent/broker, provider, county, and tribal representatives as well as state agency and legislative staff.
- Documentation of eligibility policy requirements for Insurance Affordability Programs started in July 2011 and is ongoing. The Exchange has leveraged existing subject matter experts and policy expertise at the Minnesota Department of Human Services in the documentation of the Insurance Affordability Programs (IAP) eligibility policy requirements. Staff continue to analyze and document IAP eligibility policy to identify and resolve policy gaps and to escalate policy issues for decisions as needed.

- The new Minnesota Health Insurance Exchange Interagency Structure includes both an Eligibility and an Enrollment work group:
 - Eligibility: This group addresses issues of streamlined eligibility determination for premium tax credits and Medicaid, continuity of care and coordination of benefits for individuals moving between public and private coverage and families with members enrolled in public and private coverage, and effective account/case management services for these individuals and families. This work group is specifically responsible for Maximus contract module 1 and portions of module 7 (including eligibility, exemption, and account/case management) and blueprint sections 3, except portions of 3.3, 3.4, 3.6, 3.11, and 3.12 and portions of section 3.0 related to SHOP.
 - Enrollment: This group addresses issues related to health plan enrollment for private and public health insurance. This work group is specifically responsible for Maximus contract module 2 and blueprint section 3.12.
- The Minnesota Exchange works in close coordination with the Minnesota Department of Human Services, Minnesota's Medicaid agency. Minnesota Exchange staff coordinate regularly with staff at other agencies, including multiple weekly meetings, shared participation in monthly calls with CMS and joint APD/gate reviews.
- Activity in this area as also included:
 - Reviewed with the vendor during Sprints 1 and 2, the high level requirements for the following
 - Anonymous Plan / Provider Information Search
 - Communicate Consolidated Household Eligibility Results – MAGI
 - Determine Household Premium Payments and Pay Now
 - Determine if Eligible for the Exchange
 - Determine Potential Medicaid or CHIP Eligibility and Tax Credits - Eligibility (MAGI) and Screening
 - Determining Eligibility for Advance Payment of Premium Tax Credits & Cost Sharing Reductions and BHP
 - Enroll in Selected Plan (State Funded or QHP) - Initial Enrollment Form(CNX interface in place)
 - Enter Application Data - MAGI and State Programs
 - Estimate Tax Credit
 - Maximum Premium Tax Credit Verbiage
 - Monthly Plan Cost and Premium Verbiage
 - Monthly Tax Credit to Apply Verbiage
 - Receive and Process Household Premium Data
 - Remove Company Plan Advisor for Medicaid
 - Remove Wellness Plan Advisor for Medicaid
 - Shop for Eligible Health Plans (State Funded or QHP)
 - Performed deep dive with vendor during Sprint 3 to
 - Explore case management which includes redetermination of eligibility
 - Explore the Individual shopping and enrollment functionality - demographics and eligibility interface
 - Explore the Medicaid shopping and enrollment functionality
 - Review verification functionality of IBM/Curam solution

Core Area: Plan Management

What are the primary strategies your Program has used to approach this Core Area?

- Close coordination with state agencies with regulatory authority of insurance and HMOs.

- Create technical work groups to provide stakeholder input on the design and development of a Minnesota Exchange, including an Adverse Selection work group and plan certification subgroup.
- Create interagency work group to facilitate coordination on plan management issues.

What are some of your Program's significant accomplishments or strengths in this Core Area?

- In Minnesota, the Commissioner of Commerce has statutory authority to enforce Minnesota's insurance laws and the Commissioner of Health has authority over HMOs. To avoid duplication of regulatory responsibilities and to capitalize on existing regulatory expertise, the certification process will be conducted by the existing regulatory structures within the Departments of Commerce and Health. The Departments of Commerce and Health have released a joint regulatory bulletin specifying the requirements and process for filing plans and rates for certification for the Exchange.
- The process flows will be facilitated by the State Electronic Rate and Form Filing (SERFF) system. The Minnesota Exchange has also released guidance to insurers on plan certification requirements to comply with Minnesota Law.
- Additional accomplishments include:
 - Commissioner-level decision to utilize SERFF standardized templates when released in March of 2013.
 - Interagency steps taken to build a centralized repository for provider network adequacy and directory data.
 - Leading Exchange IT vendor through understanding, properly structuring, and correctly displaying provider quality data.
 - Leading Exchange IT vendor through understanding, properly structuring, and correctly displaying issuer plan data.
 - Establishing monthly carrier meetings to address certification processes as well as data submission questions.

Core Area: Risk Adjustment and Reinsurance

What are the primary strategies your Program has used to approach this Core Area?

- Hire full-time staff within the Department of Commerce, including a Quality and Measurement Reporting Director and Commercial Operations Director, dedicated to building on activities accomplished under the Planning Grant to develop detailed work plans, timelines and budget estimates related to risk adjustment.
- Create Technical Work Groups provide stakeholder input on the design and development of a Minnesota Exchange, including an Adverse Selection Encouraging Market Competition and Value Work Group and a subgroup on Risk Sharing and Risk Adjustment

What are some of your Program's significant accomplishments or strengths in this Core Area?

Risk Adjustment

- Minnesota has chosen not to operate a state-based risk adjustment program for 2014 or 2015.
- Minnesota may revisit this decision in future years. Minnesota requests the U.S. Department of Health and Human Services (HHS) to administer the federal risk adjustment program for the state.

Reinsurance

- Minnesota has also chosen not to operate a state-based reinsurance program. Minnesota requests that HHS administer the federal reinsurance program for the state.

Core Area: Small Business Health Options Program

What are the primary strategies your Program has used to approach this Core Area?

- Hire full-time staff within the Department of Commerce, including an Operations Director, to build on activities accomplished under establishment grants received to date to develop detailed work plans, timelines and budget estimates related to development of a SHOP.
- Create Technical Work Groups provide stakeholder input on the design and development of a Minnesota Exchange, including a Small Employers and Employees work group

What are some of your Program's significant accomplishments or strengths in this Core Area?

- Hire full-time staff within the Department of Commerce, including an Operations Director, dedicated to building on activities accomplished under previous grants to develop detailed work plans, timelines and budget estimates related to development of a Minnesota SHOP. Efforts are currently underway to hire a Small Group Director.
- Minnesota has created a Small Employers and Employees work group to provide technical assistance and explore options related to these issues for a Minnesota Health Insurance Exchange. The work group include consumer, large and small employer, health insurer, navigator, agent/broker, and provider representatives as well as agency and legislative staff and experts.
- An interagency work group has also been established to interpret Federal and State regulations.
- Vendor use case models developed.
- Sprint sessions scheduled to configure and enhance COTS products.
- Technical design solution to support premium aggregation developed. Working closely with Finance work group to configure
- COTS product and integrate with existing financial systems.

Core Area: Organization and Human Resources

What are the primary strategies your Program has used to approach this Core Area?

- Hire full-time staff to provide leadership to Exchange design and development activities in Minnesota
- Minnesota Exchange activities are taking place as part of Minnesota Management and Budget. This structure has enabled the Exchange to utilize existing state processes and procedures and coordinate with other state agencies as appropriate.

What are some of your Program's significant accomplishments or strengths in this Core Area?

- The Minnesota Exchange have hired a number of senior leadership staff to date.
- Minnesota Exchange design and development activities are currently being led by Minnesota Management and Budget. As such, the Exchange is able to utilize existing state processes and procedures. Minnesota is also committed to creating an Exchange that works for all Minnesotans and as such is coordinating with other state agencies to the greatest extent possible.
- Specific accomplishments to date include:

- The MN HIX team has hired 5 additional full time employees since June 2012: 1) Public Relations Officer 2) Appeal Manager 3) Internal Audit/Program Integrity Supervisor 4) Financial Analyst 5) Public Programs Business Specialist, BA
- An additional 7 positions are in the posting process as of January 1, 2013: 1) Financial Analyst 2) Business Program Manager 3) Business Procurement Manager 4) Business Manager HR 5) Health Services Researcher 6) SHOP Director 7) Customer Services Director
- Additional positions will be posted and targeted to be filled in the next 6 months. 1) Privacy Officer 2) Accounting Director 3) Operation positions for customer service, plan management, SHOP, Navigator/Agents/Brokers and individual eligibility
- MN HIX Consultants/ Temporary Resources
 - The temporary resources needed by MN HIX have been staffed to meet 90% of the needs. A few additional resources have been identified such as User Acceptance Business Analysts, additional Business Analyst, and a few additional Project Managers.

Core Area: Finance and Accounting

What are the primary strategies your Program has used to approach this Core Area?

- Hire full-time staff within the Department of Commerce, including a Finance Director, dedicated to building on activities accomplished under the Planning Grant to develop detailed work plans, timelines and budget estimates related to financial management of an Exchange.
- Utilize existing Department grant management, procurement, financial management and internal control structures for all Exchange activity.
- Create Technical Work Groups provide stakeholder input on the design and development of a Minnesota Exchange, including a Finance work group.

What are some of your Program's significant accomplishments or strengths in this Core Area?

- Because Minnesota development and design activities are proceeding within Minnesota Management and Budget, Minnesota Exchange activities are able to utilize existing state resources and grant monitoring processes and procedures. These efforts are ongoing and updated as needed.
- Exchange staff have developed and implemented a process for invoicing the Department of Human Services for cost allocated items and have completed an assessment of the state SWIFT IT system for adequacy for Exchange activity.
- Minnesota is developing and implementing IT and operating solutions for premium processing with identified partners. Further, the Exchange has established internal controls and oversight mechanisms, including procedures to test compliance and detect fraud and third party review of all systems to ensure ongoing monitoring of internal controls.
- Minnesota has hired a Finance Director and Business Analyst for the Exchange within the Department of Commerce to develop and manage work plans and structures to support the scope of financial activities of the Exchange.
- Grant management, procurement, financial management and internal controls for the Exchange planning and establishment grants currently follow the financial and accounting processes and procedures of the Department of Commerce and State of Minnesota. Work plans are under development by the Finance Director in coordination with the Department of Commerce Program Integrity Office to establish a Program Integrity Framework for the Exchange. Within this coordinated effort, the Exchange will be using the COSO framework approach to program

integrity. This will include creating a control environment, risk assessment, control activities, information and communication systems and monitoring process.

- Risk mitigation strategies will be developed for ensuring financial integrity, oversight and prevention of fraud and abuse.
- A stakeholder Finance Work Group has been created to provide technical assistance and information on options related to the ongoing financing of a Minnesota Health Insurance Exchange. The Finance Work Group met numerous times in late 2011 and 2012 and presented options for consideration by the Exchange Task Force in late December 2011 and 2012.
- Additional accomplishments include:
 - Use of the MN State accounting system SWIFT
 - The premium billing and invoices systems and service centers
 - Legislation introduced that includes funding mechanism
 - Fiscal note completed on legislation

Core Area: Technology

What are the primary strategies your Program has used to approach this Core Area?

- Hire full-time staff within the Department of Commerce, including an IT Project Director, dedicated to building on activities accomplished under the Planning Grant to develop detailed work plans, timelines and budget estimates related to IT infrastructure.
- Sign IT contract completing two-stage "proof of concept" Request for Proposals (RFP) process for "best in class" information technology components of an Exchange. IT contract signed and completed in June 2012.
- Collaborate with Minnesota Department of Human Services to jointly complete Gate Reviews and PAPD.

What are some of your Program's significant accomplishments or strengths in this Core Area?

- Minnesota is committed to developing an Exchange that is consumer-friendly, easy to use and accessible, and fosters fair and equitable competition in the health care system. The Minnesota Exchange will seamlessly support private and public health care coverage options to individuals and small businesses. To accomplish these goals Minnesota is working closely with vendors, state agencies and other states to leverage existing efficiencies and expertise. Minnesota's IT infrastructure is modular in nature to encourage a best in class solution.
- Minnesota has entered into a vendor contract to utilize existing COTS software that will be tied together via an integration layer to make up the MN HIX solution. We also are leveraging existing infrastructure resources within the MN Medicaid agency to host the MN HIX solution. A plan to fortify the infrastructure has been established and enacted to meet the estimated needs during production times. Efforts have also commenced to establish integration solutions that will be utilized with the MN HIX.

Core Area: Privacy and Security

What are the primary strategies your Program has used to approach this Core Area?

- Hire full-time staff within the Department of Commerce, including a Senior Counsel, dedicated to developing detailed work plans, timelines and budget estimates related to privacy and security of an Exchange.

- Privacy and Security provisions have been built into the technical and business infrastructure contract that was signed in July 2012.

What are some of your Program's significant accomplishments or strengths in this Core Area?

- Protecting privacy and security of Exchange users is a paramount focus of all Exchange design and development activities. Users of the Exchange must feel confident that their personal information is safe and secure to ensure trust and accountability in the new online marketplace. Minnesota has included detailed privacy and security requirements in the recently announced IT contract and is working closely with agency partners and vendors to make certain all federal privacy and HIPAA laws are followed.
- Additional accomplishments to date include:
 - Identifying and starting a Privacy & Security cross agency work group
 - Analysis of the PIA to breakdown to a level to assign resources to complete.
 - Decision to leverage current information security and privacy infrastructure within other MN state agencies.

Core Area: Oversight, Monitoring and Reporting

What are the primary strategies your Program has used to approach this Core Area?

- Hire full-time staff within the Department of Commerce, including a Senior Counsel, dedicated to oversight, monitoring and reporting.
- Utilize existing state processes and procedures.

What are some of your Program's significant accomplishments or strengths in this Core Area?

- Minnesota is designing an Exchange that is accountable to the people of Minnesota. Minnesota is dedicated to ensuring prevention of waste, fraud and abuse at every level of Exchange design and development activity. Current efforts have included working with existing State Agency resources devoted to these issues and with outside resources with vast experience in this arena. Minnesota will continue to monitor and report on all areas of waste, fraud and abuse prevention and will continue to update standards as new best practices become available. Minnesota is requesting grant funding for an Internal Audits/Program Integrity Manager and enforcement staff at the Department of Commerce.
- Additional activities to date include:
 - Control awareness training for the team working on the MN HIX website tool.
 - Overall prioritization plan for business risks to the Exchange to determine schedule for deep dive assessments.
- Process to complete a deep-dive business risk assessment for the business processes tied to the MN HIX website tool after each development sprint and later into the testing phase.