



Greater Tompkins County Municipal Health Insurance Consortium

PO Box 7 • Ithaca, New York 14851 • (607)274-5590
www.tompkinscountyny.gov/hconsortium • consortium@tompkins-co.org

“Individually and collectively we invest in realizing high quality, affordable, dependable health insurance.”

AGENDA **Operations Committee** **January 23, 2022 – 1:00 P.M.** Town of Ithaca – Aurora Conference Room

1. Call to Order L. Granger

2. Changes to the Agenda:

3. Approval of October 24, 2022 Minutes

4. Executive Director Report (1:10) E. Dowd
 - a. Update
 - b. Strategic Initiatives
 1. Medicare Advantage and EGWP
 2. Premium Equivalent Rate Update
 - c. Plan Consolidation, not elimination
 - d. Blue4U Spring 2023

5. Resolution: Approval of Contract to Enter into An Agreement with Lifetime Benefit Solutions to Prepare Documents

6. IT Risk Assessment 2022 & 2023 (1:45) G. Potter

7. Resolution: Adoption of Cyber Security Audit and Review of Business Continuity Plan

8. Executive Session: Contract Review (2:00) E. Dowd
RX Rebate

9. Future Discussion Topics: (2:25)

10. Adjournment (2:30)

Next Meeting: April 24, 2023

**Operations Committee
Minutes – DRAFT
October 24, 2022 – 1:00 p.m.
Town of Ithaca/Aurora Conference Room**

Present: Sunday Earle* *arrived 1:13p*, Schelley Michell-Nunn; Judith (Judy) Drake; Laura Granger*; Janine Bond* *arrived 1:19p*
Excused: Lisa Holmes; Mark Emerson; LuAnn King; Ed Fairbrother
Absent: Janine Bond
Staff/Guests: Elin Dowd, Executive Director; Teri Apalovich, Finance Manager; Kylie Rodrigues, Benefits Specialist; Greg Potter, Tompkins County Information Technology

* = Via Zoom remote due to extraordinary circumstances

Call to Order

Ms. Drake called the meeting to order at 1:06 p.m.

Ms. Drake appointed herself as a voting member due to lack of quorum and chaired the meeting due to Ms. Holmes' excused status.

Changes to the Agenda

There were no changes to the agenda

Approval of July 25, 2022 Minutes

Approval of the minutes was deferred to later in the meeting due to lack of quorum at this time.

Executive Director Report

Ms. Dowd announced in 2023 the Consortium is to offer Medicare Advantage to members. Ms. Dowd is still talking to Aetna, and it is possible to offer in conjunction with the Medicare Supplement Plan to utilize some subsidies by self-funding on the prescription drug side. This is better than what some municipalities are doing now. Ms. Drake asked when the Medicare Advantage would be effective, and Ms. Dowd answered March 2023, but she is uncertain if any groups will even start in 2023 and she foresees them to wait until year 2024.

Ms. Michell-Nunn questioned when the sick leave buyout expires, would retirees be eligible. Ms. Dowd responded that retirees could be put on the plan before that, and they could use their sick leave to purchase. This would bring the premiums down significantly.

Ms. Dowd reported after the annual meeting, all municipalities have been notified of their updated rates and rates are posted on the Consortium's website. Benefit Clerk trainings have been held and many benefited from training of open enrollment and changes upcoming for January 1, 2023.

Ms. Dowd said the Consortium has 8 new members coming in 2023, which makes the Consortium member count at 61 municipalities. Ms. Granger asked if we had any members leave the Consortium this year. Ms. Dowd responded the Consortium did not. Ms. Dowd added the

Consortium has current members who are planning to switch plans to different coverages for the following year.

Ms. Earle arrived

Ms. Rodrigues spoke regarding concerns the Consortium had/has with ProAct when the renewal was signed. One concern is modification to access ProAct's system to see ID numbers, verification of coverage, but not claims data. Ms. Rodrigues reported that the eligibility system is ready to implement, however, part of the DFS audit pointed out the Consortium needs to adhere to a system that approves individuals who will be managing the checks and balances. There currently is an approval form in progress which will allow the Executive Director to sign to approve in those individual(s).

Ms. Dowd announced the Department of Financial Services (DFS) audit of the Consortium is still ongoing. Currently, DFS has all documents needed for the financial aspect of the audit, but that portion has not yet started. Regarding last year's audit, it was noted that the Consortium needs a new process regarding IT Risk Assessment. These items came to light regarding the Consortium's relationship with Tompkins County's IT Department. Tompkins County IT is not certain they will be able to support the Consortium specifically in those needed areas going forward because of the time constraints and complexity of the problem.

Ms. Bond arrived

Dependent Audit Update

Ms. Dowd mentioned the Consortium has a large group that needs to complete their audit. DFS requires periodic municipality audits and encourages open enrollment training Ms. Drake mentioned it is encouraged during open enrollment to remind municipalities to ask employees of address changes, family status changes, etc.

Discussion: Plan Consolidation vs. Plan Elimination

Ms. Dowd reported that last meeting there was a resolution presented regarding access to returning to certain plans and it was determined by the Joint Committee that was difficult to explain that regarding negotiations. Ms. Dowd discussed how the Consortium could advance solutions in plan consolidation and plan elimination. She said the Consortium would like to move away from the Integrity Plans and the PPO Plans and move towards the Metal Level plans. She explained that the Consortium was built at a time when health care was totally different and the government entities, we're offering very rich benefits at the cost of the municipality and the employees. Once a municipality has excellent benefits in place, it is difficult to move away to negotiate away from those excellent benefits. However, the price tag on those benefits is going to continue to rise, which leads to municipalities unable to afford them any longer. Ms. Dowd stressed as a Consortium, it is irresponsible to continue to support them, because they are so costly this is how the conversation started. The Consortium would like to move to consolidate plans instead of entire plan elimination.

Ms. Dowd also shared the Consortium is working with a consultant looking at premium equivalent rates and making sure all premium equivalent rates can stand on their own.

Ms. Drake asked what plan or migration of plans the Consortium had in mind. Ms. Dowd responded that PPO plans are easier to transfer to Platinum plans and potentially move them

towards three-tier prescription drug plans, with prior authorizations and step-therapy will bring the cost of a whole down. Ms. Rodrigues added that some of our smaller municipalities are realizing the price tag of a PPO versus a Platinum, and they're offering incentives to bridge that gap. She said that the possibility to use an HRA to help offset some of that expense or offering it as an option rather than an obligation to hopefully move all new employees to Platinum.

Ms. Michell-Nunn added that the Indemnity plan will be around, how can the Consortium come up with a model of change of habits, such as a gift certificate or reimbursement for individuals to have screenings or going to a doctor versus emergency room. It may be difficult to track, but beneficial for change. Ms. Dowd agreed and mentioned if the Consortium can't move away from a traditional indemnity plan, what can the Consortium do to create change in habits. She advised this topic can be discussed through more and analyze premiums and who would pay for what percentage. She said the Consortium will keep making progress and look to the Committee for any suggestions.

Ms. Earle said that at Tompkins Cortland Community College, they offer a supplemental cap HRA program. She welcomes any municipalities to reach out and she can advise how the college structures a bridge between getting someone to switch but give them a bit of incentive for a period of time.

Resolution – Amendment to Resolution No. 011-2020 – “Authorization by the Board of Directors to Remove Benefit Plans from the Consortium’s Menu of Benefit Plan Offerings” by Restricting Plan Enrollment

Ms. Rodrigues presented the resolution, explaining there are three plans the Consortium is looking to eliminate. Two would be eliminated at the end of this year and the other eliminated at the end of next year. She said one of the smaller municipalities moved from the PPO to Platinum effective January 1, 2023, which had been the last one in the plan. The Comprehensive plan currently only has four subscribers, and those municipalities will be working on the elimination into their negotiations for next year.

MOVED by Ms. Michell-Nunn, seconded by Ms. Bond.

Ms. Earle asked if all three plans listed in the resolution would not have active participants as of 2023. Ms. Rodrigues responded the first two plans will be completed by the end of December 2022, and the third plan by the end of 2023, and all groups are fully aware.

The resolution was unanimously adopted by voice vote by members present and members joined remotely due to extraordinary circumstances.

**RESOLUTION NO. - 2022 – AMENDMENT TO RESOLUTION NO. 011-2020
“AUTHORIZATION BY THE BOARD OF DIRECTORS TO
REMOVE BENEFIT PLANS FROM THE CONSORTIUM’S
MENU OF BENEFIT PLAN OFFERINGS” BY RESTRICTING
PLAN ENROLLMENT**

WHEREAS, to achieve administrative efficiencies the Consortium removed from the Consortium’s Menu of Benefit Plan Offerings effective January 1, 2021 the following benefit plans:

1. Indemnity Plan MM3

Plan Description:

MM3 – Basic Benefits with “Major Medical” \$100/\$200 Deductible & \$750/\$2,250 Out-of-Pocket Maximum

2. Medicare Supplement Plans MS1, MS2, MS5, and MS6

Plan Descriptions:

MS1 - Medicare Supplement Plans with No Prescription Drug Coverage

MS2 - Medicare Supplement Plans with \$5/\$15/\$30 Rx Copay Plan

MS5 - Medicare Supplement Plans with 20%/20%/40% Rx Copay Plan

MS6 - Medicare Supplement Plans with 20%/30%/50% Rx Copay Plan

, and

WHEREAS, to achieve further administrative efficiencies the Consortium wishes to continue consolidation and streamlining its menu of benefit plan offerings, and

WHEREAS, although included in the menu of benefit plan offerings, there are medical and prescription drug plans that are not being utilized by Consortium Participants and have no one enrolled or less than five Participants, and

WHEREAS, the removal of these plans from the Consortium’s menu of benefit plans has been recommended by the Consortium’s Consultants, now therefore be it

RESOLVED, on recommendation of the Operations Committee and the Joint Committee on Plan Structure and Design, That the Executive Committee, on behalf of the Board of Directors, hereby Amends Resolution No. 011-2020 “Authorization by the Board of Directors to Remove Benefit Plans from the Consortium’s Menu of Benefit Plan Offerings” to include the following benefit plans be removed from the Consortium’s Menu of Benefit Plan Offerings, and any new Participants will be restricted from enrolling in the following plans due to low enrollment.

MM3- Classic Blue MM RX (No ProAct Prescription coverage) \$50/\$150 Deductible & \$400/\$1,200 Out-of-Pocket Maximum
End Date: December 31, 2022

PPO3- PPO \$20/35 with \$2,000/\$6,000 Out-of-Pocket Maximum and \$750/\$2,250 Out of Network Deductible
End Date: December 31, 2022

MM6- Comprehensive Plan with \$500/\$1,500 Deductible & \$2,500/\$7,500 Out-of-Pocket Maximum
End Date: December 31, 2023

Approval of July 25, 2022 Minutes (Moved due to lack of quorum earlier)

It was MOVED by Ms. Granger, seconded by Ms. Earle, and unanimously adopted by voice vote by members present, to approve the minutes of July 25, 2022, as submitted. MINUTES APPROVED.

Corrections will be made moving forward as both Schelley Michell-Nunn and Laura Granger’s last names were spelled incorrectly within the body of the minutes.

Resolution – Amendment to Resolution No. 001-2017 – Adoption of GTCMHIC Records Retention Policy

Ms. Apalovich reported the ongoing audit advised the Consortium had an outdated records retention policy. She said originally the Consortium was following the New York State Archives CO-2 records retention schedule, which expired in April 2022. The Consortium now needs to follow the LGS-1 Records Retention policies that New York State has in place.

Ms. Earle asked if there were any significant changes. Ms. Apalovich advised there weren't any significant changes pertaining to the Consortium

RESOLUTION NO. -2022 – AMENDMENT TO RESOLUTION 001-2017 ADOPTION OF GREATER TOMPKINS COUNTY MUNICIPAL HEALTH INSURANCE CONSORTIUM RECORDS RETENTION POLICY

MOVED by Ms. Drake, seconded by Ms. Bond.

The resolution was unanimously adopted by voice vote by members present and members joined remotely due to extraordinary circumstances.

WHEREAS, the Department of Financial Services has recommended through its examination of the Greater Tompkins County Municipal Health Insurance Consortium that in 2017 the Consortium adopted the New York State Archives CO-2 as its records retention schedule; this schedule has been superseded as of April 2022 and is now obsolete, and

WHEREAS, the Consortium should establish a records retention policy to comply with the Retention and Disposition Schedule for New York Local Government Records (LGS-1), issued April 2022, that includes the provision policy "maintain an application where no policy or contract was issued for six calendar years or until after the filing of the report on examination in which the record was subjected to review, whichever is longer", and

WHEREAS, on behalf of the Consortium Third Party Administrators, due to the protected health information, shall be responsible for retention of claims records in accordance with this regulation, and

WHEREAS, the Consortium shall be responsible for the retention of the Consortium's administrative records, including meeting agendas and minutes, contracts, correspondence, and other administrative-related documents, and

WHEREAS, since the inception of the Consortium records have been retained electronically to the greatest extent possible and also in accordance with the New York State Archives CO-2, a local government retention and disposition schedule for counties and local governments, now therefore be it

RESOLVED, By the Greater Tompkins County Municipal Health Insurance Consortium that Retention and Disposition Schedule for New York Local Government Records (LGS-1), issued April 2022 Record Retention Policy, and containing legal minimum retention periods for local government records, is hereby adopted for use by all officers in legally disposing of valueless records listed therein.

RESOLVED, that in accordance with Retention and Disposition Schedule for New York Local Government Records (LGS-1), issued April 2022 record retention policy:

- (a) only those records will be disposed of that are described in Retention and Disposition Schedule for New York Local Government Records (LGS-1), after they have met the minimum retention periods described therein;
- (b) only those records will be disposed of that do not have sufficient administrative, fiscal, legal, or historical value to merit retention beyond established legal minimum periods.

RESOLVED, on recommendation of the Department of Financial Services the Greater Tompkins County Municipal Health Insurance Consortium adopts the Retention and Disposition Schedule for New York Local Government Records (LGS-1), issued April 2022 for the Consortium's administrative records.

* * * * *

MCA Update

Ms. Dowd reported the MCA for 2023 went out for resolution and approval. She explained every year the Consortium adds new members, the MCA needs to be updated. She also said this year there were significant changes as Richard (Rick) Snyder, the Consortium's Treasurer is retiring, and the Finance Director will gain that role. There is also a request to the DFS for a change in our Certificate of Authorization to include two new counties.

IT Risk Assessment

Mr. Potter explained the IT Risk Assessment Plan is approved yearly and provides overview of the systems to the State. This Assessment is to identify and adhere to the State requirements under their guidelines and to find any vulnerabilities. He said the current audit determined that there are certain Consortium services that the IT department does not have the expertise or experience with. He said since the Consortium's devices are attached to Tompkins County's network, and updates will most likely be on how the devices are managed remotely and what additional services they can provide.

Ms. Dowd asked if there is any other action that the Consortium needs to take. Mr. Potter said the bigger is discussion concerns how to track individuals that access in health care, particularly those services and data that are managed by external companies like Excellus and ProAct.

Ms. Dowd added that ProAct is not an insurance company unlike Excellus, who also follows the DFS regulations. Ms. Drake asked if we should consider dropping the County as our IT representative. Mr. Potter said that is not necessary, but a supplement with a vendor who specializes in the health insurance and data safety that information and data is handled securely is recommended.

Mr. Potter added there are currently cyber-security practices that IT is working on within the entire County. He said that it is currently being discussed of how to roll the Consortium into the three projects currently implemented. These projects include:

1. Tompkins County IT has hired a company called CyberDefense Institute which creates customized security practices to meet regulations and risk assessments to focus security resources in the right areas.

Mr. Potter recommended the Consortium may want to research this option for Health-related computer risk and safety.

2. Project with NYS to roll out a Joint Operation Center based out of Brooklyn This is feeding information from the County or larger cities in the State into an operation system. They would collect all information across the State so they can better address cyber security practices. When their department starts that project, the Consortiums device information will be collected. This will possibly change how IT will manage devices remotely.
3. Review of the governance of Office 365 and evaluating what the permissions individuals have to access folders within Office 365. Also, investigate internal intranet sites, so the IT department the county has its own website just for internal information.

Next Meeting Agenda Items

Overview of RX rebates
IT Risk Assessment Plans 2022 & 2023

Adjournment

The meeting adjourned at 2:14p.m.

The next meeting will be held January 23, 2023

Respectfully submitted by Lynne Sheldon, Clerk of the Board



**Group Health Plan(s)
Summary Plan Description**

Proposal created for:

**Greater Tompkins County
Municipal Health
Insurance Consortium**

Presented By: Daniel Burkey

333 Butternut Drive / Syracuse, NY 13214

LifetimeBenefitSolutions.com

Effective Date: January 1, 2023

Who We Are

Flexible. Creative. Affordable. That's Lifetime Benefit Solutions.

Developing the right benefit plan isn't just about number crunching; it's also about people. It's about focusing on individuals and creating a plan around them. For over 40 years, we have been providing quality products and services nationwide.



A Snapshot of Our Current Offerings

We offer a growing suite of benefit plans and services you can use to enhance your existing health plan. Mix them. Match them. Use as many or as few as you need. Each is built with flexibility in mind, designed to save money by working together or independently.



Reimbursement Accounts

We offer Flexible Spending Accounts (FSA), Health Reimbursement Accounts (HRA), Health Savings Accounts (HSA), and Parking and Transportation Reimbursement Accounts.



COBRA Administration

We know it can be difficult to manage the many COBRA regulations. Compliance is critical. Lifetime Benefit Solutions will handle your COBRA administration quickly and accurately.



Retirement Services

Our 401(k) administrators assist organizations in every step, from initial plan design to implementation.



Compliance Services

We're here to help your business remain in compliance. When you partner with us, we prepare your summary plan descriptions, plan documents, amendments, and more.



Premium Billing

Our system is designed to assist with the collection of necessary premiums along with a complete reporting module. We help you save time and keep administrative costs low.




Employee Support

A supplemental fund debit card option that groups can offer their employees who are unable to work or working fewer hours to help cover necessary living expenses, or those employees who have transitioned to working from home to offset the costs of outfitting a home office.



Compliance Services



ERISA and the Department of Labor, (if applicable), require employers maintaining Group Health and Welfare Plans to distribute a Summary Plan Description (SPD) which may include a Benefit Booklet, to each employee eligible to participate in the Plan. Courts have repeatedly penalized employers that have withheld information from Plan participants or that have provided incorrect information to Plan participants.

The key elements of a successful Group Health Plan(s) Summary Plan Description are clear and concise communication, and dependable ongoing compliance services. Our service combines our experience, personalized service and integrated computer capabilities to deliver these key elements efficiently and cost effectively.

Our Approach

We're here to help your business remain in compliance. We will prepare the Plan Document (PD) and/or SPD/Benefit Booklet for your medical, dental, and/or vision Group Health Plans. The PD/SPD/Benefit Booklet will address specific requirements including cost-sharing provisions, specific benefits provided under each Group Health Plan, as well as provisions governing the use of network providers.

Ongoing Support

Amend your fully-insured or self-insured Group Health Plan PD/SPD/Benefit Booklet upon request and as needed.



Self-Insured/ Article 47 Plan Document Pricing

Medical and Rx:

- Benefit Booklet **\$5,500.00**
Includes preparation of three benefit booklets:
 - All PPO Options
 - All Classic Blue Options
 - All Classic Blue Comprehensive
- Restatements **\$3,000.00 for three documents**

Fees are valid for 90 days from date of proposal. Note: Pricing is based on information submitted by customer. Pricing is based on our standard services; additional fees may apply for services not outlined within this proposal. Any additional carriers and/or benefits programs that are not listed in this proposal are subject to Lifetime Benefit Solutions approval. Additionally, standard Lifetime Benefit Solutions charges may apply.



Greater Tompkins County Municipal Health Insurance Consortium

P.O. Box 7 • Ithaca, New York 14851 • (607) 274-5590

Headquarters: 215 N. Tioga Street, Ithaca, NY 14850

www.healthconsortium.net • consortium@tompkins-co.org

"Individually and collectively we invest in realizing high quality, affordable, dependable health insurance."

RESOLUTION NO. XXX- 2023– APPROVAL OF CONTRACT TO ENTER INTO AN AGREEMENT WITH LIFETIME BENEFIT SOLUTIONS TO PREPARE DOCUMENTS

WHEREAS, as an Article 47 municipal health insurance organization we are required to maintain and update any approved benefit changes to our Summary Plan Description (SPD) which allows our Participants to share required plan information to their employees and direct our Third-Party Benefit Plan Administrators on proper claims adjudication according to our Plan Documents and

WHEREAS, maintaining and amending Plan Documents is an ongoing responsibility requiring a specific expertise and keen sense of NYS Insurance Law expertise and

WHEREAS, Lifetime Benefit Solutions offers services specific to creating and maintaining Health Plan(s) Summary Plan Descriptions. Lifetime Benefit Solutions services combines experience, personalized service, and integrated computer capabilities to deliver these key elements efficiently and cost effectively and

WHEREAS, Lifetime Benefit Solutions can help our organization remain in compliance and prepare the Plan Document (PD) and/or SPD/Benefit Booklet for our medical Plans. The PD/SPD/Benefit Booklet will address specific requirements including cost-sharing provisions, specific benefits provided under each Health Plan, and

WHEREAS, the Audit and Finance Committee and Board of Directors have had detailed discussions and have approved the Consortium's 2023 budget and premium rates, and

WHEREAS, the Audit and Finance Committee and the Executive Committee have policies in place to amend the approved budget when appropriate, now therefore be it,

RESOLVED, that the Operations Committee recommends that the Executive Committee approves the addition of a contract with Lifetime Benefit Solutions to commence services on Plan Document and SPD creation for all GTCMHIC plans and

FURTHER RESOLVED, to instruct the Executive Director to execute a contract with Lifetime Benefit Services to Commence preparing documents for all GTMHIC Health Plans.

Risk Assessment for Greater Tompkins County Municipal Health Insurance Consortium – 2022-2023

Purpose

As a service defined in an annual Memorandum of Understanding (MOU) between the Greater Tompkins County Municipal Health Insurance Consortium and the Tompkins County Information Technology Services Department (ITS), the provision of technology services provided to the Consortium shall include support in compliance with 23 NYCRR 500.

The specific **Section 500.09, Risk Assessment** of 23 NYCRR 500 addressed in this document is as follows:

(a) Each Covered Entity shall conduct a periodic Risk Assessment of the Covered Entity's Information Systems sufficient to inform the design of the cybersecurity program as required by this Part. Such Risk Assessment shall be updated as reasonably necessary to address changes to the Covered Entity's Information Systems, Nonpublic Information or business operations. The Covered Entity's Risk Assessment shall allow for revision of controls to respond to technological developments and evolving threats and shall consider the risks of the Covered Entity's business operations related to cybersecurity, Nonpublic Information collected or stored, Information Systems utilized and the availability and effectiveness of controls to protect Nonpublic Information and Information Systems.

(b) The Risk Assessment shall be carried out in accordance with written policies and procedures and shall be documented. Such policies and procedures shall include:

(1) criteria for the evaluation and categorization of identified cybersecurity risks or threats facing the Covered Entity;

(2) criteria for the assessment of the confidentiality, integrity, security and availability of the Covered Entity's Information Systems and Nonpublic Information, including the adequacy of existing controls in the context of identified risks; and

(3) requirements describing how identified risks will be mitigated or accepted based on the Risk Assessment and how the cybersecurity program will address the risks.

Identification of Information Systems

1. Office 365 – Email, group data exchange, file repository related to the five accounts as managed by ITS under the Tompkins County Microsoft tenant.
2. Consortium@tompkins-co.org(G3), HCWellness@tompkins-co.org, edowd@tompkins-co.org(G3), tapalovich@tompkin-so.org(G3), krodrigues@tompkins-co.org(G3), hcbilling@tompkin-co.org, lsheldon@tompkins-co.org(G3)
3. Microsoft Active Directory (5 accounts) – Access control, Identity management, role-based rights for access to the Tompkins County network and managed devices
4. Unstructured Data – Digital file storage (F and G drives) as connected to the Tompkins County Storage Area Network (SAN). The SAN product implemented and supported by Tompkins County

is based on NetApp technology, with complete backups and redundancy between two County owned data centers.

5. Zoom & YouTube Channel (virtual meetings) – A YouTube Channel and Zoom have been configured. ITS has provided and continues to assist with zoom meeting use under general cyber security practices and the Tompkins County managed licensing structure.
6. VPN Client - Four remote access Virtual Private Network accounts have been created with client configurations on laptops. The VPN use allows for a secure connection to internal IT resources hosted in the Tompkins County data centers.
7. Laserfiche – Form creation, processing, and storage.
8. Web Site – Hosted by a vendor (Discover-eGov) with the site developed and managed by Consortium employees in Drupal 8.
9. Excellus – Management of Health Insurance accounts and details.
10. ProAct – Pharmacy benefit management
11. Hardware Inventory –
 - Dell Latitude 7290, Windows 10, Serial 7QHTTN2, Encrypted, AD name HCDIRECTOR18 (SPARE Laptop)
 - Dell Latitude 5520, Windows 10, Serial 91Z5FL3, AD Name EDOWD22
 - Dell Latitude 5520, Windows 10, Serial 7RDTTG3, AD name KRODRIGUES22
 - Dell Latitude 5520, Windows 10, Serial D2Z5FL3, AD name HICLERK22
 - Dell Latitude 5520, Windows 10, Serial 65PDX93, AD Name TAPALOVICH21
 - RICOH MP C307 copier (C91180919 Owned by GTCMHIC but managed by Tompkins County)
 - Cisco 3650 data switch
 - 4 Mitel/Shoretel 230G phones

Identification of Risks

1. Physical - The Consortium offices are in a locked-restricted access building and the staff lock the office when no one is present. There is locked storage inside the rooms to put paperwork when staff is not working on it.
 - a. Access to physical data
 - i. Locked doors
 - ii. Locked file cabinets
 - iii. All physical data secured before leaving premises
 - b. Access to Computer Hardware
 - i. Login required
 - ii. Devices encrypted
 - iii. Portable media locked and/or encrypted
2. Data
 - a. Active Directory - Rights delineate access to centralized data storage.
 - b. Multi-factor Authentication - Implemented for all Microsoft Office 365 accounts, modules, data, and VPN.
 - c. Virtual Private Network (VPN) Access - Remote access to Tompkins County hosted resources outside of the physical network requires a VPN connection with authentication. Four VPN accounts are configured for the Consortium with distinct

- passwords and access privileges. Established VPN accounts include Edowd, Tapalovich, KRodrigues, and LSheldon.
- d. Financial software (QuickBooks) - System and data access are managed by ITS and the Consortium Finance Manager.
 - e. Laserfiche - System and accounts are managed by Tompkins County. Front facing web forms for Municipality Management, Municipality Employee Benefit Changes, Onboarding for New Agencies, Code of Ethics, and Security Breach.
 - f. Excellus - Requires encrypted web connection as well as multi-factor authentication.
 - g. ProAct - Requires encrypted web connection as well as multi-factor authentication.
 - h. Tompkins County network is firewalled from external network (Internet) and local traffic monitored through the use of an intrusion detection system.
 - i. Centralized data audited as to activity and is backed up in case of hardware failure or user error.
3. Penetration Testing and Vulnerability Monitoring – As part of the GTCMHIC MOU with Tompkins County ITS, a continuous monitoring of data and systems is provided to detect, on an ongoing basis, changes that may create or indicate vulnerabilities.

Security Training

Staff have received cyber security training from the Tompkins County Information Security and recently specific to their positions at the Consortium. Staff who conduct business outside the Consortium have been trained for appropriate use of hardware and authentication to various accounts and the use of encryption. In addition, Consortium staff will be automatically included in future Tompkins County CyberSecurity training programs and campaigns designed to reduce vulnerabilities and improve security practices focused on common outside attacks against data systems (phishing, vishing, etc.).

System Controls

1. Office 365 Security Center
 - a. allows for auditing PII/HIPAA data in e-mail
 - b. recognizes non-normal logins
 - c. allows for data auditing and discovery/recovery tools
 - d. encryption for email and data traffic
 - e. data encrypted on servers with company key
2. Varonis
 - a. allows for data classification
 - b. auditing of centralized data sources (ownership, changes, access)
 - c. auditing of Active Directory changes
3. Sophos Cloud-based management system
 - a. Hard drive encryption
4. Crowd Strike and Participation NYS JSOC (Joint Security Operation Center)
 - a. Antivirus & Malware
 - b. Scanning end user devices (laptops)
5. Intrusion Detection System (IDS)
 - a. Analyzes internal network traffic for malicious or abnormal transactions
 - b. Monitored 24x7 by IDS vendor with alerts to local staff as appropriate

- c. Collects data by incident for analysis
- 6. Cisco Firepower
 - a. Internet filtering
 - b. VPN
- 7. Lansweeper
 - a. Help desk and end device hardware/software auditing and asset management

Access Control

1. Multifactor access to Office 365
2. VPN encryption required for all outside connections to internal network
3. Unstructured Data Folders on SAN permit access based on company, role, identity through Active Directory
4. Encrypted hard drives
5. Account Management - use of ITS hosted form to document all account changes for Consortium employees

Reporting and Accountability

1. Contracts (with BAA agreements and appropriate security responsibilities documented) in place with external vendors
 - a. Tompkins County
 - b. Discover-EGov
2. Breach Response Reporting in place to initiate investigation, incident Response, and appropriate reporting to outside entities

Focus Items

1. Adoption of official security assessment procedure and policy documentation and framework. Tompkins County ITS is in the process of responding to various levels of Federal and NYS Cyber Security requirements and standards. It is likely that ITS will adopt the National Institute of Standards and Technology Cybersecurity Framework (NIST CSF) soon. These would in turn guide additional procedures and policies for the Consortium.
2. To evaluate hiring an external firm to audit and provide recommendations for contracts, the management of data, internal business processes, and cyber security practices.
3. Integration of new Tompkins County IT Policies expected to be implemented in the 2nd Quarter of 2023
4. If the GTCMHIC considers relocation, ITS would assist in the review of the alternatives to support the compliance with 23 NYCRR 500.



Greater Tompkins County Municipal Health Insurance Consortium

P.O. Box 7 • Ithaca, New York 14851 • (607) 274-5590

Headquarters: 215 N. Tioga Street, Ithaca, NY 14850

www.healthconsortium.net • consortium@tompkins-co.org

"Individually and collectively we invest in realizing high quality, affordable, dependable health insurance."

RESOLUTION NO. XXX-2023 - ADOPTION OF CYBER SECURITY AUDIT AND REVIEW OF BUSINESS CONTINUITY PLAN

WHEREAS, the Board of Directors adopted a Cyber Security Policy and Business Continuity Plan to adhere with NYS Department of Financial Services rules and Regulations requiring Article 47 Municipal Cooperative Health Benefits to comply with Part 500 of Title 23 of the Official Compilation of Codes, Rules, and Regulations (NYCRR) of the State of New York, and Insurance Circular Letter No. 7 (2021).

WHEREAS, the Executive Committee has delegated responsibility for accepting the Audit to the Operations Committee, now therefore be it

RESOLVED, That the Operations Committee authorizes the Executive Director and the Tompkins County Department of Information Technology Services, through its contract with the Consortium, to continue to assess the Cyber Security Program and Business Continuity Plan, including its Policy and Procedures and to report any substantive changes to the Operations Committee, and

RESOLVED, further, That the Operations Committee directs the Executive Director to file a Certificate of Compliance with the New York State Department of Financial Services by February 15, 2023 and an updated Business Continuity Plan annually.
