



GOVERNMENT OF BERMUDA
Ministry Of Health and Seniors

Information Statement
Public Authority: Health Insurance Department

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Introduction to Your Rights under Public Access to Information

This document is the Information statement for the Health Insurance Department (the Department). In accordance with the Public Access To Information (PATI) Act 2010, every public authority has a legal duty to maintain an Information Statement. The Health Insurance Committee (Committee) established by legislation under the Ministry responsible for Health governs the Department.

The purpose of the PATI Act and this document is to make information readily available to the public without the need for specific written requests, to encourage authorities to proactively publish information and to develop a culture of openness. Every person who is a Bermudian, or resident of Bermuda, has a right to access any record held by a public authority unless it is exempt. Several classes of information are exempt, including: Personal information (unless it relates to the requestor); Sensitive commercial, information received in confidence; Operations and deliberations of Public Authorities; Cabinet, Ministerial and Governors documents; and Legal documents. However, these exemptions are subject to the public interest test, except those that would be in contempt of Court, infringe Parliamentary privilege or are prohibited by other legislation [see sections 21 to 40, PATI Act]. In addition every person has a right to amend their personal information if it is incomplete, incorrect or misleading [s19, PATI Act].

How to make a request

Requests for information, or to amend your personal information, must be in writing using the application form, and submitted to the Ministry Information. See Section G for how to make a request including the documents needed, record specificity, contact information and process timelines.

Key, including definitions

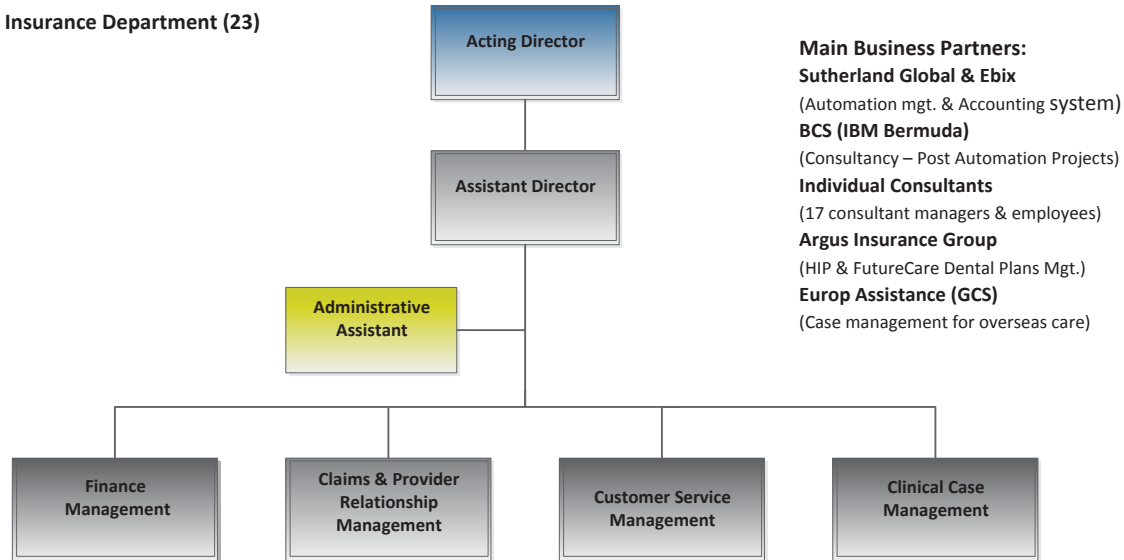
- The Department means the Health Insurance Department

- The Ministry means the Ministry of Health and Seniors
- The Committee means the Health Insurance Committee
- HIP means Health Insurance Plan
- PATI means Public Access To Information
- [] Square brackets, refer to sections of the PATI Act, unless another Act is indicated

Section A: Structure, Organization and Governing Legislation [s5(1)a]

Insert structure of Authority (a chart – if helpful, and some explanatory text):

Health Insurance Department (23)



The Health Insurance Department, established April 1, 2009, is the former Hospital Insurance Section of the Department of Social Insurance. Current staff consists of four (4) civil servants and one (1) seconded civil servant. Fifteen individual consultancy contracts are currently issued along with Statements of Work to four (4) main business partners for outsourced services and functions. The newly formed Department is the sole administrator of public health insurance in Bermuda.

Update at Dec 2016: The assistant director post has been removed; and Global Medical Management Inc. (GMMI) undertakes the role of case management for overseas care (i.e. not Europ Assistance).

Department Sections: Finance Management, Claims and Provider Management, Customer Service Management, Clinical Case Management and **Off-site Outsourcing:** Sutherland (Post-Automation Management) IBM (Post Automation Project Management), Argus (Dental Management) and Europ Assistance (Overseas Case Management)

Sub-Programmes:	Cost centre:
Health Insurance Administration	101000 & 101020
Medical Claims	101010

Insert governing Legislation:

- **Health Insurance Act 1970** – The Health Insurance Department is managed by the Health Insurance Committee and has operational and administrative responsibility to execute the functions under the Health Insurance Act

- **Bermuda Health Council Act 2004** – This legislation governs the Committee

Section B1: Legislated Functions, Powers, Duties of the Authority [s5(1)b]

Insert power, duties and function of the authority (cite Act or Policy):

As the public health insurer of Bermuda the Department offers insurance products and services to children, the employed, the unemployed and senior citizens. The Department also administrates, on behalf of the Committee, various local Government subsidies for persons of all ages.

The Department is governed by the Committee and has operational and administrative responsibility to execute the functions under the Health Insurance Act.

1. Detailed functions of Committee [11C, Health Insurance Act, 1970]

The functions of the Committee are –

- a) to manage the Health Insurance Plan and the FutureCare Plan;
- b) to receive claims of insured persons in respect of payments to be made out of the Health Insurance Fund, the FutureCare Fund and the Mutual Re-Insurance plans;
- c) to investigate and decide on claims;
- d) to authorize the payment of claims which have been approved by it;
- e) to manage and review the state of the Funds;
- f) to review, and advise the Minister regarding, the payment of subsidies;
- g) to make recommendations to the Minister concerning the Funds; and
- h) to perform other functions as may be assigned to it by or under the Act or by the Minister

2. Detailed functions of Department –

- a) Oversees health funds: Health Insurance Fund and HIP; FutureCare Fund; Mutual Reinsurance Fund (MRF); and Subsidy Entitlement –
 - **Health Insurance Plan (HIP)** – an affordable health plan for persons of all ages mainly providing coverage for in-patient and out-patient treatment, in-patient surgery, personal home care, wellness, and dental benefits. HIP offers three (3) insurance packages:
 - **HIP**
 - HIP Youth
 - HIP non-subsidized
 - **FutureCare Plan** – an affordable health plan for seniors providing coverage for in-patient and out-patient treatment, in-patient surgery, personal home care, wellness, dental benefits, and prescription drugs. FutureCare offers two (2) insurance packages:
 - FutureCare
 - FutureCare non-subsidized
 - **Mutual Reinsurance Fund (MRF)** – a SHB loss adjustment mechanism for HIP and FutureCare

- **Government Subsidy Entitlement (standard benefits)** [Part 1, Section 2 of the Health Insurance Act] An earmark targeted at the Youth (100%), the Aged 70% ages 65 -74 and 80% ages 75+ and the Indigent of insurable ages
 - b) Collects premiums for HIP, MRF and FutureCare
 - c) Accounting, reporting and investment of funds under management
 - d) Receives, adjudicates and pays claims
 - e) Maintains a database of individuals qualified for subsidy entitlement
 - f) Provides support to Bermuda Health Council
 - g) Engages actuarial review services
 - h) Determines eligibility for certificate of entitlement
 - i) Ensures various employer compliance with health insurance legislation

The Department collects premiums, receives, adjudicates and pays claims. Eligibility and enrollment is maintained for policyholders, including billing, individual reimbursement, administration of identification cards and customer service. The Department also maintains a database of those who qualify for subsidy entitlement. Functions also include promoting and holding Open Registration periods to allow members of the public to enroll with no medical assessment.

The Department performs all the accounting, financial reporting and investments for the funds under management. The Department administers its program from the annual budget appropriated from the Consolidated Fund (a capital injection) and premium receipts, and records and pays all its administrative expenses through government. The Department also coordinates the reimbursement of the Consolidated Fund from the other funds under management. The Department engages outside actuaries to conduct its annual review of its claims experience and to recommend reserves.

The Department collaborates with industry stakeholders to work through strategic issues in addition to providing support to the Ministry of Health and the Bermuda Health Council on various projects and via sub-committees.

3. Decision Making

The Committee manages the HIP and FutureCare funds. It is an appointed body under the Health Insurance Act and the Bermuda Health Council Act 2004. The Head of Department functions as an HIC Ex Officio member (by virtue of office). Government subsidies are provided through the Consolidated Fund, administrated by the Department and regulated for decision making under the Act by the powers given to the HIC. Decision making documents are listed under **Section F**.

Section B2: Obligations under PATI Act [s5(1)b]

Same for all public authorities

1. To provide an **information statement** for the public and promulgate it [s5],
2. To provide **other information** to the public so that the public needs only to have minimum resort to the use of the Act to obtain information [s6]. This includes:
 - a. General information, e.g. activities of the Department
 - b. Log of all information requests and their outcome
 - c. Quarterly expenditure (upon request) [s6(5)]
 - d. Contracts valued at \$50,000 or more.
3. To **respond to information requests** in a timely manner [s12-16]
4. To **track information requests**, and provide this data to the Information Commissioner
5. To respond to requests from the Information Commissioner [s9]

6. To **amend personal information** held by the Department that it is wrong or misleading following a written request by the person to whom the information relates [s19]
7. To conduct an **internal review** if formally requested [part 5]
8. To give evidence for **review by the Information Commissioner** [part 6, 47(4)], or for **judicial review** [s49], if required **Contractual and legal documents** – legally binding agreements between the Department and business partners and other parties
9. To provide an **annual written report** to the Information Commissioner of the status of information requests [s58 (3)].
10. **To do anything else as required** under the PATI Act and subsequent Regulations [s59, 60], including:
 - a. **Fees** for Requests for information
 - b. Management and maintenance of **records**
 - c. **Procedures** for administering the Act
11. To **train staff and make arrangements** so as to facilitate compliance with the Act [s61]
12. To **designate one of its officers** to be the person to whom requests are directed [s62]

Section C: Services and Programmes [s5(1)c]

Insert a summary of services and programmes provided by the authority:

The Department's service-products, programmes, service information and other activities are listed in further detail below.

1. Service-products

a) *Health Insurance Plan (HIP)*

- Carries monthly, quarterly, biannual and annual premiums for the three (3) HIP insurance packages
- Insurance plan available to individuals and groups
- For policyholders aged 18 to 65 and dependants from birth to 21, if enrolled in full time education and their parent/guardian is a policyholder
- Coverage for in-patient and out-patient hospital care, supplemental benefits (including personal home care, wellness programmes and dental)

b) *FutureCare Plan*

- Like HIP, but more comprehensive
- Carries a monthly, quarterly, biannual and annual premium
- For persons aged 65 and over

c) *Mutual Reinsurance Fund (MRF)*

- Premium-funded by all local health insurers and approved schemes
- Contributes to HIP and FutureCare to equalize Standard Hospital Benefit claims experience to industry average

d) *Government Subsidy Entitlement*

- Hospital subsidies for youth (100%), Indigent (100%), Aged (70% at age 65 and 80% at age 75)
- Funded by the Consolidated Fund

2. Programmes

- a) Health Insurance Administration (Cost Centers 101000 and 101020)

This programme funds the daily operations and management of the government's health insurance products offered to the public. This programme provides core services for the Health Insurance Department. The Department operates the Health Insurance Plan, the FutureCare Fund, the Mutual Reinsurance Fund and Government Subsidy programs. This includes the: 1) Product/Business Development; 2) Claims; 3) Financial; 4) Operations; and 5) Relationship Management functions of these products.

This programme also provides funding for implementation and on-going service fees for the Department's technology partners. Key business partners perform various services for the Department including back office functions (administration and policyholder maintenance), overseas case management, and maintenance of the technology platform.

b) Medical Claims Subsidy (Cost Center 101010)

This programme funds local Bermuda Hospitals Board Government Subsidy claims. It provides subsidized medical treatment for certain vulnerable populations, such as those aged 0-21 years, over age 65 years, and the indigent.

3. Service Information

It should be noted that the dental plans for HIP and FutureCare are administrated by the Argus Insurance Group of Companies. Argus will accept all dental related customer enquiries.

Overseas treatment (portability benefits) for HIP and FutureCare policyholders is administrated by Europ Assistance (GCS), formerly the Canadian Medical Network. Europ Assistance (GCS) has arranged an Overseas Preferred Provider Network which offers HIP and FutureCare policyholders the best preferred facilities based on quality and value. Europ Assistance (GCS) must be a policyholders first contact following a local physician referral for overseas treatment.

General enquires on the administrative services of the Department may be made to the Customer Services Office, Sofia House, 48 Church Street, Hamilton.

4. Other

The Department occasionally engages in various activities, such as:

- Public Opinion Surveys on various Department products and services (as of 2012, the latest survey, 73% of respondents would recommend HIP or FutureCare to others, up by 0.47% over the previous year)
- Biannual Open Enrollment periods from 1-14 March and 1-14 September
- Town Hall meetings to educate the public on product benefits and services
- Participation in private and community sponsored Health Fairs

Section D: Records and Documents held [s5(1)d]

1. Finance and Banking

- a) *Approved Estimates of Revenue and Expenditure*. (2014). (Public Access). A fiscal summary of Capital Projects, Budget Allocations and details of Inputs and Outputs for each Ministry/ Department as relates to annual revenue and expenditure

- b) *Budget Statements*. (2014). (Public Access). A Ministry of Finance publication that follows the annual Budget Speech in the House of Assembly by the Minister of Finance – usually during the month of February
- c) *Enterprise Risk Management*. (project in progress). (Public Access). A process designed to identify, assess and manage potential risk events that may adversely affect the Department and its ability to achieve its strategic initiatives and objectives
- d) *Financial Statements*. (various dates). (Public Access). A formal record of HIP, FutureCare and Mutual Reinsurance Fund financial activities
- e) *Bank Statements*. various dates). (Public Access). Generated by the Bermuda Commercial Bank Ltd., HSBC and the Bank of N.T. Butterfield for all Department fund accounts

2. Annual Reports

- a) *Actuarial Reports*. (various dates). (Public Access). All products, rates and benefits are actuarially reviewed by Morneau Shepell, a Canadian actuarial and consulting firm engaged by the Ministry of Health, Seniors and the Environment
- b) *Department Annual Reports*. (Various dates). (Public Access). Reports the activities of the preceding year including internal and external audit outcomes

3. Administrative

- a) *Letters, form letters and memoranda*. (various dates). (Public Access). Internal and external bound correspondence
- b) *Service Level Agreements (SLA)/ Statements of Work (SOW)*. (various dates). (Public Access). Contracts of agreements for organizational business partners
- c) *Contracts of Employment*. (various dates). (Public Access) –
 - Bermuda Public Service Commission (BPSC) – five (5) contracts for the Department’s civil servants
 - Bermuda Executive Services (BES) – one (1) group contract for all consultancy Personnel (**past dates**). Since 2015 there are 5 new contracts.
- d) *Job Descriptions*. (various dates). (Public Access) –
 - Civil Service – BPSC position **I.Ds for HID** filed with the Department of Human Resources
 - Consultant Contracts – positions agreed between the Department and individual consultants

4. Operational

- a) *Business Rules (also an administrative and decision making document)*. (various dates). (Public Access). Captures all operational policy, legislative guidelines and approved procedures
- b) *Requirements Documentation*. (various dates). (Public Access). Guidelines prepared by the post-automation project team for continued operations with respect to:

- Dental claims administration
- Overseas claims with Sutherland Global and case management with Europ Assistance (GCS)
- Insurance benefit design
- Conference hosting and facilities

c) *Clinical Case Management*. (project in progress). (Public Access). Anticipated reports to deal with the process of helping people identify healthcare goals, needs, and resources (also helping them connect, coordinate and communicate the right services, in the right places, at the right cost so as to maintain optimum health and function)

5. Marketing (Public Education)

- a) *Brochures/ Leaflets*. (various dates). (Public Access). Describes products and services and are available at the Department and online HIP.gov.bm
- b) Town Hall Meetings on HIP and FutureCare (held at advertised/ promulgated venues)
- c) Student Debate on FutureCare

Section E: Administration (all public access) manuals [s5(1)e]

Insert list and description of all administrative manuals/ guidelines used by employees for administering or carrying-out activities:

1. *Financial Instructions*. (2014). (Public Access). Fiscal policy circulated by the Accountant General to all government ministries and departments
2. *Operational Procedures documentation*. (various dates). (Public Access). Administrative and operational procedures that guide the Department's daily functions and ensure operational consistency –
 - a) *Business Rules (also decision making document)* – captures all operational policy, legislative guidelines and approved procedures
 - b) *Benefit Templates* – Department-approved rates of payment for provider fee schedules
 - c) *Forms* – Operation templates used to convey in-house information and to obtain information/data from applicants/ the public
 - d) *Job Aides* – Orientation and procedural aides for new hires
 - e) *Letters* – Operational and administrative correspondence
 - f) *Memoranda* – Operational and administrative correspondence
 - g) *Project Change Request Orders* – procedural document to approve business changes
 - h) *Project Planning Templates* – ongoing project team work, post automation

- i) *Reference Documents* – mainly historical administrative data
- j) *Training Materials* – operational binders containing guidelines for job trainers, job aides, workflows, work flow narratives, business rules, etc.
- k) *Transition Document Templates* – ongoing project team work, post automation
- l) *Workflow & Workflow narratives* – diagrams and explanatory notes depicting operational procedures for work types

Section F: Decision-making documents [s5(1)f]

Insert list and description of all policies and guidelines for decision making in respect to any person. Note “person” includes any company or association or body of persons, whether corporate or unincorporate; [Interpretation Act, 1951]

Legislation

1. *Health Insurance Act.* (1970). (Public Access). The main Act providing policy direction to the Health Insurance Department
2. *Health Insurance (Standard Health Benefits) Regulations.* (1971). (Public Access). Regulations that apply to all local health insurers
3. *Health Insurance (Health Insurance Plan) (Additional Benefits) Order.* (1988). (Public Access). The Order for HIP supplemental benefits providing coverage over and above the standard benefits
4. *Health Insurance (FutureCare Plan) (Additional Benefits) Order.* (2009). (Public Access). The Order for FutureCare supplemental benefits providing coverage over and above the standard benefits

Policy

5. *Financial Instructions.* (March 2013). Bermuda Government (Public Access). Fiscal policy circulated by the Accountant General to all government ministries and departments. *(also an administrative document)*
6. *Procurement and Tendering Guidelines.* (various dates). Bermuda Government (Public Access). Information circulated by the Central Policy Unit to promote procurement vigilance within the public service

Legal

7. *Contractual and legal documents.* (various dates). (Public Access). Legally binding agreements between the Department and business partners and other parties

Administration

8. *Health Insurance Department Business Plan.* (under review). (Public Access). Organization and Operation Strategy

Minutes

9. *The Committee Minutes*. (2010, earliest). (Public Access). Contains decision making resolutions recorded at monthly business meetings or at special Committee
10. *Departmental Meeting Minutes*. (various dates). (Public Access). Records details of internal and external meetings attended

Human Resources

11. *Human Resource Policies*. Including the *Code of Conduct and Conditions of Employment, Dignity at Work Policy, Bermuda Public Services Union Collective Bargaining Agreement*

Section G: How to Contact the Information officer and Make a Request [s5(1)g and (h)]

Insert process, name and contact information:

How to make a request for information, or to amend your personal information

Requests must be made using the application form and submitted in person to the Information Officer. You must also provide Government-issued identification to prove that you are a Bermudian or a resident of Bermuda, such as a passport or Bermuda driver's license. The process and application form are located at: <https://www.gov.bm/online-services/make-pati-request>

A request must identify the record, the subject and time period. Requests should specify the manner in which access is preferred, for example by inspection or by copy. There is a fee charged for reproducing materials (see list of fees on the PATI website at: <https://www.gov.bm/pati-service-fees>).

Your request will be acknowledged within 5 days. The Public Authority has 6 weeks to make a decision regarding the request. Access to the record may be provided in full, in part or denied. If you are not satisfied with the outcome you may appeal the decision via several mechanisms: an Internal Review by the head of the Authority, an External Review by the Information Commissioner, and a Judicial Review in the Supreme Court. These processes are described on the PATI website (<https://www.gov.bm/public-access-information-pati>).

Contact	PATI Information Officer, Ms. Rhonda Allen c/o Ministry of Health and Seniors Re: <i>Health Insurance Department</i> , Attention: Ms. Rhonda Allen,
Hand deliver to	2 nd Floor, Sofia House, 48 Church Street, Hamilton
Mail*	P.O. Box HM 2160, Hamilton HM CX, Bermuda
Email*	rvallen@gov.bm
Tel	295-9210

* Note requests for information will only be accepted for submissions made in-person so as to verify the requestor's identity.

Section H: Other Information [s5(1)h]

Insert any other information that you think might be useful for the public to know, so as to decrease requests for information [s6]:

1. **About us** is available on the Department website <https://www.gov.bm/department/health-insurance> .
2. **Annual Budget:** For the annual expenditure for the past fiscal period (31st Mar to 1st Apr), see the online Budget Book at: (<https://www.gov.bm/20162017-budget-page>; then select the “Budget Book”; then select: Section B - Current Account Estimates; then select the Ministry).
3. The **legislation** listed in this document may be found at Bermuda Laws Online www.bermudalaws.bm.

Section I: Other Information As Prescribed [s5(1)i]

At Dec 2014 there are no Regulations to specify additional requirements for the Information Statement. But note, that the following shall be provided in accordance with s6 of the PATI Act:

1. **Log of PATI** information access requests: To be provided upon request and with personal identifiers deleted.
2. **Contracts:** Any contracts entered into, with a value greater than or equal to \$50,000 [s6(6)].
3. **Expenditure:** Quarterly expenditure will be provided upon request. Note the expenditure for the previous fiscal period is provided on the website (as per Section H)
4. **Salaries:** The Minister responsible for PATI shall publish a list of title and salary range of every post of public officers [s6(6)].

Section J: Information Statement: Copies and Updates [s5(2,3,4,5)]

Every public authority shall update its information statement at least once a year, and make it available for inspection by the public at reasonable times at [s5(2-5), PATI Act]:

Locations of Information Statement (*Confirm copies of Information Statement are available at*):

- Office: Sofia House, 48 Church Street, Hamilton Y
- The Bermuda National Library Y
- The Bermuda Archives Y
- Available electronically at:
 - PATI website <https://www.gov.bm/public-access-information-pati> Y
 - Department website <https://www.gov.bm/department/health-insurance> Y
- With the Information Commissioner Y

Have you published a notice in the Gazette indicating the places where the information Statement is available for the public? Y

Date Information Statement was updated:

Date: 1st November 2016

Sign:

L. Burrows 12/22/2016

Name:

L. Burrows,

Post:

Director, Health Insurance Department

Ends