

Compliance Plan

FISCAL YEARS 2014-15 AND 2015-16

June 17, 2014

| Activity | Objectives and Initiatives | Fiscal Year | |
|--|--|-------------|---------|
| | | 2014-15 | 2015-16 |
| Compliance Controls | <p>Objective: Test ICOR compliance activities to determine adherence to laws, regulations, rules and policies.</p> <p>Initiative: Conduct targeted reviews of investment compliance controls and delegated authorities.</p> | Q1-Q3 | Q2-Q4 |
| Policies and Procedures | <p>Objective: Determine compliance related to established INVO policies and procedures.</p> <p>Initiative: Review compliance with INVO policies and procedures over travel, restricted trading list access and compliance management systems.</p> | Q2-Q4 | Q1-Q3 |
| Exceptions Monitoring | <p>Objective: To ensure policy compliance through effective monitoring of exceptions alerts and follow through of corrective actions.</p> <p>Initiative: Review alerts cleared through compliance management systems for adherence to INVO policies.</p> | Monthly | Monthly |
| Patient Protection and Affordable Care Act (ACA) | <p>Objective: To ensure compliance to the Patient Protection and Affordable Care Act (ACA).</p> <p>Initiative: Test compliance over provisions of ACA implemented in 2013-14.</p> | Q4 | |
| Confidential Information Management | <p>Objective: To ensure that the management of confidential information under the Health Insurance Portability and Accountability Act (HIPAA).</p> <p>Initiative: Test compliance with laws, rules, regulations, policies and procedures for Divisions processing confidential HIPAA-protected documents.</p> | Q3 | Q3 |
| Contracting and Procurement | <p>Objective: Ensure compliance related to the managing of contracts and procurement processes.</p> <p>Initiative: Test compliance with applicable laws, rules, regulations, policies and procedures for contracting and procurement processes in INVO, Information Technology Services Branch (ITSB) and Operations Support Services Division (OSSD).</p> | Q1-Q3 | Q2-Q4 |

Special Projects

Objective: To be responsive to regulatory and policy changes requiring compliance review and monitoring.

As needed As needed

Initiative: Conduct ad hoc compliance reviews and special projects based on changes to laws, rules, regulations and policies and consultation with management.

Citizen Complaint Act Monitoring and Reporting

Objective: Compliance with the law for citizen complaints and provide ongoing monitoring, outreach and administrative support.

Q2

Initiative: Establish a dedicated web portal.

Automated Tool Solution

Objective: Enable users across business silos to collaborate and align using common data and processes.

Q4

Initiative: Implement RSA Archer compliance and incident management solution for:

- Compliance review process
- Incident management (intake, triage and status)

