



## GOVERNMENT OF BERMUDA

### Ministry of Health

## 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 Officer. 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
- 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]**

**Health Insurance Department (25)**

**Main Business Partners:**

**Sutherland Global**

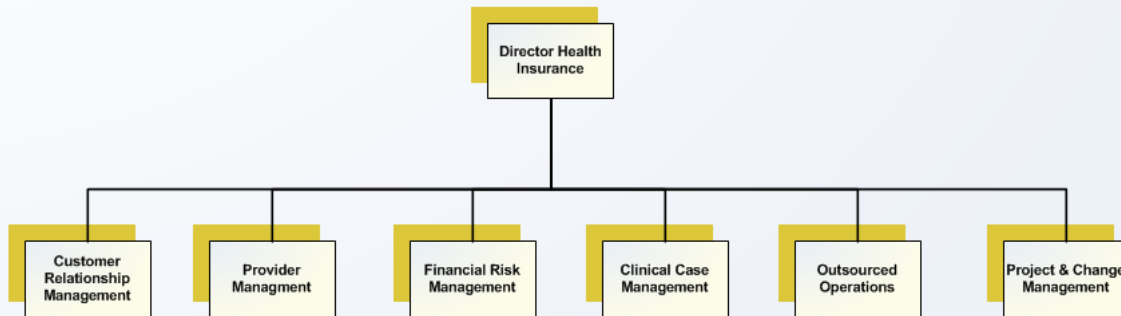
Administrator of the health administration system and outsourcing partner for back office processes

**Argus Insurance Group**

HIP & FutureCare Dental Plans Mgt.

**Global Medical Management Incorporated**

Case management for overseas care



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 one (1) of which is seconded outside HID. Seventeen (17) individual consultancy contracts are currently issued along with Statements of Work to four (4) main business partners for outsourced services and functions. The Department is the sole administrator of public health insurance in Bermuda.

**Department Sections:** Customer Relationship Management, Provider Management, Financial Risk Management, Clinical Case Management, Outsourced Operations and Project and Change Management.

**Sub-Programs:**

Health Insurance Administration

**Cost center:**

101000

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

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

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 administers two (2) private funds on behalf of the Committee namely the Health Insurance Fund and the Mutual Reinsurance Fund along with administration of all Government subsidy claims under the Consolidated Fund.

The Department is governed by the Committee.

### 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 and the Mutual Re-Insurance Fund;
- c) to investigate and decide on such claims;
- d) to authorize the payment of claims which have been approved by it;
- e) to manage and keep under 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 Funds: inclusive of the Health Insurance Fund (Health Insurance Plan HIP and FutureCare Plan), the Mutual Reinsurance Fund (MRF) and Subsidy Entitlement –
  - **Health Insurance Plan (HIP)** – is 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. Under the Health Insurance Plan three (3) insurance packages are offered:
    - HIP
    - HIP Youth
    - HIP non-subsidized
  - **FutureCare Plan** – is an affordable health plan for seniors' age sixty-five (65) and above 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)** – as part of the standard premium the Mutual Reinsurance Fund collects, on behalf of each insured person, a monthly prescribed amount from licensed insurers and every employer who operates an approved scheme.  
  
The Fund covers dialysis, kidney transplant services and anti-rejection drugs.

- **Government Subsidy Entitlement** [Part 1, Section 2 of the Health Insurance Act] is applicable to standard health benefits and prescribed as follows: youth and the indigent 100%, ages 65 -74 70% and ages 75+ 80%

- b) Collects premiums for HIP, FutureCare and MRF
- c) Accounting, reporting and investment of funds under management
- d) Receives and adjudicates claims
- e) Maintains a database of individuals qualified for subsidy entitlement
- f) Provides support to Bermuda Health Council and Ministry of Health
- g) Engages actuarial review services and vendor services
- h) Determines eligibility for certificate of entitlement
- i) Monitors employer compliance with health insurance legislation

The Department provides customer facing services, collects premiums, receives and adjudicates claims. Eligibility and enrollment status is maintained for policyholders, including billing, individual reimbursement and administration of identification cards. The Department also maintains a database of those persons who qualify for aged subsidy (Certificate of Entitlement).

The Department administers its program from the annual budget appropriated from the Consolidated Fund (via a capital injection) and premium receipts; whilst recording and paying its administrative expenses through government.

The Department also coordinates the reimbursement of the Consolidated Fund from many other funds under management. The Department engages outside actuaries to conduct a quarterly and annual review of its statistical indicators, financial trends, claims experience, premium rates and expenses in addition to recommending reserves.

The Department collaborates with inter-Government and industry stakeholders to work through strategic issues in addition to providing support and resources to the Ministry of Health and the Bermuda Health Council.

### **3. Decision Making**

The Committee provides governance and oversight of the management of the Health Insurance Fund. It is an appointed body under the Health Insurance Act. The Head of Department (i.e. the Director) functions as a Committee Ex Officio member (by virtue of office).

Government subsidies are provided through the Consolidated Fund, administered by the Department and regulated under the Act.

A detailed list of decision making documents are listed in **Section F**.

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

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 Programs [s5(1)c]

The Department's products, programs, services and other activities are listed in further detail below.

### Products and Core Activities

- a) *Health Insurance Plan (HIP)*
  - Allows monthly, quarterly, biannual and annual premium payment plans
  - A public insurance plan available to individuals and groups without medical underwriting
  - Available to persons of any age
  - Benefits include in-patient hospital services, out-patient care and supplemental benefits (including personal home care, wellness programs and dental).
- b) *Future Care Plan*
  - Allows monthly, quarterly, biannual and annual premium payment plans
  - Available to individual persons aged 65 and over
  - Benefits include in-patient hospital services, out-patient care and supplemental benefits (including personal home care, wellness programs, dental, prescription drugs).
- c) *Mutual Reinsurance Fund (MRF)*

- Collects, on behalf of each insured person, a monthly prescribed sum from licensed insurers and every employer who operates an approved scheme.
- Adjudicates claims for dialysis, kidney transplant services and anti-rejection drugs

*d) Government Subsidy Entitlement*

- Administers hospital subsidies for youth (100%), indigent (100%) and the aged (70% at ages 65 – 74 and 80% at age 75+)
- Funded by the Consolidated Fund

**Programs**

*Health Insurance Administration - Cost Centers 101000*

This program funds the daily operations and management of the government’s health insurance products and services offered to the public. This program provides a mechanism to deliver core services to policyholders.

The Department engages in many activities related to administration of the funds and subsidy entitlement; these include 1) product/business development; 2) claims management; 3) financial management; 4) operations/project management; and 5) relationship management.

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

**Service Information**

Dental plan benefits for HIP and FutureCare plans are administered by the Argus Insurance Group of Companies. Argus will adjudicate claims and manage dental related customer enquiries.

Overseas treatment for HIP and FutureCare policyholders is managed by Global Medical Management Incorporated (GMMI). The activities that GMMI perform are related to medical care management, negotiation of discounts, facilitating utilization of preferred provider facilities and healthcare consumer education. GMMI services HIP and FutureCare policyholders and their healthcare advocates. GMMI must be the policyholder’s first point of contact following a local physician referral for overseas treatment. GMMI is overseen by the departments nursing leadership.

General enquires on the administrative services of the Department may be made to the Health Insurance Department C/O Customer Service division, Sofia House, 2<sup>nd</sup> Floor, 48 Church Street, Hamilton.

**Other**

The Department engages in various activities, such as:

- Public Opinion Surveys
- 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*. (various dates/Fiscal Years). (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*. (various dates/Fiscal Years). (Public Access). A Ministry of Finance publication that follows the annual Budget Speech in the House of Assembly by the Minister of Finance.
- 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 the Health Insurance Fund and Mutual Reinsurance Fund financial activities.
- e) *Bank Statements*. (various dates). (Public Access). Generated by HSBC and the Bank of N.T. Butterfield for all the Funds managed.

### 2. Annual Reports

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

### 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)
- d) *Job Descriptions*. (various dates). (Public Access)
  - Civil Service – BPSC position I.Ds for HID are filed with the Department of Human Resources and within HID
  - Consultant Contracts – positions agreed between the Department and individual consultants are filed within HID

### 4. Operational

- a) *Applications for insurance, change request forms and receipts of payment.* (various dates). (Public Access).
- b) *Provider and policyholder correspondence.* (various dates). (variable Public Access)
- c) *Claims and supporting medical information.* (various dates).

## 5. Marketing (Public Education)

- a) *Brochures/ Leaflets.* (various dates). (Public Access). Describes products and services and are available at the Department and online <https://www.gov.bm/department/health-insurance>

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

- 1. *Financial Instructions.* (current version). (Public Access). Fiscal policy circulated by the Accountant General to all government ministries and departments.
- 2. *Operational Procedures documents.* (various dates). (Public Access). Administrative and operational procedures that guide the Department's daily functions and ensure process and procedure consistency.

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

### Legislation

The following Acts, Orders and Regulations provide direction to the Health Insurance Department:

- 1. Health Insurance Act 1970
- 2. Health Insurance (Audit Of Account) Regulations 1971
- 3. Health Insurance (Approved Schemes) Regulations 1971
- 4. Health Insurance (Certificate of Entitlement) Regulations 1971
- 5. Health Insurance (Cover) Regulations 1971
- 6. Health Insurance (Delegation of Powers) Notice 2016
- 7. Health Insurance (Double Cover) Regulations 1971
- 8. Health Insurance (Exemption) Regulations 1971
- 9. Health Insurance (FutureCare Plan) (Enrolment) Order 2011
- 10. Health Insurance (FutureCare Plan) (Premium) Order 2015
- 11. Health Insurance (Health Insurance Plan) (Premium) Order 2015
- 12. Health Insurance (Health Service Providers and Insurers) (Claims) Regulation 2012
- 13. Health Insurance (Inspection of Records) Regulations 1971
- 14. Health Insurance (Licensing of Insurers) Regulations 1971
- 15. Health Insurance (Mutual Re-insurance Fund) (Prescribed Sum) Order 2014
- 16. Health Insurance (Mutual Re-insurance Fund Payments) Transitional Arrangements Regulation 2019
- 17. Health Insurance (Procedure For Subsidy Payments) Regulations 1971
- 18. Health Insurance (Plans) Regulations 1987
- 19. Health Insurance (Statistical Reports) Regulations 2010
- 20. Personal Information Protection Act 2016



The following Orders and Regulations define the benefits covered under the Standard Health Benefit and the HIP and FutureCare Plans' supplemental benefits:

21. Health Insurance (Standard Health Benefits) Regulations 1971
22. Health Insurance (Artificial Limbs and Appliances) Regulations 1971
23. Health Insurance (Maternity Benefit) Regulations 1971
24. Health Insurance (Mental Illness, Alcohol and Drug Abuse) Regulations 1973
25. Bermuda Hospitals Board (Medical and Dental Charges) Order 2018
26. Bermuda Hospitals Board (Hospital Fees) Regulations 2018
27. Health Insurance (Health Insurance Plan) (Additional Benefits) Order 1988
28. Health Insurance (FutureCare Plan) (Additional Benefits) Order 2009

All the aforementioned Acts, Orders and Regulations are available for public access at [www.bermulaweb.com](http://www.bermulaweb.com).

### **Policy**

1. *Financial Instructions*. (current version). Bermuda Government (Public Access). Fiscal policy circulated by the Accountant General to all government ministries and departments. (*also an administrative document*).
2. *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**

1. *Contractual and legal documents*. (various dates). (variable Public Access). Legally binding agreements between the Department, business partners and other parties and correspondence to/from legal professionals.

### **Administration**

1. *Business Rules (also administrative and decision making documents)*. (various dates). (Public Access). Captures all operational policies, legislative guidelines and approved procedures.
2. *Requirements Documentation*. (various dates). (Public Access). Guidelines prepared by the Project and Change Management Teams for continued operations with respect to various new or revised business needs or processes.
3. *Benefit Templates*. (various dates). Department-approved rates of payment and provider fee schedules.
4. *Forms*. (various dates). Standardized format templates used to convey information and to obtain information/data from applicants/ the public.
5. *Job Aides*. (various dates). Orientation and procedural aides for staff.
6. *Letters*. (various dates). Operational and administrative correspondence.

7. *Memoranda*. (various dates). Operational and administrative correspondence.
8. *Project Change Request Orders*. (various dates). Procedural document to approve business changes.
9. *Project Planning Templates*. (various dates). Ongoing project team work, pre and post automation.
10. *Reference Documents*. (various dates). Mainly historical administrative data.
11. *Training Materials* – operational binders containing guidelines for job trainers, job aides, workflows, work flow narratives, business rules, etc.
12. *Transition Document Templates* – ongoing project team work, post automation
13. *Workflow & Workflow narratives* – diagrams/explanatory notes depicting operational procedures

### **Minutes**

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

### **Human Resources**

1. *Human Resource Policies*. (various dates). Includes 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)]**

### **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>).

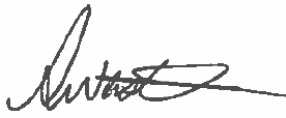
Contact	PATI Information Officer c/o Ministry of Health Re: <i>Health Insurance Department</i> ,
Hand deliver to	2 <sup>nd</sup> Floor, Sofia House, 48 Church Street, Hamilton
Mail*	P.O. Box HM 2160, Hamilton HM JX, Bermuda
Email*	<a href="mailto:HIP@gov.bm">HIP@gov.bm</a>
Tel	295-9210
* Note requests for information will only be accepted for submissions made in-person so as to verify the requestor's identity.	
<b>Section H: Other Information [s5(1)h]</b>	
<ol style="list-style-type: none"> <li>1. <b>About us</b> is available on the Department website <a href="https://www.gov.bm/department/health-insurance">https://www.gov.bm/department/health-insurance</a> .</li> <li>2. <b>Annual Budget:</b> The annual expenditure for the past fiscal period (31<sup>st</sup> Mar to 1<sup>st</sup> Apr), may be viewed online using the 'Budget Book' (<a href="https://www.gov.bm/20182019-budget-page">https://www.gov.bm/20182019-budget-page</a>; then select the 'Budget Book' then select: 'Section B - Current Account Estimates' then select the Ministry).</li> </ol>	
<b>Section I: Other Information As Prescribed [s5(1)i]</b>	
<ol style="list-style-type: none"> <li>1. <b>Log of PATI</b> information access requests: To be provided upon request and with personal identifiers deleted.</li> <li>2. <b>Contracts:</b> Any contracts entered into, with a value greater than or equal to \$50,000 [s6(6)].</li> <li>3. <b>Expenditure:</b> Quarterly expenditure will be provided upon request. Note the expenditure for the previous fiscal period is provided on the website (as per Section H).</li> <li>4. <b>Salaries:</b> The Minister responsible for PATI shall publish a list of title and salary range of every post of public officers [s6(6)].</li> </ol>	
<b>Section J: Information Statement: Copies and Updates [s5(2,3,4,5)]</b>	
<b>Locations of Information Statement</b>	

- Office: Sofia House, 48 Church Street, 2<sup>nd</sup> Floor, Hamilton
- The Bermuda National Library
- The Bermuda Archives
- Available electronically at:
  - PATI website <https://www.gov.bm/public-access-information-pati>
  - Department website <https://www.gov.bm/department/health-insurance>
- With the Information Commissioner

**Date Information Statement was updated:**

*Date:* Dec 15 2020

*Sign:*



*Name:*

Shivon Washington

*Post:*

Acting Director, Health Insurance Department

*Ends*