THE ISO CLAIMSEARCH® DATA PROTECTION INITIATIVE

As trusted stewards of the property and casualty industry's claims, ISO ClaimSearch is charged with ensuring customers' data is securely protected. We adhere to the highest privacy and security standards, and, as part of our ongoing vigilance to safeguard vital and sensitive information, ISO ClaimSearch has begun a multi-year initiative to further reduce risks associated with data use, especially new and developing data risks that threaten all industries involved in digital exchange and information storage.

The next steps in our data protection initiative include partially masking personally identifiable information (PII). To help customers through the transition, we've prepared a list of Frequently Asked Questions (FAQs).

Partial Masking of Personally Identifiable Information (PII) Frequently Asked Questions (FAQ)

IMPORTANT DATE – JUNE 11, 2018

Questions

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Questions and Answers

1) WHICH PII FIELDS WILL BE PARTIALLY MASKED?

In addition to the social security number (SSN), which has been partially masked on all data output since 2008, these data elements will be partially masked on the echo of the initiating company's claim and on all matching claims:

- Date of birth – only the year will be displayed; the month and day will be masked
- TIN – only the last four digits will be displayed; the first five digits will be masked
- Driver's license – only the last three characters will be displayed; the other characters will be masked

2) HOW DID ISO CLAIMSEARCH DETERMINE WHICH FIELDS TO PARTIALLY MASK?

We'll partially mask information that's considered PII when returned in combination with an individual's name. In doing so, we seek to further protect consumers' sensitive information that could be leveraged for malicious means if any of the sensitive information is breached.

3a) HOW DO THESE CHANGES AFFECT ME IF I REPORT VIA THE ISO CLAIMSEARCH WEBSITE?

Data protection is a concern regardless of which reporting method you use. As of June 11, 2018, traditional web match reports will be replaced by visualized ISO ClaimSearch where partial masking is already in place.

3b) HOW DO THESE CHANGES AFFECT ME IF I SUBMIT CLAIMS VIA PDF OUTPUT?

ISO ClaimSearch will automatically implement partial masking on all PDF match reports. No technical changes are required by you; however, from a business perspective, you should ensure that your users are aware that the PII fields will be partially masked, to address any potential changes to their investigation techniques or workflow.

The partial masking will apply to all involved parties, AKAs, service providers and additional claimants for Medicare Section 111 reporting on **both the echo** of your own initiating claim and on **all matching claims**.

The fields will be partially masked as follows:

EX: DATE OF BIRTH: XX/XX/2018

TIN: XX-XXX1234

DRIVER'S LICENSE: XXXXXXXXXX123

3c) HOW DO THESE CHANGES AFFECT ME IF I SUBMIT CLAIMS VIA AN AUTOMATED FTP or MQ INTERFACE AND USE THE RAW OUTPUT?

ISO ClaimSearch will begin passing the response files with the partially masked PII on the echo of your initiating claim and on the matching claims.

The records that the masking will apply to are as follows:

ECHO

- MO01 (Echo of Parties to the Loss)

- MK01 (Echo of AKA/Additional Address Information)
- MSP1 (Echo of Service Provider Information)
- MACL (Echo of Additional Claimant for Medicare Section 111 Reporting)

<u>MATCHING CLAIMS</u>

- MO02 (Match Return – Parties to the Loss)
- MK02 – (Match Return – AKA/Prior Address Information)
- MSP2 (Match Return – Service Provider Information)

The fields will be partially masked with zeroes passed for the date of birth and TIN and X's passed for the driver's license.

EX: DATE OF BIRTH: 00002018

TIN: 000001234

DRIVER'S LICENSE: XXXXXXXX123

Your company should perform testing to ensure that the masking will not cause problems to your systems, and/or, you may need to make programmatic changes for the display of these fields to your users or if you utilize the data for approved analytical purposes.

Additionally, from a business perspective, you should ensure that your users are aware that the PII fields will be partially masked in order to address any potential changes to their investigation techniques or workflow.

3d) HOW DO THESE CHANGES AFFECT ME IF I SUBMIT AND RECEIVE CLAIMS VIA XML WEB SERVICES?

ISO ClaimSearch will begin passing the response files with the partially masked PII on the echo of your initiating claim and on the matching claims.

The aggregates that the masking will apply to are as follows:

- DRIVER'S LICENSE: <DriversLicenseNumber>
Only the last three characters will be displayed; the other characters will be masked with "X" in the XML response and on the XML Style sheet.   EX: XXXXXXX123

- DATE OF BIRTH: <BirthDt>

Once the masking is activated on either the ECHO and/or RESPONSE, the <BirthDt> tag will no longer be returned on output. Instead, a new tag will be sent, <com.iso_MaskBirthDt> and only the four-digit year will be passed on this new tag.

The reason a new tag was added is because in XML coding, a birth date format containing zeroes in the date and month would be considered invalid XML, so we have added a new tag which will only display the birth year.

IMPORTANT: *Due to the addition of the new tag, programming changes will be required if you utilize the XML response within your system.*

The PII will be masked on the Involved Party, Alias and Service Provider aggregates.

If your company uses the XML Style sheets, the existing version of your style sheets will not break, however, if the new aggregate for the date of birth year <com.iso_MaskBirthDt> is passed to you, it will not display on the current version of

the style sheet, so you could miss valuable information. New style sheets are available for installation in your system to properly display the masked fields.

Your company should perform testing to ensure that the masking will not cause issues in your systems, and/or you may need to make programmatic changes for the display of these fields to your users if you have developed your own match reports or if you utilize the data for approved analytical purposes.

Additionally, from a business perspective, you should ensure that your users are aware that the PII fields will be partially masked to address any potential changes to their investigation techniques or workflow.

3e) HOW DO THESE CHANGES AFFECT ME IF I USE VISUALISED ISO CLAIMSEARCH?

We have already made changes in visualized ISO ClaimSearch. The PII fields are partially masked for all users designated as claims users. We know that SIU are privileged users with a need to sometimes see this information, so they are granted additional permissions. Users designated as SIU see the PII fields as masked but can reveal the unmasked PII through an extra click on an as-needed basis. To ensure that users are unmasking data appropriately and abiding by company policies, ISO ClaimSearch will track unmasking activity and share usage reports with home office contacts when appropriate.

3f) HOW DO THESE CHANGES AFFECT ME IF I USE THE CLAIMS INQUIRY APPLICATION ON THE CLAIMSEARCH WEBSITE?

Changes have already been implemented in Claims Inquiry. The PII fields are partially masked for all users designated as claims users. We know that SIU are privileged users with a need to sometimes see this information, so they are granted additional permissions. Users designated as SIU see the PII fields as masked but can reveal the unmasked PII through an extra click on an as-needed basis. To ensure that users are unmaking data appropriately and abiding by company policies, ISO ClaimSearch will track unmasking activity and share usage reports with home office contacts when appropriate.

4) CAN I CONTINUE TO RECEIVE PII FIELDS UNMASKED?

By default, partial masking will apply to the echo of your initiating claim with the ability to receive the fields unmasked on the echo if you would like to continue to receive back the values that were passed to us by your company. If you would like to receive these fields unmasked on the echo, please contact ClaimSearchReporting@verisk.com. For the best protection of sensitive data, we suggest you receive the fields as masked.

There will not be an option to receive the fields unmasked on matching claims; partial masking will apply to all matching claims.

5) WHAT SHOULD I DO IF I AM A CLAIMS USER WHO NEEDS TO SEE THE UNMASKED DATA FOR A CLAIM INVESTIGATION?

Since SIU users are privileged users with the ability to access the data unmasked through Claims Inquiry or visualized ISO ClaimSearch, you should reach out to your special investigators, so they can provide the information to you.

6) WILL THE REJECTION FILES/RESPONSES BE AFFECTED?

No, since the rejection files/responses only echo back the information you submitted on input, the information will not be masked because you may need to see the information that was submitted on input in case any corrections are needed to that data. ISO ClaimSearch will consider future optional masking of these fields for customers who would like to receive the PII fields partially masked on the rejected claims as well for added data protection.

7) MY COMPANY USES THE APPEND-DS SERVICE TO OBTAIN SOCIAL SECURITY NUMBERS; WILL APPEND DS BE AFFECTED?

Currently there are no changes to Append DS. Since the Append DS service performs a public records search to identify the SSN (and sometimes DOB) associated to your involved parties, we must continue to return this information to you, so you can add it to your claim. You will continue to receive the SSNs and DOBs returned to you unmasked via all methods.

8) WILL THE HICN FIELD BE AFFECTED FOR MEDICARE SECTION 111 REPORTING IN ISO CLAIMSEARCH?

There will not be any changes to the HICN field. As CMS announced, the HICN will soon be replaced by a Medicare Beneficiary ID (MBI), which will reduce the risks associated with the HICN field continuing to be sent unmasked. The HICN is provided on the echo of your own claim and on CMS query and quarterly response files. It is never provided on matching claims from other companies.

9) HOW WILL THIS AFFECT CLAIMDIRECTOR?

The only change is that two of the rules which include results on the driver's license will include the partial masking, and this only affects Legacy ClaimDirector customers. For example, the rule PII will be masked as follows:

> *Rule 19 Including this loss, this involved party's Driver's License number XXXXXXX123 is linked to x or more names in the ClaimSearch database*

> *Rule 103 A data element(s) reported for this involved party appears to match a data element reported on your company's Advisory List. The driver license number is XXXXXXX123; NJ*

Visualized ClaimDirector, however, is currently displaying the PII in the rules below.

> *Rule 19 Including this loss, this involved party's Driver's License number 1111111123 is linked to x or more names in the ClaimSearch database*

> *Rule 103 A data element(s) reported for this involved party appears to match a data element reported on your company's Advisory List. The driver's license number is 1111111123; NJ*

10) WHEN CAN I BEGIN TESTING THESE CHANGES?

The changes for XML output, XML style sheets, FTP/MQ output and PDF match reports are currently available in the ISO ClaimSearch acceptance test environment.

For companies who have programmed their own output or use the output files for approved analytical purposes, we strongly recommend you perform testing to ensure your system will be able to handle the partially masked data elements.

The test system is available now. If your company is ready to begin testing, please contact us at claimsearchreporting@verisk.com to be activated for the masking changes in acceptance. **Any company who has not requested to be activated in acceptance will be automatically switched in acceptance on May 11, 2018**.

If you need more information on how to access the test environment, please contact us at claimsearchreporting@verisk.com.

11) WHEN ARE THESE CHANGES REQUIRED IN PRODUCTION?

Companies may test the changes between now and June 10, 2018. On June 11, 2018, all companies will automatically be turned on for the partial masking in production. If your company has completed testing successfully and is ready to

move to production prior to June 11, please contact us at claimsearchreporting@verisk.com to be activated in production.

12) MY COMPANY USES A VENDOR CLAIM SYSTEM WITH AN INTERFACE to ISO CLAIMSEARCH; HOW DOES THIS IMPACT MY INTERFACE?

If your company uses a vendor claim system with integration to ISO ClaimSearch, please pass this important information to the vendor so they can prepare for any changes that may impact the interface. ISO ClaimSearch has reached out to many of the claim system vendors, however, to ensure these changes will get the required attention, it is important that you make sure your vendor has a plan to address this change. If your claim system vendor would like to further discuss these changes, please inform them to contact us at claimsearchintegration@verisk.com.

13) WILL THE CHANGES AFFECT COMPANIES THAT USE THE MATCHING CLAIMS DATA FOR APPROVED ANALYTICAL PURPOSES (EX: FRAUD DETECTION MODELS)?

ISO ClaimSearch realizes that the data may be important to your organization for continued use in your approved analytic fraud detection models. The SSN has been partially masked since 2008 and we are not aware of any negative impacts that change has had on organizations, so the additional masking of these optional fields is an extension of that change. Since the fields will only be partially masked and will still be sent in conjunction with the name/address, it is our hope that your models will still be able to verify the identity of the individuals, although your models may need to be adjusted to handle the partially masked fields. For example, although you will not see the month and day of the date of birth, with the year you would be able to distinguish between a father and son.

14) WHO NEEDS TO BE AWARE OF THESE CHANGES?

HOME OFFICE CONTACTS – Home Office contacts need to ensure that their end users are aware of the changes and convey the important reason these changes are being implemented. You should ensure that your users have the information and training they need to be able to continue their claim investigations as well as to convey any workflow changes required. You should notify your IT department and/or claim system vendor to investigate if technical changes are required and to perform testing, if necessary.

CLAIM ADJUSTERS – Adjusters need to understand the changes and any new processes that will be expected as a result.

SPECIAL INVESTIGATORS – SIU users may need to perform searches on behalf of claims users who have a need on a particular case to see unmasked information.

IT PROGRAMMERS/DATA ANALYTICS TEAMS – IT Departments should evaluate if any technical changes are required and perform testing to assess the impact to your organization.

COMPLIANCE PROFESSIONALS – Compliance professionals should explain to users within their company the important reasons for the data protection initiative.

CLAIM SYSTEM VENDORS – Claim system vendors should evaluate if any technical changes are required and perform testing to assess the impact on the organizations that utilize their interface to access ISO ClaimSearch.

15) WHERE CAN I FIND THE TECHNICAL DOCUMENTATION?

In the ISO ClaimSearch Learning Center, you'll find user guides that contain all the technical information you'll need. The Universal Format Manual can be downloaded here, and the XML Data Power Manual can be downloaded here. You also can request manuals by contacting us at ClaimSearchreporting@verisk.com.

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16) WHO DO I CONTACT FOR MORE INFORMATION OR WITH ANY CONCERNS?

Please contact us at ClaimSearchreporting@verisk.com with any questions or concerns.