

Independent External Audit:
MNsure
State of Minnesota
July 1, 2023 – June 30, 2024
Audit Findings Report

MINNESOTA AUDIT FINDINGS REPORT

Independent External Audit: 2024 Findings Report

TO: CCIIO STATE EXCHANGE GROUP

FROM: BDMP ASSURANCE, LLP (BERRYDUNN)

DATE: MAY 20, 2025

SUBJECT: AUDIT FINDINGS REPORT FOR MINNESOTA

AUDIT PERIOD: JULY 1, 2023 – JUNE 30, 2024

I. EXECUTIVE SUMMARY

PURPOSE:

The purpose of this independent external audit is to assist the State of Minnesota in determining whether MNsure, the Minnesota State-Based Marketplace (SBM), was in compliance with the programmatic requirements set forth by the Centers for Medicare & Medicaid Services (CMS) during the audit period.

Name of SBM: MNsure

State of SBM: Minnesota

Name of Auditing Firm: BerryDunn

Our responsibility was to perform a programmatic audit to report on MNsure's compliance with Title 45, Code of Federal Regulations, Part 155 (45 CFR 155) as described in the CMS memo dated June 18, 2014, Frequently Asked Questions about the Annual Independent External Audit of SBMs. The Program Integrity Rule Part II ("PI, Reg."), 45 CFR 155.1200 (c), states, "The State Exchange must engage an independent qualified auditing entity which follows U.S. generally accepted governmental auditing standards to perform an annual independent external programmatic audit and must make such information available to the United States (U.S.) Department of Health and Human Services for review."

SCOPE:

The scope of this engagement included an examination of MNsure's compliance with the programmatic requirements under 45 CFR 155, Subparts C, D, E, K, and M for the 12 month period July 1, 2023, through June 30, 2024. We conducted our examination in accordance with U.S. generally accepted auditing standards and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States. We completed an examination of MNsure's compliance with the applicable programmatic requirements under 45 CFR 155 and issued our reports dated May 20, 2025.

We reviewed processes and procedures, read pertinent documents, and performed inquiries, observations, and staff interviews to obtain reasonable assurance regarding whether MNsure is in compliance with 45 CFR 155 in all material respects. We also selected a sample of eligibility and enrollment transactions and tested for compliance with requirements under 45 CFR 155 for eligibility determination, verification of data, and enrollment with a Qualified Health Plan (QHP).

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METHODOLOGY:

Audit Firm Background:

BerryDunn is a national consulting and certified public accounting firm with multiple practice groups dedicated to serving state and local government agencies. BerryDunn was formed in 1974 and has experienced sustained growth throughout its 51-year history. Today, BerryDunn employs 900+ personnel with headquarters in Portland, Maine—and office locations in Arizona, Connecticut, Hawaii, Massachusetts, New Hampshire, West Virginia, and Puerto Rico. The firm has experienced professionals who provide a full range of services, including information technology (IT) consulting; management consulting; and audit, accounting, and tax services.

Those services include conducting financial and/or programmatic audits of multiple State Based Exchanges. We also have completed audits in accordance with Title 2 U.S. Code of Federal Regulations Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance, previously referred to as OMB Circular A 133) for several sizable healthcare organizations, many of which receive U.S. Department of Health and Human Services federal grants or funding. In addition, we provide audit services for higher education, social service, and economic development organizations, as well as other entities that receive federal grants and are subject to the Uniform Guidance.

Programmatic Audit:

We have examined MNsure's compliance with the programmatic requirements described in 45 CFR 155 for the year ended June 30, 2024, and have issued a report thereon dated May 20, 2025.

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Summary of Programmatic Audit Procedures:

Our audit consisted of specific procedures and objectives to evaluate instances of noncompliance and to test MNsure's compliance with certain subparts of 45 CFR 155. BerryDunn examined compliance with the requirements under 45 CFR 155, in the following programmatic areas:

- General Functions (Subpart C)
- Eligibility Determinations (Subpart D)
- Enrollment Functions (Subpart E)
- Certification of Qualified Health Plans (Subpart K)
- Oversight and Program Integrity Standards (Subpart M)

We reviewed the processes and procedures under 45 CFR 155, in the following programmatic areas in order to determine whether they were in compliance with the requirements of 45 CFR 155:

- Assistors, Navigators, Certified Application Counselors, and Brokers
- Compliance and Program Integrity
- Contact Center
- Eligibility and Enrollment Processes and Procedures
- Privacy and Security
- Qualified Health Plan (QHP) Certification

We reviewed the following documentation, which was obtained directly from MNsure, or located on either the MNsure website or the CMS website:

- Brokers:
 - MNsure Broker Manual
- Contact Center:
 - Contact Center Training
- Contracts and Amendments:
 - Language Line Contract
- Eligibility and Enrollment:
 - MNsure Verifications Manual
 - Eligibility Notice
- General Exchange Policies and Procedures:
 - Authorized Representative Form
 - MNsure Annual Report
 - Outreach Grant
 - Participant Training Guide
- Navigators:
 - Individual Market Policy Manual
 - Navigator Contract
 - Navigator Contract Template
 - Navigators and Certified Application Counselors (CAC) Excel file
 - Navigator In-Person Contract Template
 - Navigator IPA Contract
 - Navigator Tribal Nation Contract
 - Certified Application Counselor (CAC) Contract Template

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- Certified Application Counselor (CAC) Agreement
 - Certified Application Counselor (CAC) Agreement Application
- Organization Chart
- Privacy and Security:
 - Computer Matching Agreement
 - Data Sharing and Business Associate Agreement
 - Data Use Agreement
 - Minimum Acceptable
 - Privacy Impact Assessment (PIA)
 - Record Retention Policy
 - Safeguard Security Report (SSR)
 - System Security Plan (SSP)
 - Third Party Security Assessment
- Terms and Conditions Qualified Health Plan (QHP)
 - Application for Health Coverage

To understand management and staff responsibilities and processes as they relate to compliance with 45 CFR 155, we interviewed the following MNsure staff:

- 1095 and Plan Data Specialist
- Business Operations and Contact Center Director.
- Compliance Coordinator
- Director of Compliance and Program Integrity
- Director of individual market policy, eligibility, and enrollment
- Plan Management and Carrier Relations Director
- Policy Director and Privacy Officer
- Senior Director of Partner Relations
- Senior Internal Auditor

We interviewed the following staff from agencies other than MNsure that are involved in functions related to the exchange:

Minnesota Department of Commerce:

- Actuarial Analyst
- Actuarial Consultant
- Actuary
- Analyst
- Chief Health Actuary
- Health Insurance Supervisor

Minnesota Department of Health:

- Health Care Program Investigator, Senior – Health Policy Division
- Manager. Manage Care Systems – Health Policy Division
- Network Adequacy Analyst – Health Policy Division
- Regulatory Compliance Analyst, Principal – Health Policy Division

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We analyzed the following information to assess MNsure's compliance with the requirements of 45 CFR 155:

- A listing of 1,746,177 eligibility determination transactions completed between July 1, 2023 and June 30, 2024. This population included Medicaid determinations due to the Exchange maintain an integrated eligibility system. We selected 60 cases to test for compliance with eligibility rules, 60 cases to test compliance with enrollment rules, and 60 cases to test for compliance with verification rules.

Confidential Information Omitted

N/A

MINNESOTA AUDIT FINDINGS REPORT

II. PROGRAMMATIC AUDIT FINDINGS

MATERIAL NONCOMPLIANCE

Finding 2024-001

Criteria:

Subpart D – Eligibility, 45 CFR §155.315 requires that a State Based Marketplace (SBM) make a determination based upon the data provided by an applicant in the application, and data received from automated data sources. Under 45 CFR §155.315(f), the Exchange must make a reasonable effort to identify and address any inconsistency between the self-attested data in the application and the information obtained from outside sources by contacting the applicant and requesting him or her to provide additional information to resolve the inconsistency.

Pursuant to 45 CFR §155.315, when the Exchange is unable to verify an applicant's self-attested data related to the applicant's income, Social Security number, citizenship, status as a national, or lawful presence, through applicable outside sources, the Exchange must provide the applicant with a period of 90 days from the date on which the notice regarding the inconsistency is received to provide satisfactory documentary evidence or resolve the inconsistency.

Pursuant to 45 CFR §155.315(f)(3), the Exchange can extend the period if an applicant demonstrates a good-faith effort to provide sufficient documentation to resolve the inconsistency. During this reasonable opportunity period (ROP), an applicant (who is otherwise qualified) is eligible to enroll in a QHP and remains eligible for insurance affordability programs (45 CFR §155.315(f)(4)). If, after the 90-day timeframe (or applicable extensions), the Exchange is unable to resolve the discrepancy between the self-attested information and the outside sources with customer-provided information, then it must re-perform the eligibility calculations and notify the applicant of the new eligibility determination.

Condition and Context:

BerryDunn selected a sample of 60 cases to test MNsure's data verification process. Of the 60 cases tested, twelve cases (20% of 60) did not respond to the verification notice sent by the Exchange within the reasonable opportunity period provided within the notice. Upon expiration of the ROP, the Exchange failed to discontinue or recalculate financial assistance for these applicants. The requirement referenced above stipulates that the Exchange must determine an applicant's eligibility based on the information available from data sources unless such applicant qualifies for an exception upon expiration of the ROP.

Cause:

MNsure did not take action on cases in which the income ROP expired during the audit period, due to staffing constraints and competing priorities.

Effect:

Applicants were conditionally eligible for a longer period than stipulated by state and federal requirements. Applicants could have received an incorrect amount of financial assistance because MNsure did not take action to remove or update financial assistance for applicants who did not provide supporting documentation in a timely manner.

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Finding 2024-002

Criteria:

Verification of Incarceration Status.

Subpart D – Eligibility, 45 CFR §155.315 requires that an SBM make a determination based upon the data provided by an applicant in the application, and data received from automated data sources. Under 45 CFR §155.305(e), the Exchange must verify an applicant's attestation that he or she meets the requirements by relying on electronic data sources that are available to the Exchange.

Condition and Context:

During the audit period, MNsure did not utilize available electronic data sources to verify an applicant's incarceration status. MNsure initially determines eligibility based upon the applicant's self-attested data in his or her application and subsequently verifies that data through a match with the Federal Data Services Hub (FDSH). For one out of 60 cases that were selected for testing, we identified that the self-attested incarceration status was not verified with the federal hub. Additionally, MNsure's policy requires the Exchange to use the federal data hub as an electronic source to check federal incarceration records. MNsure policy also states that if a consumer does not submit their proof of non-incarceration status, they should be determined ineligible for a Qualified Health Plan (QHP), Advanced Premium Tax Credit (APTC), and Cost Sharing Reductions (CSR) which did not occur. During the analysis of this case, it was discovered that the Minnesota Eligibility Technology System (METS) is not requesting incarceration status from the FDSH for applicants that attest to being lawfully present.

Cause:

MNsure confirmed a system defect that caused METS to omit verification of incarceration status for applicants that attest as being lawfully present.

Effect:

In order to be eligible for any plan offered by the exchange, the CFR requires that an applicant not be incarcerated. As the incarceration status was not verified with the FDSH, incarcerated applicants could have been incorrectly determined eligible, if their attested to status on not being incarcerated was incorrect.

MATERIAL WEAKNESS IN INTERNAL CONTROL OVER COMPLIANCE:

We identified certain deficiencies in internal control over compliance, described in Findings 2024-001 and 2024-002, that we consider to be material weaknesses.

SIGNIFICANT DEFICIENCIES IN INTERNAL CONTROL OVER COMPLIANCE:

N/A

MINNESOTA AUDIT FINDINGS REPORT

PROGRAMMATIC AUDITOR'S OPINION:

☒ QUALIFIED

☐ UNQUALIFIED

☐ ADVERSE

☐ DISCLAIMER

ADDITIONAL COMMENTS:

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III. RECOMMENDATIONS

Finding 2024-001

Recommendation:

BerryDunn recommends that MNSure consistently redetermine financial assistance for applicants that do not provide supporting evidence to resolve an income inconsistency within the ROP.

Finding 2024-002

Recommendation:

BerryDunn recommends MNSure continue to work with Minnesota IT Services (MNIT) to ensure all applicants are included in the incarceration verification with the FDSH.

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IV. FINANCIAL STATEMENT AUDITOR'S OPINION

BerryDunn does not perform the financial audit for MNsure.

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V. CONCLUSION

Based on a review of the documentation required for this report, in our opinion, except for the material noncompliance described in the Audit Findings section of this report, MNsure complied with the requirements of 45 CFR § 155, Subparts C, D, E, K, and M during the year ended June 30, 2024, in all material respects.

SIGNATURE OF AUDIT FIRM:

BMP Assurance, LLP

COMPLETION DATE OF AUDIT:

FINDINGS REPORT: MAY 20, 2025

Minnesota State Based Marketplace (MNsure)

PROGRAMMATIC COMPLIANCE REPORT

Year Ended June 30, 2024

With Independent Accountant's Report

berrydunn.com

INDEPENDENT ACCOUNTANT'S REPORT

Board of Directors and Management
MNsure

Report on Compliance

We have examined MNsure's (the Exchange), an enterprise fund of the state of Minnesota, assertion that the Exchange operated in compliance with the requirements in Title 45, Code of Federal Regulations, Part 155 (45 CFR 155), Subparts C, D, E, K, and M during the plan year July 1, 2023 to June 30, 2024. The Exchange's management is responsible for its assertion. Our responsibility is to express an opinion on the Exchange's assertion based on our examination.

Our examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants (AICPA) and the standards applicable to attestation engagements contained in *Government Auditing Standards* issued by the Comptroller General of the United States. Those standards require that we plan and perform the examination to obtain reasonable assurance about whether the Exchange's assertion is fairly stated, in all material respects. An examination involves performing procedures to obtain evidence about the Exchange's assertion. The nature, timing, and extent of the procedures selected depend on our judgment, including an assessment of the risks of material misstatement of the Exchange's assertion, whether due to fraud or error. We believe that the evidence we obtained is sufficient and appropriate to provide a reasonable basis for our opinion.

We are required to be independent and to meet our other ethical responsibilities in accordance with relevant ethical requirements relating to the engagement.

Our examination does not provide a legal determination on the Exchange's compliance with specified requirements.

Our examination disclosed material noncompliance with 45 CFR Part 155, Subparts C, D, E, K, and M applicable to the Exchange during the year ended June 30, 2024, as disclosed in the accompanying schedule of findings as Findings 2024-001 and 2024-002.

In our opinion, except for the material noncompliance described in the accompanying schedule of findings, the Exchange complied with the requirements of 45 CFR 155, Subparts C, D, E, K, and M during the year ended June 30, 2024, in all material respects.

Other Reporting Required by *Government Auditing Standards*

In accordance with *Government Auditing Standards*, we have also issued our report dated May 20, 2025, on our consideration of the Exchange's internal control over compliance with certain provisions of laws, regulations, contracts, and grant agreements. The purpose of that report is solely to describe the scope of our testing of internal control over compliance and the results of that testing, and not to provide an opinion on the effectiveness of the Exchange's internal control over compliance. That report is an integral part of an examination performed in accordance with *Government Auditing Standards* in considering the Exchange's internal control over compliance.

Board of Directors and Management
MNSure

Intended Use

This report is intended to describe the scope of our examination of compliance and the results of the examination based on attestation standards established by the AICPA and *Government Auditing Standards* and it is not suitable for any other purpose.

BDMF Assurance, LLP

Portland, Maine
May 20, 2025

**INDEPENDENT ACCOUNTANT'S REPORT ON INTERNAL CONTROL OVER COMPLIANCE WITH
REQUIREMENTS OF TITLE 45, PART 155, SUBPARTS C, D, E, K, AND M OF THE CODE OF
FEDERAL REGULATIONS**

Board of Directors and Management
MNSure

We have examined, in accordance with attestation standards established by the American Institute of Certified Public Accountants (AICPA) and the standards applicable to attestation engagements contained in *Government Auditing Standards* issued by the Comptroller General of the United States, the assertion that the Exchange operated in compliance with the requirements in Title 45, Code of Federal Regulations, Part 155 (45 CFR 155), Subparts C, D, E, K, and M during the plan year July 1, 2023 to June 30, 2024. We have issued our report on the Exchange's assertion of compliance with the above stated requirements dated May 20, 2025, which contained a qualified opinion due to material noncompliance with the specified requirements.

Management of the Exchange is responsible for establishing and maintaining effective internal control over compliance with the compliance requirements described in 45 CFR 155, Subparts C, D, E, K, and M. In planning and performing our examination of the Exchange's assertion of compliance, we considered the Exchange's internal control over compliance with the requirements described above as a basis for designing examination procedures that are appropriate in the circumstances for the purpose of expressing an opinion on compliance with those requirements, but not for the purpose of expressing an opinion on the effectiveness of internal control over compliance. Accordingly, we do not express an opinion on the effectiveness of the Exchange's internal control over compliance.

A deficiency in internal control over compliance exists when the design or operation of a control over compliance does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, noncompliance with a type of compliance requirement on a timely basis. *A material weakness in internal control over compliance* is a deficiency, or a combination of deficiencies, in internal control over compliance, such that there is a reasonable possibility that material noncompliance with a type of compliance requirement will not be prevented, or detected and corrected, on a timely basis. *A significant deficiency in internal control over compliance* is a deficiency, or a combination of deficiencies, in internal control over compliance with a type of compliance requirement that is less severe than a material weakness in internal control over compliance, yet important enough to merit attention by those charged with governance.

Our consideration of internal control over compliance was for the limited purpose described in the second paragraph and was not designed to identify all deficiencies in internal control over compliance that might be material weaknesses or significant deficiencies. We identified certain deficiencies in internal control over compliance, described in the accompanying schedule of findings as Findings 2024-001 and 2024-002, that we consider to be material weaknesses.

The Exchange's responses to the internal control over compliance findings identified in our examination are described in the accompanying schedule of findings. The Exchange's responses were not subjected to the procedures applied in the examination of compliance and, accordingly, we express no opinion on the responses.

Board of Directors and Management
MNSure

We are required to be independent and to meet our other ethical responsibilities in accordance with relevant ethical requirements relating to the examination engagement.

The purpose of this report on internal control over compliance is solely to describe the scope of our testing of internal control over compliance and the results of that testing based on the requirements of *Government Auditing Standards*. Accordingly, this report is not suitable for any other purpose.

BDMF Assurance, LLP

Portland, Maine
May 20, 2025

**MNSure
Schedule of Findings
Year Ended June 30, 2024**

Finding 2024-001

Criteria:

Subpart D – Eligibility, 45 CFR §155.315 requires that a State Based Marketplace (SBM) make a determination based upon the data provided by an applicant in the application, and data received from automated data sources. Under 45 CFR §155.315(f), the Exchange must make a reasonable effort to identify and address any inconsistency between the self-attested data in the application and the information obtained from outside sources by contacting the applicant and requesting him or her to provide additional information to resolve the inconsistency.

Pursuant to 45 CFR §155.315, when the Exchange is unable to verify an applicant's self-attested data related to the applicant's income, Social Security number, citizenship, status as a national, or lawful presence, through applicable outside sources, the Exchange must provide the applicant with a period of 90 days from the date on which the notice regarding the inconsistency is received to provide satisfactory documentary evidence or resolve the inconsistency.

Pursuant to 45 CFR §155.315(f)(3), the Exchange can extend the period if an applicant demonstrates a good-faith effort to provide sufficient documentation to resolve the inconsistency. During this reasonable opportunity period, an applicant (who is otherwise qualified) is eligible to enroll in a QHP and remains eligible for insurance affordability programs (45 CFR §155.315(f)(4)). If, after the 90-day timeframe (or applicable extensions), the Exchange is unable to resolve the discrepancy between the self-attested information and the outside sources with customer-provided information, then it must re-perform the eligibility calculations and notify the applicant of the new eligibility determination.

Condition and Context:

BerryDunn selected a sample of 60 cases to test MNSure's data verification process. Of the 60 cases tested, twelve cases (20% of 60) did not respond to the verification notice sent by the Exchange within the Reasonable Opportunity Period (ROP) provided within the notice. Upon expiration of the ROP, the Exchange failed to discontinue or recalculate financial assistance for these applicants. The requirement referenced above stipulates that the Exchange must determine an applicant's eligibility based on the information available from data sources unless such applicant qualifies for an exception upon expiration of the ROP.

Cause:

MNSure did not take action on cases in which the income ROP expired during the audit period, due to staffing constraints and competing priorities.

Effect:

Applicants were conditionally eligible for a longer period than stipulated by state and federal requirements. Applicants could have received an incorrect amount of financial assistance because MNSure did not take action to remove or update financial assistance for applicants who did not provide supporting documentation in a timely manner.

**MNsure
Schedule of Findings
Year Ended June 30, 2024**

Recommendation:

BerryDunn recommends that MNsure consistently redetermine financial assistance for applicants that do not provide supporting evidence to resolve an income inconsistency within the ROP.

Exchange Response:

MNsure has procured a new eligibility platform. We expect the issue to be addressed when we have fully migrated to the new eligibility system. A go-live date for the new system is soon to be finalized.

Corrective Action Plan:

We expect the issue to be addressed when we have fully migrated to the new eligibility system. A go-live date for the new system is soon to be finalized.

Responsible Exchange Official:

Chief Operating Officer

Finding 2024-002

Criteria:

Subpart D – Eligibility, 45 CFR §155.315 requires that an SBM make a determination based upon the data provided by an applicant in the application, and data received from automated data sources. Under 45 CFR §155.305(e), the Exchange must verify an applicant’s attestation that he or she meets the requirements by relying on electronic data sources that are available to the Exchange.

Condition and Context:

During the examination period, MNsure did not utilize available electronic data sources to verify an applicant’s incarceration status. MNsure initially determines eligibility based upon the applicant’s self-attested data in his or her application and subsequently verifies that data through a match with the Federal Data Services Hub (FDSH). For one out of 60 cases that were selected for testing, we identified that the self-attested incarceration status was not verified with the federal hub. Additionally, MNsure’s policy requires the Exchange to use the federal data hub as an electronic source to check federal incarceration records. MNsure policy also states that if a consumer does not submit their proof of non-incarceration status, they should be determined ineligible for a Qualified Health Plan (QHP), Advanced Premium Tax Credit (APTC), and Cost Sharing Reductions (CSR) which did not occur. During the analysis of this case, it was discovered that the Minnesota Eligibility Technology System (METS) is not requesting incarceration status from the FDSH for applicants that attest to being lawfully present.

Cause:

MNsure confirmed a system defect that caused METS to omit verification of incarceration status for applicants that attest as being lawfully present.

**MNsure
Schedule of Findings
Year Ended June 30, 2024**

Effect:

In order to be eligible for any plan offered by the Exchange, the CFR requires that an applicant not be incarcerated. As the incarceration status was not verified with the FDSH, incarcerated applicants could have been incorrectly determined eligible, if their attested to status on not being incarcerated was incorrect.

Recommendation:

BerryDunn recommends MNsure continue to work with Minnesota IT Services (MNIT) to ensure all applicants are included in the incarceration verification with the FDSH.

Exchange Response:

MNsure has procured a new eligibility platform. We expect the issue to be addressed when we have fully migrated to the new eligibility system. A go-live date for the new system is soon to be finalized.

Corrective Action Plan:

We expect the issue to be addressed when we have fully migrated to the new eligibility system. A go-live date for the new system is soon to be finalized.

Responsible Exchange Official:

Chief Operating Officer



May 27, 2025

Sangha Park
State Marketplace & Insurance Programs Group
Center for Consumer Information and Insurance Oversight
Centers for Medicare & Medicaid Services

Dear Ms. Park,

Enclosed is the *Independent External Audit: 2024 Audit Findings Report, Minnesota*, which was completed by the auditing firm of BDMP Assurance, LLP ("BerryDunn"). We welcome this annual review and view it as part of MNSure's and the Minnesota Eligibility Technology System's continuous improvement efforts.

MNSure agrees with and supports the observations and findings in this report, and we have continued implementing its recommendations. MNSure's response and corrective action plan for each finding are attached.

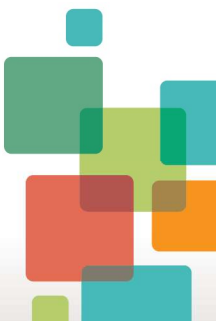
MNSure is committed to increasing the number of Minnesotans who have the security of health insurance. Plan year 2024 had a record 146,445 qualified health plan sign-ups, and we are proud of our role in helping 96.2% of Minnesotans get health insurance coverage.

MNSure helped thousands of Minnesotans transition to new coverage when they were no longer eligible for Medical Assistance or MinnesotaCare. By the end of the Medicaid unwinding, 12,590 Minnesotans signed up for a qualified health plan sold through MNSure, out of a total 39,533 consumers who were newly eligible.

During 2024 we launched Easy Compare plans (standardized plans) for the first time, allowing Minnesotans to have an apples-to-apples comparison to simplify their enrollment process. Nearly 20% of MNSure consumers selected an Easy Compare plan during their 2025 enrollment.

The work to improve MNSure not only includes this organization, but also the dedicated staff at the Minnesota Department of Human Services and Minnesota IT Services. Together, we have a strong, multi-agency project management team and a decision-making process in place. We are grateful for their partnership and look forward to continuing our work together.

We take our responsibility to be an accountable and transparent organization seriously, and we work to proactively identify and make improvements to all areas of the organization, including those documented in various state and federal audit reports completed on MNSure.





We are grateful for BerryDunn's review and consider it an important tool we can use to help guide our improvements. Looking ahead to 2025 and beyond, MNSure will continue to prioritize its mission of promoting informed consumer choice, simplifying health plan comparison, and helping every Minnesotan obtain affordable, quality health insurance. MNSure is committed to reducing the rate of uninsured in Minnesota so that all Minnesotans, regardless of health status, have the security of comprehensive, affordable health insurance.

Sincerely,

A handwritten signature in black ink, appearing to read "Libby Caulum".

Libby Caulum
Chief Executive Officer



Detailed Response to Findings

Finding #2024-001

MNsurance Response: MNsure agrees with this finding. MNsure has procured a new eligibility platform. We expect the issue to be addressed when we have fully migrated to the new eligibility system. A go-live date for the new system is soon to be finalized.

Corrective Action Plan: MNsure expects the issue to be addressed when we have fully migrated to the new eligibility system.

Responsible MNsure Official: Jessica Eguia, Chief Operating Officer

Scheduled Completion Date: A go-live date for the new system is soon to be finalized.

Finding #2024-002

MNsurance Responses: MNsure agrees with this finding. MNsure has procured a new eligibility platform. We expect the issue to be addressed when we have fully migrated to the new eligibility system. A go-live date for the new system is soon to be finalized.

Corrective Action Plan: MNsure expects the issue to be addressed when we have fully migrated to the new eligibility system.

Responsible MNsure Official: Jessica Eguia, Chief Operating Officer

Scheduled Completion Date: A go-live date for the new system is soon to be finalized.