

# **FAQs Regarding Dependent Verification Data Security**

The City has a dependent eligibility verification process in place to ensure that the City's benefit dollars are used appropriately. This process also helps us make sure we are operating our benefit program in accordance with federal tax law and industry practices, using taxpayer and ratepayer dollars wisely, and treating all employees consistently and fairly. That said, we want to continue the coverage of all newly added dependents that meet our eligibility criteria. We are committed to helping you confirm the eligibility of your dependents and to keep them on your benefits.

Our primary considerations in designing the dependent verification process were maintaining data security, and providing outreach and other support services for our employees. This set of FAQs addresses security of your data.

### How do I know Alight Solutions will keep my personal information secure?

Data security was a primary concern when the City selected a firm to provide dependent verification services. The City's Office of Information Security, working with the Benefits Unit of the Seattle Department of Human Resources and the Department of Finance and Administrative Services' Contracting group, performed an exhaustive evaluation of potential vendors. They endorsed Alight Solutions' industry-leading standard for maintaining the privacy and security of individual data. With their internal controls, policies, processes, and experience handling this kind of information, the City has great confidence in Alight Solutions' ability to maintain the safety of City employees' personal data.

Alight Solutions has strict policy guidelines including:

- document access logs,
- secured physical storage facility with multiple lock access requirements,
- secured server facility,
- employee background checks,
- advanced encryption techniques, including encryption of all passwords and strict requirements around password length and complexity,
- employee access on a need-to-know basis only.

Alight Solutions highlights their digital systems and related security as key differentiators from their competitors. City Information Security staff determined that "employee data is safer with Alight Solutions than with many commercial vendors".

# How does Alight Solutions protect our data from malicious infections?

Protection from external harm is just as important as internal safety. Alight Solutions uses an industry grade anti-virus server and software products to perform daily and on-demand monitoring of worms and viruses. Virus definitions are updated daily and all files and emails are re-scanned weekly. Spyware products are used to protect web users from spam and spyware after login.

#### How do I know Alight Solutions won't sell my data?

Alight Solutions will not sell your data to anyone. Under the City's contract and their own Security and Privacy policy, Alight Solutions agrees they will not sell, trade or disclose to third parties any individually identifiable information derived from eligibility verification, except as required by law.

# If there is a breach, how will I be protected?

Even with vigilance and strong controls in place, data breaches are possible. Alight Solutions will, in the event of a security breach which results or could result in the release of personal data, communicate promptly with the City and affected City employees, and provide credit monitoring services for one year.

#### When is dependent verification required?

The City conducted an initial process in 2014, verifying all dependent eligibility for current employees. The verification process is now required of all new hires and all dependents added through Open Enrollment and life events like marriage, a new domestic partnership, or birth, adoption, or legal guardianship of a child.

# Why does the City have an outside organization gather these documents instead of City Human Resources staff?

When we started exploring the dependent verification concept, it became clear that the process could not be performed with the City staff and systems currently in place. The City would have needed to create a more secure data center, a special web interface, and a customer service unit to handle the documents and questions related to over 16,000 dependents. As we analyzed the options further:

- Market research indicated that a number of independent firms have made the
  dependent verification process a key part of their business. Their fees to the City
  are far below the cost of creating the structure internally.
- Review of the experience of other large employers pointed to the common practice of using an outside vendor to manage the process.
- Exploratory conversations with a number of employees and union representatives indicated that many preferred that the City NOT have access to additional personal information. The City will not see your documents unless we are asked to address an appeal of Alight Solutions' decision. In the majority of cases, all we will know is which dependents have been confirmed for future coverage.

As a result, the Seattle Department of Human Resources decided to have dependent verification performed by an outside firm. Our primary selection criteria were the ability to maintain data security, and the ability to provide outreach and other support services for our employees. The City wants to ensure that all dependents eligible for our benefit programs can stay on them and that employees will have the support they need to secure and submit the necessary documents to do so. In this competitive bid process, Alight Solutions was the clear leader in both of these areas.

For additional information, see Alight Solutions' Security and Privacy Policy.

Updated June 2, 2020