

Early Warning System

Frequently Asked Questions

Version 1.1

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Document Revision History

Version #	Date	Change Description
1.0	March 30, 2010	Original document
1.1	May 17, 2010	Added section 8 - EWS User Role Descriptions and table on the document revision history



1. Introduction

Q: What is the Early Warning System (EWS)?

A: EWS is a new system that will be analyzing submitted automobile data in an automated fashion. EWS will leverage anomaly rules derived from the existing set of automobile profiles that IBC currently reviews manually, but in an automated fashion. Insurance company representatives will be apprised of data anomalies automatically by this system and will work in concert with their assigned IBC analysts in order to resolve the issues.

Q: What is the purpose of the EWS?

A: The purpose of the EWS is to enhance the overall data quality and accuracy and improve the source data used for many industry products and initiatives. EWS will allow IBC to review higher volume of submitted information at an aggregate level, identify questionable or suspect data sooner and allow companies to address the issues in timely manner.

Q: Who will use the EWS?

A: The primary users for the new system will be the company data accuracy contacts and IBC data quality analysts.

Q: Do companies have to sign up for EWS?

A: Yes, it is mandatory for all companies that report Automobile data to IBC to have users setup with access on EWS.

Q: Where can I get the EWS user id request form and where should it be sent?

A: EWS user id forms are available on IBC website Data Processing site at the following URL: http://www.ibc.ca/en/DQ_Management

Completed forms should be sent back to IBC as per instruction on the form.



Q: What statistical plans does the EWS analysis include?

A: In the current release the EWS will be analyzing Automobile data (Plans 8 and 9). Commercial Liability (Plan 4) and Ontario Statutory Accident Benefits (Plan7) are not currently included in the EWS scope.

Q: Is there a test period for the EWS?

A: No, once the system is implemented the analysis will be ongoing against real production data and any issues identified have to be addressed by the companies.



2. User Roles

Q: What user roles are there for the EWS and what are their responsibilities?

A: There are 4 different user roles for EWS on the insurer side. They include:

- **EWS - Company Issue Contact** (one per reporting company).
Designated Company Issue Contact is responsible for handling data issues identified through the Early Warning System.
- **EWS - Additional Company Issue User** (maximum five per reporting company).
Additional user is an optional role for companies with access similar to the Company Issue Contact. The only difference between the two roles is that Additional Company Issue User does not receive direct communication or notification status reports from EWS. The role will have access to review and update the issues raised by the Early Warning System.
- **EWS - Company Issue Manager** (one per reporting company).
Designated Company Issue Manager is responsible for handling data issues that have not been receiving adequate response based on the predefined time thresholds and have been escalated through the Early Warning System.
- **EWS - Company Issue Director** (one per reporting company).
Designated Company Issue Director is responsible for handling data issues that have not been receiving adequate response based on the predefined time thresholds and have been escalated through the Early Warning System. Note that this is the last level of escalation before the issue gets escalated to GISA.

Q: For weekly notification can we provide a group email so several stakeholders at the company find out about the status of the issues?

A: Yes, a company can provide a group email for the EWS Coordinator and it would allow the weekly notification to be shared between multiple stakeholders at the company. However, note that the person named as the Issue Coordinator will be the primary contact for EWS related communication.



3. Issue Rules

Q: What are the EWS rules that lead to issues?

A: All the identified EWS anomalies can lead to issues. The Data Quality Analysts are the first level of analysis and investigation. If their analysis determined that the data is not reported according to expectations then the anomaly becomes an issue and requires company's involvement.

Q: How were the EWS rules created?

A: EWS rules were created based on analysis of company and industry data and referencing past and current reporting and business patterns.

Q: Do EWS rules change?

A: There will be periodic reviews of all rules to see that they are reflective of the industry business patterns and when necessary existing rules will be adjusted.

Q: Where can I find more information on the issue rules?

A: All issues identified for a company on the EWS application will include the issue rule business description. For full list of EWS rule descriptions refer to the EWS Anomaly Rule Business Descriptions document available at IBC Data Quality Website (link provided in Section 8- Information, Support and Contact Details).

Q: What if a rule is not applicable to a company business practice?

A: If an issue is identified where a company is reporting data in different patterns from the industry then the company should notify IBC analyst and provide sufficient background information to verify the nonstandard activity. Such exceptions will be managed in the EWS to ensure that issue is not raised again for subsequent data. Note that all exceptions will be regularly reviewed and company may be required to reconfirm the status.



4. Issue Identification

Q: How does EWS identify issues?

A: EWS rules are triggered against the company data on an automated schedule or on per request basis. Once a completed data set, i.e. full month, quarter or complete annual year of data has been received and processed through the front end consistency and validity edits, the EWS system automatically runs the rules on the aggregated data set. Comparisons are made against historic data sets as well as against expected business conditions. Any non conforming data groups are identified as anomalies for IBC analyst review.

Q: What is the role of the IBC analyst in the EWS?

A: IBC analyst reviews all anomalies and reviews the source data in an attempt to further identify the affected data. When the data irregularity is confirmed then IBC analyst confirms the anomaly as an issue on EWS requiring company follow-up. However, if the irregularity can be explained by a minor variance in the reported data then the anomaly is closed by the analyst.

Q: How does company find out about the issues?

A: There is a weekly email notification including status on all new and open issues which requires the company's attention. Weekly email is sent to the Company Issue Coordinator, and all issues and their status information are available on the EWS application online and can be accessed at any time.

Q: When are the weekly email notification sent out?

A: Weekly email notification is sent out weekly on Friday.

Q Can the weekly notification be sent to multiple recipients or to a group email?

A: Weekly email is sent to the Company Issue Coordinator only. However, any company can choose to give a group email address for Company Issue



Coordinator role and this would ensure that all stakeholders at the company will be receiving the email.

Q: If there are no new issues identified during the week, does an email notification still populate advising that there are no issues or provide a status on the historic item?

A: If there are no new issues generated, there is no automatic communication, but the company can generate their own report to review the status of all the issues by using the Issue Management Reports.

Q: How do the issues get closed?

A: After the company has investigated the identified issue and either provided a business reason or corrected the data through either a resubmission or a historical data correction, the issue can be closed. Note that if the company resubmits the data the EWS system will automatically rerun the rules process and if the issue is no longer present the issue will be closed.

Q: Are error transaction included in the analysis?

A: Yes, the EWS system allows for using both error free and error data in the analysis.

Q: Can error transactions cause an anomaly?

A: Yes, if a company is submitting high volume of error transactions that passed the acceptable threshold, it can lead to anomalies and subsequently issues. Once the errors are corrected a company can request for a rerun of the EWS. If the data is resubmitted without errors the EWS system will automatically rerun the rules to confirm whether an issue continues in the new data set or whether it was resolved. If the issue was resolved with the resubmission then EWS will automatically close the issue.



Q: What happens if a problem with a key field in data causes multiple issues?

A: EWS includes a number of dependencies to mitigate generation of multiple issues resulting from an error in a key field.

Q: What happens if the same problem persists over multiple reporting periods?

A: If the same issue continues over multiple reporting periods the anomaly will still be generated for the company and identified as a related issue. The new anomaly can be turned into an issue or the comments on the original issue expanded to identify that multiple time periods are impacted. Please consult with your IBC Analyst regarding resolution of these issues.

Q: What happens with late data submissions or resubmissions?

A: Late data submissions or resubmissions will trigger the rerun of the all the EWS rules on the newly received data set. The regular issue resolution process will be in effect. Note that late data submissions resubmissions after due dates are subject to the deficiency penalty fees.



5. Issue Correction Process

Q: How to correct data issues?

A: Once an issue is identified and acknowledged by the company the correction can be made by resubmission of the source data. Depending on the incorrect data set composition, resubmission can be made at a complete file/ batch level, at provincial level or even at specific transaction set level. Note that reversal or offset transaction set would need to be created and processed to remove the original invalid data from the system.

Q: Do we need to resubmit all the data to resolve an issue?

A: Depending on the specific problem, replacement data can be submitted for the complete file / batch, only for the impacted jurisdiction, or for group of transactions that were causing the issue.

Q: Is company penalized for resubmission of data?

A: Refer to Section 7 – Penalties.

Q: What if additional time is required to resolve an issue?

A: All companies should do their utmost to investigate and address the identified issues in timely manner. If additional time is required for implementation of a solution the company should communicate their action plan to the IBC analyst. Such information will be reviewed and any changes in the issue resolution time frame must be approved by IBC Data Processing Management.

Q: What happens if the issue identified cannot be resolved?

A: IBC expectation is that all issues identified are resolvable in company data reporting. In the rare circumstances where an item cannot be addressed the issue and its impact on the industry data reporting will be evaluated, and may be noted to the regulator for their review.



Q: Will the historical data correction service continue to be available?

A: Yes, the historical data correction service will remain available for addressing identified issues on the data reporting. Note that fees related to the historical data correction will be charged if such requests are made.

Q: How long does it take to do a historical data correction?

A: Each request for historical data correction will be assessed on the complexity and effort and timelines communicated back to the company.

Q: What happens to the old issues which were identified through manual profiling prior to EWS?

A: Issues predating the EWS system identified through data accuracy profiling must still be addressed and resolved by the company. Some of the issues from 2009 and prior data may be recreated in the EWS system.

Q: When the EWS system goes live will all the business rules be applicable?

A: EWS rules will be phased in during the April to June 2010 period.

Q: Will the same data be reprocessed once new rules are introduced?

A: No, new rules will be phased in and any data that has been processed previously will not be reprocessed.

Q: What data is included in the analysis once EWS is implemented?

A: EWS data analysis starts with the January 2010 entry date data.

Q: What if a company data is not matching the industry standards due to special business circumstances?

A: Once a company data set has been identified as not meeting an industry standard rule then the company would be required to provide the necessary



background details to get an exemption from that rule. Note that all exemptions rules will be regularly reviewed for continued applicability.

Q: Under the batch tab, is there a link to the province that tells us how many records have the problem?

A: No, the only record count available is for the total province, NOT for the individual or combined batches.

Q: In the email function can the To: or cc: function be opened up to add email addresses or can the cc: function automatically populate the user's email address when sending an email to the DQA?

A: IBC is looking into the possibility of enhancing this functionality, but the initial implementation will include only one email to the IBC's DQA.

Q: On the Status history screen, when companies hit the button to send the DQA an e-mail or the button to reverse a batch, is it possible to be automatically cc'd on the e-mail request?

A: IBC is looking into the possibility of enhancing this functionality, but the initial implementation will include only one email to the IBC's DQA.

Q: In the e-mail header is it possible to get additional information besides the four digit issue ID? (Information such as company number, anomaly ID and if possible a short anomaly description.)

A: IBC will look into this request and will advise if this will be amended in the future.



6. Escalation Process

Q: What are the reasons for an issue to be escalated?

A: The escalation process starts if there is no action on the identified issues, within the timelines provided for resolution. Escalation will be through E-mail notification sent to the company issue manager and / or director.

Q: What are the time periods for escalation?

A: Issues are escalated if there is no action or status updates within 30 days after the initial issue posting or from last update provided.

Q: If you use the status already can you use it again after the 30 day expired (i.e. company investigation)?

A: The same Status can be used to add comments; however, escalation process is based on the original Status date.

Q: What is the escalation process?

A: Initial escalation is to the company issue manager after 30 days of inaction. Subsequent escalation will be to the company issue director. A similar process exists within IBC. Note that escalations may also be noted to the regulators if more than 90 days went by without any action provided by the company.

Q: How does the escalation take place?

A: Escalation notice will be sent via e-mail to the company issue manager and / or director.

Q: Will there be communication going to the Issue Director?

A: Yes, there will be communication to the Issue Director. IBC will put together documentation with the expected action to be taken by each EWS assigned role.



Q: Is it possible to extend the time period to avoid escalation?

A: No, the expectation is that a company investigates and provides required information on the identified issue within 30 days of the initial notification. If additional time is required either for investigation or for the implementation of the fix then communication with an explanation has to be sent to the IBC analyst. Such requests will be reviewed and any changes in the escalation period must be approved by IBC Data Processing Management.



7. Penalties and Fees

Q: Are there penalties / deficiency fees for Early Warning System?

A: Currently there are no penalties for the EWS identified issues. However, if an issue leads to resubmission of data then regular deficiency fees for late submission are applicable. For further information on late fees refer to Deficiency Fee Reference Manual available at IBC Data Quality website.

Q: Will there be penalties or / deficiency fees in the future?

A: Statistical data deficiency fees are currently under review. Any rule or deficiency fees changes will be communicated to the companies with ample notice.

Q: Is it possible to have the scope of the new DFS fees distributed by the end of 2010 in order to advise the companies in time for their budgeting purposes for 2011?

A: As soon as the new DFS fees have been finalized and approved, IBC will share this information with the industry. At this point in time we don't have an estimated time when this will occur.

Q: What are the fees if a company requests historical data correction from IBC?

A: Historical data correction fees are assessed individually as per each requests depending on the complexity, effort and time required to resolve the issue.



8. Early Warning System – Insurer User Role Descriptions

The following section provides a summary overview of responsibilities for the 4 different roles that insurance company contacts may have on the Early Warning System.

Company Issue Contact:

- 1 user required per company
- Mandatory role

Role Description:	Role Responsibilities	Comments
<ul style="list-style-type: none"> • Primary Contact for IBC on issues related to EWS • Recipient of the Weekly Issue List which contains all new data issues that have been detected, as well as any existing data issues that are awaiting a company response. 	<ul style="list-style-type: none"> • Responsible for handling data issues identified through the EWS on the company side • Accountable for updating the EWS issue status information. 	<ul style="list-style-type: none"> • Company issue contact can be the person investigating and resolving the issues. • For larger companies they can be the main contact person who receives, reviews and monitors the Weekly Issue List, assigns specific issues to others within the organization and coordinates resolution. • Importantly, even if others within organization are looking after the issue, it is the Company Issue Contact who has the final responsibility for updating and resolving issues on a timely basis.



Company Issue Manager:

- 1 user required per company
- Mandatory role. Note that Company Issue Manager should not be the same person as the Company Issue Contact or Company Issue Director.

Role Description:	Role Responsibilities	Comments
<ul style="list-style-type: none"> • First Level Escalation Contact for EWS issues for IBC. • Recipient of the 1st level Escalation email identifying the issue ID causing escalation. Additional issue details are available on the EWS system. • First Level Escalation occurs after issue status remains unchanged for <u>30 days</u>. Note that the issue can have different types of status such as Issue, Insurer Investigating, Issue to be fixed, etc. 	<ul style="list-style-type: none"> • Responsible for handling data issues that have not been receiving adequate attention or response based on the predefined time thresholds and have been escalated through the Early Warning System. • Must ensure that the identified issue receives immediate attention and status information on the EWS gets updated accordingly. 	<ul style="list-style-type: none"> • Company Issue Manager has full access to the EWS system and its management reports and can review the status and progress of issue resolution at any time. <p><u>IMPORTANT:</u></p> <ul style="list-style-type: none"> • <u>If there is no action on the identified item the next level escalation is to the Company Issue Director.</u>



Company Issue Director:

- 1 user required per company
- Mandatory role. Note that Company Issue Director should not be the same person as the Company Issue Contact or Company Issue Manager.

Role Description:	Role Responsibilities	Comments
<ul style="list-style-type: none"> • Second Level Escalation Contact for EWS issues for IBC. • Recipient of the 2nd level Escalation email identifying the issue ID causing escalation. Additional issue details are available on the EWS system. • Second Level Escalation occurs after issue status remains unchanged for <u>60 days</u>. Note that the issue can have different types of status such as Issue, Insurer Investigating, etc. • Contact point for issues escalated to the GISA. 	<ul style="list-style-type: none"> • Responsible for handling data issues that have not been receiving adequate attention or response based on the predefined time thresholds and have been escalated through the Early Warning System. • Must ensure that the identified issue receives immediate attention and status information on the EWS gets updated accordingly to avoid escalation to GISA. • Accountable for adequate internal resources being available and processes in place to address issues identified through EWS within allowed timelines. 	<ul style="list-style-type: none"> • Company Issue Director has full access to the EWS system and its management reports and can review the status and progress of the issue resolution at any time. <p><u>IMPORTANT:</u></p> <ul style="list-style-type: none"> ○ <u>If there is no action on the identified item the next level escalation is to GISA.</u>



Company Additional User:

- 0-5 users
- Optional role

Role Description:	Role Responsibilities	Comments
<ul style="list-style-type: none">• Company Additional User is an optional user role for companies with access similar to the Company Issue Contact.	<ul style="list-style-type: none">• Support role in resolving identified EWS issues.• Has full access to review and update the issues raised by the Early Warning System. Assignment of responsibility for individual issues is done by the Company Issue Contact.	<ul style="list-style-type: none">• This is a company internal role and the Company Additional User(s) does not receive direct communication or notification status reports from EWS.



9. Information, Support and Contact Details

Q: Where can we find more information on the EWS system?

A: More information on the EWS system is available on the IBC Data Processing site at the following web link:

http://www.ibc.ca/en/DQ_Management/Early_Warning_System/index.asp

Q: Who do we contact about EWS business related questions or if we have suggested enhancements?

A: All communication regarding EWS issues should be with the companies' designated Data Quality Analyst at IBC.

Q: What if the EWS application is not working properly?

A: For any technical issues, either difficulties with logon, application being unavailable, or slow performance please contact IBC Helpdesk at helpdesk@ibc.ca with a copy to your Data Quality Analyst.