

**Equifax Workforce Solutions
Additional Questions for the Record
Re: the Subcommittee on Health
Committee on Energy & Commerce
U.S. House of Representatives
PPACA Pulse Check: Part 2**

The Honorable Gus Bilirakis

- 1. You have data on about one third of the working population. How do you handle verification for people that you do not have data on? Are we to trust what they say?**

Equifax Workforce Solutions Work Number data is one of several sources of information used by CMS to determine applicant eligibility. Under the Equifax Workforce Solutions contract with CMS, the data hub will send us the applicant's name, date of birth and social security number, which CMS has already verified through other sources. Equifax Workforce Solutions will return the required data elements to CMS if the applicant's information matches a record in The Work Number database. Equifax Workforce Solutions will return a "no match" code to CMS if there is not a matching record in The Work Number database.

- 2. In your testimony, you talk about the confidence in the data in your results. Will you talk more about how you determine confidence in the results? What makes you confident the data on a person is valid? What would give you pause?**

Equifax Workforce Solutions' core business is verifying employment and payroll information. Employers who participate in The Work Number database provide their regular payroll information directly to us in an electronic feed, which becomes the foundation for our verification services. Equifax Workforce Solutions works with employers to assist in the secure transfer of the data including an initial and then an ongoing process to verify the data quality. As our testimony stated, employees can access their Employment Data Report that includes a record of all verifications completed for that employee and the information that was shared. We have processes in place to investigate any disputes and to work with our employer clients to correct any data errors.

- 3. Has HHS, CMS, or another government agency come back to you and asked you to modify the initial contract? If so, what was changed? Did CMS state why they needed to make this change or why this was not included in the original bid?**

CMS has modified the contract to reflect updated CMS Information Security requirements, a new Contracting Officer and her contact information, and a modification that includes a Technical Direction Clause that was not previously provided for in the

contract. These modifications requested by CMS do not change the intent or the ongoing work being performed by Equifax Workforce Solutions. These changes were originated by CMS to reflect the most current regulations and points-of-contact because these items have changed since the award.

4. What security standards do you use? Do you use FISMA standards for your private contracts? How would FISMA standards compare to the equivalent commercial security standards? Would you describe it as a higher or lower standard?

As stated in our testimony, Equifax Workforce Solutions is certified to ISO 27001, a global security standard, and also has a FISMA certification. Both FISMA and ISO 27001 require organizations to establish a formal security program, perform risk analysis, and implement administrative, technical and physical security controls that address those risks. FISMA is a federal law, applicable to executive branch agencies and their contractors, and supported by a standard for selecting and applying security controls. The standard is found in NIST SP 800-53. ISO 27001 is a global commercial standard that is also supported by requirements for selecting and applying security controls. We do not use FISMA in private contracts, but our approach to security through ISO 27001 is comparable to the standard that federal agencies maintain under FISMA.