CIRCULAR LETTER

TO : ALL LIFE INSURANCE COMPANIES DOING BUSINESS IN THE PHILIPPINES

SUBJECT : APPROVAL OF MEDICAL INFORMATION DATABASE ("MID") USER GUIDEBOOK

WHEREAS, pursuant to IC Circular Letter ("CL") No. 2016-54 dated 9 September 2016, a Medical Information Database ("MID") was created and institutionalized in order to detect and deter fraud that may occur in the course of obtaining life, health, disability income, critical illness, and long-term care insurance;

WHEREAS, the MID provides a cost-effective way for insurance companies to determine if medical statements on applications are accurate and complete, which ultimately redounds to the benefit of the insuring public;

WHEREAS, Section 7 of CL No. 2016-54 provides that:

"7. **PLIA as Administrator.** – The Philippine Life Insurance Association, Inc. ("PLIA") shall serve as Administrator of the MID, and shall issue guidelines within thirty (30) days from the date of the effectivity of this Circular to ensure the MID’s compliance with the Data Privacy Act of 2012. The PLIA shall likewise ensure that appropriate information security and data privacy standards are put in place in the use of the MID to guarantee the protection of the ‘sensitive personal information’ and/or privileged information of the applicants and/or policyholders. The guidelines shall be subject to approval by the Insurance Commissioner."

WHEREAS, in compliance with said provision of CL No. 2016-54, the Philippine Life Insurance Association, Inc. ("PLIA") submitted the attached MID User Guidebook for this Commission’s approval;
WHEREAS, after a careful study of the MID User Guidebook, this Commission finds that the same indeed ensures "that appropriate information security and data privacy standards are put in place in the use of the MID to guarantee the protection of the 'sensitive personal information' and/or privileged information of the applicants and/or policyholders;"

NOW, THEREFORE, pursuant to the power of the Insurance Commissioner under Section 437 of Republic Act No. 10607, otherwise known as the Amended Insurance Code of the Philippines, to "issue x x x circulars x x x as may be deemed necessary to secure the enforcement of the provisions of this Code, to ensure the efficient regulation of the insurance industry in accordance with global best practices and to protect the insuring public," the following matters are hereby adopted and promulgated:

1. Approval of MID User Guidebook. – The attached MID User Guidebook is hereby approved for PLIA's implementation and observance.

2. Construction of Approval. – The approval of the MID User Guidebook shall not be construed as depriving the National Privacy Commission (NPC) of its authority and jurisdiction to determine the MID's actual compliance with the provisions of Republic Act No. 10173, otherwise known as the Data Privacy Act of 2012. In any case, this Commission affirms that the NPC is the appropriate government agency tasked to enforce the provisions of said law.

If any provision or part of this Circular is held invalid or unconstitutional, the remainder of the same or the provision/s not otherwise affected shall remain valid and subsisting.

This Circular Letter shall take effect immediately.

DENNIS B. FUNA
Insurance Commissioner
# TABLE OF CONTENTS

<table>
<thead>
<tr>
<th>Introduction</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Legal Basis</td>
<td>3</td>
</tr>
<tr>
<td>2. Initial Implementation Requirements</td>
<td>3</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>I  Member Data &amp; Company Codes</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Current Member Companies</td>
<td>6</td>
</tr>
<tr>
<td>2. Former Member Companies</td>
<td>7</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>II MID Guidelines</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Membership Rules</td>
<td>8</td>
</tr>
<tr>
<td>2. General Rules</td>
<td>9</td>
</tr>
<tr>
<td>3. Responsibilities of the Parties</td>
<td>17</td>
</tr>
</tbody>
</table>

| III MID System Network Design | 19 |

| IV MID System Security Features | 21 |

| V Risk-Based Information Security Process | 24 |

<table>
<thead>
<tr>
<th>VI MID System Guide</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Creating Administrator Accounts</td>
<td>25</td>
</tr>
<tr>
<td>2. Creating User Accounts</td>
<td>25</td>
</tr>
<tr>
<td>3. Creating Records</td>
<td>28</td>
</tr>
<tr>
<td>4. Inquiry/Editing</td>
<td>29</td>
</tr>
<tr>
<td>5. Share Request Approval</td>
<td>42</td>
</tr>
<tr>
<td>6. Other Functions</td>
<td>43</td>
</tr>
</tbody>
</table>
1. Legal Basis


2. Initial Implementation Requirements by CL No. 2016-54

1. Disclosure to Applicants or Policyholders

"2. Disclosure to Applicants or Policyholders. - All insurance companies are required to include the following disclosure statement in its application form for life insurance within one (1) year from the date of the effectivity of this Circular Letter, to wit: "

"DISCLOSURE: In accordance with the Insurance Commission’s Circular Letter No. 2016-54 your medical information will be uploaded to a Medical Information Database accessible to life insurance companies for the purpose of enhancing risk assessment and preventing fraud.

Once uploaded, all life insurance companies will only have limited access to your information in order to protect your right to privacy in accordance with law.

A copy of Circular Letter 2016-54 may be accessed at the Insurance Commission’s website at www.insurance.gov.ph"

2. Disclosure to Existing Policyholders with Records to be Uploaded to the MID

"8. Existing Data. - Existing data collected by the MIB as of the date of effectivity of this Circular shall be uploaded to the MID. Life insurance companies that have access to said existing data are authorized to continue processing the same without need of obtaining consent from the concerned data subjects; Provided, that, upon processing, said companies shall send the following disclosure statement to the last known address of the concerned data subjects, to wit.

"DISCLOSURE: Prior to the passage of data privacy legislation in the Philippines, particularly Republic Act No. 10173, otherwise known as the "Data Privacy Act of 2012", life insurance companies have already shared medical information, including yours, among themselves through an existing Medical Information Bureau (MIB) administered by the Philippine Life Insurance Association (PLIA). The sharing of medical information was done in order to enhance risk assessment and prevent fraud."
In accordance with the Insurance Commission’s Circular Letter No. 2016-54, your medical information previously collected by the MIB will be uploaded to a Medical Information Database (MID) accessible to life insurance companies. Once uploaded, all life insurance companies shall have limited access to your information in order to protect your right to privacy in accordance with law.

A copy of Circular Letter No. 2016-54 may be accessed at the insurance Commission’s website at www.insurance.gov.ph

2.1. Member companies shall be individually responsible for complying with the required disclosure in #1 within the one year period prescribed.

2.2. For compliance to the required disclosure in #2, however, all member companies using the MID must have completed their respective disclosure communications to policyholders in their company’s existing MIB records by not later than June 15, 2017. This will ensure that by the time the MID System is rolled out on the targeted date of July 1, 2017 all policyholders concerned would have already received their notices.
1. Current Member Companies

<table>
<thead>
<tr>
<th>Company Name</th>
<th>Company Code</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sun Life Financial</td>
<td>A</td>
</tr>
<tr>
<td>The Insular Life Assurance Company, Ltd</td>
<td>B</td>
</tr>
<tr>
<td>Ayala Life Assurance, Inc.</td>
<td>D</td>
</tr>
<tr>
<td>Pioneer Life Inc.</td>
<td>E</td>
</tr>
<tr>
<td>Manulife Philippines</td>
<td>F</td>
</tr>
<tr>
<td>Manila Bankers Life Insurance Corporation</td>
<td>G</td>
</tr>
<tr>
<td>First Guarantee Life Assurance Company, Inc.</td>
<td>K</td>
</tr>
<tr>
<td>Philippine American Life &amp; Gen. Insurance Co., Inc.</td>
<td>L</td>
</tr>
<tr>
<td>Sun Life Grepa (formerly Great Pacific Life Assurance Corporation)</td>
<td>M</td>
</tr>
<tr>
<td>Philippines International Life Insurance Company, Inc.</td>
<td>N</td>
</tr>
<tr>
<td>Country Bankers Life Insurance Corporation</td>
<td>P</td>
</tr>
<tr>
<td>United Coconut Planters Life Assurance Corporation</td>
<td>S</td>
</tr>
<tr>
<td>Phil. Life Financial Assurance Corp. (formerly Asian Life Financial Assurance Corporation)</td>
<td>T</td>
</tr>
<tr>
<td>Beneficial Life (formerly Beneficial PNB Life Insurance Company, Inc.)</td>
<td>V</td>
</tr>
<tr>
<td>Asian Life and General Assurance Corp. (formerly ATR Prof. Life Assurance Corporation)</td>
<td>W</td>
</tr>
<tr>
<td>Fortune Life Insurance Company</td>
<td>X</td>
</tr>
<tr>
<td>Philippine AXA Life Assurance</td>
<td>Y</td>
</tr>
<tr>
<td>Philippine Prudential Life Insurance Company</td>
<td>Z</td>
</tr>
<tr>
<td>CAP Life Insurance Corporation</td>
<td>AB</td>
</tr>
<tr>
<td>Philam Equitable Life Assurance Company (formerly Equitable PCI Life Insurance Corporation)</td>
<td>AC</td>
</tr>
<tr>
<td>Pru Life Insurance Corporation of U.K.</td>
<td>AD</td>
</tr>
<tr>
<td>Paramount Life &amp; General Insurance Corporation (formerly Aegon Life Insurance)</td>
<td>AI</td>
</tr>
<tr>
<td>BDO Life Assurance Company Inc.</td>
<td>AO</td>
</tr>
<tr>
<td>Allianz PNB Life Insurance Inc.</td>
<td>AQ</td>
</tr>
<tr>
<td>Cooperative Insurance System of the Philippines</td>
<td>AR</td>
</tr>
<tr>
<td>Company Name</td>
<td>Company Code</td>
</tr>
<tr>
<td>----------------------------------------------------------------------------</td>
<td>--------------</td>
</tr>
<tr>
<td>CLIMBS Life &amp; General Insurance Cooperative (formerly COOP Life Insurance and Mutual Benefit Services; COOP Life Assurance Society of the Philippines)</td>
<td>AS</td>
</tr>
<tr>
<td>Caritas Life Insurance Corp.</td>
<td>AT</td>
</tr>
<tr>
<td>FWD Life Insurance Corp.</td>
<td>AU</td>
</tr>
<tr>
<td>East West Ageas Life Insurance Corp.</td>
<td>AV</td>
</tr>
<tr>
<td>Generali Life Assurance Philippines Inc.</td>
<td>AW</td>
</tr>
<tr>
<td>Philippine Life Insurance Association, Inc.</td>
<td>PLIA</td>
</tr>
</tbody>
</table>

2. Former Member Companies

<table>
<thead>
<tr>
<th>Company Name</th>
<th>Company Code</th>
</tr>
</thead>
<tbody>
<tr>
<td>Aetna Life (acquired by PRU Life)</td>
<td>AA</td>
</tr>
<tr>
<td>Allstate Life Insurance Co. (acquired by PRU Life)</td>
<td>AL</td>
</tr>
<tr>
<td>CMG Life Insurance Co., Inc. (acquired by Manulife)</td>
<td>R</td>
</tr>
<tr>
<td>ING Life Ins. Co. (Phil.), Inc. (acquired by PRU Life)</td>
<td>AE</td>
</tr>
<tr>
<td>John Hancock Life Ins. Corp. (acquired by Manulife)</td>
<td>AJ</td>
</tr>
<tr>
<td>Mapfre Asia (acquired by PNB Life)</td>
<td>J</td>
</tr>
<tr>
<td>MetLife Insurance Co. (Phil.), Inc. (acquired by Manulife)</td>
<td>AP</td>
</tr>
<tr>
<td>Travellers Life Assurance Phil. (acquired by Manulife)</td>
<td>U</td>
</tr>
<tr>
<td>Zurich Life Insurance Phil., Inc. (acquired by Manulife)</td>
<td>AG</td>
</tr>
<tr>
<td>Value Life Financial (formerly Urbancorp Life &amp; Gen. Ins., Inc.)</td>
<td>AK</td>
</tr>
<tr>
<td>Nippon Life Insurance Company of the Phils., Inc. (acquired by SunLife Grepa)</td>
<td>AF</td>
</tr>
<tr>
<td>Berkley International Life Insurance Company, Inc. (acquired by Phil Prudential)</td>
<td>AH</td>
</tr>
<tr>
<td>National Life Insurance Company of the Philippines</td>
<td>H</td>
</tr>
<tr>
<td>Sony Life Insurance (Philippines), Inc. (acquired by Paramount Insurance)</td>
<td>AM</td>
</tr>
<tr>
<td>The Pramerica Life Insurance Company Inc. (acquired by Manulife)</td>
<td>AN</td>
</tr>
<tr>
<td>BF Life Insurance Corporation</td>
<td>C</td>
</tr>
</tbody>
</table>
II. MID GUIDELINES

[A] MEMBERSHIP

1. Any member company of the Philippine Life Insurance Association, Inc. (PLIA) is eligible for membership as a Medical Information Database (MID) user. This membership can be secured by written application by the member-company to the PLIA Board of Directors, which shall be the approving authority for such access.

2. Upon acceptance of its membership, the member company shall execute the standard Memorandum of Agreement (MOA) between PLIA, as the MID Administrator, and the MID member company.

3. The MID Administrator shall provide the MID Web Application & Access credentials and MID User Guidebook for the member company’s users.

4. Member companies shall be responsible for drawing up their rules and procedures for the administration and control of, and access to, the MID records in their respective companies. Such rules and procedures, however, shall not contravene the provisions under the MOA.

5. Member companies shall share in the system and network maintenance cost of the MID as agreed by the PLIA Board of Directors and approved by the General Membership.

6. A member company that fails to comply with the rules and procedures on the use of the MID shall be subject to disciplinary action as may be recommended by the PLIA MID Committee to the PLIA Board of Directors.

7. In case of termination of its membership as MID user or with PLIA, the member company shall do the following:

   7.1. Notify the PLIA Board in writing of the termination of membership

   7.2. Surrender to the MID Administrator the MID User Guidebook under its accountability

   7.3. Deactivate access to the MID by all users within the company.

Thereafter, the MID Administrator shall deactivate access of the member company to the MID.

[B] GENERAL RULES
1. Confidentiality

The member company shall keep all information received from the MID strictly confidential and well-secured. They shall not, in any manner, disclose MID records and the meaning of the impairment codes to any unauthorized person or entity.

2. Access to MID records and Guidebook

2.1. The member company shall limit access to the MID Web Application, its records and the Guidebook only to personnel involved in underwriting and claims processes or executive officers at its discretion.

2.2. The member company shall ensure that no unauthorized personnel, especially members of the sales force, shall have access to the MID Web Application, its records and the Guidebook.

3. Use of Information

3.1. The member company shall limit the use of MID information to processes involving underwriting (whether new business or policy admin) and claims administration.

3.2. No company shall decline, postpone or rate an insurance application solely on the basis of the MID information.

3.3. Member companies shall not substitute information received from the MID for the routine medical, investigatory, and other standard procedures in the underwriting process.

3.4. It is incumbent upon the member company to investigate all applications with MID records. This should be done without citing the MID as the source of the information.

3.5. As a matter of procedure, the member company may also check for any records under the maiden name of a married female applicant/proposed insured as an additional inquiry procedure.

4. Inquiries and Exchange of Information

4.1. Where an MID record necessitates further investigation, the channel of communication shall be discreet such that there shall be no breach of confidence.

4.2. The underwriting decision or action of the reporting company with regard to any case shall be respected and shall not become a point of contention in any inquiry.
4.3. No member company shall ask for details of any coded impairment unless it has in its possession a duly accomplished application form of the applicant for insurance/proposed insured.

4.4. Member companies may also request from the reporting company, in addition to clarifications on the impairment, a loan of copy of diagnostic test results, e.g. X-ray film or ECG tracing for comparative purposes. However, the reporting company has the prerogative to refuse the request.

4.5. The member company may disclose MID information on the proposed insured to a reinsurer only in connection with a bona fide facultative offer or cession.

5. Procedures

5.1. What to Report

(a) Member companies shall report to the MID any medical or non-medical impairment that may materially affect the underwriting decision with respect to new individual or group business, policy changes or reinstatements. The impairment is material if it called for any of the following:

- Further investigation, thorough inspection, medical examination, and/or diagnostic tests, and other underwriting requirements
- Acceptance at a substandard rate
- Denial or acceptance of a rider on a rate basis
- Postponement
- Declination

(b) Impairments that do not appear to be covered by, or cannot be classified under the available impairment code listing should be classified under the “letter 100” code of the respective system coding.

5.2. Reporting to the MID Administrator

(a) Since the purpose of the MID is to immediately alert member companies about factors that may have a bearing on an applicant’s insurability, impairments should be immediately coded into the system as soon as it becomes evident that the business will be ratable or unacceptable. It is not necessary to wait for the final underwriting action or payment to put the coverage in force, before reporting the impairments. The Underwriting Action Code “A”, which means that the application is still under process, shall be used in such cases.
(b) Reports should be entered using the MID ENTRY screen of the new MID Web Application. Please refer to the MID User's Manual (note: this is not applicable to Legacy Users)

(c) Corrections/Amendments and Updates (Ticketing System)

- Any request for deletion/change of a record in the database will be submitted as a ticket, for which the user can specify the associated priority (High, Medium, Low).
- Ticket Tracking is also available to check the status of the request (Approved, Declined, etc.)
- The MID Administrator will send the request of the member to the MID Committee for assessment and approval.
- Request shall be processed and action applied within 5 working days upon the submission of the request.

5.3. Maintenance of Records

The MID Administrator shall be responsible for the proper archiving of records through the purging facility of the system, taking into consideration the established policy on purging of impairment codes as established by the MID Committee and approved by the PLIA Board.

5.4. MID Access

Each member company will be given the following:

- MID web application URL
- Company Code, User Names and Passwords (Admin and User)
- User Manual
- Various database code description and definition, as well as types of amendment request, as shown in the following tables:

6.4.1. Action Codes Description and Definition

<table>
<thead>
<tr>
<th>Action Code</th>
<th>Description</th>
<th>Definition</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>Application is still under processing</td>
<td>For all applications wherein underwriting actions have not been completed because requirements are still to be submitted.</td>
</tr>
<tr>
<td>C</td>
<td>Cancelled</td>
<td>Application is rated; however, this was cancelled either voluntarily by the applicant or by the company.</td>
</tr>
<tr>
<td>Code</td>
<td>Description</td>
<td>Notes</td>
</tr>
<tr>
<td>------</td>
<td>------------------------------</td>
<td>----------------------------------------------------------------------</td>
</tr>
<tr>
<td>D</td>
<td>Declined</td>
<td>Application is not acceptable.</td>
</tr>
<tr>
<td>DR</td>
<td>Declined Rider</td>
<td>Base plan accepted at Standard rate; however, accident or disability benefit rider is declined.</td>
</tr>
<tr>
<td>I</td>
<td>Incomplete</td>
<td>Cases with adverse information on which definite underwriting action cannot be rendered because of incomplete evidence of insurability.</td>
</tr>
<tr>
<td>P</td>
<td>Postponed</td>
<td>Application is not acceptable at the time of application but may be reconsidered when the life to be insured has fully recovered or improved from the impairment causing the postponement.</td>
</tr>
<tr>
<td>R</td>
<td>Rated</td>
<td>Application is accepted at Substandard rate for life, whether riders are standard, rated or declined.</td>
</tr>
<tr>
<td>Rec</td>
<td>Reconsidered</td>
<td>Application has been reconsidered and accepted at Substandard rate after a case has been postponed or declined. This action code can also be used when a case has been accepted at a lower substandard rating from a higher substandard rating after submission of favorable test results.</td>
</tr>
<tr>
<td>RR</td>
<td>Rated Rider</td>
<td>Application is accepted at Standard rate for life; however, rider is accepted at Substandard rate.</td>
</tr>
<tr>
<td>S</td>
<td>Standard</td>
<td>Application is accepted at Standard rate after a case has been reported &quot;A&quot;, still under process. This action code can also be used after a case has been rated, postponed or declined but reconsidered at Standard rate. This is a system provision to prevent unnecessary requests for deletion of entries.</td>
</tr>
</tbody>
</table>

Examples:

Application is still under process – A

- Proposed Insured (PI) was discovered to have elevated liver enzymes upon submission of routine blood examination.
- Company XYZ is still requiring PI to undergo Ultrasound of the Liver to confirm findings. While waiting for the submission of the additional requirements, Company XYZ reports its initial findings of elevated liver enzymes (OWL35) to the MID under action code A.
Proposed Insured (Pl) was discovered to have elevated liver enzymes upon submission of routine blood examination.

Company XYZ rates Pl and releases a Substandard/Counter-offer letter.

While waiting for acceptance of the Substandard/Counter-offer letter, Company XYZ reports findings of elevated liver enzymes (OWL35) to the MID under action code A.

Cancelled – C

Proposed Insured (Pl) was rated for Hypertension and was reported to the MID (OWD1(130.90)) under action code R (Rated).

Pl did not accept the substandard rate and the application is now under a Not Taken Up (NTU) status with Company XYZ.

Company XYZ reports the same data to the MID under action code C.

Declined – D

Company XYZ declines the application of PI due to Myocardial Infarction with Surgical Intervention (CABG).

Company XYZ reports to the MID (OWD10a, D11a) under action code D.

Declined Rider – DR

PI applied for a Whole Life plan with Accidental Death Benefit and Waiver of Premium riders.

Company XYZ accepted PI’s application for a Whole Life plan; however, it declined its riders due to Scoliosis.

Company XYZ reports to the MID (OWN8) under action code DR.

Incomplete – I

PI submits application and declares he is diagnosed with Diabetes Mellitus Type 2.

Company XYZ requires PI to submit for a Full Medical Examination, Microurinalysis, Fasting Blood Sugar, Glycosylated Hemoglobin, Attending Physician’s Statement and Diabetic Questionnaire

PI voluntarily withdraws his application.

Company XYZ reports to the MID (OWE01) under action code I.

Postponed – P

Proposed Insured (Pl) has Pulmonary Tuberculosis (PTB), under treatment and underwriting action is to postpone the acceptance of the case.

Company XYZ reports to the MID under action code P.
Rated - R

- Proposed Insured (PI) has controlled hypertension and underwriting decision is to accept the risk at Table B for life, WPD at 1.5x standard, ADB standard.
- Company XYZ reports to the MID under action code R.
- Proposed Insured (PI) has cardiomegaly and underwriting decision is to accept the risk at Table D for life, no riders.
- Company XYZ reports to the MID under action code R.

Reconsidered - Rec

- Proposed Insured (PI) has a positive HBsAg test result and underwriting decision is to postpone the acceptance of the case. Company XYZ reports to the MID under action code P. Thereafter, PI submits Hepatitis B Profile test results with HBeAg negative and Anti-HBe positive conveying a convalescent Hepatitis B infection. Company XYZ accepts the case at Table H for life. Company XYZ reports to the MID (same impairment codes) under action code Rec.
- Proposed Insured (PI) has diabetes and is rated at Table F due to a high FBS result. Company XYZ reports to the MID under action code R. Thereafter, PI submits a normal HbA1c result and the rating is lowered to Table D. Company XYZ reports to the MID (same impairment codes) under action code Rec.

Rated Rider - RR

- Proposed Insured has a hazardous occupation and underwriting decision is Standard for life, WPD at 1.5x standard, ADB at 1.5x standard.
- Company XYZ reports to the MID under action code RR.

Standard - S

- Proposed Insured (PI) declared he had a recent UTI and medical requirements were issued to the agent. Company XYZ reports to the MID under action code A. Additional medical requirements are complied with and underwriting decision is to accept the case at Standard rate. Company XYZ reports to the MID (same impairment codes) under action code S.
- Proposed Insured (PI) has an abnormal ECG and underwriting decision is to accept at Sub-standard rate. Company XYZ reports to the MID under action code R. Thereafter, PI submits a favorable Treadmill Test result and underwriting decision is to accept at Standard. Company XYZ reports to the MID (same impairment codes or a code pertaining to a normal test result e.g. D33S) under action code S.
- Proposed Insured (PI) applies for a life insurance policy with Company XYZ but has an existing MID record reported by Company ABC under action code R for anemia. PI complies with the medical requirements of Company XYZ including a normal
CBC result and case is accepted at Standard. Company XYZ reports to the MID with a letter code of Z (Recovery from impairment) and an action code of S.

6.4.2. Letter Codes Description and Definition

<table>
<thead>
<tr>
<th>Letter Code</th>
<th>Description</th>
<th>Definition</th>
</tr>
</thead>
<tbody>
<tr>
<td>M</td>
<td>Death</td>
<td>Pertains to impairment resulting to death and can only be used with number codes 1-6.</td>
</tr>
<tr>
<td>W</td>
<td>Discovery of the impairment</td>
<td>Pertains to any disorder newly discovered upon application.</td>
</tr>
<tr>
<td>X</td>
<td>Operation</td>
<td>Pertains to any surgical operation performed.</td>
</tr>
<tr>
<td>Y</td>
<td>Treatment</td>
<td>Pertains to any intervention or treatment performed to resolve an impairment.</td>
</tr>
<tr>
<td>Z</td>
<td>Recovery from impairment</td>
<td>Pertains to any resolved impairment of currently existing MID record and can only be used if MID record is existing.</td>
</tr>
</tbody>
</table>

6.4.3. Amendment Requests

<table>
<thead>
<tr>
<th>Requested Action</th>
<th>Description</th>
<th>Example</th>
</tr>
</thead>
<tbody>
<tr>
<td>Corrected</td>
<td>To correct an erroneous entry</td>
<td>(a) Updating Data/correction of wrongly-typed lab results.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Previous urinalysis showed trace albuminuria. Repeat urinalysis done was negative for albumin.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Initial chest X-ray showed pneumonia. Follow-up chest X-ray showed resolution of the pneumonic infiltrates.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>BP = 180/100 mmHg - Hypertension, uncontrolled to Hypertension, controlled (current).</td>
</tr>
<tr>
<td>Deleted</td>
<td>Can only be used for typographical errors, wrong MID entry (whole entry)</td>
<td>From Hyperlipidemia to Normal Lipid Profile</td>
</tr>
<tr>
<td>---------</td>
<td>-------------------------------------------------</td>
<td>----------------------------------------------</td>
</tr>
<tr>
<td></td>
<td>(a) Deletion of impairment</td>
<td>(b) Wrong impairment or impairment code entry</td>
</tr>
<tr>
<td></td>
<td>Mr. Juan dela Cruz, 14 yrs. old, was initially diagnosed to have Kawasaki's Disease. After a thorough investigation on him, tests have finally ruled out the disease and thus the MID data should be deleted.</td>
<td>Instead of recording D100 which codes for other impairments of the cardio-cerebrovascular system not classified elsewhere, D10 was typed, which codes for acute myocardial infarction.</td>
</tr>
<tr>
<td></td>
<td>(b) Deletion of laboratory result</td>
<td>Instead of left ventricular hypertrophy, encoded was right ventricular hypertrophy.</td>
</tr>
<tr>
<td></td>
<td>Deletion of erroneously recorded lab result</td>
<td>(c) Replacement with corrected data</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Abnormal blood test result showed FBS of 800. After investigation, it was found out that it was not clinically correlated and that the value was erroneously reported; instead, it should have been FBS = 80 mg/d.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>After careful analysis, ECG reading of poor R wave Progression was corrected and changed to within normal limits.</td>
</tr>
</tbody>
</table>
1. PLIA shall serve as the MID System Administrator, responsible for:

1.1. certifying to the acceptability of the MID System regarding its performance in accordance with the functional specifications established by the MID Committee; its network and information security provisions for both efficiency and data privacy concerns as laid out by the PLIA IT Committee; as well as its adaptability for interfacing by MID Member Company which makes use of a legacy system that requires downloading and uploading of text files;

1.2. ensuring that the network infrastructure is performing at expected efficiency levels at all times to allow users of MID Member Company unimpeded access to the system (Annex A: MID System Network Design);

1.3. upkeep of all hardware associated with the MID System;

1.4. maintaining confidentiality and security of information residing in the MID database (Annex B: MID System Security Features);

1.5. seeing to the readiness of business continuity and disaster recovery mechanisms to be activated as needed (Annex A: MID System Network Design);

1.6. regularly creating backup copy of the MID database in accordance with the business continuity plan specifications (Annex A: MID System Network Design);

1.7. supervising the conduct of regular vulnerability assessment and penetration testing by an engaged professional cyber security service provider to ensure protection of the system from risks of unauthorized external access (Annex C: Risk-Based Information Security Process);

1.8. effecting deletion of or amendments to database records as requested by MID member company, through Ticket submission, and as duly approved by the PLIA MID Committee, within five work-days from receipt of request;

1.9. determining at every start of the year the required budget to maintain and/or do any agreed modification/enhancement to the system, then billing the MID member company its share following the approved distribution formula.
2. The MID Member Company shall be responsible for:
   
   2.1. sharing in the cost of maintaining and/or further developing the MID system to make it more responsive to the needs of the users;
   
   2.2. keeping information received from the MID System strictly confidential and well-secured;
   
   2.3. limiting the use of MID information to processes involving underwriting or claims administration, and only to authorized personnel performing such functions or others specifically given such authority;
   
   2.4. providing PLIA with regular information in relation to status of users and their authorities;
   
   2.5. using the latest version of supported web browsers (Internet Explorer, Mozilla Firefox or Google Chrome) which have built-in anti-spyware and malware tools;
   
   2.6. using updated anti-virus applications for the protection of internal network.
I. Network Design

2. Highlights

2.1. The TIM-Carmona co-location site server is used as the Production unit in consideration of the facility's secured environment which provides protection against fire, power supply failure, earthquake resiliency up to Magnitude 8, rigid protocols for access to the server room and availability of CCTV coverage for the entire facility.

2.2. The Production site has two leased line connections while the Backup site has one leased line and one DSL line, all with a bandwidth of 4 mbps each, which allows for load balancing capability. This load balancing capability ensures that the network can accommodate peak utilization during underwriting cutoff periods without losing response time.

2.3. A Test Server has also been installed in the Production site for the dual purposes of hosting a test environment during times of system enhancement/development, as well as acting as a secondary backup facility to the PLIA network, should the unlikely scenario of both the Production and Primary Backup sites failing at the same time happens.
2.4. Database backup procedures:

(a) At the end of each day, a full backup of the Production database shall be stored in a separate partition of the Production server, as well as in the Backup server at the PLIA office and the Test Server at the Production site.

(b) During work-days, an incremental copy of the Production database shall be created every 30 minutes and reside in a separate partition in the Production server.
IV. MID SYSTEM SECURITY FEATURES


2. Hardened firewall

A firewall is a network security system that controls the incoming and outgoing network traffic based on an applied rule set. A firewall establishes a barrier between a trusted, secure internal network and another network (e.g., the Internet) that is assumed not to be secure and trusted. (Source: Wikipedia).

Hardening a computer is an important step in the fight to protect personal data and information. This process works to eliminate means of attack by patching vulnerabilities and turning off inessential services. Hardening a computer involves several steps to form layers of protection like using antivirus and antispyware protection, regularly downloading the latest manufacturer patches, and disabling unneeded software and applications leads to safer, more secure computers which are harder to break into. (Source: Office of Information Technology, University of Colorado Boulder)

3. IP (internet provider) white listing

A whitelist is a list or register of those that are being provided a particular privilege, service, mobility, access or recognition. Those on the list will be accepted, approved or recognized. (Source: Wikipedia).

With the MID System, only the member company IP addresses are put into the white list. This means that MID users cannot access the system using their personal IP addresses or those in public networks (internet café). They can only access the MID System through their company network.

4. Closed telecom network and other ports: this is a process of plugging threat of external vulnerability to hacking through access to open ports

5. Access to site via “https”

HTTPS is a communications protocol for secure communication over a computer network, with especially wide deployment on the Internet. The main motivation for HTTPS is to provide authentication of the visited website and to protect the privacy and integrity of exchanged data. (Source: Wikipedia)
6. DMZ

In computer security, a DMZ or demilitarized zone (sometimes referred to as a perimeter network) is a physical or logical subnetwork that contains and exposes an organization's external-facing services to a larger and untrusted network, usually the Internet. The purpose of a DMZ is to add an additional layer of security to an organization's local area network (LAN); an external network node only has direct access to equipment in the DMZ, rather than any other part of the network. (Source: Wikipedia)

7. Anti-virus updates: protects the network against viruses, spywares, etc.

8. Windows updates: resolves general Windows issues and bugs, as well as provides protection from malwares and malicious software

9. Enable logs

Event logs record events taking place in the execution of a system in order to provide an audit trail that can be used to understand the activity of the system and to diagnose problems (Source: Wikipedia)

10. Secured authentication: protects the account of the user from being used by an unauthorized user

11. Encrypted files for uploading and downloading for members using legacy system: encrypting files is a way to protect them from unwanted access

12. Group Policy

Group Policy is a feature of the Microsoft Windows NT family of operating systems that controls the working environment of user accounts and computer accounts. Group Policy provides the centralized management and configuration of operating systems, applications, and users' settings in an Active Directory environment. (Source: Wikipedia)

13. Network architecture review: a process that identifies how the network architecture and controls protect critical assets, sensitive data stores and business-critical interconnections in accordance with the organization's business and security objectives

14. Security for legacy users

14.1. Key management; encryption for extract files; GPG sharing keys; annual re-keys

This is a way of securing the files whereby they cannot be readable without a third party tool to view the output.

14.2. Securing admin account; column level encryption for tables to protect against internal penetration

This is aimed at securing the access by use of alphanumeric or special characters in user IDs and passwords.
14.3. Manual upload and download by user login

A process where the administrator will log in into the web application and do the transaction on a manual process.
V. RISK-BASED INFORMATION SECURITY PROCESS

In order to continually manage the IT Security risks of the MID System, a professional service provider is engaged for a continuous security assessment. This service offers a comprehensive Cybersecurity Framework that involves not only VAPT (vulnerability and penetration testing) but also a full IT Risk Management Lifecycle including the development of policies and procedures for IT Security. These IT Security Assessment services are built-on a series of information security best practices that are widely accepted across industries and organizations. It includes the NIST Cybersecurity Framework, ISO-27001, PCI-DSS Version 3 customized to protect the Member's Records instead of Credit Card data, Penetration Testing Execution Standard, OWASP Top 10, SANS Top 20 Security Controls and Open Source Security Testing Methodology Manual.

In context, the IT Security Services is geared towards preventing insecure passwords, misconfigured network devices and systems, poorly maintained anti-virus program, never patching the machines or hosts, insecurely storing data, being too generous with permissions, never testing backups, never monitor logs, and no policies and procedures in place. As a result, it will protect against exposure of confidential Member's Records, denial of service attacks, hacking attacks, failure to backup data, virus/malware infections, unsecured applications, and social engineering attacks.

The scope of the services covers the perimeter network, hosts and servers, web application, database, and workstations located in the PLIA Head Office and the Disaster Recovery site. It also includes the creation of policies and procedures as well as the review of existing security controls. The services being offered is built on the NIST Cybersecurity Framework that identifies (Asset Management, Understanding the Business environment of PLIA, IT Risk Assessment, and definition of IT Risk Mitigation Strategies); protects (Access Control, Awareness and Training, Member’s Records Security, Information Security Policies and Procedures, and Vulnerability Assessment and Penetration Testing); detects (Security Information and Events Log Management, Security Monitoring and detection process); responds (Incident Response Planning, Communications, Analysis, Mitigation, and Improvements); and recovery (Business Continuity and Disaster Recovery Planning and Improvements).

The main goal is Member Record Security, by diligently performing the following activities:

- Identification and Mitigation of IT Risks
- Building and Maintaining a Secure Network and Systems
- Protecting Members’ Records
- Maintaining a Vulnerability Management Program
- Implementing Strong Access Control Measures
- Regular Monitoring and Testing of the Network
- Maintaining an Information Security Policy
VI. MID SYSTEM GUIDE

MID website address: https://medinfex.org

Step I (By PLIA Administrator)

Proceed to Step II assuming that Member Company already exists with assigned Administrator.

Step II (By Member Users)

Create Company Members / Users (through Member module)

1. Log-in as Member Administrator.
2. Go to Administrator >> Manage Users >> Add User
3. Fill in member details.
4. Under User Group field, select appropriate User Group. If Administrator, the user will be granted with full access. Otherwise, he will have limited access depending on the selected group's settings.
5. Click Save button.

Note: Each group consists of multiple Users that share one or more roles. Only the administrator has full control in defining group roles. If a user has no rights to a certain module, he will be notified that he has no access on that page.
Manage User Groups

1. Log-in as Member Administrator.
2. Go to Administrator >> Manage User Groups
3. To Add a new Group, click Add New button and fill in Group Details and click Save button.
4. To Edit a Group click Edit button and do the necessary changes and click Save button.
5. To Delete a Group, click Delete button and confirm if you want to proceed with the deletion.

Note: There are default User Groups. A new user group can be created if Member Administrator prefers.
Managing User Groups – Add New > Save

Assign Users to a Group

1. Log-in as Member Administrator.
2. Go to Administrator >> Manage User >> Edit
3. Choose a User Group >> Save

Note: User access depends on the group where the user is part of. There are currently four Group Roles, listed as follows:

1. Administrator – Can access features under Administrator link.
2. Data Entry – Can access MID Entry and allowed to edit an entry.
3. Inquiry – Can search and view entries.
Managing User Groups – Assign User to a Group

Step III (By Member Users)

Create MID Entry (Personal Information and Impairment Information)

1. Log-in as member.
2. Go to MID Records >> MID Entry
3. Fill in required information. Labels in blue are required.
4. After completing the form, click Save button.

Note:
- Keep in mind the limited role you have assigned the User.
- User can add multiple Impairment Information at one time in creating a new record.
Step IV (By Member Users)

Make an Inquiry (Search)

1. Log-in as Member.
2. Go to MID Records >> MID Inquiry
3. You may fill in the search form partially or fully. Giving no information to search will result in full listing of records.
4. Click Search button.

Note: Only search Entry by using exact information except in Wild Search. Otherwise, a partial search of name will result to 0 or incorrect results.
MID Records – MID Inquiry

View Details

1. From Inquiry Step number 4, select desired record to view and click View Details on the right portion of the row.
Add Impairment Information

1. After Viewing Details step one, click Add Impairment Information button on the lower right part of the page.
2. Fill-in required information. Labels in blue are required.
3. After completing the form, click Save button.

Note:
- User can only add one Impairment Information at a time.
- User can only add multiple Impairment Information at one time in MID Entry.
MID Records – MID Inquiry > Add Impairment Information

Edit Personal Information

1. Log-in as Member
2. Go to MID Records >> MID Inquiry
3. You may fill in the search form partially or fully. Giving no information to search will result in full listing of records.
4. Click Search button.
5. Click Edit button on the right portion of the row.
6. Make the necessary changes.
7. Click Save button.
MID Records – MID Inquiry > Edit
MID Records – MID Inquiry > Edit Personal Information

Edit Impairment Information

1. From Inquiry Step number 4, click View Details button on the right portion of the row.
2. Select the impairment information you want to edit by clicking Edit.
3. Make necessary changes.
4. Click Save button.
### MID Records – MID Inquiry

#### View Details

#### Select to Edit

---

**Medical Information Bureau**

**MID Records** - **MID Inquiry**

<table>
<thead>
<tr>
<th>LAST NAME</th>
<th>MAIDEN NAME</th>
<th>MIDDLE NAME</th>
<th>GENDER</th>
<th>COMPANY</th>
<th>ACTION</th>
</tr>
</thead>
<tbody>
<tr>
<td>Last Name</td>
<td>Maiden Name</td>
<td>Middle Name</td>
<td>Gender</td>
<td>Company</td>
<td>Action</td>
</tr>
</tbody>
</table>

**Personal Information**

<table>
<thead>
<tr>
<th>LAST NAME</th>
<th>MAIDEN NAME</th>
<th>MIDDLE NAME</th>
<th>GENDER</th>
<th>DATE OF BIRTH</th>
<th>NATIONALITY</th>
<th>ADDRESS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Last Name</td>
<td>Maiden Name</td>
<td>Middle Name</td>
<td>Gender</td>
<td>Date of Birth</td>
<td>Nationality</td>
<td>Address</td>
</tr>
</tbody>
</table>

**Medical Information**

<table>
<thead>
<tr>
<th>DATE REPORTED</th>
<th>UNDERWRITING DATE</th>
<th>LC CODE</th>
<th>IC CODE</th>
<th>IC DESCRIPTION</th>
<th>ACTION CODE</th>
<th>V/F REMARKS</th>
<th>ACTION</th>
</tr>
</thead>
<tbody>
<tr>
<td>November 14, 2014</td>
<td>November 15, 2014</td>
<td>H1</td>
<td>811</td>
<td>LOSS OF UNIDENTIFIED</td>
<td>8</td>
<td>V</td>
<td>YES</td>
</tr>
</tbody>
</table>
MID Records – MID Inquiry > Edit Impairment Information

Share Personal Information

1. From Inquiry Step number 4, click Edit button on the right portion of the row.
2. Click Share button on the lower right part of the page.
3. If your administrator set the sharing option Subject for approval, it will send a Share request to your administrator.
MID Records – MID Entry > Edit to Share
MID Records – MID Entry > Share Personal Information

Share Impairment Information

1. From Inquiry Step number 4, click View Details button on the right portion of the row.
2. Select the impairment information you want to share by clicking Edit.
3. Click Share button.
4. If your administrator set the sharing option Subject for approval, it will send a Share request to your administrator.
MID Records – MID Inquiry > Share Impairment Information

Notes on Share:

- Records with pending Share approval will display Share icon “S” when searched in MID Inquiry.
- All impairments added while Share request is pending will be shared once approved.
- Any impairments added after Share request is approved will require separate Share request.

Make a Change Request

1. From Inquiry Step number 4, click Change Request button on the right portion of the row.
2. Fill in the request form and change the information you want to change on the lower part of the form.
3. Click Submit button.

Note: Change Request button will only appear if the record has been shared.
MID Records – MID Inquiry > Change Request

MID Records – MID Inquiry > Change Request Page
Make a Deactivation Request

1. From Inquiry Step number 4, click Deactivation Request button on the right portion of the row.
2. Fill in the request form and change the information you want to change on the lower part of the form.
3. Click Submit button.

Note: Once deactivated, Impairment record will no longer appear in Impairment Information list.
MID Records – MID Inquiry > Confirm Deactivation Request
Step V (By Member Users)

Approve a Share Request

1. Log-in as Member Administrator.
2. From Dashboard, choose and click the number under “Approvals for Sharing” column.
3. Click Approve button.

Note: User can select multiple Share Requests for Approval.
Other Functions

Update System Parameters

1. Log-in as Member Administrator.
2. Go to Administrator >> System Parameters.
3. Check item if you want to set it to true/yes, remove check otherwise.
4. Click Save button.

Note: Only Member Administrator has the rights to set system parameters.
Update Account Settings

1. Log-in as Member User.
2. Go to Account Settings.
3. Make the necessary changes.
4. Click Save button.

Note: Each Member has rights to modify his/her account settings.

Account Settings > Member Administrator
Account Settings > Member User

<table>
<thead>
<tr>
<th>USER ID</th>
<th>EMAIL</th>
<th>FIRST NAME</th>
<th>LAST NAME</th>
<th>MOBILE NUMBER</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
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</tr>
</tbody>
</table>

**MEDICAL INFORMATION**

- [View Information]