



Compliance Program Presentation
to the
MHBE Board of Trustees

Presented by
Caterina Pañgilinan
May 18, 2020

Q3 FY2020 Privacy, Audit And Compliance Activities

- ❖ Independent Financial and Programmatic Audit
- ❖ Annual Privacy, IT Security and Fraud, Waste and Abuse Training
- ❖ Privacy Impact Assessment (PIA) - Access to Personally Identifiable Information
- ❖ Secure Faxing Protocol
- ❖ Transition to HIPAA IT Security Requirements for Carriers
- ❖ Office of Legislation Audit (OLA) Finance, Network and General Services Triennial Audits
- ❖ SOC 2 Type 2 Audit Requirement Changes
- ❖ Contract Management Process
- ❖ Policy and Procedure Improvement Project
- ❖ Fully Implement List of Excluded Individuals and Entities Process
- ❖ Revamp Privacy Notice
- ❖ 508 Compliance

Internal Control Reviews

- Improve IRS 1075 Safeguards – Federal Tax Information Background Check Processes
- Improve traceability of verification of consultant timesheets to invoicing to payment process
- Proper Invoice Payments to Connector Entities
- Expand Override Process Verifications
- Inventory and Reconciliation Processes
- Request For Resume Conflict of Interest
- Payment Error Rate Measurement (PERM) Audit Initial Findings
- Procurement Bid Security Process

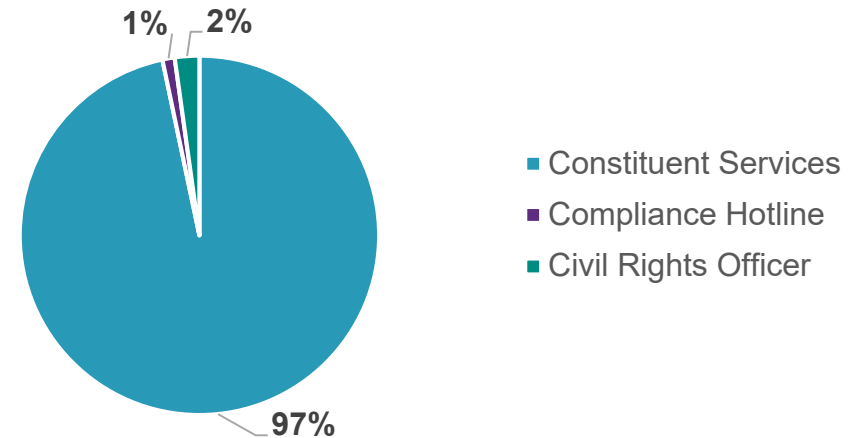
Postponed

- Incorporate Unemployment Compensation Data into Income Verification Process
- Full Implementation of Failure to Reconcile Taxes Process
- Employer-Sponsored Coverage Verification Process
- Internal Revenue Service Safeguards Triennial Review
- Payment Error Rate Measurement (PERM) Audit
- Eligibility Improper Payment Measurement (EIPM) Pilot
- State-based Marketplace Annual Reporting Tool (SMART), Minimum Acceptable Risk Standards for Exchanges (MARSE) and Privacy Impact Assessments (PIA)

FY 2020 Compliance Hotline

3rd Quarter FY20 Compliance Hotline Calls

Department	3rd QTR Calls	FY20 YTD Calls
Constituent Services	102	263
Compliance Hotline	0	3
Civil Rights Officer	2	6
TOTAL	104	272



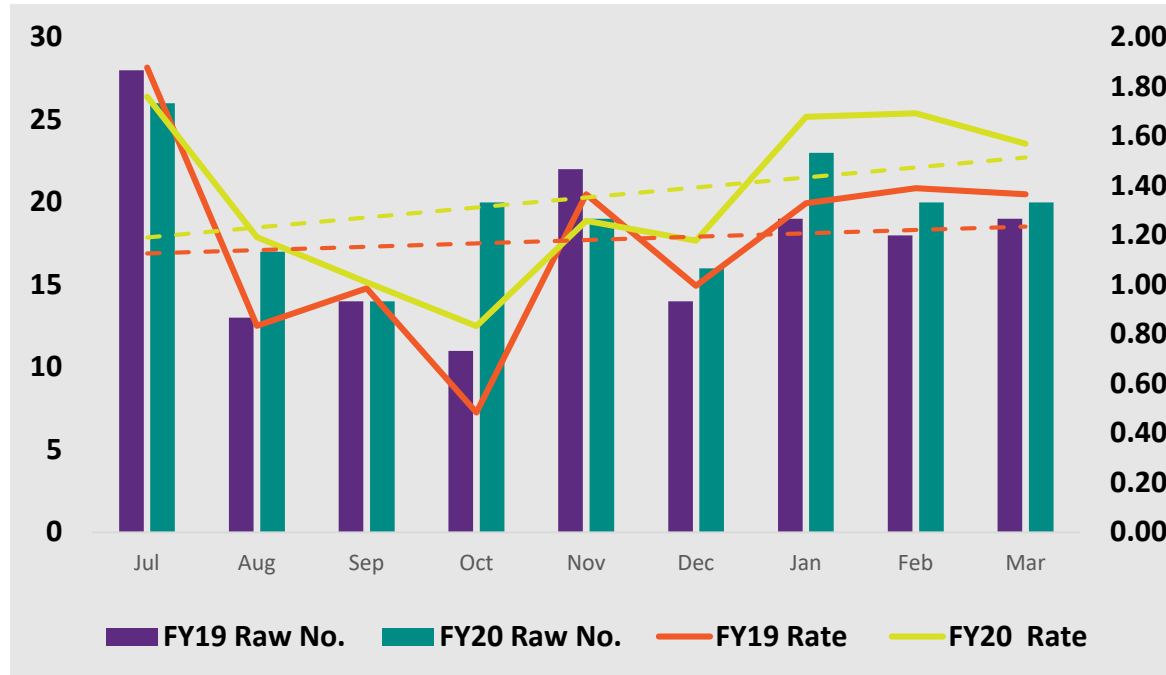
3rd Quarter YTD FY20 Fraud, Waste & Abuse Allegations

14 - Allegations

- ❖ 7 - Not Founded
- ❖ 1 - Partially Founded
- ❖ 5 - Referred
- ❖ 1 - Pending Investigation

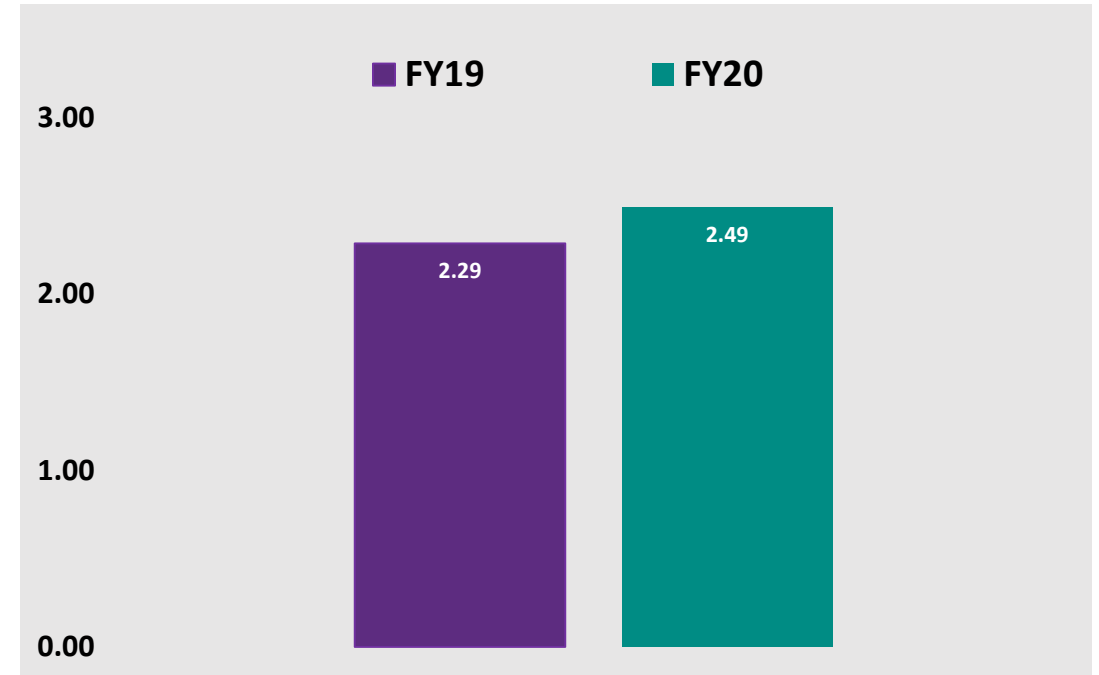
Q3 FY20 YTD PRIVACY INCIDENTS (Non-Producer)

15% Increase in Rate of Privacy Incidents - 1.31 from 1.14



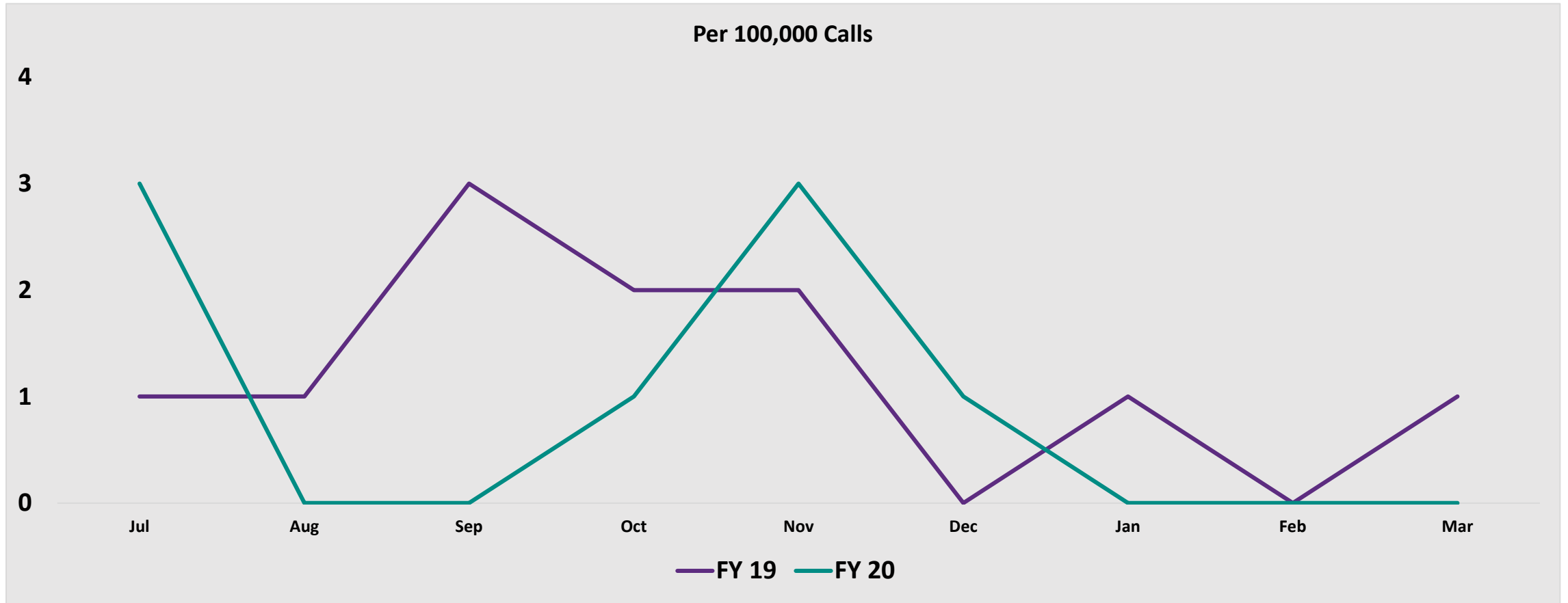
Rate Per 10,000 Enrollments

9% Increase in Rate of Misloads

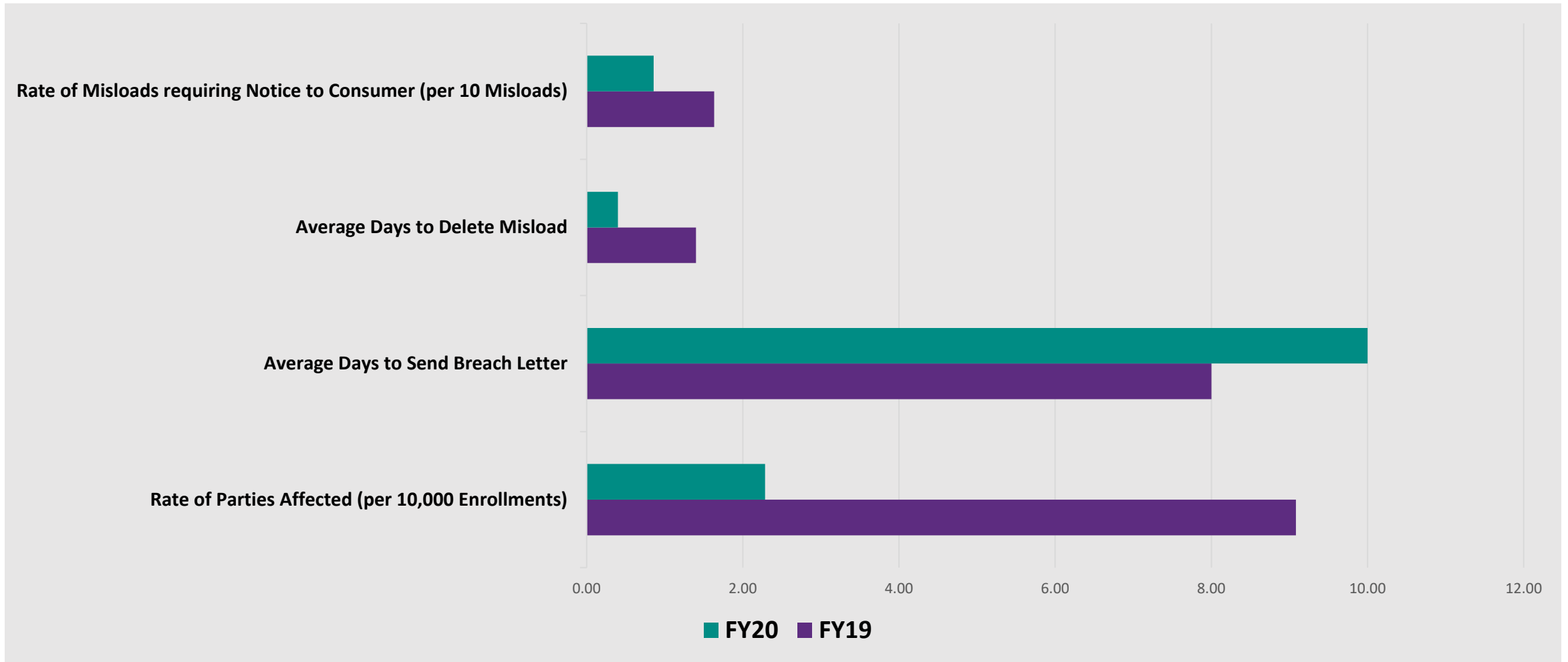


Per 10,000 Uploads

Misloaded Documents



Privacy Incident Mitigation



Questions?

Thank you for your leadership.