Compliance and Privacy Program
Year End FY 2020

Presentation to

MHBE Board of Trustees

Presented by
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September 21, 2020

YE FY2020 Compliance Hotline

Department	4th QTR Calls	YE FY20 Calls
Constituent Services	96	330
Compliance Hotline	3	6
Civil Rights Coordinator	0	6
TOTAL	99	342

YE FY20 Compliance Hotline Calls

2%   2%

- Constituent Services
- Compliance Hotline
- Civil Rights Coordinator

96%
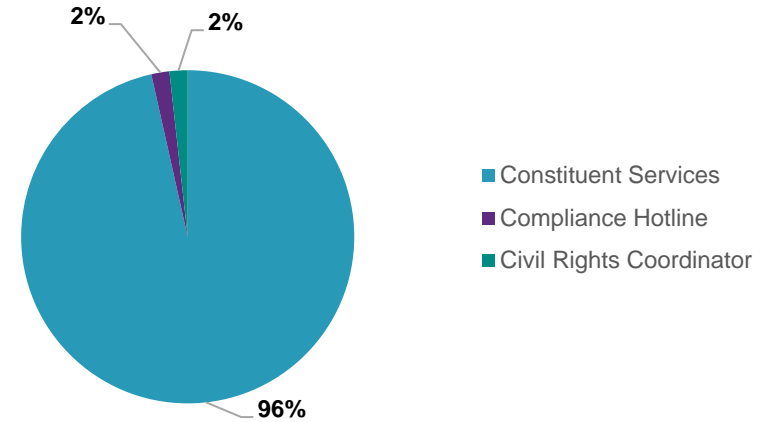
YE FY20 Fraud, Waste & Abuse Allegations

16 - Allegations
- ❖ 10 - Not Founded
- ❖ 1 - Partially Founded
- ❖ 5 - Referred

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FY2020 Compliance Internal Controls

Compliance and Ethics Plan

- ✓ Non-Retaliation Policy

- ✓ Compliance Investigations Policy

- ✓ Audit Control Plan

- ✓ Contract Monitoring and Oversight Policy

- ✓ Enforcement and Discipline Policy

Compliance Tracker Application

FY2020 Compliance and Privacy Training

- ❖ 192 Employees and Consultants

- ❖ 1,265 Producers and Caseworkers

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Internal Review and Monitoring Program

5 Program Reviews

❖ Operations (3)

❖ Procurement

❖ IT Project Management Office (PMO)

5 Interdepartmental Reviews

❖ Reinsurance

❖ FMIS Security Report Review

❖ Periodic Data Matching

❖ FTI Access Process

❖ Request for Resume

16 Corrective Actions Reviews

6 Desktop Audits of Connector Entities

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YE FY 2020 Audit Status Report

Total Audit Findings

(1) Independent External Audit Finance PY19
(0) Recruitment and Evaluation FY19
(0) Independent External Audit Programmatic PY19

Internal Assessments (Pending)

SMART PY19
Privacy Impact Assessment
Minimum Acceptable Risk-Standards State-based Exchange

Open SMART PY18

Employer Sponsored Coverage*
Employer Notices
Failure to Reconcile (FTR) Flags

CMS

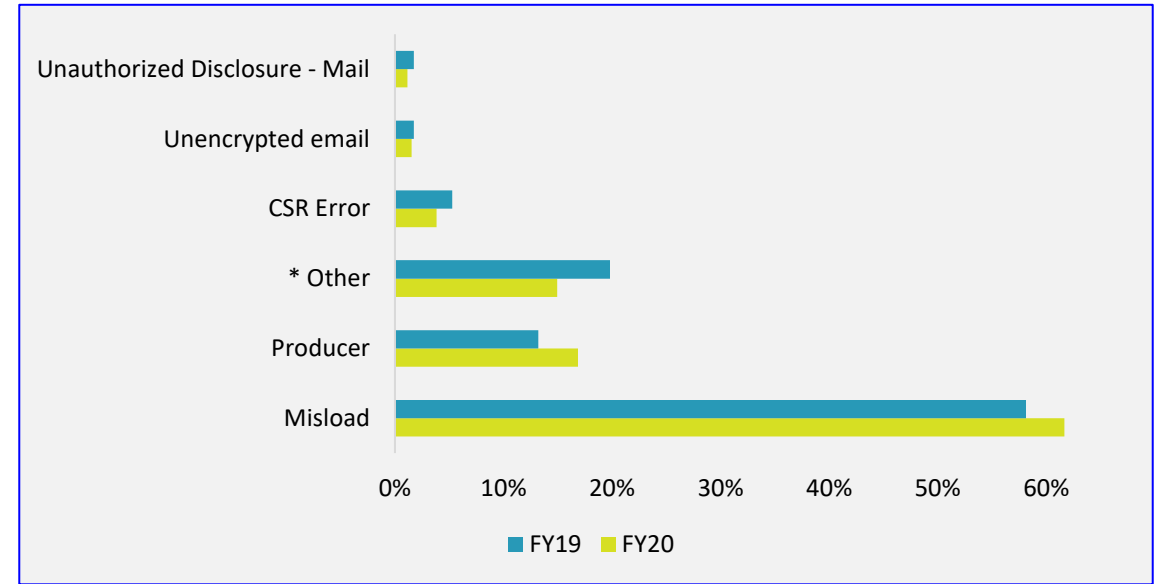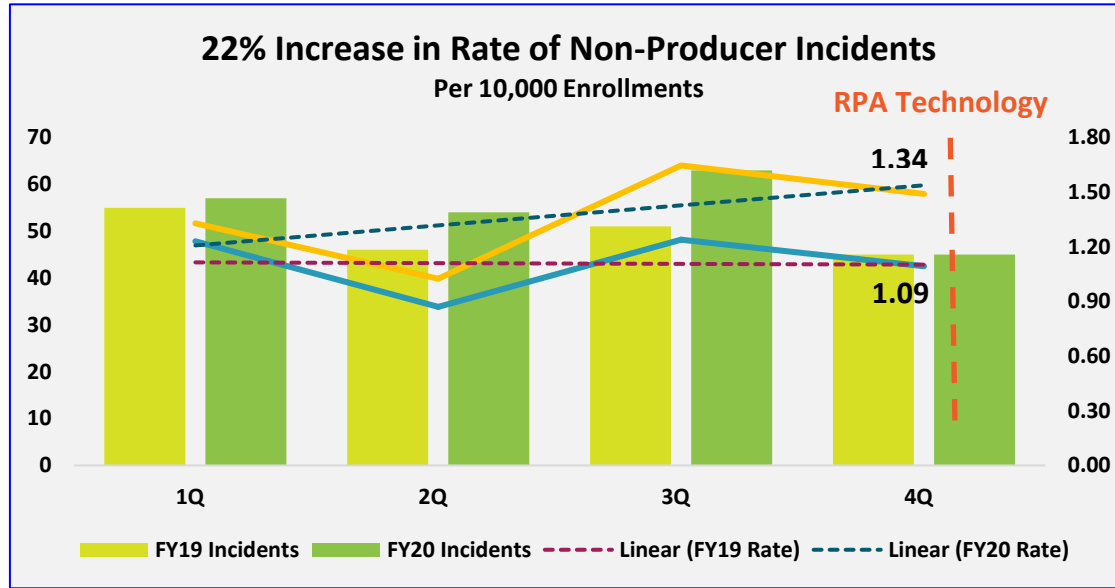Payment Error Rate Measurement
Exchange Improper Payment Measurement
Pilot

Current/Pending Audits

OLA Triennial Financial and IT Audit
IRS 1075 Safeguards Review
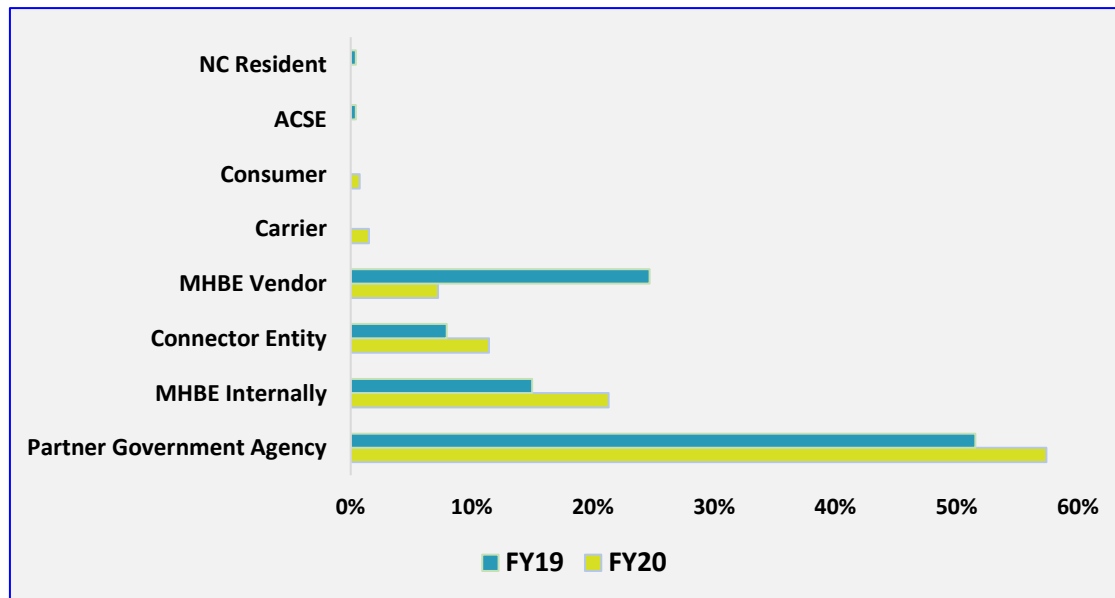
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Auditor Focus Areas

➢ Improve traceability of verification of consultant timesheets to invoicing to payment process

➢ Proper Invoice Payments

➢ Expand Override Process Verifications

➢ Inventory and Reconciliation Processes

➢ Procurement Bid Security

➢ Approvals in FMIS / ADPICS

➢ Payment Methods – Direct Voucher vs. Purchase Order

➢ HBX Role Recertification Campaign

➢ Improve IRS 1075 Safeguards – Federal Tax Information Background Check Processes
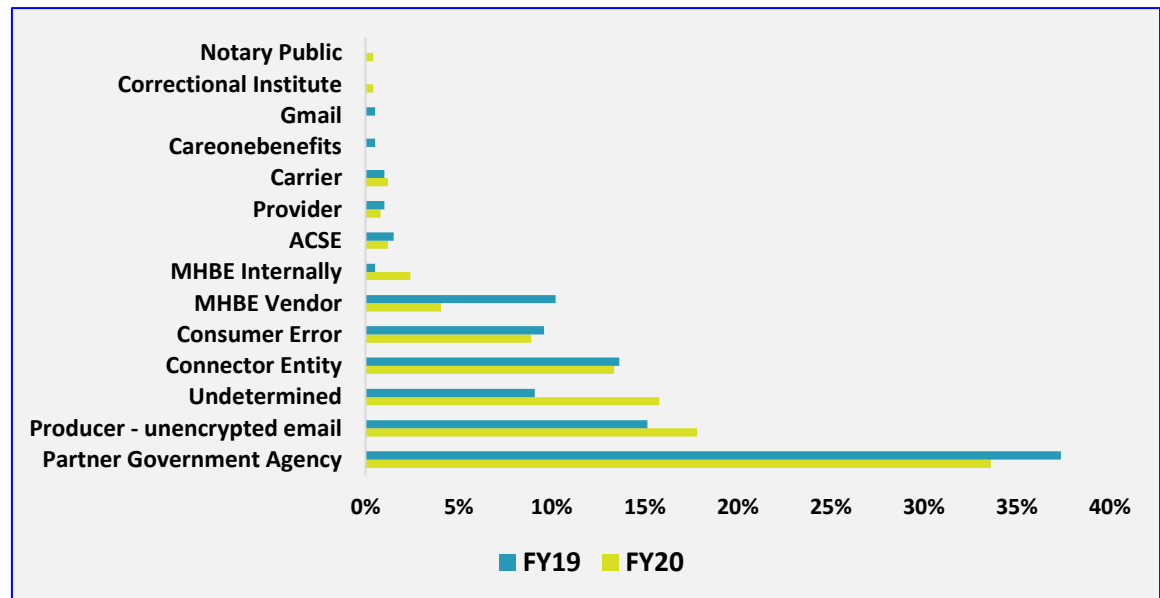
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Year over Year FY20 -19 Privacy Incidents Non-Producer

22% Increase in Rate of Non-Producer Incidents
Per 10,000 Enrollments

RPA Technology

1.34

1.09

Legend: FY19 Incidents | FY20 Incidents | Linear (FY19 Rate) | Linear (FY20 Rate)

X-axis: 1Q, 2Q, 3Q, 4Q

Right chart categories (FY19 / FY20):
- Unauthorized Disclosure - Mail
- Unencrypted email
- CSR Error
- * Other
- Producer
- Misload

X-axis: 0% 10% 20% 30% 40% 50% 60%

Reporting Entities

Categories (FY19 / FY20):
- NC Resident
- ACSE
- Consumer
- Carrier
- MHBE Vendor
- Connector Entity
- MHBE Internally
- Partner Government Agency

X-axis: 0% 10% 20% 30% 40% 50% 60%

Causal Entities

Categories (FY19 / FY20):
- Notary Public
- Correctional Institute
- Gmail
- Careonebenefits
- Carrier
- Provider
- ACSE
- MHBE Internally
- MHBE Vendor
- Consumer Error
- Connector Entity
- Undetermined
- Producer - unencrypted email
- Partner Government Agency

X-axis: 0% 5% 10% 15% 20% 25% 30% 35% 40%

FY20 Privacy Program

- ✓ Privacy Notice – Simplified Language and Included Research

- ✓ Federal Tax Information Access Control Policy

- ✓ Authorized Use and Disclosure of Personally Identifiable Information Policy

- ✓ Record Retention

- ✓ Accounting of Disclosures Policy

- ❖ Executed 668 NEEAs and DUAs

- ❖ Processed 219 Non-Producer and 44 Producer Incidents

- ❖ Responded to 12 Records Requests and/or Subpoenas

- ❖ HBX Improvements – Audit Trail Redesign, Ability to Print Application, HBX Portal for Producer Escalations

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Questions?

Thank you for your leadership.

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