Compliance Program
1st Quarter FY 2021
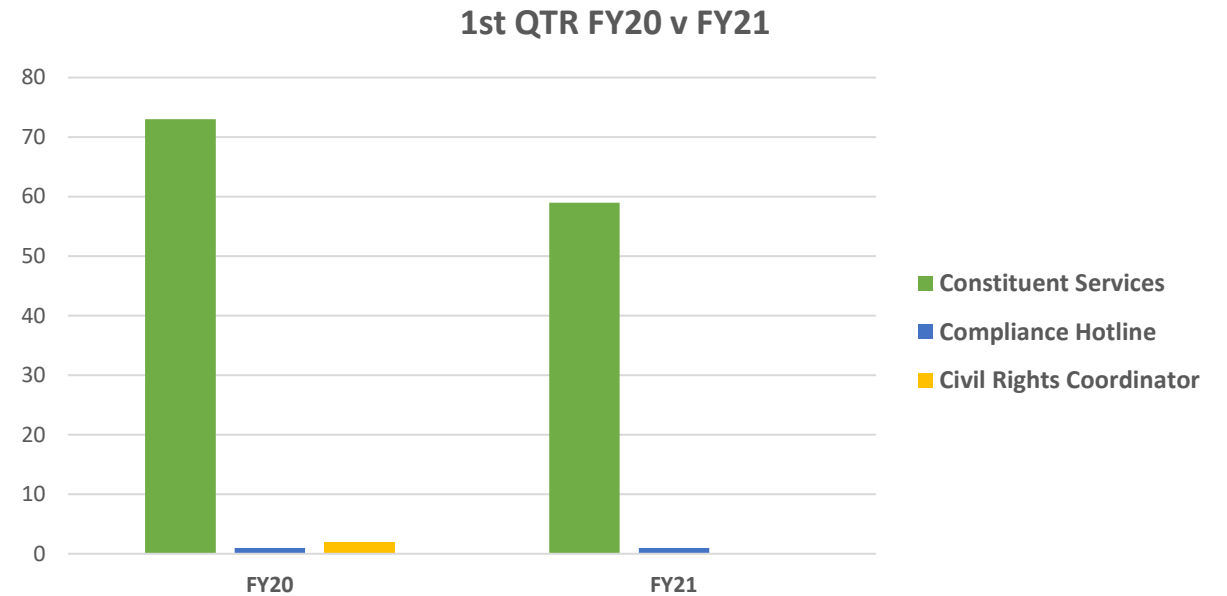
Presentation to

MHBE Board of Trustees

Presented by
Caterina Pañgilinan
November 16, 2020

Q1 FY2021 Compliance Hotline

Department	Constituent Services	Compliance Hotline	Civil Rights Coordinator
FY20	73	1	2
FY21	59	1	

1st QTR FY20 v FY21

- Constituent Services
- Compliance Hotline
- Civil Rights Coordinator

1st QTR FY2021 Fraud, Waste & Abuse Allegations

2 Allegations - Not Founded

Internal Review and Monitoring Program

<u>Q1 FY21 Internal Reviews</u>:

- ➢ Human Resources – Preparation for annual DBM Audit
- ➢ Operations – Connector Entity Annual Reviews
- ➢ Operations – Call Center and Fulfillment Center Contract Monitoring
- ➢ Operations – Appeals & Grievances
- ➢ PMO/Procurement – IDIQ Contract Administration

<u>Q1 FY21 CAP Check-Ins</u>:

- ➢ IT Security – Review of FMIS Security Report
- ➢ Finance – Reinsurance Accruals

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Q1 FY21 Audit Status Report

Total Audit Findings

(1) Independent External Audit Finance PY19
(1) SMART PY19
(0) Recruitment and Evaluation FY19
(0) Independent External Audit Programmatic PY19
(0) Privacy Impact Assessment

Open SMART PY18
Failure to Reconcile (FTR) Flags

Current/Pending Audits

OLA Triennial Financial and IT Audit
IRS 1075 Safeguards Review

CMS

Exchange Improper Payment
Measurement (EIPM) Pilot

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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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508 Compliance Status Update

Section 508 Compliance Training
- ➢ 3 Testing & QA team members completed up to 90% of the training (Dec 2020)
- ➢ Other team members have started and are in the early stages of the training .

Testing
- ➢ Performed Page level testing and identified requirements changes
- ➢ Collaborating with Compliance Sheriff application team to configure the product for MHBE requirements.

Implementation Schedule
- ➢ Responsive Site design addressed several 508 Compliance requirements in the new Consumer Portal (July 2020)
- ➢ Deployment planned for remaining 508 compliance elements for the Consumer Portal and the Worker Portal in:
  - Release 33.1 (December 2020)
  - Release 35 (March 2021)
  - Release 36 (May 2021)

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508 Compliance Scope of Effort

Focusable Elements
- ➤ Tabbing to highlight the links and checkboxes
- ➤ Tab to focus the Espanol Pages
- ➤ Focusable element that has a title attribute have the title's value overlayed on the screen

Graphic/Images
- ➤ Establish accessible name for Images

Links/buttons
- ➤ Establish accessible names for link elements
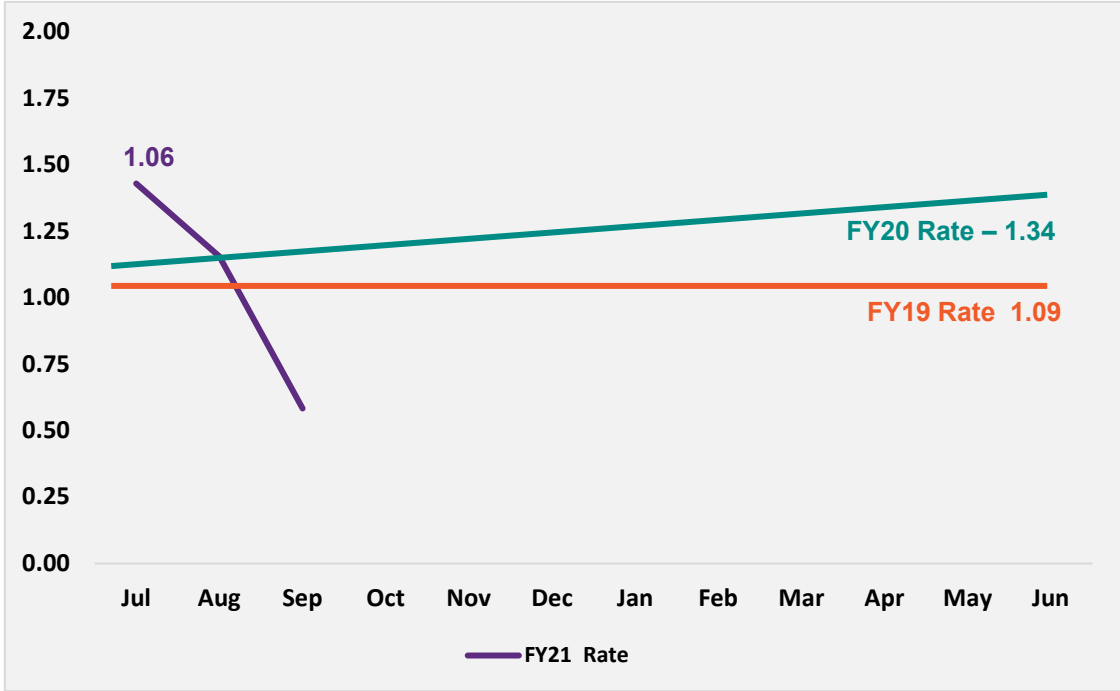- ➤ Enable accessibility with Keyboard
- ➤ Rename ambiguous links

Color Contrast
- ➤ Meet minimum AA contrast ratio (4.5:1)
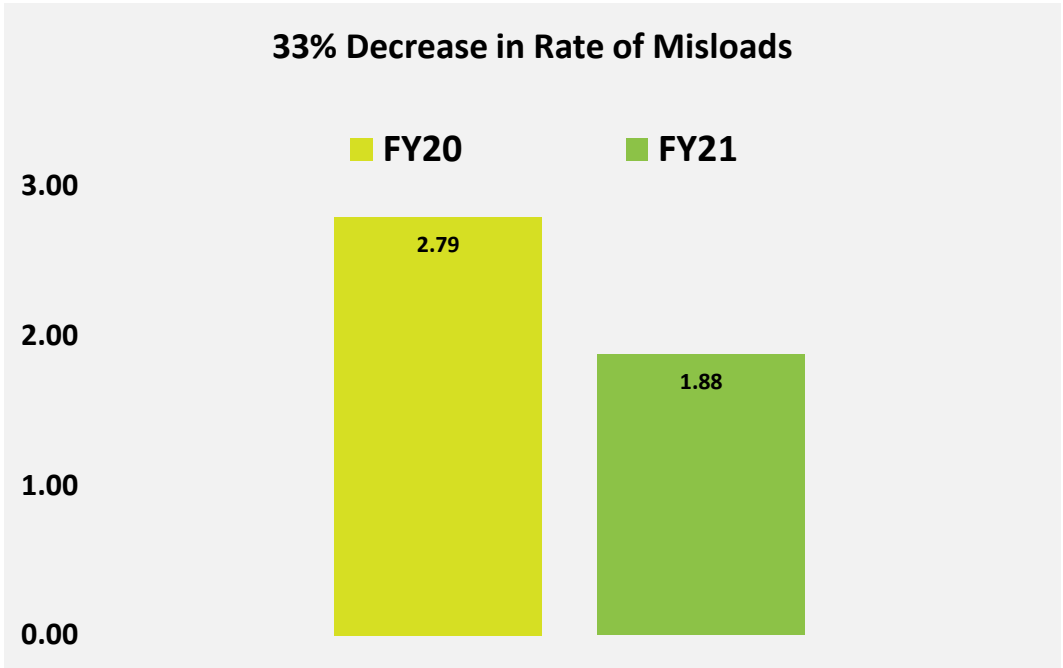- ➤ Meet opacity standard requirements

Hidden Content
- ➤ Make the content available to screen readers

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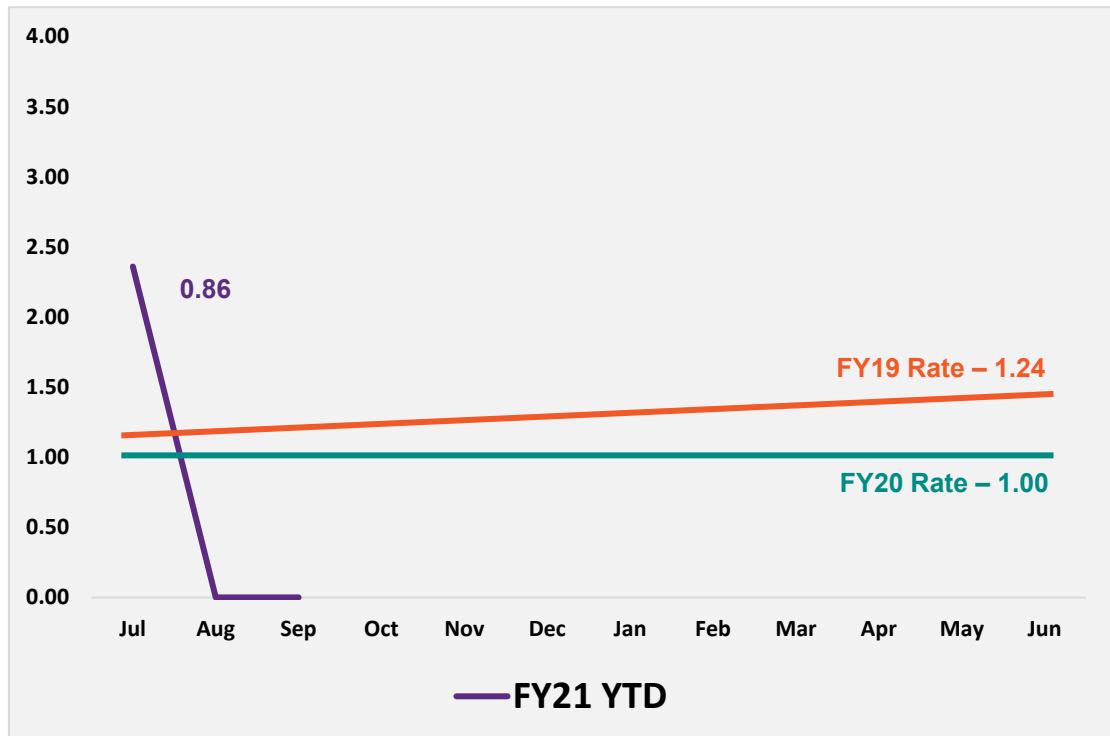# FY21 1Q Non-Producer Privacy Incidents

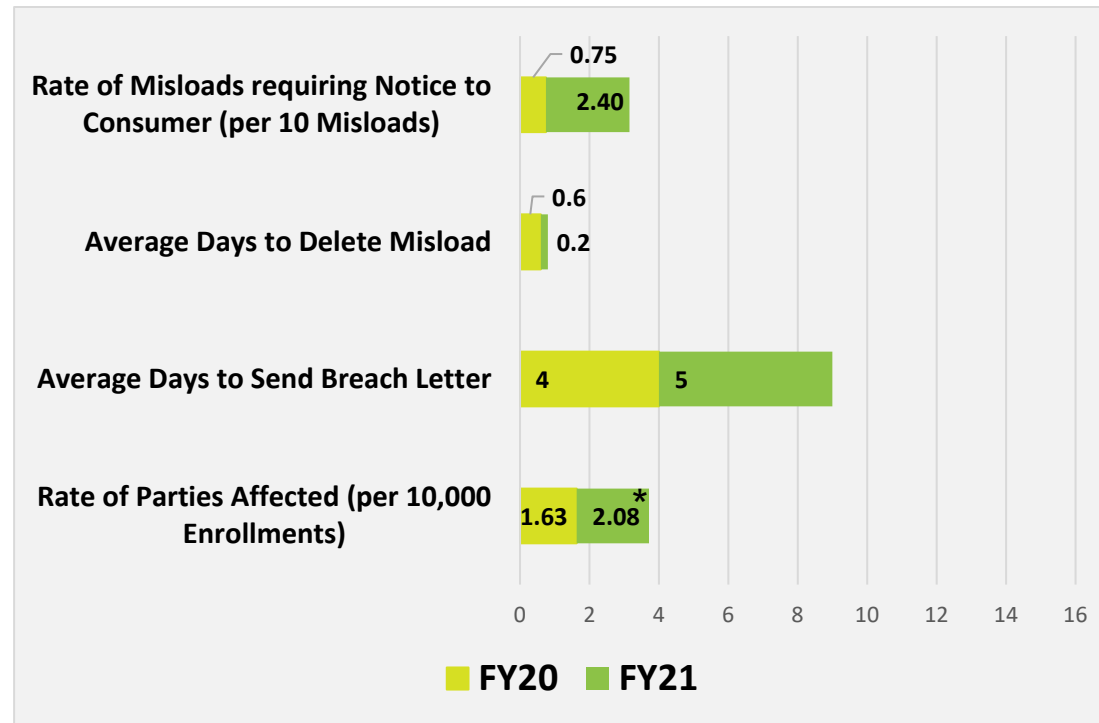**Per 10,000 Uploads**

1Q Rate of Misloads

Per 10,000 Uploads

1Q CSR Error Rate

Per 100,000 Calls

1Q Incident Mitigation

* 972 Rate if MHBE & AHEC West Incidents Included

FY21 YTD Privacy Program

Assessments

- PIA & MARSE Self-Assessment / Privacy Attestation – July 2020
- Connector Entity Remote Reviews
  - Record Retention Policy and/or Schedule for Exchange's PII
  - Recommendations to Improve Privacy Notice
  - Recommendations to Inform Vendors of 1 Hour Breach Reporting Requirement
  - Inaccurate Logging of Reported Breach Incidents
- FY20 Maximus SOC 2 Type 2 Audit Report – Sep 2020
- Developed Maximus Remote Review

DUAs

- Collaborated in Drafting MHCC & UMBC DUAs
- Focus on Intergovernmental Agency DUA updates

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FY21 YTD Privacy Program

JIRA's

- MH – 32132; CM Capture Workers Accessing CP via WP – 03/26/21
- MH – 46628; WP Failure to Capture Work Item Actions – 03/26/21
- MH – 45424; Preserving Old Auth. Rep Information – 02/26/21

Policies

- Updated Privacy Notice to Reflect Research
- Collaborated in Policy Review & Update
  - Incident Handling & Breach Notification
  - Authorized Use & Disclosure of PII

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Policy Reviews and Updates

➤ Background Check

➤ Fair Practices

➤ Consumer Discrimination Grievance

➤ Debarment

➤ Code of Conduct

➤ Consultant's Time Entry Approval Process

➤ Periodic Recertification of Access

➤ QHP Certification

➤ QHP Decertification

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Questions?

Thank you for your leadership.

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