MHBE Compliance Officer 4Q FY21 Report

to the

MHBE Board of Trustees
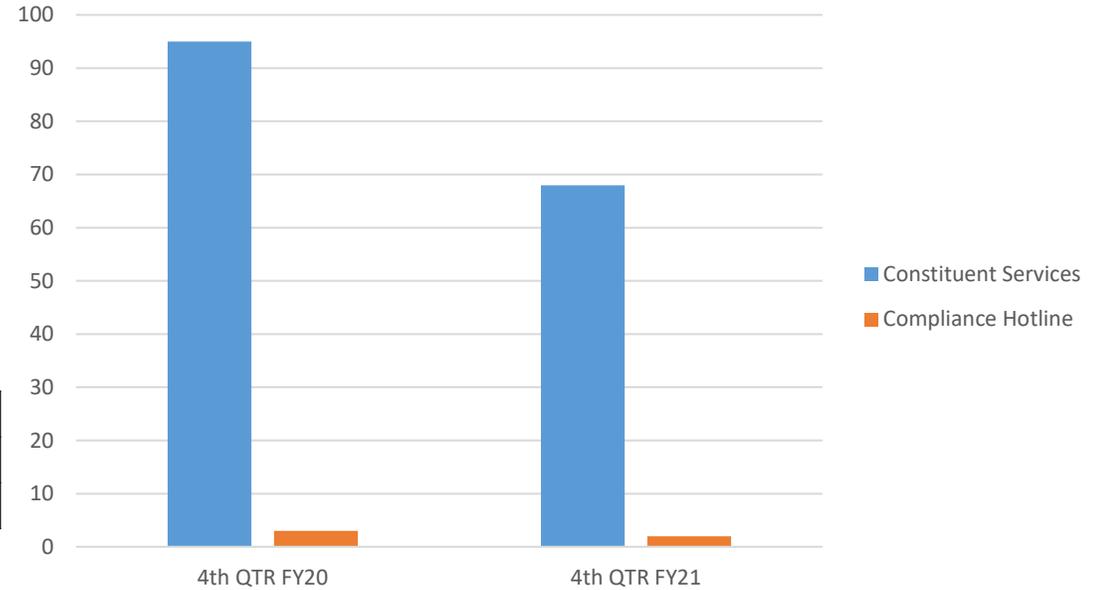
Presented by
Caterina Pañgilinan
July 19, 2021

4th QTR FY20 v May FY21 Compliance Hotline Calls

YTD FY20
281

Constituent Services	272
Compliance Hotline	3
Civil Rights Coordinator	6

YTD FY21
257

Constituent Services	248
Compliance Hotline	7
Civil Rights Coordinator	2

Legend: ■ Constituent Services ■ Compliance Hotline

FY21 YTD Fraud, Waste & Abuse Allegations

13 – Allegations
- ❖ **10 Not Founded**
- ❖ **3 Referred to MDH**

June 2021 OIG LEIE Sanctions Check

98 IDIQ Master Contractors – 0 exclusions

18 Vendors – 0 exclusions

4 Carriers – 0 exclusions

(CareFirst BlueChoice, Inc, CareFirst of Maryland, Inc., Group Hospitalization and Medical Services, Kaiser Foundation Health Plan of the Mid-Atlantic States)

MARYLAND HEALTH BENEFIT EXCHANGE

4Q FY21 Privacy Program

NEEAs/DUAs Statuses

- LABOR Beacon Phase I MOU / DUA ✓
- UMBC Universal PII Exchange DUA – ✓
- DoIT IT Services MOU & DUA – Submitted April 2
- CareFirst MCO NEEA – MDH Response Pending
- DHS DUA – Remains Open
- AgileBlue NEEA ✓
- UserWay NEEA ✓
- Akamai NEEA - Pend

Assessments

- Privacy Impact Assessment - Submitted June 30
- Privacy Self-Attestation based on MARS-E - Submitted June 30
- Remote Review of Connector Entities - Completed June 30
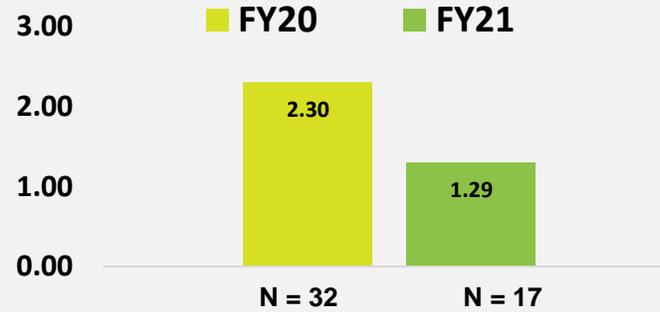
Policies & Procedures

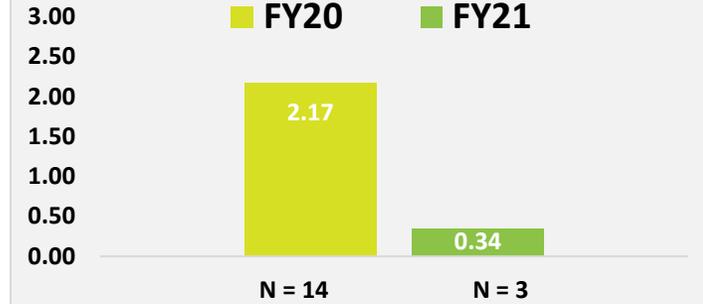- 02.03.04 Privacy Program
- 04.04.02 PII Reconciliation

MARYLAND HEALTH BENEFIT EXCHANGE

4Q FY21 Privacy Stats

Rate of Non-Producer Incidents Per 10,000 Enrollments

	Apr FY19	May FY19	Jun FY19	Apr FY20	May FY20	Jun FY20	Apr FY21	May FY21	Jun FY21
Value	0.93	1.04	1.29	1.46	1.52	1.49	0.71	0.84	0.56

44% Decrease in Rate of Misloads Per 10,000 VCL Uploads

■ FY20 ■ FY21

FY20 (N = 32)	FY21 (N = 17)
2.30	1.29

84% Decrease in Producer Rate Per 1,000 Producer Enrollments

■ FY20 ■ FY21

FY20 (N = 14)	FY21 (N = 3)
2.17	0.34

Rate of CSR Errors Per 100,000 Calls

	Apr FY19	May FY19	Jun FY19	Apr FY20	May FY20	Jun FY20	Apr FY21	May FY21	Jun FY21
Value	1.14	1.18	1.29	1.38	0.00	1.23	1.51	1.66	0.00

Incident Mitigation

	FY20	FY21
Rate of Misloads requiring Notice to Consumer (per 10 Misloads)	1.25	0.00
Rate of Parties Affected (per 10,000 Enrollments)	9.74	1.35

■ FY20 ■ FY21

MARYLAND
HEALTH BENEFIT
EXCHANGE
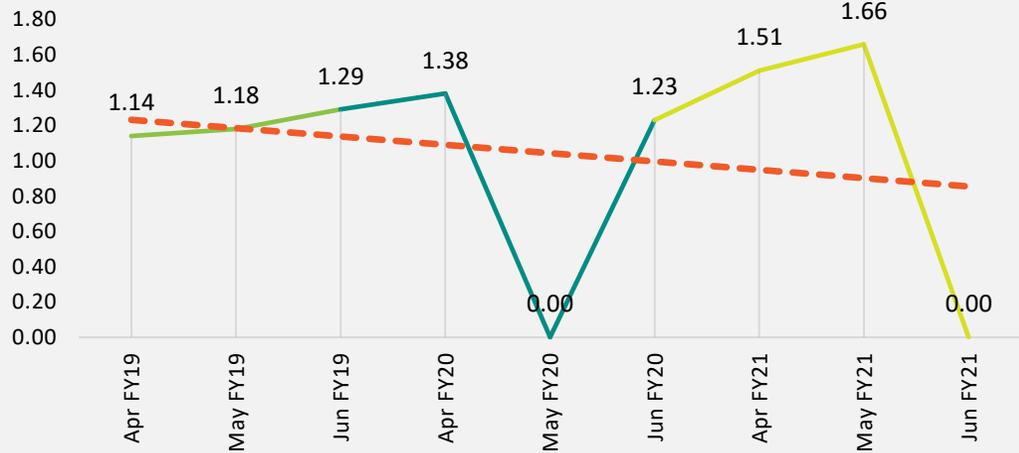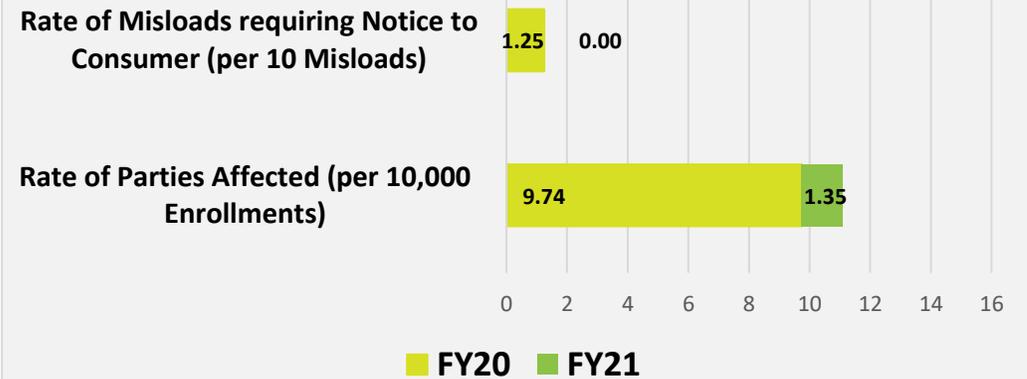
Q4 FY21 Audit Status Report

Total Audit Findings

(0) Recruitment and Evaluation FY19

(0) Independent External Audit Finance FY20

(0) Independent External Audit Programmatic PY20

(0) Internal Revenue Service Triennial (Management, Technical and Operations)

(2) OLA Triennial Fiscal Compliance Audit

(1) OLA Triennial Information Systems Audit

Internal Assessments

(Submitted) Privacy Impact Assessment FY21

(Submitted) Minimum Acceptable Risk-Standards State-based Exchange FY21

(Submitted) SMART PY20

- Notices to Employers
- *Employer Sponsored Coverage Verification*
- *Failure to Reconcile (FTR) Flags – Repeat*

CMS

Exchange Improper Payment Measurement Pilot

(01/22) MDH PERM Audit RY23

Pending State Audits

Single State Audit

DBM Recruitment Audit

MARYLAND
HEALTHBENEFIT
EXCHANGE

MHBE FY 2022 External Audit Timeline

MHBE Internal Assessment and External Audit Timeline – Fiscal Year 2022															
Audit Activity	Start Date	End Date	Status	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun
EIPM *Pilot*	1-Jul	30-Jun	In Progress												
MDH PERM AUDIT RY23	1-Jul	30-Jun	In Progress												
Single State Audit	15-Jul	31-Oct	Pending												
DBM-RED Audit	1-Aug	31-Dec	Pending												
Independent External Financial Audit - FY 2021	1-Jan	28-Feb	Not Started												
Independent External Programmatic Audit - PY 2021	1-Mar	31-May	Not Started												
System Security Report (SSR)	1-Mar	31-May	Not Started												
SMART Self-Attestation for PY 2021	15-Mar	31-May	Not Started												
Privacy Impact Assessment (PIA)	1-Apr	30-Jun	Not Started												
Information Security Risk Assessment (ISRA)	1-Apr	30-Jun	Not Started												
MARS-E Review/Attestation	1-Apr	30-Jun	Not Started												

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OLA Triennial Findings – Status Update

Finding 1 – Use other income and electronic data sources to verify income
- ❖ MDH internal assessment to obtain income at point of application. Projected: June 2022
- ❖ Receive BEACON Unemployment Compensation data. Projected: ~September 2021

Finding 2 – Independently review eligibility overrides
- ❖ Supervisory review and revision of override applications and communication back to staff
   Iimplemented: July 2021
- ❖ Override Review Policy. Delayed: August 2021

Finding 3 – Use Multifactor Authentication and filter traffic for certain remote third parties. Completed.

<u>Other Findings Requiring Agency Action</u>
- ❖ Enhance bid security. Testing Implemented: June 2021
- ❖ Perform impact analysis of data loss prevention application at the column or database level.
   Projected: August 31, 2021
   If indicated, Implement: June 30, 2022

FY20-FY21 Internal Monitoring Status

	FY20 Recommend-ations	FY20 Mitigate Risk - Cleared	FY20 - Risk - Accepted	FY20 Mitigate Risk - Repeated	FY21 Recommend-ations	FY21 Risk-Accepted	FY21 Total Corrective Actions
Operations - Producer Operations	0	N/A	N/A	N/A	4	1	3
Operations - Appeals & Grievances	6	4	N/A	2	0	N/A	2
Operations - Application Counselor Programs	4	1	N/A	3	0	N/A	3
IT - Project Management Office	12	4	8	N/A	1	N/A	1
Plan Management	7	5	N/A	2	1	N/A	3
Marketing	4	1	N/A	3	0	N/A	3
Employment, Benefits & Workplace	0	N/A	N/A	N/A	2	N/A	2
TOTAL	**33**	**15**	**8**	**10**	**8**	**1**	**17**

Q4 FY2021 Initiatives

Completed:

❖ 6 Connector Entity Reviews

❖ Transitioned Privacy Incident Reporting, Investigation and Corrective Action Plans to CEs

❖ Reinforced Vendor Sanctions and Exclusions Checks

❖ Obtained E-verify for Master Contractors with Resources Authorized Access to Federal Tax Information

❖ Internal Stakeholder IT Security, Privacy and Compliance Training Completed

Initiated/On-going:

❖ Maximus SOC 2 Type 2 Audit Under Review

❖ IT Security Policy and Procedures Update Project FY22

❖ FY21 Compliance Annual Assessment Presentation to Board September 2021

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Questions?

Thank you for your leadership.

MHBE Compliance Hotline 410-547-6862