

MHBE Compliance Officer FY22 Q1 Report

to the

MHBE Board of Trustees

Presented by
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November 15, 2021

Q1FY21 v FY22 Compliance Hotline Calls



Compliance Hotline	1
Civil Rights Coordinator	0

Compliance Hotline	2
Civil Rights Coordinator	0

Q1 FY22 YTD Fraud, Waste & Abuse Allegations

2 Allegations
2 – Not Founded

September 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)

MHBE FY22 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 <i>Pilot</i>	1-Jul	30-Jun	In Progress	[Solid Blue Bar]											
MDH PERM AUDIT RY23	1-Jul	30-Jun	In Progress	[Hatched Blue Bar]											
Single State Audit	1-Sep	30-Nov	In Progress			[Solid Blue Bar]									
DBM-RED Audit	15-Oct	30-Nov	In Progress				[Solid Blue Bar]								
Independent External Financial Audit - FY 2021	1-Jan	28-Feb	Not Started							[Solid Yellow Bar]					
Independent External Programmatic Audit - PY 2021	1-Mar	31-May	Not Started									[Solid Yellow Bar]			
System Security Report (SSR)	1-Mar	31-May	Not Started									[Solid Yellow Bar]			
SMART Self-Attestation for PY 2021	15-Mar	31-May	Not Started									[Solid Yellow Bar]			
Privacy Impact Assessment (PIA)	1-Apr	30-Jun	Not Started									[Solid Yellow Bar]			
MARS-E Review/Attestation	1-Apr	30-Jun	Not Started									[Solid Yellow Bar]			

Q1 FY22 Audit Status Report

Total Audit Findings

- (2) OLA Triennial Fiscal Compliance Audit
- (1) OLA Triennial Information Systems Audit
- (1) SMART PY20**

CMS

- Exchange Improper Payment Measurement Pilot
- MDH Payment Error Rate Measurement (PERM) Audit RY23**
- Medicaid Eligibility Quality Control (MEQC)
- MDH Corrective Action Plan**

Internal Assessments

- (Approved) Privacy Impact Assessment FY21
- (Approved) Minimum Acceptable Risk-Standards State-based Exchange FY21

Ongoing State Audits

- Single State Audit
- Department of Budget and Management- Recruitment Audit (**October 15, 2021**)

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. Design - Unearned Income (alimony, rental, investments) to be added to application. **MH-54847, Release 41.0 - 5/27/2022**
- ✓ Receive BEACON Unemployment Compensation data. **Implemented 10/18/2021**

Finding 2 – Independently review eligibility overrides

- ✓ Supervisory review and revision of override applications and communication back to staff
Implemented: July 2021
- ❖ Override Review Policy. **November 30, 2021**

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

Other Findings Requiring Agency Action

- ✓ Enhance bid security. Testing Implemented: June 2021
- ✓ Perform impact analysis of data loss prevention application at the column or database level.
Completed: August 31, 2021, No further action Recommended.

Q1 FY22 Status of FY21 Internal Review Recommendations

	FY21 Recommendations	FY21 Accept Risk	FY21 Mitigate – Late	FY21 Mitigate – On Schedule	FY21 Mitigate – Complete
Operations - Producer Operations	4	1	0	2	1
Operations - Appeals & Grievances	2	0	0	0	2
Operations - Connector Entity Program	3	0	0	1	2
Operations - Application Counselor Programs	3	0	0	1	2
IT - Project Management Office	3	0	0	0	3
Plan Management	3	0	0	2	1
Marketing	3	0	0	0	3
PMO / HR / IT Security - FTI Access	5	0	1	1	3
Employment, Benefits & Workplace	2	0	0	0	2
TOTAL	28	1	1	7	19

Compliance Areas of Focus

- Monitor Third-Party Compliance with Debarment and Sanctions Screenings
- Implement Compliance and Ethics Survey
- Privacy Incident Management Process
- Privacy Incident Management Application
- Data sharing – MDT Corrective Action
- Improve Operational and Administrative Policies and Procedures
- Collaborate with IT Security and Project Management Office on IT Policies and Procedures
- Align Departmental Standards and Publications with Regulations

Q1 FY22 Privacy Program

NEEAs/DUAs Statuses

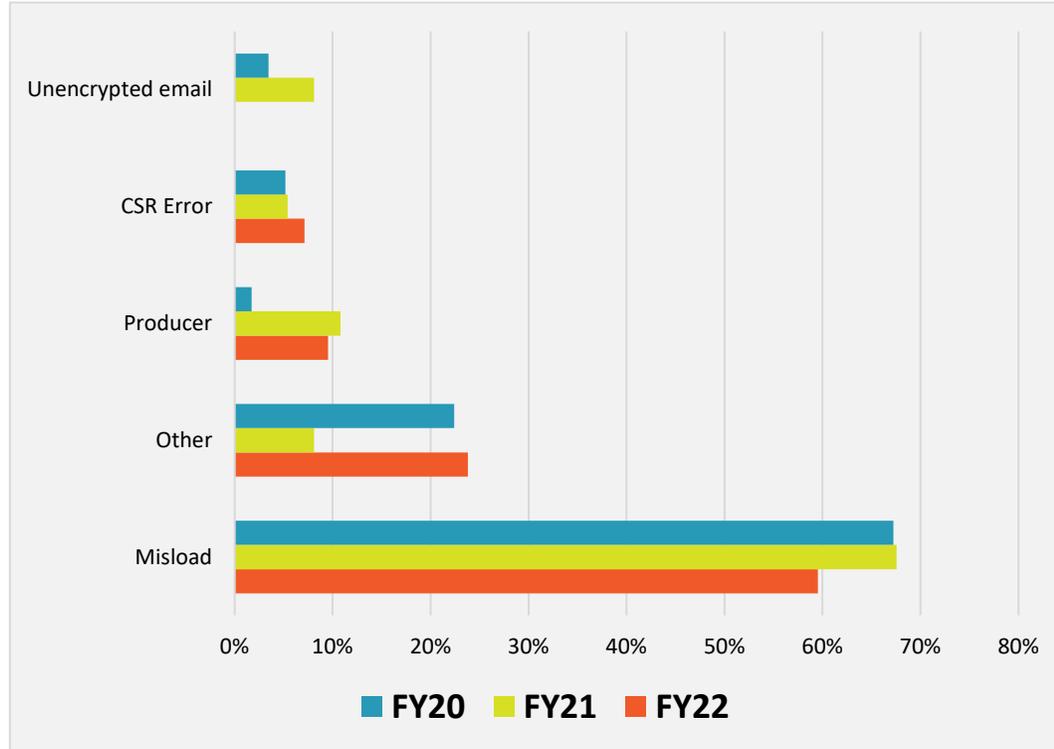
- LABOR Beacon Phase I & II MOU / DUA ✓
- UMBC Universal PII Exchange DUA ✓
- DoIT IT Services MOU & DUA – DoIT Approval Pending as of 04/02
- CareFirst MCO NEEA – MDH Response Pending
- DHS DUA – Remains Open
- Booze Allen Hamilton PERM NEEA ✓
- Splunk NEEA
- Akamai NEEA
- Granicus NEEA

Assessments

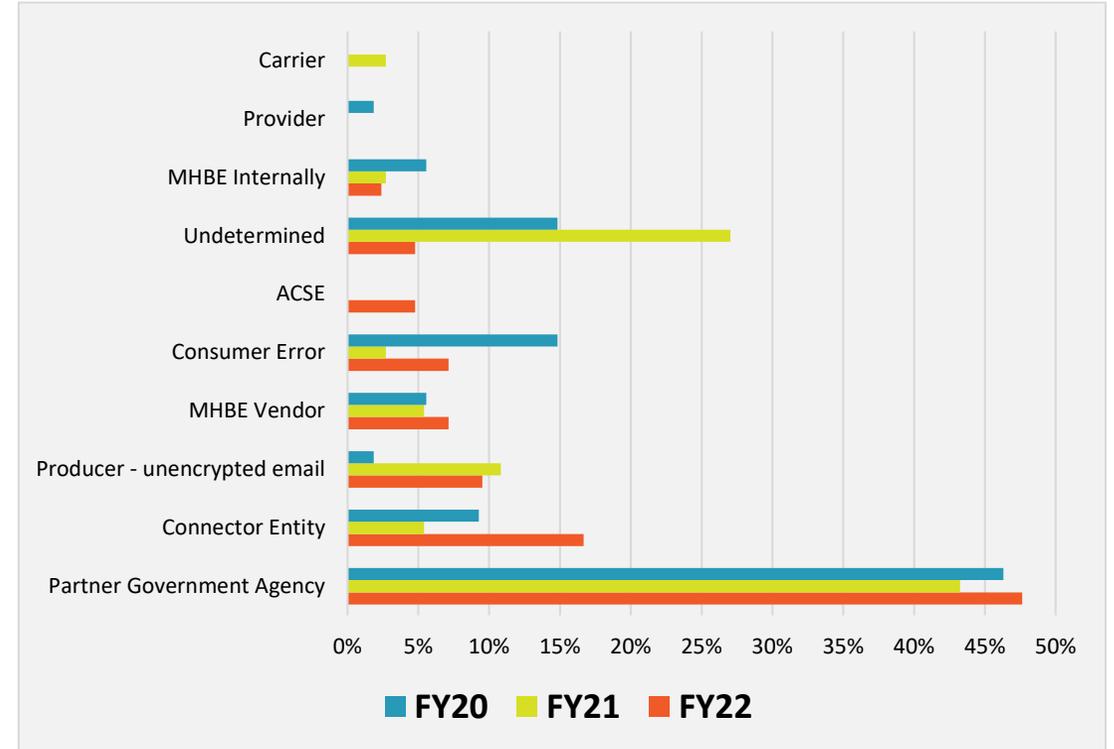
- Privacy Impact Assessment – All Green
- Privacy Self-Attestation based on MARS-E Submitted June 30
- Remote Review of Connector Entities Completed June 30
- Maximus Response to FY21 MARS-E Remote Review

Q1 FY22 PRIVACY STATS

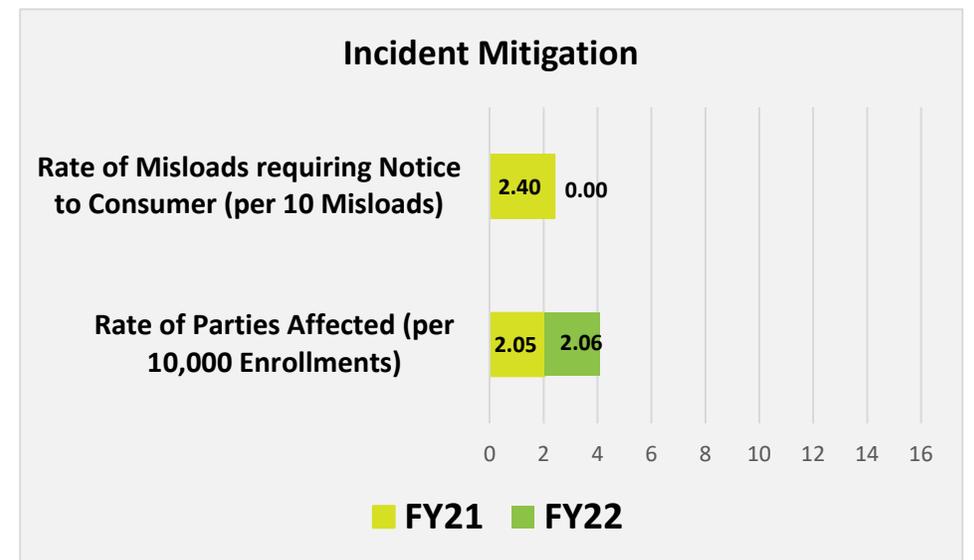
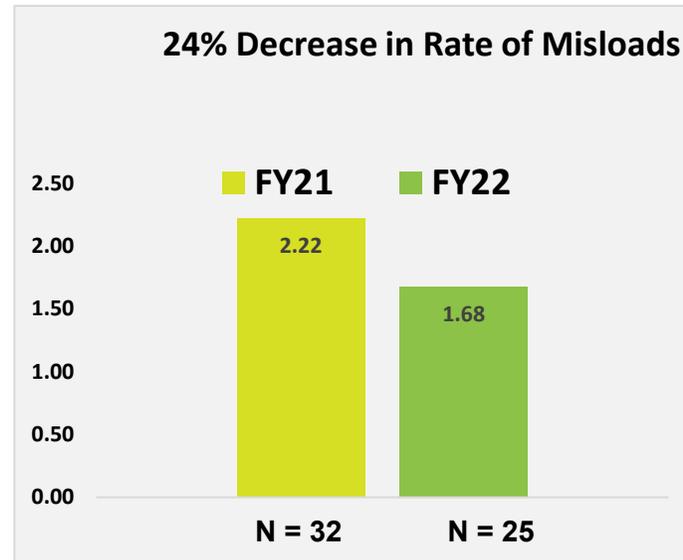
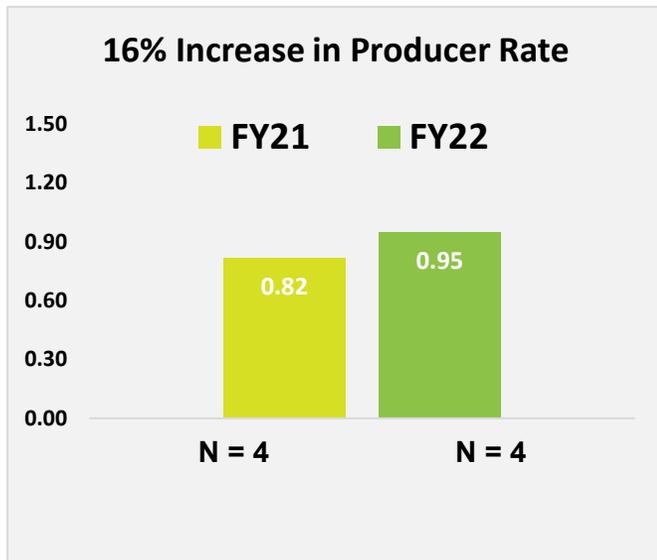
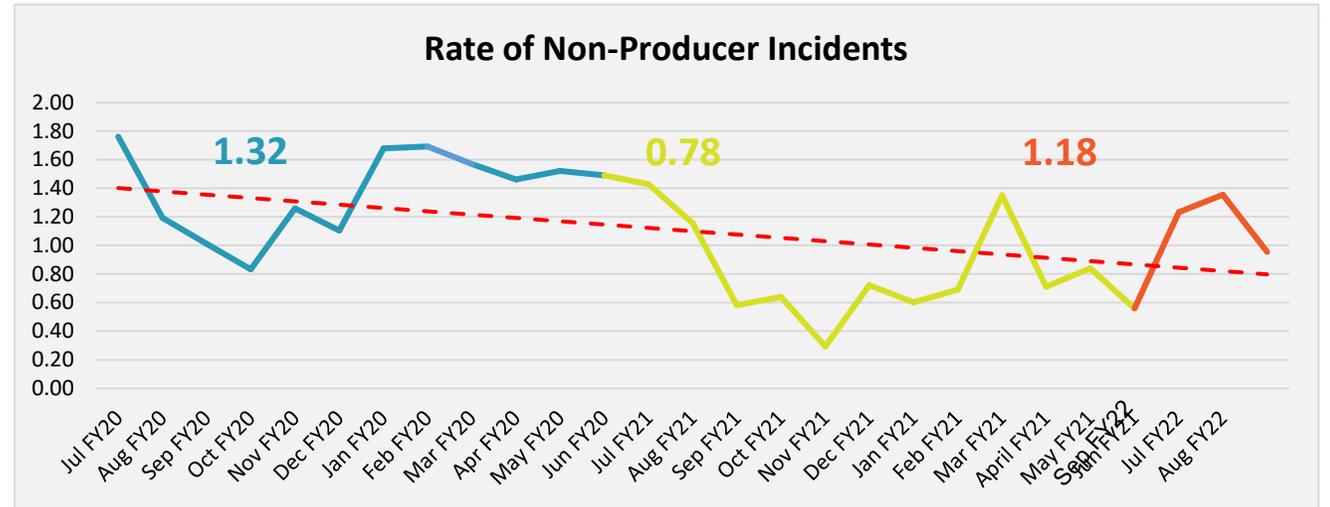
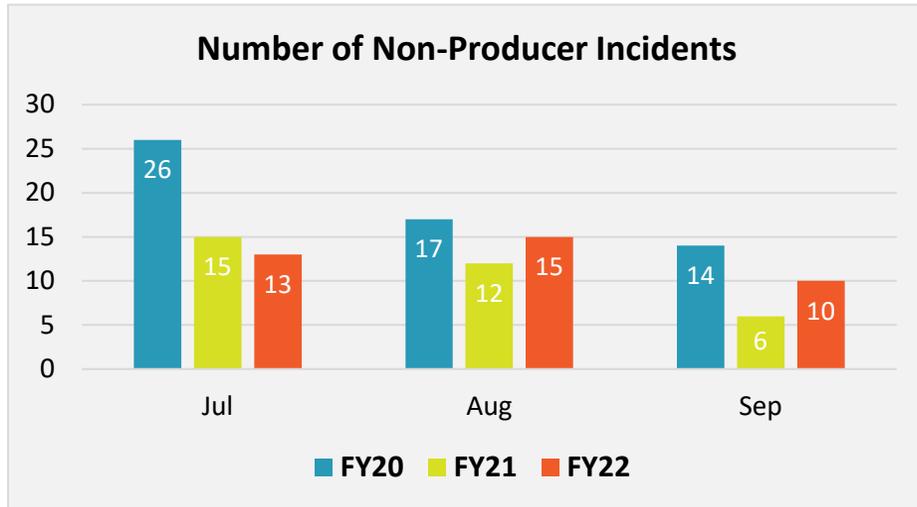
Types of Incidents



Responsible Entities



Q1 FY22 Privacy Stats





Questions?

Thank you for your leadership.

MHBE Compliance Hotline 410-547-6862