



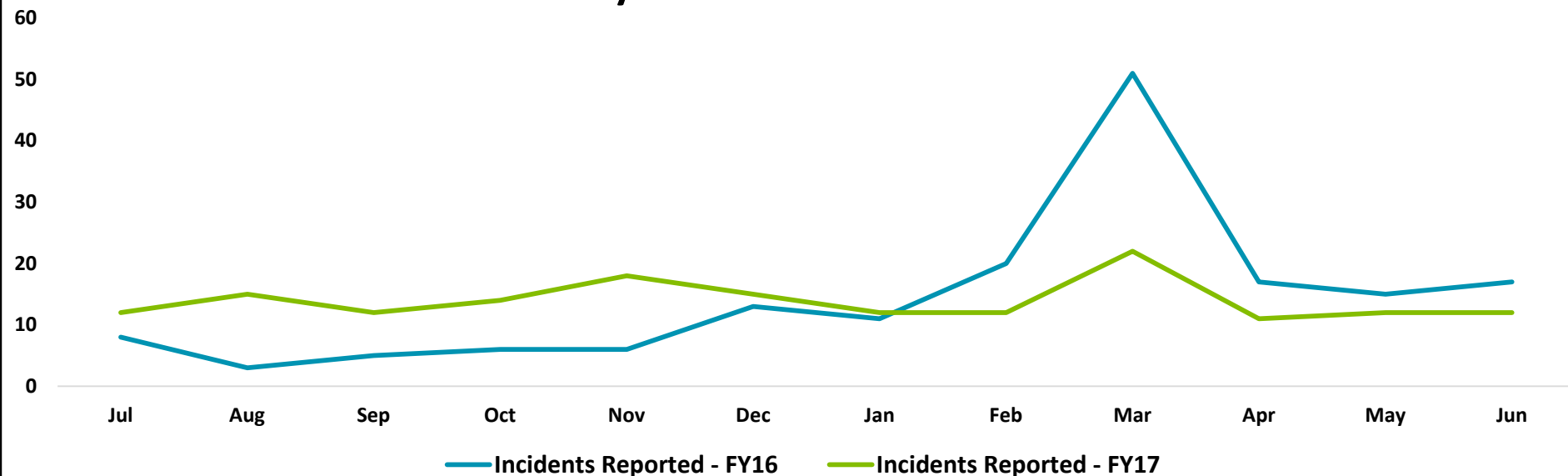
FY 2017 ANNUAL COMPLIANCE REPORT PRESENTATION

TO
MHBE BOARD OF TRUSTEES

OCTOBER 16, 2017

A service of Maryland Health Benefit Exchange

Privacy Incidents - FY16 vs. FY17



PRIVACY INCIDENTS FY2017 (7/1/16 – 6/30/17)

- 167 Reported Incidents
- 84 Breach notifications
- 3% decrease in overall incidents reported
FY16 – 172 FY17 – 167
- 4% increase in rate of misloaded documents
1.58 v. 1.65 per 10,000 loads (97 misloads in 586k uploads)
- 9% increase in rate of CSR phone incidents
2.54 v 2.81 per 100,000 calls (28 errors in ~1 million calls)
- 58% Incidents Reported were misloaded VCL documents

MITIGATION STRATEGIES

- ✓ Reconstituted Incident Review Team
 - Cross-functional analysis
 - Expedited Mitigation
- ✓ System Enhancements
 - Ability to audit records at user level
 - Addition of screen prompts for Workers to validate identity of consumer against document to be uploaded
 - Ability for MDH workers to upload directly into system
- ✓ Improved Visibility & Accountability
- ✓ Implemented Corrective Action Plans (CAPs) and Plan of Action and Milestones (POA&Ms)

OFFICE OF LEGISLATIVE AUDIT (OLA) FINANCE PERFORMANCE
Triennial Survey 2014

- ❖ Procurement Policy Adherence
- ❖ Consultant Timekeeping
- ❖ Federal Fund Reimbursement Requests
- ❖ Connector Entity Expenditures and Invoice Controls
- ❖ Inventory Control and Reconciliation
- ❖ Open Meetings Act Compliance
- ❖ Personally Identifiable and Federal Tax Information Inventory
- ❖ Role-based Access Controls
- ❖ Service Organization Control (SOC) 2, Type 2 Audits for Vendors
- ❖ Intrusion Detection Prevention System and Worker Portal Access

State-based Market Annual Reporting Tool (SMART) for Plan Year 2015

- ❖ Incarceration Verification Process
- ❖ Eligibility and Enrollment in Employer Sponsored Coverage Verification
- ❖ Program Level Reporting Data Submission to CMS
- ❖ Section 1557 of Affordable Care Act Compliance – Nondiscrimination
- ❖ Comprehensive Annual Financial Report (CAFR) and Financial Document Submission
- ❖ Independent Audit PY 2015 Status Updates to CClO

Independent External Finance and Programmatic Audit for Plan Year 2016

- ❖ Segregation of Journal Entry Duties
- ❖ Incarceration Verification Process
- ❖ Improve Internal Audit Process – QHP enrollment

- ✦ Updated Compliance Plan and Related Procedures
- ✦ Code of Conduct
- ✦ Maintained Anonymous Reporting Hotline
- ✦ Investigated 9 Compliance Hotline Complaints
- ✦ Collaborated in CCIIO Compliance Officer Meetings
- ✦ Increased Oversight and Monitoring
- ✦ Independent External Finance and Programmatic Audit
- ✦ Completed Government Accountability Office Audit
- ✦ Revised 2017 Annual Compliance Training and Attestation