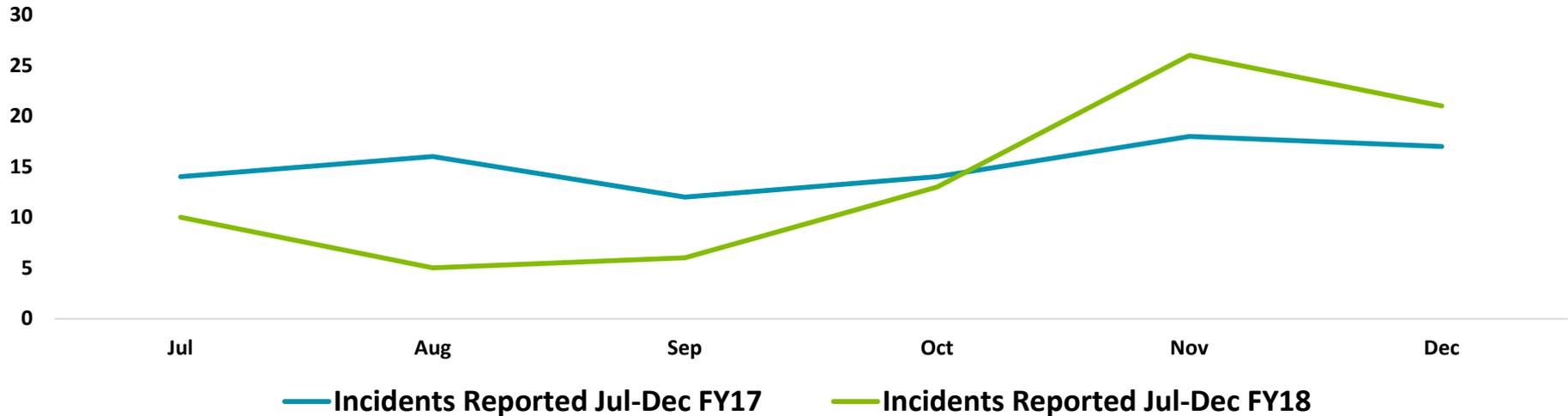




MHBE COMPLIANCE REPORT
to
MHBE BOARD OF TRUSTEES

February 20, 2018

Privacy Incidents to Q2 FY18



PRIVACY INCIDENTS FYTD 2018

- 81 Reported incidents; 30 Breach notifications
- 12% Decrease in reported incidents - from 91 to 81
- 14% Increase of Misloaded documents
1.53 to 1.78 per 10,000 (**56 in 315,000 uploads**)
- Misloaded VCLs account for 70% of Incidents
- 55% Decrease in rate of CSR phone incidents
3.07 to 1.37 per 100,000 calls (**8 in 583,000 calls**)
- 52% Reduction in avg. days from Misload to report – 42 to 20
- 67% Misloads fully resolved within 36 hours of notification, up from 59% in FY17

MITIGATION STRATEGIES

- ✓ Implemented Salesforce Customer Record Management System modules for Call Center and for MDH
- ✓ Collaborated with Call Center Privacy team to align processes
- ✓ Revised Internal and External stakeholders' Privacy training and attestation
- ✓ Developed a more robust IT Security training program
- ✓ Consistently met internally established notification requirements
- ✓ Enhanced Data Use Agreements inclusion of ACA Privacy and HIPAA requirements

MHBE EXTERNAL AUDIT TIMELINE	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY & AUGUST	SEPT →	DEC
OLA Fiscal Compliance Audit	6/5/17 to est 2/28/18								
OLA IT Security Audit		1/8/18 to 3/30/18							
Ind. Ext. Financial Onsite Audit and Report		01/23/18 to 3/30/18							
System Security Report			3/1/18 to 05/30/18						
PY17 SMART		2/01/18 to 5/30/18							
Ind. Ext. Programmatic Onsite Audit and Report				3/30/18 to 5/30/18					
PY19 Privacy Impact Assessment Report		2/1/18 to 6/27/18							
RED Audit								9/1/18 to 12/31/18	

OFFICE OF LEGISLATIVE AUDIT (OLA) FINANCE PERFORMANCE

- ❖ Procurement
- ❖ Purchases and Disbursements
- ❖ Medicaid Eligibility Determinations

State-based Market Annual Reporting Tool (SMART) for Plan Year 2016

- ❖ Verification of Employer Sponsored Coverage using an approved electronic data source
- ❖ Qualified Health Plan coverage for applicants

Independent External Finance and Programmatic Audit for Plan Year 2016

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