

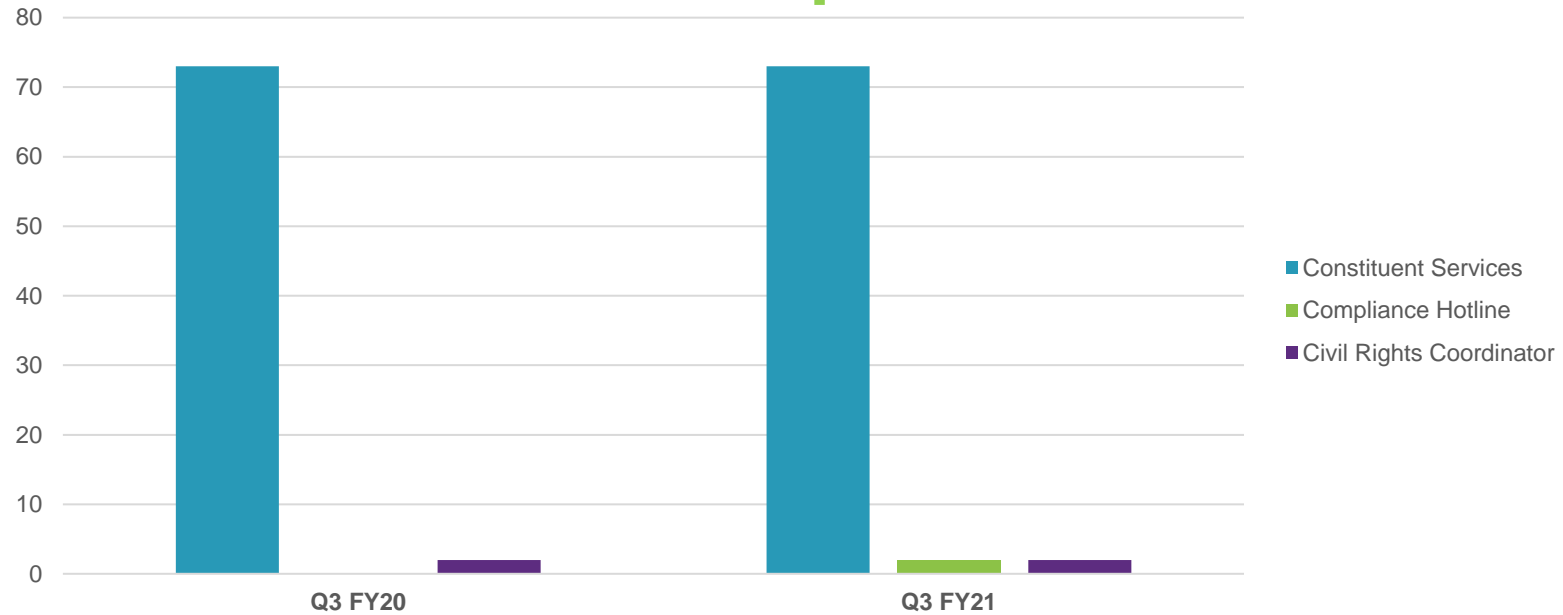
MHBE Compliance Officer 3Q FY21 Report

to the

MHBE Board of Trustees

Presented by
Caterina Pañgilinan
April 19, 2021

3rd QTR FY21 Compliance Hotline



	3rd QTR FY20	3rd QTR FY21
Constituent Services	73	73
Compliance Hotline	0	2
Civil Rights Coordinator	2	2

YTD Q3 FY21 Fraud, Waste & Abuse Allegations

- 11 - Allegations**
- ❖ 9 Not Founded
- ❖ 2 Referred to MDH

March OIG LEIE Sanctions Checks

- ❖ 99 IDIQ Master Contractors – 0 exclusions
- ❖ 18 Vendors – 0 exclusions

MHBE EXTERNAL AUDIT TIMELINE – Calendar Year 2021

Activity	Start Date	End Date	Status	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec		
EIPM <i>Pilot</i>	15-Jul	31-Dec	In Progress														
IRS 1075 Safeguards Triennial CAP	1-Jan	31-May	In Progress														
OLA ISA Discussion Note Responses	5-Feb	8-Mar	In Progress														
Independent External Audit for PY 2020	1-Mar	31-May	In Progress														
System Security Report (SSR)	1-Mar	31-May	In Progress														
SMART Self-Attestation	15-Mar	31-May	Pending														
Privacy Impact Assessment (PIA)	1-Apr	30-Jun	Pending														
MARS-E Review	1-Apr	30-Jun	Pending														
Single State Audit	15-Jul	31-Oct	Pending														
DBM-RED Audit	1-Aug	31-Dec	Pending														

Q3 FY21 Audit Status Report

Total Audit Findings

- (1) Independent External Audit Finance PY19
- (0) Recruitment and Evaluation FY19
- (0) Independent External Audit Programmatic PY19
- (0) Internal Revenue Service Triennial (Management, Technical and Operations)
- (2) OLA Triennial Fiscal Compliance Audit***
- (4) OLA Triennial Information Systems Audit***

Internal Assessments

- (Approved) Privacy Impact Assessment CY20
- (Approved) Minimum Acceptable Risk-Standards State-based Exchange CY20
- (1) SMART PY19
 - Employer Sponsored Coverage
 - Failure to Reconcile (FTR) Flags – Repeat

CMS

Exchange Improper Payment Measurement Pilot - Session 6

Current/Pending Audits

OLA Triennial Fiscal Compliance and IT Audit

**projected*

OLA Discussion Notes - Fiscal

DN 1 – Verify all applicant income using both Maryland Automated Benefits System (MABS) and Federal Tax Information (FTI) data

- ❖ Disagree with use of FTI.
- ❖ Use MABS Unemployment Compensation data. Projected: September 2021

DN 2 – Use available system reports to independently review overrides of applicant eligibility status

- ❖ Terminate supervisor override ability (Appeals & Constituent Services Mgr). Completed: February 2021
- ❖ Review users with override role to determine necessity for job function. Projected: TBD
- ❖ Supervisors to review overrides, revise, as necessary, and inform staff of results. Projected: July 2021

Other Findings Requiring Agency Action

- ❖ Enhance bid security by limiting and monitoring access to submitted bids. Projected: July 2021

OLA Discussion Notes – Information Security

DN 1 – Unnecessary network level access to numerous critical MHBE MD THINK network resources via a former VPN connection and by a terminated contractor.

- ❖ Site to Site tunnel and firewall rules terminated. Completed: 08.31.20

DN 2 - MHBE AWS production firewall log storage and alert settings configuration and review of critical event logs

- ❖ Current logs securely stored and retained for 3 months. Implemented: 08.20.20
- ❖ Infrastructure team reviews appliance configurations and system logs weekly. Implemented: 08.20.20

DN 3 - Limit HBX navigator, assistor, and case worker network level access via VPN connections

- ❖ Limit access and incorporate into quarterly firewall review and remediation process. Projected: 04.30.21

DN 4 – Employ multi-factor authentication for all remote access to MHBE network

- ❖ Enforce Multi-factor authentication. Implemented: 08.31.20

Other Findings Requiring Agency Action

- ❖ Perform impact analysis of data loss prevention application at the column or database level.
Projected: 08.31.21 If indicated: Implement: June 30, 2022

Q3 FY21 Internal Reviews - Completed

- ❖ Indefinite Delivery Indefinite Quantity (IDIQ) Procurement / Invoicing. Corrective Action: Improve documentation of Federal Funds Participation (FFP) rates for IDIQ resources – Timesheet. Completed. Memorandum. Pending.
- ❖ Appeals and Grievances - Corrective Action: Enhance managerial oversight of appeal cases to ensure consistent achievement of regulatory and policy timelines. Completed.
- ❖ Public Information Act - Corrective Action: Enhance management oversight of PIA requests to ensure timely, consistent implementation of regulatory, policy and procedure, and annual training requirements (repeats). Pending.
- ❖ Carrier and Plan Certification - Corrective Action: Update and Execute an MOU with MIA that clearly defines each agency's plan and carrier certification responsibilities. Pending.

Reviews in Progress:

- ✓ Producer Operations
- ✓ Application Counselor Program

Identified Risks and Mitigation Strategies

Q1 FY2021 Root Cause Analyses:

- ❖ January 2020 MABS wage data file not updated
Pending
- ❖ Impersonator Role linked unassociated user files
Automated regression testing on Impersonator Role
Address workarounds that prompt the need for the Impersonator Role

Contract Monitoring Improvement Process:

- ❖ Training
- ❖ Accountability

Internal Controls – Q3 Policy Approvals and Pending

- ✓ 02.03.01 Authorization Use and Disclosure
- ✓ 02.02.04 Debarment
- ✓ 02.03.04 Privacy Plan
- ✓ 04.05.04 Periodic Recertification of Auditors Access
- ✓ 05.03.01 Fair Practices
- ✓ 07.03.01 Maryland Public Information Act
- ✓ NEW
- ✓ 03.03.12 Novation
- ✓ 04.02.04 Consultant Time Entry and Approval

- 02.01.01 Compliance and Ethics Plan
- 02.03.02 Incident Handling
- 03.02.02 Subaward Recipient Requirements
- 04.04.02 Reconciliation of PII with Non-Exchange Entities
- 05.03.03 Recruitment
- 06.02.03 Annual Eligibility Redetermination for QHP Renewals
- 08.06.02 Suspension of Producer Authorization
- NEW
- 04.05.07 Financial Management Information System Security

FY21 3Q Privacy Program

NEEAs/DUAs Statuses

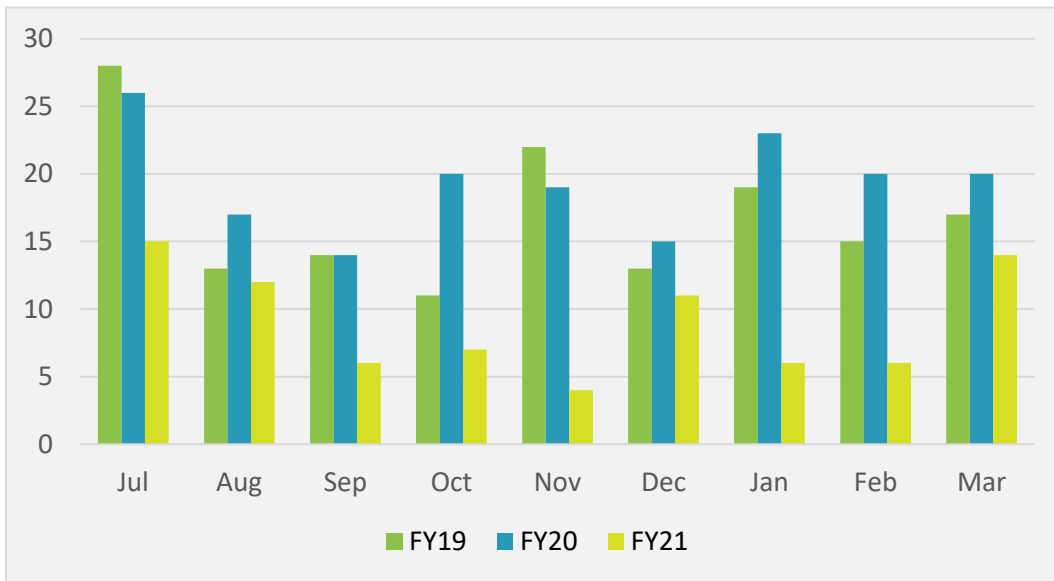
- MIA Standalone DUA ✓
- UMBC Universal PII Exchange DUA – Internal Review Complete as of 03/26
- LABOR Beacon Phase I MOU / DUA – LABOR Execution Pending
- DoIT IT Services MOU & DUA – DoIT Approval Pending
- CareFirst MCO NEEA – MDH AAG Response Pending
- DHS DUA – Remains Open

Policies & Reviews

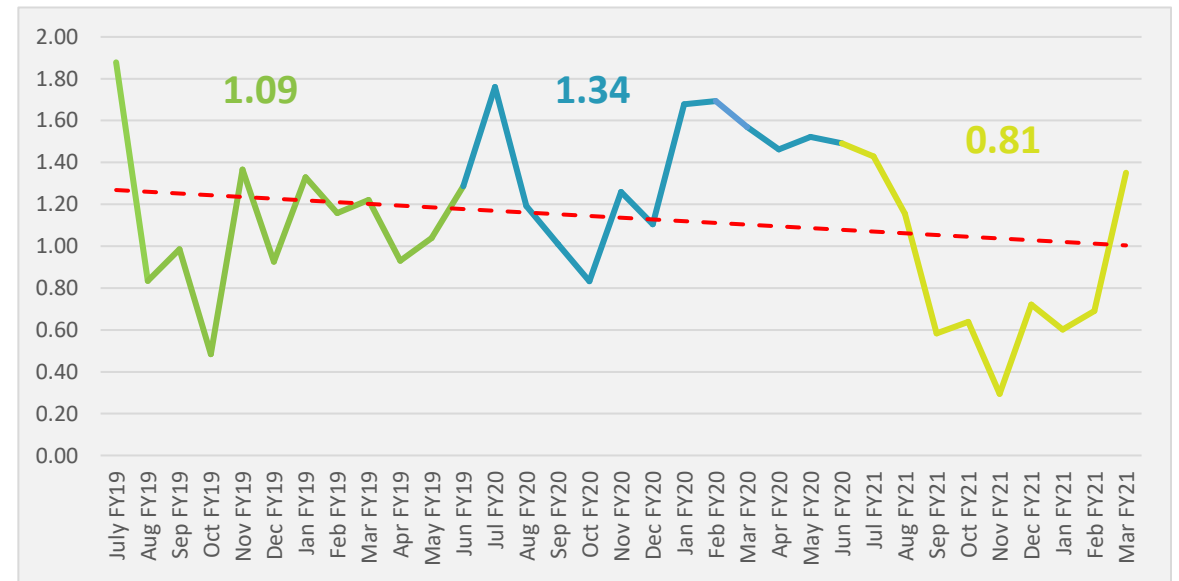
- 02.03.01 Authorized Use and Disclosure ✓
- 03.03.12 Novation ✓
- Maximus' Response to Soc 2 Type 2 Audit & Privacy Review

Non-Producer Privacy Incidents – Year Over Year to March

Number of Incidents

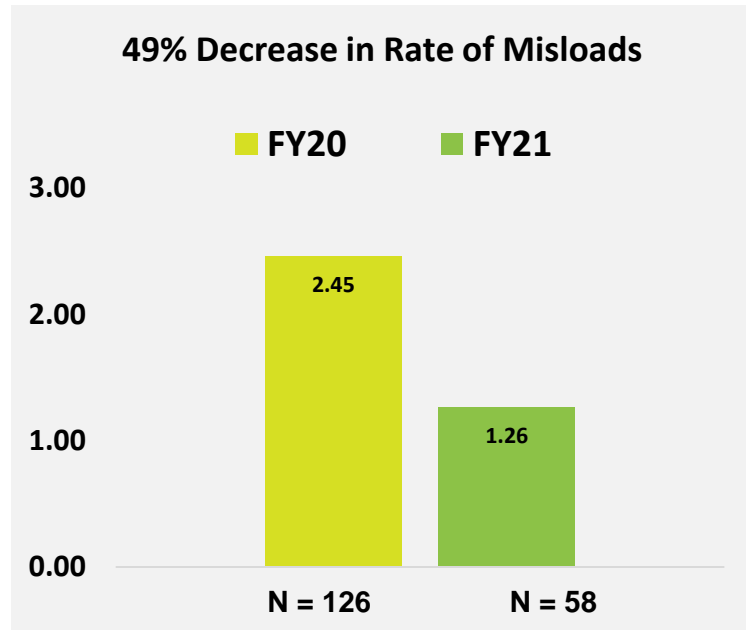


Rate of Incidents Per 10,000 Enrollments



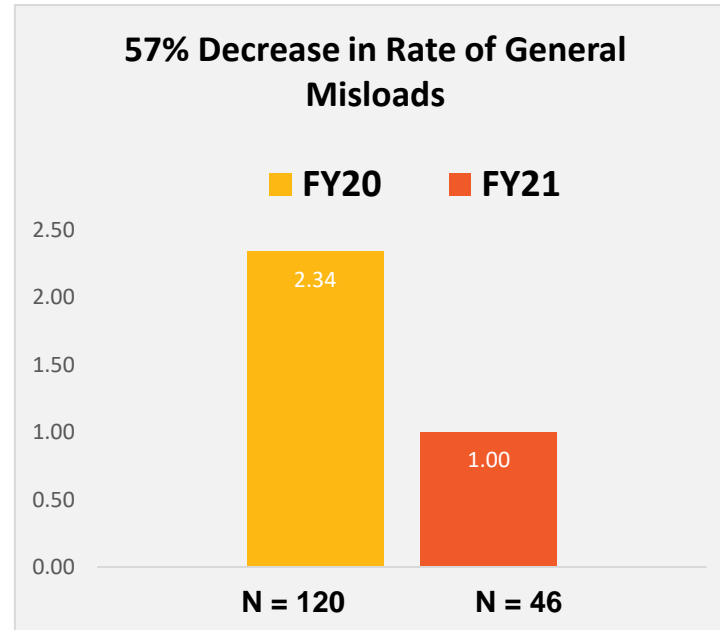
Rate of Misloads – Year Over Year to March

Total Misloads



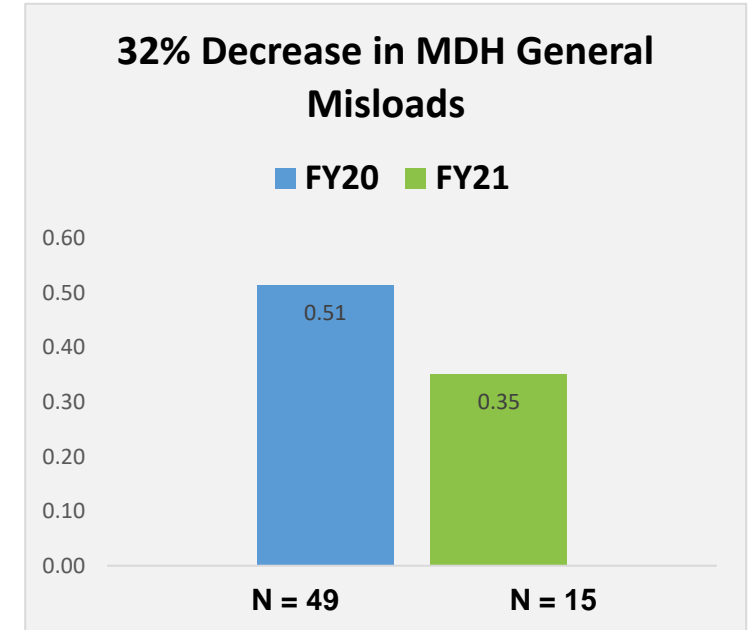
Per 10,000 VCL Uploads

General Misloads



Per 10,000 VCL Uploads

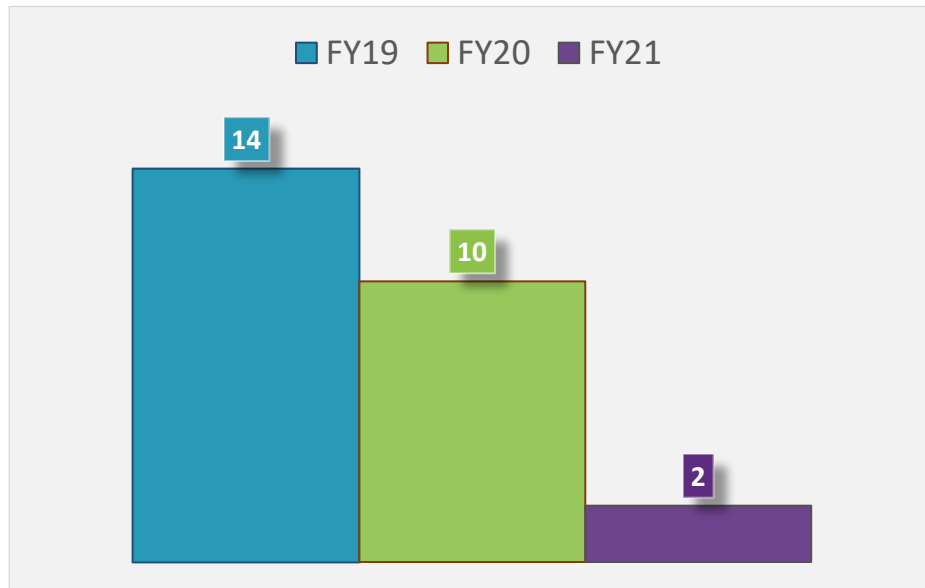
MDH General Misloads



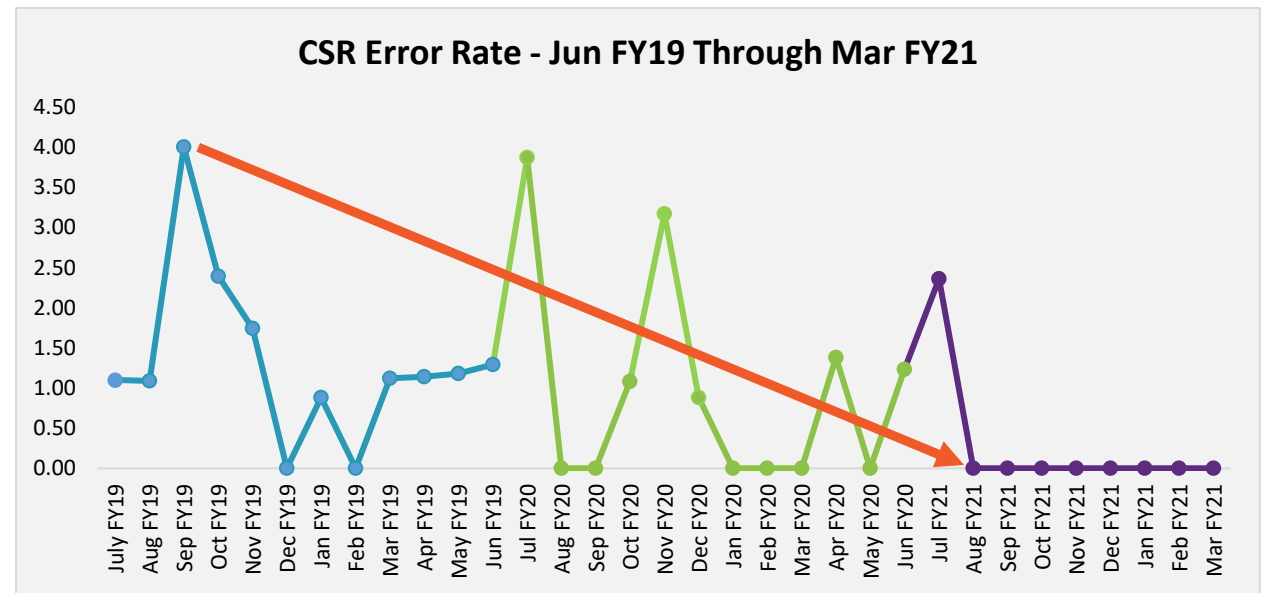
Per 1,000 MDH Uploads

CSR Error Rate – Year Over Year to March

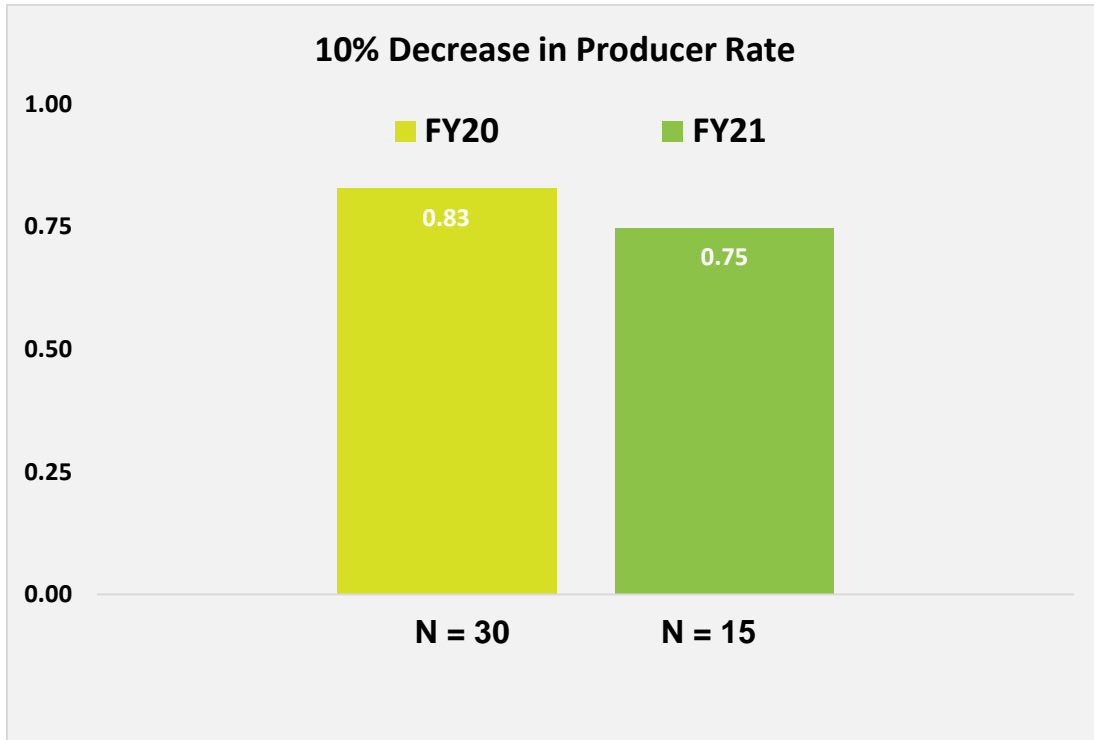
Number of CSR Errors



Rate of CSR Errors Per 100,000 Calls

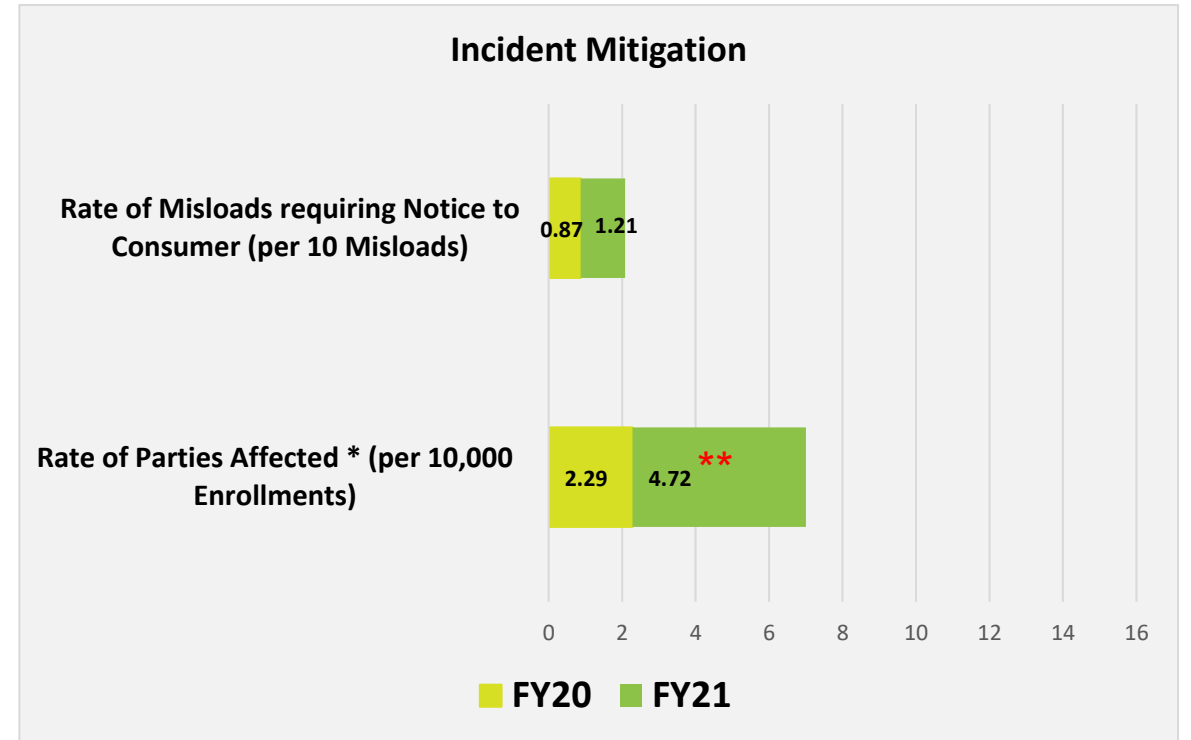


Rate of Producer Incidents



Per 1,000 Producer Enrollments

YTD Incident Mitigation



* System Security Error: 38 Consumers' PII Breached out of 166 accounts involved

** 307 Rate if MHBE & AHEC West Incidents Included

IT - 508 Compliance Action Plan Status Update

Widgets Evaluation:

- Evaluated and chose a 508 compliant “plug-in” product based upon functionality, features, usability, cost and security parameters

Security Assessment:

- Currently undergoing Security and Privacy impact assessment

Anticipated Procurement – May 2021

Anticipated Implementation:

- Consumer Portal - **Aug 2021**
- Marylandhealthconnection.gov and Marylandhbe.com -**TBD**



Questions?

Thank you for your leadership.