

MHBE Compliance Officer FY22 Q2 Report

to the

MHBE Board of Trustees

Presented by
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February 22, 2022



Chief Compliance Officer Update

- 1 Procurement and Non-Exchange Entity Process Improvement Team
- 2 Policy and Procedure Revisions
- 3 Complete Compliance Program Assessment: Prioritize and Implement Corrective Action Plan
- 4 508 Compliance
- 5 Research Enterprise Risk Management Best Practice Modules

FY22 PRIVACY OVERVIEW

DUAs / NEEAs

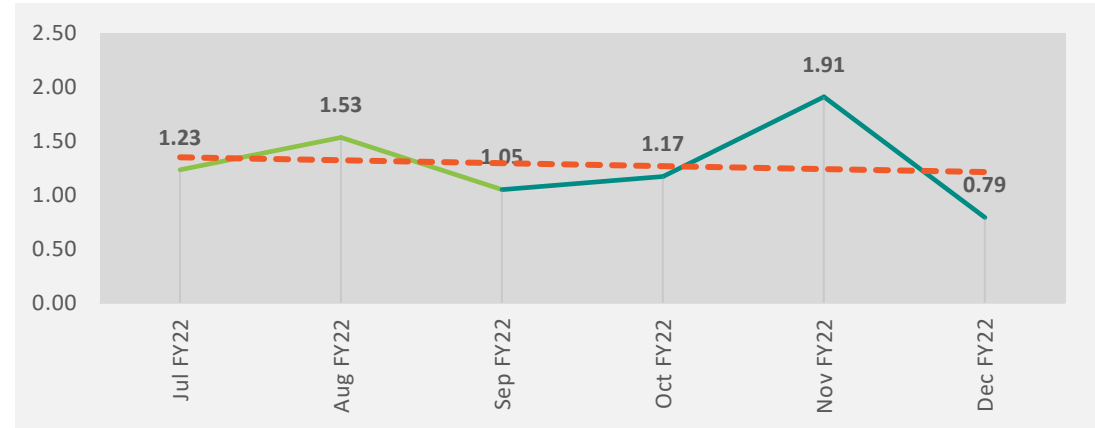
Government Agencies

LABOR Beacon Phase I & II MOU / DUA
 UMBC Universal PII Exchange DUA
 Maryland Health Care Commission DUA

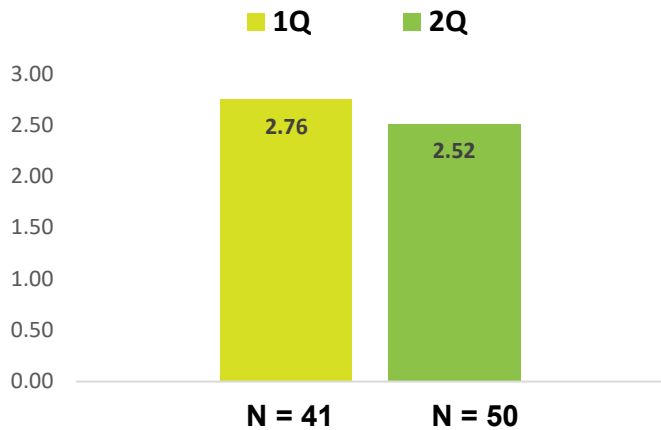
Vendors

Booze Allen Hamilton PERM NEEA

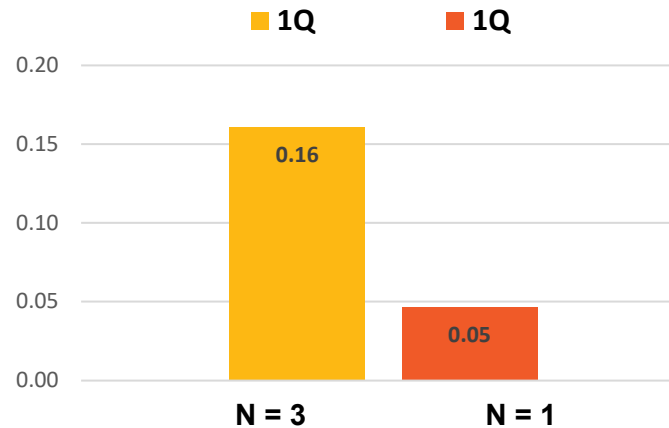
1% Increase in Rate of Incidents



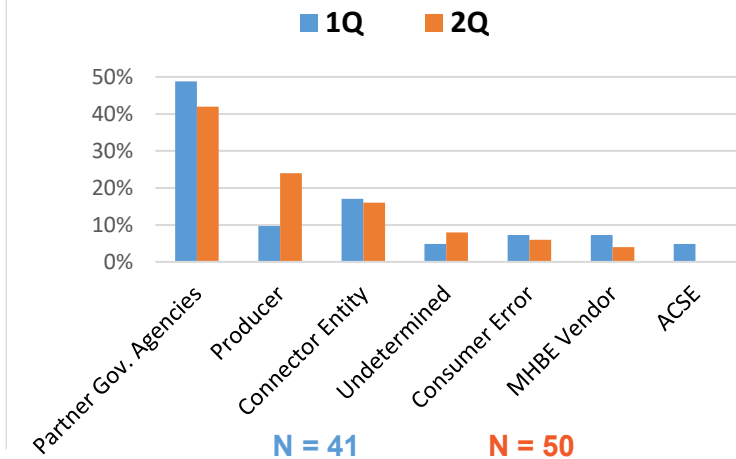
9% Decrease in Rate of Misloads



71% Decrease in Rate of CSR Errors



Responsible Entities



Q2 FY22 YTD Fraud, Waste and Abuse Allegations

3 – Allegations

- 1 Not Founded
- 1 Referred to MDH
- 1 Procurement Policy Issue

No Civil Rights Complaints

Debarment And Screening

- ✓ **Screened – All clear**
 - IDIQ Master Contractors
 - Vendors
 - 4 Carriers
 - 65 MHBE Employees
- ✓ **IDIQ Master Contractor Screening Compliance – 3Q Sample Selection**
- ✓ **Await Maximus Clarification regarding screening of all federal funds recipients**

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	15-Feb	In Progress			[Solid Blue Bar]											
DBM-RED Audit	15-Oct	2-Feb	Complete				[Solid Green Bar]										
Quarterly POA&M & Vulnerability Scan Results	1-Jan	31-Jan	Complete							[Solid Green Bar]							
Authority to Connect (ATC) <ul style="list-style-type: none"> • System Security Plan (SSP) • Privacy Impact Assessment (PIA) • Security Assessment Report (SAR) • Plan of Action & Milestones (POAM) • Interconnection Security Agreement (ISA) • Computer Matching Agreement (CMA) • Information Exchange Agreement (IEA) 	1-Jan	15-Apr	In Progress							[Solid Blue Bar]							
System Security Report (SSR) / IRS Corrective Action Plan (CAP)	13-Jan	31-May	In Progress								[Solid Blue Bar]						
Independent External Financial Audit - FY 2021	3-Feb	31-Mar	In Progress								[Solid Blue Bar]						
Independent External Programmatic Audit - PY 2021	1-Mar	31-May	Not Started									[Solid Yellow Bar]					

Q2 FY22 Audit Status Report

Open Audit Findings

- (2) OLA Triennial Fiscal Compliance Audit
- (1) OLA Triennial Information Systems Audit
- (1) SMART PY20
- (1) HHS OIG Recommendation 2015

Current CMS Audits

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

Ongoing State Audit

Single State Audit

Status of Internal Review Recommendations

	Outstanding FY21 Recommendations	FY22 Recommendations	Mitigate – On Schedule	Mitigate – Complete
Operations - Producer Operations	2		2	0
Operations - Appeals & Grievances	0	0	0	0
Operations - Connector Entity Program	1		0	1
Operations - Application Counselor Programs	1		1	0
IT - Project Management Office	0	2	0	2
Plan Management	2		2	0
Marketing	0		0	0
Contract Management – CSC and Fulfillment	0	0	0	0
PMO / HR / IT Security - FTI Access	0		0	0
Employment, Benefits & Workplace	0	5	3	2
	6	7	8	5



Questions?

Thank you for your leadership.

MHBE Compliance Hotline 410-547-6862