Compliance Update

MHBE Board Meeting
November 23, 2015

COMPLIANCE PROGRAM UPATE

Compliance Plan 2015

1. Oversight Structure
2. Policies and Procedures
3. Hiring and Contracting Process
4. Compliance Awareness, Education and Training
5. Audit, Monitor and Evaluate Program Effectiveness
6. Reporting Requirements
7. Risk Assessments

COMPLIANCE PROGRAM UPDATE

Compliance and Ethics Plan

Focus	Description	Action Implemented
Oversight Structure	❖ Create Oversight Structure and Culture of Accountability, Compliance and Ethics. ❖ Provide structure and resources that support an effective compliance program.	❖ Create Audit Compliance Manager PIN ❖ Hire IT Internal Audit Expertise
Policies and Procedures	❖ Perform activities in compliance with pertinent laws and regulations while making effective use of resources, property and finances by utilizing best practices.	❖ Prioritize Policy and Procedure Development ❖ Implement Internal Controls ❖ Policy on Policy ❖ Capital Inventory Management Program

Compliance and Ethics Plan(Cont.)

Focus	Description	Action Implemented
Hiring and Contracting	❖ Ensure appropriate use of screening and procurement processes.	❖ Develop and implement procurement policies and procedures. ❖ Execute Non-Exchange Entity Agreements ❖ Develop Subaward Recipient Requirements Under Transparency Act Policy
Compliance Awareness, Education and Training	❖ Set expectations and educate employees and contractors in practices that support of a culture of compliance.	❖ Update FWA, Privacy, and IT Security Modules ❖ Revise New Hire Compliance, Privacy and IT Security Training

MARYLAND HEALTHBENEFIT EXCHANGE

Compliance and Ethics Plan (Cont.)

Focus	Description	Action Implemented
Audit, Monitor and Evaluate Program Effectiveness	❖ Oversight and monitoring of financial and programmatic activities. ❖ Proactively verify consistent implementation of programs. ❖ Identify and investigate instances of violations. ❖ Identify gaps/weaknesses in established procedures.	❖ Create Internal Audit Plan ❖ Implement Contract Management Processes ❖ Revise Onboarding Process
Reporting Requirements	❖ Provide mechanisms to report suspected and actual Fraud, Waste and Abuse, non-compliance with Code of Conduct, and Privacy incidents.	❖ Provide Multiple Reporting Routes ❖ Privacy Incident Reporting Process ❖ Compliance Hotlines

COMPLIANCE PROGRAM UPDATE

Compliance and Ethics Plan (Cont.)

Focus	Description	Action Implemented
Risk Assessments	❖ **Proactively Create and implement risk assessments to identify, assess and mitigate risk.**	❖ **IT Security Assessments and Reviews** ❖ **Privacy Impact Assessment** ❖ **Privacy Risk Assessment**