20335 – Benefits Production Access

Status Report:
04/14/2021

AGENDA

Project Status

Walkthroughs & Meetings

Data Requests

Initial Observations

Appendix

Project Status

➢ Planning and Scoping Phase – Complete

- Kick-Off deck distributed to stakeholders on 3/19/2021.

➢ Control Analysis Phase – In Progress

- 1 of 3 controls validated with owner.

➢ Fieldwork Phase – In Progress

- Follow-up communications held to understand the evidence receive, testing underway.

➢ Reporting Phase – Not Started

Walkthroughs & Meetings

	Team	Meeting Topic	Scheduled Date	Completed Date	Follow up Date	Completed Date	Attendees
		Meeting Schedules					
1	(IT)	Benefits Production Access Review – Background (Green Screen Demo)	02/05/2021	02/05/2021			Angela Dickinson, Martin Mangin
2	(IT)	Manual Claims – Access Discussion	02/12/2021	02/12/2021			Pranav Gupta, Deepak Mugundu, Aizaz Ahmad, Markus Watson, Jeffery Steele, Joshua Godfrey, John Gloster, Sheila Barbour
4	(IT)	EzTest Tool Walkthrough	03/18/2021	03/18/2021			Hemanth Pappu, Mohan Manchashetty, Aizaz Ahmad, Ganga Merneedi
5	(Ops)	HP - Quality Assurance and Release Management Process walkthrough	03/08/2021	03/08/2021			Narsimha Namburi, Robyn Martin, Amber Nadeem Kothawala, Rajendra Jupaka, Sandanalakshmy Pajany Nayadu
6	(Ops)	Employer Commercial - Quality Assurance and Release Management Process Walkthrough	03/09/2021	03/09/2021			Shalin Nath, Matthew Benger, Heather Boyce, Robyn Martin, Amber Nadeem Kothawala
7	(Ops)	Aetna - Quality Assurance and Release Management Process Walkthrough	03/11/2021	03/11/2021			Jason Park, Faisal Naeem, Heather Boyce, Robyn Martin, Amber Nadeem Kothawala
8	(IT)	Manual claim libraries - User groups and Permissions	3/31/2021	03/31/2021			Mitchell Super, Aizaz Ahmad, Diana Johnston, Nicole Frazier, Kathie Graceffa

Walkthroughs & Meetings Cont'd

	Meeting Schedules					
	Team	Meeting Topic	Scheduled Date	Completed Date	Follow up Date	Completed Date	Attendees
9	(IT)	Panel ID Access - Walkthrough	04/01/2021	04/01/2021			Diana Johnston, Aizaz Ahmad
10	(IT)	Manual Claims – Access Discussion (II)	04/06/2021	04/06/2021			Pranav Gupta, Deepak Mugundu, Aizaz Ahmad
11	(IT)	Control validation	04/08/2021	04/08/2021			Pranav Gupta, Deepak Mugundu, Aizaz Ahmad,
12	N/A	RxClaim Role codes	04/08/2021	04/08/2021			Kishore Munagala, Mitchell Super, Binod Poddar, Pranav Gupta, Pramesh Dhasmana,
13	(IT)	Control validation (II)	04/12/2021	04/12/2021			Pranav Gupta, Deepak Mugundu, Aizaz Ahmad, Dwarakanath, Raghunathan
14							
15							

Data Requests – as of 04/14/2021

Data Requests									
#	Team	UID	Title	Request Date	Due Date	Follow-up Date	Status	Preparer/s	Additional Preparer/s
1	(IT)	5737	RxClaim – Manual claim Panel IDs	02/16/2021	03/02/2021		Closed	Deepak Mugundu Balan	Pranav Gupta
2	(IT)	5738	Files and Libraries	02/16/2021	03/09/2021		Closed	Diana L Johnston	Pranav Gupta, Deepak Mugundu Balan, Michael ONeill
3	(IT)	6782	Manual Claims Libraries – Access Permission	03/17/2021	03/26/2021		Closed	Jason Sheedy	Mitchell Super, Conway Norwood II, Deepak Mugundu Balan
4	(Ops)	N/A	Active Benefit Testers Listing	1/27/2021	02/01/2021		Closed	Faisal Naeem	
				1/27/2021	02/16/2021		Closed	Narsimha Namburi	
				1/27/2021	02/04/2021		Closed	Dinakar Anumolu	
				1/27/2021	03/02/2021		Closed	Kimberly Archibald	
				1/27/2021	02/04/2021		Closed	Kishore Korapati	

Data Requests Cont'd – as of 04/14/2021

				Data Requests					
#	Team	UID	Title	Request Date	Due Date	Follow-up Date	Status	Preparer/s	Additional Preparer/s
5	(Ops)	N/A	SalesForce.com screenshots and attachments for Aetna claims	03/26/2021	04/02/2021		Closed	Holly Burrington	
6	(IT)	7122	Manual Claims Libraries-Access Permissions (II)	04/01/2021	04/02/2021		Closed	Mitchell Super	
7	(IT)	7281	Manual Claims Libraries-Access Permission (III)	04/12/2021	04/14/2021		Closed	Jason Sheedy	Conway Norwood

Initial Findings

		Findings		
#	**Control Area**	**Findings**	**Impact**	**Owner**
1	Manual Claims Submission	IA obtained listings of all active Benefits Testers and compared to a listing of all users with PREPROD and PROD access to the Manual Green Screens. From this analysis, IA identified 191 Benefit Testers, including both onshore and offshore users, with inappropriate "read and update" access to the PROD environment. Per review of the rationales IA obtained from applicable leaders, it was noted that Benefit Testers need read-only access to PROD Manual Green Screens to perform claims testing. Additionally, it was brought to IA's attention, that issues arise when attempting to revoke PROD access for onshore members because PROD access cannot be removed without removing the PREPROD access users require to perform testing. IA has discovered that Benefit Testers access to Manual Claim in CCT600 can be removed by removing specific Panel IDs without impacting the access to Manual Screens in PREPROD.	IA identified 187 onshore and 4 offshore users with inappropriate access to Manual Claim screens in PROD environment.	TBD

Initial Observations

Observations				
#	Control Area	Observation	#	Owner
1				

Remaining Project Schedule

Project Schedule			
Step	Description	Expected Date	Status
1	**Phase I – Planning and Scoping**	01/31/2021	Complete
2	**Phase II – Control Analysis** Walkthrough Interviews & Control Validation	02/28/2021	In Progress
3	**Phase III – Fieldwork and Testing** Data Analysis & Test Execution	04/30/2021	In Progress
4	**Phase IV – Reporting**	05/31/2021	Not Started

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Appendix

Standard Terminology
Ratings & Management Action Plan

The rating of findings drives the timing of remediation and also the level of management that is responsible for developing and implementing action plans.

High	The identified risk requires the immediate attention of department and senior management to prevent the process from becoming ineffective, and an agreed-upon action plan for resolution is needed.
Medium	The identified risk requires the near-term attention of the responsible manager. There should be an agreed-upon action plan for its resolution.
Low	The identified risk does not warrant immediate attention; however, there should be an agreed-upon action plan for ultimate resolution.
Deficiency	If SOX related, rating categories will be assessed as Deficiency, Significant Deficiency, or Material Weakness.

Note: While the audit will focus on the objectives previously noted, IA has a responsibility to assess any additional risks identified during the audit, and report any issues identified. Where applicable, issues will also be evaluated against requirements for Sarbanes-Oxley or other regulatory standards.

Each Management Action Plan requires a remediation due date which is tracked by IA.

Remediation Due Date	Reflects the time required for Management to complete the agreed upon action plan, as well as time for IA to complete the associated validation procedures to ensure the action plan has been implemented effectively.

Escalation Protocol

Potential Causes for Escalation

- Data requests not received within expected timeframes

- Data provided does not align with follow-up requests for clarification

- Key attendees miss walkthrough meetings following confirmed schedules

- Internal Audit is denied access to key data or people that may impact findings

- Management accepts a level of residual risk not acceptable to the organization

- Management is not aligned with identified issues, risk priority ratings and/or the overall audit opinion

Escalation Process – when one or more of the above events occur

- Convey the issue to the next level of management

- The responsible SVP / VP may be notified of causes which delay audit execution

- Escalations may be tracked and reported during recurring status meetings with management

- The CAE may discuss with Senior Management and the Audit Committee, if necessary