

# GOVERNMENT PROGRAMS Compliance Officer Newsletter

Volume VI, Issue 1

March 2017

**INSIDE  
THIS  
ISSUE**

**WHAT IS  
COMPLIANCE?**

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**COMPLIANCE  
MYTHS  
AND  
FACTS**

•

**CROSSWORD  
PUZZLE**

**HEALTH CARE  
SERVICE  
CORPORATION**



## Message from Kim Green

### HCSC Government Programs Compliance Officer

Welcome to the Government Programs Compliance (GPC) quarterly newsletter. Our goal is to provide you with pertinent information relating to the administration of the various government programs administered by HCSC.

HCSC is a Plan Sponsor that administers several state and federal Government Programs, including:

- Medicare Advantage
- Medicare Prescription Drug Plan
- Medicare-Medicaid Alignment Initiative (MMAI) and
- Medicaid

As a Plan Sponsor we have the responsibility to know and adhere to the requirements of all the contracts we administer. If we fail to meet those requirements, we are at risk for being subjected to various enforcement actions.

Please remember that you are required to report any suspicious behavior or potential wrongdoing related to any government contract. You can report this information to your manager or our Corporate Integrity Hotline number, which is listed below. All calls to our hotline can be made anonymously and without fear of intimidation or retaliation. As the Government Programs Compliance Officer, please know that you can always contact me directly at 312-653-5110.

Kim Green  
HCSC Government Programs  
Compliance Officer

#### Government Programs Hotline

combining with Corporate Integrity Hotline

**For compliance questions  
or concerns related to:**

- Medicare Advantage
- Medicare Part D
- Medicare

**1-877-211-2290**

**1-800-838-2552**



**Corporate Integrity Hotline  
1-800-838-2552**

### WHAT IS COMPLIANCE?

#### Government Programs Compliance Purpose Statement:

- Anticipate & identify risks associated with meeting government contracts requirements
- Support business area effort to mitigate those risks, and
- Ensure timely and appropriate reporting of these activities to senior leadership

#### MYTH

Compliance programs, policies and procedures means “checking the boxes,” documenting and then putting them on a shelf.

#### MYTH

Compliance is all about the law

#### FACT

We must have **working policies and procedures that actively engage in the identification, mitigation and reporting of risks.**

#### FACT

Compliance programs are about **processes, procedures and controls** to ensure the rule of law is followed

#### EXAMPLE

At HCSC, we establish **working policies and procedures, engage with the Board of Directors and compliance committees, and use all the elements of an effective compliance program to prevent, find and remediate ethical and regulatory problems.**

#### EXAMPLE

At HCSC, **compliance implements the elements of a compliance program to prevent, find and remediate regulatory and ethical issues. It is essential that you know and adhere to the rules.**

DO YOU KNOW THE 7 ELEMENTS OF AN EFFECTIVE COMPLIANCE PROGRAM?

**Business areas have and follow documented processes, procedure and control to prevent issues with complying with the law**

#### 7 ELEMENTS OF AN EFFECTIVE COMPLIANCE PROGRAM

- |  |  |
|--|--|
| 1. <b>Written Policies &amp; Procedure</b>   | 5. <b>Publicized Disciplinary Standards</b>    |
| 2. <b>Compliance Officer &amp; Committee</b> | 6. <b>Effective Monitoring &amp; Auditing</b>  |
| 3. <b>Effective Training &amp; Education</b> | 7. <b>Prompt Response to Compliance Issues</b> |
| 4. <b>Effective Lines of Communication</b>   |  |

**Corporate Integrity Hotline: 1-800-838-2552**

## MYTH or FACT?

### MYTH

- Compliance
- defend the company
  - are cops
  - are prosecutors
  - fixes identified issues

### FACT

Compliance is **neutral, unbiased and unconflicted.**

### EXAMPLE

At HCSC, leadership receives facts regarding potential compliance issues, allowing leadership to make an informed decisions about how to mitigate risks & issues and prevent reoccurrences.

Do you **know, understand and integrate** the regulations related to your job function?

Know the rules

### MYTH

Compliance is punitive

### FACT

The government uses punitive measures to resolve issues

### EXAMPLE

At HCSC, by catching issues early, **compliance attempts to identify risks to mitigate their colleagues' exposure to punitive outcomes.**

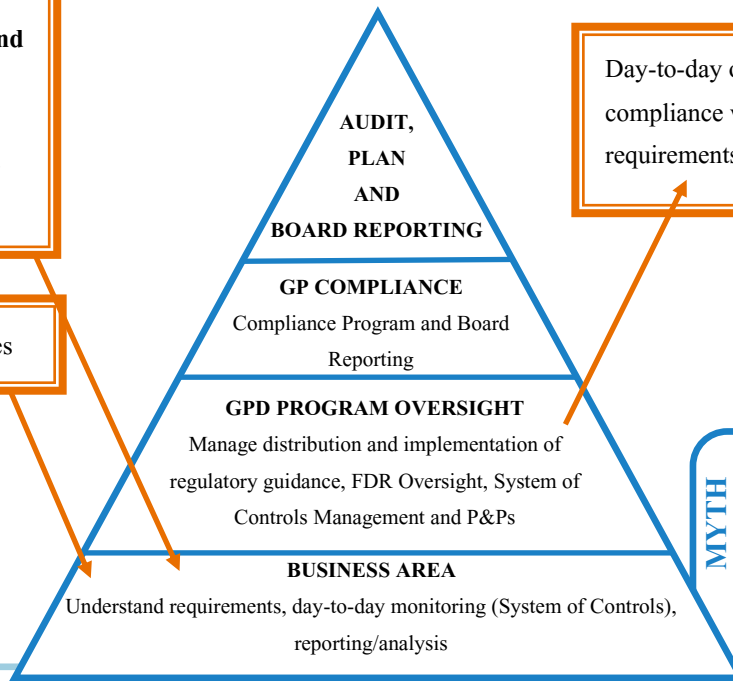
### FACT

**Compliance officers who find a compliance issue help to find a proper path to regulatory adherence. At HCSC, meeting regulatory requirements is part of meeting business objectives. Compliance supports business risks and mitigation efforts.**

### EXAMPLE

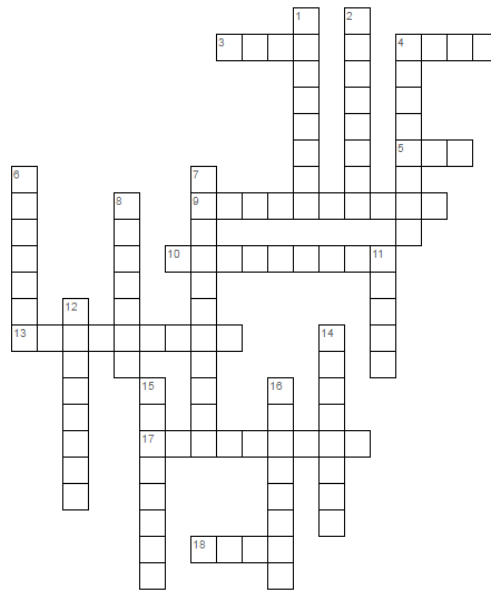
At HCSC, **Compliance helps individuals and the business achieve their objectives while mitigating the risk of a regulatory infraction.**

Day-to-day operations in compliance with the requirements



### MYTH

Compliance officers obstruct business



**Across**

- 3 HCSC is a Government Program Plan Sponsor in \_\_\_\_\_ states
- 4 myth or fact? compliance officers are biased
- 5 Centers for Medicare and Medicaid
- 9 compliance officers provide \_\_\_\_\_ with the facts, allowing them to make an informed decision
- 10 you may choose to remain \_\_\_\_\_ when calling the Corporate Integrity Hotline
- 13 training & \_\_\_\_\_
- 17 GPC reports its findings to the Board of \_\_\_\_\_
- 18 myth or fact: Effective compliance programs use all of the elements of a compliance program to prevent, identify and remediate regulatory problems

**Down**

- 1 federal health insurance program for people age 65 or older, certain younger people with disabilities, and people with End-Stage Renal Disease
- 2 first element of an effective compliance program
- 4 joint federal and state health insurance program that helps with medical costs for some people with limited income and resources
- 6 call to report a compliance question or concern
- 7 HCSC is a \_\_\_\_\_ of Government Contracts
- 8 compliance officers are \_\_\_\_\_
- 11 # of elements of an effective compliance program
- 12 compliance attempts to prevent their colleagues from suffering \_\_\_\_\_ outcomes
- 14 GPC Compliance Officer
- 15 effective monitoring and \_\_\_\_\_
- 16 One compliance purpose: support business areas to \_\_\_\_\_ risk

## CONTACT INFORMATION



Email

[hiscompliance@bcbsil.com](mailto:hiscompliance@bcbsil.com)



Hotline - Available 24/7

**REPORT ANONYMOUSLY**



Website

[www.hiscompliance.com](http://www.hiscompliance.com)

**Corporate Integrity Hotline: 1-800-838-2552**