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GOVERNMENT PROGRAMS

Compliance Officer Newsletter

A Message from Kim Green:

My goal for each Government Programs Compliance Officer Newsletter is to provide you with information about the various government programs administered by HCSC.

HCSC is a Plan Sponsor that administers several Federal and State Government Programs, including:

- Medicare Advantage
- Medicare Prescription Drug Plan
- Illinois 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.

This newsletter edition will highlight monitoring. Monitoring plays a very important role in our organization to ensure HCSC is compliant with federal and state regulations. In this edition, we will review the basics of monitoring and help you build your own monitoring process for your business area.

As the Government Programs Compliance Officer, please know you can always contact me directly at 312-653-5110.

Kim Green

HCSC Government Programs
Compliance Officer

HCSC Corporate Integrity HOTLINE 1-800-838-2552

How?
Can You Help?

- Watch for questionable activity
- Know the laws & HCSC policies
- Report any issues

For compliance questions or concerns related to:

- Medicare Advantage
- Medicare Part D
- Medicaid

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GPC Resources:

**Enterprise
Medicaid/Debarment**

**Melissa Lupella, Senior
Director**

NM Medicaid

**Jeanene Kerestes, Senior
Director**

IL Medicaid

Yvonne Yang, Director

TX Medicaid

Kirstie Reck, Director

Medicare/MMAI

Kathleen Klein, Director



What is Monitoring?

Monitoring involves reviewing processes, data, and documents to make sure activities are aligned with federal and state guidelines and identifying and responding to incidents of non-compliance. It is a key component in HCSC's Compliance Program and helps ensure that HCSC's Government Programs (Medicare, Medicaid, and MMAI) are performing in accordance with federal and state laws and regulations.

Types of monitoring:

- Routine monitoring is the day-to-day monitoring of operations that tests that the Business Units' operations are compliant with contract requirements and federal and state regulations. Business Units perform routine monitoring.
- Target monitoring focuses on risk-based monitoring activities to test specific, identified risks of non-compliance. The Government Programs Compliance Department performs targeted monitoring as a supplement to routine monitoring.



Why is Monitoring Important?

- Proactive identification of issues and risks of non-compliance.
- Requirements of the HCSC Compliance Program.
- It's mandatory in Medicare and Medicaid Contracts to ensure contractual requirements are being met.



What is Your Role in Monitoring?

- To conduct effective monitoring, you must know the rules and regulations related to your job function.
- Routinely review data and documentation.
- Evaluate and analyze an end-to-end process to make sure the process is compliant or so that you can identify any risks or issues of non-compliance.
- Review the performance and reporting of a first tier, downstream, or related entity (FDRs) and subcontractors.
- Remember, every business area is responsible for the compliance of their operational activities.
- Immediately alert Government Programs Compliance of any risks or issues of non-compliance as soon as they happen. CMS requires HCSC to act on identified Medicare Advantage/Part D issues within 14 days of discovery.



Contact Us

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Steps to Building a Monitoring Process

Step 1

- Identify the activity to be monitored.

Step 2

- Find the rule that governs the identified activity.
 - Federal and State laws
 - Medicaid Contracts
 - CMS rules and guidance
 - HPMS Memos

Step 3

- Determine how you will monitor the activity. (see below for example questions)
 - What data or documentation will you collect and analyze?
 - What end-to-end process flow and policies and procedures will you review?
 - If FDRs and subcontractors are involved, how will you collect the documentation?

Step 4

- Formally document the results of the monitoring activity. Report results to responsible leadership and Compliance.

Step 5

- Ensure the development and implementation of any necessary remediation steps and corrective actions to prevent recurrence of any identified issues.

Step 6

- Maintain all documentation and data related to the monitoring activity and any necessary follow up actions.

What About FDRs?

First Tier, Downstream, or Related Entities (FDRs) are defined by CMS for Medicare Advantage, Part D and Medicare and Medicaid Alignment Initiatives as any party that enters into a written agreement with HCSC or a subcontractor of HCSC to provide administrative services or health care services.

HCSC is responsible for ensuring compliance of all activities delegated to the FDRs. CMS requires HCSC to monitor and evaluate FDRs to ensure these first tier and downstream entities are compliant with applicable laws and regulations. This means that if you have a delegate performing a function within your business area, then you are required to monitor that delegate's compliance with federal and state regulations.

When an issue or risk arises related to FDRs, HCSC must make sure the entity is resolving the issue and preventing it from reoccurring.