GPC
Government
Programs
Compliance

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HCSC's Government Programs Compliance (GPC) Team:

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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 the role of Government Programs Compliance (GPC). The primary function of GPC is to administer the Compliance Program, which is mandatory for all Medicare, Medicaid, and MMAI contracts. In this edition, we will explore how GPC functions within HCSC, as well as review common misconceptions about GPC's role in compliance activities.

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

GPC
Government Programs Compliance

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
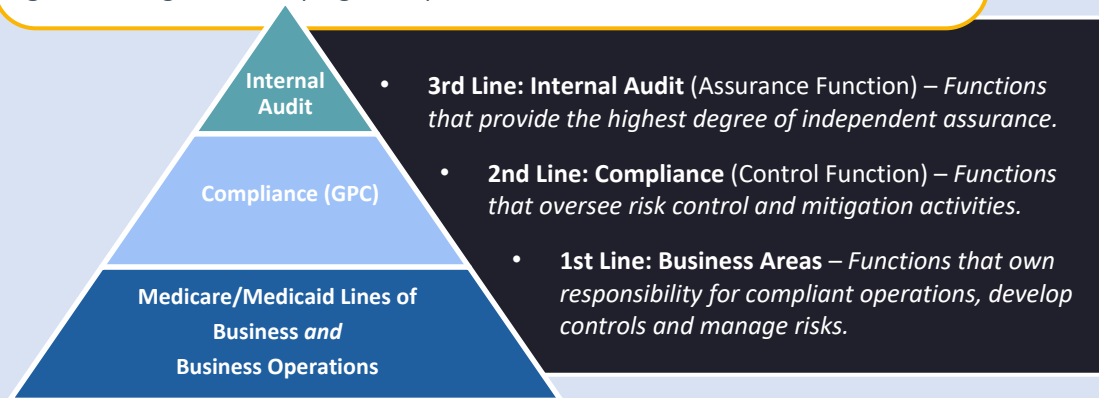**Kathleen Klein, Director**

GPC PURPOSE STATEMENT

1. ANTICIPATE AND IDENTIFY RISKS ASSOCIATED WITH MEETING GOVERNMENT CONTRACTS REQUIREMENTS;
2. SUPPORT BUSINESS AREA EFFORTS TO MITIGATE THOSE RISKS, AND;
3. ENSURE TIMELY AND APPROPRIATE REPORTING OF THESE ACTIVITIES TO SENIOR LEADERSHIP.

Who is GPC?

GPC is comprised of Compliance professionals split across teams that support and are accountable for the required Compliance Programs for Medicare, Medicaid (IL, NM, TX), and MMAI, in addition to enterprise Debarment activities.

GPC is also part of the **2nd line of defense** – a role intended to provide **oversight and guidance** to government programs operational and business areas.

Internal Audit

Compliance (GPC)

Medicare/Medicaid Lines of Business *and* Business Operations

- **3rd Line: Internal Audit** (Assurance Function) – *Functions that provide the highest degree of independent assurance.*
- **2nd Line: Compliance** (Control Function) – *Functions that oversee risk control and mitigation activities.*
- **1st Line: Business Areas** – *Functions that own responsibility for compliant operations, develop controls and manage risks.*

CONTRACT

What does GPC do?

GPC:
- ✓ Conducts oversight focusing on **monitoring**, **auditing**, **issue identification and tracking**
- ✓ **Coordinates** with other departments/business areas to ensure day-to-day monitoring processes are in place and functioning
- ✓ Provides **support**, **guidance**, **expertise**, and **coaching** related to government programs compliance matters

GPC does NOT:
- ✕ **Own operational risk or issue remediation**
- ✕ **Fix issues that arise from failures to meet contractual requirements**
- ✕ **Seek to obstruct, police, accuse, or punish business areas**

GPC focuses on how HCSC meets government contract requirements. GPC will track issue remediation and corrective action plans **based on what the business area has agreed to do.**

PUNITIVE MEASURES COME FROM OUR REGULATORS.

Contact Us

Email

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24/7 Hotline

1-800-838-2552

REPORT
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The Compliance Program is mandatory for all Medicare, Medicaid, and MMAI contracts and must, at a minimum, include the following:

4. WRITTEN POLICIES & PROCEDURES
5. COMPLIANCE OFFICER & COMMITTEE
6. EFFECTIVE TRAINING & EDUCATION
7. EFFECTIVE LINES OF COMMUNICATION

1. PUBLICIZED DISCIPLINARY STANDARDS
2. EFFECTIVE MONITORING AND AUDITING
3. PROMPT RESPONSE TO COMPLIANCE ISSUES

REQUIREMENTS FOR FRAUD, WASTE AND ABUSE ARE PART OF EACH OF THE ABOVE REQUIREMENTS.

Why does GPC do what they do?

GPC activities are driven by the Compliance Program contractual requirements for each government line of business. GPC coordinates all elements of the Compliance Program across departments to meet these requirements. Failure to do so may result in various enforcement actions.

- Business areas own the responsibility to operate in accordance with each contract and the regulatory requirements that relate to their function.
- GPC monitoring seeks to confirm they are operating in compliance.

When does GPC get involved?

Compliance issues can be identified through several means. **The following are examples of what could trigger GPC to become further involved:**

1. GPC identifies an issue through a monitoring activity
2. Business areas self-report an issue to GPC for support or guidance
3. Medicaid/Medicare Operations or Performance & Delivery teams loop in GPC when as issue is found
4. A regulator raises a question
5. Delegate reporting that requires investigation or follow-up
6. Ethics and Compliance or fraud hotline issue involves government

How does GPC maintain Compliance?

GPC upholds Compliance through several means, including but not limited to:

1. Performing Medicare and Medicaid **annual risk assessments** and developing **monitoring and audit workplans**
2. Performing **risk-based targeted monitoring activities** to proactively identify issues and risks of non-compliance
3. **Overseeing day to day monitoring results** conducted by the **business areas**
4. **Ensuring a plan is in place to remediate issues when they are identified** in order to prevent reoccurrence (includes oversight of internal remediation and corrective action plans)

   REMINDER: *The business areas (1st line of defense) are responsible for remediating issues and operating in compliance with the requirements*

Compliance is the Responsibility of all Employees