

GOVERNMENT PROGRAMS COMPLIANCE OFFICER NEWSLETTER

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HEALTH CARE SERVICE CORPORATION



*Message from Kim Green
HCSC Government Programs Compliance Officer*

Welcome to our third quarter newsletter for 2014!

HCSC as the plan sponsor, has an obligation to adhere to the guidelines outlined by the Centers for Medicare & Medicaid Services (CMS). CMS has seven core requirements of an Effective Compliance Program. The first of those requirements is to have written policies, procedures and standards of conduct.

In the coming months, the Government Programs Division (GPD) is going to be undertaking a very important initiative to create and/or update Policies and Procedures surrounding our government programs lines of business. In support of that initiative, in this edition, we will provide a baseline of information about key components of Policies and Procedures and will answer the following questions: Why do we need policies and procedures? How should they be written? What are the essential components of a good policy and procedure?

If you work on one of our government programs (Medicare Advantage, Medicare Prescription Drug Plan, MMAI or Medicaid), you will be asked to participate in this initiative. It's important to have the tools necessary to complete these tasks.

Please do not hesitate to contact your business partners in the GPD if you have any questions regarding the development of policies and procedures.

As always, 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 Medicare hotline number, which is listed below. As the Government Programs Compliance Officer, please know that you can always contact me directly at 312-653-5110. We encourage you to visit our [website](#) and submit any topics that you would like to hear about in future newsletters.

Kim Green

HCSC Government Programs Compliance Officer

Inside this issue:

Why Do We Need P & P's?	2
Policies vs. Procedures	2
How to Write Policies and Procedures	3
Essential Components of Policies and Procedures	3

Medicare Compliance Issues?

Contact
HCSC Medicare Hotline
1.877.211.2290



Your 24/7 resource for questions
about Medicare Part D or MAPD



What are they and why do we need Policies and Procedures?

What is a policy?

A 'Policy' is a direct link between a company's 'Vision' and their day-to-day operations. Policies identify key activities and provide a strategy on how to handle issues.

What is a procedure?

A 'Procedure' provides a clear and easily understood plan of action required to carry out or implement a policy. A well-written procedure will often eliminate common misunderstandings by clearly identifying job responsibilities.

A policy is the way to document a company's plan of operation and the procedures are necessary to fulfill that policy. Solid Policies and Procedures essentially answer the "what" and "how" questions for employees. Some reasons we need Policies and Procedures are as follows.

⇒ **Requirement of an Effective Compliance Program**

The first requirement of an Effective Compliance Program as outlined by CMS includes having written Policies and Procedures.

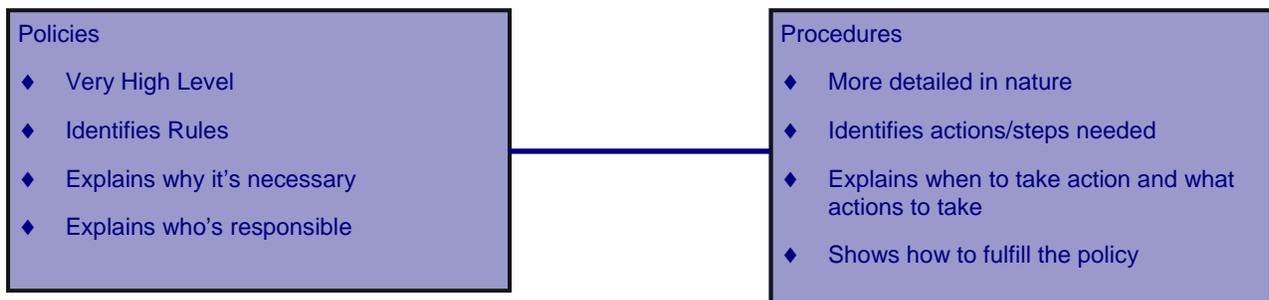
⇒ **Provides structure and outlines expectations**

Policies and Procedures help to create an internal control framework. Management can rely on this internal framework to ensure regulatory requirements are being met.

⇒ **Procedures translate into work instructions which leads to repeatable and consistent processes**

Written documentation leads to staff having a better understanding of their responsibilities.

Policies vs. Procedures



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How to Write Policies and Procedures

Before you begin, you should have a thorough understanding of the contractual requirements pertaining to your Policy. You may also want to list any areas you interact with during your business operations and how they relate to core responsibilities. Below are some guidelines you can follow when preparing to write your Policies and Procedures.

- ◇ All Policies should be in writing
- ◇ Use company issued template if available
- ◇ All Policies should be compliant with all applicable laws and regulations
- ◇ Procedures should include step-by-step instructions to complete tasks
- ◇ Policies and Procedures can include “definitions” and “additional resources”

Essential Components of Policies and Procedures

Policies and Procedures should at a minimum contain the information below.

- Inception/Revision Date or History
Date policy/procedure was established or revised. If revised, list reason for revision and person responsible
- Owner(s)
Who owns the policy
- Purpose
Brief description of the purpose of the Policy and Procedure
- Policy
Brief statement indicating what is the policy and practice of your organization
- Scope
Statement describing the areas or departments which this policy and procedure may impact
- Reference/Requirements
List of statutes and regulations that apply to this policy
- Management Oversight
Describe the oversight process
- Attachments
List any attachments included with the Policy and Procedure

CONTACT INFORMATION



Email - If you have any news or questions that you would like included in the newsletter, please send an email to: hisccompliance@bcbsil.com



Fraud Hotline - Available 24/7 - Report fraud issues anonymously

- ◇ 1-800-543-0867 - for Members
- ◇ 1-877-272-9741 - for Producers, Vendors & Providers
- ◇ 1-877-211-2290 - for Employees



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