



Government  
Programs  
Compliance

## Volume IX

## Issue 3

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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 importance of collaboration within Government Programs.**

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, call the Corporate Integrity Hotline number, or report your concern online using the web reporting tool ([www.hscs.alertline.com](http://www.hscs.alertline.com)). 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 Compliance

### Contact Us

#### Email

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



#### 24/7 Hotline

1-800-838-2552

REPORT ANONYMOUSLY



#### Website

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



## What comes to mind when you see the word compliance?

- Adhering to the Corporate Integrity and Compliance Program Charter (Compliance Program), including the Government Programs section
- Adhering to the Code of Ethics and Conduct
- Completing the annual compliance training
- Anticipating an identifying risk associated with meeting government contracts requirements
- Following departmental policies and procedures
- Routine monitoring of your business operations
- Identification of compliance risks and remediation within your business operations
- Reporting issues and issues of non-compliance to Government Programs Compliance
  - Including root cause and remediation with timelines
  - Institute monitoring to prevent a recurrence

### All the above!

The purpose of HCSC’s Government Programs Compliance (GPC) Department is to anticipate and identify risks associated with meeting government contract requirements, support business area efforts to mitigate those risks, and ensure timely and appropriate reporting of these activities to senior leadership.

The Business Functional Areas are responsible for ensuring we meet our contractual and regulatory requirements for the government programs we administer.

**Take away: Collaboration between GPC and the Business Functional Areas is essential to accomplishing these goals.**



### What is GPC’s Role?

The Compliance Program requires increased coordination with our business partners and operational areas to prevent, detect, correct and report risks and issues of non-compliance. Collaboration with our functional areas reduces the risk of issues of non-compliance as well as potential penalties. This work includes, but is not limited, to:

- Conducting an Annual GPC Risk Assessment



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## GPC Resources:

**Enterprise  
Medicaid/Debarment:**  
**Melissa Lupella, Senior  
Director**

**NM Medicaid:**  
**Jeanene Kerestes, Senior  
Director**

**IL Medicaid:**  
**Ryan Lipinski, Director**

**TX Medicaid:**  
**Kirstie Reck, Director**

**Medicare/MMAI:**  
**Shawna Romero,  
Director**

- Performing Targeted Monitoring Activities
- Making recommendations for improving processes and reducing risks
- Administering required [Compliance and FWA training](#)
- Supporting [HCSC's Corporate Integrity Hotline](#) and web reporting through compliance reviews of the reports of ethical concerns
- Managing CMS Program Audits and State Medicaid Audits
- Assisting with the Regulatory Performance Liaison Project
- Ongoing reporting to Committee and Boards

### *What is Your Role?*

- Know the contractual and regulatory requirements that relate to your job function(s).
- Know and follow your department's documented processes, procedures, and controls to prevent issues of non-compliance.
- Seek help from your management if you are not sure about what regulatory requirements apply to your job.
- Communicate regularly and provide feedback to management about performance and suggestions for process improvements.
- Know your business area monitoring activities, and when there are issues identified make sure to fix those issues, that's how HCSC maintains a good reputation and ensures obligations to its regulators are met.
- Communicate regulatory changes to your business area and implement appropriate process modifications.
- Complete all corporate or job-specific training assigned to you.
- Notify GPC if you find an issue of non-compliance. You can rely on HCSC's strong non-retaliation policy that protects anyone who reports an issue in good faith.
- Provide complete and timely responses to GPC on requests for information or data related to compliance investigations.