

GOVERNMENT PROGRAMS

Compliance Officer Newsletter

Volume VII, Issue 4

December 2018

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Back to Basics

Series:

Series Conclusion

- Prevention
- Detection
- Correction
- Reporting

Coming Next

Another series
arrives in 2019—
stay tuned!

HEALTH CARE
SERVICE
CORPORATION

A Message from Kim Green

Welcome to our final 2018 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. This year we went “back to the basics” and discussed the foundational principles of compliance. These four topics, when put together into a series of action steps, create an effective method for addressing compliance issues.

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, call the Corporate Integrity Hotline number, or report your concern online using the [web reporting tool](#). 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

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

Integrity • Respect • Commitment • Excellence • Caring



This “Back To Basics” series discussed essential components of prevention, detection, correction and reporting. Each action step is critical to the success of HCSC’s compliance program. The four steps are implemented independently of one another but also work together to build a framework for ensuring compliant operations. Together, we meet HCSC’s obligation to manage issues of non-compliance through effective prevention, detection, correction and reporting.



All employees who work on Medicare and Medicaid have an essential part to play in compliance. Any individual, department or vendor providing administrative support to Medicare, Medicaid, and MMAI lines of business is responsible for knowledge of and adherence to the regulatory requirements that apply directly or indirectly to your business functions.

Remember that discovering and reporting an issue is a success.



This series focused on addressing compliance issues that may arise during your work. Due to the size and scope of our Medicare and Medicaid business, issues are inevitable.

On the next page, we summarize the key points from each quarter’s newsletter and “connect the dots” between the topics to demonstrate how they are interconnected.

The starting point — first, last and always — is the rules.

- Staff working on Medicare need to have a fundamental knowledge of CMS’s managed care manuals.
- Medicaid products are governed by the terms set forth in our contracts with each state.
- MMAI is governed by the IL state contract and CMS Medicare rules.

Links to these resources are included on Page 4 of this newsletter.

PREVENTION

- Each department must have policies and procedures that are rooted in the rules and regulations related to the department's work. Policies and procedures must be updated at least annually.
- All employees working on Medicare and Medicaid must receive job-specific training. Job-specific training is tailored to the individual employee, taking into account (1) his/her existing knowledge base, (2) the work of the department, and (3) the rules governing that work. HCSC's general compliance and FWA training, while required, are not considered to be job-specific training.
- Promptly implement guidance received through HPMS notices, which may include revising policies and procedures. CMS uses HPMS notices to communicate with Plans.

DETECTION

- Effective monitoring is one of the best ways to identify issues. To conduct effective monitoring, you must know the rules related to your job function. Routine monitoring is one of the 7 elements of an effective compliance program.
- HCSC must engage in effective monitoring of First Tier, Downstream, and Related Entities (FDRs). HCSC is held accountable for all activities that have been delegated to FDRs.
- Once issues are identified, take immediate corrective action.

CORRECTION

- To correct an issue, use the "life cycle" approach:
 1. Identify the issue
 2. Identify the root cause
 3. Identify steps to remediate the issue
 4. Engage in ongoing monitoring to prevent recurrence
- Issues require addressing the immediate issue and remediation to prevent recurrence.
- Remember that you are obligated by the Code to participate in or assist in the remediation of issues within the scope of your responsibilities.

REPORTING

- GPC routinely reports the status of the Compliance Program and known or suspected issues of non-compliance to the HCSC governing bodies and compliance committees.
- Internal reports, regulatory oversight monitoring, and ad-hoc reports from regulators are three types of frequently used reports. These reports help reveal compliance issues that require improvement or confirm adherence to rules and regulations, show a "big picture" snapshot of your business area, and provide information to the regulators upon request.
- All employees working on Medicare or Medicaid play an important role in reporting because reports are an objective measure that reflect the status of your work and our operations here at HCSC. Accurate reports that address our required metrics help HCSC adhere to our regulatory and contractual obligations.

REMEDIAL ACTION MAY REQUIRE TRAINING AND CHANGES TO POLICIES AND PROCEDURES

ISSUE DETECTION ALWAYS LEADS TO ISSUE CORRECTION

MONITORING RESULTS ARE PROVIDED TO HCSC LEADERSHIP

Corporate Integrity Hotline: 1-800-838-2552

IMPORTANT RESOURCES

Web Resources

CMS Medicare Managed Care Manuals

HCSC's Corporate Integrity and Compliance Program Charter

HPMS Memos on the CMS website (updated weekly)



GPC "Back to Basics" Newsletters

Prevention

Detection

Correction

Reporting



Other

Corporate Resources



Corporate
Resources

Government Contracts



Government
Contracts

CONTACT INFORMATION



Email

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REPORT ANONYMOUSLY



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