

# GOVERNMENT PROGRAMS

## Compliance Officer Newsletter

Volume VII, Issue 1

March 2018

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#### Back to Basics

Series:

## Detection

- **Monitoring**
- **FDR Monitoring**
- **Issue Identification**



HEALTH CARE  
SERVICE  
CORPORATION



### Message from Kim Green

Welcome to the 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.

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 or our Corporate Integrity Hotline number, which is listed below. 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 Hotline

combining with Corporate Integrity Hotline

For compliance questions  
or concerns related to:

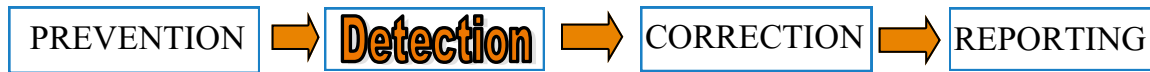
- Medicare Advantage
- Medicare Part D
- Medicare

**1-877-211-2290**

**1-800-838-2552**



All of us who work on government programs have an essential part to play in compliance. Together, we meet HCSC’s obligation to manage issues of non-compliance through effective prevention, detection, correction and reporting. We continue this “Back To Basics” series with the second of these action steps: DETECTION.



## MONITORING

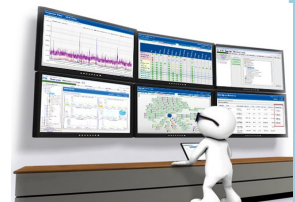
### Why do we need monitoring?

Monitoring is one of the most effective ways to detect issues of non-compliance. CMS requires HCSC (as a Plan Sponsor) to have an effective system for routine monitoring of compliance risks. In fact, routine monitoring is one of the 7 elements of an effective compliance program.

When we are engaged in monitoring, critical analysis of the monitoring results allows us to detect and correct issues that may otherwise go unnoticed. If a current business practice doesn’t follow the rules and regulations, we are then in a proactive position to correct any underlying issues.

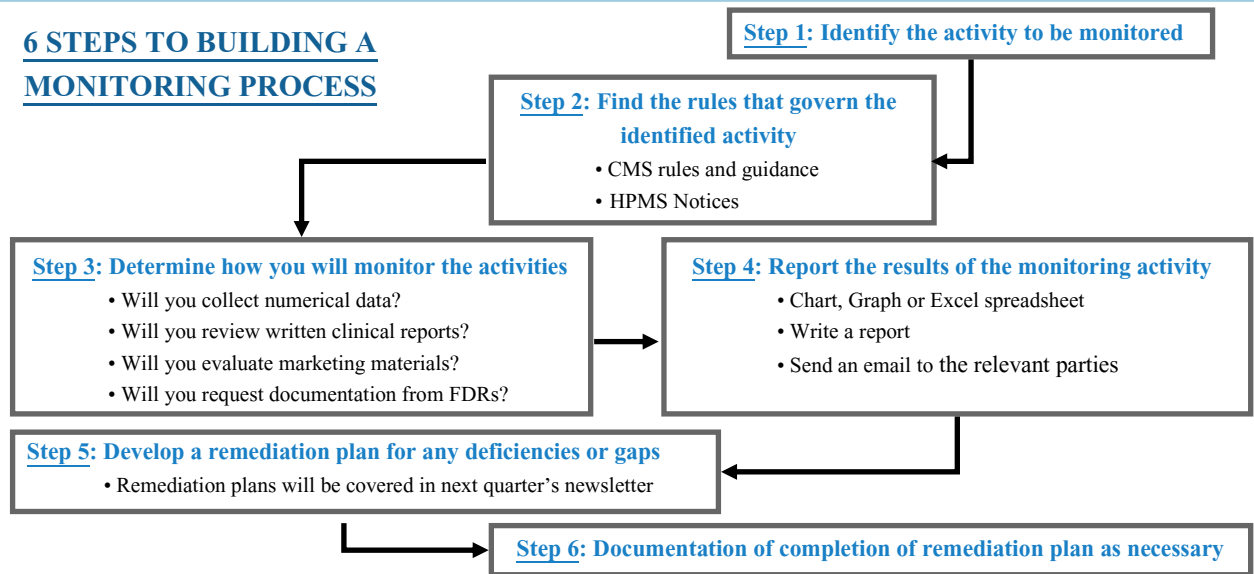
### Your role in monitoring may include:

- ◆ reviewing data
- ◆ evaluating and analyzing an end-to-end business process to ensure compliance or identify gaps
- ◆ reviewing the practices of a first tier, downstream, or related entity



**To conduct effective monitoring, you must know the rules related to your job function.**

## 6 STEPS TO BUILDING A MONITORING PROCESS



## FDR MONITORING

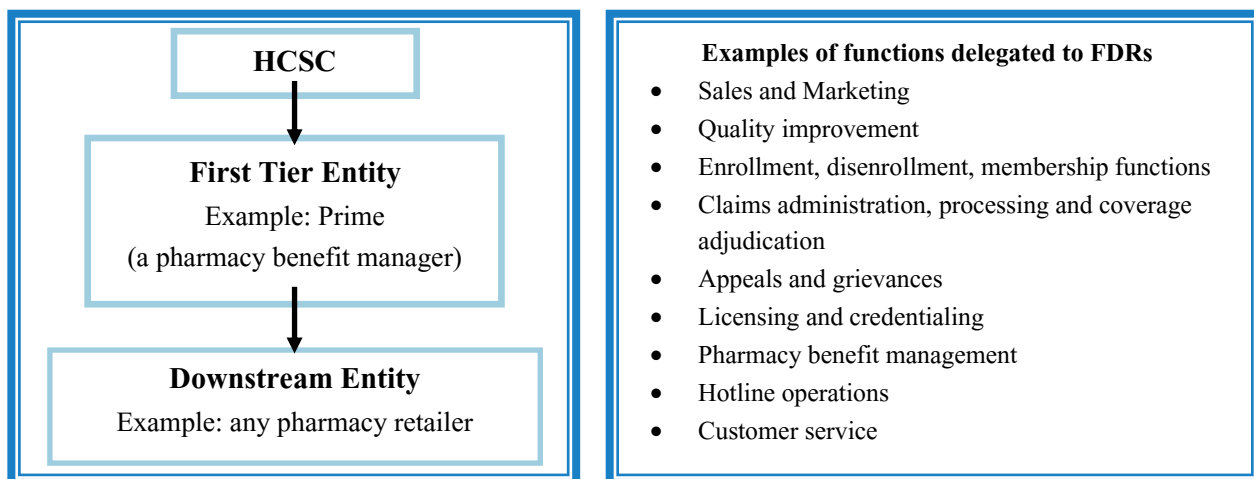
HCSC enters into contracts with First Tier, Downstream, and Related Entities (FDRs) to provide administrative and health care services for our members on behalf of HCSC. You can see some examples of functions performed by FDRs in the box below.

### **HCSC is accountable for all activities that have been delegated to FDRs.**

HCSC is ultimately responsible for ensuring that the terms and conditions of our government programs contracts are fulfilled. CMS holds HCSC responsible for an FDR's performance. CMS requires HCSC to have a system in place to monitor FDRs and make sure that FDRs are compliant.

### **HCSC must demonstrate not only that there is FDR monitoring but also that our monitoring is effective.**

To effectively monitor FDRs, we must review and analyze all reports submitted to HCSC by FDRs for adherence to contractual requirements.



Typically, each FDR monitoring activity is more complex and requires a more detailed analysis by the responsible HCSC employee than non-FDR monitoring. The business owner of the relationship with the FDR performs direct monitoring of the FDR's performance. An effective monitoring plan identifies issues and risks of non-compliance by the FDR and promptly responds to remediate those risks. HCSC must retain documentation to demonstrate to CMS that the FDR has remediated any issues of non-compliance. Documentation may include revised policies and procedures, updates to FDR processes, employee training, and metrics reports.



FDRs were the topic of the 2013 Q2 GPC Newsletter.

For more information, click the link below

<http://www.hiscscompliance.com/pdf/newsletter-2-2013.pdf>



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

**Corporate Integrity Hotline: 1-800-838-2552**

## ISSUE IDENTIFICATION

Due to the size and scope of our Government Programs business, issues are inevitable and will surface during the course of our work. We want to find the issues ourselves within the business and, once issues are detected, take immediate corrective steps.

**Discovering and reporting an issue is a success!**

### ISSUE

Any discoverable action or outcome that is suspected or known to be non-compliant

You may identify an issue in a number of ways, such as while analyzing reports, answering beneficiary calls or handling claims or appeals. During your daily monitoring, pay attention and use your critical thinking skills — stay alert for issues!

You have several options to report suspected or known issues of non-compliance. You can:

- ◆ Speak with your department's management
- ◆ Contact the Corporate Integrity HOTLINE at 1-800-838-2552
- ◆ Call or email a member of the GPC department

## IN THE NEXT ISSUE

After identifying an issue, the next important action is correction.

In the next issue, Q2 of 2018, we will continue this “Back To Basics” series with the third action step:

### CORRECTION

We will cover the following topics:

- Issue Correction “Life Cycle”
- Remediation Plans

## CONTACT INFORMATION



Email

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



Hotline - Available 24/7

REPORT ANONYMOUSLY



Website

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

**Corporate Integrity Hotline: 1-800-838-2552**