

# GOVERNMENT PROGRAMS

## Compliance Officer Newsletter

Volume VI, Issue 4

December 2017

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#### Back to Basics Series:

## Prevention

- Policies and Procedures
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- HPMS Memos

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 first of these action steps: PREVENTION.



Three essential components to the prevention of non-compliance are (1) creating and updating Policies and Procedures; (2) engaging in job-specific training; and (3) the prompt implementation of regulatory changes announced via HPMS Notices.

## POLICIES AND PROCEDURES

Each department must have policies and procedures that apply the rules that relate to your department. Together, policies and procedures ensure that the department is clearly identifying objectives and that those objectives, rooted in the rules, are translated into steps that result in the desired outcome stated in the policy.



### POLICY

A policy is how you, as a department, will satisfy the rules related to your function.

### PROCEDURE

Procedures are clear, easily understood plans of action or step-by-step instructions used in the day-to-day operations of your department to carry out or implement a policy.

## WHAT TO CONSIDER WHEN WRITING AND REVISING YOUR POLICIES AND PROCEDURES

### **Do your policies clearly demonstrate what functions you are performing and why?**

All policies must articulate what functions you are performing as a department.

### **Are your policies rooted in the relevant regulatory guidance? Do your procedures tie back to the applicable policy/policies and regulatory guidance?**

All policies and procedures must comprehensively cover the rules applicable to your department.

### **Do your procedures walk you through the step-by-step process of how you perform the functions outlined in the policy?**

Procedures must relate back to the policy and explain how an individual would accomplish the policy objective. A successful procedure provides enough detail (alone or in conjunction with job aids or other supplemental documents) that a person unfamiliar with the business function can use the procedure to complete the task independently.

### **Do you revise both your policies and procedures annually?**

Policies and procedures are to be revised at least annually. Evaluate whether the policy or procedure continues to be relevant and necessary. Have you made changes to reflect new or changed processes?

Policies and Procedures were also covered in the Compliance Officer Newsletter in Q3 2014. You can access it with this link:



<http://www.hiscompliance.com/pdf/newsletter-3-2014.pdf>

## JOB-SPECIFIC TRAINING



All employees who work on government programs are required to receive job-specific training at initial onboarding and continually throughout employment. Job-specific training is teaching employees the skills, knowledge, and competencies that are needed to perform his or her specific job within the department. Job-specific training takes into account the functions of that department, the rules governing those functions, and the employees' existing knowledge base.

### Examples of Job-Specific Training

- Onboarding training with your department
- Training on the rules applicable to your function
- Training on your department's policies and procedures
- Routine or ad-hoc department staff meetings

Employees who have any connection to Medicare Advantage, Medicare Prescription Drug Plan, Medicare-Medicaid Alignment Initiative (MMAI) and/or Medicaid are working on government programs and are subject to the obligation for job-specific training.

## REMEMBER

The general compliance and Fraud, Waste and Abuse training required as part of your HCSC employment is **not** sufficient to meet this obligation and is **not** considered job-specific training. Job-specific training must relate to the specific rules for your job functions.



You can find CMS guidance at the online Managed Care Manual:

<https://www.cms.gov/Regulations-and-Guidance/Guidance/Manuals/Internet-Only-Manuals-IOMs-Items/CMS019326.html>

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

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

## HPMS NOTICES

A third and final way that HCSC engages in effective prevention of non-compliance with government programs is the prompt, consistent implementation of HPMS (Health Plan Management System) notices. CMS uses HPMS notices and memos to inform Plan Sponsors of changes to rules and regulations, the results of monitoring, corrections to model marketing materials, upcoming CMS-sponsored conferences and trainings, and other Plan-related communications.

CMS expects all Plan Sponsors to receive HPMS notices and take actions to implement and then follow up to ensure compliance with the new guidance. HPMS notices, and the changes in the regulations that they signal, may require the updating of policies and procedures within departments and job-specific training.

Program Oversight distributes and assigns HPMS memos. If assigned an HPMS memo, your obligation is to review the memo, implement any necessary changes, and submit your documentation to Program Oversight.



All of the HPMS memos can be found on this SharePoint site:

[http://community.fyiblu.com/sites/GPDProgram/Shared%20Pages/HPMS\\_Home.aspx](http://community.fyiblu.com/sites/GPDProgram/Shared%20Pages/HPMS_Home.aspx)

## IN THE NEXT ISSUE

In the next issue, Q1 of 2018, we will continue this “Back To Basics” series with the second of these action steps:

### DETECTION

We will cover the following topics:

- Monitoring
- FDR Monitoring
- Issue Identification

## **CONTACT INFORMATION**



**Email**

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



**Hotline - Available 24/7**

**REPORT ANONYMOUSLY**



**Website**

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

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