

GOVERNMENT PROGRAMS

Compliance Officer Newsletter

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HEALTH CARE
SERVICE
CORPORATION

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.

This edition explains the corporate resources that are available for reporting your concerns about adherence to our Code of Ethics and Conduct, compliance with Government Programs, and provider or member fraud, waste and abuse. HCSC's Speak Up! campaign provides additional support and information, including the [Guide for Speaking Up](#).

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:

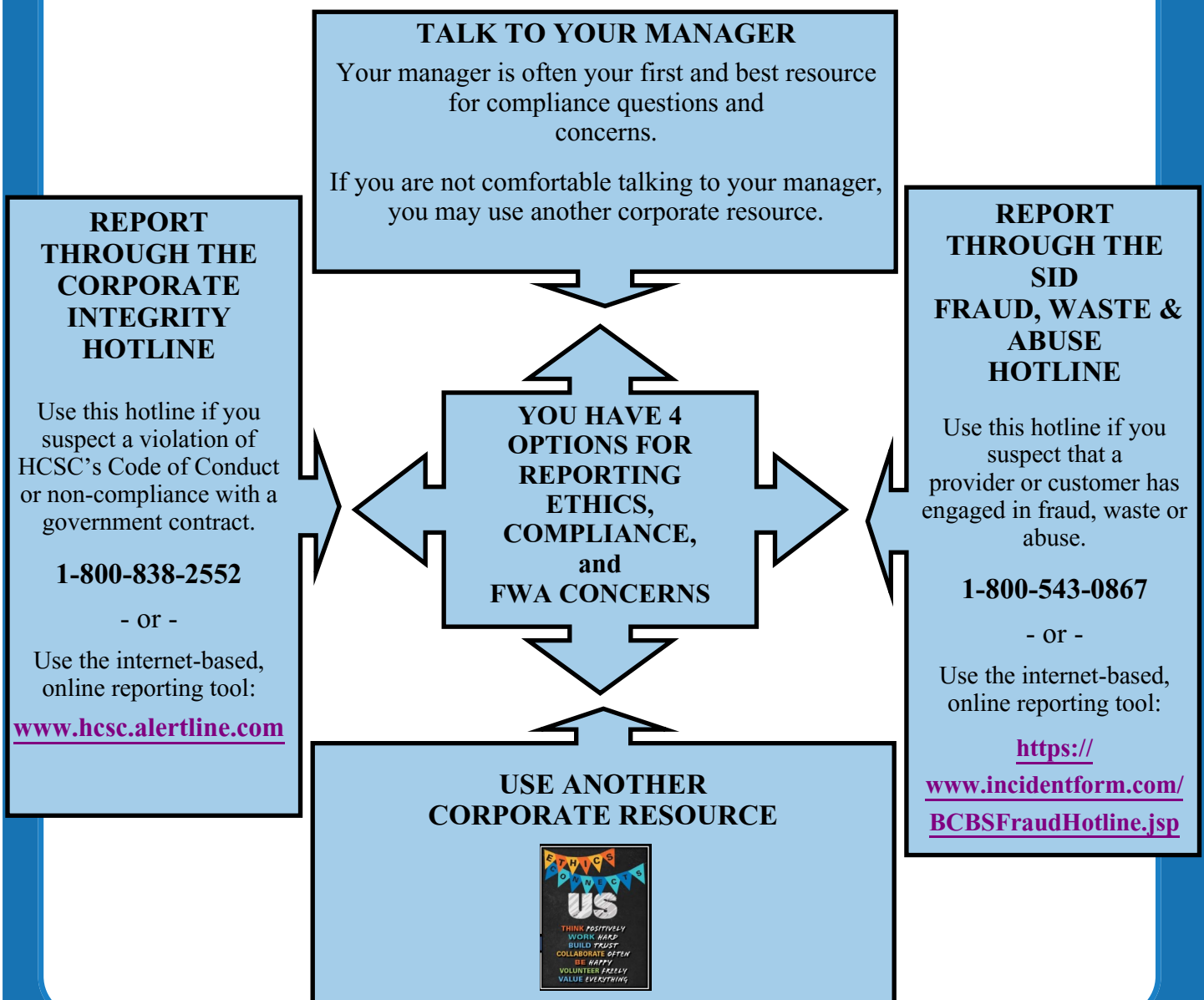
- Medicare Advantage
- Medicare Part D
- Medicaid

Integrity • Respect • Commitment • Excellence • Caring

HOW TO REPORT CONCERNS using the CORPORATE INTEGRITY HOTLINE or the

SPECIAL INVESTIGATIONS DEPARTMENT FRAUD, WASTE AND ABUSE HOTLINE

HCSC is committed to complying with all CMS requirements related to government contracts, including adopting and implementing effective lines of communication. HCSC's Corporate Integrity HOTLINE ensures that individuals can report concerns about non-compliant conduct and potential violations of the Code of Conduct without fear of retaliation. A separate hotline, the Special Investigations Department (SID) Fraud, Waste and Abuse (FWA) Hotline is also available for reporting suspected fraud, waste or abuse by a member or provider. Both hotlines are available 24 hours a day, 7 days a week, and you may always choose to remain anonymous when reporting a concern. HCSC's strong non-retaliation policy protects all individuals who participate in an investigation, including those reporting a concern in good faith as well as those who provide information relevant to the concern.



Corporate Integrity Hotline: 1-800-838-2552
Online Reporting Tool: www.hcsc.alertline.com

The Investigation Process

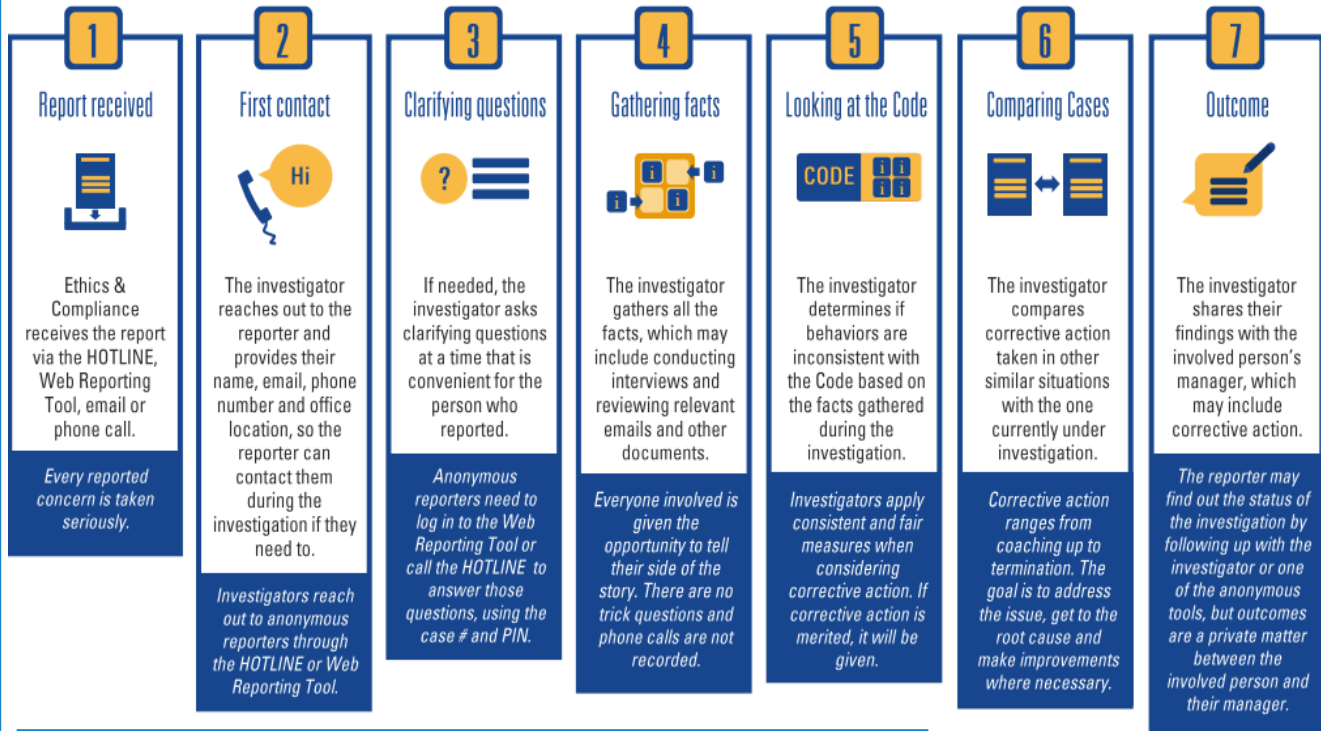
From beginning to end

★ All reported Ethics & Compliance concerns follow this investigative process. ★

REPORT

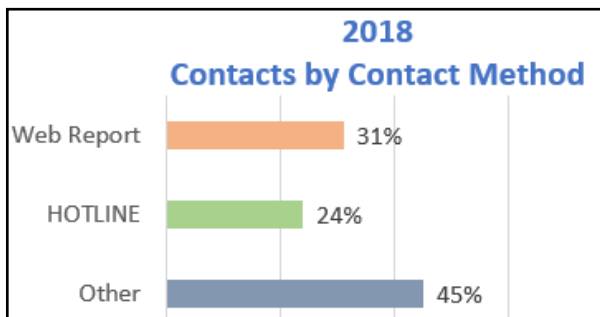
The process starts when an individual reports a concern.

If reported anonymously, save the case # and PIN so you can check on the status of the report and answer any questions investigators may have.



HOTLINE REPORTING BY THE NUMBERS

All contacts to the Ethics & Compliance Department (ECD) are received and investigated as appropriate. Some are routed to other areas for resolution. This includes HR, Privacy, Government Programs, Legal, or the business area. In 2018, 2065 contacts were made to the ECD team. While only a small percentage of contacts were related to our government programs contracts, each contact was investigated and resolved as appropriate.



WHAT TYPES OF CONCERNS WERE REPORTED IN 2018?

- ◆ **Work Environment: 31%**
- ◆ **Information and Guidance: 11%**
- ◆ **Government Programs related: approximately 2%**



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CORPORATE INTEGRITY HOTLINE**FAQ****Is there a separate HOTLINE for reporting government programs concerns?**

- ◆ No, there is only one HOTLINE for all HCSC corporate and government programs compliance concerns.

Is the HOTLINE staffed by an employee of HCSC?

- ◆ No, your call is answered by an external vendor.
- ◆ A report of your call is forwarded to the Ethics & Compliance Department (ECD) at HCSC, where it is reviewed by the Senior Manager of Investigations.
- ◆ Based on the nature of the concern, the report will be routed to the appropriate area for resolution.

Can I report my concerns anonymously?

- ◆ Yes, if you wish to remain anonymous, your name will not be included in the report sent to ECD.
- ◆ Even if you initially reported anonymously, you may choose to disclose your identity at any time during an investigation.
- ◆ ECD encourages you to provide your name, if possible, because it allows the investigations team to follow up directly with you to more quickly and efficiently resolve your concern.

Can I be retaliated against for reporting an issue of noncompliance?

- ◆ HCSC prohibits retaliation for good faith reporting.
- ◆ To be made in “good faith” you must have a reasonable belief that the information you provided is truthful; it does not mean that you must be correct about the potential violation.
- ◆ Consultants, temporary agency employees, providers, vendors, producers, and other entities with whom HCSC does business are protected by our policy of non-retaliation.
- ◆ Remember that HCSC’s Code requires you to report when an action or situation may be improper, including violating any laws, regulations, policies or the Code.
- ◆ Any person who violates HCSC’s non-retaliation policy will be subject to disciplinary action and could face termination of employment or contract/service agreement.

When can I report a problem or concern of ethical or compliance violations?

- ◆ The Corporate Integrity HOTLINE and the web reporting tool are available 24 hours a day, 7 days a week.

CONTACT INFORMATION

Email

hisccompliance@bcbsil.com

Hotline - Available 24/7
REPORT ANONYMOUSLY



Website

www.hisccompliance.com