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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 offers a reminder of the importance of remaining compliant in an evolving landscape. CMS and State Medicaid contracts require HCSC to establish and maintain an effective Government Programs Compliance Program to prevent, detect, report and correct issues of non-compliance.

All HCSC employees share the responsibility for ensuring compliance with all applicable federal and state standards. In this newsletter, we will review reminders everyone can use to help themselves and their team remain compliant during times of change.

As the Government Programs Compliance Officer, please know you can always contact me directly at 312-653-5110.

Kim Green

HCSC Government Programs Compliance Officer



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GPC

Resources:

NM Medicaid

Jeanene Kerestes, Senior Director

IL Medicaid

Yvonne Yang, Director

TX Medicaid

Kirstie Reck, Director

Medicare/MMAI

Kathleen Klein, Director

Debarment

Denise Anderson, Senior Manager

Consistent Compliance Foundations

HCSC currently serves more than 23 million people and remains poised for growth in 2025. As such, employees must remain responsive to developing business needs. Even if your team or business area is not directly affected, you may work regularly with one or more teams adapting to periods of change.

As HCSC grows and evolves, we remain committed to contract and regulatory requirement adherence.

How? Remember the Compliance basics remain unchanged!

* DETECTION * CORRECTION * PREVENTION * SUSTAINABLITY *

- Ensure Ethical Decision Making to include following all laws, rules, regulations, and contractual obligations. This responsibility belongs to each of us and directly supports our providers and members.
- Keep the "HCSC Code of Ethics and Conduct" and the Compliance Program
 as guides for good decision making.
- Support the HCSC **Non-Retaliation** policy and remember you are encouraged to **Speak Up Raise Up** your concerns.

Business Areas Continued Responsibilities

The foundations for each business area's compliance responsibilities remain unchanged and were covered in our 2024 newsletter series. These compliance activities may be impacted by change. *How?*

- Maintaining written Policies and Procedures may mean that in addition to the annual updates, other off-cycle updates may be required to account for changes in regulations or processes.
- 2. **Training and Education** is also required annually but during times of change, additional trainings or other communication sessions may be needed to keep current and learn new skills, new rules, or improve process adherence.
- 3. Routine Monitoring, Identification of Compliance Risks and Prompt Remediation of Compliance Issues are key business area responsibilities. Changes to requirements, regulations, or scope of work may necessitate updates to monitoring and audit activities and business documentation. Keeping these activities aligned during change is critical for identifying potential risks or issues of non-compliance and executing prompt remediation and corrective action.
- 4. Effective Lines of **Communication** with internal and external stakeholders become even more important during times of change. These communication channels are how changes are shared within teams and with business partners. This is also where we report concerns and collaborate to ensure compliance is maintained in the evolving landscape.



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Individuals Remain Key to Compliance Success

Your work remains critical to our shared success. What can you do?

Be sure to stay familiar with all updates to both corporate policies and procedures as well as those policies and procedures that directly govern your area and your role. You can review these at **Corporate Policies & Procedures**.

Promptly review any business communications to stay current with all changes to structure, scope, requirements, and regulations. This includes being attentive and timely on engaging in training provided by your area and completing all training requirements on **myLearning**.



Use the Code of Ethics and Compliance and the Compliance Program Charter as Your Compass

As changes continue you may find yourself questioning the right approach to new, uncharted situations. During these times, you can find guidance in **The Code** and the **Compliance Program Charter**. These resources can help you adhere to your responsibility for ensuring HCSC is compliant with all regulatory and contractual requirements.

Remember, each of us has an obligation to report violations. As our business landscape continues to evolve, if you think there is an issue of non-compliance, be empowered to speak up and raise it up. You can address concerns with your manager or reach out to the appropriate HCSC resources with any questions or concerns, including those listed in this newsletter and in our **Corporate Resources list**.

Measure Twice, Cut Once

This works for compliance too! It is always better to take the time to double check your decision to ensure it is in adherence with compliance requirements. Unvetted decisions may lead to unintended adverse impacts to our members, providers, and our organization.

In Summary

How We Remain in Compliance

Even during times of transformation, our compliance responsibilities remain unchanged.

You are fundamental to the success of the Compliance Program, your business area, and our organization through your efforts to:

- Understand relevant and up to date regulations,
- Regularly update, apply, and adhere to established policies and procedures,
- Align and engage with required compliance training,
- Monitor processes and adherence to all guidelines with regularity,
- Embrace HCSC core values and ethical behavior, and
- Support accountability across all business areas and levels!

Use this link to access previous Newsletters for additional compliance tips.