



Corporate Compliance

Compliance Officer Conversations



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A Message from Kim Green:

As the Corporate and Government Programs Compliance Officer, my goal for each Compliance Officer Conversation is to provide you with information about various compliance program initiatives and topics.

HCSC is a Plan Sponsor that administers Individual and Family Market (IFM), Large and Small Group plans, and Federal and State Government Programs, including:

- Medicare Advantage
- Special Needs Plans (SNPs)
- Medicare Prescription Drug Plan
- 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.

In this issue of our Compliance Officer Conversation, we will learn about our individual role in managing issues of non-compliance through effective prevention efforts.

As the Corporate and Government Programs Compliance Officer, please know you can always contact me directly.

Kim Green

HCSC Corporate and Government Programs Compliance Officer

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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 or Medicaid
 HCSC Corporate Integrity HOTLINE
1-800-838-2552

Integrity
 Respect
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Compliance Resources:

Corporate Compliance

Carrie O’Gara,
Executive Director

HCSC Medicare/Duals

Kathleen Klein, Senior Director
Marcie Parker, Director

Enterprise Medicaid, IFM and Group

Yvonne Yang, Senior Director

Debarment

Jeanene Kerestes,
Senior Director

Enterprise Policies and Procedures

Jenell Page, Director



Preventing Non-Compliance

This year, we’re going back to the basics and focusing on our responsibility to manage issues of non-compliance through effective prevention, detection and correction.

Did you know that most compliance issues don’t come from bad intent? They stem from:

- Following old habits instead of current policies or procedures
- Rushing
- Not asking questions
- Assuming “it’s probably fine”
- Taking shortcuts

Prevention is how we catch these moments before they become problems.

Your Role

To adhere to our contracts and reduce risk of non-performance, HCSC uses a **Three Lines approach**. Each Line has their specific responsibilities that are essential for our Company’s success.

Frontline operations (i.e., you) are our **First Line**. You are closest to the work, the members, the data, the decisions, and the risks. That proximity gives you the earliest visibility into what’s going right and what might go wrong. **Prevention starts with you** because you see the signals before everyone else.

Here are some preventative controls and proactive measures to implement in your daily work that can help reduce risk:

1 Understand and meet your job responsibilities and requirements.

- Use the [Code](#) and [corporate policies](#) as your guide. They are written to help you understand what to do and what not to do in your daily work.
- Know the requirements that apply to your business functions and stay updated on the latest regulations impacting your business area.
- Prioritize and complete all assigned training on time to ensure you are working with the latest information. See [2026 Annual Training Requirements](#).
- Have regular dialogue with your manager about your job responsibilities.

2 Follow approved processes.

- Know [where to find](#) policies and procedures.
- Ensure they accurately and clearly reflect the way your business area operates.
- Make the [Corporate Policy Manual](#) part of your workflow.
- Stay updated on changes and immediately implement them into your work.

All departments have policies and procedures outlining the rules relevant to their work. Together, these documents help business areas define its objectives and translate them into clear, actionable steps that lead to the outcomes the policy is designed to achieve.

Policies explain how you and your business area will meet the rules related to your function.

Procedures are clear, easily understood plans of action used in the operations of your business area to implement a policy.



Contact Us

Email

hisccompliance@bcbsil.com

24/7 Hotline

1-800-838-2552

Website

www.hisccompliance.com



Your Role in Prevention Continued

3 Notice early warning signs. They could look like:

- A process that feels clunky or unclear
- A process lacking appropriate checks and balances
- A request that feels rushed or unusual
- A shortcut that “everyone does”

4 Pause before you act. Ask yourself the following:

- Does this align with company policy or what we learned in training?
- What I be comfortable explaining this behavior or decision later?
- Is this the right *and* most effective way or the fastest way?
- Is this accurate, appropriate, secure and/or compliant?

5 Ask early, ask often. If you’re unsure about a rule, requirement or next step, reach out to your manager. Questions are meant to:

- Slow down risky decisions
- Surface gaps in understanding
- Create shared clarity
- Protect you and the company

No one is expected to know everything, but everyone is expected to speak up when there is uncertainty.

6 Document your decisions. Clear records help resolve issues quickly by:

- Demonstrating responsible action
- Showing intent and providing context
- Preventing confusion later

Compliance Knowledge Check

Q: What if I notice a step in a process was skipped?

A: Raise the concern with your manager right away. Speaking up is prevention and a responsibility that we all share.

While there may be some appropriate reasons to fast track or expedite a process in certain instances, it is important to ask the right questions to ensure that any needed exception policies were reviewed, that all documented steps were followed, and that the appropriate approvals were obtained.

Leadership feedback and approval is key at critical decision-making points. It is encouraged to always voice concerns, discuss the right next steps, confirm and document decisions, and ensure that established policies and procedures are being followed.