

# Government Programs

## Compliance Officer Newsletter



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Element II. Compliance Officer, Compliance Committee, and High-level Oversight:

- Compliance Program Oversight Structure
- Roles and Responsibilities

Element IV: Effective Lines of Communication

- Accessible and Confidential Reporting
- Non-retaliation Policy

Newsletter Summary

### 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 programs we administer. If we fail to meet those requirements, we are at risk for being subjected to various enforcement actions.

CMS and State Medicaid contracts require HCSC to establish and maintain an effective Government Programs Compliance Program to prevent, detect, and correct issues of non-compliance. The 2024 Government Programs Compliance Newsletters will focus on the core requirements that make up an effective Compliance Program, known as the “seven elements”.

- I. Written Policies, Procedures, and Standards of Conduct
- II. Compliance Officer, Compliance Committee, and High-level Oversight
- III. Effective Training and Education
- IV. Effective Lines of Communication
- V. Well-Publicized Disciplinary Standards
- VI. Effective System for Routine Monitoring and Identification of Compliance Risks
- VII. Procedures and System for Prompt Response to Compliance Issues

This newsletter provides an overview of Element II, “Compliance Officer, Compliance Committee, and High-level Oversight” and Element IV, “Effective Lines of Communication.”

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

## 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

HCSC Corporate Integrity HOTLINE 1-800-838-2552

**Integrity • Respect • Commitment • Excellence • Caring**



## GPC Resources:

### Enterprise Medicaid

Jeanene Kerestes,  
Senior Director

### NM Medicaid Compliance Officer

Hanna Padilla,  
Director

### IL Medicaid Compliance Officer

Yvonne Yang,  
Director

### TX Medicaid Compliance Officer

Kirstie Reck,  
Director

### Medicare/MMAI

Kathleen Klein,  
Director

### Debarment

Denise Anderson,  
Senior Manager

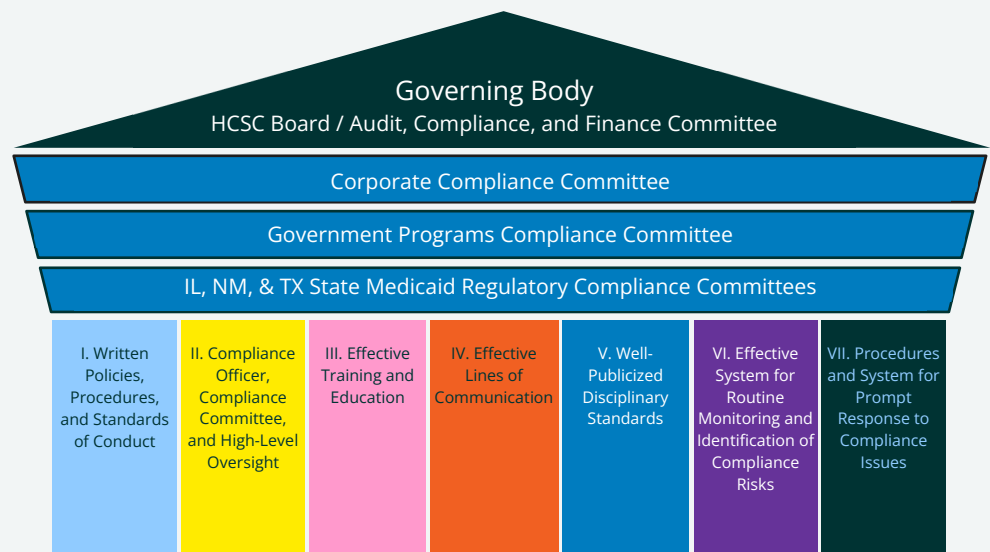


## Element II. Compliance Officer, Compliance Committee, and High-Level Oversight

At HCSC, Government Program Compliance (GPC) maintains the **Government Programs Compliance Officer** (GPCO) position, which is integrated into the organization, independent from business operations, and is given the credibility and authority to design and implement the Compliance Program for our Medicare, Medicaid and MMAI contracts.

GPC also maintains the Compliance Committee structure. The **Government Programs Compliance Committee** is chaired by the GPCO who at least quarterly, reports on the highest risk Medicare, MMAI and Medicaid issues to the **Corporate Compliance Committee**, which is chaired by the HCSC Chief Ethics, Compliance and Privacy Officer and the **Audit, Compliance and Finance Committee of the HCSC Board**.

The **IL, NM, & TX Medicaid Regulatory Compliance Committees** meet at least quarterly to discuss issues and remediation status. Each state **Medicaid Compliance Officer** chairs the meetings.



## II. Compliance Officer, Compliance Committee, and High-Level Oversight



## Element IV. Effective Lines of Communication

Open communication between the GPCO, members of our compliance committees, the board, governing bodies, and HCSC government business personnel is critical to the successful implementation of the HCSC Government Programs Compliance Program.

As mentioned in the **Element II overview**, our GPCO, compliance committees, and governing body function jointly to maintain forums for reporting and oversight of compliance program functions.

## IV. Effective Lines of Communication



## Contact Us

### Email

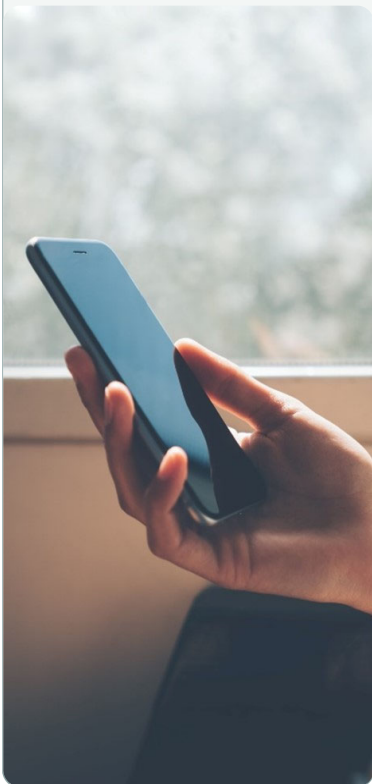
[hisccompliance@bcbsil.com](mailto:hisccompliance@bcbsil.com)

### 24/7 Hotline

1-800-838-2552

### Website

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



**Your role** in the government programs space involves **communicating with Compliance** to help HCSC identify, address, and reduce incidents of non-compliance. Examples include:

- Promptly responding to all GPC inquiries.
- Providing accurate and timely reporting for compliance committee requests for information.
- Reporting issues and risks of government programs non-compliance to the Government Programs Compliance Officer or GPC staff.
- Reviewing the [HCSC Corporate Resource](#) list for guidance on how, when, and where to report other concerns (includes **anonymous** options).

GPC also works with other teams, such as the Ethics and Compliance Department (ECD) and the Special Investigations Department (SID) to address and follow-up on any reported concerns that involve government programs. Together, our teams maintain reporting mechanisms that work to support **accessibility, confidentiality, and employee protections** reinforced in the HCSC [Non-Retaliation Policy](#).

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## In Summary

**WHO** is involved in activities supporting Elements II and IV of our Government Programs Compliance Program?

- Our Government Programs Compliance Officer, Compliance Committee reporting structure, Board members, and government programs employees, managers, and FDRs/subcontractors all play a role in supporting these functions.

**WHAT** do our regulators require of us?

- Government programs sponsors (such as HCSC) must designate a Compliance Officer, maintain a Compliance Committee reporting structure, and establish effective lines of communications, ensuring confidentiality, accessibility, and support for reporting responsibilities.

**WHY** is this important (in addition to meeting requirements)?

- It is critical that HCSC meets our reporting responsibilities by fostering a safe environment for employees to elevate compliance concerns/issues, emphasizing **non-retaliation and non-intimidation**, and keeping channels between all members of the organization, governing bodies, and compliance teams open.

**HOW** do we accomplish this?

- In addition to the resources discussed above and provided in the [HCSC Corporate Resource](#) list, HCSC maintains annual Ethics, Compliance & Privacy training, quick ways to connect with our Compliance Teams via the [Ethics Exchange](#) Viva Engage page, a [Guide for Speaking Up](#) and promoting ethical and compliant behavior, and frequent reminders in Blue News highlighting ethics and compliance topics relevant to our Compliance Program and responsibilities – to name a few!

**Look out for our next GPCO Newsletter in Q3 to learn more about Elements III. Training & Education, and V. Well-Publicized Disciplinary Standards**