



Corporate Compliance

Compliance Officer Conversations



In this issue:

Training and Education

- Why Is It Important?
- Types of Training and Education
- Compliance Check
- What We Do

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
- Illinois Medicare-Medicaid Alignment Initiative (MMAI)
- 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.

Whether you're our newest or most tenured employee, training and education are foundational to the work we do every day. It helps us understand and apply what's expected of us so that we can be successful in our roles, create a positive workplace culture, protect the company's reputation and reduce risks. It empowers us all to work "Better Together" by acting with integrity and accountability.

In this issue of our Compliance Officer Conversation, we'll review the importance of training and education and the responsibilities all HCSC employees have in meeting this requirement.

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

Kim Green

HCSC Corporate and 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 or Medicaid

HCSC Corporate Integrity HOTLINE
1-800-838-2552

Integrity
Respect
Commitment
Excellence
Caring



Compliance Resources:

Corporate Compliance

Carrie O'Gara,
Executive Director

HCSC Cigna Medicare/Duals

Lou Crognale,
Executive Director

HCSC Medicare/Duals

Kathleen Klein, Director

Enterprise Medicaid

Jeanene Kerestes,
Senior Director

IL Medicaid

Compliance Officer
Yvonne Yang, Director

NM Medicaid

Compliance Officer
Hanna Padilla, Director

TX Medicaid

Compliance Officer
Kirstie Reck, Director

Regulatory Compliance – IFM and Group

Chris Breitzman, Director

Debarment

Denise Anderson,
Senior Manager



Training and Education: Why is it important?

All HCSC employees must complete required compliance trainings and any job-specific training relevant to their role in a **timely manner**.



The Cost of Non-Completion

Failing to uphold our obligations and complete our requirements (such as training) on time could have **serious consequences** to the Company and to you individually. These could include audit findings, fines, reputational damage or disciplinary action, up to and including termination of employment.

Compliance training and education empower us to:

- **Meet requirements and maintain compliance**
CMS and other state regulators require HCSC to establish, implement, and provide effective training and education on general compliance responsibilities and fraud, waste, and abuse (FWA). This training must occur within 90 days of hiring and annually thereafter.
- **Identify and remediate issues to reduce risk**
When we are aware of the rules that govern our business, we are better equipped to report known or suspected instances of non-compliance and can assist in implementing effective remediation activities.
- **Ensure audit readiness**
Did you know that training records can be pulled in an audit? If an employee fails to complete their required compliance training or completes it after the due date, this could be a finding for which our regulators can require corrective action.

Other Types of Training and Education

Annual and Mandatory Requirements

- General compliance and FWA trainings, designed to address FWA and ethical concerns while meeting Compliance Program requirements, include:
 - Required training
 - Conflict of Interest form
 - Certification forms pertaining to training you attend
 - Mandated requirements you fulfill and/or the work you produce or oversee

Job-Specific

- Job-specific training teaches employees the skills, knowledge, and competencies that are needed to perform their specific job within their department.
- Training also means being aware of what applies to the work you do and staying on top of regulatory and sub-regulatory guidance. Additional trainings, communications, and/or working sessions may be needed throughout the year and during times of change to keep current and learn new skills, new rules, or improve process adherence.



Contact Us

Email

hisccompliance@bcbsil.com

24/7 Hotline

1-800-838-2552

Website

www.Hiscompliance.com



- All employees who work on government programs are required to receive job-specific training at initial onboarding and continually throughout employment.
- Proper training helps us provide a consistent and quality experience for our members and each other by helping us stay knowledgeable, professional, and doing what's right every day.

Off-Cycle Topics

- Contract management and oversight teams may provide training to operational business areas to review upcoming contract changes or regulator direction.
- Federal and state regulatory bodies may require MCO or delegated entity employees working on certain programs to complete specific trainings. They often require the completion of attestations or similar documentation to demonstrate that all relevant employees have completed and/or reviewed the training content.
- Employer group contracts will often also require additional trainings to ensure employees overseeing specific contract functions are up to date on requirements.

Compliance Check

Q: I am going to be out of town when the ethics and compliance training is due. Can I get an exception if I complete it after the due date?

A: No. Completing training on time is a Compliance Program requirement. Workers have several months to complete training. Unless a worker is on extended leave of absence, exceptions are not given. Missing training deadlines by any amount of time creates long-term risks for the company. Auditors can ask for previous training records – any missed deadlines could result in findings.

See Code of Ethics & Conduct (1.2 Know Your Responsibilities, 1.3 Know Your Responsibilities as Leaders, 4.2 Cooperating with the Government)

What We Do

- **Be aware** of due dates.
- **Prioritize and complete** all required certifications, forms and trainings **on-time**.
- **Stay updated** on the latest regulations impacting your business area.
- **Ask questions** and seek clarity when needed.

Managers: *When it comes to training and education, what is your responsibility?* As a manager, it is your responsibility to ensure your employees receive and complete training in a timely manner.

- **Prioritize early completion** of training and monitor assignment completions of all direct reports to ensure assignments are completed within the specified time frame.
- **Discuss learnings** with your team to emphasize its importance.
- **Regularly model use of the Code**, policies, procedures and resources. Ensure your team knows how to locate these resources.
- **Train your team** on any changes and check frequently for understanding.

Helpful Tip: Consider setting **earlier internal deadlines** and discuss training completion during **mid-year reviews**.