



Corporate Compliance

Compliance Officer Conversations



In this issue:

Detecting Non-Compliance

Your Role

Building a Monitoring Process

Issue Identification

Reporting Methods

Compliance Check

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 Managed Care Organization (MCO) that administers:

- Individual and Family Market (IFM)
- Group Commercial
- Large and Small Group Medicare Plans
- Medicare Advantage (MA)
- Medicare Prescription Drug Plan (MAPD)
- Medicaid
- Special Needs Plans (SNPs)

As a Managed Care Organization, 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 may be subject to various regulatory actions.

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

Volume XXVIII

Issue 2

June 2026

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 Functions

Jeneane Kerestes,
Executive Director

HCSC Medicare/Duals

Kathleen Klein, Senior Director
Marcie Parker, Director

Enterprise Medicaid, IFM and Group

Yvonne Yang, Senior Director

Enterprise Policies and Procedures

Jenell Page, Director



Detecting Non-Compliance

As mentioned in our [previous issue](#), each business area is responsible for managing issues of non-compliance through effective prevention, detection and correction efforts.

Monitoring is one of the most effective ways to **detect** potential compliance issues. In fact, routine monitoring is one of the [seven elements of an effective compliance program](#).

When our organization actively engages in monitoring, critical analysis of the results allows us to identify and correct issues that might otherwise go unnoticed. If an existing business practice does not align with applicable rules or regulations, monitoring puts us in a proactive position to address and resolve the underlying issues.

When we actively engage in monitoring, critical analysis of the results allows us to identify and correct issues that might otherwise go unnoticed. If an existing business practice does not align with applicable rules or regulations, monitoring puts us in a proactive position to address and resolve the underlying issues.

Your Role

Here's what you can do to reduce risk and detect issues of non-compliance:

- Routinely monitor data and documentation for compliance risks or trends.
- Evaluate and analyze end-to-end business processes and regularly evaluate and update policies and procedures to ensure compliance.
- Identify any gaps, risks or issues of non-compliance.
- Review the performance and reporting of delegated entities and subcontractors.
- Immediately alert the [Corporate Compliance Department](#) of significant identified risks or issues of non-compliance. For Government Programs, also alert the appropriate management teams for issue tracking and escalation.

Building a Monitoring Process

Each business area is responsible for day-to-day compliance and must conduct their own monitoring activities.

1. **Identify what activity or process to monitor.**
2. **Understand the rules and applicable requirements** that govern the identified activity (e.g., Centers for Medicaid & Medicare Services rules and guidance, Health Plan Management System Notices, State Medicaid Contracts, Office of Inspector General, etc.)
3. **Decide how to monitor.** Choose a method such as:
 - a. Reviewing data, clinical reports, marketing or member materials
 - b. Review samples, either targeted or end to end review
 - c. Requesting information from delegates and subcontractors
4. **Report the results.** Share findings using a chart, graph, spreadsheet, report, or email as appropriate.
 - a. Share results with your leadership so they are aware and can act on remediating the issue.
5. **Address issues.** Create a remediation plan to correct any gaps or deficiencies.
 - a. When an issue is outside of normal operations, these are considered issues of non-compliance and must be reported to the appropriate management team.
6. **Document completion.** Record when and how remediation actions were completed.



Contact Us

Email

hisccompliance@bcbsil.com

24/7 Hotline

1-800-838-2552

Website

www.hisccompliance.com



Issue Identification

Due to the size and complexity of our business, issues can happen. Our organizational goal is to identify these issues internally as early as possible, remediate and stop the issue and develop corrective actions to prevent future recurrence.

What to Report: Any identified action or outcome that is suspected or known to be non-compliant with regulatory and contractual requirements should be reported to your leadership. Depending on the type of issue and risk, your leadership can determine next steps for escalation through the appropriate management team or by contacting Compliance.

According to the Code of Ethics and Conduct, we are all responsible for speaking up and reporting known or suspected compliance issues. When you speak up, it provides HCSC with the opportunity to take corrective steps.

Your Compliance Reporting Options

At HCSC, there is a system in place to promptly respond to, investigate, and correct compliance issues quickly and thoroughly when they are identified.

How to Speak Up:

1. Refer to internal policies and procedures;
2. Answer the questions in a Guide to Speaking Up to get your thoughts in order;
3. Identify the specific requirement(s) that are not being met or are at risk of not being met;
4. Notify your supervisor, a higher-level manager, or contact one of our Corporate Resources or,
5. Report concerns confidentially, 24/7, using the Web Reporting Tool or the **Corporate Compliance HOTLINE (800-838-2552)**, Both options are available **24/7**, including corporate holidays.

No tolerance for retaliation: HCSC takes all reports seriously and **follows a strong process** for investigating and addressing each issue.

Thank you: Speaking up means you care about doing the right thing and holding yourself — and HCSC — to a higher standard.

Compliance Knowledge Check

Q: I have an issue. Who do I report it to?

A: Use the Guide for Speaking Up to get your thoughts in order. When you're ready, you can choose to speak with one of our many reporting options. While your direct manager is your first and best resource, you can also speak with a higher-level manager, ask someone a question from the Corporate Resource List or use the Web Reporting Tool to submit or follow up on reports in writing. You may also call the **Corporate Compliance Hotline at 1-800-838-2552** for guidance or to report concerns.