

Government Programs

Compliance Officer Newsletter

A Message from Kim Green:

My goal for each Government Programs Compliance (GPC) 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 contracts 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 VI. “Routine Monitoring and Identification of Compliance Risks” and Element VII. “Prompt Response to Compliance Issues.”

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 or Medicaid

HCSC Corporate Integrity HOTLINE
1-800-838-2552

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In this issue:

Element VI. Effective System for Routine Monitoring and Identification of Compliance Risks

Element VII. Procedures and System for Prompt Response to Compliance Issues

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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 VI. Effective System for Routine Monitoring and Identification of Compliance Risks

To conform with the requirements under Element VI, HCSC has established an effective system for routine monitoring and identification of compliance risks. The system includes internal monitoring and audits and, as appropriate, external audits, to evaluate HCSC's compliance with CMS and State Medicaid requirements and the overall effectiveness of the Compliance Program. This includes HCSC's First Tier, Downstream, or Related (FDR) entities and subcontractors.

HCSC uses the [Lines of Defense](#) approach to manage the risks associated with the heavily regulated government programs within our matrixed organization.

VI. Effective System for Routine Monitoring and Identification of Compliance Risks



- **What Is Monitoring?**
Monitoring involves reviewing processes, data, and documents to verify adherence to Federal and State requirements. As a key component of business performance and Compliance Program administration, monitoring helps ensure HCSC's Government Programs (Medicare, Medicaid, and MMAI) are performing in accordance with all applicable laws, regulations, and guidelines.
- **Types of Monitoring**
 - **Routine Monitoring:** The day-to-day operational monitoring as part of standard operations performed by the business area (*First Line of Defense*).
 - **Targeted Monitoring:** Risk-based monitoring activities performed by the Compliance Department to test specific, identified risks of non-compliance (*Second Line of Defense*).
- **Why is Monitoring Important?**
 - Proactive identification of issues and risks of non-compliance.
 - Requirement of the HCSC Compliance Program.
 - Mandatory element in Medicare and Medicaid Contracts to ensure contractual requirements are met.
- **What is Your Role in Monitoring?**
 - Understand the rules and regulations related to your job function.
 - Routinely review data and documentation.
 - Evaluate and analyze end-to-end processes to ensure the process is compliant.
 - Identify any risks or issues of non-compliance.
 - Review the performance and reporting of FDRs and subcontractors.
 - Immediately alert the Compliance Department of significant identified risks or issues of non-compliance.

Each business area is responsible for the compliance of their operations and must conduct their own monitoring activities.

Contact Us

Email

hisccompliance@bcbsil.com

24/7 Hotline

1-800-838-2552

Website

www.hisccompliance.com



• Identification of Compliance Risks

Through routine monitoring activities, the **First Line of Defense will often be the first to identify issues or risks of non-compliance**. Instances may also be identified through other avenues, such as operational and audit activities, Corporate Integrity or Fraud Hotline submissions, reports from cross-functional business areas, or regulator inquiries.

Element VII. Procedures and System for Prompt Response to Compliance Issues

At HCSC, there is a system in place to promptly respond to, investigate, and correct compliance issues quickly and thoroughly when they are identified. The business (First Line of Defense) is heavily involved in ensuring prompt responses to risks and issues. If you identify a risk or issue, it is important to understand how and when to bring in appropriate management and corporate resources to help mitigate the issue. Here are some things you can do to act

- Notify your manager that you have identified an issue or risk.
- Determine the facts, with relevant dates.
- Identify the applicable regulatory requirements and the specific requirement(s) that are not being met or are at risk.
- Assess impacts to members, individuals, and/or departments.
- Conduct a full root cause analysis.
- Ensure appropriate corrective actions are taken, such as:
 - Member remediation
 - Training, coaching, and/or disciplinary action
 - Documentation updates and/or process changes
 - Escalation to leadership if not progressing in a timely fashion
- Report issues of non-compliance through the appropriate mechanisms which may include the Compliance Department.

VII. Procedures and System for Prompt Response to Compliance Issues



In Summary

Each of us plays a role in understanding and adopting the Seven Elements. Execution of these activities is essential in reinforcing a strong culture of ethics and compliance throughout HCSC.

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
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Use [this link](#) to access the Q1-Q4 2024 Newsletters for details on the Seven Elements.