



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
- 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.

In this issue of our Compliance Officer Conversation, we will learn how regular and effective communication helps us meet our responsibilities, enables risk management, and creates a culture of ethics and integrity at HCSC.

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
Commitment
Excellence
Caring



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



Compliance Communications

Communication is the cornerstone of our Compliance Program.

It helps empower each employee to understand their responsibilities, adhere to evolving standards, feel supported when asking questions, and ensures that all individuals know how to report concerns without fear of retaliation.

Additionally, it fosters a culture where compliance is highly valued and embedded into daily business operations, reducing risks of non-compliance and enabling us to best serve our members.

Why is communication important?

- **Clearly defines roles and responsibilities** to ensure employees understand company policies, regulatory and contractual requirements.
- **Fosters a positive compliance culture** where ethical behavior and policy adherence is a prioritized responsibility.
- **Manages risk** by keeping employees informed and creating clear channels for reporting known and potential risk or issues of non-compliance.
- **Supports audit readiness efforts** by encouraging needed coordination and collaboration.

Our regulators require that Government programs sponsors (such as HCSC) establish **effective lines of communications**, ensuring confidentiality, accessibility, and support for reporting responsibilities. By regularly communicating, we not only meet our responsibilities but are able to document and demonstrate proactive compliance.

How We Communicate:



Compliance Updates

Sharing key compliance guidance is essential for workers to understand evolving requirements and their specific roles in upholding them.

Look in HCSC News for quarterly policy and procedure updates, videos summarizing annual changes to the Code, and messages about topics relevant to our Compliance Program.



Reporting Reminders

Consistent reminders on how to prevent, identify, and report risks allows for early detection, proper remediation and corrective action, and proactive mitigation of developing risks or issues. HCSC regularly shares resources for speaking up (Guide for Speaking Up and Corporate Resource List) and provides secure and anonymous ways to report concerns using the Web Reporting Tool and Corporate Compliance HOTLINE (800-838-2552.)



Contact Us

Email

hiscscompliance@bcbsil.com

24/7 Hotline

1-800-838-2552

Website

www.hiscscompliance.com



Annual Initiatives

It takes all of us working together to create an environment and company culture that reflects our core values and demonstrates our commitment to contractual and ethical responsibilities. Learn more by participating in our annual [Ethics and Compliance Week](#) and [Fight Fraud Week](#) events.



Leadership Updates

At HCSC, leadership models ethical decision-making (see recent [Ethical Leadership Spotlight](#)) and reinforces our culture of compliance and commitment to supporting the Compliance Program in a variety of ways. Look for this quarterly Compliance Officer Conversations (see previous issues), updates from HCSC's Chief Ethics & Compliance Officer, Jill Wolowitz, and hear directly from your manager as they facilitate the annual [Ethics Connects Us Conversation](#) and discuss compliance messages throughout the year.



Learning and Knowledge Retention Activities

Through HCSC's annual training, real-life scenarios, and interactive activities (see latest [Investigation Diary](#)), employees can better understand and remember compliance information, ensuring it's applied correctly in their daily work.



Open Forums

To stay updated or quickly connect with our Compliance teams, consider joining the [Ethics Exchange community](#) via Viva Engage, visit [Corporate Compliance](#) or [email us directly](#).

Compliance Check

Q: My business teams must check that operations are meeting regulatory and contractual requirements. Are there any additional actions our teams should take to ensure effective communication in support of our Compliance Program?

A: HCSC business areas often receive direction or guidance from federal and state regulatory bodies. It is critical for these business areas to:

- **Develop formal processes to manage the inventory** of regulations that apply to your business operations.
- **Educate and share information** with business partners, senior leadership, and the Compliance Department.
- Work with key stakeholders and business partners to **implement needed changes timely**.
- Support efforts around the **investigation of risks and issues of non-compliance**.
- **Communicate promptly and clearly** with the Compliance Department for needed reporting.