



Government  
Programs  
Compliance

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# GOVERNMENT PROGRAMS

## Compliance Officer Newsletter

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


In our previous newsletter, we reviewed the importance of having robust issue management processes for government programs business areas. To effectively respond to issues as they arise, business areas supporting government programs must seek out and address the root cause of an issue in order to respond and minimize impacts and the chance of reoccurrence. In this volume we highlight root cause considerations, elements, and examples of root cause analysis.

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

**HCSC Corporate Integrity HOTLINE 1-800-838-2552**



**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

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## GPC Resources:

### NM Medicaid

Jeanene Kerestes,  
Senior Director

### IL Medicaid

Yvonne Yang,  
Director

### TX Medicaid

Kirstie Reck,  
Director

### Medicare/MMAI

Kathleen Klein,  
Director

### Debarment

Denise Anderson,  
Senior Manager



## Root Cause Analysis (RCA)

Root cause analysis is a method of investigation that is often used to seek out the **true underlying cause** of an issue to better understand the problem: **why** it occurred, **what** can be done to address the immediate harm caused by the issue (remediation), and **what** can be done moving forward to prevent reoccurrence (corrective action).



The root cause is the true underlying cause of an issue.



Root cause is **not** a restatement of the issue or timeline of events that occurred leading to the outcome.

## Root Cause Considerations

Root cause can come from a variety of sources and can be impacted by different contributing factors. In particular, and as covered in a previous GPCO newsletter (Q3 2022), root causes often tie back to 3 common areas – people, processes, and policy. Things to consider when looking at each area include:



### PEOPLE

Awareness of **personnel impacts or changes** and other contributing factors are key considerations when getting started on any RCA. For example, if there is an organizational change and work is not properly transitioned or new staff are not properly trained on regulatory requirements, this could be a root cause of an issue of non-compliance.



### PROCESS

Evaluate whether currently processes adhere to **contract and regulatory standards**. Ensuring **accountability across process steps** helps to **mitigate risks before they become issues**. Broken or siloed processes that are missing required steps can lead to gaps that create issues of non-compliance (e.g., failure to develop end-to-end processes that consider all key stakeholder departments.)



### POLICY

Assess whether the process is **completely and clearly documented** in a manner that articulates what the requirement demands. Missing or incomplete documentation that doesn't include all operational departments can lead to issues of non-compliance.

GPC

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## Contact Us

### Email

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



### 24/7 Hotline

1-800-838-2552

**REPORT  
ANONYMOUSLY**



### Website

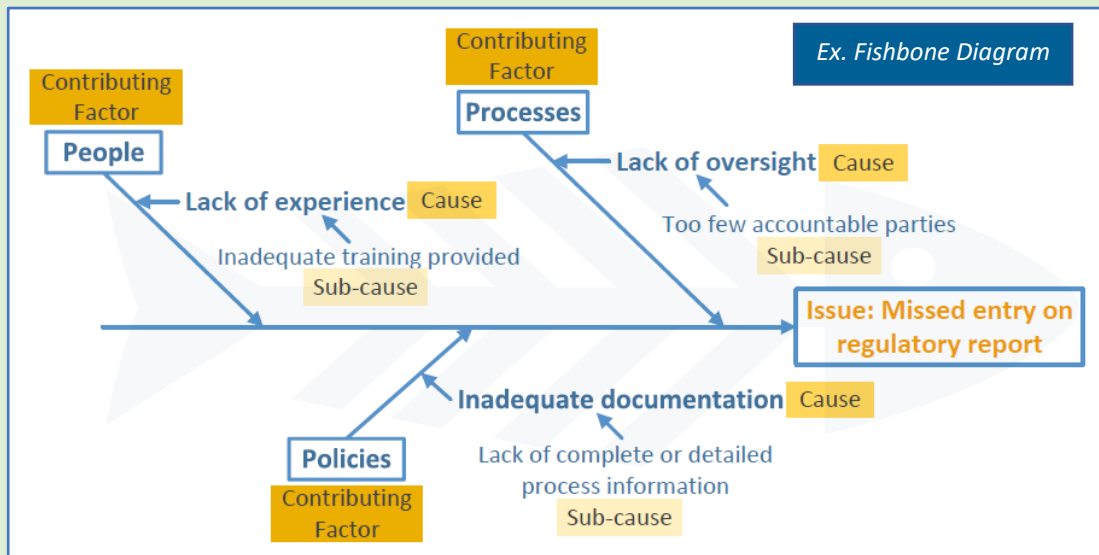
[www.hisccompliance.com](http://www.hisccompliance.com)



## RCA Example

A common RCA method is known as an *Ishikawa "Fishbone" Diagram*<sup>1</sup>. A Fishbone diagram can be used to brainstorm what elements may have contributed to the problem to assess different factors as you work towards the **root cause**. It allows teams to jointly assess some of the considerations outlined above to drill down to the root cause of the issue (*see example below*).

<sup>1</sup>More information about Fishbone Diagrams and their use can be found at the American Society for Quality's website (<https://asq.org/quality-resources/fishbone>)



Once root cause is determined, develop the appropriate solution for short term (immediate) remediation and long-term corrective action (prevent reoccurrence).

### ① ISSUE:

There was a missed entry on a report that was sent to a regulator.

### ② ROOT CAUSE ANALYSIS:

The individual who usually reviews and submits the report was on PTO, so a colleague covered the submission. It was found that quality checks for accuracy and completeness were not a documented part of the responsible party's pre-submission process.

### ③ REMEDIATION:

A review of the data was conducted, and a corrected report was sent to the regulator, ensuring the final submission was accurate.

### ④ CORRECTIVE ACTION:

The responsible department's SOPs were updated to include quality checks to ensure anyone covering this activity performs the appropriate reviews.



## Root Cause and Your Role

*RCA uncovers both the 'what' and 'why' behind problems to inform corrective actions. Corrective actions addressing root causes offer a preventative approach to tackling issues at their source and avoiding reoccurrence.*

### ① RECOGNIZE:

Evaluate impacts. Investigate what initiated a particular event rather than merely tackling its symptoms.

### ② RECTIFY:

Create restorative process measures. RCA helps our organization study events that resulted in undesired outcomes and identify strategies to reduce future error and improve member experience.

### ③ REPLICATE:

Monitor, document and verify results. Chosen strategies must be monitored for effectiveness to prevent similar issues from occurring at a later time.

## In Summary...

- Root Cause Analysis (RCA) is an important component of issue resolution and corrective action activities that aid in more **targeted solutions** aimed at **preventing issue reoccurrence**.
- Stakeholder engagement, coordination, and cooperation is important for confirming that **all details and facts** about the issue are **accurately documented, reported, and applied** when conducting RCA, remediation, and corrective action activities.
- Understanding the **regulatory and contractual requirements** impacting the line of business helps to keep teams focused on assessing gaps related to **processes** and our P&Ps, SOPs, etc.
- Take away: the **root cause** of any issue **is quickly identified**, a **targeted solution is developed and acted upon**, and **results are documented and monitored** to avoid reoccurrence.

