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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.

This newsletter edition will highlight debarment screening. This may be the first time you have heard about debarment screening, but it is being done every day here at HCSC and it touches all lines of business and all parts of the organization. This screening ensures we are compliant with federal and state regulations. But most importantly, by doing this we are providing our members with service they can feel confident about.

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:

Enterprise

Medicaid/Debarment

Melissa Lupella, Senior Director

NM Medicaid

Jeanene Kerestes, Senior Director

IL Medicaid

Ryan Lipinski, Director

TX Medicaid

Kirstie Reck, Director

Medicare/MMAI

Shawna Romero, Director

What is Debarment Screening?

Federal/state laws and regulations prohibit health care organizations like HCSC from knowingly having certain types of relationships with individuals and entities who are debarred under federal regulations.

- What does “debarment” mean?
 - An individual or entity is “debarred” if they are suspended, excluded, or otherwise not allowed to perform certain professional activities (e.g. practice medicine, administrative services, sales) due to a violation of a regulation, law, or contract requirement, as determined by a regulatory agency (e.g. HHS, CMS, or state Medicaid).
- What does “screening” mean here?
 - To make sure we are not allowing debarred, sanctioned, or excluded individuals and entities to engage with HCSC, we use a Lexis Nexis platform called Bridger to identify them.
 - The names of all new and existing individuals and entities engaged with HCSC are loaded into Bridger to identify potential violations.
 - Any names not automatically cleared by Bridger are manually researched by the GPC Debarment team.
 - If the individual or entity is cleared, they remain active in our systems. If the individual or entity is found to be debarred, sanctioned, or excluded by one or more regulatory agency, then the relationship or contract will be terminated, and they will be deactivated in our systems.

Who Gets Screened?

Everyone associated with HCSC gets screened initially and then at least monthly thereafter.

- Providers (individuals, groups, and facilities)
- Vendors & suppliers
- Delegated entities
- Producers (sales reps)
- Employees, contractors, temporary workers
- Members & beneficiaries
- Board members



Contact Us

Email

hiscompliance@bcbsil.com

24/7 Hotline

1-800-838-2552

REPORT
ANONYMOUSLY

Website

www.hiscompliance.com

Why is It Important to Screen?

Failure to screen, or to screen regularly, puts us at risk to be fined/sanctioned, subjected to additional regulatory auditing, and/or to lose a plan or contract.

- For example, CMS spot checks our provider directory to look for debarred providers and facilities without notice to us, and External Quality Review teams perform annual audits that include debarment checking.
- If debarred providers or facilities are found in our networks by the regulatory agencies, it results in an issuance of a notice or non-compliance or an audit finding to HCSC and puts us at risk of further discipline.
- Being vigilant in screening regularly keeps our provider networks up to date, and our members can be confident they are being served by compliant providers.

How Does This Affect Me?

Even if you are not performing screenings personally, someone in your division is involved in this activity.

- Debarment screening takes place across all lines of business.
 - Commercial
 - Retail
 - Medicare (MAPD & PDP)
 - Medicare Advantage/MMAI/DSNP
 - Medicaid
- Screening touches all areas of the organization. GPC oversees the automated screening processes and research of potential violations, but several business areas have their own screening procedures and GPC receives data from source systems across the entire enterprise. Here are a few areas you might not have thought about where screening can take place
 - Corporate Security
 - HR & Workforce Services
 - SID
 - Finance & Treasury
 - Procurement & Market Research
 - Network & Credentialing
 - Sales
- For more information or if you have a debarment concern or question, contact: crystal_brotski@bcbsil.com or gpcdebarment@bcbsil.com