

Government Programs

Compliance Officer Newsletter



In this issue:

Overview of the Seven Elements of an Effective Compliance Program:

- What are they?
- Why are they important?

Element I. Written Policies, Procedures, and Standards of Conduct:

- HCSC Compliance Program Charter and Appendices
- Takeaways for Government Programs employees
- In Summary: Questions to ask yourself regarding your Departmental Policies and Procedures

Volume XXI

Issue 1

March 2024

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.

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 the seven elements and dives further into element I. on Written Policies, Procedures, and Standards of Conduct.

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
- Medicaid

HCSC Corporate Integrity HOTLINE 1-800-838-2552

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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

Overview of the Seven Elements

The following seven elements must be implemented and maintained across the organization to make up an effective Government Programs Compliance Program:



Each one of the elements is essential and acts as a roadmap to establish, maintain, and reinforce compliance with government programs contracts and regulations and fosters a culture of compliance and ethics throughout HCSC.

While Government Programs Compliance administers the HCSC Government Programs Compliance Program, **each business area owns the responsibility to understand and operate in accordance with these seven elements based off each contract and regulatory requirement that relates to their function.**

Element I. Written Policies, Procedures, and Standards of Conduct

The HCSC Government Programs Compliance Program must include written policies, procedures, and standards of conduct. Policies, procedures, and standards of conduct demonstrate HCSC's commitment to comply with all federal and state standards and describe the overarching principles of HCSC's operating model.

The [HCSC Compliance Program Charter](#) is the overall blueprint for compliance and includes a specific Government Programs section that outlines additional obligations and responsibilities for individuals working in Government Programs. Also included within the Charter's Appendix are:

- [Code of Ethics and Conduct](#) which details the standards of behavior, and the policies and regulations employees must uphold (acts as HCSC's Standard of Conduct).
- **Government Programs Compliance Policies** which outline compliance expectations and requirements for employees working in Government Programs, including guidance on investigating, reporting, and resolving compliance issues with government contract holders and appropriate compliance personnel.

Be sure to check out the other key documents included within the Charter's Appendix as well as the [Ethics & Compliance SharePoint](#) site or the [HISC Compliance](#) website.

I. Written Policies, Procedures, and Standards of Conduct



Contact Us

Email

hisccompliance@bcbsil.com

24/7 Hotline

1-800-838-2552

Website

www.hisccompliance.com

Takeaways

Understanding and adhering to policies, procedures, and standards of conduct is **everyone's responsibility** from top to bottom at HCSC. Each Government Programs employee is responsible for:

1

Complying with the **HCSC Compliance Program Charter** (including the Government Programs section), HCSC Code of Ethics and Conduct, Government Programs Compliance Policies, and any other applicable policies and procedures.

2

Understanding and adhering to all applicable **contractual and regulatory** requirements.

→ Check out the [GPC Government Contracts Newsletter](#) for a refresher.

3

Maintaining departmental policies and procedures that address the applicable contractual and regulatory requirements for their functional area.

Government Programs employees are a part of the First Line of Defense as outlined in [GPC's Lines of Defense Newsletter](#). The First Line of Defense **must** understand and adhere to all applicable contractual obligations described within their federal and state contracts and **ensure the department maintains written policies and procedures**. These documents must **detail how each business operates and complies with the respective contractual and regulatory requirements**. Departmental policies and procedures help to create structure and outline expectations for management to ensure that employees understand and meet regulatory requirements.

In Summary Ask Yourself:

Are my *departmental* policies and procedures...

- Rooted in relevant regulatory guidance and requirements?
- Being evaluated to determine if there are any gaps in documented processes based on applicable guidance and requirements?
- Comprehensive and cover all applicable rules for my department?
- Clearly demonstrating the functions that I perform and why?
- Do procedures outline the steps for performing the functions outlined in policies?
- Revised annually and more frequently as needed to incorporate changes in applicable laws, regulations, contract amendments, other program requirements or updated processes?
- Being reviewed to determine if the document is still relevant and necessary?
- Developed, revised, and reviewed by all impacted business areas?
- Shared frequently and easily accessible with my team and matrix partners? Are all employees trained on the documents?

Remember

Strong policies and procedures not only help fulfill requirements but **promote a strong culture of compliance throughout each HCSC business area**. Missing or incomplete documentation may lead to potential risks and/or issues of non-compliance.

If you are not aware of your departmental policies and procedures, or have any questions, promptly reach out to your management to discuss further.