

# GOVERNMENT PROGRAMS COMPLIANCE OFFICER NEWSLETTER

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HEALTH CARE SERVICE CORPORATION



*Message from Kim Green  
HCSC Government Programs Compliance Officer*

Welcome to our first newsletter of the year! As you may have noticed, Government Programs Compliance (GPC) didn't publish a newsletter during the first quarter of 2016. This was due to HCSC being audited by the Centers for Medicare and Medicaid (CMS). On January 25, 2016, HCSC received the initial Program Audit notice from CMS and GPC immediately began the coordination activities. As of the date of this writing, the final audit report has not been issued. However, work is still ongoing as we move into the remediation and corrective action phases. In this issue, we offer friendly reminders as to how you can help with these ongoing activities. We will share more important information when the final report becomes available.

As a reminder, HCSC is a Plan Sponsor that administers various state and federal Government Programs including Medicare Advantage, Medicare Prescription Drug Plan, 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.

Please remember that you are required to report any suspicious behavior or potential wrongdoing related to any government contract. You can report this information to your manager or our Medicare Compliance hotline number, which is listed below. All calls to our hotline can be made anonymously and without fear of intimidation or retaliation. As the Government Programs Compliance Officer, please know that you can always contact me directly at 312-653-5110. We encourage you to visit our [website](#) and submit any topics that you would like to read about in future newsletters.

Kim Green  
HCSC Government Programs Compliance Officer

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## Government Programs Hotline

For compliance questions  
or concerns related to:

- Medicare Advantage
- Medicare Part D
- Medicaid

**1-877-211-2290**



Periodically, CMS performs Program Audits on Plan Sponsors who administer various Medicare Advantage and Prescription Drug Plan contracts. On **January 25, 2016** HCSC received an official audit notice from CMS. The areas audited were:

- ◆ Part C Organization Determination Appeals and Grievances (ODAG)
- ◆ Part D Coverage Determination Appeals and Grievances (CDAG)
- ◆ Special Needs Plans - Model of Care (SNP-MOC)
- ◆ Prescription Drug (Part D) Formulary Administration (FA)
- ◆ Part C and Part D Compliance Program Effectiveness (CPE)

CMS requires an enormous amount of documentation for their review prior to the on-site portion of the audit. They have very strict due dates for the requested documentation. Several business areas within HCSC were instrumental in providing the required documentation to CMS including the Government Programs Division Medicare Operations, HCM Program Oversight, Enterprise Pharmacy, Audit Services and the Special Investigations Department (SID). The audit began on March 7, 2016 and concluded with an exit conference on March 17, 2016. HCSC received a preliminary report of findings and anticipates receiving the final report during the summer of 2016. Any Civil Monetary Penalties that CMS chooses to impose on HCSC will be communicated after the final letter.

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## How can you help?

As we await the final report from CMS, there is still work that's ongoing. Issues that were discovered during the audit are actively being corrected, new policies and procedures are being developed and implemented and collaborative work to enhance our current processes is being completed.

You can help by:

- 1) If you work on any of the Program Audit areas and are responsible for remediating any issues you should:
  - Understand the issues.
  - Identify and fix any member issues.
  - Conduct a complete root cause analysis.
  - Develop a plan to fix the root cause issues.
  - Validate fixes.
  - Institute monitoring to prevent recurrence.
  - Communicate with and seek help from your management throughout the process.
- 2) On an ongoing basis you can keep current with CMS guidance and rules by:
  - Reviewing all applicable Policies and Procedures related to your job.
  - Knowing the rules and regulations of the government contract your job duties pertain to.
  - Completing any corporate or job specific training that's assigned to you.
  - Reach out to your manager if you have questions.

In addition to your management and Government Programs Division Program Oversight, the following list of contacts are available to answer questions and provide guidance related to government compliance. We can all work together to keep the lines of communication open and ensure we are running a compliant operation.

Government Programs Compliance Department		
Kim Green	Medicare Compliance Officer	kim_green@bcbsil.com
<b>Directors</b>		
Sandra Chavez	Director	sandra_chavez@bcbsnm.com
Ren Herr	Director	ren_herr@bcbsil.com
Melissa Lupella	Director	melissa_lupella@bcbsil.com
Kim Tulsy	Director	kim_tulsy@bcbsil.com
<b>Managers</b>		
Charles Pickett	Sr. Manager	pickettc@bcbsil.com
Steven Mores	Manager	steven_mores@bcbsil.com
<b>Staff</b>		
Denise Anderson	Compliance Analyst	denise_anderson@bcbsnm.com
Bill Biegel	Compliance Consultant	biegelw@bcbsil.com
Angela Broadway	Compliance Analyst	angela_broadway@bcbsil.com
Grace Kim	Compliance Consultant	grace_kim@bcbsil.com
Memo Prado	Data Report Analyst	pradom@bcbsil.com
Michael Szott	Compliance Consultant	michael_c_szott@bcbsil.com

## CONTACT INFORMATION

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

Hotlines - Available 24/7  
(report anonymously)  
Fraud Hotline  
**1-800-543-0867**  
Government Programs Hotline  
**1-877-211-2290**

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