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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 2020, a Regulatory Performance Liaison (RPL) structure was developed to ensure that business areas responsible for functional performance of the government contracts had the tools in place to continually meet the regulatory requirements. The RPL project was designed, approved by leadership and launched as a mechanism to operate and sustain performance in Medicare and Medicaid government contracts. Key stakeholders from all lines of business, with help from Compliance worked together to ensure this important project was fully implemented.

This edition will provide details around the RPL project, responsibilities, and the future for the RPL structure.

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

Integrity • Respect • Commitment • Excellence • Caring



GPC RESOURCES

Government Programs Compliance Officer

Kim Green
Vice President

Enterprise Medicaid/Debarment

Melissa Lupella
Senior Director

NM Medicaid
Jeanene Kerestes
Senior Director

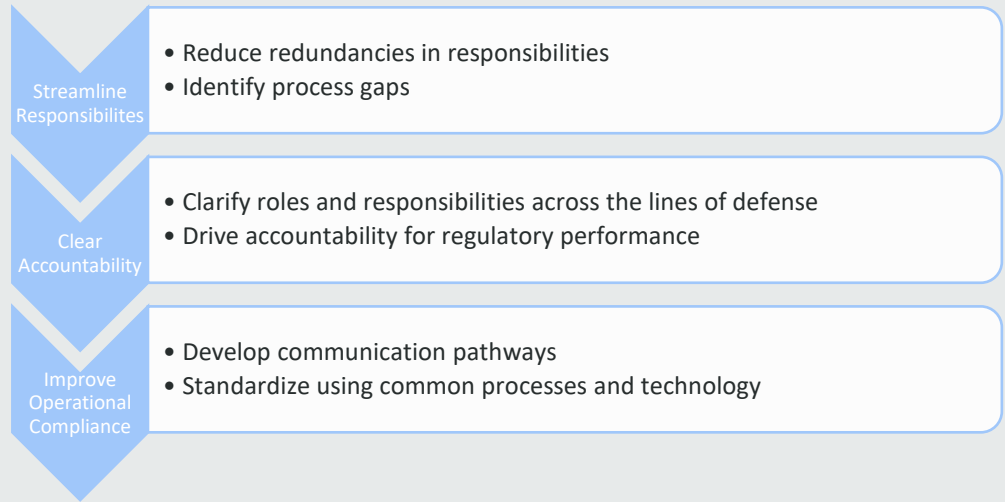
IL Medicaid
Ryan Lipinski
Director

TX Medicaid
Kirstie Reck
Director

OK Medicaid
Melanie Stevens
Director

What is an RPL?

An RPL is a single designated point of contact for operational regulatory functions and expertise within a government programs business area. Primary goals of the RPL Work were to:



RPL Focus:

The RPLs were strategically selected by leadership to lead efforts within their respective business functional areas. The RPLs worked diligently to enhance and implement documentation in several key areas to promote adherence to the regulatory requirements. The work was tailored by the needs of each business area; however, the general activities included completing a contract requirements grid, establishing and implementing ongoing performance monitoring, creating issue escalation and management procedures, documenting processes for regulatory change implementation, overall policy and procedure revisions/development and providing staff for audit support as applicable.

How do I find out who my RPL is?
Reach out to your business area leadership or to anyone on the Government Programs Compliance (GPC) team and they can assist you in identifying your RPL.



Contact Us

Email

hisccompliance@bcbsil.com

24/7 Hotline

1-800-838-2552

**REPORT
ANONYMOUSLY**

Website

www.hisccompliance.com

How can my business area RPL help me?

Regulatory Requirements

- ✓ The RPL maintains a grid of regulatory requirements applicable to your business area's requirements. When a new or updated regulatory requirement is issued, the RPL will work with your business area to ensure all the updated or new requirements have been fully operationalized.

Performance Monitoring

- ✓ The RPL ensures monitoring occurs within the business area and analyzes performance metrics against regulatory requirements. This includes results of monitoring, quality reviews and sampling.

Issue Management

- ✓ The RPL should be notified immediately if an issue has been identified within your business area to ensure proper issue management and escalation processes are followed. If a formal Corrective Action Plan (CAP) is necessary or has been issued by a regulator the RPL will work with your business area to assist in the development and coordination of remediation activities.

Audit Support

- ✓ For regulatory audits, the RPL will work with your business area to provide all requested items and ensure that a quality check has been completed prior to submission.

Policies and Procedures

- ✓ The RPL is aware of business area policies and procedures and coordinates the reviews and updates and ensure that all P&Ps are presented at the appropriate committees for approval.

The future for the RPL Structure:

The RPLs continue to monitor business operations in order to improve and sustain operational compliance. In such, they will continue to update and maintain all created documentation as well as follow all established processes. They will also continue to report quarterly to the RPL Committee that is facilitated by GPC. The RPL structure and responsibilities will continually adapt to ensure continued compliance to meet the regulatory requirements.