

# 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 the role of Government Programs Compliance (GPC).** The primary function of GPC is to administer the Compliance Program, which is mandatory for all Medicare, Medicaid, and MMAI contracts. In this edition, we will explore how GPC functions within HCSC, as well as review common misconceptions about GPC's role in compliance activities.

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

Integrity • Respect • Commitment • Excellence • Caring



Government  
Programs  
Compliance

Volume XIV

Issue 2

June 2022

## In this Issue:

HCSC's Government Programs  
Compliance (GPC) Team:

Who is GPC?

What do we do?

Why do we do it?

When do we get involved?

How do we work to maintain  
effective compliance?



Government Programs Compliance

**GPC Resources:**

**Enterprise Medicaid/Debarment**

Melissa Lupella, Senior Director

**NM Medicaid**

Jeanene Kerestes, Senior Director

**IL Medicaid**

Yvonne Yang, Director

**TX Medicaid**

Kirstie Reck, Director

**Medicare/MMAI**

Kathleen Klein, Director

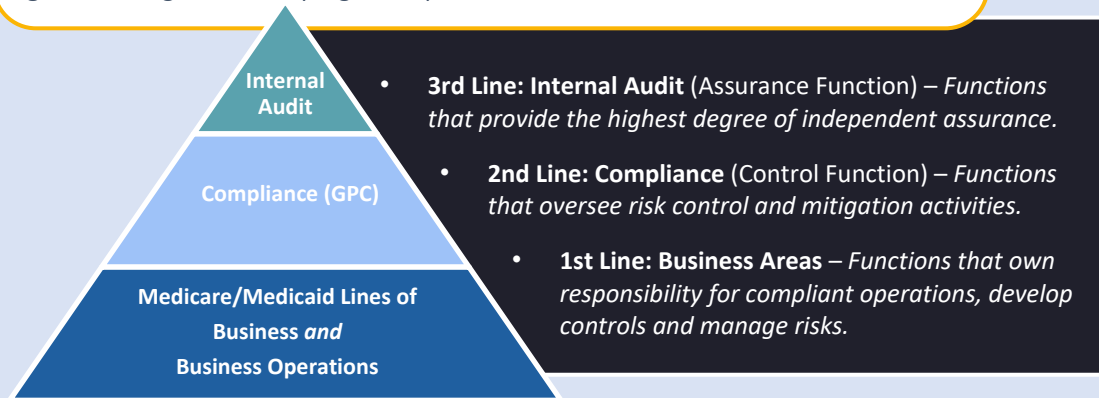
**GPC PURPOSE STATEMENT**

1. ANTICIPATE AND IDENTIFY RISKS ASSOCIATED WITH MEETING GOVERNMENT CONTRACTS REQUIREMENTS;
2. SUPPORT BUSINESS AREA EFFORTS TO MITIGATE THOSE RISKS, AND;
3. ENSURE TIMELY AND APPROPRIATE REPORTING OF THESE ACTIVITIES TO SENIOR LEADERSHIP.

**Who is GPC?**

GPC is comprised of Compliance professionals split across teams that support and are accountable for the required Compliance Programs for Medicare, Medicaid (IL, NM, TX), and MMAI, in addition to enterprise Debarment activities.

GPC is also part of the **2<sup>nd</sup> line of defense** – a role intended to provide **oversight and guidance** to government programs operational and business areas.



**What does GPC do?**

**GPC:**

- ✓ Conducts oversight focusing on **monitoring, auditing, issue identification and tracking**
- ✓ **Coordinates** with other departments/business areas to ensure day-to-day monitoring processes are in place and functioning
- ✓ Provides **support, guidance, expertise, and coaching** related to government programs compliance matters

**GPC does NOT:**

- ✗ Own operational risk or issue remediation
- ✗ Fix issues that arise from failures to meet contractual requirements
- ✗ Seek to obstruct, police, accuse, or punish business areas

GPC focuses on how HCSC meets government contract requirements. GPC will track issue remediation and corrective action plans **based on what the business area has agreed to do.**

**PUNITIVE MEASURES COME FROM OUR REGULATORS.**



Government Programs Compliance

**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)

The Compliance Program is mandatory for all Medicare, Medicaid, and MMAI contracts and must, at a minimum, include the following:

- |                                     |   |
|-------------------------------------|---|
| 4. WRITTEN POLICIES & PROCEDURES    | 1. PUBLICIZED DISCIPLINARY STANDARDS    |
| 5. COMPLIANCE OFFICER & COMMITTEE   | 2. EFFECTIVE MONITORING AND AUDITING    |
| 6. EFFECTIVE TRAINING & EDUCATION   | 3. PROMPT RESPONSE TO COMPLIANCE ISSUES |
| 7. EFFECTIVE LINES OF COMMUNICATION |   |

**REQUIREMENTS FOR FRAUD, WASTE AND ABUSE ARE PART OF EACH OF THE ABOVE REQUIREMENTS.**

## Why does GPC do what they do?

GPC activities are driven by the Compliance Program contractual requirements for each government line of business. GPC coordinates all elements of the Compliance Program across departments to meet these requirements. Failure to do so may result in various enforcement actions.

- Business areas **own the responsibility** to operate in accordance with each contract and the regulatory requirements that relate to their function.
- GPC monitoring seeks to **confirm** they are operating in compliance.

## When does GPC get involved?

Compliance issues can be identified through several means. **The following are examples of what could trigger GPC to become further involved:**

1. GPC identifies an issue through a monitoring activity
2. Business areas self-report an issue to GPC for support or guidance
3. Medicaid/Medicare Operations or Performance & Delivery teams loop in GPC when an issue is found
4. A regulator raises a question
5. Delegate reporting that requires investigation or follow-up
6. Ethics and Compliance or fraud hotline issue involves government

## How does GPC maintain Compliance?

GPC upholds Compliance through several means, including but not limited to:

1. Performing Medicare and Medicaid **annual risk assessments** and developing **monitoring and audit workplans**
2. Performing **risk-based targeted monitoring activities** to proactively identify issues and risks of non-compliance
3. **Overseeing day to day monitoring results** conducted by the **business areas**
4. **Ensuring a plan is in place to remediate issues when they are identified** in order to prevent reoccurrence (includes oversight of internal remediation and corrective action plans)

**REMINDER:** *The business areas (1<sup>st</sup> line of defense) are responsible for remediating issues and operating in compliance with the requirements*

**Compliance is the Responsibility of all Employees**