

GOVERNMENT PROGRAMS COMPLIANCE OFFICER NEWSLETTER

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HEALTH CARE SERVICE CORPORATION



*Message from Kim Green
HCSC Government Programs Compliance Officer*

Welcome to the third quarter newsletter for 2015! In this edition we will highlight the importance of identifying potential issues of non-compliance, determining the root cause of those issues, and implementing effective Corrective Action Plans (CAPs). During the recent expansion of our government contracts, issues can seem unavoidable. While issues may arise, our responses to those issues are equally, if not more important than the issues themselves. HCSC is a Plan Sponsor that administers various state and federal Government Programs including Medicare Advantage, Medicare Prescription Drug Plan, MMAI and Medicaid. As such, it's important to have a process for responding to issues that may arise in a timely manner. I urge all employees who work on government programs to remain vigilant in identifying issues.

As always, 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

Your 24/7 resource

With the complexities of our government programs, there may be a time when an issue arises that needs to be reported. The identification of issues can come in many different forms. You may see something that seems out of place in your normal work day, or someone may inform you of a potential concern. Even if the issue seems small to you, it could be part of a larger systemic issue, an issue of non-compliance or fraud, waste or abuse (FWA) and should be reported. You can report issues to your management, or one of the other corporate resources listed in this publication.

After an issue has been identified, a Corrective Action Plan may be required to fix the immediate problem and prevent future problems from occurring.

One of the first steps after an issue has been identified, is determining its **root cause**. This can be done by performing a **root cause analysis**.

A ROOT CAUSE ANALYSIS is basically getting to the source of an issue. Often, what we initially see as an issue is in fact a “symptom” of the root cause. Identification and remediation of the root cause is usually the most effective way to address symptoms.

Example

Issue/Symptom	Intermediate Cause	Root Cause	Resolution
Materials Submitted Late	Heavy Workload	Under Staffed	Conduct a staffing analysis to determine if hiring or re-alignment of staff is warranted
Call Center Missing Performance Standards	CAs spend lots of time explaining details to members on calls to minimize confusion	Materials mailed to members were unclear	Write correspondence to more clearly state objective in the future
Regulator returns inaccurate report	Employee pulls information from an incorrect source	Regulatory Requirements are not known No quality check process in place	Additional Training

Getting to the Root Cause of an issue requires looking beneath the surface.

What is a Corrective Action Plan?

A CAP is a written document that outlines a step by step process for identifying and correcting potential violations or issues of non-compliance. Some essential components of an effective CAP are as follows:

Identification of The Problem

- Clearly state the issue. This section should include the details surrounding the issue including the root cause analysis. Answering the following questions will help you clearly state the issue:
 - ◆ What is currently happening?
 - ◆ What should be happening?
 - ◆ Why is this happening? (root cause)
 - ◆ Who are the stakeholders?
 - ◆ What is the effect on the stakeholders?

Identified Owners

- For each step of the action plan, accountable owners should be identified. All identified owners should have input and agree on the CAP.

Corrective Actions

- These actions should resolve root cause issues.

Expected Completion Dates

- A completion date should be identified for each step of the action plan.

Documentation

- Evidence to show corrective actions have been taken to resolve the issue.

Monitoring Plan

- A CAP will likely not be effective unless the progress is continually monitored. A monitoring plan should be established to outline the steps to be taken to confirm the corrective action plan has been effective.

NOTE: If an issue is identified in your Business Area, you may be required to create and/or follow a CAP to address and correct it. Please keep in mind the information provided here is a guide. Please confer with your management and Compliance during the CAP implementation process.

CONTACT INFORMATION

- Email - If you have any news or questions that you would like included in the newsletter, please send an email to: hiscscompliance@bcbsil.com
- Fraud Hotline - Available 24/7 - Report fraud issues anonymously
 - 1-800-543-0867 - for Members
 - 1-877-272-9741 - for Producers, Vendors & Providers
 - 1-877-211-2290 - for Employees
- Visit our website: www.hiscscompliance.com