

GOVERNMENT PROGRAMS

Compliance Officer Newsletter

Volume VI, Issue 3

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ISSUE

Compliance Officer
Newsletter
“Back To Basics”
Series
Chapter #1



Message from Kim Green

Welcome to the Government Programs Compliance (GPC) quarterly newsletter. Our goal is to provide you with pertinent information relating to the administration of the various government programs administered by HCSC.

HCSC is a Plan Sponsor that administers several 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 Corporate Integrity 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.

Kim Green

HCSC Government Programs Compliance Officer

HEALTH CARE
SERVICE
CORPORATION

Government Programs Hotline

combining with Corporate Integrity Hotline

**For compliance questions
or concerns related to:**

- Medicare Advantage
- Medicare Part D
- Medicare

1-877-211-2290

1-800-838-2552



Introducing the Compliance Officer Newsletter

“Back To Basics” Series!

This newsletter kicks off a series to focus on how all of us who work on Government Programs have an essential part to play in compliance. We are beginning with a high level introduction into the requirements that pertain to government program business and an overview of the Government Programs Compliance Department (GPC) and our role. Future issues will address how you contribute to compliance.

Remember: Everyone is responsible for compliance.

The starting point—first, last and always — is the rules.

Any department or staff providing administrative support to Medicaid, Medicare Advantage and Part D lines of business and/or any vendors that provide such support, is responsible for compliance with the regulatory requirements that apply directly or indirectly to your business functions. For example, appeals staff must have a thorough knowledge of appeals requirements, but must also have a general familiarity with enrollment and marketing rules so that they can refer to them, as needed. No one can keep all of the requirements in memory. You should bookmark the resources below and refer to them frequently when questions arise.

Medicaid products are governed by the terms set forth in our contracts with the States. To get information about Medicaid products, visit the Government Programs website on FYIBLue http://hcsc.fyiblue.com/about/organization/gov/understanding_medicaid.htm

For Medicare, CMS publishes two managed care manuals. These manuals contain CMS' guidance on the laws and regulations and are supplemented by numerous additional communications throughout the year. All staff working on Medicare products need to have a fundamental knowledge of both manuals

Medicare Managed Care Manual

<https://www.cms.gov/Regulations-and-Guidance/Guidance/Manuals/Internet-Only-Manuals-IOMs-Items/CMS019326.html>

Medicare Prescription Drug Benefit Manual

https://www.cms.gov/Regulations-and-Guidance/Guidance/Manuals/Downloads/Pub100_18.pdf

Corporate Integrity Hotline: 1-800-838-2552

Government Programs Compliance

The Centers for Medicare and Medicaid Services (CMS) has specific requirements for Medicare and Medicaid Compliance Programs. The Compliance Program includes the following core elements :

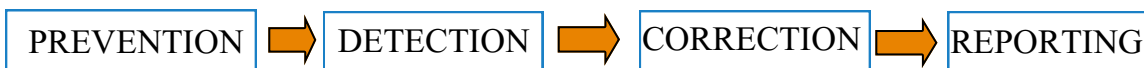
- I. Written Policies, Procedures and Standards of Conduct;
- II. Compliance Officer, Compliance Committee, and High Level Oversight;
- III. Effective Training and Education;
- IV. Effective Lines of Communication;
- V. Well Publicized Disciplinary Standards;
- VI. Effective System for Routine Monitoring and Identification of Compliance Risks; and
- VII. Procedures and System for Prompt Response to Compliance Issues.

The Compliance Program and Compliance Policies and Procedures may be found on FYIBLue: <https://myfyi.sharepoint.com/sites/intranet/ethics/Pages/complianceprogramcharter.aspx>

The first element is primary performed by compliance resources. GPC writes the Government Programs Compliance Policies and Procedures and works with the Ethics and Compliance Department on the Standards of Conduct. However, this does not negate or replace your obligation to have departmental policies and procedures that articulate the rules applicable to your department.

Similarly, GPC implements the second element through its reports to HCSC boards and committees. GPC does not — and could not — perform that function alone or in a vacuum. GPC is dependent upon the business to provide the information about issues and risks of non-compliance and remediation efforts that goes into the reports.

**Together, we meet HCSC's obligations to manage
issues of non-compliance through effective:**



Future newsletters will discuss how you contribute to the other elements of the Compliance Program and how your efforts are critical to the success of HCSC in the Government Programs space.

Corporate Integrity Hotline: 1-800-838-2552

If you have questions or need assistance,
 your first stop should be your management and Program Oversight.
 Program Oversight resources may be found at the following locations:

FYIBlue: <http://community.fyiblue.com/sites/RetProgOvr/default.aspx>

OSCAR SharePoint: <http://community.fyiblue.com/sites/GPDProgram/Shared%20Pages/GPDHome.aspx>

If you need additional support, or if you need to report an issue or risk of non-compliance,
 the individuals in this list of contacts are also available to you.

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REPORT
ANONYMOUSLY

Website

www.hisccompliance.com

Corporate Integrity Hotline: 1-800-838-2552