

GOVERNMENT PROGRAMS

Compliance Officer Newsletter

Volume VII, Issue 3

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Back to Basics Series:

Reporting

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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



All of us who work on government programs have an obligation to manage issues of non-compliance through effective prevention, detection, correction and reporting.

Previous newsletters have taken a deeper dive into issue prevention, detection and correction.

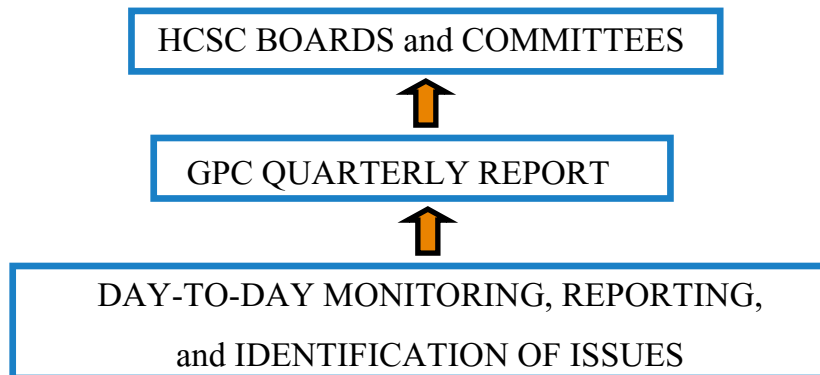
We continue this “Back To Basics” series with the fourth action step: REPORTING.



GPC REPORTING OBLIGATIONS

Chapter 21 of the Medicare Managed Care Manual, the Compliance Program Guidelines, sets out the 7 elements of an effective compliance program. The second element requires us to designate a compliance officer who periodically reports directly to our governing body on the status of the compliance program, including issues identified, investigated, and resolved.

Kim Green, the Government Programs Compliance Officer, routinely reports to senior leadership, boards and committees. For example, GPC compiles a comprehensive Quarterly Report that provides details to the boards and committees about regulatory actions related to HCSC’s compliance with requirements as well as ongoing activities to identify and correct compliance issues.



THREE TYPES OF REPORTS

(and how they are used)

1. Internal Reports

Internal reports assist you in understanding the current state of compliance in your business area. In the Q2 Newsletter, the root causes analysis “life cycle” Step 4 described how to use ongoing monitoring to determine whether a remediation effort was successful. Using an internal report will help you to reveal compliance issues that require improvement or confirm adherence to compliance guidance and regulations. An internal report may be as simple as an individual employee reviewing a few key compliance metrics on a regular basis or as complex as a department-wide internal audit.

THREE TYPES OF REPORTS (and how they are used)

2. Regulatory Oversight Monitoring (ROM)

Regulatory Oversight Monitoring captures the results of your formal, routine monitoring activities. The ROM presents an overall, “big picture” compliance snapshot for your business area. ROM is facilitated by Program Oversight. ROM has a monthly frequency of reporting and your business area will work directly with Program Oversight to assist with identifying and tracking the remediation of issues.

3. Ad-hoc Reports From Regulators

Ad-hoc reports will occasionally be requested and required by regulators. Your response must be prompt, complete, and accurate. It is essential that your reports to regulators address the issue and information being sought. Before submitting a report to regulators, please engage your business area leads and GPC.

YOUR ROLE IN REPORTING

Why Is Reporting Important?

Reports are an objective measure that reflect the status of your work and the status of our operations here at HCSC. Reports have the potential to confirm a successful program or indicate an underlying operational or compliance issue.

Remember that your reports need to drive towards the regulatory and contractual requirements. The starting point — first, last, and always— is the rules. A report that is not grounded in the rules or contractual requirements will not accurately represent the state of compliance.

Reporting Issues and Concerns

Everyone has a responsibility to report compliance issues. This is your obligation under the HCSC Code of Ethics and Conduct. There are several ways you can report your concerns. Remember that discovering and reporting issues is a success because it provides HCSC with the opportunity to take corrective steps. The Corporate Resources SharePoint site has a helpful listing of all the ways you can report:

Corporate Resources Reporting:

Prompt Response to GPC Inquiries with Accurate Information

GPC will occasionally contact you with a question or request for information. Due to the nature of our requests, it is important that you respond promptly. If you do not have the information being sought, are confused about what is being asked, or believe another person would be a better source of the information, please work with the GPC team member to determine next steps.

Corporate Integrity Hotline: 1-800-838-2552

YOUR ROLE IN REPORTING

(continued)

Determining the Frequency of Reporting Within Your Department

The frequency of reporting within your department will depend on the nature of your work and the goal of the report. Every business area is different and will require different reporting. Your area needs to assess the frequency of your reporting. Reporting may occur daily, monthly, quarterly, annually, or on an ad-hoc basis, depending on the area. You may be required to report the results of your monitoring on a monthly basis to ROM.

Reporting Accuracy

A report is only useful if it contains accurate, complete information. You must engage in a critical analysis of the data and, again, remember that your reports need to drive towards the regulatory and contractual requirements. Accuracy of reporting is especially critical in the government space where we're contractually required to meet certain metrics. Failure to meet contractual obligations and regulatory requirements puts HCSC at risk.

IN THE NEXT ISSUE

In the next issue, Q4 of 2018, we will wrap up this "Back To Basics" series with a summary of what has been shared over the past year of GPC newsletters.

- Prevention
- Detection
- Correction
- Reporting

CONTACT INFORMATION

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Hotline - Available 24/7

REPORT ANONYMOUSLY

Website

www.hiscompliance.com

Corporate Integrity Hotline: 1-800-838-2552