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### A Message from Kim Green

My goal for each Government Programs Compliance Officer Newsletter is to provide you with the tools you need to comply with all rules and regulations controlling our government lines of business. Part of these rules are the guidelines outlined by the Centers for Medicare & Medicaid Services (CMS). Per CMS, an Effective Compliance Program must include seven core requirements. The first of these requirements is to have written policies, procedures, and standards of conduct.

HCSC recently created an enterprise-wide policy and procedure initiative administered by the Ethics & Compliance department. In support of this initiative, this edition of the quarterly newsletter will answer the following questions: Why do we need policies and procedures? What are they and what are the differences between them? What are the essential components of a good policy and procedure?

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, call the Corporate Integrity Hotline number, or report your concern online using the [web reporting tool](#). 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

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

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## What they are, how they differ & why they matter

### What is a policy?

A policy is a rule or directive that guides decisions to achieve an expected outcome. It describes an organization's rules for operation.

### What is a procedure?

A procedure is the who, how, where, and when necessary to implement a "policy." It is a collection of steps or tasks that describe how to fulfill the rules set forth in the policies and explains who is accountable for those tasks. Procedures list the details of how people, departments, areas, teams, or systems support or implement policies.

### What is a job aid?

Job aids, or "desk-level procedures" are specific step-by-step tasks that employees are expected to follow. They are primarily used for training staff to perform specific tasks. As such, they are not meant to be auditable – that's the function of procedures.

Policies and Procedures are important because:

⇒ **They Provide structure and outline expectations**

Policies and Procedures help to create an internal control framework. Management can rely on this internal framework to ensure regulatory Requirements are being met.

⇒ **Procedures translate into work instructions, which leads to repeatable and consistent processes**

Written documentation leads to staff having a better understanding of their responsibilities.

⇒ **They provide a mechanism to sustain and maintain business performance in times of change.**

When management or staff change roles or departments, policies and procedures can provide a smooth transition to the individuals who inherit their work.

### *What's the Difference?*

#### Policies

- ◆ Very High Level
- ◆ Identifies Rules
- ◆ Explains why it's necessary

#### Procedures

- ◆ More detailed in nature
- ◆ Identifies actions/steps needed
- ◆ Explains when to take action and what actions to take
- ◆ Shows how to fulfill the policy

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**Web Reporting Tool: [www.hsc.alertline.com](http://www.hsc.alertline.com)**

## Essential Components

**Policy title** to simplify references to the policy.

**Owner(s)** so that we can identify who is responsible for the policy.

**Definitions** (including keywords) to guard against ambiguity and misinterpretation.

**Reference** the statutes and regulations that apply to this policy.

**Key dates** to identify when the policy was written, implemented, or altered.

**List of Attachments** that details what documents are attached to the policy.

### *Writing Tips*

- »» Make sure wording is clear, precise, and easy to understand.
- »» Ensure that policies and procedures are complete, accurate, and in proper order.
- »» Know the applicable laws and regulations— and make sure the policy complies.
- »» When determining what to include in your policies, consider the informal and unwritten rules as well.
- »» Use careful wording.

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## **Enterprise-wide policy and procedure initiative**

HCSC's enterprise-wide policy and procedure initiative aims to establish a unified system for creating and housing our policies and procedures. This will be a huge lift for HCSC, but creating sufficient corporate-wide policies and procedures is critical to mitigate risk.

### **Goals**

- ◆ Build an over-arching **Enterprise-Wide Framework and Governance Structure**
- ◆ Build consistency in Policy Templates & Workflows
- ◆ Move towards a centralized repository with search functionality
- ◆ Identify and remediate policy management gaps
- ◆ Evaluate new and existing policy management tools

### ***How can I help?***

As Ethics & Compliance begins its policy management efforts, you can help by:

- ◆ Being aware of the P&Ps that exist in your area;
- ◆ Routinely discussing the P&Ps that exist in your area with your management;
- ◆ Letting your management know if you are confused about the P&Ps that exist in your area or if you feel you need additional P&Ps to help you do your work; and
- ◆ Responding timely when you are contacted for information or documentation related to this critical initiative.

⇒ Take away: We need YOU for this initiative to be a success!  
Collaboration is key.

This initiative is being led by Peg Griffiths, Director of Enterprise Policy and Procedure. Expect more information from her on this program soon!

### **CONTACT INFORMATION**

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REPORT ANONYMOUSLY

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