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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 is designed to raise awareness about potential compliance risks in Government Programs associated with working remotely.

In March of 2020, each of us was asked to rise to the challenge of continuing our commitment to our members, our community, and the work we do every day while working in a remote environment. Since the beginning of the COVID-19 pandemic, we have been encouraged to keep our ethical culture strong as we battled a new and unprecedented public health crisis. Today, as some of us move to flex and some to full-time telecommuter, we must continue to live our core values of integrity, respect, commitment, excellence, and caring as a trusted partner to our members and to each other.

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



GPC RESOURCES

Government Programs Compliance Officer, Medicare Compliance Officer

Kim Green
Vice President

Enterprise Medicaid/Debarment

Melissa Lupella
Senior Director

NM Medicaid

Jeanene Kerestes
Senior Director

IL Medicaid
Ryan Lipinski
Director

TX Medicaid
Kirstie Reck
Director

Medicare/MMAI
Kathleen Klein
Director

“Ethical behavior is doing the right thing when no one else is watching.”

~Aldo Leopold

Working Remotely

What’s the difference from being in the office?

- ⊙ Although our environments may be different, we are all at work. HCSC Policies and Procedures apply everywhere – whether you are a telecommuter, in the office, or flex. It can be easy to forget outside the office environment, so remember that your office is wherever you are when working.
- ⊙ Speak up! Ask questions, raise concerns, and report misconduct. Remember, our [Non-Retaliation Policy](#) protects you when reporting concerns in good faith.
- ⊙ Stay connected and up to date with your manager and team. This builds trust, sets expectations and is especially important when not interacting face-to-face every day.

Ensuring Compliance, Wherever We Are

How can you help ensure HCSC’s compliance with Government Contracts?

- ⊙ **Prevent** – Ensure requirements of our government contracts are known to all staff working to support government lines of business and that policies & procedures are comprehensive and current.
- ⊙ **Detect** – Perform day-to-day monitoring of work related to the administration of government contracts, including vendor performance, and be aware that employees of vendors and others with whom we interact are also working in flex/remote environments.
- ⊙ **Correct** – Act quickly to remediate issues of non-compliance. Develop remediation plans, create processes, and set up monitoring to help ensure issues do not reoccur – as you do, think about risks that might arise in your area which relate to remote or flex work.
- ⊙ **Report and Respond** – Report any issues of non-compliance with our government contracts and respond swiftly to requests from the Government Programs Compliance Department. This is vital in any environment.

Need to submit a report? Reach out to your GPC Resource listed on the left or email us at hiscompliance@bcbsil.com.

Remote Security Reminders

How can you help protect both HCSC and our members’ information?

- ⊙ As we become increasingly digitally reliant, staying vigilant and taking precautions to protect the security of our data is especially important. Ensure HCSC’s information and assets are protected in any work environment by remembering to be aware of your surroundings.
- ⊙ Always remember to log off /lock your laptop when you step away, even if you think you will be gone for just a couple of minutes. When traveling, always keep your laptop with you.
- ⊙ If you suspect a security incident, don’t hesitate to contact the [Cyber Security Incident mailbox](#) (24/7) or call the Information Security Hotline at 972-996-9866.
- ⊙ If an email seems suspicious, click the “Report Suspicious Email” tab in Outlook. The email will be forwarded to Phishing@bcbsil.com for review.
- ⊙ Visit the [Information Security](#) page on FYIBlue for more Security Awareness tips and training.

GPC

Government
Programs
ComplianceCONTACT US

Email

hiscompliance@bcbsil.com

24/7 Hotline

1-800-838-2552

REPORT
ANONYMOUSLY

Website

www.hiscompliance.com

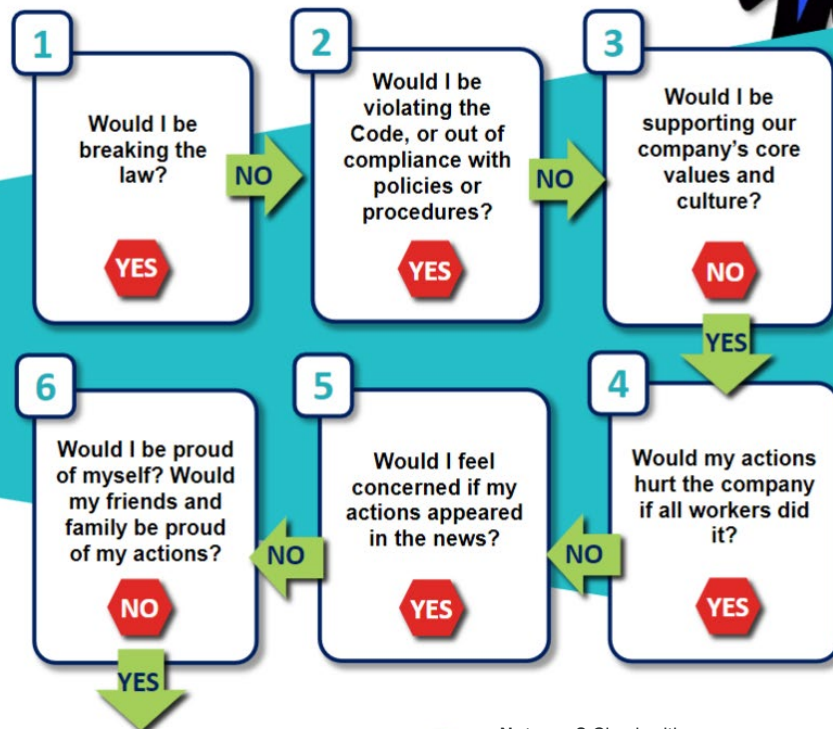
Follow the Ethical Decision-Making Model

Whether you are working in the office five days per week, are flex, or a telecommuter, the Ethical Decision-Making Model is your guide to help ensure you are doing the right thing. Remember, if you are unsure, you can always reach out to your manager, a GPC contact or any of the resources below for guidance.

Ethical Decision-Making Model

"Before you do or say something you may regret, something that violates our Code or core values, take a minute to walk through our updated Ethical Decision-Making Model."

Tom Lubben, Chief Ethics, Compliance & Privacy Officer



These actions may have serious consequences. **Don't do it.**



The decision to move forward appears appropriate.



Not sure? Check with:

- ⊙ [The Code](#)
- ⊙ [HCSC Compliance Program](#)
- ⊙ [HCSC Policies and Procedures](#)
- ⊙ Your Manager
- ⊙ [Corporate Resources](#)

To report an issue or voice a concern, complete the steps in [A Guide for Speaking Up](#).