



Government
Programs
Compliance

Volume XIX

Issue 3

September 2023

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Issue Management Through
Effective:

- Prevention
- Detection
- Correction
- Reporting

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.

In HCSC, the business areas that support government programs are required to implement and maintain a well-rounded issue management process that documents issues of non-compliance from identification to resolution. In this volume we discuss four basic components of an issue management model.

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



Government Programs Compliance

GPC Resources:

Enterprise

Medicaid/Debarment

Melissa Lupella, Senior Director

NM Medicaid

Jeanene Kerestes, Senior Director

IL Medicaid

Yvonne Yang, Director

TX Medicaid

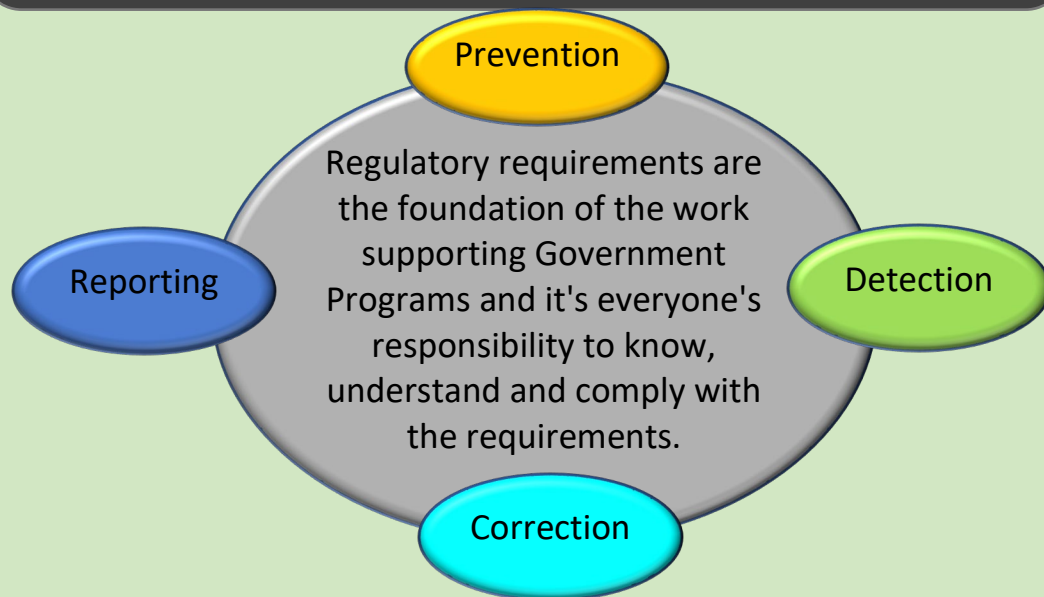
Kirstie Reck, Director

Medicare/MMAI

Kathleen Klein, Director

Issue Management

Managing issues or risks of non-compliance can be effective by using **Prevention, Detection, Correction** and **Reporting**. The four steps are implemented independently of one another but also work together to build a framework for ensuring compliant operations.



Prevention

Three essential components to prevent non-compliance are implementing effective policies and procedures, having robust job-specific training, and promptly implementing regulatory change.

Policies and Procedures

P&Ps clearly demonstrate what function you're performing

Training

Teach skills needed to perform the job within the requirements

Implement Regulatory Changes

Prompt implementation of regulatory changes



Government Programs Compliance

Contact Us

Email

hiscompliance@bcbsil.com

24/7 Hotline

1-800-838-2552

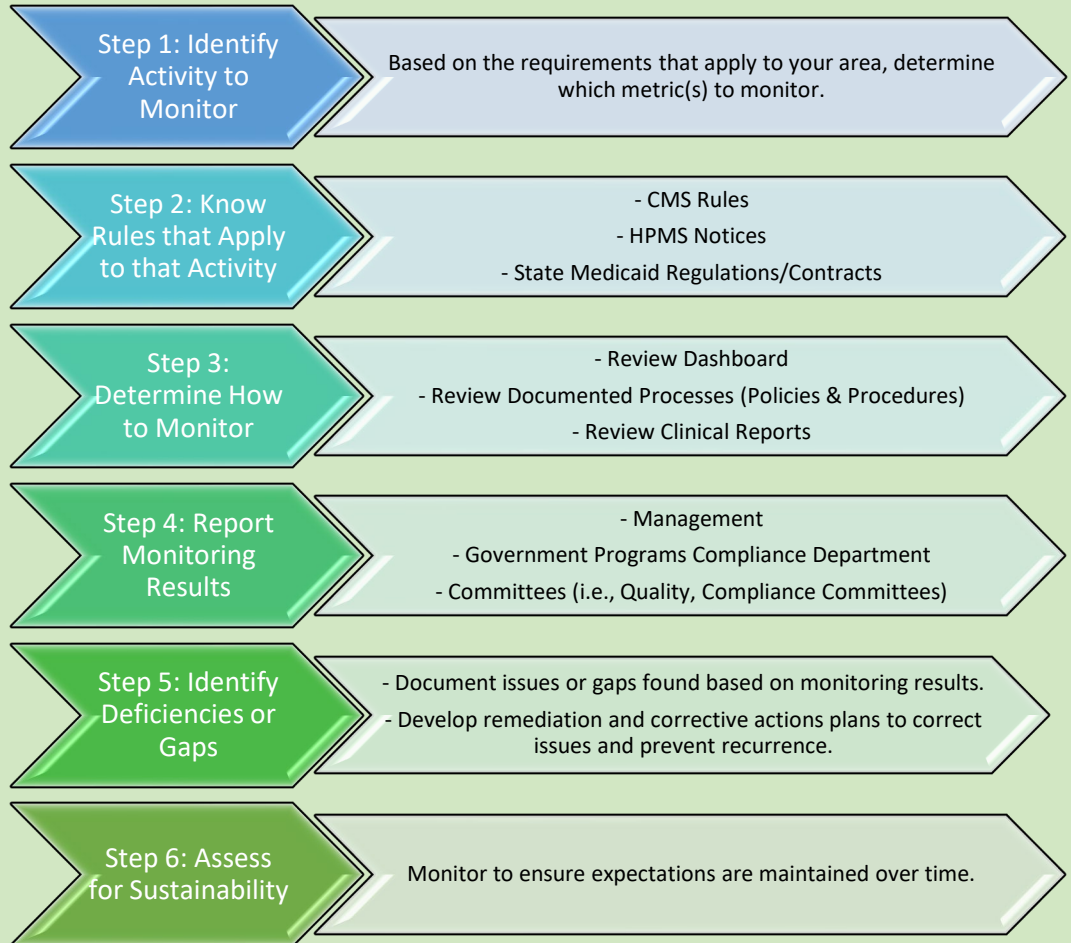
REPORT ANONYMOUSLY

Website

www.hiscompliance.com

Detection

Monitoring is one of the most effective ways to **DETECT** issues or risks of non-compliance. Below are a few essential steps in the detection process:



When we are engaged in monitoring, critical analysis of the monitoring results allows us to detect and correct issues and risks that may otherwise go unnoticed.

Correction

The fundamental purpose of issue and risk identification is **CORRECTION**. Below are a few essential steps in the correction process:

IDENTIFY THE ISSUE

Analysis of monitoring results helps **IDENTIFY** issues of non-compliance

MITIGATION

Take remediation steps to **STOP** the issue and correct any member impact

DETERMINE THE ROOT CAUSE

Once an issue has been discovered, you must identify **why** the issue happened. This is how you determine the **ROOT CAUSE***

FULLY RESOLVE THE ISSUE AND PREVENT RECURRENCE

Complete mitigation steps and develop **corrective action plans** to address the root cause and prevent recurrence

***Further details on Root Cause Analysis will be provided in the next Quarterly Newsletter in December 2023.**

What is Reporting and Why Is it Important?

Reports are an objective measure that reflect the status of your work and the status of our operations here at HCSC.

Reports can demonstrate adherence to regulatory requirements or indicate an underlying operational or compliance issue.

When issues or risks are identified, reports may be required by government agencies. A report is only useful if it contains accurate and complete information.

Reporting

Remember...

- ✚ Every business area is responsible for knowing the rules that apply to their area and for fully addressing and reporting any identified issues or risks of non-compliance.