

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 contracts we administer. If we fail to meet those requirements, we are at risk for being subjected to various enforcement actions.

CMS and State Medicaid contracts require HCSC to establish and maintain an effective Government Programs Compliance Program to prevent, detect, and correct issues of non-compliance. The 2024 Government Programs Compliance Newsletters will focus on the core requirements that make up an effective Compliance Program, known as the “seven 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
- VII. Procedures and System for Prompt Response to Compliance Issues

This newsletter provides an overview of Element III, “Effective Training & Education” and Element V, “Well-Publicized Disciplinary Standards.”

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

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 or Medicaid

HCSC Corporate Integrity HOTLINE
1-800-838-2552

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In this issue:

Element III. Effective Training & Education:

- General Compliance and FWA Training
- Job-Specific Training

Element V. Well-Publicized Disciplinary Standards

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GPC Resources:

Enterprise Medicaid

Jeanene Kerestes,
Senior Director

NM Medicaid Compliance Officer

Hanna Padilla,
Director

IL Medicaid Compliance Officer

Yvonne Yang,
Director

TX Medicaid Compliance Officer

Kirstie Reck,
Director

Medicare/MMAI

Kathleen Klein,
Director

Debarment

Denise Anderson,
Senior Manager

Element III. Effective Training & Education

CMS and other State regulators require HCSC to implement effective training to meet our government programs contract requirements. To meet these requirements HCSC establishes, implements, and provides effective training and education on general compliance responsibilities and Fraud, Waste, and Abuse (FWA). General compliance and FWA training must occur within **90 days** of hiring and annually thereafter.

Did you know that all employees, including the CEO, the Board of Directors, managers, and all temporary workers are required to take these trainings?

In addition, all employees who work on government programs are required to receive job-specific training at initial onboarding and continually throughout employment. Job-specific training teaches employees the skills, knowledge, and competencies that are needed to perform his or her specific job within their department.

Element V. Well-Publicized Disciplinary Standards

As outlined in the [HCSC Compliance Program Charter](#), all HCSC personnel must comply with the provisions of applicable laws regulations, terms, and conditions of Government Contracts and the Compliance Program.

Lack of knowledge, good intentions, or poor judgment are no excuse for non-compliance. Violations of any policies, procedures or standards, or failure to report violations may result in disciplinary action, up to and including termination.

Violations can include:

- Engaging in any conduct that is prohibited by the Code,
- Failure to report through the channels identified in the Code.
- Failure to cooperate with Company officials or participate in or assist in the remediation of compliance issues and
- Failure to enforce the Code if you have the responsibility for enforcing the Code.

The Government Programs Compliance Officer works with appropriate areas to ensure that disciplinary actions are enforced in a timely, consistent, and effective manner.

Disciplinary Standards are provided during new hire and annual training and are highlighted in several areas including job applications, internal social media sites, and on-line publications.

III. Effective Training and Education



V. Well-Publicized Disciplinary Standards





Contact Us

Email

hisccompliance@bcbsil.com

24/7 Hotline

1-800-838-2552

Website

www.hisccompliance.com

Regardless of your role at HCSC, it involves **having effective training and reporting** known or suspected issues of non-compliance. Examples include:

- Completing general compliance and FWA training timely.
- Having job-specific training that outline the requirements for your area.
- Promptly report known or suspected compliance issues to your supervisor, other corporate resource, or Corporate Integrity Hotline, as appropriate.

In Summary

WHO is involved in activities supporting Elements III and V of our Government Programs Compliance Program?

- Everyone must complete required trainings and any job-specific training relevant to your role. Additionally, it's everyone's responsibility to report any known or suspected compliance issues.

WHAT do our regulators require of us?

- CMS and other State regulators require HCSC to implement effective training and publicize our disciplinary standards to meet our government programs contract requirements.
- All employees must understand the compliance requirements that apply to your job.

WHY is this important (in addition to meeting requirements)?

- The general compliance and FWA trainings are designed to address FWA and ethical concerns while meeting the requirements of the Compliance Program Guidelines.
- When employees are aware of the rules that govern our business, they are better equipped to report known or suspected instances of non-compliance and are able to assist in effective remediation activities.

HOW do we accomplish this?

- All employees must complete the required training and work internally with your management to understand and adhere to the specific rules for your function.
- Report known or suspected issues of non-compliance immediately to your manager and/or the Corporate Resources.

Look out for our next GPCO Newsletter in Q4 to learn more about Elements VI and VII. Effective System for Routine Monitoring and Identification of Compliance Risks and Procedures and System for Prompt Response to Compliance Issues.