

GOVERNMENT PROGRAMS COMPLIANCE OFFICER NEWSLETTER

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HEALTH CARE SERVICE CORPORATION



*Message from Kim Green
HCSC Government Programs Compliance Officer*

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. As reported in last quarters publication, HCSC received the final audit report from the Centers for Medicare and Medicaid Services (CMS). Remediation efforts continue and more information will be provided in future publications. Being in an “audit ready” state allows us to be prepared for any CMS inquiries or additional audit activities. Part of being “audit ready” includes continual oversight of the all government contracts we administer. In this issue, we will highlight the Operational Oversight Program, developed to provide such oversight which documents the “state of compliance” for HCSC.

As a reminder, 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. We encourage you to visit our [website](#) and submit any topics that you would like to read about in future newsletters.

Kim Green

HCSC Government Programs Compliance Officer

Inside this issue:

Operational Oversight Program Overview	2
Structure—Process— Outcomes	3
Contact Information	4



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

TWO Hotlines in ONE!

OPERATIONAL OVERSIGHT PROGRAM

Purpose: Evaluate, demonstrate and report on whether HCSC and its subsidiaries:

- (1) have the tools and processes in place to run a compliant operation; and
- (2) to reduce HCSC's Government Programs compliance risk.

The Oversight Program was developed in response to HCSC's growth in the government marketplace. The Program uses 3 "pillars" to evaluate HCSC's level of compliance in various areas. The results are shared with Senior Leadership quarterly to highlight the "state of compliance".

How can you help? If you work on any of the government programs HCSC administers, your day-to-day work product could affect this report. You can help by doing the following:

1. Review the list below. If you work in one of these business areas, your work directly impacts this Oversight Program.
2. Respond timely to inquiries from GPC, Government Programs Division Program Oversight (GPDPO) or any other area related to government programs. Prompt responses are essential to timely issue resolution, responding to regulators and supporting a compliant operation.
3. Ask questions if you are unsure or need guidance. Some resources include:
 - ⇒ Your Management
 - ⇒ GPDPO Contact
 - ⇒ GPC Contact
 - ⇒ Applicable Policies and Procedures
4. Provide feedback to management for process improvements.

BUSINESS AREAS BEING EVALUATED

- Organizational Determinations and Appeals
- Customer Service
- Formulary Administration
- Quality and MTMP
- Medical and Rx Claims and Risk Adjustment, Including PDE
- Network Provider, Suppliers, Credentialing
- Marketing and Marketing Materials
- Grievances/CTMs
- Benefits and Beneficiary Protections
- Enrollment/Disenrollment LEP
- Coverage Determinations and Appeals
- Bids
- Care Coordination
- Sales

Pillars: CMS has advocated using 3 “pillars” of Structure, Process and Outcomes as best practice for rating compliance program effectiveness. On a quarterly basis, GPC and GPDPO evaluate these “pillars”. The pillars are explained below.

Structure + Process + Outcomes = Effective Compliance

STRUCTURE: Components that HCSC have put in place, or should have put in place, to support a compliant operation (e.g. Governance, Policies & Procedures, Training, Regulatory Process, Risk Assessment/Monitoring/Auditing and Communication and Reporting).

How can you help?

- Does your business area have robust policies and procedures?
 - Do the policies and procedures directly tie to the applicable regulations?
 - Are the policies and procedures current and updated annually?
 - Know and apply the regulations/requirements that elate to your job function(s).
 - Does your business area provide job specific training for new and current employees? If not, speak to you manager.
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PROCESS: Key functions required by Government Programs (e.g. accountable ownership, familiarity with CMS guidance, performs routine monitoring).

How can you help?

- ◆ When changes to regulations occur, does your business area communicate those changes and implement appropriate pro-cess modifications?
- ◆ Does your business area have monitoring activities?
- ◆ When monitoring occurs within the business area, are the results communicated to management?
- ◆ Are monitoring results reported through the System of Controls (SOC)?

OUTCOMES: HCSC's observable and measurable operational compliance results based on regulatory standards (e.g. metrics and dashboard results, CMS timelines met).

How can you help?

- ◆ Familiarize yourself with the Oversight System of Control and Audit Resource (OSCAR) monthly meeting (at which monitoring metrics collected through SOC are reported).
- ◆ Ensure internal deadlines are met that relate to CMS timelines or another regulatory agency timeline.

Structure + Process + Outcomes = Effective Compliance

Remember, everyone plays a valuable role in ensuring HCSC adheres to all applicable federal and state regulations. As such, please consider how your business area impacts the Oversight Program and keep in mind that the work you do assists HCSC in maintaining an "audit ready" culture.

CONTACT INFORMATION

Email:
hisccompliance@bcbsil.com

Hotlines - Available 24/7
(report anonymously)
Fraud Hotline
1-800-543-0867
Corporate Integrity Hotline
1-800-838-2552

Website:
www.hisccompliance.com