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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.

To identify, plan, and prioritize current and potential risks in the Government lines of business, Government Programs Compliance (GPC) conducts an annual Risk Assessment. The goal of the Risk Assessment is to identify risks impacting the various business areas which support Government lines of business in order to develop monitoring strategies and Compliance Department activities for the coming year.

This newsletter edition is designed to provide an overview of the Government Programs Compliance Annual Risk Assessment.

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

What is a Compliance Risk Assessment?

- In Government Programs (Medicaid, Medicare and MMAI), an annual Risk Assessment must be completed to identify current and potential risks within the various business areas supporting Government lines of business.
- The Risk Assessment is tied to Federal regulations which require compliance programs to establish and implement an effective system for the monitoring and identifying compliance risks. A risk is considered anything that could potentially make HCSC non-compliant with regulatory and/or contractual requirements.
- Annually, under the direction of the Government Programs Compliance Officer (GPCO), Government Programs Compliance (GPC) conducts this Risk Assessment and rates risks in order of relative risk level. The Risk Assessment provides a systematic way to assess and prioritize monitoring and auditing activities. A standardized review tool is utilized to conduct the Risk Assessment for all business areas, which includes the following categories:
 - Internal Factors
 - External Factors
 - Process Monitoring
 - Outcomes

What is the Purpose of the Compliance Risk Assessment?

- Upon completion of the Risk Assessment, a summary is presented to Government Programs leadership, the State Medicaid Regulatory Compliance Committees, and the Government Programs Compliance Committee.
- The results of the Risk Assessment are used to prioritize and plan compliance monitoring strategies and activities for the upcoming year, based on risk level. To direct GPC's focus, there is a range in the assignment of Low, Medium, and High risk to business areas – in other words, some business areas who score either High or Medium will have more frequent and/or complex activities than those with a Low-risk rating.
- The Risk Assessment drives GPC annual Monitoring Work Plans, which include planned targeted monitoring activities based on identified risks. GPC collaborates with business areas on planned targeted monitoring activities to develop strategies to mitigate these risks.
- Adjustments are made to the Monitoring Work Plans based on emerging risks throughout the year.



Government
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Annual Compliance Risk Assessment Cycle



What the Compliance Risk Assessment is **NOT**

The Compliance Risk Assessment is **NOT**:

- A scorecard of the business areas performance.
- A dashboard that assesses risk based on operational performance.
- A judgement or a comparison between business areas or to evaluate who is “good” or “bad.”
- Used to determine or drive funding for business areas and/or programs.