

**Minutes of the Open Session of the
Corporate Compliance/Privacy and Internal Audit Committee
Thursday, May 19, 2016
El Camino Hospital, 2500 Grant Road, Mountain View, CA 94040
Conference Room E**

Members Present

John Zoglin, Chair (via teleconference)
Sharon Anolik Shakked, Vice Chair
Christine Sublett
Jeffrey Davis, MD

Members Absent

None

Others Present

Tomi Ryba
Mary Rotunno
Diane Wigglesworth
Joann McNutt
(arrived at 5:25pm)

Agenda Item	Comments/Discussion	Approvals/Action
1. CALL TO ORDER/ROLL CALL	The Open Session meeting of the Corporate Compliance/Privacy and Internal Audit ("CCPIA") Committee of El Camino Hospital (the "Committee") was called to order at 5:02 pm by Ms. Anolik Shakked. A silent roll call was taken. Chair Zoglin joined the meeting by web conference; all Committee members were present.	
2. POTENTIAL CONFLICT OF INTEREST DISCLOSURES	Vice Chair Anolik Shakked asked if any Committee members may have a conflict of interest on any of the items on the agenda. No conflicts were noted.	
3. PUBLIC COMMUNICATION	None.	
4. COMMITTEE RECRUITMENT	<p>Diane Wigglesworth, Compliance/Privacy Officer, reported that to fill the two vacancies on the Committee, staff advertised to candidates through leadership, in local print media and on LinkedIn. Staff received three resumes, but only one candidate may meet the criteria requested by the Committee (with a healthcare background).</p> <p>The Committee discussed whether or not to pursue formal recruitment and how many members to recruit. Discussions highlighted that the Committee is looking for skills in ERM and financial audits.</p> <p>Tomi Ryba, Chief Executive Officer, noted that Jeff Hodge is a recruiter the Hospital has retained previously for similar searches. Ms. Ryba will provide a cost estimate to Chair Zoglin, who will confirm the cost with Chair Cohen.</p> <p>Motion: To appoint Committee members Sharon Anolik Shakked and Christine Sublett to an Ad Hoc Committee for the purpose of recruiting 1-2 Committee members.</p> <p>Movant: Sublett</p>	<p><i>Motion passed to form ad hoc committee; Recruiter to be engaged</i></p>

	<p>Second: Davis Ayes: Anolik Shakked, Davis, Sublett, Zoglin Noes: None Abstentions: None Absent: None Recused: None</p>	
5. CONSENT CALENDAR	<p>Vice Chair Anolik Shakked asked if any member of the Committee or the public wished to remove an item from the consent calendar. No items were removed.</p> <p>Motion: To approve the consent calendar: Minutes from March 17, 2016.</p> <p>Movant: Sublett Second: Davis Ayes: Anolik Shakked, Davis, Sublett, Zoglin Noes: None Abstentions: None Absent: None Recused: None</p>	<i>Consent calendar approved</i>
6. POLICIES FOR APPROVAL	<p>One new policy regarding electronic signature, and how they will be accepted by ECH. One policy with minor revisions regarding HR Educational Programs.</p> <p>Ms. Rotunno noted that this is the first electronic signature/authentication policy of this kind at ECH.</p> <p>Motion: To recommend approve the following policies: Electronic Signature and HR – Educational Programs.</p> <p>Movant: Davis Second: Sublett Ayes: Anolik Shakked, Davis, Sublett, Zoglin Noes: None Abstentions: None Absent: None Recused: None</p>	<i>Policies approved</i>
7. REVIEW COMMITTEE CHARTER	<p>As required every two years, the Committee reviewed its charter to ensure purpose and duties accurately reflect the work of the Committee.</p> <p>Chair Zoglin highlighted discussions of Stark laws and anti-kickback statutes in the charter, which Ms. Ryba recommended as updates for the Committee (provided by Ms. Rotunno) and an education area for the Board.</p> <p>The Committee discussed how best to formally educate the Board about current acute risks on an annual basis. Currently, annual compliance training is not completed by the Board. The Committee requested a memo addressing the following points:</p> <ul style="list-style-type: none"> - Legal review: Is there a legal requirement for Board members to complete annual compliance 	<i>Charter approved; education plan to be discussed and developed</i>

	<p>training like ECH staff members do?</p> <ul style="list-style-type: none"> - Design Recommendations: What should the format of annual education for the Board look like? Considerations include: balancing the current state of affairs at ECH as well as overarching developments and trends (e.g. ransomware), incorporate into Board Retreat? <p>Motion: To recommend approval of the Committee's charter as presented.</p> <p>Movant: Sublett Second: Davis Ayes: Anolik Shakked, Davis, Sublett, Zoglin Noes: None Abstentions: None Absent: None Recused: None</p>	
<p>8. KEY PERFORMANCE INDICATORS SCORECARDS AND TRENDS</p>	<p>Ms. Wigglesworth described how investigations continue to be on the rise and have been since Epic Go-Live. While the software is behaving appropriately and acting as designed, there are still process issues. Compliance reports these problems to the iCare team and is working with key stakeholders to mitigate issues going forward. Ms. Wigglesworth complimented staff and physicians for their awareness and responsiveness in reporting both minor and major problems. For any valid problems brought forward, Compliance investigates whether an issue is an isolated incident or a pattern of behavior to resolve. She explained billing integrity is major focus, especially ensuring that documentation will support an audit.</p> <p>Ms. Wigglesworth reported that the first three Epic RAC claims were requested for government review. Results are currently pending.</p> <p>Ms. Wigglesworth noted that most issues reported primarily revolve around HIPAA concerns or billing/claims, rather than EMTALA or Anti-Kickback/Stark. She also highlighted the decrease in number of required breach reports to Department of Health since Epic Go-Live.</p> <p>Dr. Davis recommended including a glossary with definitions when bringing these metrics to the Board.</p>	
<p>9. NEW ARTICLES</p>	<p>Ms. Wigglesworth presented an article describing comparable organizations' efforts to boost IT security to meet compliance needs and prepare for cyberattacks.</p>	
<p>10. ADJOURN TO CLOSED SESSION</p>	<p>Motion: To adjourn to closed session at 5:38pm.</p> <p>Movant: Davis Second: Sublett</p>	

	Ayes: Anolik Shakked, Davis, Sublett, Zoglin Noes: None Abstentions: None Absent: None Recused: None	
11. AGENDA ITEM 20: RECONVENE OPEN SESSION/ REPORT ON BOARD ACTIONS	<p>Open session was reconvened at 7:58 pm. The Minutes of the Closed Session of the Committee Meeting of January 21, 2016 were approved by a vote in favor by all members present (Anolik Shakked, Davis, Sublett, Zoglin).</p> <p>Chair Zoglin and Dr. Davis deferred their report on Board actions.</p>	
12. AGENDA ITEM 21: STATUS OF FY16 COMMITTEE GOALS	The Committee is on track to meet its goals. The last goal to be completed is a monitoring plan presented to the full Board.	
13. AGENDA ITEM 22: COMMITTEE COMMENTS	There were no additional Committee comments.	
13. AGENDA ITEM 23: ADJOURNMENT	Motion: To adjourn at 8:00 pm. Movant: Davis Second: Sublett Ayes: Anolik Shakked, Davis, Sublett, Zoglin Noes: None Abstentions: None Absent: None Recused: None	<i>Meeting adjourned at 8:00 pm.</i>

Attest as to the approval of the foregoing minutes by the Corporate Compliance/Privacy, and Internal Audit Committee of El Camino Hospital:


 John Zoglin
 Chair, CCPIA Committee