

**Minutes of the Open Session of the
Corporate Compliance/Privacy and Internal Audit Committee
Thursday, August 18, 2016
El Camino Hospital | 2500 Grant Road, Mountain View, CA 94040
Conference Room F (ground floor)**

Members Present

John Zoglin, Chair
 Sharon Anolik Shakked, Vice Chair
 Dennis Chiu (via phone)
 Christine Sublett

Members Absent

None

| Agenda Item | Comments/Discussion | Approvals/Action |
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| 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 4:59 pm by Chair Zoglin. A verbal roll call was taken. All Committee members were present. | |
| 2. POTENTIAL CONFLICT OF INTEREST DISCLOSURES | Chair Zoglin 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. CONSENT CALENDAR | <p>Dennis Chiu joined the meeting at 5:02 pm.</p> <p>Chair Zoglin asked if any member of the Committee or the public wished to remove an item from the consent calendar. Ms. Anolik Shakked requested that Item B (Status of FY17 Committee Goals) be pulled.</p> <p>Diane Wigglesworth, Sr. Director of Corporate Compliance, provided updated copies of the agenda, noting that the Committee Recruitment discussion was moved to closed session.</p> <p>In response to Ms. Anolik Shakked’s question regarding the Information Security plan goal, Ms. Wigglesworth clarified that for the preliminary report in Q2 FY17, the Committee can expect a detailed update from the CIO on the Information Security Roadmap.</p> <p>Motion: To approve the consent calendar: Minutes of the Open Session of CCPIA Meeting of May 19, 2016, Status of FY17 Committee Goals, and Article of Interest.</p> <p>Movant: Sublett Second: Anolik Shakked Ayes: Anolik Shakked, Chiu, Sublett, Zoglin Noes: None Abstentions: None Absent: None Recused: None</p> | <i>Consent calendar approved</i> |
| 5. REPORT ON BOARD ACTIONS | Chair Zoglin highlighted the funding approvals for upcoming construction projects and physical investments. There has been | |

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| | no report yet to the Board regarding ERM program and IT Security; this topic is currently paced for a joint meeting in November, pending Committee member availability. | |
| 6. FY17 INTERNAL AUDIT WORK PLAN | <p>Ms. Wigglesworth provided a summary of a risk map and proposed internal audits for this fiscal year. A number of factors were considered in putting the summary together including: third party recommendations (OIG, HCCA, HFMA, AHIA, and regulatory agencies), common risks for healthcare organizations, findings from previous audits, and interviews with the executive leadership team.</p> <p>Ms. Wigglesworth noted that she prioritized audits that would emphasize issues that could have adverse financial or regulatory impacts on the organization. Proposed audits included: 1) Financial Risk: ICD-10 Coding, Financial Cash Controls, IRS Governance Standards; 2) Revenue Cycle Risk: Case Management, Billing Integrity, OIG-focus; 3) New Technology and IT Security Risk: OCR Audit Readiness, PHI Release; and 4) Compliance Risk: Patient Centered Medical Home, EMTALA Compliance.</p> <p>She reported that Chair Zoglin suggested adding an audit that would examine whether ECH's systems are effectively designed to execute and support the outpatient strategic plan. She explained that Epic is currently working on the ambulatory build to bring on Pathways, clinics, and other primary care clinics.</p> <p>In response to Ms. Anolik Shakked's question, Ms. Wigglesworth described her methodology in developing the risk prioritization map and the grid she used to evaluate risks identified in interviews with the executive leadership team.</p> <p>In response to Ms. Sublett's question, Ms. Wigglesworth explained that the timeline for these audits is still being developed. She recommended completing the IRS Governance Standards audit first, given ECH's bond pursuits. Iftikhar Hussain, CFO, explained that the IRS' audit of ECH in 2008 had a good outcome.</p> <p>Ms. Wigglesworth asked the Committee for recommendations on audit prioritization. Ms. Sublett suggested OCR Audit Readiness be addressed soon, given their requests so far and the Coalfire report. Ms. Wigglesworth reported that she also would also prioritize ICD-10 Coding, as 6,000 more codes will be added on October 1st. Ms. Wigglesworth explained that she was not prioritizing business information analytics or RAC program effectiveness review this year because of the available bandwidth of the organization and tools in Epic that may capture similar information. She reported that there are two upcoming upgrades to Epic (in 2017), so it would be worth waiting until those are complete. Alex Robison from Protiviti commented that audits that are not being prioritized as highly may still be covered under the current work being done.</p> <p>Motion: To approve the recommended audit work plan with one additional audit to review the strategic plan and targeted growth areas.</p> <p>Movant: Anolik Shakked</p> | <i>FY17 Internal Audit Work Plan approved</i> |

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| | Second: Sublett Ayes: Anolik Shakked, Chiu, Sublett, Zoglin Noes: None Abstentions: None Absent: None Recused: None | |
| 7. KEY PERFORMANCE INDICATORS SCORECARDS AND TRENDS | Ms. Wigglesworth reported an increase in investigations, with areas of focus including billing, documentation issues, and claims activity. She described work queues in Epic where claims can be held until issues or documentation discrepancies are reviewed and resolved. Compliance will continue ongoing monitoring of billing integrity. | |
| 8. ADJOURN TO CLOSED SESSION | Motion: To adjourn to closed session at 5:25pm. Movant: Anolik Shakked Second: Sublett Ayes: Anolik Shakked, Chen, Sublett, Zoglin Noes: None Abstentions: None Absent: None Recused: None | |
| 9. AGENDA ITEM 19: RECONVENE OPEN SESSION/ REPORT OUT | Open session was reconvened at 7:27 pm. During the closed session, the Committee approved the closed session minutes of the Corporate Compliance/Privacy and Internal Audit Committee meeting of May 19, 2016 by a vote in favor of all members present (Anolik Shakked, Chiu, Sublett, Zoglin). | |
| 13. AGENDA ITEM 20: ADJOURNMENT | Motion: To adjourn at 7:28 pm. Movant: Davis Second: Sublett Ayes: Anolik Shakked, Sublett, Zoglin Noes: None Abstentions: None Absent: Chiu Recused: None | <i>Meeting adjourned at 7:28 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

