



**Minutes of the Open Session of the
Corporate Compliance/Privacy and Internal Audit Committee
Thursday, January 19, 2017
El Camino Hospital | Conference Room G
2500 Grant Road, Mountain View, CA 94040**

Members Present

John Zoglin, Chair
Sharon Anolik Shakked, Vice Chair
Lica Hartman
Christine Sublett

Members Absent

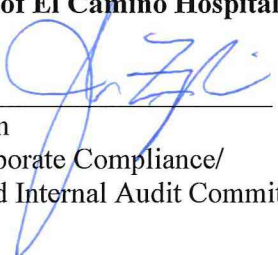
Dennis Chiu

Agenda Item	Comments/Discussion	Approvals/Action
1. CALL TO ORDER/ ROLL CALL	The open session meeting of the Corporate Compliance/Privacy and Internal Audit Committee of El Camino Hospital (the "Committee") was called to order at 5:00pm by Chair Zoglin. A silent roll call was taken. Committee Member Chiu was absent. All other Committee members were present.	
2. POTENTIAL CONFLICT OF INTEREST DISCLOSURES	Chair Zoglin asked if any Committee members may have a conflict of interest with any of the items on the agenda. No conflicts were noted.	
3. PUBLIC COMMUNICATION	None.	
4. CONSENT CALENDAR	<p>Chair Zoglin 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: Meeting Minutes of the Open Session of the Corporate Compliance/Privacy and Internal Audit Committee (November 9, 2016); Meeting Minutes of the Joint Open Session of the Hospital Board of Directors and the Corporate Compliance/Privacy and Internal Audit Committee (November 9, 2016).</p> <p>Movant: Sublett Second: Zoglin Ayes: Anolik Shakked, Hartman, Sublett, Zoglin Noes: None Abstentions: None Absent: Chiu Recused: None</p>	<i>Consent Calendar approved</i>
5. REPORT ON BOARD ACTIONS	Chair Zoglin noted that the Board approved the draft CEO position specification. There were no additional comments or questions from the Committee.	
6. POLICIES FOR APPROVAL AND BOARD POLICY OVERSIGHT	Diane Wigglesworth, Sr. Director, Corporate Compliance, presented a policy that describes the criteria for determining when documents would require approval by the Hospital Board. The policy defines differences between "Policy," "Plan," or "Scopes of Service," which will require Advisory Committee and Board approval every 3 years or as required by regulation. She clarified that procedures, protocols, standardized procedures, and guidelines do not require Board approval. Ms. Anolik Shakked requested a clear distinction between Plan and Scope of Service, rather than using one term to	<i>Policies with final review and edits approved</i>

	<p>define the other. In response to Ms. Anolik Shakked's question, Ms. Wigglesworth explained that protocols are related to patient care.</p> <p>Mary Rotunno, General Counsel, explained that this policy would significantly reduce the volume of policies coming to the Committee and the Board for approval. She also reported that she is speaking with other organizations to see how their approval processes work and their committees are structured. The Committee and staff discussed the possibility, time frame, and process for streamlining the policy approval process further.</p> <p>Ms. Wigglesworth described a second policy that guides the organization's monitoring and control of the development, review, revision, modification, approval, and distribution of policies.</p> <p>In response to Ms. Hartman's question, Ms. Wigglesworth explained that summary spreadsheets presented to the Board show archived policies.</p> <p>Motion: To approve the policies, subject to the edits to be reviewed and potentially incorporated.</p> <p>Movant: Anolik Shakked Second: Sublett Ayes: Anolik Shakked, Hartman, Sublett, Zoglin Noes: None Abstentions: None Absent: Chiu Recused: None</p>	
7. KEY PERFORMANCE INDICATORS, SCORECARD, AND TRENDS	<p>Ms. Wigglesworth reviewed the KPI trends and noted that the number of investigations have increased over the previous year. She reported that Compliance investigated staff and management concerns along with recent written complaints from CMS, Noridian, and OCR; all issues have been resolved with those agencies.</p> <p>She also noted an uptick in information brought to Compliance to be evaluated regarding Stark and Anti-Kickback concerns compared to previous years. Reportable privacy breaches increased slightly in December, but YTD are consistent with reportable breaches from previous years.</p> <p>In response to Ms. Anolik Shakked's question, Ms. Wigglesworth clarified the reportable privacy violations. Staff described the daily huddle, weekly internal newsletter, and annual training used to address problematic trends.</p> <p>Ms. Hartman noted the fiscal year dates on the scorecard should be corrected.</p>	
8. ADJOURN TO CLOSED SESSION	<p>Motion: To adjourn to closed session at 5:26 pm pursuant to <i>Gov't Code Section 54957.2</i> for approval of Meeting Minutes of the Closed Session of the Corporate Compliance/Privacy and Internal Audit Committee (November 9, 2016) and the Meeting Minutes of the Joint Closed Session of the Hospital Board of Directors and Corporate Compliance/Privacy and Internal Audit Committee (November 9, 2016); pursuant to <i>Gov't Code Section 54956(d)(2)</i> – conference with legal counsel – pending or threatened litigation: Compliance Activity Log, Privacy Activity Log, Internal Audit Follow Up, Internal Audit Work Plan, Pacing Plan; pursuant to</p>	<i>Adjourned to closed session at 5:26pm.</i>

	<p><i>Gov't Code Section 54956(d)(2)</i> – conference with legal counsel – pending or threatened litigation: Report on Internal Audit Activity; pursuant to <i>Gov't Code Section 54956(d)(2)</i> – conference with legal counsel – pending or threatened litigation: Discussion on IT Security Plan; pursuant to <i>Gov't Code Section 54957</i> for discussion and report on personnel matters: Executive Session.</p> <p>Movant: Anolik Shakked Second: Sublett Ayes: Anolik Shakked, Hartman, Sublett, Zoglin Noes: None Abstentions: None Absent: Chiu Recused: None</p>	
<p>9. AGENDA ITEM 15: RECONVENE OPEN SESSION/ REPORT OUT</p>	<p>Open session was reconvened at 6:48 pm. During the closed session, the Committee approved the Closed Session Minutes of the Corporate Compliance/Privacy and Internal Audit Committee Meeting of November 9, 2016 and the Closed Session Minutes of the Joint Hospital Board of Directors and Corporate Compliance/Privacy and Internal Audit Committee Meeting of November 9, 2016 by a vote of all members present (Anolik Shakked, Hartman, Sublett, Zoglin). Director Chiu was absent.</p> <p>Dates for FY18 will be determined at the March meeting.</p>	
<p>10. AGENDA ITEM 16: ADJOURNMENT</p>	<p>Motion: To adjourn at 6:49 pm.</p> <p>Movant: Sublett Second: Hartman Ayes: Anolik Shakked, Hartman, Sublett, Zoglin Noes: None Abstentions: None Absent: Chiu Recused: None</p>	<p><i>Meeting adjourned at 6:49pm.</i></p>

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, Corporate Compliance/
 Privacy and Internal Audit Committee