



Minutes of the Open Session of the
Corporate Compliance/Privacy and Internal Audit Committee
Thursday, January 18, 2018
El Camino Hospital | Conference Room E
2500 Grant Road, Mountain View, CA 94040

Members Present

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

Members Absent

Robert Rebitzer

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 5:01pm by Chair Anolik Shakked. A silent roll call was taken. Committee Member Bob Rebitzer was absent. Ms. Fligor joined the meeting at 5:02pm during Agenda Item 4: Consent Calendar. Mr. Zoglin joined at 5:08pm during Agenda Item 5: Policies for Approval. All other Committee members were present at roll call.	
2. POTENTIAL CONFLICT OF INTEREST DISCLOSURES	Chair Anolik Shakked 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 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: Meeting Minutes of the Open Session of the Corporate Compliance/Privacy and Internal Audit Committee (November 16, 2017).</p> <p>Movant: Sublett Second: Hartman Ayes: Anolik Shakked, Fligor, Hartman, Sublett Noes: None Abstentions: None Absent: Rebitzer, Zoglin Recused: None</p>	<i>Consent Calendar approved</i>
5. REPORT ON BOARD ACTIONS	Ms. Fligor reported that at its January 16, 2018 meeting the District Board appointed two new Hospital Board members, Mr. Gary Kalbach and Ms. Julie Kliger. Ms. Fligor also described the application and appointment process.	
6. POLICIES FOR APPROVAL	<p>Diane Wigglesworth, Sr. Director, Corporate Compliance, explained that the Government Investigations policy incorporates edits from outside counsel and the comments from the Committee from the last time it was reviewed.</p> <p>Ms. Sublett and staff discussed how the policy and practice should be mindful of the fact that not everyone carries business cards.</p> <p>In response to Ms. Fligor's questions, Mary Rotunno, General Counsel, noted that the deletions proposed by outside counsel removed language</p>	

	<p>that could be construed as obstruction of justice. Ms. Rotunno and the Committee also discussed the role of the “Employee in Charge” referenced in the policy.</p> <p>Ms. Wigglesworth described the changes to the Physician Financial Arrangements policy, which is being reviewed by both the Finance and Compliance Committees. These changes include providing the summary report of financial arrangements annually instead of twice per year and updating the policy to reflect current practice. There were no additional questions from the Committee.</p> <p>Motion: To recommend that the Board approve the policies: Government Investigations and Physician Financial Arrangements – Review and Approval.</p> <p>Movant: Sublett Second: Hartman Ayes: Anolik Shakked, Fligor, Hartman, Sublett, Zoglin Noes: None Abstentions: None Absent: Rebitzer Recused: None</p>	
<p>7. REVIEW EMPLOYEE IT SECURITY/HIPAA AWARENESS TRAINING CONTENT</p>	<p>Ms. Wigglesworth reviewed the outline of the content covered in IT Security and HIPAA Awareness training modules. She noted that upon completion of the training, employees must attest to a confidentiality statement and a new acceptable use workforce communication procedure.</p> <p>Ms. Wigglesworth explained that the training content is tailored to each employee’s specific role and that these modules are completed annually. The Committee recommended that new hires complete these modules within a maximum of 30 days of initial employment, if that is not already ECH practice.</p> <p>The Committee requested additional information about the process when an employee changes positions within ECH, which may require different training and access.</p>	<p><i>Staff to provide additional information about access/training related to position changes</i></p>
<p>8. KPIs, SCORECARD, AND TRENDS</p>	<p>Ms. Wigglesworth reported that the number of investigations is trending down slightly. She noted that privacy breaches are increasing compared to the prior year. She highlighted that billing and coding incidents are trending down, which aligns with the timing of the implementation and socialization of Epic. She also described some of the events self-reported by the Hospital to the California Department of Public Health (CDPH) in FY18 including unplanned power outages and retained objects (even if a patient was admitted with a retained object). Ms. Wigglesworth noted that ECH has a conservative reporting culture and a good relationship with CDPH.</p>	
<p>9. ADJOURN TO CLOSED SESSION</p>	<p>Motion: To adjourn to closed session at 5:28pm pursuant to <i>Gov’t Code Section 54957.2</i> for approval of Minutes of the Closed Session of the Corporate Compliance/Privacy and Internal Audit Committee Meeting (November 16, 2017); pursuant to <i>Gov’t Code Section 54956.9(d)(2)</i> – conference with legal counsel – pending or threatened litigation: for information (Compliance Log, Privacy Log, Internal Audit Follow Up, Internal Audit Work Plan, Committee Pacing Plan); pursuant to <i>Gov’t Code Section 54956.9(d)(2)</i> – conference with legal counsel – pending or threatened litigation: Report on Internal Audit Activity; pursuant to <i>Health and Safety Code Section 32106(b)</i> for a report involving health care facility trade secrets; ERM Activity and Framework; pursuant to</p>	<p><i>Adjourned to closed session at 5:28pm.</i></p>

	<p><i>Gov't Code Section 54956.9(d)(2)</i> – conference with legal counsel – pending or threatened litigation: IT Security Discussion; pursuant to <i>Gov't Code Section 54957</i> for discussion and report on personnel matters: Executive Session.</p> <p>Movant: Sublett Second: Fligor Ayes: Anolik Shakked, Fligor, Hartman, Sublett, Zoglin Noes: None Abstentions: None Absent: Rebitzer Recused: None</p>	
<p>10. AGENDA ITEM 17: RECONVENE OPEN SESSION/ REPORT OUT</p>	<p>Open session was reconvened at 7:09pm. Agenda Items 9-16 were covered in closed session.</p> <p>During the closed session, the Committee approved the Closed Session Minutes of the Corporate Compliance/Privacy and Internal Audit Committee Meeting (November 16, 2017) by a unanimous vote of all members present (Anolik Shakked, Fligor, Hartman, Sublett, Zoglin). Mr. Rebitzer was absent.</p>	
<p>11. AGENDA ITEM 18: ADJOURNMENT</p>	<p>Motion: To adjourn at 7:10 pm.</p> <p>Movant: Sublett Second: Fligor Ayes: Anolik Shakked, Fligor, Hartman, Sublett, Zoglin Noes: None Abstentions: None Absent: Rebitzer Recused: None</p>	<p><i>Meeting adjourned at 7:10pm.</i></p>

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

Sharon Anolik Shakked
Chair, Corporate Compliance/
Privacy and Internal Audit Committee