**COLUMBIA COUNTY COMMUNITY HEALTHCARE CONSORTIUM, INC.**

**MEETING NOTES**

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| **Committee: Corporate Compliance** | | | | **Date: March 3, 2021** |
| **Attending Members: Art Proper, Theresa Lux, Lisa Thomas and Claire Parde** | | | | |
| **Absent Members: None** | | **Facilitator: Claire Parde** | **Scribe: Lisa Thomas** | |
| **TOPIC DISCUSSED** | **DISCUSSION SUMMARY** | | | |
| Inappropriate Receipt of Confidential Information | There has been one instance in 2021 via regular mail.  There were 15 instances in 2020 via fax and regular mail.  There were 12 instances in 2019 via fax and regular mail. | | | |
| Breaches of Confidential Information | There have been no breaches of confidential information by the Healthcare Consortium. | | | |
| Medicaid Exclusions | The Office Manager performs these monthly for staff and Board members. There have been no findings. | | | |
| Concern with ICAN Program | The Consortium subcontracts with the Healthy Capital District Initiative (HCDI) in Albany to administer the Independent Consumer Advocacy Network (ICAN) Program in Columbia and Greene Counties. Statewide, ICAN is funded by the NYSDOH in a contract with the Community Service Society (CSS) in NYC. The ICAN Program Director at CSS provides guidance to ICAN program staff across the state through a listserv and regular calls. There are several instances in which he has provided guidance, either verbally or in writing, that our staff felt was misleading or unethical. Claire reached out to HCDI to inquire about a reporting mechanism for our concerns, but did not receive a favorable response. Lisa made an inquiry with the NYSDOH about how best to report our concerns, and was instructed to email Commissioner Howard Zucker. Following a discussion, the Committee agreed that we should report our concerns to the Commissioner. | | | |
| Internal Audits for Transportation | There have been changes to NYS Social Services Law, which mandates compliance programs for many Medicaid providers. While the Consortium is not required to follow this guidance (given the relatively small amount of Medicaid business we do, solely through our Transportation Program), we feel it is good practice to do so. The one area we are lacking in is internal audits. OMIG will be releasing guidance on this. When the guidance is released, the Consortium will develop and implement a plan. We may ultimately need to include NY Connects, as NYSOFA, which funds the program, is seeking ways in which to claim Medicaid reimbursement for the services provided through it. | | | |
| Corporate Compliance Training | Training for the Board will take place April 7th. Members will need to complete the Disclosure of Financial Interests Form and sign the Code of Ethical Conduct Attestation Form. Claire would like to revise the disclosure form. She will send a draft to the Committee for feedback from the Committee. Training slides will be updated to reflect the changes. | | | |
| **Next Meeting** | **Wednesday, May 5, 2021 at 10:00 a.m.** | | | |