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

**MEETING NOTES**

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| **Committee: Corporate Compliance** | | | **Date: March 1, 2023** |
| **Board Members Attending: Art Proper and Theresa Lux** | | **Board Members Absent: Dan Almasi and Dorothy Urschel** | |
| **Staff Members Attending: Lisa Thomas and Claire Parde** | | | |
| **TOPIC DISCUSSED** | **DISCUSSION SUMMARY** | | |
| Inappropriate Receipt of Confidential Information | There have been eleven (11) instances in 2022 and none thus far in 2023. The agencies that had incorrectly transmitted the information were notified, the documents were destroyed, and the log was updated. | | |
| Breaches of Confidential Information | There have been no breaches of confidential information by the Healthcare Consortium. | | |
| Medicaid Exclusions | The Office Manager performs Medicaid Exclusion checks for staff and Board members on a monthly basis. No person who has been scrutinized in this way has been found to have a history of Medicaid fraud. | | |
| Annual Corporate Compliance Training and Completion of Disclosure of Financial Interests Form | The Committee discussed the annual training for the Board, the Disclosure of Financial Interests Form, and the annual memo that is issued to staff. The Committee recommended that the board training include a slide on the new communication procedure (see discussion below); Lisa will make that change.  Following the training at the Board meeting on Wednesday, April 5, Lisa will send out all necessary documents and forms to Board members via email and will give Board members two weeks to complete and return the forms. She and Claire will review all disclosure forms before the next meeting to make sure they are complete. Lisa will also provide a brief overview of the Consortium’s Compliance Plan for staff at the April staff meeting. | | |
| Code of Ethical Conduct Attestations | As was discussed last year, Board members only need to review and sign the Code of Ethical Conduct Attestation at appointment to the Board; staff only need to do so upon hire. Lisa will review all forms each year to ensure that we have a signed form from each board and staff member. | | |
| New procedure for communicating with members and Committee Chairs following Disclosure Form review | The Consortium has become aware of a practice employed by the Albany Med Health System that we might consider adopting. At Albany Med, when a Board Member discloses an interest that may give rise to a conflict, the Compliance Officer will send out a notice to the Member acknowledging the potential conflict and laying out mitigation measures. Committee members think this is a good idea and think all members should receive a communication whether there is a conflict or not. | | |
| Other Discussion | Theresa let the Committee know that as of January 1, 2023, she has taken on the role of President of the Greene County Rural Health Network. As they currently don’t have an Executive Director, this will be an active role.  We anticipate having three new members joining the Board in April, all of whom will be asked to complete disclosure forms prior to their election. Victoria McGahan recently joined the Board on behalf of CCDOH but has not been asked to complete a disclosure form as yet; Claire will attempt to get a disclosure form from Victoria before she goes out on leave. | | |
| Next Meeting | **Wednesday, May 3rd at 10:00 a.m.** | | |