

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

Committee: Corporate Compliance		Date: March 6, 2024
Board Members Attending: Art Proper (Chair), Dan Almasi, Theresa Lux and Dorothy Urschel		Board Members Absent: None
Staff Members Attending: Lisa Thomas and Claire Parde		
TOPIC DISCUSSED	DISCUSSION SUMMARY	
Inappropriate Receipt of Confidential Information	There have been two instances when the Consortium has received confidential that it should not have since the last meeting. In both instances, the sending agency was notified, documents were shredded, and the internal log was completed.	
Breaches of Confidential Information	<p>There have been two breaches of confidential information by the Healthcare Consortium:</p> <ol style="list-style-type: none"> 1. In November 2023, an unencrypted email was sent to the NYSDOH. The staff person who sent the email recognized her mistake immediately and promptly reported it. Because the email contained sensitive information that was not encrypted NYSDOH considered it a breach; however, since it reached the intended recipient and only that recipient, no further action was needed. 2. The second instance occurred in February 2024. A staff person mailed a NY Connects intake form, which contained sensitive information, to another client. The client receiving the letter did not open it but had his Care Coordinator from MHA open it. That staff person immediately notified our staff member and returned the intake form to her. <p>Following each of these instances, our internal tracking form was updated. Additionally, both staff were counseled and given tips to ensure these occurrences aren't repeated.</p>	
Medicaid Exclusions	The Corporate Compliance Officer performs Medicaid Exclusion checks for staff and Board members monthly. No person who has been scrutinized in this way has been found to have a history of Medicaid fraud.	
Review of Disclosure of Financial Interest Forms	The Committee received and reviewed disclosure forms for the following individuals: Maria Ostrander, Jolene Race, and Karen Amanna. Lisa will send out a notice to Maria Ostrander that outlines the findings of the Committee's review of her disclosure. If there are potential conflicts noted, this will be communicated. If there is an interest that could give rise to a conflict, this will be noted, and mitigation measures will be outlined. Committee Chairs will also be notified of any potential conflicts. A similar notice will be sent to Jolene Race and Karen Amanna once they have been elected to the Board of Directors in April. Lisa will also	

	obtain a signed Code of Ethical Conduct Attestation from each member. Medicaid Exclusion Checks have been completed for each.
Corporate Compliance Training for the Board	The training slides were reviewed. Lisa will make sure slide 8, which outlines instructions for completing the Disclosure of Financial Form, matches up with the current form. A slide will be added about Medicaid billing regarding separation of duties and testing.
Disclosure of Financial Interests Form	No changes were recommended, but Lisa will remind Members during the training that “more is better,” and we’ll sift through the information provided for relevance.
Corporate Compliance Memo issued to staff	The Consortium considers April to be “Corporate Compliance Month” during which staff are trained and provided with a memo about reporting options. The Committee reviewed the memo and recommended minor changes (correction to email and name of office). Lisa will make those changes and send the memo out to staff next month. Staff will also be asked to view the Corporate Compliance video made last year.
Next Meeting	Wednesday, May 1st at 10:00 a.m. This will be two hours in length in order to complete the review of all Disclosure of Financial Interests Forms.