

September 15, 2022

TO: Legal Counsel

News Media

Salinas Californian
El Sol
Monterey County Herald
Monterey County Weekly
KION-TV
KSBW-TV/ABC Central Coast
KSMS/Entravision-TV

The next regular meeting of the **CORPORATE COMPLIANCE AND AUDIT COMMITTEE - COMMITTEE OF THE WHOLE** of the Salinas Valley Memorial Healthcare System will be held **TUESDAY, SEPTEMBER 20, 2022, at 5:00 P.M.**, in the **DOWNING RESOURCE CENTER, CEO CONFERENCE ROOM 117 at SALINAS VALLEY MEMORIAL HOSPITAL, 450 E. ROMIE LANE, SALINAS, CALIFORNIA, or VIA TELECONFERENCE** (Visit svmh.com/virtualboardmeeting for Access Information).

Pursuant to SVMHS Board Resolution No. 2022-12, Assembly Bill 361, and guidance from the Monterey County Health Department in response to concerns regarding COVID-19, Board Members of Salinas Valley Memorial Healthcare System, a local health care district, are permitted to participate in this duly noticed public meeting via teleconference and certain requirements of The Brown Act are suspended.



Pete Delgado
President/Chief Executive Officer

Committee Members: Juan Cabrera, Chair; Joel Hernandez Laguna, Vice Chair; Pete Delgado, President/CEO; Augustine Lopez, CFO; Mike Nolan, Community Member; and Sanjeev Tandon, Community Member

**CORPORATE COMPLIANCE AND AUDIT COMMITTEE MEETING
SEPTEMBER 2022 - COMMITTEE OF THE WHOLE
SALINAS VALLEY MEMORIAL HEALTHCARE SYSTEM**

**TUESDAY, SEPTEMBER 20, 2022
5:00 P.M. – DOWNING RESOURCE CENTER, CEO CONFERENCE ROOM 117
SALINAS VALLEY MEMORIAL HOSPITAL
450 E. ROMIE LANE, SALINAS, CALIFORNIA
AND VIA TELECONFERENCE
(Visit svmh.com/virtualboardmeeting for Access Information)**

Pursuant to SVMHS Board Resolution No. 2022-12, Assembly Bill 361, and guidance from the Monterey County Health Department in response to concerns regarding COVID-19, Board Members of Salinas Valley Memorial Healthcare System, a local health care district, are permitted to participate in this duly noticed public meeting via teleconference and certain requirements of The Brown Act are suspended.

AGENDA

1. Approval of Minutes from the Corporate Compliance and Audit Committee Meeting of June 21, 2022 (DELGADO)

- Motion/Second
- Action by Committee

2. Compliance Officer Report (LOPEZ/JAENICKE)

3. Public Input

This opportunity is provided for members of the public to make a brief statement, not to exceed three (3) minutes, on issues or concerns within the jurisdiction of this District Board which are not otherwise covered under an item on this agenda.

4. Closed Session

5. Reconvene Open Session/Report on Closed Session

6. Adjournment

The Corporate Compliance and Audit Committee meets quarterly. The next meeting is scheduled for **Tuesday, December 13, 2022 at 5:00 p.m.**

This Committee meeting may be attended by Board Members who do not sit on this Committee. In the event that a quorum of the entire Board is present, this Committee shall act as a Committee of the Whole. In either case, any item acted upon by the Committee or the Committee of the Whole will require consideration and action by the full Board of Directors as a prerequisite to its legal enactment.

The Committee packet is available at the Committee Meeting, at www.svmh.com, and in the Human Resources Department of the District. All items appearing on the agenda are subject to action by the Committee.

Requests for a disability related modification or accommodation, including auxiliary aids or services, in order to attend or participate in a meeting should be made to the Board Clerk during regular business hours at 831-755-0741. Notification received 48 hours before the meeting will enable the District to make reasonable accommodations.

**CORPORATE COMPLIANCE AND AUDIT COMMITTEE MEETING OF THE
BOARD OF DIRECTORS – COMMITTEE OF THE WHOLE
SALINAS VALLEY MEMORIAL HEALTHCARE SYSTEM**

AGENDA FOR CLOSED SESSION

Pursuant to California Government Code Section 54954.2 and 54954.5, the board agenda may describe closed session agenda items as provided below. No legislative body or elected official shall be in violation of Section 54954.2 or 54956 if the closed session items are described in substantial compliance with Section 54954.5 of the Government Code.

CLOSED SESSION AGENDA ITEMS

REPORT INVOLVING TRADE SECRET

(Government Code §37606 & Health and Safety Code § 32106)

Discussion will concern: (Specify whether discussion will concern proposed new service, program, or facility): Trade Secret, Strategic Planning, Proposed New Programs and Services

Estimated date of public disclosure: (Specify month and year): Unknown

ADJOURN TO OPEN SESSION

**MINUTES OF THE JUNE 2022
CORPORATE COMPLIANCE AND AUDIT COMMITTEE MEETING
COMMITTEE OF THE WHOLE
SALINAS VALLEY MEMORIAL HEALTHCARE SYSTEM**

**TUESDAY, JUNE 21, 2022
5:00 P.M. – DOWNING RESOURCE CENTER, ROOMS A, B & C
SALINAS VALLEY MEMORIAL HOSPITAL
450 E. ROMIE LANE, SALINAS, CALIFORNIA
OR VIA TELECONFERENCE**

Pursuant to SVMHS Board Resolution No. 2022-08, Assembly Bill 361, and guidance from the Monterey County Health Department in response to concerns regarding COVID-19, Board Members of Salinas Valley Memorial Healthcare System, a local health care district, are permitted to participate in this duly noticed public meeting via teleconference and certain requirements of The Brown Act are suspended.

Committee Members Present: In person: Pete Delgado, Joel Hernandez Laguna, Augustine Lopez, Via teleconference: Juan Cabrera, Chair, Mike Nolan.

Committee Members Absent: Sanjeev Tandon

Other Board Members Present, Constituting Committee of the Whole: None

A quorum was present and the meeting was called to order at 5:00 p.m. by Juan Cabrera.

APPROVE THE MINUTES OF MARCH 22, 2022

Corporate Compliance and Audit Committee meeting minutes of March 22, 2022.

No public input received.

MOTION: Upon motion by Committee member Delgado, and second by Committee member Hernandez Laguna, the minutes of March 22, 2022 were approved.

Ayes: Delgado, Hernandez Laguna, Nolan, and Chair Cabrera; Noes: None; Abstentions: Lopez; Absent: Tandon; Motion Carried.

COMPLIANCE OFFICER REPORT

Renée Jaenicke, Director of Internal Audit and Compliance, provided a comprehensive Compliance Officer Report. This information was included in the Committee packet. The following topics were reviewed and discussed:

- Compliance and Ethics best practices and the importance of asking questions.
- Statements of Economic Interest as of May 27, 2022 Annual Requirements 100% complete.
- Promoting Interoperability: The Electronic Health Reporting (EHR) Incentive Program “Meaningful Use” attestation requirement is an optional CMS incentive program. Core measures and weighting of results are updated every year intended to demonstrate meaningful use of Certified EHR Technology (CEHRT). SVMH has completed attestation and met State and Federal requirements each year since the beginning of the program (2011)
- Electronic Clinical Quality Measures (eCQMs) are part of the Promoting Interoperability requirement and were completed timely
- Action Plans Due Dates were reviewed.

PUBLIC INPUT

No public input received.

CLOSED SESSION

Juan Cabrera, Chair, announced the items to be discussed in Closed Session are *Trade Secret: Trade secrets, strategic planning/proposed new services and programs* and *Hearings/Reports*. The meeting was recessed into Closed Session under the Closed Session protocol at 5:18 p.m.

RECONVENE OPEN SESSION/REPORT ON CLOSED SESSION

The Committee reconvened Open Session at 6:03 p.m. Juan Cabrera reported that in Closed Session, the Committee discussed: *Trade Secret: Trade secrets, strategic planning/proposed new services and programs* and *Hearings/Reports*. No action was taken in the Closed Session.

ADJOURNMENT

There being no other business, the meeting was adjourned at 6:04 p.m. The June 2022 Corporate Compliance and Audit Committee Meeting is scheduled for **Tuesday, June 21, 2022, at 5:00 p.m.**

Juan Cabrera, Chair
Corporate Compliance and Audit Committee

/KmH



Corporate Compliance and Audit
Committee
September 20, 2022



Topics

- Education
- Update on Compliance Efforts
 - Sanctions/Exclusions Checking
 - Compliance Dashboard
- Questions/Comments

Compliance and Ethics Education

Types of Conflict of Interest

The term “conflict of interest” may have different meanings for different individuals. Following are some types for your consideration:

- Your own interests are opposed to the interests of the organization, which may stop you from acting objectively on behalf of SVMHS.
- Your interest in SVMHS success causes you to give false/inaccurate information to a third party.
- You become too sympathetic to the interests of another, causing you to accept their work or their assertions with little or no review.
- Work needing review by someone else is not reviewed because you are the one who performed it and you know it’s right.
- Your interest in receiving a bonus impacts your decisions in a way that causes adverse consequences to SVMHS.
- You feel forced to devalue your judgement due to intimidation by someone else.

If you believe that any of these apply to you or someone else, contact:

<http://www.ethicspoint.com>

888-274-8231 – Ethics Point

You may report concerns anonymously.

Compliance Officer (831) 759-1958

Sanctions/Exclusions Checking

- Federal and California law enforce penalties against an organization that “arranges or contracts (by employment or otherwise) with an individual or entity that the person knows or should know is excluded from participation in a Federal health care program, for the provision of items or services for which payment may be made under such a program. [42 U.S.C. § 1320a-7a(6); 42]
- “OIG [Office of Inspector General] updates the LEIE [List of Excluded Individuals and Entities] monthly, so screening employees and contractors each month best minimizes potential

**Special Advisory Bulletin on the
Effect of Exclusion from Participation
in Federal Health Care Programs**

ivil Mo
IG date



U.S. DEPARTMENT OF HEALTH & HUMAN SERVICES
OFFICE OF INSPECTOR GENERAL



Issued May 8, 2013

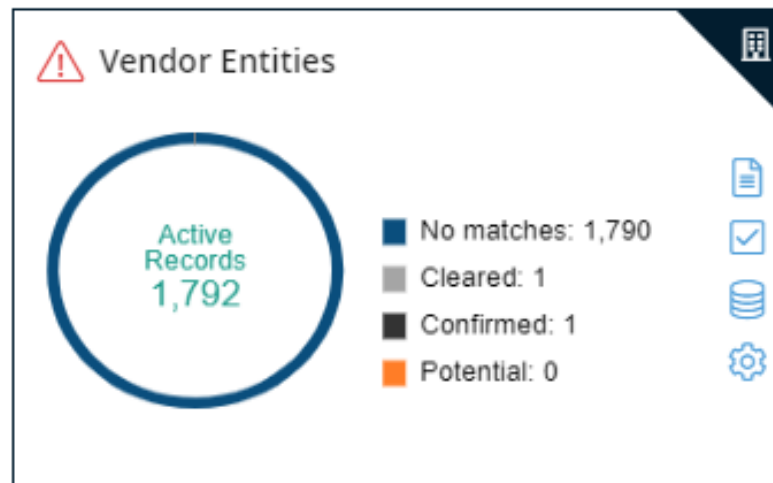
Checks Performed

Population	Initial Check	Periodic Check	Reviewed
Employees	Human Resources	Monthly	Monthly
Travelers, Registry	Human Resources	Monthly	Monthly
Physicians - privileged	Medical Staff Services	Monthly	Quarterly
Physicians - others	Cypress	Monthly	Quarterly
Volunteers	Volunteer Office	Monthly	Monthly
Contractors/Vendors	At least the following: <ul style="list-style-type: none"> Office of Inspector General Department of Public Works Department of Corrections Department of Industrial Relations Department of Transportation Department of Public Health Department of Social Services Department of Education Department of Agriculture Department of Fish and Game Department of Parks and Recreation Department of Public Safety Department of Transportation Department of Water Resources Department of Wildlife Conservation Department of Industrial Relations Department of Public Health Department of Social Services Department of Education Department of Agriculture Department of Fish and Game Department of Parks and Recreation Department of Public Safety Department of Transportation Department of Water Resources Department of Wildlife Conservation 	Streamline Verify application	Monthly

- General Services Administration List of organizations, which lists whether or not an organization is excluded from doing business with the Federal Government
- California Medi-Cal exclusion list

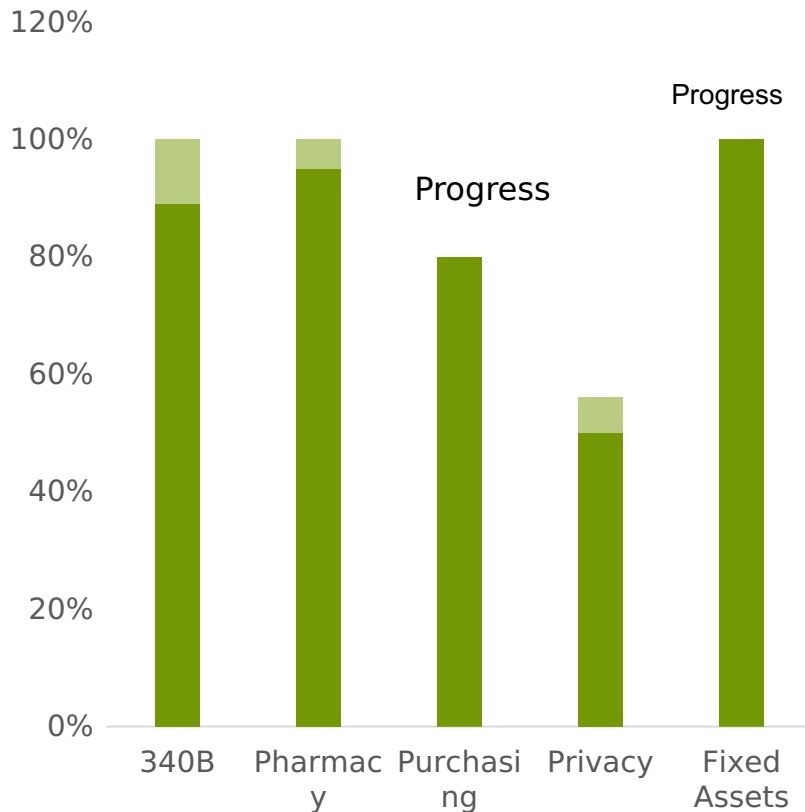
Streamline Verify

- Recently implemented for screening all potential, new, or active vendors.
- Automatically obtains and searches the active vendor list maintained by Accounts Payable, using secure network protocol.
- Has already successfully prevented payments to an excluded vendor.
- Easy to manage.

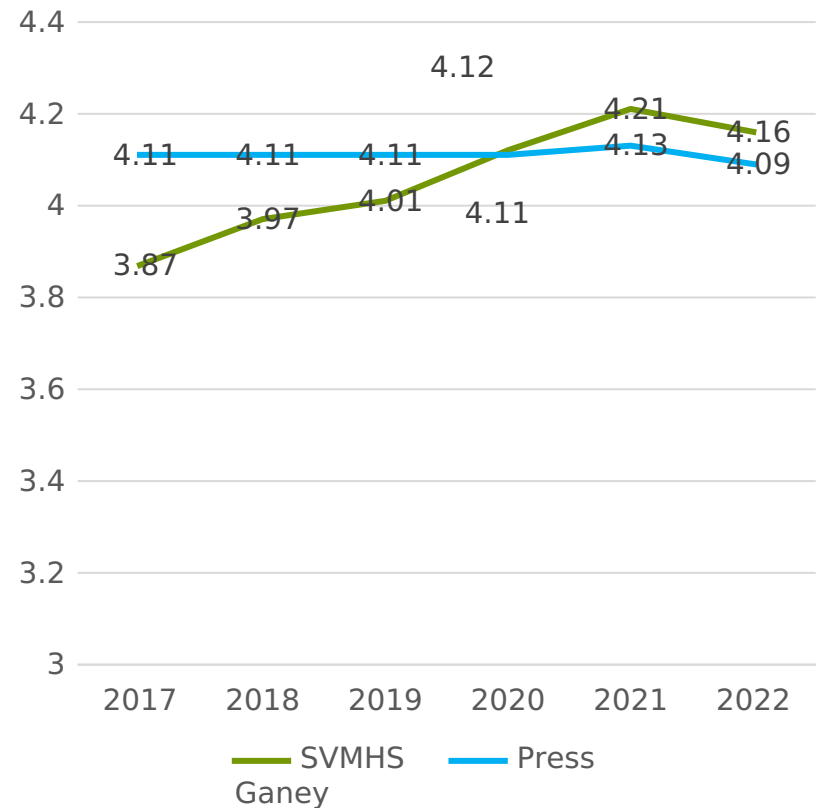


Corporate Compliance and Audit Dashboard

COMPLETED ACTION PLANS

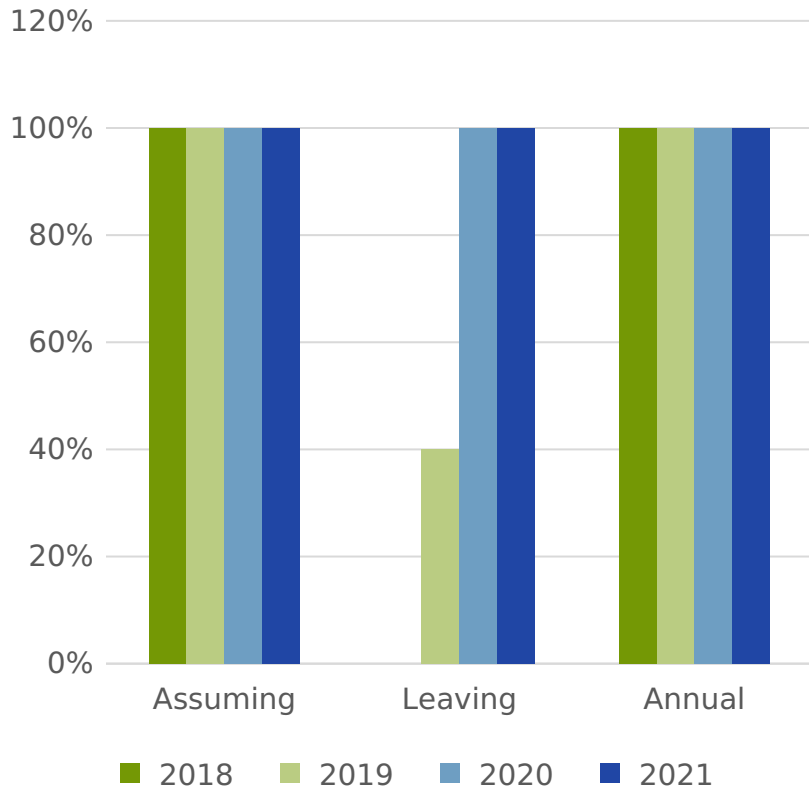


PRESS GANEY SURVEY ETHICS SCORE

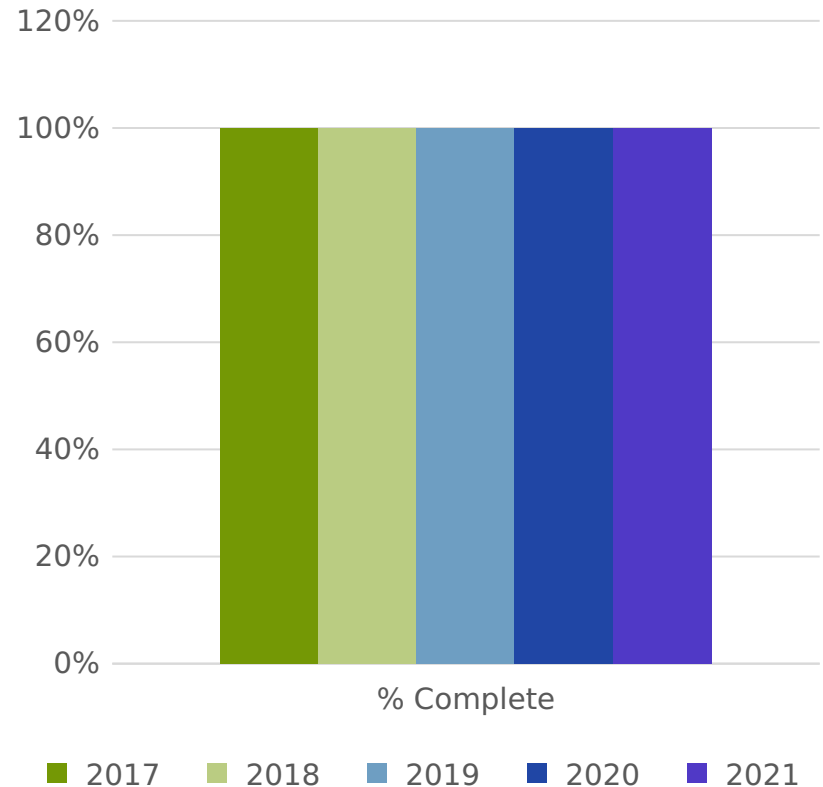


Corporate Compliance and Audit Dashboard (Cont'd.)

STATEMENTS OF ECONOMIC INTEREST - FORM 700

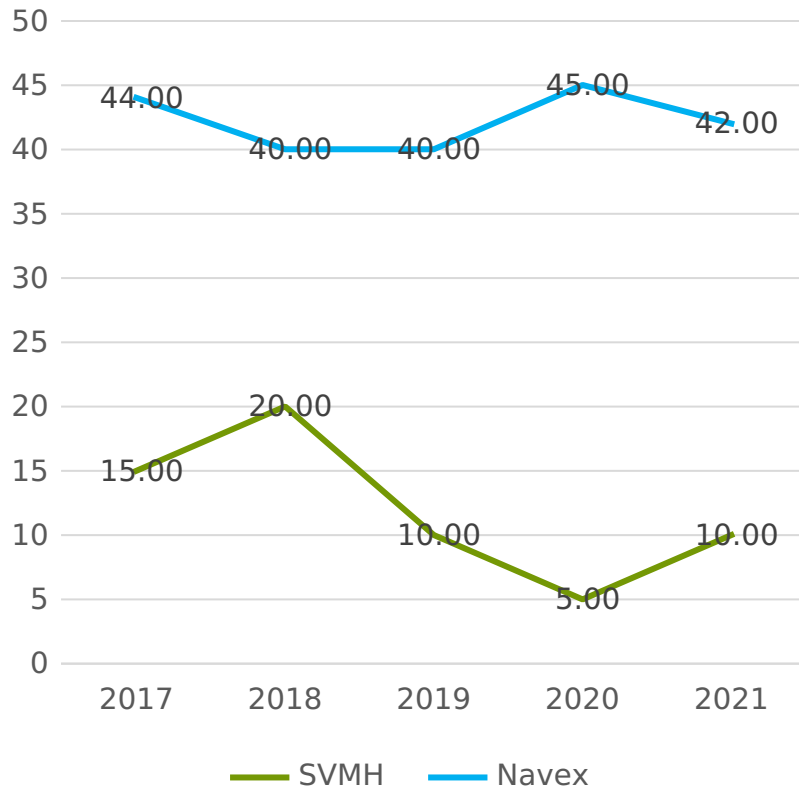


AB 1234 ETHICS TRAINING COMPLETED

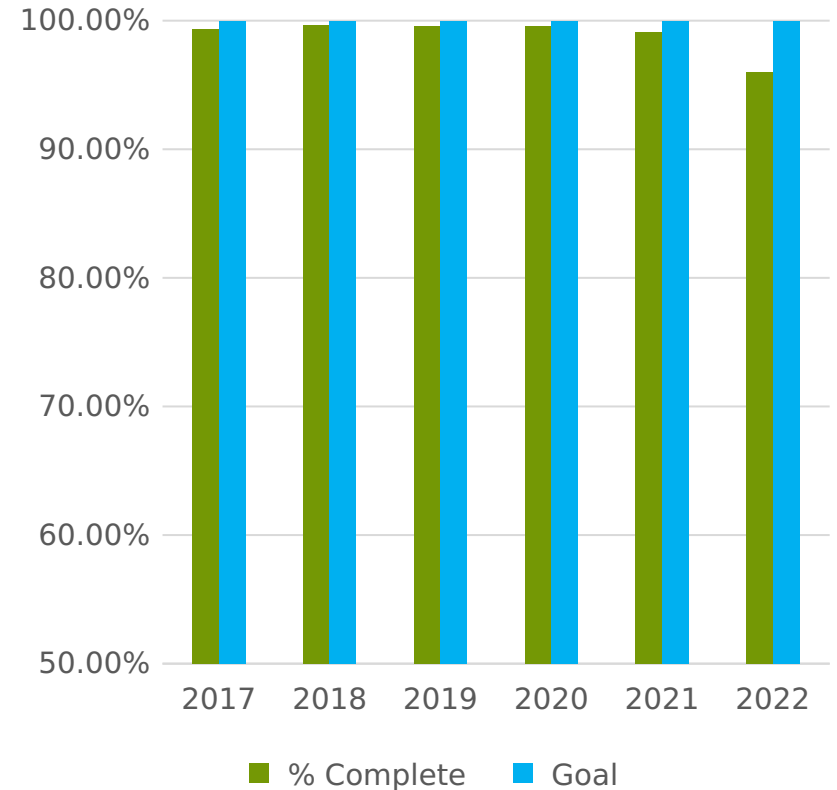


Corporate Compliance and Audit Dashboard (Cont'd.)

COMPLIANCE HOTLINE MEDIAN DAYS TO CLOSE ISSUE



COMPLETION OF STAFF EDUCATION BY DUE DATE





Questions/Comments

PUBLIC INPUT

CLOSED SESSION

*(Report on Items to be
Discussed in Closed Session)*

*RECONVENE OPEN SESSION/
REPORT ON CLOSED SESSION*

ADJOURNMENT

*THE CORPORATE COMPLIANCE AND
AUDIT COMMITTEE MEETS
QUARTERLY.*

*THE NEXT MEETING IS SCHEDULED
FOR TUESDAY, DECEMBER 13, 2022,
AT 5:00 P.M.*