

June 16, 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, JUNE 21 22, 2022, AT 5:00 P.M.**, in the **DOWNING RESOURCE CENTER, ROOMS A, B & C AT SALINAS VALLEY MEMORIAL HOSPITAL, 450 E. ROMIE LANE, SALINAS, CALIFORNIA, OR VIA TELECONFERENCE (Visit [svmh.com/virtualboardmeeting](http://svmh.com/virtualboardmeeting) for Access Information).**

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.



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  
JUNE 2022 - 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  
AND VIA TELECONFERENCE  
(Visit [svmh.com/virtualboardmeeting](http://svmh.com/virtualboardmeeting) for Access Information)**

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.

**AGENDA**

1. Approval of Minutes from the Corporate Compliance and Audit Committee Meeting of MARCH 22, 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

(See Attached Closed Session Sheet information)

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, September 20, 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](http://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 Executive Assistant during regular business hours at 831-755-0741. Notification received 48 hours before the meeting will enable the District to make reasonable accommodations.

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

**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): \_\_\_\_\_

**Estimated date of public disclosure:** (Specify month and year): \_\_\_\_\_

**HEARINGS/REPORTS**

(Government Code §37624.3 & Health and Safety Code §§1461, 32155)

**Subject matter:** (Specify whether testimony/deliberation will concern staff privileges, report of medical audit committee, hospital internal audit report, or report of quality assurance committee):

- 1. \_\_\_\_\_ Update

**ADJOURN TO OPEN SESSION**

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

**TUESDAY, MARCH 22, 2022  
12:00 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. 2022-02, 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, Augustine Lopez, Via teleconference: Juan Cabrera, Chair, Joel Hernandez Laguna, Vice 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 5:02 p.m. by Juan Cabrera.

**Approval of Minutes From the Corporate Compliance and Audit Committee Meeting of December 14, 2021**

Pete Delgado, President/Chief Executive Officer, recommended the Corporate Compliance and Audit Committee approve the minutes of the Corporate Compliance and Audit Committee Meeting of December 14, 2021. This information was included in the Committee packet.

No Public Comment.

MOTION: The Corporate Compliance and Audit Committee approves the minutes of the Corporate Compliance and Audit Committee Meeting of December 14, 2021, as presented.

Moved/Seconded/Roll Call Vote: Ayes: Cabrera, Hernandez Laguna, Delgado, Lopez, Nolan; Noes: None; Abstentions: None; 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:

- Ethics and Compliance 6 Attributes of Courage
- Update on Compliance Efforts
  - Telemedicine Self-Assessment–SVMC: Telemedicine is on the OIG work plan. Telemedicine at SVMC (Including Taylor Farms Family Medical Clinic) has a designated person monitoring practices with processes and controls in place.
  - IT Asset Management: Audrey Parks, Chief Information Officer, reported on the benefits of IT asset management which includes software assets, total cost of ownership, systems security, standardization and service. Asset types include hardware, software, data assets, stationary and mobile assets, high value assets (network switches/routers, desktops, laptops, WOWs). Aaron Burnside, IT Manager, explained with the addition of the SVMC EPIC

system, workstations have doubled. IT now has the ability to wipe workstations or make them useless, and manage assets for risk and compliance. Security at SVMC is on par with the hospital's security.

- Biomed: High value assets (over \$5,000) which haven't been located for two (2) preventive maintenances require a secondary search by the department leader. Accounting sends a bi-monthly list of fixed assets to Biomed to review to determine if any assets should be removed from accounting records.
- Travelers' Invoice Review: Contract labor uses the internal timekeeping system for tracking hours. Traveler agencies bill hours based on data submitted. Rates are documented in traveler confirmation forms sent the Agencies to HR; these documents can be hundreds of pages long. HR, payroll and operations are working together to identify and improve the review process for billed rates.
- Accomplishments by Pillar were presented.
- Transition: Mr. Lopez announced Ms. Jaenicke is retiring April 1<sup>st</sup>. Ms. Jaenicke is collaborative and has brought our corporate compliance program up to a first-class level. Additionally, she has agreed to continue to support us until a replacement is found. Mr. Lopez announced Ms. Jaenicke has been elected to the Board of Directors of Association of Healthcare Internal Auditors.

Mr. Cabrera and Mr. Delgado thanked Ms. Jaenicke for her energy and contributions to the organization and willingness to support us during the transition.

### **No Public Input**

### **Closed Session**

Juan Cabrera, Chair, announced the item to be discussed in Closed Session is *Hearings/Reports*. The meeting was recessed into Closed Session under the Closed Session protocol at 5:40 p.m.

### **Reconvene Open Session/Report On Closed Session**

The Committee reconvened Open Session at 5:57 p.m. Juan Cabrera reported that in Closed Session, the Committee discussed: *Hearings/Reports*. No action was taken in the Closed Session.

### **Adjournment**

There being no other business, the meeting was adjourned at 5:58 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  
June 21, 2022



# Topics

- **Education**
- **Update on Compliance Efforts**
  - **Statements of Economic Interest (700 forms)**
  - **Promoting Interoperability Requirements**
  - **Follow-Up Status**
- **FEMA Update**
- **Questions/Comments**



# Compliance and Ethics

## “Because we’ve always done it this way.”

- How many times have we heard that the reason we do something a certain way is “because we’ve always done it this way”?
- In the healthcare industry today, many people are changing the way we pay for, render, and bill for healthcare because that answer is not enough. Examples:
  - One hospital in Central California lost over \$500,000 a year net because they did not bill for anesthesia for outpatients because they had “always done it this way.”
- When it comes to compliance, “we’ve always done it this way” may not mean it is right.
- It’s OK to ask questions.

**To ask questions or report a concern:**

<https://secure.ethicspoint.com/domain/media/en/gui/19058/index.html>

888-274-8231 – Ethics Point



# Statements of Economic Interest As of May 27, 2022

2022 Requirements	Due Dates	# Forms	% Complete by Due Date
Annual in 2022	April 1, 2022	72	100%
Assuming Office	Within 30 days of first date worked	4	100%
Leaving Office	Within 30 days of last date worked	5	100%

Ongoing monitoring of staff turnover to ensure compliance with requirements when subject positions transition

**CALIFORNIA FORM 700**  
FAIR POLITICAL PRACTICES COMMISSION

STATEMENT OF ECONOMIC INTERESTS  
COVER PAGE  
A PUBLIC DOCUMENT

Date Initial Filing Received  
*Filing Official Use Only*

# Promoting Interoperability

- **Electronic Health Reporting (E.H.R. Incentive Program) attestation requirement established in the American Recovery and Reinvestment Act (ARRA) in 2009.**
  - **Incentive payments began in 2011. Meaningful Use attestation established by CMS in 2011.**
  - **Reimbursement penalties for not attesting or not meeting requirements started in 2015.**
  - **Re-titled to “Promoting Interoperability” for dates effective CY 2018.**
- **Core measures and weighting of results are updated every year.**
- **Intent is to demonstrate meaningful use of Certified Electronic Health Record Technology (CEHRT).**
- ***SVMH has completed attestation and met requirements each year since the beginning of the program in 2011 at both State and Federal levels.***
- **Results subject to audit.**

# Promoting Interoperability 2021

Measure	Rating Basis	Comments
Security Risk Analysis	Yes/No	Conducted annually by CynergisTek.
Electronic Prescribing	%	Transmit prescriptions electronically using CEHRT.
Query of Prescription Drug Monitoring Program	Yes/No	Query Prescription Drugs Monitoring for prescription drug history on Schedule II narcotics.
Health Information Exchange	%	For transitions of care, create a summary of care record using CEHRT and electronically exchange it.
Provider to Patient Exchange	%	Provide patients with timely access to view online, download, and transmit their health information using CEHRT.
Public Health and Clinical Data Exchange	Yes/No	Active engagement with a public health agency or clinical data registry to submit electronic health data using CEHRT.

Reporting is across any continuous 90-day period.  
SVMH used July-September 2021

# Electronic Clinical Quality Measures (eCQMs)

- Part of Promoting Interoperability Requirement
- We are required to select four (4) out of nine (9) measures and report for two quarters in 2021.
- Used Q1 and Q2 CY 2021.
- Due 2/28/2022.
- Completed timely.

**SALINAS VALLEY MEMORIAL HOSPITAL**  
CCN-050334

## Inpatient Quality Reporting (IQR)

Reporting Period Due: 3/31/2022

Last Updated: 2/2/2022 12:05 PM

eCQM



Submission Requirements Met

Required:

- In two discharge quarters, submit the same four measures.

Optional (encouraged):

- Submit extra measures in any quarter.
- Extra measures can be different in each quarter.

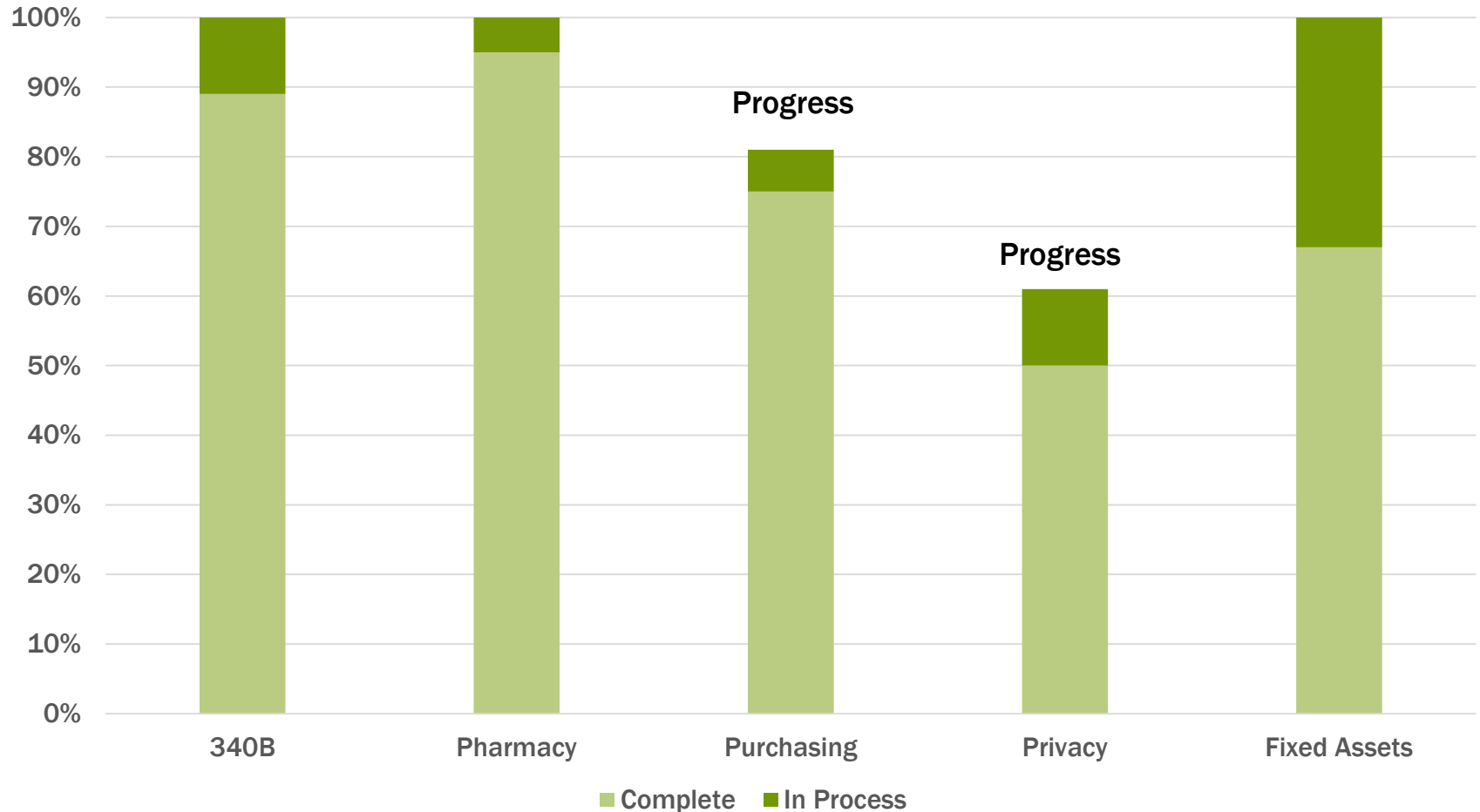
# Electronic Clinical Quality Measures (eCQMs)

Code	Requirement
STK-2	Patients with ischemic stroke prescribed or continuing to take antithrombotic therapy at hospital discharge
STK-3	Patients with ischemic stroke with atrial fibrillation/flutter prescribed or continuing to take anticoagulation therapy at hospital discharge
STK-5	Patients with ischemic stroke administered antithrombotic therapy by the end of hospital day 2
STK-6	Patients with ischemic stroke who are prescribed or continuing to take statin medication at hospital discharge

## Reviewed:

- Diagnosis codes
- Inpatient or outpatient
- Type of drug
- Date prescribed or administered
- Discharge date

# Action Plans Complete by Original 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, SEPTEMBER 20, 2022,  
AT 5:00 P.M.*