

# **Community Health Network of CT, Inc.**

## **Compliance Committee Charter**

### **I. Mission/Charge**

The Compliance Committee is responsible for providing guidance, reviewing, and approving compliance initiatives, policies, auditing and the overall Compliance and Ethics program. The Committee will ensure the compliance and ethics program is effective by monitoring compliance activities, such as training and employee awareness initiatives, to ensure all pertinent federal and state laws and regulations governing the health care industry are followed. The Committee will review reports of non-compliance issues and complaints and assure the appropriate corrective and/or disciplinary action is taken. Health Insurance Portability and Accountability Act (HIPAA) and privacy/ confidentiality issues will be incorporated into the Compliance Committee's monthly agenda to satisfy federal regulations and National Committee for Quality Assurance (NCQA) standards.

#### **HIPAA**

The Committee will review current business practices and identify strategic approaches to ensure CHNCT is in compliance with HIPAA standards. The Committee will monitor CHNCT's continuous progress in accomplishing the following initiatives:

- Conducting a detailed risk assessment and gap analysis;
- Evaluating/ revising vendor and provider contracts;
- Revising internal policy and procedures, as necessary;
- Ensuring compliance with all standards of the HIPAA regulations by the designated compliance date;
- Developing and implementing a staff training program;
- Establishing corporate and departmental privacy policies and procedures;
- Finalizing an implementation budget; and
- Notifying members of privacy rights.

#### **Privacy/ Confidentiality**

The Committee will ensure that CHNCT establishes and follows appropriate privacy/ confidentiality policies to protect various member and proprietary company information.

The Committee has the authority to review, revise and approve corporate and departmental policies and procedures regarding issues that may place CHNCT at risk of being non-compliant with laws and regulations that govern our business. The Committee makes decisions based on standards of the regulatory requirements as set forth by the laws of the State of CT, the CT Department of Social Services, and the Centers for Medicare and Medicaid Services (CMS), HIPAA requirements, and the National Committee for Quality Assurance (NCQA).

## II. Membership

**A. Composition:** The Compliance Committee is comprised of the following individuals:

- CHNCT Director, Government Affairs & Compliance
- CHNCT President & Chief Executive Officer
- CHNCT Vice President and Medical Director
- CHNCT Vice President and Chief Financial Officer
- CHNCT Vice President, Operations
- CHNCT Vice President, Health Services
- CHNCT Vice President, Human Resources
- CHNCT Chief Information and Security Officer

**B. Ad Hoc Members:** Ad hoc Committee members shall include CHNCT Directors. Ad hoc members may participate in committee discussions, but are not considered voting members and do not count towards quorum requirements.

**C. Membership Selection:** The President & Chief Executive Officer shall appoint Committee members.

**D. Terms:** Indefinite, at the discretion of the President & Chief Executive Officer.

## III. Officers

**A. Chair:** CHNCT Director, Government Affairs & Compliance.

## IV. Quorum and Voting

**A. Quorum:** A quorum shall consist of: the Chair, in addition to at least four (4) of the seven (7) voting CHNCT committee members.

**B. Voting Authority:** All committee members listed in Section II.A. shall be voting members.

**C. Voting Procedure:** All matters appropriately considered by the Committee for a decision shall be determined by a simple majority vote of those voting members present. Each voting member shall have one (1) vote. Votes may be cast by written ballot or telephonically in the event that an urgent matter arises and a quorum cannot be convened for a meeting.

**D. Parliamentary Procedure:** Unless stipulated otherwise, a modified form of Robert's Rules of Order shall govern meeting procedure.

**V. Meetings**

**A. Frequency:** The Committee shall meet no less than quarterly.

**B. Notice:** Notice of meetings shall be provided either via mail, telephone, e-mail or facsimile with an agenda mailed at least five (5) business days prior to the meeting date.

**VI. Confidentiality**

While de-identified, aggregate data may be disseminated by the Committee to specific work groups, other Committees, or providers of care, for the purpose of performance feedback, **all information concerning specific members or providers (including data that is identifiable down to the member or provider level), will be held in the strictest confidence by Committee members and no such data will be shared outside of the Committee, in any form, without the express permission and release authorization of the member or provider.**

**VII. Miscellaneous**

**A. Revisions to Charter:** Revisions to this Charter may be considered and adopted as necessary, by the President & Chief Executive Officer or Director, Government Affairs & Compliance.