

**TRI-CITY HEALTHCARE DISTRICT
 AGENDA FOR A REGULAR MEETING
 OF THE AUDIT, COMPLIANCE AND ETHICS COMMITTEE
 April 21, 2016
 8:30 a.m. – 10:30 a.m.
 Assembly Rm. 1
 Tri-City Medical Center, 4002 Vista Way, Oceanside, CA 92056**

The Committee may make recommendations to the Board on any of the items listed below, unless the item is specifically labeled "Informational Only"

	Agenda Item	Time Allotted	Action/ Recommendation	Requestor/ Presenter
1.	Call to order /Introductions	5 min.		Chair
2.	Approval of Agenda	2 min.		Chair
3.	Public Comments – Announcement Comments may be made at this time by members of the public and Committee members on any item on the Agenda before the Committee's consideration of the item or on any matter within the jurisdiction of the Committee. NOTE: During the Committee's consideration of any Agenda item, members of the public also have the right to address the Committee at that time regarding that item.	1 min.		Standard
4.	Ratification of Minutes- February 18, 2016	3 min.	Action	Chair
5.	New Business – Discussion and Possible Action A) Review and Discussion of Policies & Procedures: 1. 8610-210 - Review of Tri-City Medical Center Information by Board Members 2. 8750-558 - Responding to Compliance Issues – Introduction; General Policies (DELETE) 3. 8750-559 - Responding to Compliance Issues Introduction; Reports of Suspected Misconduct; Confidentiality B) Review and discussion of non-clinical contracts C) Organizational Compliance Committee Report D) Executive Compliance Committee Report E) Compliance Program Plan Update	20 min. 10 min. 5 min. 5 min. 15 min.	Discussion/ Possible Action Discussion/ Possible Action Information Only Information Only Information Only	K. Topp/C. Thompson CCO CCO CCO CCO
6.	Old Business – A) Policy and Procedure Grid – Information only	5 min.	Information Only	CCO
7.	Motion to go into Closed Session			
8.	Closed Session			

	Agenda Item	Time Allotted	Action/ Recommendation	Requestor/ Presenter
	a. Approval of Audit, Compliance & Ethics Closed Session Minutes of February 18, 2016 (Authority: Government Code Section 54957.2)	5 min.	Approve	Chair
9.	Motion to go into open session			
10.	Open Session			
11.	Report from Chairperson on any action taken in Closed Session (Authority: Government Code, Section 54957.1).	1 min.		
12.	Committee Communications	5 min.		All
13.	Date of Next Meeting May 19, 2016	1 min.		Chair
14.	Adjournment			Chair
15.	Total Time Budgeted for Meeting	1.5 hours		

Note: Any writings or documents provided to a majority of the members of Tri-City Healthcare District regarding any item on this Agenda will be made available for public inspection in the Administration Department located at 4002 Vista Way, Oceanside, CA 92056 during normal business hours.

Note: If you have a disability, please notify us at 760-940-3347 at least 48 hours prior to the meeting so that we may provide reasonable accommodations

Tri-City Medical Center
Audit, Compliance & Ethics Committee
February 18, 2016
Assembly Room 1
8:30 a.m-10:30 a. m.

Members Present: Director Ramona Finnilla (Chair); Director Larry W. Schallock; Director Laura Mitchell; Jack Cumming, Community Member; Kathryn Fitzwilliam, Community Member; Leslie Schwartz, Community Member

Non-Voting Members: Tim Moran (CEO); Steve Dietlin (CFO); Kapua Conley, COO; Cheryle Bernard-Shaw, CCO

Others Present: Diane Racicot, General Counsel; Teri Donnellan, Executive Assistant; John Blakey, CPA, Partner, Moss Adams; Devon Wiens, CPA, Partner, Moss Adams; Mary Nguyen, Senior Manager

Absent: Dr. Frank Corona, Medical Staff Member; Barton Sharp, Community Member

	Discussion	Action Recommendations/ Conclusions	Person(s) Responsible
1. Call to Order	The meeting was called to order at 8:30 a.m. in Assembly Room 3 at Tri-City Medical Center by Chairperson Finnilla.		
2. Approval of Agenda	It was moved by Mr. Leslie Schwartz and seconded by Director Schallock to approve the agenda as presented. The motion passed unanimously.	Agenda approved.	Ms. Donnellan
3. Comments by members of the public and committee members on any item of interest to the public before Committee's consideration of the item	There were no public comments.		
4. Ratification of minutes – January 21, 2016	It was moved by Mr. Jack Cumming and seconded Director Mitchell to approve the minutes as presented. The motion passed unanimously.	Minutes ratified.	Ms. Donnellan
5. New Business			
A) FY2016 Audit 1. Discussion of FY2016 Financial Statement Audit Proposal	Mr. Steve Dietlin stated Moss Adams has been our auditor for a number of years and is here today to propose the District retain Moss Adams for an additional year with a partner rotation and no change in fees.		

Discussion	Action Recommendations/ Conclusions	Person(s) Responsible
<p>Mr. Devon Wiens introduced Mr. John Blakely, Partner and Ms. Mary Nguyen, Senior Manager.</p> <p>Mr. Wiens provided background information on the firm, stating the firm has 267 partners with clients in virtually every state as well as abroad and are a dominant middle market firm. He explained the firm specializes in performing audits for hospitals and medical groups and has over 38 years experience in the healthcare industry. Mr. Wiens stated it is critical for an organization such as ours to have a firm that specializes in healthcare audits.</p> <p>With regard to Partner rotation, Mr. Wiens stated the firm believes in this practice. He went on to state that by staying with Moss Adams the District has the benefit of continuity as well as a "fresh set of eyes".</p> <p>Mr. John Blakely provided a summary of his background and qualifications. He stated he has been in public accounting since 1992, including experience with a Big 4 firm and has specialized in healthcare audits for the bulk of his career.</p> <p>Ms. Mary Nguyen, Engagement Senior Manager, provided a summary of her background and qualifications. She stated she has been with Moss Adams her entire career and chose healthcare as her focus.</p> <p>Committee members asked Mr. Blakely a variety of questions related to risks an auditor might identify, the firm's peer review process, communication style with management and the Board, to name a few.</p> <p>Director Schallock emphasized that we are different from private entities in that the Audit Compliance & Ethics Committee makes a recommendation to the Board but the Board has final approval authority.</p>		

	Discussion	Action Recommendations/ Conclusions	Person(s) Responsible
	<p>Ms. Blakely stated he is confident in the team proposed that includes himself, Stacy Stelzriede and Mary Nguyen. He explained that Ms. Stelzriede has a Big 4 background and comes to us with a vast depth of knowledge and has worked with Ms. Nguyen throughout his career and is pleased to have her part of this team.</p> <p>The Moss Adams team left the room at 9:16 a.m. to allow committee members an opportunity to deliberate. Committee members stated they were impressed with Mr. Blakely and the team proposed and sensed a high level of integrity and intellect. Committee members were in favor of remaining with a middle tier firm and rotation of partners.</p> <p>It was moved by Mr. Leslie Schwartz to recommend the Board engage Moss Adams to perform the FY2016 Financial Statement Audit with a partner rotation and team comprised of John Blakey, Engagement Reviewer, Stacy Stelzriede, Concurring Reviewer and Mary Nguyen, Engagement Senior Manager. Mr. Cumming seconded the motion. The motion passed unanimously.</p> <p>The Moss Adams team returned to the meeting at 9:25 a.m.</p> <p>Chairperson Finnilla provided Moss Adams with the committee's recommendation and requested Mr. Blakey attend the Board meeting next week to answer any questions the Board might have.</p> <p>Mr. Wiens stated he has enjoyed and appreciated the opportunity to work with the Tri-City team over the past several years.</p> <p>The Moss Adams team exited the meeting at 9:30 a.m.</p>	<p>Recommendation to be sent to the Board of Directors to engage Moss Adams to perform the FY 2016 Financial Statement Audit with a partner rotation; item to be placed on Board Agenda.</p> <p>Mr. Blakely to attend February 25, 2016 Board of Directors meeting.</p>	<p>Ms. Donnellan</p>
<p>B) Review and discussion of non-clinical contracts</p>	<p>Ms. Bernard-Shaw reported at last month's meeting she introduced the process for review of the non-clinical contracts. At the committee's recommendation the grid was adjusted to include a column to reflect PHI required, PHI</p>		

	Discussion	Action Recommendations/ Conclusions	Person(s) Responsible
	<p>received, ACE committee review and Board review dates. Ms. Bernard Shaw stated all contracts with the exception of Academy of Healthcare Revenue, LLC and CareFusion Solutions, LLC were evaluated and found to be adequate and rated with a status of "1". She explained Academy of Healthcare Revenue was evaluated and rated with a status of "2" due to an OIG screening issue that was identified and corrected. CareFusion Solutions was evaluated and rated with a status of "2" due to IV tubing that was found to be discolored. The vendor was contacted and the problem rectified. It was suggested that the grid be further adjusted to include an "R" after the rating to reflect the issue identified has been resolved.</p> <p>Ms. Bernard-Shaw also commented on the state's recent findings to our contract process. She stated we received positive feedback from the state and were found to be in compliance with the contract review process for both clinical and non-clinical contracts. Ms. Bernard-Shaw stated she is confident we can continue managing our contracts to comply with regulatory standards.</p> <p>General Counsel Ms. Racicot commented on some changes that may be necessary to the Evaluation Summary. Ms. Bernard-Shaw explained the Evaluation Summary presented at last month's meeting was designed to expedite the process but will be modified after the first round of contract review to address legal counsel's concerns.</p> <p>It was moved by Director Schallock to recommend approval of the list of Non-Clinical contracts as presented. Ms. Kathryn Fitzwilliam seconded the motion. The motion passed unanimously.</p>	<p>Recommendation to be sent to the Board of Directors to approve the list of Non-Clinical Contracts as presented; grid will be updated to reflect when issues found are resolved; item to be placed on Board agenda and included in Board agenda packet.</p>	<p>Ms. Donnellan/Ms. Bernard-Shaw</p>

	Discussion	Action Recommendations/ Conclusions	Person(s) Responsible
<p>C) Policy and Procedure Grid</p>	<p>Ms. Cheryle Bernard-Shaw reviewed the Policy and Procedure Grid contained in today's meeting packet which is used by the Administrative Policy & Procedure Committee to track the policy approval progress. Ms. Bernard-Shaw clarified there are over 8,000 policies and this particular grid only includes compliance type policies that are reviewed by the Audit, Compliance & Ethics Committee. Ms. Bernard-Shaw also noted the Organizational Compliance Committee also reviews the policies to ensure we are consistent and comply with current regulations. It was noted that a number of policies have expired. Ms. Bernard-Shaw stated policies that have expired are in the process of being reviewed and going forward it is the intent to review policies prior to their expiration date. Director Schallock urged review for those policies as soon as possible that have been expired for an extended length of time. General Counsel Ms. Racicot stated the dates on the grid are not entirely accurate as many of the expired policies have gone through the approval process. Ms. Bernard-Shaw commented the grid is an illustration of the process followed. It was suggested going forward dates be inserted rather than an "X". Ms. Racicot stated there are several more complex policies that involve physician arrangements that should go to Legal Counsel before going to the Medical Executive Committee or other committees for review. Ms. Bernard-Shaw concurred.</p>	<p>Ms. Bernard-Shaw to bring forward a revised Evaluation Summary when available.</p> <p>Information only.</p>	
<p>6. Old Business A) Review and discussion of Amendments to Administrative Policy & Procedure 1. 8610-545 – Education &</p>	<p>Ms. Cheryle Bernard-Shaw reported Policy 8610-545 – Education & Training – Introduction & General Policies was revised per the Committee's recommendation to reflect the volunteers will participate in compliance training.</p> <p>It was moved by Director Mitchell to recommend</p>	<p>Recommendation to be</p>	<p>Ms. Donnellan</p>

	Discussion	Action Recommendations/ Conclusions	Person(s) Responsible
Training – Introduction & General Policies	approval of Policy 8610-545 – Education & Training – Introduction & General Policies as presented. Mr. Jack Cumming seconded the motion. The motion passed unanimously.	sent to the Board of Directors to approve Policy 8610-545 – Education & Training – Introduction & General Policies as presented; item to appear on Board agenda and included in agenda packet.	
7. Oral Announcement of Items to be Discussed during Closed Session (Government Code Section 54957.7)	Chairperson Finnilla made an oral announcement of the item listed on the agenda to be discussed during closed session which included approval of closed session minutes.		
8. Motion to go into closed session	It was moved by Director Schallock and seconded by Ms. Kathryn Fitzwilliam to go into closed session at 10:00 a.m. The motion passed unanimously.		
9. Open Session	The committee returned to open session at 10:00 a.m. with attendance as previously noted.		
10. Report from Chairperson on any action taken in Closed Session (Authority: Government Code, Section 54957.1)	Chairperson Finnilla reported no action was taken in closed session.		
11. Comments from Committee Members	There were no comments from members of the committee.	Information Only	
12. Date of Next Meeting	Chairperson Finnilla stated the Committee's next meeting will be held on March 17, 2016.	The committee's next meeting is scheduled for March 17, 2016.	
13. Adjournment	Chairperson Finnilla adjourned the meeting at 10:03 a.m.		



AUDIT AND COMPLIANCE COMMITTEE
April 21st, 2016

Administrative Policies & Procedures		
1. Review of Tri-City Medical Center Information by Board Members	8610-210	3 year review, practice change
2. Responding to Compliance Issues – Introduction; General Policies 8750-558	8750-558	DELETE
3. Responding to Compliance Issues – Introduction; Reports of Suspected Misconduct; Confidentiality	8750-559	3 year review, practice change

Administrative Policy Manual

ISSUE DATE: 01/13

SUBJECT: Review of Tri-City Medical Center
Information by Board Members

REVISION DATE:

POLICY NUMBER: 8610-210

Department Approval Date:	1/16
Administrative Policies & Procedures Committee Approval:	1/13 2/16
Audit, Compliance and Ethics Committee Approval:	
Professional Affairs Committee:	1/13
Board of Directors Approval:	1/13

A. **PURPOSE:**

1. To ensure confidential information, patient information and employee information is protected in accordance with Tri-City Healthcare District's (TCHD) legal and ethical responsibilities.

B. **POLICY:**

1. **All requests by a Board member must be approved and confirmed by the "C" suite.**
 - a. **Personnel Employment, health care records of patients and employees are not accessible or other information deemed confidential by legislative or regulatory requirements.**
2. TCHD employees may only provide hard copies of District documentation to TCHD Board Members on site in their Board designated office space.
3. A TCHD Security Officer will be present as requested by the TCHD employee providing the information.
4. TCHD employees may not allow Board members to make electronic, manual or photo copies of the information being reviewed or remove the documentation from the premises.
5. Any particular set of documents may only be reviewed for up to two (2) hours per session and a maximum of one (1) session per week
6. Patient information, confidential information and privileged information gleaned from these sessions will not be discussed with any individuals unless the individual has a right to know such information.



**Tri-City Medical Center
Oceanside, California**

**Administrative Policy Manual
Compliance**

DELETE – This policy has been incorporated into Policy 8750-559 Responding to Compliance Issues; Misconduct; Confidentiality.

ISSUE DATE: 05/12

SUBJECT: Responding to Compliance Issues; Introduction; General Policies

REVISION DATE(S):

POLICY NUMBER: 8750-558

Department Approval Date(s)	01/16
Administrative Policies and Procedures Approval Date(s):	01/16
Medical Executive Committee Approval Date(s):	02/16
Organizational Compliance Committee Approval Date(s):	03/16
Audit, and Compliance and Ethics Committee Approval Date(s):	
Board of Directors Approval Date(s):	05/12

A. PURPOSE:

1. ~~Policy 8750-558 establishes Tri-City Healthcare District's commitment to respond promptly and responsibly with respect to compliance issues that are identified by or brought to the attention of the District's Chief Compliance officer.~~

B. QUESTIONS RELATING TO RESPONDING TO COMPLIANCE ISSUES

1. ~~Any questions about the Responding to Compliance Issues Policies (8750-558 through 8750-562) or questions that are not specifically addressed in the Responding to Compliance Issues Policies should be directed to the Chief Compliance Officer~~

C. AUDIT/DOCUMENTATION:

1. ~~The District shall audit and document compliance with the Responding to Compliance Issue Policies (8750-558 through 8750-561). Such audit shall be conducted pursuant to the Monitoring Compliance/Auditing Policies (8750-551 through 8750-554) and a report shall be made to the Compliance Committee, as appropriate. Relevant documentation shall be maintained in District's Compliance Program files, consistent with District's document retention policies.~~

D.B. RELATED DOCUMENTS:

1. ~~Administrative Policy 8750-551 – Monitoring Compliance – Auditing & Reporting; Introduction; General Policies~~
2. ~~Administrative Policy 8750-552 – Monitoring Compliance – Auditing & Reporting – Annual Compliance Workplan~~
3. ~~Administrative Policy 8750-553 – Monitoring Compliance – Auditing & Reporting – Compliance Reviews and Audits~~
4. ~~Administrative Policy 8750-554 – Monitoring Compliance – Auditing & Reporting – Exit Interviews~~
5. ~~Administrative Policy 8750-559 – Responding to Compliance Issues; Introduction; Suspected Misconduct; Confidentiality~~
6. ~~Administrative Policy 8750-560 – Responding to Compliance Issues; Introduction; Reports of Suspected Misconduct; Non-Retaliation~~
7. ~~Administrative Policy 8750-561 – Responding to Compliance Issues; Reports of Suspected Misconduct Investigation~~



Administrative Policy Manual
Compliance

ISSUE DATE: 05/12

SUBJECT: Responding to Compliance
Issues; Introduction;
Suspected Misconduct;
Confidentiality

REVISION DATE(S):

POLICY NUMBER: 8750-559

Department Approval Date(s):	01/16
Administrative Policies and Procedures Approval Date(s):	01/16
Medical Executive Committee Approval Date(s):	02/16
Organizational Compliance Committee Approval Date(s):	03/16
Audit, and Compliance and Ethics Committee Approval Date(s):	
Board of Directors Approval Date(s):	05/12

A. PURPOSE

1. ~~Policy 8750-559 provides (1)~~ **To provide** a statement of Tri-City Healthcare District's (TCHD's) policy with respect to the confidentiality of reports of suspected misconduct and potential compliance irregularities. **To establish TCHD's commitment to respond promptly and responsibly with respect to compliance issues that are identified by or brought to the attention of TCHD's Chief Compliance Officer.**

B. QUESTIONS RELATING TO RESPONDING TO COMPLIANCE ISSUES:

1. ~~Any questions about the Responding to Compliance Issues Policies (8750-559 through 8750-562) or questions that are not specifically addressed in the Responding to Compliance Issues Policies should be directed to the Chief Compliance Officer.~~

C. RESPONSE TO REPORT:

1. Where an employee or contractor has made a good faith report of an activity or practice that the employee/contractor believes violates or may violate applicable laws and regulations, District's TCHD's Compliance Program Policies or its Code of Conduct, the Chief Compliance Officer shall:
 - a. Appropriately commend the reporting employee/contractor for making the report and document that commendation in the employee's personnel file.
 - b. Strive to keep the identity of the reporting employee /contractor confidential **until such time as that is no longer possible to avoid impeding an investigation.**
 - c. Inform the reporting employee/contractor (if known) that there may come a point in time where his or her identity may become known or may have to be revealed (e.g., if government authorities become involved in the investigation).
 - d. Ensure that no retaliation or retribution action is taken against the reporting employee/contractor by virtue of making the report.

D. AUDIT/DOCUMENTATION:

1. ~~The District TCHD shall audit and document compliance issues with the per Responding to Compliance Department processes. Issues Policies (8750-558 through 8750-562). Such audit~~ **Auditing** shall be conducted ~~done~~ pursuant to the ~~Monitoring Compliance Department processes/Auditing Policies (8750-551 through 8750-554)~~ and a report shall be made to the **Organizational Compliance Committee**, as appropriate. Relevant documentation shall be

maintained in District's TCHD's Compliance Program files, consistent with District's TCHD's document retention policies.

E. **RELATED DOCUMENTS:**

1. **Administrative Policy 8750-551 – Monitoring Compliance – Auditing & Reporting; Introduction; General Policies**
2. **Administrative Policy 8750-552 – Monitoring Compliance – Auditing & Reporting; Annual Compliance Workplan**
3. **Administrative Policy 8750-553 - Monitoring Compliance – Auditing & Reporting; Compliance Review & Audits**
4. **Administrative Policy 8750-554 – Monitoring Compliance – Auditing & Reporting; Exit Interviews**
- ~~5. **Administrative Policy 8750-558 – Responding to Compliance Issues; Introduction; General Policies**~~
- 6.5. **Administrative Policy 8750-559 – Responding to Compliance Issues; Introduction; Reports of Suspected Misconduct, Confidentiality**
- 7.6. **Administrative Policy 8750-560 – Responding to Compliance Issues; Reports of Suspected Misconduct Non-Retaliation**
- 8.7. **Administrative Policy 8750-561 – Responding to Compliance Issues; Reports of Suspected Misconduct; Investigation**
- 9.8. **Administrative Policy 8750-562 – Responding to Compliance Issues; Remedial Action**

TRI-CITY HEALTHCARE DISTRICT
NON-CLINICAL CONTRACT EVALUATIONS E thru Q

- 1. No issues; 2. Minor issues/resolvable
- 3. Intermediate issues/resolvable; 4. Major issues/resolvable
- 5. Major issues/unresolvable/terminate

Vendor Name	Contract Number	Contract Type	Responsible Party, Primary	Responsible Department	Expiration Date	Reviewed/Completed	PHI REQ	PHI RCD	Status: 1-5	ACE Review	Board Review
Elsevier, Inc	1007.602C	License Agreement	Liston, Monique	Education	11/14/2016	12/4/15	N	N	1		
Elsevier, Inc	1007.2597C	Subscription Agreement	Liston, Monique	Library Services	10/31/2016	12/4/15	N	N	1		
Fallbrook Healthcare District	1007.2964C	License Agreement	Bennett, David	Business Development	06/27/2018	12/2/15	Y	Y	1		
First Class Vending	1007.813C	Services Agreement	Moore, Thomas	Cafeteria	12/31/2015	12/4/15	N	N	1		
Garda CL West, Inc	1021.1604C	Services Agreement	Dietlin, Steve	Administration	06/01/2016	12/2/15	N	N	1		
GE Healthcare	1007.236C	Equipment: Support and Service Agreement	Young, Steve	Imaging Svcs Admin	07/31/2016	12/3/15	Y	Y	1		
GE Healthcare	1007.2865C	Equipment: Support and Service Agreement	Young, Steve	Cardiac Cath Lab	09/30/2017	12/3/15	Y	Y	1		
GE Healthcare	1007.848C	Equipment: Support and Service Agreement	Young, Steve	Imaging Svcs Admin	07/31/2016	12/3/15	Y	Y	1		
GE Healthcare	1007.849C	Equipment: Support and Service Agreement	Young, Steve	Radiology	08/19/2016	12/3/15	Y	Y	1		
GE Healthcare	1007.3188C	Services Agreement	Young, Steve	Radiology	09/30/2017	12/3/15	Y	Y	1		
Geonetric, Inc	1007.636C	Services Agreement	Johnson, Jamie	Public Affairs - Marketing	06/04/2016	12/4/15	N	N	3		
Gordon & Rees LLP	1007.2600C	Professional Service Agreement	Bernard-Shaw, C	Legal and Compliance	Evergreen	12/3/15	N	N	1		
Gordon & Rees LLP	1007.3046C	Representation Letter	Bernard-Shaw, C	Legal and Compliance	03/17/2017	12/3/15	N	N	1		
Healing HealthCare Systems, Inc.	1007.3035C	License Agreement	Topp, Kathy	Education	09/30/2016	12/4/15	N	N	1		
Healthcare Appraisers, Inc.	1007.3291C	Professional Service Agreement	Conley, Kapua	Administration	07/21/2017	12/4/15	N	N	1		
Healthcare Revenue Management Group	1007.3078C	Services Agreement	Penix, Joni	Finance	Evergreen	12/4/15	Y	Y	1		
HealthcareSource HR, Inc.,	1007.1168C	License Agreement	Liston, Monique	Education	03/31/2016	12/3/15	N	N	1		
HealthStream, Inc	1007.2212C	License Agreement	Topp, Kathy	Education	04/01/2017	12/16/15	Y	Y	1		
HealthStream, Inc	1007.3348C	Services Agreement	Schultz, Sharon	Administration	09/30/2018	12/3/15	Y	Y	1		
HireRight, Inc.	1007.2194C	Services Agreement	Beverly, Esther	Human Resources	12/31/2015	12/2/15	N	N	1		
Hirschenhofer, Nadine	1007.2966C	Independent Contractor Agreement	Thompson, Colleen	Medical Records	10/31/2016	12/16/15	Y	Y	1		
Hooper, Lundy & Bookman, Inc	1007.1745C	Representation Letter	Bernard-Shaw, C	Legal and Compliance	07/01/2016	12/3/15	N	N	1		
Howmedica Osteonics Corp.	1007.2990C	Equipment: Purchase Agreement	Diamond, Mary	Surgery	01/05/2017	12/2/15	N	N	1		
HR Consulting Group, Inc	1007.1751C	Consulting Agreement	Beverly, Esther	Human Resources	04/03/2016	12/4/15	N	N	1		
HydroWorx International, Inc.	1007.2682C	Maintenance Agreement	Joshi, Priya	Physical Therapy	12/07/2016	12/4/15	N	N	1		
iCIMS, Inc.	1007.2443C	Subscription Agreement	Beverly, Esther	Human Resources	06/05/2016	12/2/15	N	N	1		
Ingram & Associates, LLC	1021.1761C	Consulting Agreement	Dietlin, Steve	Finance	05/23/2016	12/16/15	Y	Y	1		
Insight Investments, LLC	1007.936C	Equipment: Rental Agreement	Dietlin, Steve	Finance	08/31/2016	12/2/15	N	N	1		
Interactiva Health Networks	1007.2899C	Subscription Agreement	Myers, Nancy	NICU	07/31/2016	12/2/15	N	N	1		
Intuitive Surgical, Inc	1021.1771C	Software License and Service Agreement	Martinez, Daniel	Information Systems	06/26/2016	12/16/15	N	N	1		
Investors Property Management Group, Inc.	1007.2839C	Management Agreement	Knight, Wayne	Building Engineering	12/24/2015	12/16/15	N	N	1		
Iron Mountain	1007.2512C	Services Agreement	Thompson, Colleen	Medical Records	06/30/2017	12/4/15	Y	Y	1		

TRI-CITY HEALTHCARE DISTRICT
NON-CLINICAL CONTRACT EVALUATIONS E thru Q

- 1. No issues; 2. Minor issues/resolvable
- 3. Intermediate issues/resolvable; 4. Major issues/resolvable
- 5. Major issues/unresolvable/terminate

Contract ID	Contract Description	Contract Type	Contract Value	Contract Start Date	Contract End Date	Contract Status	Contract Category	Contract Manager	Contract Review Date	Contract Review Status	Contract Reviewer
1021.2126C	JA Russo Associates	Utility Service Agreement	1021.2126C	02/10/2016	12/31/15	N	Information Systems	Martinez, Daniel	12/31/15	N	1
1022.2150C	Karl Storz Endoscopy-America, Inc	Services Agreement	1022.2150C	04/08/2016	12/31/15	N	Surgery	Diamond, Mary	12/31/15	N	1
1007.1609C	Key Healthcare Consulting, LLC	Consulting Agreement	1007.1609C	03/15/2017	12/31/15	Y	Patient Accounting	Dietlin, Steve	12/31/15	Y	1
1007.2584C	Kingsbridge Healthcare Finance	Equipment: Lease	1007.2584C	04/01/2017	12/31/15	N	Finance	Hainsworth, Bart	12/31/15	N	1
1007.1500C	Kingsbridge Healthcare Finance	Equipment: Lease	1007.1500C	12/15/2015	12/16/15	Y	Information Systems	Martinez, Daniel	12/16/15	Y	1
1007.3034C	Kirby Noonan Lance & Hoge LLP	Representation Letter	1007.3034C	Evergreen	12/31/15	N	Legal and Compliance	Bernard-Shaw, C	12/31/15	N	1
1007.2218C	Landgraphics Enterprises, Inc.	Professional Service Agreement	1007.2218C	01/01/2017	12/31/15	N	Environmental Svcs	Miechowski, Chr	12/31/15	N	3
1007.3339C	Landreth Construction, Inc. a California corporation	Professional Service Agreement	1007.3339C	09/20/2016	12/31/15	N	Business Development	Knight, Wayne	12/31/15	N	1
1007.502C	Latte By The Sea	Services Agreement	1007.502C	01/12/2017	12/31/15	N	Facilities Development	Miechowski, Chr	12/31/15	N	1
1007.2011C	LAZ Parking California, LLC	Services Agreement	1007.2011C	08/31/2016	12/31/15	N	Business Development	Miechowski, Chr	12/31/15	N	1
1007.3208C	Leasing Associates of Barrington, Inc.	Equipment: Rental Agreement	1007.3208C	12/18/2019	12/16/15	N	Pharmacy	Szentesi, Charles	12/16/15	N	1
1021.444C	Les Mills West Coast Inc	Services Agreement	1021.444C	01/25/2016	12/21/15	N	Supply Chain Mgmt	Bennett, David	12/21/15	N	1
1007.2614C	Lexis Nexis	Subscription Agreement	1007.2614C	06/30/2016	12/31/15	N	Legal and Compliance	Bernard-Shaw, C	12/31/15	N	1
1021.1828C	Lifecare Solutions	Services Agreement	1021.1828C	04/30/2016	12/16/15	N	Managed Care	Knight, Wayne	12/16/15	N	1
1007.2412C	LinkedIn Corporation	Subscription Agreement	1007.2412C	05/06/2016	12/21/15	N	Human Resources	Beverly, Esther	12/21/15	N	1
1007.189C	Mallackrodt, Inc	Radiology Services Agreement	1007.189C	04/02/2018	12/31/15	Y	Radiology	Young, Steve	12/31/15	Y	1
1007.3134C	Managed Resources Inc.	Services Agreement	1007.3134C	03/14/2016	12/21/15	Y	Finance	Penix, Joni	12/21/15	Y	1
1007.2422C	Management Health Solutions, Inc.	Services Agreement	1007.2422C	03/30/2016	12/31/15	N	Supply Chain Mgmt	Moore, Thomas	12/31/15	N	1
1007.2615C	Mascari Warner Architects	Professional Service Agreement	1007.2615C	12/31/2017	12/31/15	N	Building Engineering	Miechowski, Chr	12/31/15	N	3
1007.2789C	Masimo Americas, Inc.	Equipment: Support and Service Agreement	1007.2789C	04/30/2016	12/31/15	N	Supply Chain Mgmt	Moore, Thomas	12/31/15	N	1
1007.220C	Matheson Tri-Gas, Inc	Equipment: Purchase Agreement	1007.220C	02/07/2017	12/16/15	N	Supply Chain Mgmt	Moore, Thomas	12/16/15	N	1
1007.2897C	Maxim Healthcare Services, Inc.	Professional Service Agreement	1007.2897C	12/31/2015	12/21/15	N	Human Resources	Hall, Christel	12/21/15	N	1
1007.3247C	Mazor Robotics Inc.	Maintenance Agreement	1007.3247C	02/28/2016	12/16/15	Y	Surgery	Diamond, Mary	12/16/15	Y	1
1021.3249C	Mazor Robotics Inc.	Services Agreement	1021.3249C	02/28/2016	12/16/15	Y	Surgery	Diamond, Mary	12/16/15	Y	1
1021.3250C	Mazor Robotics Inc.	Services Agreement	1021.3250C	02/28/2016	12/17/15	Y	Surgery	Diamond, Mary	12/17/15	Y	1
1021.3251C	Mazor Robotics Inc.	Services Agreement	1021.3251C	02/28/2016	12/18/15	Y	Surgery	Diamond, Mary	12/18/15	Y	1
1021.3252C	Mazor Robotics Inc.	Services Agreement	1021.3252C	02/28/2016	12/19/15	Y	Surgery	Diamond, Mary	12/19/15	Y	1
1021.3314C	McCarthy Building Companies	Professional Service Agreement	1021.3314C	01/12/2016	12/31/15	N	Business Development	Knight, Wayne	12/31/15	N	1
1021.1532C	McKesson Health Solutions, LLC	Data Use Agreement	1021.1532C	02/17/2016	12/10/15	Y	Information Systems	Martinez, Daniel	12/10/15	Y	1
1021.1542C	McKesson Health Solutions, LLC	Services Agreement	1021.1542C	04/10/2016	12/10/15	Y	Case Management	Livingstone, Scott	12/10/15	Y	1
1007.250C	McKesson Information Solutions LLC	Services Agreement	1007.250C	01/26/2016	12/16/15	Y	Radiology	Young, Steve	12/16/15	Y	1
1007.224C	Mead Johnson & Company, LLC	Equipment: Purchase Agreement	1007.224C	12/31/2015	12/21/15	N	Surgery	Diamond, Mary	12/21/15	N	1
1007.1623C	MedAssets Net Revenue Systems, LLC	License Agreement	1007.1623C	04/30/2017	12/21/15	Y	Administration	Penix, Joni	12/21/15	Y	1
1007.240C	MedAssets Supply Chain Systems, LLC	License Agreement	1007.240C	06/16/2018	12/16/15	Y	Finance	Penix, Joni	12/16/15	Y	1

TRI-CITY HEALTHCARE DISTRICT
NON-CLINICAL CONTRACT EVALUATIONS E thru Q

- 1. No issues; 2. Minor issues/resolvable
- 3. Intermediate issues/resolvable; 4. Major issues/resolvable
- 5. Major issues/unresolvable/terminate

Contract ID	Contract Description	Contract Number	Agreement Type	Contract Manager	Start Date	End Date	Renewal	Termination	Notes
1021.225C	MedAssets Supply Chain Systems, LLC	1007.2641C	Participation Agreement	Moore, Thomas	09/30/2016	12/4/15	N	N	1
1007.1867C	Medical Consultants Network, Inc. dba MCN Healthcare	1007.1879C	Services Agreement	Topp, Kathy	11/13/2018	12/16/15	N	N	1
1007.2725C	Medical Data Exchange	1007.2325C	Software License and Service Agreement	Dietlin, Steve	05/30/2016	12/3/15	Y	Y	1
1007.3209C	Medifax-EDI LLC	1007.2539C	License Agreement	Penix, Joni	03/25/2016	12/2/15	Y	Y	1
1007.2325C	Mediserve Information Systems, Inc.	1007.3156C	Software License and Service Agreement	Martinez, Daniel	04/30/2016	12/4/15	Y	Y	1
1007.2315C	Mediware Information Systems, Inc.	1021.1897C	Services Agreement	Martinez, Daniel	01/01/2016	12/4/15	Y	Y	1
1007.3209C	Medkeeper Inc.	1007.2890C	License Agreement	Hong, Tori	04/29/2017	12/16/15	Y	Y	1
1007.2539C	Medtronic, Inc	1007.3157C	Services Agreement	Diamond, Mary	12/1/2018	12/8/15	N	N	1
1021.1897C	M-Files Corporation	1007.3064C	Software License and Service Agreement	Bernard-Shaw, C	05/31/2016	12/16/15	N	N	1
1007.3156C	Microsoft Licensing G.P.	1007.3132C	Purchase (One-Time)	Martinez, Daniel	07/21/2017	12/16/15	N	N	1
1021.1897C	MICRUS Endovascular Corporation	1007.3204C	Consignment Agreement	Young, Steve	12/14/2015	12/3/15	N	N	1
1007.2890C	Midcap Funding RE Holdings, LLC (aka Midcap Financial, LLC)	1007.1899C	Financing Agreement	Dietlin, Steve	07/29/2038	12/4/15	N	N	1
1007.3157C	Midwest Television	1007.3066C	Professional Service Agreement	Bennett, David	06/30/2016	12/2/15	Y	Y	1
1007.1899C	Milliman, Inc	1007.3132C	Services Agreement	Carty, Charlene	12/31/2015	12/4/15	N	N	1
1007.3064C	M-Modal Services, Ltd.	1007.3204C	License Agreement	Young, Steve	04/30/2018	12/16/15	Y	Y	1
1007.3132C	M-Modal Services, Ltd.	1007.3204C	Services Agreement	Thompson, Colleen	08/10/2017	12/4/15	Y	Y	1
1007.3204C	Money Accumulation Pension Plan for Employees of TCHD (MAPP)	1021.1614C	Services Agreement	Abler, Quinn	01/01/2017	12/2/15	N	N	1
1021.1614C	National Access, Inc	1007.3230C	Services Agreement	Penix, Joni	03/25/2016	12/2/15	Y	Y	1
1007.3230C	National Electric Works	1007.639C	Services Agreement	Miechowski, Chris	01/06/2016	12/4/15	N	N	1
1007.639C	NAVEX Global	1007.2155C	Services Agreement	Cavanaugh, Marc	Evergreen	12/4/15	Y	Y	1
1007.2155C	NBC Digital Health Network, Inc	1007.3066C	Services Agreement	Diamond, Mary	02/08/2017	12/8/15	N	N	1
1007.3066C	Nestle Healthcare Nutrition, Inc.	1007.2252C	Supplies Agreement	Moore, Thomas	04/30/2017	12/4/15	N	N	1
1007.2252C	Net Health Systems, Inc.	1021.1555C	Software License and Service Agreement	Schultz, Sharon	01/20/2017	12/4/15	Y	Y	1
1021.1555C	NetPro Computing, Inc	1007.2369C	Software License and Service Agreement	Martinez, Daniel	06/15/2016	12/4/15	N	N	1
1007.2369C	Niddrie, Fish & Addams, LLP	1021.1174C	Representation Letter	Bernard-Shaw, C	Evergreen	12/3/15	Y	Y	1
1021.1174C	Nortel Networks	1007.3287C	Information Services Agreement	Martinez, Daniel	02/13/2032	12/4/15	N	N	1
1007.3287C	North County Internal Medicine	1007.2667C	Services Agreement	Bennett, David	07/15/2016	12/2/15	N	N	1
1007.2667C	Nova Biomedical	1007.3105C	Supplies Agreement	Szentesi, Charles	12/02/2017	12/4/15	N	N	1
1007.3105C	Novation, LLC	1007.1801C	Services Agreement	Hong, Tori	07/31/2016	12/16/15	N	N	1
1007.1801C	Oceanside Community Service Television Corp	1007.2697C	Services Agreement	Bennett, David	01/31/2017	12/3/15	N	N	1
1007.2697C	Ogletree Deakins	1007.2991C	Professional Service Agreement	Bernard-Shaw, C	02/10/2016	12/3/15	Y	Y	1
1007.2991C	On Assignment Staffing Services, Inc.		Professional Service Agreement	Thompson, Colleen	01/06/2016	12/4/15	Y	Y	1

TRI-CITY HEALTHCARE DISTRICT
NON-CLINICAL CONTRACT EVALUATIONS E thru Q

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- 5. Major issues/unresolvable/terminate

Contract ID	Contract Description	Contract Type	Contract Value	Contract Start Date	Contract End Date	Contract Status	Contract Category	Contract Manager	Contract Review Date	Contract Review Status	Contract Reviewer
1007.2840C	Ontario Refrigeration Service, Inc.	Services Agreement		03/31/2016	12/31/2016	N	Facilities Development	Miechowski, Chris	12/31/15	N	1
1007.2558C	Opus-ISM, LLC	Subscription Agreement		12/31/2015	12/31/2015	Y	Pharmacy	Hong, Tori	12/31/15	Y	1
1007.3280C	Oracle America, Inc.	Purchase (One-Time)		06/16/2016	12/16/15	N	Food and Nutrition	Moore, Thomas	12/16/15	N	1
1007.3174C	Origin, Incorporated dba ShiftWise	Software License and Service Agreement		10/14/2017	12/31/15	N	Education	Topp, Kathy	12/31/15	N	
1007.471C	Orkin Pest Control	Services Agreement		12/28/2015	12/4/15	N	Building Engineering	Miechowski, Chris	12/4/15	N	1
1007.1209C	Osborne Engineering, Inc	Consulting Agreement		08/10/2016	12/10/15	N	Administration	Schultz, Sharon	12/10/15	N	1
1007.3263C	Pacific Cancer Fitness	Services Agreement		04/14/2016	12/4/15	Y	Wellness Center	Johnson, Jamie	12/4/15	Y	1
1007.1615C	Passport Health Communications, Inc	License Agreement		11/06/2016	12/4/15	Y	Finance	Martinez, Daniel	12/4/15	Y	1
1007.2931C	Penumbra, Inc.	Consignment Agreement		08/22/2016	12/3/15	N	Supply Chain Mgmt	Young, Steve	12/3/15	N	1
1007.3290C	Pharmaceutical Strategies	Professional Service Agreement		07/15/2016	12/4/15	N	Human Resources	Abler, Quinn	12/4/15	N	1
1007.2980C	Philips Medical Capital LLC	Equipment: Lease		12/09/2016	12/3/15	Y	Radiology	Young, Steve	12/3/15	Y	1
1007.2884C	Press Ganey Associates, Inc	Services Agreement		07/22/2016	12/4/15	Y	Operational Improvement	Schultz, Sharon	12/4/15	Y	1
1007.1310C	Procopio, Cory, Hargreaves & Savitch Llp	Professional Service Agreement		Evergreen	12/4/15	Y	Legal and Compliance	Moran, Tim	12/4/15	Y	1
1007.2423C	Professional Hospital Supply, Inc.	Equipment: Purchase Agreement		04/15/2017	12/4/15	N	Supply Chain Mgmt	Moore, Thomas	12/4/15	N	1
1006.473C	Professional Maintenance Systems, Inc	Professional Service Agreement		06/30/2016	12/2/15	N	Building Engineering	Bennett, David	12/2/15	N	1
1007.919C	Protection1 Security Solutions	Equipment: Support and Service Agreement		08/03/2016	12/17/15	N	Behavioral Health Unit	Jayyousi, Sarah	12/17/15	N	1
1007.2161C	Pure Water Technology of San Diego	Equipment: Rental Agreement		08/04/2016	12/4/15	N	Supply Chain Mgmt	Moore, Thomas	12/4/15	N	1
1007.1328C	Pyxis Corporation	Services Agreement		03/30/2017	12/4/15	Y	Supply Chain Mgmt	Moore, Thomas	12/4/15	Y	1
1021.2440C	Quadrant Affinity Corporation	Software License and Service Agreement		12/31/2017	12/2/15	Y	Finance	Dietlin, Steve	12/2/15	Y	1
1007.943C	Quantros, Inc	Software License and Service Agreement		06/30/2016	12/16/15	Y	Operational Improvement	Martinez, Daniel	12/16/15	Y	1
1007.3183C	Quantros, Inc	Subscription Agreement		06/30/2016	12/4/15	Y	Information Systems	Martinez, Daniel	12/4/15	Y	1

Policies and Procedures that go to Audit, Compliance and Ethics Committee

APPROVAL PROCESS

Number	Title	Current Step	APP	MEC	OCC	ACE	BOD	EXP.
	200's DISTRICT OPERATIONS							
209	Board Access to TCHD Information	ACE 4/2016	1/21/2016	N/A	N/A		1/2013	1.2016
262	Ethics in Provision of Services		9/17/2015	N/A	N/A	10/15/2015	10/29/2015	10.2018
278	Contract Review		12/17/2015	N/A	N/A	1/21/2016	1/28/2016	1.2018
279	File Maintenance for Contracts and Leases		05/2009	N/A	N/A	N/A	6/1/2009	6.2012
294	Legal Documents		9/17/2015	N/A	N/A	10/15/2015	10/29/2015	10.2018
	500's COMPLIANCE							
502	Employee Response to Government Investigation - (Cheryle to make changes and bring back to ACE Dec. 2015)	Pulled at ACE 11/15	10/15/2015	N/A		PULLED	9/29/2011	9.2014
510	Disposal of Individually Identifiable Information		5/21/2015	N/A		6/18/2015	6/25/2015	6.2018
511	HIPAA Business Associate		5/21/2015	N/A		6/18/2015	6/25/2015	6.2018
513	Disclosure of Protected Health Information		09/2010	N/A		11/2010	12/16/2010	12.2013
514	Privacy – Designated Record		5/21/2015	N/A		6/18/2015	6/25/2015	6.2018
515	Use and Disclosure of Protected Health Information - Records - uploaded to MCN and assigned approval template but never approved; last BOD approval 01/2009		11/2008	N/A		N/A	01/2009	1.2012
516	Patient Access to Protected Health Information – Patient Record - reactivated 10/14; last BOD approval 01/2009		11/19/2015	N/A		1/21/2016	1/28/2016	1.2019
518	Notice of Privacy Practice		5/21/2015	N/A		6/18/2015	6/25/2015	6.2018
519	Alternate Means of Communicating (PHI) Protected Health Information		9/17/2015	N/A		10/15/2015	10/29/2015	10.2018
520	Amendment to Protected Health Information - reactivated 10/2014; last BOD approval 02/2009		5/21/2015	N/A		6/18/2015	6/25/2015	6.2018
524	Disclosure of Information to Public and Media		6/18/2015	N/A		8/20/2015	8/27/2015	8.2018
525	Use of PHI for Fundraising - reactivated 11/14; last BOD approval 04/2009		6/18/2015	N/A		1/21/2016	1/28/2016	1.2019
526	Right to Request Privacy Protection of Protected Health Information - reactivated 11/14; last BOD approval 03/2009		3/19/2015	N/A		4/16/2015	4/30/2015	4.2018
527	Facility Directory & Visiting Guidelines for Clergy		10/15/2015	N/A		11/19/2015	12/10/2015	12.2018
528	Accounting for Disclosure of PHI - reactivated 10/2014; last BOD approval 02/2009		5/21/2015	N/A		6/18/2015	6/25/2015	6.2018
531	Sanctions, to Comply with Privacy & Security Policies & Procedures		6/18/2015	N/A		9/22/2015	12/10/2015	12.2018
532	Compliance Program Generally; Introduction		10/15/2015	N/A		11/19/2015	12/10/2015	12.2018
535	Chief Compliance Officer: Introduction; General Policies		3/19/2015	N/A		4/16/2015	4/30/2015	4.2018
537	Hiring and Employment; Definitions	AP&P 5/16		N/A			12/13/2012	5.2015

Number	Title	Current Step	APP	MEC	OCC	ACE	BOD	EXP.
538	Hiring and Employment; Screening Prospective Employees/Covered Contractors	AP&P 5/16	10/15/2015	N/A		11/19/2015	12/10/2015	12.2018
539	Hiring and Employment; Screening Current Employees/Covered Contractors	AP&P 5/16		N/A		X	5/31/2012	5.2015
540	Hiring and Employment; Pending Charges against Current Employees/Covered Contractors	AP&P 5/16		N/A		X	5/31/2012	5.2015
541	Hiring and Employment; Conviction/Exclusion/License Revocation of Current Employees/Covered Contractors	AP&P 5/16		N/A		X	5/31/2012	5.2015
542	Hiring and Employment; Employee/Covered Contractor Requirement to Report Changes in Certification	AP&P 5/16		N/A		X	5/31/2012	5.2015
543	Hiring and Employment; Employee Performance Evaluations	AP&P 5/16		N/A		X	5/31/2012	5.2015
544	Hiring and Employment; Duty to Report Suspected Misconduct/Potential Compliance Irregularity		10/15/2015	N/A		11/19/2015	12/10/2015	12.2018
545	Education & Training-Introduction & General Policies		10/15/2015	N/A		2/18/2016	2/25/2016	2.2019
546	Education & Training-Distribution-Certification of Code of Conduct and Policies	Pulled from APP 10/15		N/A		X	5/31/2012	12.2015
547	Education & Training-General Annual Compliance Training Program		10/15/2015	N/A		X	12/10/2015	12.2018
548	Education & Training-Specific Training Programs	AP&P 5/16	11/19/2015	N/A		1/21/2016	1/28/2016	1.2019
549	Education & Training-As Needed Education and Training			N/A		X	5/31/2012	12.2015
550	Education & Training-Compliance Notices-Updates		11/19/2015	N/A		1/21/2016	1/28/2016	1.2019
551	Monitoring Compliance-Auditing & Reporting; Introduction; General Policies		11/19/2015	N/A		1/21/2016	1/28/2016	1.2019
552	Monitoring Compliance-Auditing & Reporting; Annual Compliance workplan						5/31/2012	12.2016
553	Monitoring Compliance-Auditing & Reporting; Compliance Review & Audits						5/31/2012	5.2015
554	Monitoring Compliance-Auditing & Reporting; Exit Interviews	Pulled OCC 03/16	1/21/2016	2/22/2016			5/31/2012	5.2015
555	Communicating & Reporting Compliance Concerns; In General		5/21/2015	N/A		6/18/2015	6/25/2015	6.2018
556	Communicating & Reporting Compliance Concerns; Reporting of Suspected Misconduct; Confidentiality		11/19/2015	N/A		1/21/2016	1/28/2016	1.2019
557	Communicating & Reporting Compliance Concerns; Confidential Reporting		5/21/2015	N/A		8/20/2015	8/27/2015	8.2018
558	Responding to Compliance Issues; Introduction; General Policies	ACE 4/2016	1/21/2016	2/22/2016			5/31/2012	5.2015
559	Responding to Compliance Issues; Introduction; Reports of Suspected Misconduct; Confidentiality	ACE 4/2016	1/21/2016	2/22/2016			5/31/2012	5.2015

Number	Title	Current Step	APP	MEC	OCC	ACE	BOD	EXP.
560	Responding to Compliance Issues; Reports of Suspected Misconduct; Non-Retaliation	Pulled Prior to OCC 3/16	1/21/2016	2/22/2016			12/13/2012	12.2015
561	Responding to Compliance Issues; Reports of Suspected Misconduct; Investigation	Pulled Prior to OCC 3/16	1/21/2016	2/22/2016			5/31/2012	5.2015
562	Responding to Compliance Issues; Remedial Action	Pulled Prior to OCC 3/16	1/21/2016	2/22/2016			12/13/2012	12.2015
563	Development & Revision of Code of Conduct & Policies; Introduction & General Policies	DELETE - Needs to move forward w/564	1/21/2016	2/22/2016			5/31/2012	5.2015
564	Development & Revision of Code of Conduct & Policies	Pulled Prior to OCC 3/16	1/21/2016	2/22/2016			5/31/2012	5.2015
565	Revision of Code of Conduct & Compliance Policies	DELETE - Needs to move forward w/564	1/21/2016	2/22/2016			5/31/2012	5.2015
566	Development & Revision of Code of Conduct & Policies; Referring Code of Conduct & or Policies	Pulled OCC 03/16	1/21/2016	2/22/2016	PULLED		5/31/2012	5.2015
567	Development & Revision of Code of Conduct & Policies; Dissemination of New or Revised Code of Conduct & Policies	DELETE - Needs to move forward w/564	1/21/2016	2/22/2016			5/31/2012	5.2015
568	Referral Source Policies; General Policy Regarding Arrangements with Physicians-Other Referral Sources	Pulled OCC 03/16	1/21/2016	2/22/2016	PULLED		5/31/2012	5.2015
569	Conflicts of Interest	AP&P 4/16					5/31/2012	5.2015
570	Loans & Guarantees to Physicians	AP&P 4/16					3/1/2013	3.2016
571	Medical Directorships	AP&P 4/16					2/28/2013	2.2016
572	Business Courtesies to Physicians and Immediate Family Members						2/1/2013	2.2016
573	Tracking Remuneration and Use of Items and Services to and from Referral Source and Tracking Use of Tri-City Health Care District Resources by Referral Sources						3/1/2013	3.2016
574	Sales of Items or Services to Physicians and Other Potential Referral Source						4/1/2013	4.2016
575	Controls & Monitoring of payments to physicians or referral sources						3/1/2013	3.2016
576	Physician Recruitment Agreements						5/1/2013	5.2016

Number	Title	Current Step	APP	MEC	OCC	ACE	BOD	EXP.
580	Physician and Allied Health Professional Service Contracts						4/1/2013	4.2016
581	Office Space and Equipment Leases with Physicians and other Potential Referral Sources						5/1/2013	5.2016
585	HIPAA Administration Requirements		5/1/2015	N/A		6/1/2015	6/25/2015	6.2018
586	HIPAA Breach Response						12/16/2013	12.2016
587	HIPAA Patient's Rights						12/16/2013	12.2016
589	PHI Uses and Disclosures for Marketing						12/16/2013	12.2016
590	PHI Uses and Disclosures						12/16/2013	12.2016
591	HIPAA Mitigation		6/2015	N/A		8/2015	8/27/2015	8.2018
592	Use and Disclosure of Protected Health Information (PHI) for Treatment, Payment and Health Care Operations (TPO)		6/1/2015	7/2015		7/2015	9.24.2015	9.2018
593	Verification of Identity and Authority of Persons Requesting Protected Health Information (PHI), including Personal Representatives		7/2015			8/2015	8/27/2015	8.2018