



HAWAII HEALTH SYSTEMS
C O R P O R A T I O N

"Touching Lives Every Day"

COMPLIANCE ALERT 12-17

HHSC Board Members Requirements for Completion of Critical Compliance Documents

EXECUTIVE SUMMARY: All HHSC Board members (Corporate and Regional) should review and complete as necessary the following documents:

- 1) Signed agreement for Physician board members that receive a compensation or payment (travel reimbursements, etc.) for their duties as board members
- 2) Ethics commission form (by anyone receiving a "gift" of more than \$200 annually from one outside source, one-time or in aggregate for HHSC related work.
- 3) Ethics commission financial disclosure form (long and short form for alternating years)
- 4) Code of Conduct
- 5) Conflict of Interest Form

DETAILED INFORMATION:

- 1) Please remember that all physician board members need a signed agreement in place to provide or reimburse them for anything of substance for their work on the board. For example, given all the EMR work, there may be times you want your BOD members to travel, go out for dinner as part of some committee work, etc. etc. To be safe, it is good to have the attached agreement (which is on the PFA SharePoint site) signed and in place. Even if your physician BOD member is employed, this form should be completed because we pay board members under a different process and policy than other employees.
- 2) Here are the questions that the Ethics Commission requires us to submit when we are requesting "approval" to accept a gift such as travel, lodging etc. I had to complete this recently for the five EMR Steering Committee members who are traveling to Colorado with Siemens paying the airfare. Once you complete, you submit to the Ethics Commission attorneys for review and they will respond with a letter. Then if the gift is over \$200, you have to complete a gift disclosure form (on their website). Obviously, not going to happen very often except perhaps for RCEOs, administrators, etc.

<http://hawaii.gov/ethics/forms/gd/GD1.pdf> Note --This is not the questionnaire but the actual gift disclosure form.

- 3) As a reminder, all Corporate and Regional Board members (regardless of how appointed) are required by law to comply with the State's annual financial disclosure filling process. There is an every-other-year long form and every-other-year short form required to be completed. 2012 is a "long form" year and consequently long form filings are due by all our Board members no later than May 31, 2012. A link to the two forms is provided below.

--Shortcut to long form (even years): <http://hawaii.gov/ethics/forms/findisc/D-201-LONG.pdf>

--Shortcut to short form (odd years) : <http://hawaii.gov/ethics/forms/findisc/D-103A-SHORT.pdf>

Please note that if a board member leaves office within nine months of their last disclosure, no additional form is required. If they leave outside of the 9-month period, another "closing" form must be provided to the Ethics Commission. For example, if a board member submits his annual form in January 2012, and leaves office in July 2012, no additional form needs to be completed. If he leaves in November 2012 (10+months later) he will have to file a final "closing" form.

- 4) Code of Conduct: Booklet has an acknowledgement form in the back of the booklet. This should be signed annually.

- 5) Conflict of Interest Form: At least annually, Board members should report any conflict of interests that may exist and sign the Conflict of Interest Form. An example of the one used for HHSC Board members is below:

<..\..\Conflict of Interest\CONFLICT OF INTEREST REPORTING FORM--HHSC BOD Members--2-12.doc>