

<b>Chapter:</b>	<b>General Management</b>		
<b>Title:</b>	<b>Board Member Disclosure of Ownership, Controlling Interest, and Criminal Convictions Statement</b>		
<b>Policy:</b> <input type="checkbox"/>	<b>Review Cycle:</b> Biennial	<b>Adopted Date:</b> 09.13.2022	<b>Related Policies:</b> New Board Member Orientation Conflict of Interest Policy
<b>Procedure:</b> <input checked="" type="checkbox"/>	<b>Author:</b> Executive Assistant	<b>Review Date:</b>	
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**Purpose**

Federal regulations require PIHPs to disclose information about Board Members with ownership or control interests in the PIHP. These regulations also require the PIHP to identify and report any additional ownership or control interests in other entities, as well as identify when any of the individuals with ownership or control interests have spousal, parent-child, or sibling relationships with each other. To ensure timely and accurate information is obtained from the MSHN Board of Directors (BOD) and Substance Use Disorder Oversight Policy Advisory Board (OPB) members. To ensure record retention is in accordance with MSHN policy.

**Procedure**

Initial Disclosure of Ownership, Controlling Interest, and Criminal Conviction Statement is included in the BOD and OPB New Member Orientation packet along with information regarding the disclosure requirement. BOD/OPB members must complete the form in its entirety, sign and date. Additional information may be provided on separate sheets, if necessary.

- The disclosure form is reviewed for completion, including signature and date by MSHNs Executive Assistant.
  - If a BOD/OPB member answers ‘yes’ to any question, additional information must be provided.
- The completed disclosure form is uploaded to the Board Member Information folder in Box by the MSHN Executive Assistant. NOTE: Access to this folder is limited to certain MSHN staff.
- Initial Board Disclosure form(s) are reviewed for disclosures and new BOD members are added to the VerifyComply System, as detailed below.
- The MSHN Executive Assistant adds the initial disclosure date to the disclosure tracking database.

Annually, BOD and OPB members must update the disclosure form:

- In May of each year, the MSHN Executive Assistant will send the BOD members a disclosure form via DocuSign for electronic completion. In June of each year, the MSHN Executive Assistant will send the OPB members the disclosure form via DocuSign.
- Upon BOD/OPB member completion of the form and signature, DocuSign sends notification to the MSHN Executive Assistant via email.
- MSHNs Executive Assistant will review the forms for disclosures and the updated disclosure date is added to the disclosure tracking database.

VerifyComply System:

- The VerifyComply system is utilized to complete a verification of the individuals listed against the Office of Inspector General’s (OIG) exclusions database to ensure the individual has not been excluded from participating in Medicare, Medicaid or any other Federal health care programs.
- New BOD members name, address, date of birth and social security number are provided to the MSHN Contract Manager to add to the master list contained in the VerifyComply secure online system. MSHNs Executive Assistant performs a single search on the new BOD member by adding their name into the VerifyComply system.
- Once a month the VerifyComply system performs a check on everyone listed on the MSHN database list in the VerifyComply system.
- If a BOD member appears on the VerifyComply exclusions list, MSHNs Chief Compliance and Quality Officer and Deputy Director review in accordance with the Disclosure and Disqualified Procedures. Based on the review, the Deputy Director will draft a recommendation to the Chief Executive Officer for board action.

Upon termination of BOD or OPB member term:

- MSHNs Executive Assistant is notified of a BOD or OPB member term end date.
- The respective BOD or OPB member is removed from the VerifyComply database list, and the disclosure tracking database is updated by the MSHN Executive Assistant.

**Applies to:**

- All Mid-State Health Network Staff
- Mid-State Health Network Board Members
- Selected MSHN Staff, as follows: Executive Assistant
- MSHN CMHSP Participants:  Policy Only     Policy and Procedure
- Other: Sub-contract Providers

**Definitions:**

BOD: Board of Directors

MSHN: Mid-State Health Network

OPB: Oversight Policy Advisory Board

**Other Related Materials:**

Disclosure of Ownership, Controlling Interest, and Criminal Conviction Form



PIHP Board of  
Directors Disclosure c

**References/Legal Authority:**

Code of Federal Regulations (42 CFR 455.100-106, 455 Subpart B)

**Change Log:**

<b>Date of Change</b>	<b>Description of Change</b>	<b>Responsible Party</b>
02/2022	New Procedure	Executive Assistant
06/2022	Biennial Review	Executive Assistant