

Frigo, Victoria (COE)

From: Frigo, Victoria (COE)
Sent: Tuesday, April 16, 2013 12:08 PM
To: 'Salinas, Diana'
Cc: Centorino, Joseph (COE)
Subject: RE: Consero's 2013 Corporate Compliance & Ethics Forum (INQ 13-96)

Hello Diana,

As long as you have the approval of your supervisor to be absent from your JMH job *and you pay for your own travel expenses*, you may attend a forum directly or indirectly subsidized by County vendors. Travel expenses include, but are not limited to, transportation, lodging, meals, registration fees, and incidentals. See Miami-Dade County Code at Sec. 2-11.1 (w).

If you have additional questions, please feel free to contact me.

Sincerely,

VICTORIA FRIGO, SENIOR STAFF ATTORNEY

Direct Phone: 305 350-0601
Main Number: 305 579-2594
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19 West Flagler St., Suite 820
Miami, FL 33130

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From: Salinas, Diana [mailto:DSalinas@jhsmiami.org]
Sent: Tuesday, April 16, 2013 11:46 AM
To: Frigo, Victoria (COE)
Cc: Centorino, Joseph (COE)
Subject: RE: Consero's 2013 Corporate Compliance & Ethics Forum (INQ 12-220)

Good morning Victoria,

I understand that due to the fact two of the companies that indirectly underwrite this Forum are current Jackson Health System (JHS) vendors I am prohibited from accepting the invitation from Consero includes travel, accommodations, registrations and food. However, I just learned that the Consero Compliance Forum was approved for a total of 13 general and 3.5 ethics CLE credits, based on a 50-minute CLE credit system by The Florida Bar CLE Board. From everything I've researched, it seems this forum will be a good educational experience where I will have the opportunity to expand my ability to assist JHS to ensure a robust compliance program as well as compliance with the increasing governmental regulatory scrutiny, and avoid fines and negative press that often accompany non-compliance, especially in the healthcare arena. My role as Chief Compliance Officer does not require that I be an attorney but it is strongly preferred and so I maintain my license active with the Florida Bar on my own. In addition to the educational and networking experience, this Forum will provide CLEs towards my licensure and my question to you now is the following: am I allowed to attend this Forum if I pay for the accommodations, registration, travel and meals myself. Please advise.

Thanks again,
Diana

Diana Salinas, Esq., CHC
Corporate Director and
Chief Compliance Officer
Jackson Health System
1500 NW 12th Ave., Suite 102
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Compliance Hotline - 1.800.684.6457

From: Salinas, Diana
Sent: Wednesday, December 12, 2012 5:40 PM
To: 'Frigo, Victoria (COE)'
Cc: Centorino, Joseph (COE)
Subject: RE: Consero's 2013 Corporate Compliance & Ethics Forum (INQ 12-220)

Once again thank you for the prompt response and guidance, this is very helpful.

Diana Salinas, Esq., CHC
Corporate Director and
Chief Compliance Officer
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Compliance Hotline - 1.800.684.6457

From: Frigo, Victoria (COE) [<mailto:FRIGOV@miamidade.gov>]
Sent: Wednesday, December 12, 2012 4:29 PM
To: Salinas, Diana
Cc: Centorino, Joseph (COE)
Subject: Consero's 2013 Corporate Compliance & Ethics Forum (INQ 12-220)

Hello Diana,

You've asked if you may accept travel-related expenses, including tuition reimbursement, accommodations, and meals, from Consero, a private entity organizing a Compliance Forum in San Diego.

The County Ethics Code at Sec. 2-11.1 (w) prohibits you from accepting travel expenses, *directly or indirectly*, from a JHS contractor, vendor, service provider, bidder or proposer. Travel expenses include, but are not limited to, transportation, lodging, meals, registration fees and incidentals.

Although Consero is not a JHS vendor, other sponsors of the event may be vendors. Until you know precisely the entities sponsoring the event in San Diego, you will not be able to determine if you can accept the travel expenses.

If no vendors are involved and you accept the registration fees, meals, and lodging from Consero, you must disclose the expenses as a gift. *See* the County Ethics Code at Sec. 2-11.1 (e)(4).

If JHS vendors are sponsoring the event, you may still attend, as long as the expenses are paid for by JHS.

Note that the PHT Board may waive the requirements of this subsection by a majority vote. Also, the prohibition does not apply to travel expenses paid by other governmental entities or by organizations of which the County or the PHT is a member as long as the travel is related to that membership.

If you have additional questions, please feel free to contact me.

Sincerely,

VICTORIA FRIGO, STAFF ATTORNEY

Phone: 305 350-0601

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From: Salinas, Diana [<mailto:DSalinas@jhs-miami.org>]
Sent: Monday, December 10, 2012 2:33 PM
To: Centorino, Joseph (COE)
Subject: Consero's 2013 Corporate Compliance & Ethics Forum

Joe,

Thanks for taking my call so promptly today, it was nice catching up.

I am following up with the information we discussed related to the 'Compliance Forum' I've been invited to and put on by Consero.

Below is my email exchange with them from last week. I've also included an attachment that may provide additional information.

You will read that the event is by invitation only and accommodation and meals are covered by Consero. I thought the airfare was also covered but just read were it is not - so airfare is not included and is additional.

The question I would like to pose is as follows:

- Is this an event I am permitted to attend?

Please advise.

Thanks again,
Diana

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From: Zach Overking [<mailto:zoverking@consero.com>]
Sent: Friday, December 07, 2012 11:34 AM
To: Salinas, Diana
Subject: Re: Consero's 2013 Corporate Compliance & Ethics Forum

Hi Diana,

In my prior email I listed who we had confirmed as solution providers:

The Network
SKOUT Group
Navex Global

I understand and can fully appreciate your concerns regarding conflicts of interest regarding JHS. One of the things that makes our format unique is that once an attendee is confirmed to our program (such as yourself) we ask that they provide solution providers that they would like to see at the event, and we try to bring them in.

The list of confirmed solution providers above came from referrals that our confirmed attendees provided. In addition, We try to get a total of ten solution providers for each event, and one month prior to the event, a full list of confirmed sponsors is circulated to our attendees. That said, if there is anyone who you would like us to avoid, or any best-in-class you would like to see, we would try to accommodate you.

So, although it's impossible to provide a full list at this time, I have provided who we have on currently. I hope this helps clear things up. Let me know what you think, I'm here to help in any way I can.

Best,

Zach

On Fri, Dec 7, 2012 at 11:04 AM, Salinas, Diana <DSalinas@jhsiami.org> wrote:

Zack, thank you so much for reaching out to me and following up with this information. It sounds like an interesting event and I am trying to clear it through the legal and executive leadership channels here at Jackson Health System (JHS). One of the things that has the potential to raise concern for me is the 'sponsors' associated with this event and I thought we discussed you would include a list of them so that I can review if they are current vendors at JHS – is that something you are able to provide me with prior to making the decision to accept?

I look forward to hearing back from you.

Thanks again,

Diana

Diana Salinas, Esq., CHC

Corporate Director and

Chief Compliance Officer

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From: Zach Overking [mailto:zoverking@consero.com]

Sent: Thursday, December 06, 2012 12:22 PM

To: Salinas, Diana

Subject: Consero's 2013 Corporate Compliance & Ethics Forum

Hi Diana,

It was a pleasure speaking with you today! I would welcome the opportunity to host you as a delegate or panel speaker at my Corporate Compliance & Ethics Forum on April 28-30, 2013, at Paradise Point Resort in San Diego, CA. I'm currently in the process of hand-picking delegates for my Forum, which is invitation-only, for 60 CCO's. I think it would be wonderful to have your thought leadership there, given your level of experience. I think that you'll find this format a great use of your limited time due to the quality of content and seniority of attendees. It's a great opportunity to benchmark best practices and network cross-industry with peers.

The program I'm organizing will be taking place over the course of 2 1/2 days (starting on a Sunday and ending on a Tuesday to minimize time away from the office), and the format is designed to be collaborative. There will be a variety of panel discussions, roundtable sessions, and advisory meetings, and every participant will have customized itinerary designed to meet individual and organizational goals. This is a hosted event, so your tuition, accommodations, meals, and networking functions are covered by us. It's not a selling point, but I do not want cost to be an issue. Your only expense is getting to and from the resort in San Diego, CA.

I've attached the Forum Guide so you can review some of the content we'll be covering at the event. If you think the forum would be valuable, I would like to schedule a brief call to confirm and go over our format, and I'll then send a short, one-page registration e-form that can be filled out in minutes and returned via email. Spots do tend to fill quickly on this forum due its popularity (especially panelists), so please feel free to reach out if there are any questions in the interim, I'm always happy to help.

Currently, our sponsors are as follows:

The Network

SKOUT Group

NAVEXGlobal

Warm regards,

Zach Overking

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Zachary Overking

Manager, Program Development

Consero Group LLC

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Watch the [Story of Consero](#).

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