



## **Compliance and Data Integrity Committee Charter**

### **Iowa Community HUB**

#### **1. Purpose**

The Compliance and Data Integrity Committee (the “Committee”) is established to ensure that the Iowa Community HUB operates in full compliance with applicable federal, state, and local regulations; adheres to ethical standards; and maintains the integrity, accuracy, security, and appropriate use of all data collected, shared, or exchanged through the HUB’s systems and partnerships.

The Committee provides guidance on policies, procedures, and practices that promote transparency, accountability, and trust among participants, clients, and partners. Working together, the HUB’s legal team, Compliance Officer, Director of Operations, and contracted Chief Information Security Officer (“Internal Compliance Team”) will guide the development of formal policies and procedures to uphold compliance with all relevant requirements. The Committee will review and provide feedback, recommendations, and guidance on these policies and procedures to help ensure they are practical, effective, and aligned with the HUB’s mission and operational needs.

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#### **2. Scope and Responsibilities**

##### **A. Compliance Oversight**

- Support the HUB’s compliance efforts by overseeing adherence through regular review of compliance reports and updates related to HIPAA, 42 CFR Part 2, FERPA, and applicable state privacy laws.
- Review and provide feedback on policies and procedures related to compliance, confidentiality, and information governance that are developed with the guidance of the Internal Compliance Team.
- Collaborate with the Internal Compliance Team to ensure that training and education programs related to compliance and ethical conduct are effective and appropriate for all stakeholders.
- Advise on compliance risks and recommend actions or considerations, while the Internal Compliance Team and staff leadership maintain responsibility for implementing and enforcing corrective action plans.
- Recognize that financial compliance, including budget oversight, billing, and fraud prevention, is the direct responsibility of HUB leadership, the Board of Directors,



and the contracted accounting firm. The committee may periodically review financial compliance summaries or audit reports prepared by these parties to identify potential risks, patterns of concern, or gaps in internal controls and provide recommendations as appropriate.

## **B. Contract Compliance**

- Ensure contractual obligations, legal regulations, and internal policies are met throughout the vendor/partner lifecycle.
- Review contracts to ensure compliance with applicable federal, state, and local regulations and HUB policies and procedures.
- Identify compliance risks or gaps and recommended corrective actions.
- Manage, track, and review contract deliverables, milestones, renewal or extension requirements.

## **C. Data Integrity and Quality**

- Provide oversight and guidance to ensure the HUB and its partners maintain high standards for the accuracy, timeliness, and completeness of data collected, reported, and exchanged.
- Collaborate with HUB data and IT staff to review and advise on data validation and quality assurance practices, ensuring consistent application across systems.
- As appropriate, review and provide recommendations on data requests received by the HUB from external partners, particularly when requests involve sensitive or high-impact data.
- Review summaries or findings from internal or external data quality audits and offer feedback or recommendations for improvement. Implementation of corrective actions will be led by Internal Compliance Team and staff leadership.

## **D. Privacy, Security, and Ethical Use**

- Receive updates and review summaries of incidents involving potential data breaches, unauthorized disclosures, or misuse of information. Provide feedback and recommendations, while the Internal Compliance Team lead investigation, mitigation, and reporting processes.
- Advise on ethical considerations related to data sharing, including consent management, secondary data use, and de-identification practices. The Committee will provide input and guidance to ensure these practices reflect community values, privacy standards, and regulatory requirements.



## **E. Reporting and Transparency**

- Review and endorse an annual summary of compliance and data integrity performance, prepared by HUB staff for the Board of Directors and the HUB Advisory Group, highlighting key risks, mitigation strategies, and achievements.
  - Advise on practices that promote transparency in data use agreements, partner accountability, and communication with stakeholders, while HUB staff maintain responsibility for implementation and dissemination.
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## **3. Membership, Roles, and Responsibilities**

The Committee shall consist of members selected to provide relevant expertise and stakeholder representation aligned with its purpose. The Committee serves in an advisory capacity and does not have governing or decision-making authority. Recommendations developed by the Committee will be forwarded to the Board of Directors for review and final decision. The Board of Directors retains full authority over all official actions and approvals. The Committee will strive to reach consensus in developing recommendations.

### **Membership Composition**

Membership shall reflect diverse expertise across healthcare, public health, social services, and community-based sectors to support a comprehensive and informed approach to compliance and data integrity. Members may include representatives from HUB partner organizations with expertise in legal and regulatory compliance, data management and governance, contracting, information technology, privacy and security, quality improvement, human resources, and operations. At least one committee member shall be a community representative who brings lived experience to inform and ground the committee's work.

### **Roles and Responsibilities**

**Chair:** The Chair of the Compliance and Data Integrity Committee serves as a collaborative and trusted leader with a strong understanding of compliance, data governance, and privacy principles. The Chair facilitates committee meetings, promotes balanced and constructive discussion, upholds confidentiality and integrity, and coordinates closely with the Internal Compliance Team. The Chair helps ensure the committee's recommendations align with organizational goals, regulatory requirements, and ethical standards.



**Members:** Members contribute relevant subject-matter expertise, actively participate in committee discussions, and provide informed guidance and recommendations to support effective compliance and data integrity practices. Committee members serve in an advisory capacity and are not responsible for day-to-day operational activities.

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#### 4. Meetings

The Committee is expected to meet twice per year, with additional ad hoc meetings convened as needed. The overall time commitment is modest and averages less than one hour per month per member, including the Chair

- Below is a general guide to what a member’s commitment could look like.
- Meeting agendas and minutes shall be recorded and maintained in accordance with organizational policy.

| Role                  | Meeting Preparation & Review | Meeting Participation | Follow-up / Feedback | Estimated Hours per Meeting | Estimated Hours per Year                                  |
|-----------------------|------------------------------|-----------------------|----------------------|-----------------------------|---|
| <b>Chair</b>          | 2 hours                      | 1–1.5 hours           | 1–2 hours            | 4–6 hours                   | 8–12 hours (plus any time for occasional ad hoc meetings) |
| <b>General Member</b> | 1 hour                       | 1–1.5 hours           | 0–0.5 hour           | 2–3 hours                   | 4–6 hours (plus any time for occasional ad hoc meetings)  |

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#### 5. Authority

The Committee is authorized to:

- Review data requests and agreements
- Commission internal reviews or external audits as necessary.
- Recommend policy updates or resource allocations to support compliance and data quality initiatives.



- Escalate significant compliance or data breaches to the Board of Directors.
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## 6. Reporting Relationship

The Committee reports to the Board of Directors.

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## 7. Evaluation

The Committee will review its effectiveness and this Charter every 2 years, or sooner if needed, to ensure continued relevance and functionality. Any suggested revisions or improvements can be summarized in a short report and submitted to the Board of Directors for approval. The review process should be concise and focused on high-level feedback rather than detailed analysis.

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## 8. Adoption and Review

This Charter is approved by the Iowa Community HUB Board of Directors and becomes effective upon adoption. It shall be reviewed periodically or as needed to ensure continued alignment with regulatory, legal, and operational requirements. The Compliance and Data Integrity Committee will provide input and recommendations for any revisions, which will be submitted to the Board of Directors for approval.

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Approved by: Jimmy Reyes  
Board Chairman, Iowa Community HUB

Date: 3/18/2026