



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 oversight and 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.

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. 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.

C. 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.

D. 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.

3. Membership

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

Summary Notes:

- The Committee is expected to meet twice per year, with additional ad hoc meetings only if needed.
- The Chair has extra responsibility for facilitating meetings and coordinating them with Internal Compliance Team.
- Members primarily provide review, guidance, and recommendations; they are not responsible for operational tasks.



- Overall, the time commitment is modest and averages less than 1 hour per month per member or Chair.

Roles and Responsibilities

- **Chair:** The Chair of the Compliance and Data Integrity Committee will be a collaborative, trusted leader with a solid understanding of compliance, data governance, and privacy principles. They should be skilled at facilitating balanced discussions, guiding the committee toward clear recommendations, and maintaining confidentiality and integrity. The Chair works closely with the Internal Compliance Team to ensure the committee's advice supports organizational goals, regulatory requirements, and ethical standards.
- **Members:** May include representatives of the HUB's partners with expertise and experience in legal, compliance, data management, information technology, quality improvement, and operations.
- **Ex Officio Members:** The Chief Executive Officer and Director of Operations serve as non-voting ex officio members.

Membership shall reflect diverse expertise across healthcare, public health, social, and community sectors to ensure a comprehensive approach to compliance and data integrity.

4. Meetings

- The Committee shall meet twice annually and more frequently as needed to address compliance or data issues.
 - A quorum shall consist of a simple majority of members.
 - Meeting agendas and minutes shall be recorded and maintained in accordance with organizational policy.
-

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.
-

6. Reporting Relationship

The Committee reports to the Board of Directors.

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.

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.

Approved by: _____

Board Chairman, Iowa Community HUB

Date: _____