

MINUTES

North Broward Hospital District Board Of Commissioners
1700 Northwest 49th Street, Suite #150, Ft. Lauderdale, 33309

COMPLIANCE & ETHICS COMMITTEE 2:00 p.m., October 30, 2018

CALL TO ORDER 3:09 p.m.

MEETING ADJOURNED 3:29 p.m.

COMMITTEE MEMBERS ✓Commissioner Gregoire/Chair, ✓Commissioner Ure, ✓Commissioner Wellins, ✓Commissioner Klein, ✓Commissioner Berry

PRESENT Commissioner Angier (non-member), Beverly Capasso/CEO, Gino Santorio/COO, Alan Goldsmith/CFO, Nigel Crooks/CIA

NOT PRESENT Nick Hartfield/CCO, Lynn Barrett/General Counsel

PUBLIC COMMENTS None.

APPROVAL OF MINUTES None.

Commissioner Gregoire announced that she was not informed previously that the Chief Compliance Officer would not be attending the meeting, therefore she predicted the meeting would run shorter than expected. In addition, she noted that General Counsel was not in attendance to report what she could on the item titled, *Outside Counsel Liaisons*.

Discussion ensued regarding who should be reporting in the place of Board Reports, when they could not attend scheduled Committee or Board meetings.

NOTE: Ms. Barrett, General Counsel, arrived at 3:16 p.m.

TOPIC OF DISCUSSION

1. Annual report

Ms. Barrett reported that the Annual Report submission due date was extended to December 17th by the Monitor, as a result of extending the submission of the IRO Report to November 16th. There was concern expressed whether the Board would be given adequate time to review the Annual Report before having to sign off on it, taking into account it had to be submitted on time. Mr. Santorio recommended the sections that were already completed be given to the Board for review.

2. Hotline incidents

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None discussed due to absence of Chief Compliance Officer

3. Reportable events

Ms. Barrett reported that one reportable event was recently identified, similar to (2) reportable events reported at end of 2017. All three were physician employment agreements entered in 2014 /2015. The total compensation paid to the physicians could not be confirmed as being consistent with then current market value. It is required under the CIA to prepare and report a (SRDP) Stark Self Disclosure Protocol to Medicaid/Medicare services. An additional SRDP is being prepared and will be submitted to Medicaid/Medicare copying the Monitor.

Ms. Barrett confirmed that since 2015 there were zero employment agreements found to be in violation of Stark law. The issues being identified now are from before 2015.

Commissioner Berry opined that the Board should invite Ms. Ellis to a future meeting or if agreed to, he would travel to Washington to discuss an exit strategy from the CIA with the Monitor.

4. Compliance 360 contract flowchart

Mr. Goldsmith reported that a week prior to the meeting, the 360 contract process was returned to linear.

5. Outside counsel liaisons

None discussed.

ADJOURNMENT 3:29 p.m.

MOTION: It was ***moved*** by Commissioner Klein, ***seconded*** by Commissioner Berry, that:

THE COMPLIANCE & ETHICS COMMITTEE MEETING BE ADJOURNED.

Motion ***carried*** unanimously.

AUTHENTICATION OF MINUTES Patricia Alfaro, Special Assistant to the Board of Commissioners.

*Audiotape available upon request.

Respectfully submitted,

Commissioner Ray T. Berry
Secretary / Treasurer