

# NOTICE OF MEETING

## **NORTH BROWARD HOSPITAL DISTRICT**

### **BOARD OF COMMISSIONERS**

A Compliance and Ethics Committee meeting will be held on Tuesday, November 12<sup>th</sup>, 2019, immediately following the Governance Committee meeting, at the Broward Health Corporate Spectrum Location: 1700 Northwest 49 Street, Fort Lauderdale, Florida, 33309. The purpose of this committee meeting is to review and consider any matters within the committee's jurisdiction.

Persons with disabilities requiring special accommodations in order to participate should contact the District by calling 954-473-7481 at least 48 hours in advance of the meeting to request such accommodations.

Any person who decides to appeal any decision of the District's Board with respect to any matter considered at these meetings will need a record of the proceedings, and for such purpose, may need to ensure that a verbatim record of the proceedings is made which record includes testimony and evidence upon which the appeal is to be based.

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

**COMPLIANCE AND ETHICS COMMITTEE MEETING**  
**Immediately following the Legal Affairs and Governmental Relations Committee Meeting**  
**September 11, 2019**

1. **NOTICE**

Notice of this meeting is attached to the official Minutes as EXHIBIT I. The official Agenda for this meeting, as presented for the consideration of the Committee, is attached to the official Minutes as EXHIBIT II.

2. **CALL TO ORDER** 2:37 p.m.

3. **COMMITTEE MEMBERS**

*Present:* Commissioner Nancy W. Gregoire, Chair  
Commissioner Christopher T. Ure  
Commissioner Ray T. Berry  
Commissioner Stacy L. Angier

*Not Present:* Commissioner Andrew M. Klein  
Commissioner Marie C. Waugh

*Senior Leadership*

*Additionally Present:* Gino Santorio/President/Chief Executive Officer, Alan Goldsmith/Chief Administrative Officer, Alex Fernandez/Chief Financial Officer, Linda Epstein/Corporate General Counsel, Jerry Del Amo/Sr. Associate, General Counsel

4. **PUBLIC COMMENTS** None

5. **ELECTION OF COMPLIANCE AND ETHICS COMMITTEE OFFICERS**

**MOTION** It was *moved* by Commissioner Berry, *seconded* by Commissioner Angier, to:

**Nominate Commissioner Nancy W. Gregoire as Chair of the Compliance and Ethics Committee for the North Broward Hospital District.**

Motion *carried* unanimously.

**MOTION** It was *moved* by Commissioner Gregoire, *seconded* by Commissioner Berry, to:

**Nominate Commissioner Christopher T. Ure as Vice Chair of the Compliance and Ethics Committee for the North Broward Hospital District.**

Motion *carried* unanimously.

## 6. APPROVAL OF MINUTES

- 6.1. Approval of Compliance and Ethics Committee meeting minutes, dated August 21, 2019

**MOTION** It was *moved* by Commissioner Angier, *seconded* by Commissioner Berry, to:

**Approve the Compliance and Ethics Committee meeting minutes, dated August 21, 2019.**

Motion *carried* unanimously.

## 7. TOPIC OF DISCUSSION

- 7.1. Chief Compliance Officer Report – Brian Kozik

### 7.1.1. Compliance Update

Mr. Kozik reported that closing meetings were currently taking place with regional CEOs to review results of the following audits

- Focus Arrangement
- Leases
- Call Coverage
- Medical Directorship

The following audits were still in progress and not yet completed

- Observation Stay/Condition code 44
- Acute Care Discharge Transfer
- Completed Home Health Claims (completed, report in drafting stage, closing meeting pending)
- Physicians at Teaching Hospital (PATH) Review for Modifier Reporting: SafeGuard retained by CMS to review Same Day Readmissions and Medicare's Two Midnight Rule for 55 claims. Deadline given to submit claim information by September 23, 2019

Departmental updates:

- Quarterly HIPAA Privacy/Security meeting held 09/05/19, discussions listed below
  - Privacy/Security incidents investigated by Corporate Compliance
  - Access to employees personal medical record
  - HIPAA privacy risk assessment (outside vendor)

# MINUTES

North Broward Hospital District Board Of Commissioners  
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- Secure texting update
- USB drives on devices
- Corporate Compliance & Ethics week: November 4-8

## 7.1.2. OIG / CIA Update

- Potential emergency purchase orders (PO) due to Hurricane Dorian reported to Monitor, which she approved. Eighteen PO's in total, none were focus arrangements.
- OIG conference call update held on 08/26/19 regarding stipulated penalty items
- IRO conference call held on 08/23/19. IRO proposed timeline for Transaction Review
- IRO correspondence received on 09/02/19 & 09/07/19 regarding status of Systems Review Report and planned Transaction Review
- OIG noticed on 08/30/19 of our (4) HIPAA breaches for the month.
- OIG approved all pending waiver requests
- (2) additional waivers requested, (1) already approved

## 7.2. GA-004-002 Compliance Office and General Counsel Protocol

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

**The Compliance and Ethics Committee recommend that the Board of Commissioners of the North Broward Hospital District approve the GA-004-002 Compliance Office and General Counsel Protocol.**

Motion *carried* unanimously.

## 7.3. Compliance Training: Board Members

Mr. Kozik presented a compliance training related to a financial conflicts of interests scandal at the University of Maryland Medical System that included several of the organization's leaders and Board Members.

**ADJOURNMENT** 3:05 p.m.

**MOTION** It was *moved* by Commissioner Angier, *seconded* by Commissioner Berry to:

**Adjourn the Compliance and Ethics Committee meeting.**

Motion *carried* unanimously.

Respectfully submitted,  
Commissioner Stacy L. Angier, Secretary/Treasurer