

# MINUTES

## NORTH BROWARD HOSPITAL DISTRICT

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

### COMPLIANCE & ETHICS COMMITTEE

January 22, 2019

**CALL TO ORDER** 1:49 PM

#### **COMMITTEE MEMBERS**

- ✓ Commissioner Nancy w. Gregoire, Chair
- ✓ Commissioner Andrew M. Klein
- ✓ Commissioner Christopher T. Ure
- ✓ Commissioner Ray T. Berry
- ✓ Commissioner Stacy L. Angier
- ✓ Commissioner Marie C. Waugh (via phone conference)

**PRESENT** Gino Santorio/President/CEO, Alan Goldsmith/Acting CAO, Alex Fernandez/Acting CFO, Jerry Del Amo/Managing Senior Associate General Counsel, Brett Bauman/Associate General Counsel, Nigel Crooks/Chief Internal Auditor

**PUBLIC COMMENTS** None

#### **APPROVAL OF MINUTES**

1. Approval of the Compliance and Ethics Committee meeting minutes, dated September 12, 2018

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

**APPROVE THE COMPLIANCE AND ETHICS COMMITTEE MEETING MINUTES DATED  
SEPTEMBER 12, 2018.**

Motion *carried* unanimously.

2. Approval of the Compliance and Ethics Committee meeting minutes, dated October 30, 2018

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

**APPROVE THE COMPLIANCE AND ETHICS COMMITTEE MEETING MINUTES DATED  
OCTOBER 30, 2018.**

Motion *carried* unanimously.

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3. Approval of the Compliance and Ethics Committee meeting minutes, dated November 26, 2018

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

**APPROVE THE COMPLIANCE AND ETHICS COMMITTEE MEETING MINUTES, DATED NOVEMBER 26, 2018.**

Motion *carried* unanimously.

Interim Chief Compliance Officer, Steve Forman, introduced the Compliance and Ethics staff members who then gave a brief description of their background and responsibilities.

### **TOPIC OF DISCUSSION**

4. Interim Chief Compliance Officer Report

- a. Plan of Correction from the IRO Report

Mr. Foreman reported he has spoken to the IRO at Baker Donelson regarding the report of their findings so that a plan of correction in response can be submitted.

- b. Status of the Corporate Integrity Agreement

- Sanction Screening
- Training
- Reportable Events
- Discussions with the OiG Monitor
- Discussions with the IRO

Mr. Forman detailed the areas of improvement within the department including implementation of staff meetings, filling vacant positions and provide trainings and annual performance evaluations. In addition, Mr. Forman provided insight on his long term goals so that the Organization be in compliance moving forward.

- c. Operation of the Executive Compliance Group

Mr. Forman summarized the discussion from the first Executive Compliance Group meeting held December 18<sup>th</sup>, 2018. He referenced the Executive Compliance Group Charter, which listed various Committees created to manage compliance issues and monitoring the Corporate Integrity Agreement. Discussion ensued regarding a cultural change throughout the Organization, as a whole.

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Mr. Foreman introduced the Chairs of the 8 Sub Committees of the Executive Compliance Workgroup, who then touched upon areas of focus and goals within their group.

d. Auditing and Monitoring Activities

Mr. Forman reported an audit manual has been created to provide structure and understanding of the audit process. The manual will also apply demonstration and discipline of evidence.

e. Training Plan for Year 4

Per the Corporate Integrity Agreement, a training plan is required and approved by the Monitor. Mr. Forman reported that the deadline to complete training for year 4, is August 31, 2019.

f. Disclosures Management

Mr. Forman reported that a disclosure breach was found as a result of not following stipulations referenced in the Corporate Integrity Agreement. All disclosures are now being reconciled in system, Comply 360.

g. Focus Arrangements Processing - No update provided

h. Conflicts of Interests Processing

Mr. Forman reported issues related to the times that conflicts of interest from physicians and hospital employees are received. He further stated that the department is working on streamlining the process so that the system be more effective.

5. Regulatory Environment Report - No update provided

**MEETING ADJOURNED** 3:54 PM

**MOTION** It was ***moved*** by Commissioner Klein, ***seconded*** by Commissioner Ure, to:

**ADJOURN THE COMPLIANCE AND ETHICS COMMITTEE MEETING.**

Motion ***carried*** unanimously.

Respectfully submitted,  
Commissioner Ray T. Berry  
Secretary / Treasurer

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