

MINUTES

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

**COMPLIANCE AND ETHICS COMMITTEE
Immediately Following
Legal Affairs and Governmental Relations Committee Meeting
March 21, 2019**

CALL TO ORDER 12:28 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 (absent)

ADDITIONALLY PRESENT Gino Santorio/President/CEO, Alan Goldsmith/CAO, Alex Fernandez/CFO, Jerry Del Amo/Managing Senior Associate, Marian Wossum/Interim General Counsel Designee, Steve Forman/Interim Chief Compliance Officer, Nigel Crooks/Chief Internal Auditor

PUBLIC COMMENTS None

APPROVAL OF MINUTES

1. Approval of the Compliance and Ethics Committee meeting minutes, dated February 20, 2019

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

APPROVE THE COMPLIANCE AND ETHICS MEETING MINUTES, DATED FEBRUARY 20, 2019.

Motion *carried* unanimously.

Interim Chief Compliance Officer, Steve Forman, introduced additional staff from the Compliance and Ethics department who then gave a brief description of their backgrounds and responsibilities within the department.

Mr. Forman reported that the new Chief Compliance Officer, Mr. Brian Kozik would officially be starting his tenure on April 1st, 2019.

He also announced that he was in the process of putting together a report summarizing all that was accomplished during his time as Interim Chief Compliance Officer.

MINUTES

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

Mr. Forman reported the he was in communication with the Monitor, Laura Ellis, related to the selection of permanent Chief Compliance Officer.

TOPIC OF DISCUSSION

2. Interim Chief Compliance Officer Report

a. Report from the Executive Compliance Group

Mr. Forman provided an update on the progress that had been made related to the deficiencies he reported at the January, 2019 committee meeting.

Commissioner Klein noted that he wanted the minutes of the Compliance meeting to reflect the substance of the discussion.

Mr. Forman credited Denise Moore for a job well done on the Code of Conduct.

Mr. Goldsmith reported that a subcommittee had been formed to strictly manage IRO responses and CIA requirements.

Commissioner Berry announced that he had scheduled an introductory call with the Monitor on the following day.

Note: Mr. Forman modified the order of items listed on the agenda.

- IRO Plan of Correction

Beth Cherry updated the committee on her subgroup's recent activities related to the IRO Plan of Correction. She further reported on the progress of the spreadsheet available on Sharefile.

- Training

Melanie Hatcher updated the Committee on the timeline and progress of the organization's compliance trainings, attestations and reconciliations.

- Sanction Screening

Lee Ghezzi reported that the sanction screening subgroup reviewed the areas they felt had gaps, which most were since closed. He further reported on issues and plan of action related to the current manual correlation process. Sanction screenings are being received from numerous locations causing a lot of legwork for the compliance department. A meeting has been scheduled with IT to discuss the implementation of an electronic mechanism to correlate and decrease duplicates.

MINUTES

- Disclosures
 - Disclosures Detail

Mr. Forman further reported on the status of Disclosures and issues related to reporting disclosures in real time by managers at the facility level. There are over 180 open disclosures, 55 of which are over a year old.

- Conflict of Interest
No report given

- HIPPA
No report given

- Risk Assessment, Auditing and Monitoring

Alex Fernandez reported that moving forward compliance meetings will be held and run by regional management in an effort to strengthen the organizational's level of compliance from the bottom up. Metrics will be provided to the compliance department so that a corrective plan could be formulated.

In regards to the Auditing and Monitoring subgroup, the annual audit risk assessment will be combined with compliance's risk assessment so that there is one master list for the organization.

- Code of Conduct

Mr. Forman reported in absence of Denise Moore on the status of the Code of Conduct, Policies and Procedures.

David Clark reported on a new subcommittee project that would take a year to review related to 3,474 policies found in eight (8) manuals in total. The committee will receive quarterly updates on the progress.

Discussion ensued regarding the process of how a quality of care issue would be investigated and reported. Mr. Ghezzi explained the current process in detail.

Regulatory Environment Report / Training

- False Claims Act

Mr. Forman gave the committee a short training on the history of False Claims Acts and the difference between the civil false claims act and the criminal false claims act.

MINUTES

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

3. Call Policy Exhibit

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

RECOMMEND THAT THE BOARD APPROVE THE ON-CALL COVERAGE POLICY.

Motion *carried* unanimously.

Mr. Santorio thanked Mr. Forman for his contribution, support and for agreeing to stay on as a consultant for an extended time.

ADJOURNMENT 1:37 pm

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

ADJOURN THE COMPLIANCE AND ETHICS COMMITTEE MEETING.

Motion *carried* unanimously.

Respectfully submitted,
Commissioner Ray T. Berry
Secretary / Treasurer

APPROVED