

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.

MINUTES

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
1700 Northwest 49th Street, Suite #150, Ft. Lauderdale, 33309

- 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