

COMPLIANCE AND ETHICS COMMITTEE
Immediately Following
Legal Affairs and Governmental Relations Committee Meeting
April 17, 2019

CALL TO ORDER 11:17 am

COMMITTEE MEMBERS

- Commissioner Nancy W. Gregoire, Chair
- Commissioner Andrew M. Klein
- Commissioner Christopher T. Ure
- Commissioner Ray T. Berry
- Commissioner Stacy L. Angier (WebEx)
- Commissioner Marie C. Waugh (WebEx)

ADDITIONALLY PRESENT Gino Santorio/President/CEO, Alan Goldsmith/CAO, Alex Fernandez/CFO, Jerry Del Amo/Managing Senior Associate, Steve Forman/ Compliance Consultant, Brian Kozik/Chief Compliance Officer, Nigel Crooks/Chief Internal Auditor, Lee Ghezzi/VP Quality and Case Management, Melanie Hatcher/VP Human Resource, Denise Moore/VP Marketing, Beth Cherry/SVP Physician Practices, Lauren Brown/Director Compliance/Privacy Ops.

PUBLIC COMMENTS None

APPROVAL OF MINUTES

1. Approval of the Compliance and Ethics Committee meeting minutes, dated March 21, 2019

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

**APPROVE THE COMPLIANCE AND ETHICS MEETING MINUTES DATED
MARCH 21, 2019.**

Motion *carried* unanimously

Commissioner Gregoire welcomed Broward Health's new Chief Compliance Officer, Brian Kozik, to his first Compliance and Ethics Committee meeting. Mr. Kozik shared a brief overview of his professional background.

TOPIC OF DISCUSSION

2. Chief Compliance Officer Report
 - a. Report from the Executive Compliance Group

Mr. Kozik reported on activities that had taken place within the compliance department during the first three weeks of his tenure.

Discussion ensued on whether Commissioner Gregoire could attend the DC meeting with Senior Management and Chairman Klein, without the risk of causing a Sunshine violation.

- Mr. Kozik shared that he spoke to the new IRO who was interested in meeting with the Board of Commissioners. He further reported that the IRO would be requesting materials for review, prior to providing a draft report.

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

- IRO Plan of Correction – Beth Cherry

Ms. Cherry updated the committee on the progress of pending items listed on the IRO plan of correction. Projected completion date for said items was moved from April 30th to June 30th. Commissioner Gregoire inquired if Mr. Cobo and Mr. Lewis could have access to the plan of correction spreadsheet. Mr. Santorio stated that he would want the legal department to vet the request before confirming it could be shared with outside parties.

- Training – Melanie Hatcher

Ms. Hatcher reported that the 3 year compliance training for 8,134 people was completed. Year 4 will be launched on May 13th, 2019.

- Disclosures – Lauren Brown

Ms. Brown reported a significant reduction of open disclosures that were over two years old. In regards to trends, HIPAA was identified as the largest disclosure group, Human Resources second, and Policy and Procedures third. Ms. Brown and Mr. Kozik planned on sharing current trends and enhancements with the Monitor and asking for her suggestions. Trends will be provided on the SharePoint drive.

- Sanction Screening – Lee Ghezzi

Mr. Ghezzi reported that the sanction screening on employees, residents, volunteers, vendors and students had been completed. Populations that were not captured are now being appropriately screened. Policies and forms are being refined to make screening more efficient.

- Risk Assessment, Auditing and Monitoring – Alex Fernandez

Mr. Fernandez reported that two of the facilities hosted their first regional compliance meetings. The outcomes of the monthly meetings would be standardized and tracked. The audit department's annual risk assessment report would be combined those from the compliance arena, so that there be one system wide risk assessment list. The goal is to have them all completed by the end of the fiscal year.

- Code of Conduct – Denise Moore

Denise Moore reported that the Code of Conduct engagement strategy had recently launched to bring awareness to employees. She further reported that the compliance department completed a thorough inventory of current policies. The plan was to prioritize what could be crossed off the

inventory, revise policies that were outdated and decide what constituted a policy versus a procedure.

3. Regulatory Environment Report / Training – Steve Forman

- Compliance Reporting to the Board of Commissioners

Steve Forman shared a presentation listing the types of compliance data that should be reported to the committee.

Discussion ensued on which departments had the authority to engage in investigations and how qualified they were. Mr. Kozik suggested that an external investigative trainer be brought in to instruct each department on how to appropriately conduct an internal investigation.

Chairman Klein discussed and summarized the state of the compliance program from the last 18 months to present and the substantial progress that has been made in the last 120 days.

ADJOURNMENT 12:36 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