

COMPLIANCE AND ETHICS COMMITTEE
Immediately Following
Legal Affairs and Governmental Relations Committee Meeting
July 24, 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 11:05 am.

3. 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 (joined WebEx @ 11:41 am)

ADDITIONALLY PRESENT Gino Santorio/President/CEO, Alan Goldsmith/CAO, Alex Fernandez/CFO, , Linda Epstein/General Counsel, Jerry Del Amo/Managing Sr. Associate, General Counsel, Brian Kozik/SVP, Compliance and Privacy, Steve Forman/Compliance Consultant, Nigel Crooks/Chief Internal Auditor.

4. PUBLIC COMMENTS None.

5. APPROVAL OF MINUTES

Approval of the Compliance and Ethics Committee meeting minutes, dated June 25, 2019.

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

**APPROVE THE COMPLIANCE AND ETHICS COMMITTEE MEETING
MINUTES DATED JUNE 25, 2019.**

Motion *carried* unanimously.

6. TOPIC OF DISCUSSION

6.1. Chief Compliance Officer Report – Brian Kozik

6.1.1. Compliance Update

Mr. Kozik updated the committee on the departmental activities since his last monthly report.

- Quarterly meetings with audit department.
- Finalizing annual conflict of interest process for organization
- Ambulatory department access to ComplianceTrac disclosure log
- Regional ambulatory compliance committee meeting launch
- 3rd quarter Focused Arrangement audit.
- Tracking remuneration audits for leases, call coverage, and medical directorships
- Conclusion of hyperbaric oxygen therapy service issue
- Overpayment of outpatient claim, 48 hour rule
- Interviews and proposals for external compliance auditing firms

6.1.2. OIG/CIA Update.

- Creation of new subgroup, Annual Audit Reporting
- Status on items requested by Monitor that were not listed in CIA
- CIA training for covered persons
- Individual waivers approved by Monitor
- Status of blanket waivers requested
- Status on sleep study audit
- IRO visit and interviews
- Stipulated penalty letter request

6.3 Report from Executive Compliance Group.

* Mr. Kozik modified the reporting order of the Subgroups below

6.3.1 Training – Melanie Hatcher

Ms. Hatcher reported that year-four online training for the organization was finalized at a completion rate of 97.76% and that the manager year-four live training launched July 1, 2019. Credentialed physician's training had a 91% completion rate. Ms. Hatcher further reported that the Procurement Steering Committee approved the Health Stream training module for compliance and HIPAA.

6.3.5 Policies – Denise Moore

Ms. Moore reported on the status of various policies for the compliance department, which included (21) policies to date.

* Mr. Kozik added item, IRO Plan of Correction, to the agenda – Beth Cherry

Ms. Cherry reported that 77% of all items that were on the plan of correction had been completed and that only 10 items remained.

6.3.3 Disclosures – Lauren Brown spoke for Dr. Calderon, who was absent

Ms. Brown reported that the open disclosures that were two-plus years old, had decreased 14 to 9. She further reported that there were approximately 160 open disclosures that were approximately a year old.

* Commissioner Waugh joined the discussion telephonically, via WebEx.

6.3.4 Risk Assessment – Zari Watkins.

Ms. Watkins reported on the progress of the risk assessment and confirmed the process had been formally memorialized, as required by the CIA. Senior Management risk assessment training took place on July 12, 2019. The IT department was in the process of retaining a data collection solution company, in which Tableau was being considered. Ms. Watkins further reported that the assessment would be scored by the Chief Financial Officer, Chief Administrative Officer and Chief Internal Auditor so that the organization could prioritize on the highest risks scored.

* Mr. Kozik confirmed that the Sanction Screening subgroup would not be reporting this month.

6.2 Policy Approval

6.2.1 GA-001-015 Conflict of Interest Policy – Brian Kozik and Lauren Brown

Policy revisions were suggested for subsections (b) and (d) to be consistent with language provided in subsection (c). The compliance department was asked to bring revisions to the following week's board meeting for consideration.

MINUTES

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

6.2.2 GA-004-012 Gifts Gratuities and Business Courtesies Policy

* Commissioner Berry he stepped away during the GA-004-012 Gifts Gratuities and Business Courtesies policy discussion and vote, however a quorum remained present.

6.2.3 Gifts and Gratuities Matrix

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

APPROVE THE GA-004-012 GIFTS GRATUITIES AND BUSINESS COURTESIES POLICY.

Motion *carried* unanimously, (5/0, Commissioner Berry temporarily not present).

6.3 Special Compliance Liaison – Steve Forman.

* Commissioner Berry rejoined the meeting during Mr. Forman’s presentation.

Mr. Forman presented a PowerPoint training module titled, Overview of Assessing Regulatory Risks.

7. **ADJOURNMENT** 12:07 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 Stacy L. Angier, Secretary/Treasurer