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Sponsor:	Brian Kozik: SVP, COMPLIANCE & PRIVACY
Section:	GA-Corporate Compliance
Manuals:	Compliance

GA-004-443 Tracking and Monitoring Activities

I. Purpose

This policy provides guidelines to monitor the internal controls in place to process payments to Referral Source Arrangement providers.

II. Key Terms

For purposes of this Policy, the following terms shall have the meanings set forth below wherever they appear in this Policy, regardless of whether they are capitalized, unless:

1. The context in which they are used clearly requires a different meaning; or
2. A different definition is prescribed for a particular section of this Policy.

Words not defined shall be given their common and ordinary meaning unless the context in which they are used requires otherwise.

Referral Source Arrangement: Every Arrangement that is between North Broward Hospital District dba ("Broward Health") and a Referral Source.

Internal Stakeholder: Broward Health employee responsible for the management of the agreement, including payment approvals.

PO25: Purchase order issued for contracted services.

Referral Source: A physician or physician's immediate family member or person, or entity that is an actual source or recipient of healthcare business or referrals to or from Broward Health.

Tracking Remuneration: The process of monitoring internal controls developed to verify all payments made to Referral Source Arrangements are in accordance with the terms of the agreement.

III. Policy

Tracking remuneration is a process of monitoring internal controls developed to verify all payments made to Referral Sources are in accordance with the terms of the Referral Source Arrangement. Broward Health is required to:

- a. Track remuneration to and from all parties to Referral Source Arrangements;
- b. Track service and activity logs to ensure that parties to a Referral Source Arrangement are performing the services required under the applicable Referral Source Arrangement(s) (if applicable); and
- c. Monitor the use of leased space, medical supplies, medical devices, equipment, or other patient care items to ensure that such use is consistent with the terms of the applicable Referral Source Arrangement(s) (if applicable).

IV. Procedures

a. Monitoring through Attestations

1. Annually, the Regional Chief Financial Officers ("Regional CFO"), or designee, are required to attest that the internal controls based on agreement type are being monitored and tracked appropriately according to the policy [GA-004-441 Physician and Non-Physician Financial Arrangement Review, Approval, Tracking and Monitoring](#). The attestations must be signed and dated by the Regional CFOs and sent to the Corporate Compliance and Ethics Department within 10 days of distribution. The Regional CFO may add exceptions to the attestation (please see Attachments) if an internal control was not monitored or if an agreement was paid outside of contract/agreement terms.
2. Any exceptions to the attestation must be reviewed by the Corporate Compliance and Ethics Department, in collaboration with Internal Stakeholders, or anyone else involved, and as required, and a corrective action plan must be created by the Internal Stakeholders which will be monitored by the Corporate Compliance and Ethics Department.

b. Auditing

1. At least annually, as required by the policy by [GA-004-441 Physician and Non-Physician Financial Arrangement Review, Approval, Tracking and Monitoring](#), the Corporate Compliance and Ethics Department will review a random sample of Referral Source Arrangements to determine that the remuneration paid pursuant to the Referral Source Arrangement was consistent with the terms of the agreement.
2. The Corporate Compliance and Ethics Department will complete focused audits periodically to verify the internal controls are effective and working as designed.
3. The Corporate Compliance and Ethics Department will also work with Internal Stakeholders to identify any additional risks, which will be included for auditing through the development of the annual Corporate Compliance Department Work Plan.
4. All audits will be completed in accordance with the Corporate Compliance and Ethics Department Audit Policies and Procedures.
5. All audit results will be provided to the Executive Compliance Group and a summary will be provided to the Compliance & Ethics Board Committee of the Board of Commissioners.

c. Additional Reviews

1. The Corporate Compliance and Ethics Department will conduct periodic reviews of various payment sources to verify there are no variances in payment between the current spend and contractual maximum compensation and to verify that the maximum compensation amount is not exceeded.

V. Related Policies and Compliance Documents

- a. Broward Health Code of Conduct
- b. [GA-004-500 Call Coverage Policy](#)
- c. [GA-004-345 Compliance Audit and Monitoring](#)
- d. [GA-004-013 Medical Director/Program Director Arrangements](#)
- e. [GA-004-441 Physician and Non-Physician Financial Arrangement Review, Approval, Tracking and Monitoring](#)
- f. [GA-016-006 Physician Recruiting Agreements](#)

g. [GA-510-001 Tracking and Monitoring of Medical Office Buildings](#)

Attachments

[Tracking and Monitoring Activities Documentation and Attestation](#)

Approval Signatures

Step Description	Approver	Date
Final Approver	Brian Kozik: SVP, COMPLIANCE & PRIVACY	12/2021
	Lucia Pizano-Urbina: AVP, COMPLIANCE [LH]	12/2021