



NORTH BROWARD HOSPITAL DISTRICT  
BOARD OF COMMISSIONERS  
**COMPLIANCE COMMITTEE MEETING**

1700 NW 49<sup>th</sup> Street, Ste. 150

Fort Lauderdale, FL

**MAY 30, 2018**

**MINUTES**

**MEETING CALLED TO ORDER:** 2:18 p.m.

**COMMITTEE MEMBERS:**

- ✓ Commissioner Gregoire
- ✓ Commissioner Klein
- ✓ Commissioner Ure
- ✓ Commissioner Wellins
- ✓ Commissioner Berry

**PUBLIC COMMENTS:** No public comments

**APPROVAL OF MINUTES:**

1. Approve Compliance Committee Meeting Minutes for October 25, 2017
2. Approve Compliance Committee Meeting Minutes for November 27, 2017
3. Approve Compliance Committee Meeting Minutes for March 21, 2018

**MOTION:**

1. Motion was made by Commissioner Klein to approve the Compliance Committee Meeting Minutes for October 25, 2017. The motion was seconded by Commissioner Wellins.

**Motion carried unanimously.**

2. Motion was made by Commissioner Klein to approve the Compliance Committee Meeting Minutes for November 27, 2017. The motion was seconded by Commissioner Wellins.

**Motion carried unanimously.**

3. Motion was made by Commissioner Klein to approve the Compliance Committee Meeting Minutes for March 21, 2018. The motion was seconded by Commissioner Wellins.

**Motion carried unanimously.**

**TOPIC OF DISCUSSION:**

**1. Hotline Reports**

Nick Hartfield, Chief Compliance Officer, explained the Hotline Process and how the Compliance Department receives its reports. There are two ways to report an incident. One of the options available to the community or any Broward Health Employee that may want to report potential compliance issues is via a call center number. Navex is the company contracted to handle incoming calls so that the caller isn't speaking to Broward Health Personnel. The second way to receive potential compliance issues is through an email address available at the Broward Health website. A report is generated through Navex and then sent to the Compliance Department. Mr. Hartfield reported that between January 1<sup>st</sup>, 2018 and May 30<sup>th</sup>, 2018, eighty-three (83) complaints were received through the phone and email hotline. Almost 50% of the reports received were related to human resource. Twenty-three percent (23%) were quality care related. If the issue reported is a human resource issue, the report is sent to the Human Resource Department for investigation. If it's a quality care issue, it is sent to the Quality Care Department, and so on, for review, investigation and response. Mr. Hartfield further reported that there is a report/template that each department fills out listing what the allegation was, what steps of action were taken and what was found. The Compliance Department then adds the incident to their Compliance Disclosure Log for tracking. In comparison, last year for the same time period, thirty-one (31) issues were reported compared to this year's eighty-three (83). Mr. Hartfield believes the incline is a result of the support and commitment given by Senior Leadership, the cooperation of both the Compliance and Legal Departments and all the education and trainings that have been occurring at Broward Health. If an issue is routed to another department, Compliance asks that they report back within two weeks. There is one dedicated person in the Compliance Department that tracks all incidences. To ensure the outside departments took the proper steps, a meeting is scheduled to discuss and ensure the incident was handled correctly before closing the case. Mr. Hartfield confirmed that the outcome of the cases, being founded or unfounded, were not being reported back to the Board. However, if the issue rose to a level

of a reportable event or something that could become public, he would indeed report it to the Board.

Commissioner Berry recommended that a category be added to the report, titled Founded or Unfounded. Mr. Hartfield agreed to add a column for the next meeting reporting whether the incidents were founded or unfounded.

## **2. Ethics Overview**

Mr. Hartfield reported that the Compliance Department took over the Ethics Department as of the end of November 2017. He explained that when Broward Health enters into a contract, the entity or individual is asked to fill out both conflict of interest (COI) and financial ownership disclosure (FOD) forms. In the event something is disclosed on any of the forms, it is then routed to the Ethics Department for review, prior to entering into an agreement. In addition, all medical staff and certain key positions within the organization are given COI and FOD forms to complete yearly. Any disclosures made by employees are reviewed by the Ethics Department. Furthermore, all sponsorship requests are also reviewed by the Ethics and Compliance Department. Mr. Hartfield reported that the COI policy is currently being updated to make it more understandable and practical for the current conditions at Broward Health. COI and FOD forms are also being updated.

Commissioner Wellins asked if the privacy policy related to employee social media has been recently reviewed.

Denise Moore, VP of Marketing & Communications, stated that there is a media policy that extends to social media, however the Marketing Department is currently working with the Legal Department to expand on the policy more globally.

Commissioner Wellins requested that Ms. Moore update the Board when the policy has been updated.

Commissioner Klein asked if in light of the new European Union Privacy Policy Update, is Broward Health considering updating their policies as well.

Ms. Barrett reported that both the Legal and Compliance Departments are currently reviewing what Broward Health's International Department may be doing in Europe that could lead Broward Health to be subject to the new EU policy.

## **3. Compliance Overview**

Mr. Hartfield provided an explanation of the structure to the current ORG Chart for the Compliance Department.

Commissioner Klein asked if the people listed on the ORG Chart had additional responsibilities other than those listed on the chart. Mr. Hartfield stated that their only responsibilities were the ones listed on the chart.

**MEETING ADJOURNMENT:**

Commissioner Wellins motioned to adjourn the meeting, seconded by Commissioner Klein.

**Motion carried unanimously.**

Meeting was adjourned at 2:47 p.m.

**Authentication of Minutes:** Patricia Alfaro, Special Assistant to the Executive Office.

\*Audiotape available upon request.