## Table of Contents

1. Notice of Meeting.................................................................................................................................2
2. Call to Order...........................................................................................................................................3
3. Roll Call..................................................................................................................................................3
4. Public Comments....................................................................................................................................3
5. Approval of Minutes...............................................................................................................................3
6. Topic of Discussion..................................................................................................................................5
   6.1. General Legal Department Updates.................................................................................................5
   6.2. BHC, Approve Agreement for Hospice and Palliative Care Services, Dr. Codada....................5
   6.3. BHMC and Salah Foundation, Pediatric & Adult Ophthalmology On Call Concurrent Services..............................................................8
   6.4. BHPG, Surgical Breast Oncology Clinical Services, Dr. Rable......................................................11
   6.5. Children's Diagnostic & Treatment Center, Extend Employment Contract, Dr. Rojas..................15
   6.6. BHIP and BHN, Establishment of Intensivist Services, GPA Specialty Care, LLC and NuView Telehealth, LLC......................................................................................................................18
7. Adjournment............................................................................................................................................20
NOTICE OF MEETING

NORTH BROWARD HOSPITAL DISTRICT

BOARD OF COMMISSIONERS

A Legal Affairs and Governmental Relations Committee meeting will be held on Wednesday, August 21st, 2019, immediately following the Audit Committee meeting, at the Broward Health Corporate Spectrum Location: 1700 Northwest 49 Street, Fort Lauderdale, Florida, 33309. The purpose of this committee meeting is to review and consider any matters within the committee’s jurisdiction.

Persons with disabilities requiring special accommodations in order to participate should contact the District by calling 954-473-7100 at least 48 hours in advance of the meeting to request such accommodations.

Any person who decides to appeal any decision of the District’s Board with respect to any matter considered at these meetings will need a record of the proceedings, and for such purpose, may need to ensure that a verbatim record of the proceedings is made which record includes testimony and evidence upon which the appeal is to be based.
LEGAL AFFAIRS AND GOVERNMENTAL COMMITTEE MEETING
Immediately Following ACO Board Of Directors 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** 10:46 am

3. **COMMITTEE MEMBERS**
   - √ Commissioner Andrew M. Klein, Chair
   - √ Commissioner Christopher T. Ure
   - √ Commissioner Ray T. Berry
   - √ Commissioner Nancy W. Gregoire
   - √ Commissioner Stacy L. Angier
   - X Commissioner Marie C. Waugh (not present)

**ADDITIONALLY PRESENT** Gino Santorio/President/CEO, Alan Goldsmith/CAO, Alex Fernandez/CFO, Linda Epstein/General Counsel, Jerry Del Amo/Managing Sr. Associate/General Counsel, Brett Bauman/Associate General Counsel, Nigel Crooks/Chief Internal Auditor.

4. **PUBLIC COMMENTS** None

5. **APPROVAL OF MINUTES**

   Approval of the Legal Affairs & Governmental Relations Committee meeting minutes, dated May 22, 2019.

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

**APPROVE THE LEGAL AFFAIRS & GOVERNMENTAL RELATIONS COMMITTEE MEETING MINUTES, DATED MAY 22, 2019.**

Motion carried unanimously.
6. **TOPIC OF DISCUSSION**

6.1. General Legal Department Updates – Linda Epstein

Ms. Epstein informed the board of new legal engagements for the month of July 2019, which included the Gray Robinson Law Firm to provide corporate governance and the Polsinelli Law Firm to provide healthcare regulatory guidance.

Ms. Epstein reported on activities within the first six weeks of her tenure, which included the following:

- Familiarizing herself with the legal department staff and their current roles
- Revising legal matter spreadsheets to include purpose, scope, turnaround time and cost
- Launching of electronic billing software, CounselLink
- Consideration of alternative outside counsel and expertise
- Regular meetings between the legal and compliance departments
- Regular meetings between the risk and legal departments
- Insurance coverage for legal matters

6.2. Governmental Affairs Update – Diana Arteaga

Ms. Arteaga reported on the following governmental activity:

- Critical Care Fund
- CON (certificate-of-need) repeal
- Amendment 12
- Medicare DSH, Disproportionate Share Hospital funding
- Surprise medical billing
- No Surprise Act

7. **ADJOURNMENT** 11:05 am

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

**ADJOURN THE LEGAL AFFAIRS AND GOVERNMENTAL RELATIONS COMMITTEE MEETING.**

Motion *carried* unanimously.

Respectfully submitted,
Commissioner Stacy L. Angier Secretary/Treasurer
# SUMMARY OF REQUEST

**DATE:** August 28, 2019

**FACILITY:** Broward Health Physician Group

**PROGRAM/PRODUCT LINE:** Hospice and Palliative Care

**REQUEST:** Approval to enter into a new two-year agreement up to the 92nd percentile with Dr. Shirley Codada for Hospice and Palliative Care clinical and medical directorship duties.

**PURPOSE:** To provide Hospice and Palliative Care services and within the community.

**CAPITAL REQUIRED:** None

**FISCAL IMPACT:** An independent third-party appraiser has determined: (1) the arrangement to be commercially reasonable, and (2) the total maximum compensation is within Fair Market Value (FMV).

**BUDGET STATUS:** Budgeted

**LEGAL REVIEW:** The contract is subject to General Counsel’s review and approval as to legal form and conditioned on no material changes in the approved business terms.

**APPROVED:** ___________________________  **DATE:** _______________

Gino Santorio, President/CEO BH
MEMORANDUM

TO: Board of Commissioners

FROM: Gino Santorio, President/CEO BH

DATE: August 28, 2019

SUBJECT: Approval to enter into a new 2-year Agreement up to the 92nd percentile with Dr. Shirley Codada for Hospice and Palliative clinical services and medical director duties.

BACKGROUND

The Physician Group of North Broward Hospital District d/b/a Broward Health ("Broward Health"), is seeking to enter into a new employment agreement with medical director duties with Dr. Shirley Codada. Dr. Shirley Codada obtained her Doctor of Medicine from University of Florida, College of Medicine, Gainesville, Florida in 1994 and completed an Internal Medicine Residency at Temple University Hospital, Philadelphia, PA in 1997. She became a Fellow of the American Academy of Hospice and Palliative Medicine in 2015. Dr. Codada is Board Certified in Hospice and Palliative Medicine and Board Certified in Internal Medicine. She maintains an unrestricted license to practice medicine in the State of Florida. As a safety-net hospital Broward Health is obligated to provide services to meet the community needs. To that end, Broward Health has documented and objectively determined there is a legitimate business purpose for the services of a qualified physician to provide clinical services and medical director duties in the medical specialty of Hospice and Palliative Care to Broward Health patients in Broward Health’s service area.

ACTION/PROJECT DESCRIPTION

Broward Health is requesting that the Board of Commissioners authorize the President/CEO to approve to enter into a new contractual agreement with Dr. Shirley Codada for a 2-year term. Specifically, the proposed salary is a two year guaranteed base salary set at the 31st percentile with twenty percent (20%) of the base salary at risk for satisfaction of quality and compliance metrics and a maximum clinical compensation set at the 38th percentile. A one-time sign on bonus and relocation, with Medical Directorship brings the overall maximum compensation to the 92nd percentile. There will be no opportunity for productivity based incentive compensation. The physician’s productivity, quality and compliance metrics will be monitored by BHPG administrative team and monthly scorecards will be provided to the physician.
FINANCIAL/BUDGETARY IMPACT

The proposed salary is budgeted for FY19.

JUSTIFICATION

Broward Health has documented and objectively determined that there is a legitimate business purpose to provide Hospice and Palliative Medicine Services at Broward Health Medical Center (BHMC).

There are currently no employed Hospice and Palliative Care specialists to provide clinical services in the Broward Health Medical Center Region. Previous services were provided by a community physician contracted to provide both medical director and clinical services. He and a physician employed by him provided hospice and palliative medicine clinical services at Broward Health Medical Center. He recently resigned and eliminated the employed physician position leaving a void in access to care and the availability of skilled physicians to support the patient needs.

As a licensed Medicare and Medicaid certified home hospice care service accredited by the Community Health Accreditation Program (CHAP), Broward Health is dedicated to supporting its mission to care for patients and families of those facing life threatening illness, death and bereavement. It is critical to employ Dr. Shirley Codada to support the community need for Hospice and Palliative Care Medical Director and clinical services in the Broward Health Medical Center Region to ensure access to patient care and availability of the appropriately trained physicians.

Recommendations from the Community Needs Assessment suggest that a critical priority is providing better access to care by enhancing access to specialists and primary care providers throughout the service area.

STAFF RECOMMENDATION

Therefore, it is requested that the Board of Commissioners of the North Broward Hospital District authorize the President/CEO to enter into a new 2-year employment with medical director agreement with Dr. Shirley Codada for the provision of Hospice and Palliative Medicine services at Broward Health Medical Center at the 92nd percentile.
SUMMARY OF REQUEST

DATE: August 28th, 2019

FACILITY: Broward Health Medical Center / Salah Foundation
Children’s Hospital

PROGRAM/PRODUCT LINE: Emergency Department Services
Pediatric and Adult Ophthalmology on call concurrent

REQUEST: Board approval to enter into contractual agreements for
Pediatric and Adult Ophthalmology concurrent on-call services at a fair market rate of compensation at the 90th percentile of national benchmark data.

PURPOSE: To provide concurrent Pediatric and Adult Ophthalmology
on-call coverage for Broward Health Medical Center’s / Salah Foundation Children’s Hospital Emergency Department.

CAPITAL REQUIRED: Not Applicable

FISCAL IMPACT: Annual compensation is within the fair market value and is commercially reasonable as documented by PYA, P.C. at the 90th percentile for concurrent Pediatric and Adult Ophthalmology on call.

BUDGET STATUS: Budgeted

LEGAL REVIEW: The contract is subject to General Counsel’s review and approval as to legal form and conditioned on no material changes in the approved business terms.

APPROVED: [Signature]
Gino Santorio, President/CEO BH

DATE: __________________________
MEMORANDUM

TO: Board of Commissioners
FROM: Gino Santorio, President/CEO BH
DATE: August 28th, 2019
SUBJECT: Board approval to enter into contractual agreements for concurrent Pediatric and Adult Ophthalmology on-call services at a fair market rate of compensation at the 90th percentile of national benchmark data.

BACKGROUND

Broward Health Medical Center (BHMC) is requesting approval to enter into a contractual agreement for concurrent Pediatric and Adult Ophthalmology on-call services. Broward Health has documented and objectively determined there is a legitimate business purpose for the services of qualified physicians to provide services in the specialties of Pediatric and Adult Ophthalmology.

BHMC is designated a level one trauma center and uses a team approach for optimal care of trauma patients. Adult and pediatric Ophthalmology is one of the required on call specialties for level one trauma centers. There are a limited number of pediatric and adult ophthalmologist in the community willing and able to take on call.

BHMC has two (2) pediatric physicians on the call coverage panel, and two (2) on the call coverage adult panel. The two pediatric physicians have communicated that they are unable to cover solely after October of 2019. One of the two Adult Ophthalmologist is qualified and willing to cover a concurrent coverage for on call.

ACTION/PROJECT DESCRIPTION

A fair market value (FMV) and commercial reasonableness (CR) assessment of the proposed arrangements for Adult and Pediatric Ophthalmology on-call services was conducted by an independent third party. The assessment determined that the request, at the 90th percentile for Ophthalmology of the national benchmark date, are within FMV for similar services being provided across the country and is commercially reasonable.

FINANCIAL/BUDGETARY IMPACT

Operating expense is budgeted.
JUSTIFICATION

To continue to provide Pediatric and Adult Ophthalmology on-call services at Broward Health Medical Center/ Salah Foundation Children’s Hospital.

STAFF RECOMMENDATION

Therefore, it is requested that the Board of Commissioners of the North Broward Hospital District authorize the President/CEO approval to enter into contractual agreements for concurrent Pediatric and Adult Ophthalmology on-call services at the 90th percentile.
SUMMARY OF REQUEST

DATE: August 28, 2019

FACILITY: Broward Health Physician Group

PROGRAM/PRODUCT LINE: Breast Oncology Service Line

REQUEST: Approval to enter into a new two-year employment agreement with program directorship at the 82nd percentile with Dr. Denise Rable for Surgical Breast Oncology services.

PURPOSE: To provide Surgical Breast Oncology clinical care services to the community.

CAPITAL REQUIRED: None

FISCAL IMPACT: An independent third-party appraiser has determined: (1) the arrangement to be commercially reasonable, and (2) the total maximum compensation is within Fair Market Value (FMV).

BUDGET STATUS: Budgeted

LEGAL REVIEW: The contract is subject to General Counsel’s review and approval as to legal form and conditioned on no material changes in the approved business terms.

APPROVED: ____________________________

DATE: ____________________________
MEMORANDUM

TO: Board of Commissioners

FROM: Gino Santorio, President/CEO BH

DATE: August 28, 2019

SUBJECT: Approval to enter into a new 2-year employment agreement with program directorship at the 82nd percentile with Dr. Denise Rable for Surgical Breast Oncology services

BACKGROUND

The Physician Group of North Broward Hospital District d/b/a Broward Health (“Broward Health”), is seeking to enter into a new employment agreement with program directorship with Dr. Denise Rable. Dr. Denise Rable received her Doctor of Medicine from University of Oklahoma, College of Medicine, Oklahoma City, OK, in 1990. She completed a Surgical Internship at University of Oklahoma Health Science Center in 1991, followed by a research Fellowship in Surgery in 1994, an assistant resident physician in general surgery and senior resident physician in general and peripheral vascular surgery in 1997. She then completed a Fellowship in Breast Disease at University of Oklahoma Institute for Breast Health in 1998. Dr. Denise Rable is a Fellowship Trained Breast Surgical Oncologist, certified by the American Board of Surgery, with considerable experience in developing comprehensive breast programs. As a safety-net hospital Broward Health is obligated to provide services to meet the community needs. Broward Health has documented and objectively determined that there is a legitimate business purpose for the services of a qualified physician to provide Breast Surgical Oncology services within the Broward Health service area.
ACTION/PROJECT DESCRIPTION

Broward Health is requesting that the Board of Commissioners authorize the President/CEO to approve to enter into a new contractual agreement with Dr. Denise Rable for a 2-year term. An independent third-party appraisal report determined that the proposed arrangement is commercially reasonable and the compensation is within fair market value. Specifically, the proposed salary is a two year guaranteed base salary set at the 57th percentile, twenty percent (20%) at risk for satisfaction of quality and compliance metrics and an overall maximum compensation at the 82nd percentile inclusive of a one-time sign on and relocation. There will be no opportunity for productivity based incentive compensation. However, the physician’s productivity, quality and compliance metrics will be monitored by BHPG administrative team and monthly scorecards will be provided to the physician.

FINANCIAL/BUDGETARY IMPACT

The proposed salary is budgeted for FY 20.

JUSTIFICATION

Broward Health has documented and objectively determined that there is a legitimate business purpose to provide Breast Oncology services at Broward Health Medical Center (BHMC).

There are currently no employed or community physicians that are Fellowship Trained Breast Surgical Oncologists within the BHMC region. With the rise in breast cancer our community patients are being referred outside of the system requiring them to travel for care which deters them from seeking the appropriate medical treatment needed. This is a difficult recruitment and over the last 3 years, 3 offers extended were ultimately declined.

Dr. Rable is highly respected in her field with extensive experience providing both clinical care and administrative leadership in the development of breast surgery programs. Dr. Rable will be employed to provide both clinical care and program directorship duties to meet the requirements for developing and pursuing NAPBC (National Accreditation of Breast Programs).

Dr. Rable will support the Lillian S. Wells Women’s Health Center at Broward Health Medical Center by expanding the oncology service line and providing patient access to local care. Broward Health will be able to meet the current and growing breast cancer patient needs, ensure physician availability to be able to provide clinical care of in hospital patients, follow up care and consults. The overall vision is to employ 1-2 additional breast oncologist to support patient needs and physician access across the healthcare system.

Recommendations from the Community Needs Assessment suggest that a critical priority is providing better access to care by enhancing access to specialists throughout the service area.
STAFF RECOMMENDATION

Therefore, it is requested that the Board of Commissioners of the North Broward Hospital District authorize the President/CEO to enter into a new 2-year employment agreement with program directorship with Dr. Denise Rable for the provision of Breast Oncology services at Broward Health Medical Center at the 82nd percentile.
SUMMARY OF REQUEST

DATE: August 28, 2019

FACILITY: Broward Health CDTC

PRODUCT LINE: Family Medicine / HIV Certification

REQUEST: Approval to enter into a First Amendment to Employment Agreement to extend Dr. Vanessa Rojas’ guaranteed salary for an additional twelve (12) months.

PURPOSE: To provide Family Medicine and HIV Services at Broward Health CDTC.

CAPITAL REQUIRED: None

FISCAL IMPACT: An independent third party appraiser has determined: (1) the arrangement is commercially reasonable, and (2) the total maximum compensation is within Fair Market Value (FMV).

BUDGET STATUS: Budgeted

LEGAL REVIEW: The contract is subject to General Counsel’s review and approval as to legal form and conditioned on no material changes in the approved business terms.

APPROVED: Gino Santorio 08/07/2019 19:46 Eastern Daylight
Gino Santorio, President/CEO
MEMORANDUM

TO: Board of Commissioners

FROM: Gino Santorio, President/CEO

DATE: August 28, 2019

SUBJECT: Approval to enter into a First Amendment to Employment Agreement to extend Dr. Vanessa Rojas’ guaranteed salary for an additional twelve (12) months.

BACKGROUND AND JUSTIFICATION

The North Broward Hospital District, d/b/a Broward Health, is seeking to enter into a First Amendment to Employment Agreement to extend Dr. Rojas’ guaranteed salary for an additional twelve (12) months.

Vanessa Rojas, M.D. entered into a two-year Employment Agreement with Broward Health effective August 20, 2018, which was approved by the Board of Commissioners of the North Broward Hospital District on July 26, 2018. Dr. Rojas was employed to provide clinical services in the medical specialty of Family Medicine and HIV services to Broward Health patients in the CDTC and CHS service areas. Pursuant to her Employment Agreement, Dr. Rojas’ compensation is structured as a guaranteed salary for her first year, and her second year includes base salary and compensation based on personal productivity, subject to compliance and quality measures being met.

Broward Health submitted Dr. Rojas’ government applications for Medicare and Medicaid credentialing; however, Dr. Rojas did not receive her Medicare number until January 31, 2019. This delay in receiving her Medicare number caused additional delays in managed care credentialing. Various managed care plans’ credentialing were completed in March 2019 and May 2019; however, due to these delays, Dr. Rojas was severely limited in the patient base that she could see.

Broward Health is seeking to amend Dr. Rojas’ Employment Agreement to extend her first-year guaranteed salary for an additional year to allow her time to build her practice with additional managed care credentialing.
ACTION/PROJECT DESCRIPTION

Broward Health is requesting that the Board of Commissioners authorize the President/CEO to approve to enter into a First Amendment to Employment Agreement to extend Dr. Vanessa Rojas’ guaranteed salary for an additional twelve (12) months.

An independent third party appraisal report determined that the starting physician compensation approximates the 75th percentile of regional benchmark data. Furthermore, the proposed base compensation for established physicians approximates the 33rd percentile of regional benchmark data, while the maximum proposed compensation approximates the median of regional benchmark data for established physicians.

FINANCIAL/BUDGETARY IMPACT

Budgeted in the CDTC Ryan White Part D grant.

STAFF RECOMMENDATION

Therefore, it is requested that the Board of Commissioners of the North Broward Hospital District authorize the President/CEO to approve to enter into a First Amendment to Employment Agreement to extend guaranteed salary for an additional twelve (12) months at the 75th percentile.
SUMMARY OF REQUEST

DATE: August 28, 2019

FACILITY: Broward Health Imperial Point
Broward Health North

PROGRAM/PRODUCT LINE: Establishment of Intensivist Services

REQUEST: In the interest of patient care, Broward Health Imperial Point and Broward Health North seek approval to establish a closed Intensive Care Unit (ICU), (mandatory co-management model) by entering into an exclusive agreement for Intensivist services.

PURPOSE: The purpose of this request is to ensure a higher level of patient quality is achieved.

CAPITAL REQUIRED: Not Applicable

FISCAL IMPACT: Broward Health Imperial Point total annual exposure $565,500
Broward Health North total annual exposure is $1,600,000

BUDGET STATUS: Intensivist services are budgeted.

LEGAL REVIEW: The contract is subject to General Counsel’s review and approval as to legal form and conditioned on no material changes in the approved business terms.

APPROVED: Gino Santorio 08/07/2019 19:45 Eastern Daylight
Gino Santorio, President/CEO BH

DATE: ______________
MEMORANDUM

TO: Board of Commissioners
FROM: Gino Santorio, President/CEO BH
DATE: August 28, 2019
SUBJECT: In the interest of patient care, Broward Health Imperial Point and Broward Health North seek approval to establish a closed Intensive Care Unit (ICU), (mandatory co-management model) by entering into an exclusive agreement for Intensivist services.

BACKGROUND

Broward Health Imperial Point and Broward Health North seek to enter into exclusive arrangements at each of the respective facilities for Intensivist Services with physicians who are specially trained and certified in critical care (Intensivists).

The purpose of this change is to advance the best interests of patient care, to enhance outcomes, reduce mortality and drive improved efficiency. Intensivist will provide 24/7 coverage to critically ill patients in the Intensive Care Units (ICU) at both hospitals. Research has shown that when ICU patients are cared for by an Intensivist, those patients experience reductions in length-of-stay and health care-associated infections, as well as, decreases in ICU mortality.

Under section 4.2.8 of the Medical Staff Bylaws, (Closing/Discontinuing a Service or Entering an Exclusive Contract), Broward Health may enter into an exclusive arrangement for the provision of professional medical services.

Broward Health Imperial Point’s Medical Executive Committee passed a resolution on July 16, 2019 to enter into an exclusive agreement. Broward Health North’s Medical Executive Committee agreed on August 13, 2019 to enter into an exclusive agreement with NuView Telehealth, LLC.

ACTION/PROJECT DESCRIPTION

In the interest of patient care, Broward Health Imperial Point and Broward Health North seek approval to establish a closed Intensive Care Unit (ICU), (mandatory co-management model) by entering into an exclusive agreement for Intensivist services.

FINANCIAL/BUDGETARY IMPACT

Intensivist services are budgeted. Broward Health Imperial Point’s total annual exposure is $565,500. Broward Health North’s total annual exposure is $1,600,000.
JUSTIFICATION

By establishing Intensivist services, both hospitals will ensure the comprehensive evaluation and management of the critically ill patients in the ICU.

The Intensivist coordinates the critical care program's multidisciplinary health care team, including the Intensivist, consulting physicians, nurses, respiratory therapists, pharmacists, dieticians and social services. The Intensivist also plays an integral role with the patients themselves and their families; and is responsible for ensuring a continuum of care and that all of the patients' needs are addressed.

Research shows the benefits associated with the Intensivist approach include:

- Decreases in ICU mortality
- Reduced ICU length of stay
- Fewer clinical and procedural complications
- Reduced costs per case
- Improved patient and staff satisfaction
- Focus on patient safety
- Promote optimal quality and continuity of patient care

Furthermore, establishing such services is an integral part of various safety scores, including The Leapfrog Group, which publishes specific criteria related to Intensivist programs.

Prior to recommending the exclusive arrangements, both hospitals discussed such matters with medical staff leadership, including the Medical Executive Committees, and physicians credentialed in various subspecialties.

Under the Intensivist program, at Broward Health Imperial Point, patients admitted to the ICU will be “admitted” under the direction of the exclusively contracted Intensivist group. A patient’s regular physician can be deemed a consulting physician on the case while the patient is admitted to the ICU. Accordingly, at the present moment, Imperial Point will not need to retract clinical privileges for physicians who currently maintain “Intensivist” privileges.

At Broward Health North, patients admitted to the ICU will be “admitted” under the direction of a Medicine, Family or Surgical physician. However, a consult to the exclusively contracted Intensivist group will be mandatory.

While other alternatives were considered, due to the aforementioned factors, as well as, the ability to assure 24/7 coverage, medical staff buy-in, and data supporting this recommendation, Broward Health Imperial Point recommends contracting such services with GPA Specialty, LLC and Broward Health North recommends contracting such services with NuView Telehealth, LLC.

STAFF RECOMMENDATION

Therefore, it is requested that the Board of Commissioners of the North Broward Hospital District authorize the President/CEO to enter into an exclusive arrangement for Intensivist services at Broward Health Imperial Point with GPA Specialty, LLC and at Broward Health North with NuView Telehealth, LLC.