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

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 Arrangements.

II. Key Terms

Referral Source Arrangement: Every Arrangement that 1) is between Broward Health and any actual source of health care business or referrals to Broward Health and involves, directly or indirectly, the offer, payment, or provision of anything of value; or 2) is between Broward Health and any physician (or a physician's immediate family member) (as defined at 42 C.F.R. § 411.351)) who makes a referral (as defined at 42 U.S.C. § 1395nn(h)(5)) to Broward Health for designated health services (as defined at 42 U.S.C § 1395nn(h)(6)).

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

PO25: Purchase order issued for contracted services.

Referral Source: A physician, contractor or entity that is an actual source of healthcare business or referrals to 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.

Any terms not defined herein shall have the meaning associated to them within the Policies and Procedures Glossary, Policy No. GA-004-237.

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 *Physician and Non-Physician Financial Arrangement Review, Approval, Tracking and Monitoring, GA-004-441*. The attestations must be signed and dated and provided to 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 *Physician and Non-Physician Financial Arrangement Review, Approval, Tracking and Monitoring, GA-004-441*, the Corporate Compliance and Ethics Department will review a random sample of 50 Focus Arrangements to determine that the remuneration paid to the Referral Source Arrangement was consistent with the terms of the agreement. This is an annual audit on the Corporate Compliance Work Plan.
2. The Corporate Compliance and Ethics Department will complete focused audits periodically (no less than quarterly) 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 Manual.
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.

C. Additional Reviews

1. The Corporate Compliance and Ethics Department will conduct a monthly review of the PO25 report (generated by Lawson) to verify there are no variances in payment between the current spend and contractual maximum compensation and to verify nothing is paid over of the maximum compensation amount.

2. The Corporate Compliance and Ethics Department will monitor payments in various payment sources (i.e. Lawson AP and Lawson Payroll) to verify contractual maximum compensations are not exceeded on an ongoing basis.
3. The Corporate Compliance and Ethics Department will complete Ad hoc reviews, as needed.
4. Any reviews will be completed using the standard Tracking Remuneration Review Worksheet.
5. Any variances found during the monitoring process will be reported to the relevant Internal Stakeholder(s).

V. Related Policies and Compliance Documents

- Broward Health Code of Conduct
- Call Coverage Policy, Policy No. GA-004-500
- Compliance Audit and Monitoring, Policy No. GA-004-345
- Medical Director/ Program Director Arrangements, Policy No. GA-04-013
- Physician and Non-Physician Financial Arrangement Review Approval Tracking and Monitoring, Policy No. GA-004-441
- Physician Recruiting Agreements, Policy No. GA-016-006
- Tracking and Monitoring of Medical Office Buildings and Lease Agreements, Policy GA-510-001

VI. References

Broward Health Corporate Integrity Agreement with the DHHS Office of Inspector General, dated August 20, 2015.

Attachments

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

Approval Signatures

Step Description	Approver	Date
Final Approver	Brian Kozik: SVP, COMPLIANCE & PRIVACY	08/2020
	Jennifer Mosley: EXEC SECRETARY/ANALYST	08/2020