

# NOTICE OF MEETING

## NORTH BROWARD HOSPITAL DISTRICT

### BOARD OF COMMISSIONERS

A Compliance and Ethics Committee meeting will be held on Wednesday, August 19, 2020, immediately following the Pension and Investment Committee meeting, via WebEx. The purpose of this committee meeting is to review and consider any matters within the committee's jurisdiction.

NOTE: These public Committee meetings shall be conducted only through communications media technology in accordance with Fla. Exec. Order No. 2020-69, as amended, and § 120.54(5)(b)2., Florida Statutes.

These meetings shall be open to the public who may attend by using the call-in toll number provided below:

Call-In Toll Number: (650) 479-3208

Meeting Access Code: 160 500 5353

Meeting Password: 2rZeMwmdE89

For the most updated information, please check our website as schedules may change for reasons beyond our control <https://www.browardhealth.org/pages/board-calendar>

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.

North Broward Hospital District Board Of Commissioners  
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### **COMPLIANCE AND ETHICS COMMITTEE MEETING Immediately following the Pension and Investment Committee Meeting JULY 22, 2020**

The Compliance and Ethics Committee of the North Broward Hospital District was held on July 22, 2020, immediately following the Pension and Investment Committee meeting, via WebEx video conference.

#### **1. NOTICE**

Official notice and agenda of this meeting is attached to the Minutes, as EXHIBIT I and EXHIBIT II, as presented for consideration of the Committee.

#### **2. CALL TO ORDER**

There being a quorum present, the meeting was called to order by Chair Nancy W. Gregoire at 11:46 a.m.

#### **3. COMMITTEE MEMBERS**

*Present:*

Commissioner Nancy W. Gregoire, Chair  
Commissioner Christopher T. Ure, Vice Chair  
Commissioner Ray T. Berry  
Commissioner Stacy L. Angier  
Commissioner Marie C. Waugh

*Senior Leadership*

*Additionally Present:*

Gino Santorio/President/Chief Executive Officer, Alan  
Goldsmith/Chief Administrative Officer, Alex  
Fernandez/Chief Financial Officer, Linda  
Epstein/Corporate General Counsel, Jerry Del Amo/Deputy  
General Counsel

#### **4. GOVERNOR'S EXECUTIVE ORDER ANNOUNCEMENT**

General Counsel delivered the Governor's Executive Order for the record, as seen below.

“This public board committee meeting is being conducted through communications media technology in accordance with the Governor's Executive Order No. 20-69, as extended by the Governor's Executive Order No. 20-150 and section § 120.54(5)(b)2 of the Florida Statutes. This meeting is open to the public, and the public may attend this meeting via telephone conference call. The conference call information is currently posted on Broward Health's website. All

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requirements of the Florida Sunshine Law are still in effect, including the memorialization of minutes. While not a requirement under Florida law, we will attempt to record this meeting and post it on Broward Health's website for the public and for those who may not be able to attend this live telephone conference.”

### 5. PUBLIC COMMENTS

None.

### 6. APPROVAL OF MINUTES

Staff Recommendation: That the Compliance and Ethics Committee of the North Broward Hospital District approve minutes dated June 17, 2020.

Staff recommendation *carried* without dissent.

### 7. TOPIC OF DISCUSSION

#### 7.1. Chief Compliance Officer Report – presented by Brian Kozik, SVP, Chief Compliance Officer

##### 7.1.1. Compliance Department Updates – presented by Brian Kozik, SVP, Chief Compliance Officer

Mr. Kozik reported on the status of audits that occurred in the past month, as listed below. He noted that the sub-committee leaders were in attendance to provide a brief overview of their areas of focus.

- Two-Midnight Rule Audit, completed.
  - 22% error rate resulted in a \$103k payback.
  - Subsequent audit in progress per OIG Monitor. If results are similar or worse, extrapolation against the bigger population will be required.
- Non-Focus Arrangements Audit, in progress.
  - Objective is to review sample contracts.
  - Verify internal controls, approval processes, and payment processes working as designed.
  - Review, 65% complete.
- Broward Health Medical Center's Institutional Review Board (IRB), in process.
  - Objective is to walk through FDA checklist to ensure IRB is functioning as designed and in compliance with Medicare and Medicaid service regulations.
- Focus Arrangements Review for CIA Year 5 Q2, in progress.
  - December 2019 through February 2020.

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- Objective to ensure internal review and approval processes and procedures were properly followed.
- Randomly select 40 arrangements across the following four groupings:
  - Physician leadership and call.
  - Physician leases.
  - Physician and resident employment.
  - Services (non-physician) and miscellaneous.
- Tracking and Remuneration audit for Employed Physician Agreements, in progress.
  - Objective to review payments made during review period and verify internal controls were effective and consistent with terms of agreement.
  - Randomly sample 30 agreements.
- Coding Audit for Q2, in progress at Broward Health Imperial Point.
- Observation Stay/Condition Code 44 Audit, complete.
  - When Hospital Utilization Review Committee changes physician's order for inpatient status to outpatient due to lack of certain criteria.
- SafeGuard Services Audit of Broward Health Medical Center Short Stay Claims to Medicaid, completed.
  - Closing meeting held.
  - Audit report pending due to Covid-19 pandemic.
- Greenberg Traurig Review of Broward Health's HIPAA Privacy Program, in process.
  - All policies and questionnaires requested, completed.
  - HIM on-site visit, completed.
  - Preliminary findings indicate Broward Health is in compliance with the rules and regulations for HIPAA.
- Conflict of Interest Survey, completed.
  - Plan for review in progress.
  - Any need for a corrective action plan, perceived conflict, or actual conflict will be addressed.
- Two Year Audit Plan, in progress.
  - Objective is to present draft plan in August (tentative).
  - Only open item will be Enterprise Risk Assessment.
- Compliance Work Plan – Fiscal Year 2020 Status
  - 29 reviews in total.
    - 14 reviews, completed.
    - 8 reviews, in progress.
    - 7 reviews pending commencement – to determine how many will roll over to the new year.
- Staffing
  - Adlin Tuya, Regional Compliance Manager (BHMC), transferred to the Legal department.

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- Chris Cuellar, Regional Compliance Manager (BHCS/BHIP), took a position with Jackson Memorial Hospital.
- Mark Green replaced Chris Quaya as Regional Compliance Manager (BHCS/BHIP).
- Camila Daza, from Contracting department, transferred to Compliance.
- Lucia Urbina-Pizano, promoted to Executive Director.

### 7.1.2. OIG/CIA Update (Presenter - Brian Kozik, SVP, Chief Compliance Officer)

- Annual Report Year 4
  - OIG response submitted on May 28, 2020.
- Sleep Study 6 year look back audit, requested by Monitor due to high error rate.
  - OIG self-disclosure protocols this week, if accepted.
  - Final settlement pending. \$1.168m previously paid back.
- HIPAA Breaches – June.
  - Two breaches reported to Monitor.
    - Impermissible Disclosures of patient PHI.
      - (1) Broward Health Medical Center.
      - (1) Broward Health Imperial Point.
    - Root-cause analysis performed.
    - Corrective action taken.
- IRO Communications for CIA Year 5 Plan
  - Confident systems review not needed but will launch transaction review.
  - Review cannot commence until August 31, 2020.
  - Completion target date is November 3, 2020.
- Post Corporate Integrity Agreement (CIA) Transition Plan
  - Steve Forman and General Counsel collaborating on plan.
  - Expert outside counsel engaged to review plan.
- Mandatory Compliance Training, completed.
  - Only outstanding completions are employees on family leave.

### 7.2. Executive Compliance Committee – Sub-Committee Report

#### 7.2.1. IRO Plan of Correction – presented by Linda Epstein, General Counsel

- System and Transaction Review
  - 59 items identified to strengthen our processes and procedures related to focus arrangements.
  - Executive Compliance Group (ECG) subcommittee charged to oversee that the abovementioned items are addressed and incorporated into the processes.
  - Status
    - 5 pending.

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- 3 substantially complete.
- 51 completed.

### 7.2.2. Disclosures/HIPAA/COI – presented by Dr. Ana Calderon Randazzo, Executive Director, CDTC

- Open disclosures
  - April 2019 – 173 open disclosures.
  - Current – 76 open disclosures.
  - 46% decrease year-over-year (YOY).
  - Percentage of open disclosures between 90 days and over two years.
    - April 2019 – 50%.
    - Current – 28%.
  - 0 opened over two years.
  - 2 opened between one and two years.
- HIPAA
  - 47% of disclosures are HIPAA disclosures.
  - 79% of HIPAA are impermissible (e.g. misdirected facts).

### 7.2.3. Training – presented by Mark Sprada, VP, Strategy and Clinical Operations

- CIA Education Plan in Review
  - Specific to Corporate Integrity Agreement.
  - CIA YEAR 5 eLearning Module Assignment.
    - General compliance and ethics training and code of conduct.
    - 
    - Human Resource tracks required groups, start/stop dates, and types of training.
  - Finalized CIA Year 5 Completion Report as of June 25,2020.
    - Only 92 employees did not complete training due to FMLA or DL. Training to completed within one week of return to work.
  - CIA Year 5 Specialized Training/Arrangements Training.
    - August 21, 2020 due date.
    - Expect remaining 236 employees (primarily managers) to complete training.
  - Proposed Future Training Opportunities.
    - Billing/Coding Compliance.
      - Set awareness expectations.
    - Physician Focused Training.
      - Implement continuing medical education credit awards.
    - Opportunities Identified by Enterprise Risk Assessment.
      - Training opportunities.

### 7.2.4. Sanction Screening – presented by Barry Gallison, Corporate Director, Risk and Quality

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- Risk Analysis – October through December 2019.
  - Five risk points.
    - Policy screenings.
    - HR agency/temporary staff.
    - Patient prescriptions from a non-credentialed physician provider (e.g. lab work, x-ray).
    - Vendors.
    - Contracts.
  - Data streams.
    - Biggest risk is making the manual process more automated.
    - Submitting a form to the Data Governance Committee to allow for all of these different streams to go from manual to automated for better reporting to our outside screening agency.
    - No risks identified in last four months related to Medicare or Medicaid patients.
    - One risk issue in April for a commercial payor related to the patient access process.
  
- 7.2.5. Auditing/Monitoring/Risk Assessment – presented by Alex Fernandez, CFO
  - ECG meeting: presented high-risk areas identified last year.
  - Audit and Monitoring Committee
    - Presented physician billing/coding practices and internal controls for quality.
    - Presented on cardiac rehabilitation unit and internal controls at BHMC.
  - Risk Assessment
    - Risk Assessment led by Zari Watkins, Executive Director, Corporate Services:
      - Reduced list of questions over last year.
      - Will be more focused on relevant risk, including COVID-19 and social injustice.
    - Removed OIG work plan questions and will audit independently of risk assessment.
    - Time table set.
  - Continue to review open audits for compliance and internal audit. Drafted audit resolution to ensure staff are following up on audit requirements.
  
- 7.2.6. Code of Conduct/Policies – presented by Denise Moore, VP, Corporate Communications and Marketing
  - New Committee Members
    - Gerry del Amo, Deputy General Counsel.
    - Adlyn Tuya, Associate General Counsel.
    - Mark Green, Compliance Manager.

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- All compliance policies will have been reviewed for annual review as required by the CIA.
  - Six policies currently presented at ECG.
    - Fair Market Value and Commercial Reasonableness.
    - Referral Source Contracting Policy.
    - Deficit Reduction Act.
    - Conflict of Interest.
    - Actions and Events Reportable to OIG.
    - Record Retention, Storage and Disposal.
- Compliance Marketing
  - Continue to communicate policy changes through internal digital newsletter.
  - Collaborate with General Counsel's office to evaluate which policies will be presented to the Board for approval.

7.3. Compliance Education – presented by Brian Kozik, SVP, Chief Compliance Officer

Mr. Kozik gave a training on the Principles of Federal Prosecution of Business Organizations and how it relates to the effectiveness and what prosecutors look for in a compliance program.

## 8. ADJOURNMENT

There being no further business on the agenda, the Chair adjourned the meeting at 12:34 p.m.

Respectfully submitted,  
Commissioner Marie C. Waugh, Secretary/Treasurer





**Origination:** 08/2019  
**Effective:** N/A  
**Last Reviewed:** N/A  
**Last Revised:** N/A  
**Next Review:** N/A  
**Sponsor:** *Brian Kozik: SVP, COMPLIANCE & PRIVACY*  
**Section:** *GA-Corporate Compliance*  
**Manuals:**

## GA-004-012 Gifts, Gratuities, and Business Courtesies

### I. Purpose

On occasion, vendors, potential vendors, contractors, patients, or others may offer gifts or gratuities directly or indirectly to Workforce Members of Broward Health. The Federal Anti-Kickback Statute (42 U.S.C. § 1320a-7b(b)) prohibits the offering, paying, soliciting, or receiving of anything of value which may induce or reward (or even appear to induce or reward) referrals to a health care facility receiving federal health care money such as Medicare or Medicaid. These offerings represent a potential for conflicts of interest, or the appearance of such, on part of the Workforce Member and Broward Health. Gifts and gratuities are not part of Broward Health’s operational environment as the acceptance of gifts and gratuities in certain instances may implicate that decision-making is predicated on such offering. As such, the acceptance of such gifts and/or gratuities would constitute a risk to the integrity of Broward Health and its Workforce Members. This policy is intended to provide guidance to the Workforce Member to aid them in complying with Broward Health’s mission and purpose and federal and state laws prohibiting the appearance of impropriety. The examples provided in this policy are not exhaustive as individual situations can differ. If situations arise which are not covered in the examples within this policy, it should be addressed with the workforce member’s immediate supervisor and the Broward Health Corporate Compliance and Ethics Department.

### II. Key Terms

**Cash Equivalents:** Any item that is easily converted to cash such as gift certificates, gift cards, stocks, bonds, treasury bills, certificates of deposit, money market accounts, other marketable securities, negotiable instruments, commercial paper, vouchers, and rebates.

**Gifts:** Anything of value that an individual receives for which the individual has not paid for or performed services. These can include meals, flowers, candy, promotional items, cash equivalents, discounts, travel expenses, lodging expenses, and tickets to events.

**Special Occasion:** The period between Thanksgiving until the New Year. This period also includes celebratory weeks such as Nurse’s Week, Hospital Week, etc.

**Immediate Family Member:** Spouse, birth or adoptive parent, child, sibling, stepparent, stepchild,

stepbrother, stepsister, father-in-law, mother-in-law, son-in-law, daughter-in-law, brother-in-law, sister-in-law, grandparent, grandchild, and spouse of a grandparent or grandchild.

**Nominal Value:** Anything of value not exceeding ten (\$10) dollars.

**Physician:** A Doctor of Medicine or osteopathy, a Doctor of Dental Surgery or dental medicine, a doctor of podiatric medicine, a Doctor of Optometry, or a chiropractor.

**Referral Source:** A physician, a physician's immediate family member, an entity that is controlled by a physician or a physician's immediate family member, or any non-physician who may be capable of making referrals to a Broward Health region or entity.

**Reporting Individual:** Any Workforce Member designated by Broward Health as being required to file a full or limited disclosure of financial interests pursuant to the Florida Code of Ethics.

**Workforce Member:** Any employee, independent contractor, agent, trainee, or other person who performs work for or on behalf of Broward Health. This includes full-time, part-time and pool employees; associates; directors; officers; managers; supervisors; members of the Board and members of standing committees; medical staff employed by or otherwise affiliated with Broward Health; medical students and all other affiliated students or others receiving training at any Broward Health facility; and others who provide goods or services to Broward Health.

### III. Policy

1. Workforce Members of Broward Health shall not solicit, receive, nor shall they allow others to solicit or receive on their behalf, gifts, gratuities, cash, cash equivalents, promotional items, or services from vendors, contractors, patients, physicians, or any other referral source or recipients of referrals from Broward Health except as otherwise permitted in the Gifts and Gratuities Guideline attached to this Policy.
2. Broward Health acknowledges that there are certain circumstances where a patient or a patient's family will give gifts of nominal value such as candy or flowers to Workforce Members as a modest token of appreciation during the course of a patient-caregiver relationship or during a Special Occasion. Workforce Members should, whenever practical, politely decline these gifts and inform the patient or the patient's family about the Broward Health Foundation and its programs. However, gifts of nominal value may be received as modest tokens of appreciation during the patient-caregiver relationship or during special occasions from patients and/or their family members provided they are not cash or cash equivalents; they are not intended to induce or reward referrals; the purchase of goods, or services; do not exceed ten dollars (\$10) in value; refusing the gift could compromise the employee-patient relationship; and the gifts are reported to the Workforce Member's immediate supervisor. In no circumstances can the aggregate value of gifts that a Workforce Member accepts exceed one hundred dollars (\$100) per calendar year. If any gift exceeds the amounts indicated above, the Workforce Member and/or Workforce Member's supervisor will report the occurrence to the Corporate Compliance and Ethics Department for further review.
3. Gifts received by Departments of Broward Health from patients, vendors, and contractors that are modest, infrequent, shareable amongst the Department, and perishable as tokens of appreciation or during a Special Occasion are permitted provided they are not cash or cash equivalents; they are not intended to induce or reward referrals; the purchase of goods or services, and the gifts are reported

to and approved by the Broward Health Corporate Compliance and Ethics Department.

4. Reporting Individuals and their spouses and minor children may not accept gifts of any kind value, regardless of how small, from Florida lobbyists or vendors seeking to influence, obtain, or maintain Broward Health contracts, business or procurement of services or goods. This policy does not provide guidance as to the Reporting Individual's responsibility to determine what is reportable under The Code of Ethics for Public Officers and Employees found in Chapter 112 (Part III) of the Florida Statutes ("Florida Code of Ethics"). Nothing reported to the Corporate Compliance and Ethics Department pursuant to this policy exempts a Reporting Individual from their reporting requirements under the Florida Code of Ethics.
5. Exceptions to this Policy are rare and are allowed only if they are granted by both the respective facility's CEO and the Chief Compliance Officer.

#### **IV. Related Policies and Compliance Documents**

- Broward Health Code of Conduct
- Broward Health Board of Commissioners Codified Resolution Section 2.7
- GA-001-015 Conflict of Interest
- GA-004-405 Business Courtesies to Physicians and Immediate Family Members

#### **V. References**

The Code of Ethics for Public Officers and Employees found in Chapter 112 (Part III) of the Florida Statutes

42 U.S.C. § 1320a-7b

#### **VI. Administration and Interpretation**

The administration and interpretation of this policy is the responsibility of the Senior Vice President, Chief Compliance/Privacy Officer.

## **Attachments**

[Gifts, Gratuities, and Business Courtesies Guideline](#)

Gifts and Gratuities  
Matrix

Definitions:

Gifts: Anything of value that an individual receives for which the individual has not paid for or performed services. These can include meals, flowers, candy, promotional items, cash equivalents, discounts, travel expenses, lodging expenses, and tickets to events.

Nominal Value: A monetary value assigned to gifts, not to exceed \$10 per occurrence or exceeds \$100 in the aggregate<sup>1</sup> for the current calendar year. For purposes of these guidelines, employees and physicians may use their best judgment to assign a reasonable estimated value to the gifts.

Type	Summary
General	<p>Generally, employees and independent physicians performing services at a Broward Health facility are prohibited from soliciting, accepting, or providing gifts. Gifts should never be accepted if they are intended to influence the individual in taking an action, deciding, or to reward the individual for work done at Broward Health.</p> <p>Items provided to physicians are governed by Broward Health’s Non-Monetary Compensation to Physicians and Immediate Family Members Policy and CMS Requirements.</p> <p>Acceptance of cash or cash equivalents (e.g. gift cards) by any Broward Health workforce members from patients, families, and vendors is never acceptable.</p>
Solicitation of Gifts	<p>It is inappropriate for Broward Health employees or physicians to solicit items for personal or departmental use. This includes, but is not limited to, gifts, payments, or loans from a vendor, physician, or physician group, patient, patient’s family, or any other individual or entity doing business with Broward Health.</p>

<sup>1</sup> Policy GA-004-012 “Gifts, Gratuities, and Business Courtesies” - This policy and matrix do not apply to the provision of gifts, goods, free items or services to Broward Health patients or potential patients of Broward Health.

	<p>Soliciting gifts from vendors or individuals affiliated with the entity, including physicians, for the purpose of holding a department party or celebration week is not permitted. Inquiries from vendors and physicians regarding departmental parties or celebration weeks shall be referred to the entity CEO in conjunction with the Corporate Compliance and Ethics Department.</p>
<p>Gifts from Vendors</p>	<p>It is inappropriate for Broward Health or any of its employees and physicians performing services at a Broward Health facility to request or receive goods and/or services from any vendor for personal use or enjoyment. It is inappropriate for Broward Health or any of its employees and physicians to accept gifts intended to influence a particular action or decision. No vendor may offer gifts, monies, or business services to Broward Health employees or physicians that could violate Federal Anti-Kickback statutes.</p>
<p>Conferences, Seminars and Educational Events</p>	<p>Payments by vendors for conferences and seminars for the purpose of Broward Health employee attendance are not permitted. If attendance is required at a conference, seminar, or user group, payment shall be made by the respective Broward Health operating entity.</p> <p>Specific agreements and contracts may, by their terms, include education and training seminars. In those instances, payment by vendors may be acceptable and governed by the terms of the agreement. Education and training seminars that are governed by the terms of a vendor agreement will be reviewed by the facility's Chief Executive Officer ("CEO") or the Department Head for approval, in consultation with the Corporate Compliance and Ethics Department as required.</p> <p>Broward Health policy GA-001-095 Travel (Commissioners, Employees, and Other Authorized) dictates the specific requirements for Broward Health to reimburse and/or sponsor travel.</p>
<p>Gifts Exchanged pursuant to Personal Friendships</p>	<p>An employee who has become friends with an individual who is another employee of Broward Health, or who has a business relationship with Broward Health, and engages in the practice of exchanging gifts with that individual may do so without any limits, provided that the employee does not include the gift as a business expense for tax purposes and does not charge Broward Health or otherwise receive reimbursement from Broward Health to cover this expense.</p>

<p>Non-Broward Health Events</p>	<p>Broward Health recognizes that attendance at non-Broward Health events, such as golf outings and galas, may serve a beneficial business purpose. However, because the value associated with these events is not nominal, payment by vendors is not permitted. If attendance at such events is deemed warranted by the workforce member’s facility CEO or Department Head payment shall be made by the respective Broward Health operating cost center.</p>
<p>Business Meals and Entertainment</p>	<p>Business meals include reasonable amounts spent on food and other refreshments purchased in surroundings conducive to and including a business discussion with vendors, customers, or other clients. Reimbursement for business meals is outlined in Broward Health policy GA-004-095 Travel (Commissioners, Employees, and Others Authorized).</p> <p>Business entertainment includes the cost of transportation reasonably related to Broward Health business as outlined in GA-001-095 Travel (Commissioners, Employees, and Other Authorized).</p> <p>Broward Health will reimburse meal or entertainment expenses only if the meal or entertainment will directly benefit Broward Health, or if it directly precedes or follows a substantial and bona fide business discussion for the purposes of obtaining a business benefit to Broward Health.</p> <p>Entertainment expenses not designated as meals require additional evaluation on the travel expense report. The expense reporting will include dates, names of the individuals, titles, and companies, as well as the business purposes. The most senior Broward Health employee present should pay all the business entertainment expenses.</p> <p>Employees should always use their judgment and common sense when charging business meals and entertainment.</p>
<p>Charitable Gifts from Vendors/Industry</p>	<p>Any charitable gift provided by vendors/industry needs to be governed and overseen by the Broward Health Foundation or other areas approved by Broward Health to receive charitable gifts from vendors/industry (e.g. Children’s Diagnostic and Treatment Center (CDTC) and Child Life) to ensure that such support does not introduce an actual or perceived conflict of interest.</p>
<p>Donations</p>	<p>The receipt of donations is governed by Broward Health Foundation policies and procedures or other areas (e.g., CDTC and Child Life) approved by Broward Health to receive donations or donated goods.</p>