

North Broward Hospital District Board of Commissioners  
1601 South Andrews Avenue, Suite 100, Fort Lauderdale, FL 33316

**COMPLIANCE AND ETHICS COMMITTEE MEETING**  
**Immediately following the Audit Committee Meeting**  
**Wednesday, April 24, 2024**

The Compliance and Ethics Committee Meeting of the North Broward Hospital District was held at the Broward Health Sports Medicine Building, 1601 South Andrews Avenue, Suite 100, Fort Lauderdale, FL 33316.

1. **NOTICE OF MEETING**

2. **CALL TO ORDER**

There being a quorum present, the meeting was called to order by Chair Nancy W. Stamper at 2:14 p.m.

3. **COMMITTEE MEMBERS**

*Present:*

Commissioner Paul C. Tanner  
Commissioner Christopher J. Pernicano  
Commissioner Jonathan K. Hage  
Commissioner Stacy L. Angier  
Commissioner Ray T. Berry, Vice Chair  
Commissioner Nancy W. Stamper, Chair

*Senior Leadership*

*Additionally Present:*

Shane Strum, President, Chief Executive Officer  
Alan Whaley, EVP, Chief Operating Officer  
Alisa Bert, VP, Interim Chief Financial Officer  
Linda Epstein, Corporate General Counsel

4. **PUBLIC COMMENTS**

Chair Stamper opened the floor for public comments, in which there were none.

5. **APPROVAL OF MINUTES**

5.1. Approve Meeting Minutes dated January 31, 2024

Without objection, Chair Stamper approved the minutes, dated January 31, 2024

Motion *carried* without dissent.

6. **TOPIC OF DISCUSSION**

6.1. Recent Enforcement Actions (Presenter – Christopher Martin, Regional Compliance Officer, Broward Health North)

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Mr. Martin discussed and focused on enforcement actions related to Academic Medical Centers and understanding the risks moving forward.

- 6.2. OIG – General Compliance Program Guidance (“GCPG”) Overview – Nov. ’23  
(Presenter – Christopher Martin, Regional Compliance Officer, Broward Health North)

Mr. Martin shared key sections of the General Compliance Program Guidance, November 2023:

- Health Care Fraud Enforcement and Other Standards
- Compliance Program Infrastructure
- Compliance Program Adaptations for Small and Large Entities
- Other Compliance Considerations

- 6.3. Privacy Report (Presenter – Gabriella Roblejo, Executive Director, Privacy Operations)

Ms. Roblejo reported on the Privacy Program Highlights & Opportunities for Improvement:

- Privacy Investigations:
  - Successfully and efficiently investigate numerous privacy incidents and complaints and provide timely breach notification as required.
  - Moving forward, aim to streamline investigations and shorten investigation timeframes
- HIPAA Training
  - Providing privacy training at new employee orientation, during annual mandatories, and ad hoc as needed in response to privacy incidents.
  - Moving forward, aim to provide more proactive training in the hope of reducing privacy incidents.
- Look to implement privacy walkthroughs through the different regions
- Enhance auditing and monitoring

For further detail, related slides are available within the April 2024 Compliance and Ethics Committee Meeting book on the Board of Commissioners’ web page.

## 7. **ADJOURNMENT**

There being no further business on the agenda, the Chair adjourned the meeting at 2:26 p.m.

Respectfully submitted,  
Commissioner Jonathan K. Hage, Secretary/Treasurer