

Compliance and Ethics Committee

Compliance and Privacy Report

Judy Ringholz, Chief Compliance Officer

Christopher Martin, System Executive Director, Compliance

Gabriella Roblejo, Executive Director, Privacy Operations

January 29, 2025



Agenda

01 New Initiatives

02 Compliance Program Review

03 OIG Work Plan and Enforcements

04 Privacy Report

05 Compliance Training

01 | New Initiatives

HCP Pro Partnership

- Regulatory awareness – Propel Medicare Watchdog Report
- Training
 - Medicare Bootcamp – Hospital Billing
 - Web Based Learning library
 - Utilization Review
 - Revenue Integrity
 - Coding for Non-Coders
 - Case Management

MD Audit – Professional Fees

- Data analytics tool:
 - Risk monitoring
 - Compliance and revenue risk identification
- Auditing tool
 - Retrospective workflows
 - Reporting
- Denial management
- Physician performance reporting
- Focused education delivery

Annual Conflict of Interest Form

- Symplr software enabled
- Simplified form
- Data analytics to highlight risk
- Focused efforts to manage risk

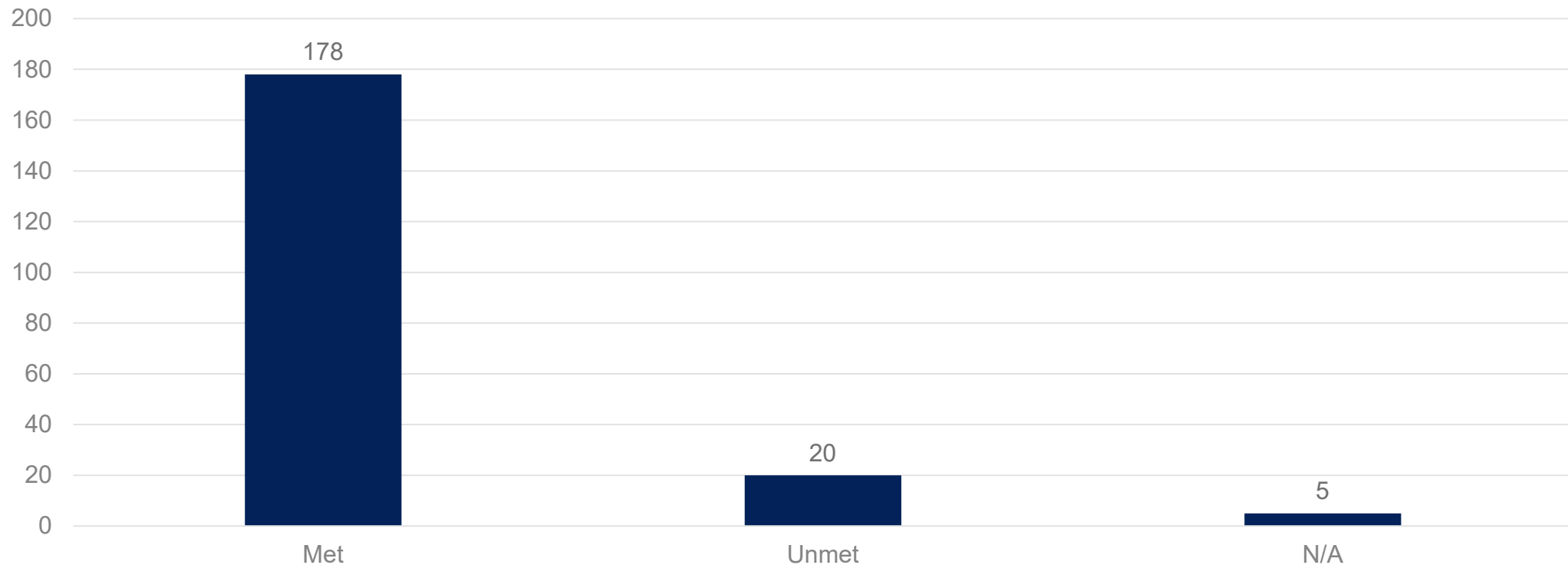
New Employee Orientation

- Partnership with Lauren Oats, AVP Learning and Development
- Risk based approach
 - Shift focus to 65% Privacy and 35% Compliance
- Adult learners focused
 - Moving away from text heavy slides
 - Moving toward scenario based and interactive discussions

02 | Compliance Program Review

OIG's General Compliance Program Guidance

- Identified 270 statements in this document that include the term "should". Evaluated 100% of the statements. BH currently has processes/controls in place to address 90% of the recommendations.



03 | OIG Workplan and Enforcements

OIG Workplan Updates

Workplan Item Title	Risk Rating
Audit of Medicare Claim Lines for Which Payments Exceeded Charges	Low
Audit of Medicare Part D Over-the-Counter Drugs	Low

OIG Enforcement Activities

Enforcement	Risk Rating
\$7.6 Million from Health Insurer for using banned medicaid provider	Low
Walgreens pays \$106.8 million for undispensed medications	Low
\$240,000 Civil Monetary Penalty against provider for HIPAA ransomware cybersecurity investigation	Low

04 | Privacy Report

Actions to Comply with HIPAA Privacy Rule



Collaborated with ROI vendor and HIM Department to discuss revised workflows



Created required attestation



Revised policies



Provided trainings to relevant departments

Privacy Field Accomplishments

Training

- Annie Weaver
- Lauderdale Lakes
- Margate
- Pompano Pediatrics
- Comprehensive Care Center/
Bernard Alicki/ Specialty
- Cora E. Braynon

Walkthroughs

- Weston
- Bernard Alicki
- Specialty Care Center
- Comprehensive Care Center

05 | Compliance Training

The Board's Responsibility Related to Quality of Care

***Ethical behavior is doing the right thing
when no one else is watching.***

[Aldo Leopold]