

FY2021-2022
 Compliance Work Plan
 Board Approved 9/9/2020

Topic	Region	Lead Auditor:	Expected Completion Date (FY)	Actual Completion Date	Status	Results
Business Associate Agreement ("BAA") <i>(1/1/2017 through 12/31/2019)</i> Review a sample of 50 arrangements in the Contracts Management System ("C360") to determine whether internal controls are in place to regulate if a BAA is required at the initiation of a contractual relationship, and when required, it is clearly indicated by the internal stakeholder, and a BAA has been fully executed.	System-Wide	Leslie Hernandez Sophie Ulysse Camila Daza	FY21		Complete	
CARES Act (Coding & Billing) Review a selection of encounters from each facility to validate the audit completed by Health Information Management ("HIM") to determine if medical record documentation supported the assignment of ICD-10-CM diagnosis code U07.1 COVID-19 and if Corporate Compliance agreed with the HIM findings. Additionally, Corporate Compliance will review the UB-04 for each of the encounters in the validation audit to determine if the claims were billed appropriately.	System-Wide	Ember Howell-Lopez	FY21		Complete	HIM is looking at 25 claims from 3/1-8/31/2020 all documentation r/t covid. New code U07.1 lab test added in Sept. Will review in Feb.
Clinical Trials: Institutional Review Board ("IRB") A retrospective review of IRB policies and procedures to determine if Broward Health Policies and procedures, CFR, FDA, and CMS requirements are being met.	System-Wide	Ember Howell-Lopez Mark Green Sophie Ulysse	FY21		Complete	

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Coding Audits FY20-Q2 <i>(Oct. 1, 2019 - Dec. 31, 2019)</i> Conduct a biannual coding accuracy audit of 30 randomly selected medical records for each hospital based IP and OP coder at BHIP. The biannual coding audits will assess coders compliance with Official Coding Guidelines and coding industry standards ≥ 95% accuracy rate.	BHIP	Odalys Martinez	FY21	11/30/2020	Complete	IP coding accuracy: 99.80% OP coding accuracy: 99.59% MS-DRG and APR-DRG: 100% APC assignments accuracy: 100%. POC Status: N/A
Coding Audits FY20-Q2 <i>(Oct. 1, 2019 - Dec 31, 2019)</i> Conduct a biannual coding accuracy audit of 30 randomly selected medical records for each hospital based IP and OP coder at BHMC. The biannual coding audits will assess coders compliance with Official Coding Guidelines and coding industry standards ≥ 95% accuracy rate.	BHMC	Odalys Martinez	FY21		Complete	
Coding Audits FY20-Q4 <i>(April 1, 2020 - June 30, 2020)</i> Conduct a biannual coding accuracy audit of 30 randomly selected medical records for each hospital based IP and OP coder at BHIP. The biannual coding audits will assess coders compliance with Official Coding Guidelines and coding industry standards ≥ 95% accuracy rate.	BHIP	Odalys Martinez Linda Lopez	FY21		Complete	
Focus Arrangements CIA YR5 - Q2 <i>(Dec. 1, 2019 - Feb. 1, 2020)</i> A review of the Focus Arrangements Tracking System, internal review and approval process, and other Focus Arrangements Procedures on at least an annual basis and to provide a report on the results of such review to the Compliance Committee.	System-Wide	Eloisa Gomez Lucia Pizano-Urbina	FY21	10/19/2020	Complete	Overall error rate: 2.1% Payback amount: \$0 POC Status: Complete
Focus Arrangements CIA YR5-Q3 & Q4 <i>(March 1, 2020 - August 31, 2020)</i> A review of the Focus Arrangements Tracking System, internal review and approval process, and other Focus Arrangements Procedures on at least an annual basis and to provide a report on the results of such review to the Compliance Committee.	System-Wide	Eloisa Gomez Camila Daza Henry Ortiz	FY21	1/27/2021	Complete	Overall error rate: <1% Payback amount: \$0 POC Status: N/A

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Inpatient Mechanical Ventilation <i>(October 1, 2020 - March 31, 2021)</i> A review of inpatient Medicare encounters was completed to determine if medical record documentation supported the applied MS-DRG and if the encounter was billed accurately. A review of the Uniform Billing form ("UB-04") was also completed to determine if the encounter was billed in accordance with Medicare billing requirements.	System-Wide	Ember Howell-Lopez	FY21		Complete	
Non-Focus Arrangements <i>(Nov. 1, 2019 - Jan. 31, 2020)</i> Review a sample of Non-Focus Arrangement contracts to verify that the internal review and approval process is working as intended.	System-Wide	Linda Lopez Eloisa Gomez	FY21	9/8/2020	Complete	Overall error rate: <1% Payback amount: \$0 POC Status: N/A

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Observation <i>(Jan. 1, 2019 - March 31, 2019)</i> Review a sample of medical records, from BHN, to evaluate BHN's process with respect to CMS requirements for Medicare Outpatient Observation.	BHN	Lilian Eymann Ember Howell-Lopez	FY21	9/1/2020	Complete	Overall error rate: 22% •Observation services-0% •MOON-22% •IMM-66% •CC44-0% Payback Amount:\$0 POC: Complete

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Referral Source Arrangements & Tracking Remuneration <i>(July 1, 2020 - Dec. 31, 2020)</i> A bi-annual review of 50 referral source arrangements from the contract management system to verify all internal review and approval processes, and other referral source procedures were followed.	System-Wide	Eloisa Gomez Henry Ortiz Linda Lopez	FY21		Complete	
Release of Protected Health Information ("PHI") <i>(Date: TBD)</i> Review 30 medical record releases from each facility to ensure the release has been done within the 30 days required by the Privacy Rule and our Release of PHI policy.	System-Wide	Leslie Hernandez Sophie Ulysse Camila Daza	FY21		Complete	
Stroke Patient Coding <i>(Jan. 01, 2019 - Dec. 31, 2019) (Special Request)</i> A review of patients who underwent a Mechanical Thrombectomy ("Coiling") or received IV-tPA to determine coding accuracy and consistency.	System-Wide	Odalys Martinez	FY21		Complete	
Tracking Remuneration - Employed Physician Agreements <i>(Oct. 1, 2019 – Dec. 31, 2019)</i> A review of 30 randomly selected employed physician agreements from Compliance 360 to verify if the internal controls are in place for tracking remuneration related to employed physician agreements and if they are effective and working as designed.	System-Wide	Henry Ortiz Camila Daza	FY21		Complete	
Tracking Remuneration: Community Care Partners ("CCP") <i>(Date: TBD)</i> A review of 30 randomly selected fee-for-service agreements from Compliance 360 to verify if the internal controls are in place for tracking remuneration related fee-for-service arrangements and if they are effective and working as designed.	System-Wide	Camila Daza Henry Ortiz	FY21		Complete	
Two Midnight Rule probe audit <i>(Oct.1-Dec. 31, 2018)(OIG requested Lookback)</i> Review a sample of Medicare claims from each facility, including the review of all relevant documentation, to validate appropriateness of admission based on the two-midnight rule.	System-Wide	Ember Howell-Lopez BNN	FY21	10/14/2020	Complete	Overall error rate: 9.8% Payback amount: \$159,652.00 (Initial review) + \$117,855.54 (remaining enc.) \$277,710.54 (pending all refund postings) 12/09/2020
Coding Audits FY20-Q3 (COVID-19) <i>(Jan. 1, 2020 - March 31, 2020)</i> Conduct a biannual coding accuracy audit of 30 randomly selected medical records for each hospital based IP and OP coder at BHCS. The biannual coding audits will assess coders compliance with Official Coding Guidelines and coding industry standards ≥ 95% accuracy rate.	BHCS	Odalys Martinez Linda Lopez	FY21		Complete	

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Coding Audits FY20-Q3 (COVID-19) <i>(Jan. 1, 2020 - March 31, 2020)</i> Conduct a biannual coding accuracy audit of 30 randomly selected medical records for each hospital based IP and OP coder at BHN. The biannual coding audits will assess coders compliance with Official Coding Guidelines and coding industry standards ≥ 95% accuracy rate.	BHN	Odalys Martinez Linda Lopez	FY21		Complete	
Coding Audits FY20-Q4 <i>(April 1, 2020 - June 30, 2020)</i> Conduct a biannual coding accuracy audit of 30 randomly selected medical records for each hospital based IP and OP coder at BHMC. The biannual coding audits will assess coders compliance with Official Coding Guidelines and coding industry standards ≥ 95% accuracy rate.	BHMC	Odalys Martinez Linda Lopez	FY21		In Process	
Coding Audits FY21-Q1 <i>(July 1, 2020 - Sept. 30, 2020)</i> Conduct a biannual coding accuracy audit of randomly selected medical records for each hospital based IP and OP coder at BHCS. The biannual coding audits will assess coders compliance with Official Coding Guidelines and coding industry standards.	BHCS	Odalys Martinez	FY22		In Process	
Coding Audits FY21-Q1 <i>(July 1, 2020 - Sept. 30, 2020)</i> Conduct a biannual coding accuracy audit of randomly selected medical records for each hospital based IP and OP coder at BHN. The biannual coding audits will assess coders compliance with Official Coding Guidelines and coding industry standards.	BHN	Odalys Martinez	FY22		In Process	

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Covered Persons Screening <i>(Date: January 1, 2020 – March 31, 2020)</i> A review of randomly selected arrangements from Compliance 360 that have a covered person designation to ensure contractors are completing exclusion screenings on their employees, as agreed upon in the executed arrangement.	System-Wide	Camila Daza-Siegel	FY22		In Process	
EMTALA Conduct a review of current processes in the emergency department and other areas as it relates to EMTALA and regulatory requirements.	BHMC	Camila Daza-Siegel	FY22		In Process	
Referral Source Arrangements & Tracking Remuneration <i>(Jan. 1, 2021 - June 30, 2021)</i> A bi-annual review of referral source arrangements from the contract management system to verify all internal review and approval processes, and other referral source procedures were followed.	System-Wide	Eloisa Gomez	FY22		In Process	
Tracking Remuneration: Grants <i>(Jan. 1, 2021 - June 30, 2021)</i> A review of randomly selected grants from the contract management system to verify if the internal controls for tracking remuneration related to grants are effective and working as designed.	Ambulatory	Alex Escorcia	FY22		NEW	
Physician Compensation <i>(July 1, 2020 - June 30, 2021)</i> A review of physicians that have multiple arrangements in the Contract Management System to verify the aggregate compensation across the arrangements are within fair market value and commercially reasonable.	System-Wide	Eloisa Gomez	FY22		NEW	

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Hospital General Consent Form Completion <i>(July 1, 2021 - December 31, 2021)</i> Hospitals are required to have patients sign a general consent form at the time of registration or before discharge. A review of encounters will be completed to verify compliance with 45 CFR §164.508.	System-Wide	Leslie Hernandez	FY22		NEW	
Infusion Therapy <i>(July 1, 2020 - June 30, 2021)</i> Infusion therapy is the administration of fluids and medication through an intravenous injection. Corporate Compliance will conduct a review of a random sample of medical records/claims of patients who received infusion therapy in the Emergency Department to determine compliance with documenting infusion therapy.	System-Wide	Linda Lopez	FY22		NEW	
EMTALA Conduct a review of current processes in the emergency department and other areas as it relates to EMTALA and regulatory requirements.	BHN	Camila Daza-Siegel	FY22		Pending	
EMTALA Conduct a review of current processes in the emergency department and other areas as it relates to EMTALA and regulatory requirements.	BHIP	Camila Daza-Siegel	FY22		Pending	
EMTALA Conduct a review of current processes in the emergency department and other areas as it relates to EMTALA and regulatory requirements.	BHCS	Camila Daza-Siegel	FY22		Pending	

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Clinical Trials Audit: Research Institute <i>(Date: July 1, 2020 - June 30, 2021)</i> Review a percentage of patient clinical trial files of current clinical trials to determine if each patient file contains the required information for the protocol (i.e. consents).	System-Wide	Ember Howell-Lopez	FY22		Pending	
Coding Audits FY21-Q2 <i>(Oct 1, 2020 - Dec. 31, 2020)</i> Conduct a biannual coding accuracy audit of randomly selected medical records for each hospital based IP and OP coder at BHN. The biannual coding audits will assess coders compliance with Official Coding Guidelines and coding industry standards.	BHMC	Odalys Martinez	FY22		Pending	
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Coding Audits FY21-Q3 <i>(Jan. 1, 2021 - March 31, 2021)</i> Conduct a biannual coding accuracy audit of randomly selected medical records for each hospital based IP and OP coder at BHN. The biannual coding audits will assess coders compliance with Official Coding Guidelines and coding industry standards.	BHN	Odalys Martinez	FY22		Pending	

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Coding Audits FY21-Q4 <i>(April 1, 2021 - June 30, 2021)</i> Conduct a biannual coding accuracy audit of randomly selected medical records for each hospital based IP and OP coder at BHIP. The biannual coding audits will assess coders compliance with Official Coding Guidelines and coding industry standards.	BHIP	Odalys Martinez	FY22		Pending	
Coding Audits FY21-Q4 <i>(April 1, 2021 - June 30, 2021)</i> Conduct a biannual coding accuracy audit of randomly selected medical records for each hospital based IP and OP coder at BHMC. The biannual coding audits will assess coders compliance with Official Coding Guidelines and coding industry standards.	BHMC	Odalys Martinez	FY22		Pending	
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Standard Operating Procedure - Adding and removing practitioners from Hospital-Based and Early Steps Arrangements <i>(July 1, 2021 - December 31, 2021)</i> New Standard Operating Procedure ("SOP") for Adding/Removing Practitioners from Hospital-Based and Early Steps Arrangements was implemented 03/16/2020. The SOP established a process that Broward Health Hospitals and Children's Diagnostic and Treatment Center ("CDTC") must follow to add and remove practitioners without entering into an amendment to the arrangement. This process is only applicable to these two types of arrangements. Corporate Compliance will audit a random sample of arrangements to verified requirements of the SOP are met.	System-Wide	Eloisa Gomez	FY22		Pending	
Tracking Remuneration: Medical Directorship Audit <i>(Jan. 1, 2021 - June 30, 2021)</i> A review of randomly selected medical director timesheets from ServiceNow to verify if the internal controls for tracking remuneration related to medical directorship arrangements are effective and working as designed.	System-Wide	Eloisa Gomez	FY22		Pending	

Key
Audit in Process
Audit is a carryover from the previous year's Work Plan
New
No fill: Audit is pending

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