



**Quality, Patient Safety & Compliance Committee  
Meeting Agenda  
September 25, 2018  
10:00 A.M.**

**Meeting Location  
1515 N. Flagler Dr., Ste. 101  
West Palm Beach, FL 33401**



**QUALITY, PATIENT SAFETY AND COMPLIANCE COMMITTEE  
AGENDA**

**September 25, 2018 at 10:00 a.m.  
1515 N. Flagler Dr., Suite 100  
West Palm Beach, FL 33401**

- 1. Call to Order – Dr. Alina Alonso, Chair**
  - A. Roll Call
- 2. Agenda Approval**
  - A. Additions/Deletions/Substitutions
  - B. Motion to Approve Agenda
- 3. Awards, Introductions and Presentations**
  - A. Fiscal Year 2018 Health Center Quality Improvement Award.  
(Belma Andric)
  - B. Lakeside Medical Center Emergency Department Update.  
(Dr. Scheppke)
- 4. Disclosure of Voting Conflict**
- 5. Public Comment**
- 6. Meeting Minutes**
  - A. **Staff recommends a MOTION TO APPROVE:**  
Committee Meeting Minutes from May 22, 2018. [Pages 1-6]
- 7. Consent Agenda- Motion to Approve Consent Agenda Items**
  - A. **ADMINISTRATION**
    - 7A-1 **RECEIVE AND FILE:**  
Internet Posting of District Public Meeting.  
<http://www.hcdpbc.org-Resources-Public Meetings>
    - 7A-2 **RECEIVE AND FILE:**  
Committee Attendance.  
[Page 7]
    - 7A-3 **RECEIVE AND FILE:**  
Compliance and Privacy Dashboard.  
(Ellen Pentland) [Pages 8-13]

**8. Regular Agenda**

**A. ADMINISTRATION**

**8A-1 Staff recommends a MOTION TO APPROVE:**

Amendment to the Quality, Patient Safety and Compliance Committee Charter.  
(Ellen Pentland) [Page 14-23]

**8A-2 Staff recommends a MOTION TO APPROVE:**

Annual Evaluation – Chief Compliance and Privacy Officer.  
(Darcy Davis) [Page 24-27]

**B. CORPORATE QUALITY & PATIENT SAFETY DASHBOARDS**

**8B-1 RECEIVE AND FILE:**

- Patient Relations Dashboard, School Health.  
(Belma Andric/Ginny Keller) [Pages 28-30]
- Patient Relations Dashboard, Primary Care Clinics.  
(Belma Andric/Noelle Stewart, M.D.) [Pages 31]
- Patient Relations Dashboard, Healey Center.  
(Belma Andric/Terretha Smith) [Pages 32-33]
- Patient Relations Dashboard, Lakeside Medical Center.  
(Belma Andric/Janet Moreland) [Pages 34-35]

**8B-2 RECEIVE AND FILE:**

- Quality & Patient Safety Report, School Health.  
(Belma Andric/Ginny Keller) [Page 36-38]
- Quality & Patient Safety Report, Aeromedical.  
(Belma Andric/Gerry Pagano) [Page 39]
- Quality & Patient Safety Report, Primary Care Clinics.  
(Belma Andric/Noelle Stewart, M.D.) [Page 40-43]
- Quality & Patient Safety Report, Healey Center.  
(Belma Andric/Terretha Smith) [Page 44]
- Quality & Patient Safety Report, Lakeside Medical Center.  
(Belma Andric/Janet Moreland) [Pages 45-47]
- Quality and Patient Safety Report, Pharmacy.  
(Belma Andric/Hyla Fritsch) [Page 48]

- Quality & Patient Safety Report, Trauma Program.  
(Belma Andric/Sandra Smith) [Pages 49]

C. **COMPLIANCE**

8C-1 **RECEIVE AND FILE:**

Summary of Compliance and Privacy Activities.  
(Ellen Pentland) [Pages 50-54]

8C-2 **Staff recommends a MOTION TO APPROVE:**

Revised Compliance Work Plan 2018.  
(Ellen Pentland) [Pages 55-61]

D. **CORPORATE RISK MANAGEMENT CLOSED MEETING**  
[Under Separate Cover]

9. **CEO Comments**

10. **Committee Member Comments**

11. **Establishment of Upcoming Meetings**

- November 27, 2018

12. **Motion to Adjourn**





**QUALITY, PATIENT SAFETY AND COMPLIANCE COMMITTEE  
SUMMARY MEETING MINUTES  
May 22, 2018, 10:00 a.m.  
1515 N. Flagler Drive  
West Palm Beach, FL 33401**

**1. Call to Order**

Dr. Alonso called the meeting to order at 10:15 a.m.

**A. Roll Call**

Committee Members present included: James Elder, Sean O'Bannon, Dianne King, Mary Weeks, and Dr. Alina Alonso.

Staff present included: Darcy Davis, Valerie Shahriari, Dr. Belma Andric and Ellen Pentland.

Recording/Transcribing Secretary: Sandra Jaime.

**2. Agenda Approval**

**A. Additions/Deletions/Substitutions**

None.

**B. Motion to Approve Agenda**

**CONCLUSION/ACTION: Sean O'Bannon made a motion to approve the agenda as presented/amended. The motion was duly seconded by Mary Weeks. There being no opposition, the motion passed unanimously.**

**3. Awards, Introductions and Presentations**

**A. None.**

**4. Disclosure of Voting Conflict**

None.

**5. Public Comment**

None.

**6. Meeting Minutes**

**A. Staff Recommends a MOTION TO APPROVE:  
Committee Meeting Minutes from March 27, 2018.**

**CONCLUSION/ACTION:** James Elder made a motion to approve the committee meeting minutes from March 27, 2018 as presented. The motion was duly seconded by Dianne King. There being no opposition, the motion passed unanimously.

**7. Consent Agenda – Motion to Approve Consent Agenda Items**

**CONCLUSION/ACTION:** Mary Weeks made a motion to approve the Consent Agenda items. The motion was duly seconded by Sean O'Bannon. There being no opposition, the motion passed unanimously.

**A. ADMINISTRATION**

7A-1 **RECEIVE AND FILE:**  
May 22, 2018 Internet Posting of District Public Meeting  
<http://www.hcdpbc.org-Resources-Public Meetings>

7A-2 **RECEIVE AND FILE:**  
Committee Attendance

7A-3 **RECEIVE AND FILE:**  
Compliance Privacy Dashboard

**8. Regular Agenda**

**A. ADMINISTRATION**

8A-1 **Staff recommends a MOTION TO APPROVE:**  
Health Care District Committee Charter Update.  
(Valerie Shahriari)

Valerie Shahriari presented the updates to the committee which will provide a consistency and Glades representation on sub-committees and cross over to the Clinics Board. She noted that this will also be applied to the Finance and Audit Committee Charter and will be taken to their meeting today. Mary Weeks asked about the credentialing section of charter and what role the committee plays in this process as she has not seen any credentialing come before this committee. Dr. Andric stated that the Health Care District Board has the final approval and decision after being reviewed by the Medical Executive Committee. Mary asked if conducting this annually was enough. Valerie Shahriari stated that this committee will review Greeley's update and ongoing quality process. She explained that this committee monitors quality, however the committee can recommend additions to the process and have the opportunity to offer suggestions. Valerie also mentioned that Greeley has a multi-year plan for implementation and that future reports will be shared and discussed with the committee for process review from a quality standpoint.

**CONCLUSION/ACTION:** Mary Weeks made a motion to approve the Charter update. The motion was duly seconded by Sean O'Bannon. There being no opposition, the motion passed unanimously.

**B. CORPORATE QUALITY & PATIENT SAFETY DASHBOARDS**

**8B-1 RECEIVE AND FILE:**

- Patient Relations Dashboard, School Health

The committee had no questions or comments on this dashboard.

- Patient Relations Dashboard, Primary Care Clinics

Dr. Alonso noted that she appreciated the total number of patients represented being noted this meeting, as previously requested. Dr. Alonso also applauded the Clinics for their compliments outweighing their complaints. There were no other questions or comments from the committee.

- Patient Relations Dashboard, Healey Center

The committee had no questions or comments on this dashboard.

- Patient Relations Dashboard, Lakeside Medical Center

It was noted that under Summary of Top Complaint/Grievance Categories, that the environmental complaint should have read "paint in the ED" and not pain. There were no additional questions or comments on this dashboard.

**CONCLUSION/ACTION:** Received and filed.

**8B-2 RECEIVE AND FILE:**

- Quality & Patient Safety Report, School Health

Dr. Alonso congratulated Ginny Keller on all metrics being in the Green. There were no additional questions or comments from the committee on this dashboard.

- Quality & Patient Safety Report, Aeromedical

Dr. Alonso commented on hours utilized and asked if we could be criticized for not utilizing the helicopter enough. Dr. Andric stated that there is not a standard national number and that we do utilize dual transport or simultaneous flights. Dr. Andric also stated that the District is considering stationing a helicopter at Lakeside to more readily available and the data supports this decision. Mary Weeks added that she is surprised there is a significant need in the Belle Glade area. Gerry Pagano stated that we want to lower the response and transport time. Dr. Kenneth Scheppeke supported this by saying we would be addressing

both needs in the areas of critical transport and a higher level of care by "bringing the ED, as well as a lifesaving component to the patient". Dr. Alonso asked for details on canceled and aborted flights. Gerry explained that referring agencies cancel when it is determined that the case does not warrant a trauma alert among other reasons and canceled means that prior to the engine being started the call was canceled. Gerry also explained that aborted occurs when the flight is initiated but called off. It was noted that a breakdown of calls from Belle Glade/Western communities or those west of the 20 mile bend would be brought back to the next meeting, as Mary Weeks and Dr. Alina Alonso are interested in this number.

- Quality & Patient Safety Report, Primary Care Clinics

Andrea stated that the Primary Care Clinics plan on bringing a presentation on the topic of vaccines to the September meeting. She stated that the Clinics area still working on this goal and the presentation will help explain why we are not reaching the desired goal. Dr. Andric mentioned that the conversion from AllScripts to Athena has posed a problem in reporting data, however this will improve in the coming months. Mary Weeks stated that she would like to see the data involved in follow through on the fit tests; who is give a test, and how is it returned? Dr. Andric stated that positive fit tests are referred to a gastrointestinal doctor for a colonoscopy. Mary Weeks requested follow through data on this particular test. Dr. Alonso would like the Clinics to consider making smoking cessation a quality goal this year, including pediatric education on vaping dangers.

- Quality & Patient Safety Report, Healey Center

Dr. Alonso questioned the pressure ulcers goal range. Karen Harris and Terretha Smith clarified that it was between 0-2 stage goal. Dr. Alonso also asked for clarification on the goal entered for anti-anxiety and hypnotic medications. Terretha Smith noted that the goal should read 7.5 and not 9.0 as listed. Dr. Alonso asked about the Urinary Tract Infections and Catheter reports in red and asked how many of those were permanent catheters? Terretha reported that (2) were permanent, (3) provided self-care and this number includes readmissions. Mary Weeks inquired on the number of new admissions and the turnover rate at The Healey Center, along with the center's capacity. Terretha reported that the turnover rate was low and approximately (10) per month, while the capacity was 120 with (1) bed hold.

- Quality & Patient Safety Report, Lakeside Medical Center

Dr. Alonso commented on the number of employees receiving their flu shots as being a low number. Dianne King stated that she could provide insight into raising the employee immunization rate, which is currently low at 38%. She will meet with the respective staff and provide feedback for possible implementation. Sylvia Hall from Lakeside, also mentioned that there is a meeting scheduled later this month to train staff and ensure they are all clear



on the process in place. Darcy noted that this quarter reflects both ED groups, as the new ED group did not start until February 1<sup>st</sup>. Next quarter will reflect the new ED group only and the new measures they have implemented. Dr. Scheppke noted that the last item on the dashboard labeled, Pain-Management OP-21, should not continue to be followed and will not be reported in the future. Additionally, Sylvia Hall noted that items OP-4, OP-20 along with OP-21 will no longer be reported and are no longer being measured per CMS. Dianne King complimented Lakeside staff on their sepsis numbers and measures.

- **Quality & Patient Safety Report, Pharmacy**

Andrea stated that the most notable items were the Lake Worth location added a second pharmacist on May 7, 2018 to address longer wait times and that they were looking into a plan for expansion. They will bring back more information on the plan in September.

- **Quality & Patient Safety Report, Trauma**

It was noted that all metrics were in the Green for quarter 1 and there were no questions or comments.

**CONCLUSION/ACTION: Received and filed.**

**C. COMPLIANCE**

**8C-1 RECEIVE AND FILE:**

**Summary of Compliance and Privacy Activities**

Ellen Pentland wanted to make note to the committee, that going forward the dashboard under the consent agenda will be strictly year-to-date and next fiscal year will show comparisons. Then the summary will consist of only a summary of events and not a repeat of the same data. Dr. Alonso asked what the nature of most of the findings were. Ellen stated that they consisted mostly of computers being left on, not logged off or locked, the use of wrong fax numbers and employees not using their name badges in order to be properly identified. Dr. Alonso also asked for information pertaining to the breaches listed, where patient notifications were made. Ellen stated that these involved information being sent to the wrong patient, or a patient leaving the hospital with someone else's discharge instructions. Dianne King inquired about the use of personal cell phones for medical order and information. Ellen stated that she has made it clear to staff that our policy is not to text any orders or medical information. We are looking into whether Athena has any capability for this that would be protected.

**CONCLUSION/ACTION: Received and filed.**

**D. CORPORATE RISK MANAGEMENT CLOSED MEETING**

The meeting was closed pursuant to Sections 395.0197, 400.119, 400.147, 766.101, and 768.28, Florida Statutes and other relevant statutes and regulations. The closed portion of the meeting is to address risk management matters. All persons currently present must exit the meeting except the following: Quality, Patient Safety and Compliance Committee members, Risk Management Department personnel and key clinical and leadership personnel who are directly involved in risk and quality management issues, legal counsel to the committee, and District Board members.

**9. CEO Comments**

None.

**10. Committee Member Comments**

None.

**11. Establishment of Upcoming Meetings**

- July 24, 2018 - Cancelled
- September 25, 2018
- November 27, 2018

**12. Motion to Adjourn**

There being no further business, the meeting was adjourned at 11:43 a.m.

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**Dr. Alina Alonso, Chair**

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**Date**

**HEALTH CARE DISTRICT OF  
PALM BEACH COUNTY  
QUALITY, PATIENT SAFETY & COMPLIANCE COMMITTEE**

**12 Month Attendance Tracking**

	1/23/18	3/27/18	5/22/18	9/25/18	11/27/18								
Philip Ward	N/A	✓	x										
Mary Weeks	N/A	✓	✓										
Sharon Larson	N/A	✓	x										
Alina Alonso	N/A	✓	✓										
James Elder	N/A	✓	✓										
Sean O'Bannon	N/A	✓	✓										
Dianne King	N/A	x	✓										
Steven Seeley	N/A	x	x										
Dr. Daniel Kairys	N/A	Excused	x										
Dr. David Bohorquez													

**HEALTH CARE DISTRICT**  
**Quality, Patient Safety and Compliance Committee**  
**September 25, 2018**

**1. Description: Compliance and Privacy Dashboard**

**2. Summary:**

This item presents the Compliance and Privacy Dashboard for eleven months of FY 2018.

**3. Substantive Analysis:**

The OIG believes that every effective compliance program must begin with a formal commitment by the governing body to include all the elements based on the seven steps of the Federal Sentencing Guidelines. In order to effectively manage the oversight of the Compliance Program, the Compliance Department has created a Compliance and Privacy Dashboard to report activities on a quarterly basis.

**4. Fiscal Analysis & Economic Impact Statement:**

	Amount	Budget	
Capital Requirements	N/A	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Annual Net Revenue	N/A	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Annual Expenditures	N/A	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Reviewed for financial accuracy and compliance with purchasing procedure:

N/A

\_\_\_\_\_  
Dawn Richards  
VP & Chief Financial Officer

**5. Reviewed/Approved by Committee:**

N/A

\_\_\_\_\_  
Committee Name

\_\_\_\_\_  
Date Approved



**HEALTH CARE DISTRICT**  
**Quality, Patient Safety and Compliance Committee**  
**September 25, 2018**

**6. Recommendation:**

Staff recommends the Quality, Patient Safety, and Compliance Committee receive and file the Compliance and Privacy Dashboard for eleven months of FY 2018.

Approved for Legal sufficiency:



Valerie Shahzari  
VP & General Counsel



Ellen Pentland  
Chief Compliance and Privacy Officer

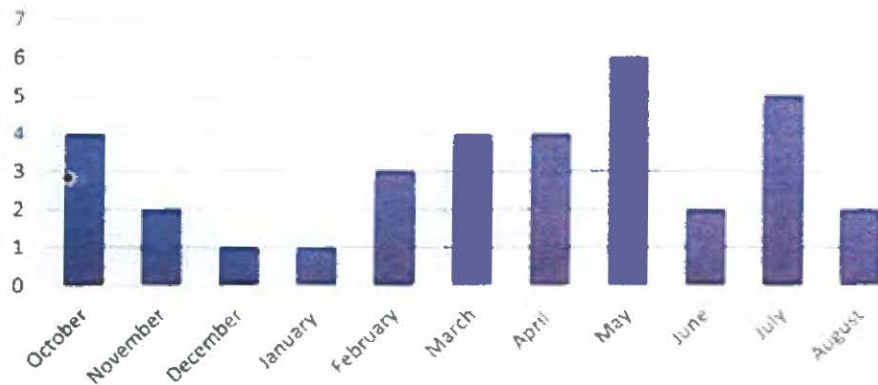


Darcy J. Davis  
Chief Executive Officer

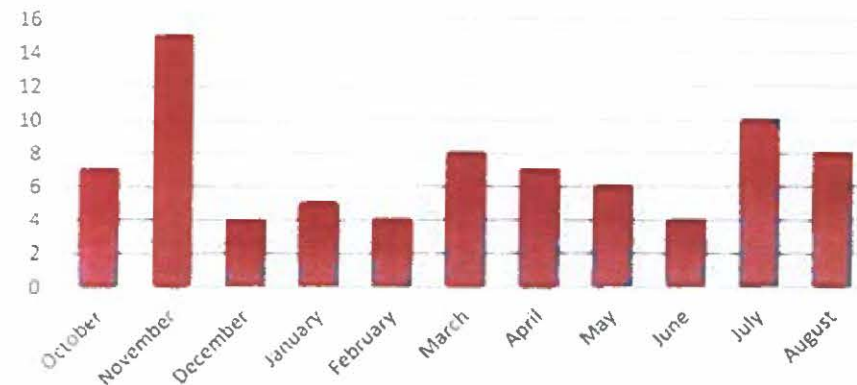
## Compliance & Privacy Dashboard

Year to Date: October 1, 2017 – August 31, 2018

Compliance Inquiries by Month



Privacy Concerns by Month



Compliance Inquiries by Month and Entity	C.L. Brumback Clinics	Health Care District	Healthy Palm Beaches	Home Office	Healey	Lakeside Medical Center	Total	Privacy Concerns by Month and Entity	Lakeside Medical Center	C.L. Brumback Clinics	E.J. Healey	Home Office	Total
October	2	0	0	1	0	1	4	October	1	4	0	2	7
November	1	0	0	0	0	1	2	November	1	4	2	1	8
December	1	0	0	0	0	0	1	December	2	0	0	0	2
January	1	0	0	0	0	0	1	January	0	2	0	3	5
February	0	1	2	0	0	0	3	February	0	1	1	1	3
March	3	0	0	1	0	0	4	March	2	6	0	0	8
April	2	1	0	0	0	1	4	April	0	4	0	3	7
May	3	1	0	0	0	2	6	May	2	3	0	1	6
June	1	1	0	0	0	0	2	June	2	1	0	1	4
July	3	1	0	0	0	1	5	July	0	4	1	5	10
August	1	0	0	0	1	0	2	August	1	6	1	0	8
<b>Total</b>	<b>18</b>	<b>5</b>	<b>2</b>	<b>2</b>	<b>1</b>	<b>6</b>	<b>34</b>	<b>Total</b>	<b>11</b>	<b>36</b>	<b>5</b>	<b>17</b>	<b>68</b>

# Compliance & Privacy Dashboard

Year to Date: October 1, 2017 - August 31, 2018

COMPLIANCE AND PRIVACY REVIEWS AND PROJECTS	October	November	December	January	February	March	April	May	June	July	August	Total
Internal Risk Assessment	2	0	1	1	2	2	4	3	3	0	2	20
OCR Investigation	0	0	0	1	0	0	0	0	0	0	0	1
Risk Assessment	0	0	0	0	0	1	1	0	0	0	0	2
OIG Work Plan FY 2018	0	0	0	0	0	0	0	0	2	0	0	2
External Audits	3	1	1	1	0	1	0	0	0	0	0	7
<b>Total</b>	<b>5</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>2</b>	<b>4</b>	<b>5</b>	<b>3</b>	<b>5</b>	<b>0</b>	<b>2</b>	<b>32</b>

Privacy Walkthroughs	Home Office	C.L. Brumback Clinics	Lakeside Medical Center	Eligibility Office	Healey Center	Total
October	0	0	0	0	0	0
November	0	0	1	0	0	1
December	0	5	0	0	1	6
January	1	1	0	0	0	2
February	0	1	0	1	0	2
March	0	2	0	0	0	2
April	0	1	0	0	0	1
May	0	3	0	1	0	4
June	0	0	0	0	0	0
July	0	0	1	0	0	1
August	0	1	0	1	0	2
<b>Total</b>	<b>1</b>	<b>14</b>	<b>2</b>	<b>3</b>	<b>1</b>	<b>21</b>

Compliance and Privacy Education	Health Care District	Lakeside Medical Center	Healey Center	C.L. Brumback Clinics	School Health	Total
October	3	1	1	1	1	7
November	3	2	1	1	0	7
December	1	2	0	0	0	3
January	2	2	0	2	0	6
February	2	0	0	0	0	2
March	2	0	0	0	0	2
April	2	0	0	0	0	2
May	1	0	0	0	0	1
June	1	0	1	0	0	2
July	1	0	1	0	0	2
August	1	0	1	1	1	4
<b>Total</b>	<b>19</b>	<b>7</b>	<b>5</b>	<b>5</b>	<b>2</b>	<b>38</b>



# Compliance & Privacy Dashboard

Year to Date: October 1, 2017 – August 31, 2018

Compliance Call Activity	
Entity	# of Calls
LMC	9
Healey	0
District	26
Clinics	17
School Health	0
Managed Care	0
Pharmacy	0

Compliance Exit Interviews	
4	

Breach Notifications	
Entity	# of Letters
LMC	0
Healey	3
District	3
Clinics	5
Pharmacy	2
School Health	0
Aeromedical	1

IT Security	
Security Incidents	2 Incident Reported
Cybersecurity Emails	1 Emails Reported

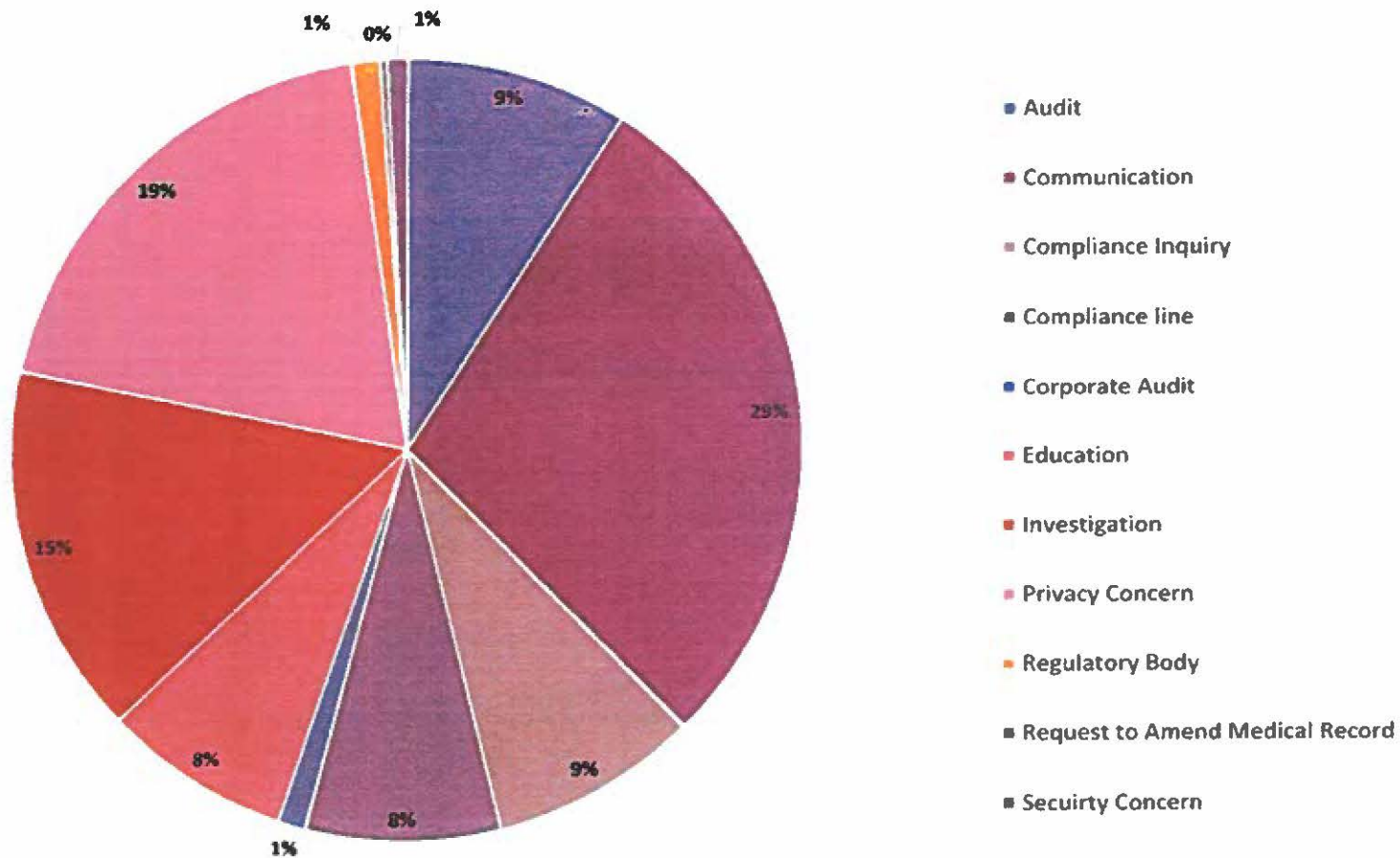
Regulatory Inquiries	OIG/SAM CHECK
5 Regulatory Inquiries Processed	Monthly Check 0 Matches

Medical Record Amendments Processed	1 Medical Record Amendments Requested
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## Compliance & Privacy Dashboard

Year to Date: October 1, 2017 – August 31, 2018

### Compliance and Privacy Activity October 1, 2017- August 31, 2018



**HEALTH CARE DISTRICT  
QUALITY, PATIENT SAFETY AND COMPLIANCE COMMITTEE  
September 25, 2018**

**1. Description: Amendment to the Quality, Patient Safety and Compliance Committee Charter.**

**2. Summary:**

This item presents proposed amendments to the Quality, Patient Safety and Compliance Committee Charter.

**3. Substantive Analysis:**

The charter was last updated on November 28, 2017. The District proposes amending the Section titled, Composition of Committee and Board Reporting. The new language specifies that (1) committee member shall represent the Glades community and additionally that (1) committee member shall also serve on the District Clinic Board. The new language also specified the Committee will evaluate the Chief Compliance and Privacy Officer Annually. Additionally, the term of Board members appointed to the Committee will now be the same as the term they are serving on the Board. Attached for your review are the following documents:

- Updated version of the charter showing the proposed amendments; and,
- A clean version of the charter to be adopted.

**4. Fiscal Analysis & Economic Impact Statement:**

	Amount	Budget
Capital Requirements	N/A	Yes <input type="checkbox"/> No <input type="checkbox"/>
Annual Net Revenue	N/A	Yes <input type="checkbox"/> No <input type="checkbox"/>
Annual Expenditures	N/A	Yes <input type="checkbox"/> No <input type="checkbox"/>

Reviewed for financial accuracy and compliance with purchasing procedure:

\_\_\_\_\_  
N/A  
Dawn Richards  
VP & Chief Financial Officer

**5. Reviewed/Approved by Committee:**

\_\_\_\_\_  
N/A  
Committee Name

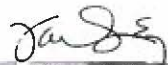
\_\_\_\_\_  
Date Approved

**HEALTH CARE DISTRICT  
QUALITY, PATIENT SAFETY AND COMPLIANCE COMMITTEE  
September 25, 2018**

**6. Recommendation:**

Staff recommends the Quality, Patient Safety and Compliance Committee approve the amendments to the Quality, Patient Safety and Compliance Charter and forward to the Board for approval.

Approved for Legal sufficiency:



Valene Shahrian  
VP & General Counsel



Ellen Pentland  
Chief Compliance Officer



Darcy J. Davis  
Chief Executive Officer



## **QUALITY, PATIENT SAFETY AND COMPLIANCE COMMITTEE CHARTER**

### **PURPOSE**

The purpose of the Quality, Patient Safety, Compliance & Patient Privacy Committee of the Health Care District and its Affiliated Entities ("District") is to assist the Board of Commissioners in fulfilling its oversight responsibilities in overseeing the quality, patient safety and risk management activities of the District and promote an organizational "Culture of Safety". The Committee will monitor and oversee the District's process for ensuring compliance with laws and regulations and the District's compliance and privacy program.

### **COMPOSITION OF COMMITTEE**

~~A minimum of two (2) Board members shall be appointed to the Committee, one of which will chair the committee. The remainder of t~~The Committee shall have at least five (5) but no more than nine (9) members. A minimum of two (2) Board members shall be appointed to the Committee, one of which will chair the Committee, and their term shall be the same as the term of their Board membership. ~~Additionally, o~~One (1) Committee member shall represent the Glades community and one (1) Committee member shall serve on the District Clinic Board. The Board shall appoint Committee members, who are not a Board member, to a four (4) year term with Committee membership limited to two (2) full terms. The composition of the Committee shall be regularly reviewed to ensure that each member meets the requirements set forth by the Board for the Committee. Each member of the Committee shall have expertise and experience in quality, patient safety, legal compliance, healthcare, risk management and/or insurance and such other matters as the Board may deem appropriate.

### **MEETINGS**

Regular meetings of the Committee shall be conducted every other month. Public notice of each meeting and the date, time and location of same shall be made as required by law. The Chief Executive Officer may cancel and/or reschedule a Regular meeting, upon proper notice to Committee members and the public, if it is determined that a quorum will not be present or for other reasons in consultation with the Chair.



There shall be an agenda for every meeting of the Committee. However, the Committee is not prohibited from discussing and/or taking action on an item or matter not specified in the agenda. Minutes of each meeting shall be accurately taken, preserved and provided to members.

Regular attendance shall be expected for all Committee members. If a member misses more than twenty-five percent (25%) of the Regular Committee meetings during the twelve (12) month calendar period, the Chair shall advise the Board.

The presence of five (5) Committee members shall be necessary at any meeting to constitute a quorum or to transact business. The Board shall promulgate rules of order for the conduct of all Committee meetings. All procedural matters not addressed in said rules of order, by this Charter, or by the Bylaws, shall be governed by the latest edition of "Roberts Rules of Order".

## **POWERS AND DUTIES**

The following functions shall be the common recurring functions of the Committee in carrying out its oversight role.

1. ***Policies & Procedures.*** The Committee shall review and approve policies and procedures developed to promote quality patient care, patient safety, risk management, and compliance.
2. ***Reporting.*** The Committee shall regularly report to the Board of Commissioners about Quality, Patient Safety & Compliance Committee activities, issues, and related recommendations; provide an open avenue of communication between Committee and the Board of Commissioners.
3. ***Quality.*** The Committee shall review, as appropriate, information relating to quality, clinical risk, and performance improvement. Monitor and assess performance against targets of the care delivery system, including clinical performance and member satisfaction with the care experience.
4. ***Patient Safety.*** The Committee evaluate results of Patient Safety Organization including recommended actions and follow-up.
5. ***Quality Improvement Plans.*** The Committee shall review and approve business unit Quality Improvement (QI) plans for quality clinical care, patient safety, and clinical

services improvement strategies. Review and update HCD QI Plan at least every three years (more often if substantial changes are made in the QI Program).

6. ***Internal Systems & Controls.*** The Committee shall oversee the development and implementation of internal systems and controls to carry out the District's standards, policies and procedures relating to risk management, including, without limitation, processes designed to facilitate communication across the organization regarding risk management, patient care loss prevention/control and safety improvement opportunities and activities and the evaluation thereof.
7. ***Risk Management Program.*** The Committee shall review and provide advice on the development and implementation of a corporate risk management program, in conjunction with existing business processes and systems, to facilitate management of the District's clinical and operational risks.
8. ***Credentialing.*** Conduct an annual formal review of the credentialing process and offer revisions to credentialing criteria to reflect best practices and protocols. Review the integrity of systems relating to the selection, credentialing, and competence of physicians and other health care practitioners, including systems for granting or terminating clinical privileges, professional or medical staff or clinical staff membership, peer review, proctoring, and continuing education.
9. ***Risk.*** The Committee shall review asset protection needs of the District, and make recommendations to the Board for approval.
10. ***Risk Management Plans.*** The Committee shall review and approve business unit Risk Management plans.
11. ***Compliance Reports.*** The Committee shall receive and review reports from the Compliance Program that may have a significant effect on the District's compliance activities or have a material impact on the financial statements.
12. ***Policy and Procedure.*** The Committee shall review and approve compliance policies, procedures, plans or the mechanism by which staff shall approve such policies, procedures and plans.
13. ***Board Report.*** The Committee shall report regularly to the District Board of Commissioners regarding the development and implementation of the District compliance plans. Annually, the Committee will evaluate the Chief Compliance and Privacy Officer.
14. ***Compliance Work Plans.*** The Committee shall ensure that the District maintains compliance work plans designed to encourage integrity, accountability in reimbursement and adherence to applicable laws. The compliance plans shall at minimum be designed and implemented to promote compliance and detect and deter non-compliance with regard to:
  - a. Medicare, Medicaid and other laws and regulations that apply to the District because of its participation in federal health benefit programs;

- b. Laws and regulations dealing with business relationships with physicians including, but not limited to, the anti-kickback statute, Stark Laws and other laws;
  - c. Federal and state anti-trust law prohibitions regarding anti-competitive conduct;
  - d. Federal Sentencing Guidelines; and,
  - e. Laws which apply to the District as a result of its tax exempt status.
15. ***Compliance Program.*** The Committee shall review the Compliance Program for adherence to the OIG's Compliance Guidance's for applicable businesses, including for hospitals, nursing homes, managed care, physician offices, etc.
16. ***Corrective Action.*** The Committee shall review and approve appropriate corrective action steps should a material error or violation of compliance policy and procedure occur.
17. ***Education.*** The Committee shall work with the Chief Compliance Officer, as necessary, to develop effective on-going training.
18. ***Monitor Compliance Program.*** The Committee shall assure that methodologies developed to monitor compliance are appropriate to maximize compliance and assure confidential treatment of material.
19. ***Standard of Conduct.*** The Committee shall periodically review and approve the Standard of Conduct.



## **QUALITY, PATIENT SAFETY AND COMPLIANCE COMMITTEE CHARTER**

### **PURPOSE**

The purpose of the Quality, Patient Safety, Compliance & Patient Privacy Committee of the Health Care District and its Affiliated Entities ("District") is to assist the Board of Commissioners in fulfilling its oversight responsibilities in overseeing the quality, patient safety and risk management activities of the District and promote an organizational "Culture of Safety". The Committee will monitor and oversee the District's process for ensuring compliance with laws and regulations and the District's compliance and privacy program.

### **COMPOSITION OF COMMITTEE**

The Committee shall have at least five (5) but no more than nine (9) members. A minimum of two (2) Board members shall be appointed to the Committee, one of which will chair the Committee, and their term shall be the same as the term of their Board membership. One (1) Committee member shall represent the Glades community and one (1) Committee member shall serve on the District Clinic Board. The Board shall appoint Committee members, who are not a Board member, to a four (4) year term with Committee membership limited to two (2) full terms. The composition of the Committee shall be regularly reviewed to ensure that each member meets the requirements set forth by the Board for the Committee. Each member of the Committee shall have expertise and experience in quality, patient safety, legal compliance, healthcare, risk management and/or insurance and such other matters as the Board may deem appropriate.

### **MEETINGS**

Regular meetings of the Committee shall be conducted every other month. Public notice of each meeting and the date, time and location of same shall be made as required by law. The Chief Executive Officer may cancel and/or reschedule a Regular meeting, upon proper notice to Committee members and the public, if it is determined that a quorum will not be present or for other reasons in consultation with the Chair.

There shall be an agenda for every meeting of the Committee. However, the Committee is not prohibited from discussing and/or taking action on an item or matter not specified in the agenda. Minutes of each meeting shall be accurately taken, preserved and provided to members.

Regular attendance shall be expected for all Committee members. If a member misses more than twenty-five percent (25%) of the Regular Committee meetings during the twelve (12) month calendar period, the Chair shall advise the Board.

The presence of five (5) Committee members shall be necessary at any meeting to constitute a quorum or to transact business. The Board shall promulgate rules of order for the conduct of all Committee meetings. All procedural matters not addressed in said rules of order, by this Charter, or by the Bylaws, shall be governed by the latest edition of "Roberts Rules of Order".

## **POWERS AND DUTIES**

The following functions shall be the common recurring functions of the Committee in carrying out its oversight role.

1. ***Policies & Procedures.*** The Committee shall review and approve policies and procedures developed to promote quality patient care, patient safety, risk management, and compliance.
2. ***Reporting.*** The Committee shall regularly report to the Board of Commissioners about Quality, Patient Safety & Compliance Committee activities, issues, and related recommendations; provide an open avenue of communication between Committee and the Board of Commissioners.
3. ***Quality.*** The Committee shall review, as appropriate, information relating to quality, clinical risk, and performance improvement. Monitor and assess performance against targets of the care delivery system, including clinical performance and member satisfaction with the care experience.
4. ***Patient Safety.*** The Committee evaluate results of Patient Safety Organization including recommended actions and follow-up.
5. ***Quality Improvement Plans.*** The Committee shall review and approve business unit Quality Improvement (QI) plans for quality clinical care, patient safety, and clinical

services improvement strategies. Review and update HCD QI Plan at least every three years (more often if substantial changes are made in the QI Program).

6. ***Internal Systems & Controls.*** The Committee shall oversee the development and implementation of internal systems and controls to carry out the District's standards, policies and procedures relating to risk management, including, without limitation, processes designed to facilitate communication across the organization regarding risk management, patient care loss prevention/control and safety improvement opportunities and activities and the evaluation thereof.
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  - c. Federal and state anti-trust law prohibitions regarding anti-competitive conduct;
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**HEALTH CARE DISTRICT BOARD  
QUALITY, PATIENT SAFETY AND COMPLIANCE COMMITTEE  
September 25, 2018**

**1. Description: Annual Evaluation – Chief Compliance and Privacy Officer**

**2. Summary:**

This agenda item presents the annual evaluation of Ellen Pentland, Chief Compliance and Privacy Officer

**3. Substantive Analysis:**

The charter of this committee and the recommendation of the Auditor General indicate that the annual evaluation of the Chief Compliance and Privacy Officer are reviewed and approved by this committee. The Chair of the Committee has consulted with management and an HCD evaluation form are attached for consideration.

**4. Fiscal Analysis & Economic Impact Statement:**

	<b>Amount</b>	<b>Budget</b>	
Capital Requirements	N/A	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Annual Net Revenue	N/A	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Annual Expenditures	N/A	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Reviewed for financial accuracy and compliance with purchasing procedure:

N/A  
Dawn Richards  
VP & Chief Financial Officer

**5. Reviewed/Approved by Committee:**

N/A  
Committee Name

N/A  
Date Approved

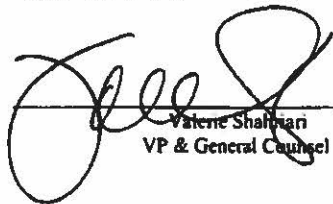


**HEALTH CARE DISTRICT BOARD**  
**QUALITY, PATIENT SAFETY AND COMPLIANCE COMMITTEE**  
**September 25, 2018**

**6. Recommendation:**

Management recommends the Committee review the prepared performance evaluation and approve a final annual evaluation for the Chief Compliance and Privacy Officer.

Approved for Legal sufficiency:

  
Valerie Shalman  
VP & General Counsel

  
Darcy J. Davis  
Chief Executive Officer

## HEALTH CARE DISTRICT OF PALM BEACH COUNTY LEADERSHIP PERFORMANCE APPRAISAL FORM

**APPRAISAL TYPE**

☐ Initial Orientation      ☐ 3 Month      ☒ Annual  
☐ Position Orientation      ☐ 6 Month

**EMPLOYEE INFORMATION**

EMPLOYEE: Ellen Pentland      EMPLOYEE ID: 0  
 DEPARTMENT: Compliance      DATE OF HIRE:             
 JOB TITLE: Chief Compliance Officer

**SCORING**

OUTSTANDING (3): Consistently exceeds expectation. Example for others.  
 EXCELLENT (2): Always meets expectation. Supervisor has complete confidence.  
 NEEDS IMPROVEMENT (1): Does not always meet expectation. Less than 100% confidence.

RATING FACTOR	DESCRIPTION	RATING
Leadership	Leads by example, demonstrating a consistently positive attitude. Develops a flexible work environment/culture that facilitates exceptional customer service, communication and performance.	<u>3</u>
Customer Service	Exhibits and promotes exceptional customer service to all internal and external customers.	<u>2</u>
Cooperation	Builds and maintains strong working relationships. Is quick to assist staff and colleagues. Adapts well to change.	<u>3</u>
Communication	Effectively communicates with others through verbal and non-verbal methods. All communication, including email, is courteous and respectful.	<u>2</u>
Decision Making	Makes informed, reasoned and expedient decisions, consistently demonstrating sound judgment. Keeps supervisor and colleagues informed of issues of importance.	<u>3</u>
Initiative	Works autonomously. Takes action in developing new methods, procedures and approaches with little to no guidance.	<u>3</u>
Job Knowledge	Demonstrates the fundamental skills, methods, and procedures required for current job functions.	<u>3</u>
Professionalism	Presents self in mature and responsible manner, including attire and punctuality. Exhibits strong ethical character in the workplace.	<u>3</u>
Quality of Work	Final work product is accurate, thorough, and timely. Achieves established goals.	<u>3</u>
Compliance	Is aware of, and promotes, adherence to all appropriate compliance and safety policies/procedures. Completes mandatory training (Compliance, HIPAA, etc.) on time. Supervisor has verified with the employee that the conflict of interest form has been completed this evaluation period.	<u>3</u>
Wellness	Enhances work environment by promoting and supporting wellness through development and implementation of a wellness initiative. Provides consistent rewards and recognition where appropriate.	<u>Implemented</u>

 OVERALL SCORE 28

Next Page

Employees receiving three or more ratings of "Does Not Meet Expectation" will be ineligible for the performance based pay increase. Additionally, employees receiving three or more ratings of "Does Not Meet Expectation" may be placed on a probationary period up to 60-days. Failure to improve performance during the probationary period may result in separation of employment.

**GOALS and SUPERVISOR/MANAGER'S**

Ellen makes the complex world of health care compliance less intimidating by working with HCD leaders and team members to continually educate them on key areas of importance. Ellen's approach to concerns is collaborative and supportive as she is able to improve the organization by focusing on process improvement. Ellen is a valuable resource for HCD and is an essential asset to the organization. Goals for next year include keeping the Board and leadership teams aware of changing shifts within the healthcare industry and continued assistance to the executive team as significant strategic initiatives are undertaken.

**EMPLOYEE COMMENTS:**

I acknowledge that I have seen and discussed this performance appraisal with my supervisor:

<div></div>		<div></div>
EMPLOYEE SIGNATURE		DATE
SIGNATURES:		
<div></div>	<div></div>	<div></div>
IMMEDIATE SUPERVISOR	DATE	NEXT LEVEL SUPERVISOR
<div></div>	<div></div>	<div></div>
DEPARTMENT DIRECTOR	DATE	HUMAN RESOURCES
<div></div>	<div></div>	<div></div>
OFFICER	DATE	DATE

**\*Note: Managers supervising clinical staff are required to submit evaluations of clinical competencies along with the Performance Appraisal.**

PREVIOUS

PRINT

**HEALTH CARE DISTRICT  
QUALITY, PATIENT SAFETY AND COMPLIANCE COMMITTEE  
September 25, 2018**

**1. Description:** Patient Relations Dashboards

**2. Summary:**

This agenda item provides the patient relations dashboard for the 3<sup>rd</sup> Trimester of the 2017-2018 school year for School Health and 2<sup>nd</sup> Quarter of 2018 for C. L. Brumback Primary Care Clinics, Edward J. Healey Nursing and Rehabilitation Center, and Lakeside Medical Center.

**3. Substantive Analysis:**

See attached reports.

**4. Fiscal Analysis & Economic Impact Statement:**

	Amount	Budget
Capital Requirements	N/A	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Annual Net Revenue	N/A	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Annual Expenditures	N/A	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>

Reviewed for financial accuracy and compliance with purchasing procedure:

N/A

\_\_\_\_\_  
Dawn Richards  
VP & Chief Financial Officer

**5. Reviewed/Approved by Committee:**

N/A

\_\_\_\_\_  
Quality, Patient Safety, and Compliance  
Committee

\_\_\_\_\_  
Date Approved

**6. Recommendation:**

Staff recommends the Committee receive and file this information.

**HEALTH CARE DISTRICT  
QUALITY, PATIENT SAFETY AND COMPLIANCE COMMITTEE  
September 25, 2018**

Approved for Legal sufficiency:



Valerie Shahriari  
VP & General Counsel



Belma Andric, MD  
CMO, VP & Executive Director of Clinical  
Services



Darcy J. Davis  
Chief Executive Officer



# **PATIENT RELATIONS DASHBOARD**

School Health 3rd Trimester

April-Jun 2018

<b>COMPLAINTS/GRIEVANCES</b>																	
<b>CATEGORY</b>	<b>2017/2018</b>	<b>JUL</b>	<b>AUG</b>	<b>SEP</b>	<b>OCT</b>	<b>NOV</b>	<b>DEC</b>	<b>T1</b> <b>2017/2018</b>	<b>JAN</b>	<b>FEB</b>	<b>MAR</b>	<b>T2</b> <b>2017/2018</b>	<b>APR</b>	<b>MAY</b>	<b>JUN</b>	<b>T3</b> <b>2017/2018</b>	<b>2016/2017</b>
	<b>TOTAL</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>TOTAL</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>TOTAL</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>TOTAL</b>	<b>TOTAL</b>
Care & Treatment	3				1		1	2				0		1		1	2
Communication	5		1					1	3			3	1			1	4
<b>TOTAL:</b>	<b>8</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>1</b>	<b>3</b>	<b>3</b>	<b>0</b>	<b>0</b>	<b>3</b>	<b>1</b>	<b>1</b>	<b>0</b>	<b>2</b>	<b>6</b>
Complaints/No Letter Required	7		1				1	2	3			3	1	1		2	5
Grievances/Letter Sent ≤ 7 days	1				1			1				0				0	1
Grievances/Letter Sent > 7 days	0							0				0				0	0
<b>Total Completed Events:</b>	<b>715,371</b>	<b>339,400</b>						<b>207,773</b>				<b>168,198</b>				<b>830,538</b>	

## **SUMMARY OF TOP COMPLAINT/GRIEVANCE CATEGORIES**

<b>APR:</b>	Findings: Mother submitted verbal complaint to the Assistant Principal. The student overheard the first nurse state to the second nurse that the student was to young to have this medical condition. The student felt like the nurse didn't believe her. Intervention: Nursing supervisor investigated incident with all parties and counseled nurse about privacy issues. Nurse did not mean it as it was taken. Nurse will not do this again.
<b>MAY:</b>	Findings: Received a verbal complaint from mother that her son tripped on the stairs and hurt his ankle. She stated, nurse never looked at ankle just asked him if he wanted ice, and never called her. He was seen by Ortho and returned to school on crutches with a note requesting extra time or use of the elevator to get to class. DX. sprained ankle. Intervention: Nursing supervisor investigated complaint and followed-up with phone call to parent. Welligent nursing notes revealed good nursing assessment and student referred to physician if ankle worsened. Advised nurse to notify parent via phone or letter for all injuries at school.
<b>JUN:</b>	NONE

## **COMPLIMENTS**

	<b>2017/2018</b>	<b>JUL</b>	<b>AUG</b>	<b>SEP</b>	<b>OCT</b>	<b>NOV</b>	<b>DEC</b>	<b>T1</b> <b>2017/2018</b>	<b>JAN</b>	<b>FEB</b>	<b>MAR</b>	<b>T2</b> <b>2017/2018</b>	<b>APR</b>	<b>MAY</b>	<b>JUN</b>	<b>T3</b> <b>2017/2018</b>	<b>2016/2017</b>
	<b>TOTAL</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>TOTAL</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>TOTAL</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>TOTAL</b>	<b>TOTAL</b>
<b># COMPLIMENTS RECEIVED</b>	<b>6</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>3</b>	<b>0</b>	<b>0</b>	<b>4</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>1</b>	<b>2</b>	<b>4</b>

## **SUMMARY OF COMPLIMENTS**

<b>APR:</b>	None
<b>MAY:</b>	Clinical nurse specialist observed school nurse going over and above to help a student in her school. The school nurse offered the student a dry pair of sneakers that were her own shoes. The nurse had a second pair of shoes in the clinic which were nursing clogs that she wore. Requesting gift card to award school nurse.
<b>JUN:</b>	IT staff member, Anthony Stamile, received a compliment for assisting supervisor securing a loaner laptop due to her computer crashing. This occurred on the last day of work for school nurses and having the laptop to use for fixing and approving time cards was imperative.





## PATIENT RELATIONS DASHBOARD

2nd Quarter 2018  
April through June

COMPLAINTS/GRIEVANCES																		
CATEGORY	2018	JAN	FEB	MAR	Q1	APR	MAY	JUN	Q2	JUL	AUG	SEP	Q3	OCT	NOV	DEC	Q4	2017
	TOTAL	#	#	#	TOTAL	#	#	#	TOTAL	#	#	#	TOTAL	#	#	#	TOTAL	TOTAL
Care & Treatment	12	1	6	6	10	2			2									26
Communication	2	2	1	1	1			1	1									7
Environmental	0				0				0									1
Medical Records	2					1	1		2									0
Nursing Related	1	1		1	1				0									4
Other	4	1	1	1	0	1	1	2	4									15
Pharmacy Related	0				0				0									3
Physician Related	3			2	2		1		1									21
Respect Related	4	1		2	2		1	1	2									3
<b>TOTAL:</b>	<b>28</b>	<b>6</b>	<b>8</b>	<b>13</b>	<b>16</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>12</b>									<b>66</b>
Complaints/No Letter Required	18	3	5	3	11	2	3	2	7									20
Grievances/Letter Sent ≤ 7 days	17	2	1	9	12	2	1	2	5									22
Grievances/Letter Sent > 7 days	0	0	0	0	0	0	0	0	0									12
<b>LETTERS NOT SENT FOR GRIEVANCES</b>	<b>4</b>	<b>1</b>	<b>2</b>	<b>1</b>	<b>4</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>									<b>11</b>
Q1 encounters: 35,946      Q2 encounters: 35,264      Q3 encounters:      Q4 encounters:																		

### SUMMARY OF TOP COMPLAINT/GRIEVANCE CATEGORIES

<b>APR:</b>	Of the 4 Occurrences there were 2 complaints and 2 Grievances which occurred across 3 clinic locations (2 Dental, 1 Womens Health, and 1 Primary Care). Top category was related to unsatisfactory care & treatment.
<b>MAY:</b>	Of the 4 Occurrences there were 3 complaints and 1 Grievance which occurred across 3 clinic locations (All Primary Care) Top category was related to poor communication by a physician and lack of respect from a registration specialist.
<b>JUN:</b>	Of the 4 Occurrences there were 2 complaints and 2 Grievances which occurred across 3 clinic locations (All Primary Care) Top categories were related to poor communication by a Dentist and lack of respect from a Medical provider.

### COMPLIMENTS

	2018	JAN	FEB	MAR	Q1	APR	MAY	JUN	Q2	JUL	AUG	SEP	Q3	OCT	NOV	DEC	Q4	2017
	TOTAL	#	#	#	TOTAL	#	#	#	TOTAL	#	#	#	TOTAL	#	#	#	TOTAL	TOTAL
<b># COMPLIMENTS</b>	<b>105</b>	<b>18</b>	<b>29</b>	<b>29</b>	<b>76</b>	<b>22</b>	<b>3</b>	<b>4</b>	<b>29</b>									<b>316</b>

### SUMMARY OF COMPLIMENTS

<b>APR:</b>	22 compliments were received across 7 clinics of which: 6 were specific to Dental employees, 4 were for Dental Clinic Teams, 2 were specific to Primary Care Providers and 9 were for Primary Care Clinic Teams.
<b>MAY:</b>	3 compliments were received across 3 clinic locations of which all 3 were for Primary Care Clinic Teams
<b>JUN:</b>	4 compliments were received across 4 clinic locations of which 1 was for a Dentist, 2 were for Medical Providers, and 1 was for a team member in Primary Care.



# PATIENT RELATIONS DASHBOARD

2nd Quarter 2018  
April through June

## REGULATORY

**Survey Type & Date**  
**Survey Findings Summary & Actions:** Complaint Survey on July 5-6, 2108 all complaints were unsubstantiated. Annual Pharmacy Inspection conducted in June with no citations.

Average number of residents: 119

## GRIEVANCES

CATEGORY	2018	JAN	FEB	MAR	Q1	APRIL	MAY	JUN	Q2	JUL	AUG	SEP	Q3	OCT	NOV	DEC	Q4	2017
	TOTAL	#	#	#	TOTAL	#	#	#	TOTAL	#	#	#	TOTAL	#	#	#	TOTAL	TOTAL
Care & Treatment	30	9	2	7	18	3	4	5	12									59
Communication	10	4	3	1	8	1	1		2									8
Discharge	1	1			1				0									1
Environmental	13	1	7	3	11		2		2									23
Noise Issue	4	1	1		2		2		2									3
Nursing Related	16	5	1	4	10	4	2		6									17
Nutrition	19	6	3	4	13	1	3	2	6									40
Other	23	4		3	7	6	4	6	16									54
Personal Belongings	25	5	3	3	11	6	5	3	14									35
Physician Related	1	1			1				0									8
<b>TOTAL GRIEVANCES:</b>	<b>142</b>	<b>37</b>	<b>20</b>	<b>25</b>	<b>82</b>	<b>21</b>	<b>23</b>	<b>16</b>	<b>60</b>									<b>259</b>

## RESOLUTION TURN AROUND TIME

# Resolved w/ 72 Hrs. Per Policy	135	37	17	23	77	21	21	16	58									252
# Not Resolved w/ 72 Hrs. Per Policy	7	0	3	2	5	0	2	0	2									7



### SUMMARY OF TOP COMPLAINT/GRIEVANCE CATEGORIES

<b><u>April:</u></b>	Personal Belongings and Other: Analysis of the grievances involving Other included concerns such as; a resident wanting to give money to a staff member, medicaid transportation, disliking of laundry soap, and request of personal coffee pot in room. There were a total of 6 missing/lost items and clothing included under personal belongings. 1 resident reported missing \$300 in cash, staff was able to find the money in the resident room. The resident was educated and encouraged to use the resident banking services. One trend identified involved residents falsely reporting missing items with the expectation that the facility will reimburse or replace the item. None of the grievances indicated abuse, neglect, exploitation or misappropriation and all were resolved with satisfactory resolution.
<b><u>May:</u></b>	Personal Belongings: A summary of the grievances revealed 17 of 119 residents had written grievances. 4 of the 17 residents accounted for multiple grievances. There were a total of 23 grievances filed, personal belonging the highest with a total of 5. These included money and I-pad of which both were found, razor, laundry bleaching of clothing, and missing socks. A total of 21 were resolved within 24-72 hours and 2 resolved with 96 hours due to multiple attempts to reach family member in both cases. Family and Resident interviews were conducted during this month.
<b><u>June:</u></b>	Care and Treatment: The data indicated 12 residents submitted a total of 16 grievances for the month, Care and Treatment were the highest with a total 6. A summary of the grievances included family member requested medication modification, resident felt staff had an attitude, cable television issues in room, and appointments. All were resolved within 72 hours with a satisfactory resolution and there were no indications of abuse, neglect, exploitation.

### COMPLIMENTS

	<u>2018</u>	<u>JAN</u>	<u>FEB</u>	<u>MAR</u>	<u>Q1</u>	<u>APRIL</u>	<u>MAY</u>	<u>JUN</u>	<u>Q2</u>	<u>JUL</u>	<u>AUG</u>	<u>SEP</u>	<u>Q3</u>	<u>OCT</u>	<u>NOV</u>	<u>DEC</u>	<u>Q4</u>	<u>2017</u>
	<u>TOTAL</u>	<u>#</u>	<u>#</u>	<u>#</u>	<u>TOTAL</u>	<u>#</u>	<u>#</u>	<u>#</u>	<u>TOTAL</u>	<u>#</u>	<u>#</u>	<u>#</u>	<u>TOTAL</u>	<u>#</u>	<u>#</u>	<u>#</u>	<u>TOTAL</u>	<u>TOTAL</u>
<b># COMPLIMENTS RECEIVED</b>	20	2	3	1	6	5	4	5	14									36

### SUMMARY OF COMPLIMENTS

<b><u>April:</u></b>	A summary of the compliments during the quarter details gratitude for excellent customer service and overall care provided by staff.
<b><u>May:</u></b>	
<b><u>June:</u></b>	

# PATIENT RELATIONS DASHBOARD

2nd Quarter 2018

April through June

## COMPLAINTS / GRIEVANCES

	2018 TOTAL	JAN #	FEB #	MAR #	Q1 TOTAL	APR #	MAY #	JUN #	Q2 TOTAL	JUL #	AUG #	SEP #	Q3 TOTAL	OCT #	NOV #	DEC #	Q4 TOTAL	2017 TOTAL
Admitting/Registration	1	1			1				0				0				0	0
Care & Treatment	7		1	1	2	3	2		5				0				0	15
Communication	2				0	1		1	2				0				0	6
Discharge	2				0	1	1		2				0				0	0
Environmental	3	1			1	1	1		2				0				0	1
Nursing Related	4	3	1		4				0				0				0	8
Nutrition	1		1		1				0				0				0	0
Other	3	1		1	2			1	1				0				0	7
Pain Management	1				0			1	1				0				0	1
Personal Belongings	1				0			1	1				0				0	2
Physician Related	11	5	1		6	2	1	2	5				0				0	7
Respect Related	2			1	1			1	1				0				0	4
<b>TOTAL CATEGORIES:</b>	<b>38</b>	<b>11</b>	<b>4</b>	<b>3</b>	<b>18</b>	<b>8</b>	<b>5</b>	<b>7</b>	<b>20</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>51</b>

## TOTAL NUMBER OF CONCERNS

Complaints/No Letter Required	34	10	4	3	17	8	4	5	17				0				0	16
Grievances/Letter Sent ≤ 30 days	4	1			1		1	2	3				0				0	9
Grievances/Letter Sent > 30 days	0				0				0				0				0	0
<b>TOTAL # OF CONCERNS:</b>	<b>38</b>	<b>11</b>	<b>4</b>	<b>6</b>	<b>18</b>	<b>8</b>	<b>5</b>	<b>7</b>	<b>20</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>25</b>

Q1 encounters: 8,433

Q2 encounters: 8,014

Q3 encounters:

Q4 encounters:

## SUMMARY OF TOP COMPLAINT / GRIEVANCE CATEGORIES

<b>APR:</b>	Two complaints were family requesting patient be helped to bedside commode in an unsafe manner; Patient family did not want the fall precaution leaf on door; Patient family thought the a/c was too cold - patient did not agree; ER complaint about wait time was caused by Radiology computer issue, now resolved; Two ER doctor complaints referred to Elite and resolved
<b>MAY:</b>	ER patient thought she would have to pay for a repeat x-ray/unhappy with nursing care; Unsubstantiated complaint about reason for discharge from ER; Visitor spotted a raccoon; Complaint about a nurse's responsiveness was referred to nurse manager; ER physician complaint referred to Elite and resolved.



	<b><u>JUN:</u></b> ER physician complaint addressed and resolved by Elite; Patient unhappy with ER Mid-Level's communication style, addressed and resolved by Elite; Former patient having difficulty getting prescription filled; Patient missing flip-flops, found; Unsubstantiated complaint about medication administration; Patient with previous issue with ER physician did not want to be seen by him again, addressed and resolved by Elite.
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<b>COMPLIMENTS</b>																		
	<u>2018</u>	<u>JAN</u>	<u>FEB</u>	<u>MAR</u>	<u>Q1</u>	<u>APR</u>	<u>MAY</u>	<u>JUN</u>	<u>Q2</u>	<u>JUL</u>	<u>AUG</u>	<u>SEP</u>	<u>Q3</u>	<u>OCT</u>	<u>NOV</u>	<u>DEC</u>	<u>Q4</u>	<u>2017</u>
	<u>TOTAL</u>	<u>#</u>	<u>#</u>	<u>#</u>	<u>TOTAL</u>	<u>#</u>	<u>#</u>	<u>#</u>	<u>TOTAL</u>	<u>#</u>	<u>#</u>	<u>#</u>	<u>TOTAL</u>	<u>#</u>	<u>#</u>	<u>#</u>	<u>TOTAL</u>	<u>TOTAL</u>
<b># COMPLIMENTS RECEIVED</b>	34	8	3	4	15	3	12	4	19				0				0	34
<b><u>APR:</u></b>	Visitor complimented a nurse on his "awesome care"; Nursing Supervisor recognized an employee for volunteering to come in early to help co-workers; Dietary employee recognized for his honesty and helpfulness.																	
<b><u>MAY:</u></b>	Twelve compliments reported after a critical OB patient arrived via ambulance; the team was able to save the mom's life; included were OR staff, Lab, Nursing Supervisor, OB doctor; Anesthesiologist and Nurse Anesthetist, ER nurse and housekeeping.																	
<b><u>JUN:</u></b>	Nursing Supervisor was complimented for helping the ER; Patient complimented Med/Surg for the awesome care she received during her 6-day stay; Tracy Miller was complimented "She made me feel comfortable, welcome and at peace about my stay here."																	

**HEALTH CARE DISTRICT  
QUALITY, PATIENT SAFETY AND COMPLIANCE COMMITTEE  
September 25, 2018**

**1. Description:** Quality & Patient Safety Reports

**2. Summary:**

This agenda item provides quality and patient safety reports for the 3<sup>rd</sup> Trimester of the 2017-2018 school year for School Health and the 2<sup>nd</sup> Quarter of 2018 for Aeromedical, C. L. Brumback Primary Care Clinics, Edward J. Healey Nursing and Rehabilitation Center, Lakeside Medical Center, Pharmacy, and Trauma.

**3. Substantive Analysis:**

See attached reports.

**4. Fiscal Analysis & Economic Impact Statement:**

	Amount	Budget
Capital Requirements	N/A	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Annual Net Revenue	N/A	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Annual Expenditures	N/A	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>

Reviewed for financial accuracy and compliance with purchasing procedure:

N/A

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Dawn Richards  
VP & Chief Financial Officer

**5. Reviewed/Approved by Committee:**

N/A

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Quality, Patient Safety, and Compliance  
Committee

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Date Approved

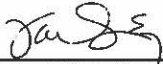
**6. Recommendation:**

Staff recommends the Committee receive and file this information.



**HEALTH CARE DISTRICT  
QUALITY, PATIENT SAFETY AND COMPLIANCE COMMITTEE  
September 25, 2018**

Approved for Legal sufficiency:



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Valerie Shahriari  
VP & General Counsel



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Belma Andric, MD  
CMO, VP & Executive Director of Clinical  
Services



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Darcy J. Davis  
Chief Executive Officer

**School Health**  
**Quality Report (School Year 2017-2018)**  
**3rd Trimester**

MEASURE SET:										ACTIONS TAKEN WHEN INDICATOR NOT MEETING GOAL	
Demographics	T1 2017/2018 (Aug - Dec)			T2 2017/2018 (Aug-March)			T3 2017/2018 (Aug-June)			T3 2017/2018	
Total Completed Events	339,400			550,902			715,371				
Office Visits	155,933			265,128			343,460				
Medications	77,621			132,996			181,252				
Procedures	44,949			75,113			101,043				
Record Review - Immunizations/Physical Exams/School Registrations	47,563			58,380			64,986				
Consultations	13,334			19,285			24,630				
Return Rate	T1 2017/2018 (Aug - Dec)			T2 2017/2018 (Aug-March)			T3 2017/2018 (Aug-June)			T3 2017/2018	
	Num/Den	%	Goal	Num/Den	%	Goal	Num/Den	%	Goal		
Total Number of Students Remained in School	126,293	81.0%	>80%	212,853	80.3%	>80%	275,881	80.3%	>80%		
Total Number of Students Excused from School	29,618	19.0%	<20%	51,985	19.6%	<20%	67,579	19.7%	<20%		
Continuum of Care	T1 2017/2018 (Aug - Dec)			T2 2017/2018 (Aug-March)			T3 2017/2018 (Aug-June)			T3 2017/2018	
	Num/Den	%	Goal	Num/Den	%	Goal	Num/Den	%	Goal		
Total Number of Student Pregnancies Identified	59			82			101				
Number of Student Pregnancies who have been referred to Healthy Mothers / Healthy Babies	58	98.3%	>95%	81	98.8%	>95%	97	96.0%	>95%		
Mandated Screenings	T1 2017/2018 (Aug - Dec)			T2 2017/2018 (Aug-March)			T3 2017/2018 (Aug-June)			T3 2017/2018	
	Num/Den	%	Goal	Num/Den	%	Goal	Num/Den	%	Goal		
Vision - Students in Mandated Grades with Permission to Screen	27612			43289			43359				
Vision - Total # of Students Screened in Mandated Grades	27214	98.6%	>45%	42958	99.2%	>95%	43144	99.5%	>95%		
Vision - Total # of Students Requiring Referral for Further Evaluation	2438			3832			3857				
Vision - Completed Outcomes		0.0%	See 3rd Tr for Goal		0.0%	See 3rd Tr for Goal	2498	64.8%	>65%		
Hearing - Students in Mandated Grades with Permission to Screen	26504			42145			42217				
Hearing - Total # of Students Screened in Mandated Grades	26173	98.8%	>45%	41871	99.3%	>95%	42039	99.6%	>95%		
Hearing - Total # Students Requiring Referral for Further Evaluation	558			897			909				
Hearing - Completed Outcomes		0.0%	See 3rd Tr for Goal		0.0%	See 3rd Tr for Goal	705	77.6%	>75%		
Scoliosis - Students in Mandated Grades with Permission to Screen	2834			7172			7137				
Scoliosis - Total # of Students Screened in Mandated Grades	2811	99.2%	>45%	7164	99.0%	>95%	7131	99.9%	>95%		
Scoliosis - Total # of Students Requiring Referral for Further Evaluation	33			86			87				
Scoliosis - Completed Outcomes		0.0%	See 3rd Tr for Goal		0.0%	See 3rd Tr for Goal	51	58.6%	>60%		
BMI - Students in Mandated Grades with Permission to Screen	14708			24518			24508				
BMI - Total # of Students Screened in Mandated Grades	14651	99.6%	>45%	24461	99.8%	>95%	24497	100.0%	>95%		
BMI - Total # of Students Requiring Referral for Further Evaluation	3364			5783			5790				
BMI - Completed Outcomes		0.0%	See 3rd Tr for Goal		0.0%	See 3rd Tr for Goal	171	3.0%	>2%		

# Aeromedical Quality Report 2nd Quarter 2018

	April		May		June		Q2 2018		Q1	
Total Hours Available for Service (36 per day)	1044	97%	1053	94%	1080	100%	3177	97%	3213	99%
Hours Utilized	55	5.3%	60	5.7%	70	6.5%	185	5.8%	241	7.5%
Total Patients Transported	52		49		44		145		174	
Dual Patients Transported									3	
Scene Flights	38	73%	38	78%	24	55%	100	69%	122	71%
Interfacility Flights	14	27%	11	22%	20	45%	45	31%	49	29%
Missed, Cancelled, Aborted Calls - Total	8		44		13		65		43	
Medical Decision			1		2		3		3	
Weather	2		22		4		28		8	
No Backup			1				1		1	
Simultaneous flights			2				2		1	
Maintenance							0		2	
County Coverage	1		4		1		6		4	
Admin			1		1		2		1	
Cancelled by Referring Agency	5		13		5		23		23	
Call to scene < 20 min	26	68.4%	34	89.5%	17	70.8%	77	77.0%	104	85.2%
Call to scene > 20 min	12	31.6%	4	10.5%	7	29.2%	23	23.0%	18	14.8%
Call to scene > 20 min West of 20 Mile Bend	11	92%	4	100%	7	100%	22	96%	16	89%
Time on Scene	08m 33s		07m 28s		07m 28s		07m 50s		07m 25s	
Dispatched to Enroute	04m 08s		03m 51s		03m 27s		03m 49s		04m 02s	
Dispatched to On-Scene	16m 20s		11m 53s		15m 14s		14m 29s		14m 23s	

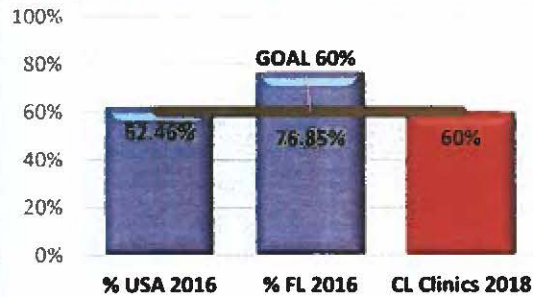




## C. L. BRUMBACK PRIMARY CARE CLINICS

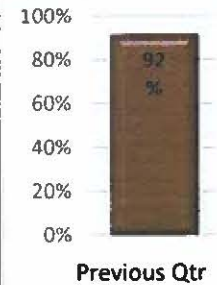
YTD JUNE 2018

### ADULT WEIGHT SCREENING AND FOLLOW UP

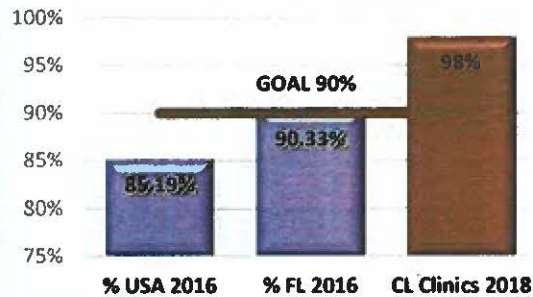


**Findings:** 1. Failure to document follow up plan. 2. Providers are not reviewing Quality Measure tab at every visit.

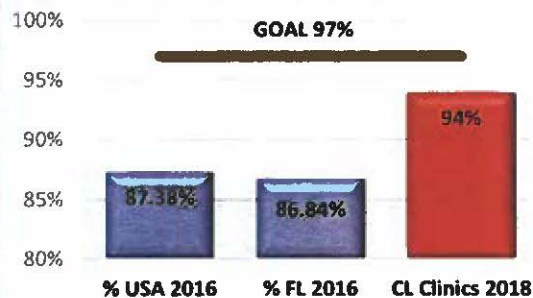
**Interventions:** Train all staff on appropriate documentation of PAP history and surgical history. 2. reeducate providers that every visit is an opportunity to provide preventative screening no matter the reason for visit.



### TOBACCO USE SCREENING AND CESSATION INTERVENTION



### ASTHMA PHARMACOLOGIC THERAPY



**Findings:** Measure definition specifies "persistent asthma" for pharmacologic therapy while EMR is capturing all types of asthma

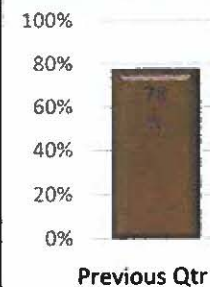
**Interventions:** Investigate documentation workflow for capturing this measure in the new EMR



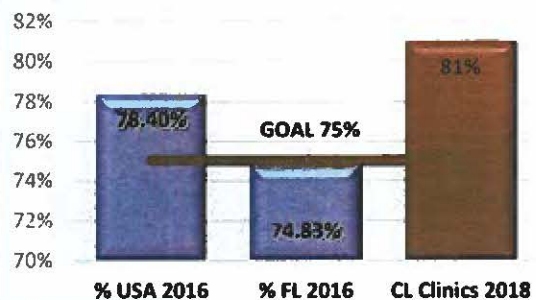


**C. L. BRUMBACK PRIMARY CARE CLINICS**  
**YTD JUNE 2018**

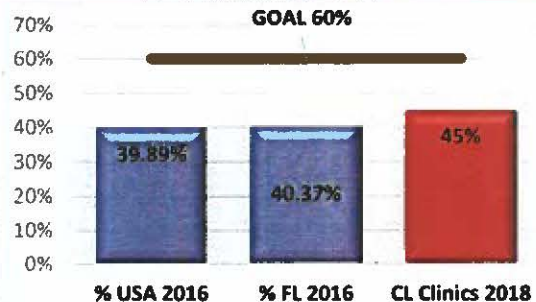
**CORONARY ARTERY DISEASE (CAD): LIPID THERAPY**



**ISCHEMIC VASCULAR DISEASE (IVD)**



**COLORECTAL CANCER SCREENING**



**Findings:** 1. Patient non compliance with returning FIT test 2. Failure to transfer previous colorectal cancer screening to new EMR

**Interventions:** 1. Continue to encourage POD. Keep FIT Test log to trigger staff follow-up on test that need to be returned. 2. Retrain staff to check Quality tab at every visit and to update information.



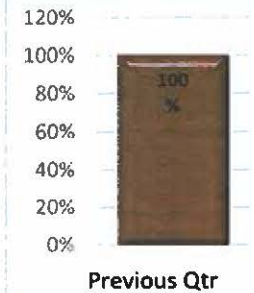
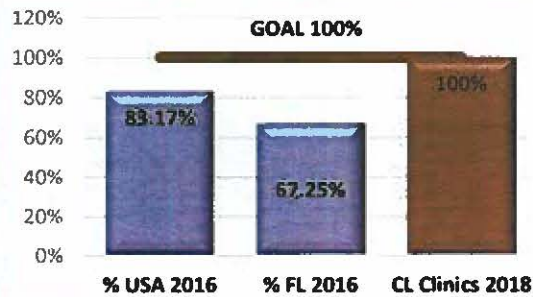


C. L. Brumback  
Primary Care Clinics  
Health Care District Palm Beach County

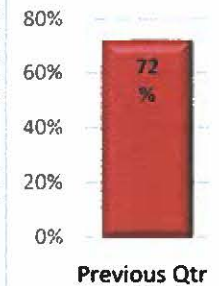
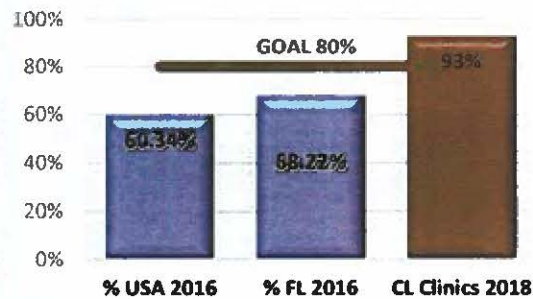
## C. L. BRUMBACK PRIMARY CARE CLINICS

YTD JUNE 2018

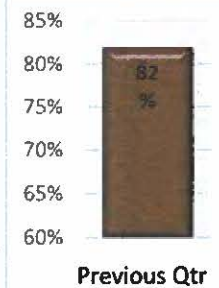
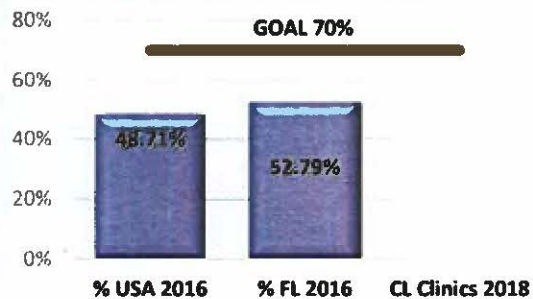
### HIV LINKAGE TO CARE



### PATIENTS SCREENED FOR DEPRESSION AND FOLLOW-UP



### DENTAL SEALANTS

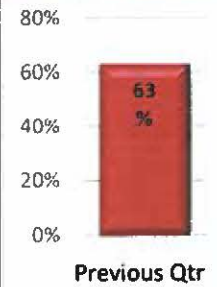
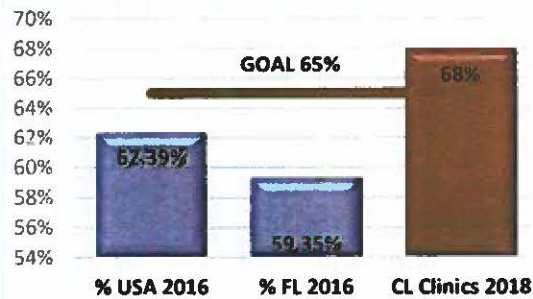




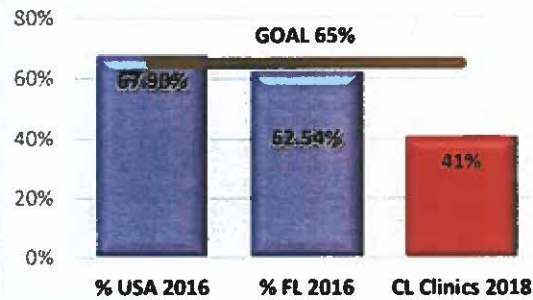
## C. L. BRUMBACK PRIMARY CARE CLINICS

YTD JUNE 2018

### HYPERTENSION



### DIABETES



**Findings:** A1C lab completed with results in ALLSCRIPTS, however lab results not transferred to Athena.

**Interventions:** Train staff to update Quality Measure Tab in Athena with A1c data from Allscripts





**Edward J. Healey Rehabilitation and Nursing Center**  
**Quality Report**  
**2nd Quarter 2018**  
**Percentages**

Total average patients served per month: 119

Measure Set: Casper Report	Comparison Group	ACTIONS TAKEN WHEN INDICATOR NOT MEETING GOAL	Previous Quarters											
MDS 3.0 Facility Level Quality Measure Report	2018 Q2	2018 Q2	2018 Q1				2017 Q4				2017 Q3			
<small>Note: Comparison Group National Percentile QMs that cross the threshold equal to or greater than 75 percentile is emphasized on the survey or any internal quality improvement initiative</small>	Goal	E/JH Percentile	% USA	% FL	GOAL	% E/JH	% USA	% FL	GOAL	% E/JH	% USA	% FL	GOAL	% E/JH
High Risk Long Stay Residents With Pressure Ulcer	< 75	88	<b>Findings:</b> Of the 85 residents included in the sample set, only 9 were identified with a pressure ulcer. 5 admitted and 4 acquired of which 2 have since resolved. 2 residents were non-compliant with their plan of care despite risks and ongoing education on refusal of care. 1 resident continued to attend school at PBSC 4x/week until mid-May. <b>Interventions:</b> 1. Risk assessment is completed on admission, weekly X 4weeks and as needed. 2. Skin checks weekly & as needed. 3. Use of Interact Stop & Watch upon identification of any change in condition. 4. Review of preventative measures and revision of care plans as needed. 5. Nutritional assessment and Therapy evaluation if indicated. 6. Medical work-up and eval by Practitioner 7. Weekly review at the IDT Focus meeting.											
New/worse Pres Ulcer (S)	< 75	8	1.0	0.5	0.0	0.0	0.8	0.4	0.0	0.8	0.5	0.0	0.0	0.0
Experiencing One or More Falls with Major Injury	< 75	8	3.5	2.8	0.0	0.0	3.5	2.9	0.0	3.5	2.9	0.0	0.0	0.0
Falls (L)	< 75	8	45.6	41.1	12.0	22.2	45.5	40.9	15.5	45.4	40.9	12.0	14.8	14.8
Who Have Depressive Symptoms	< 75	0	4.8	1.2	1.0	0.0	4.8	1.1	0.0	5.0	1.1	1.0	0.0	0.0
Who Lose Too Much Weight	< 75	7	7.9	7.9	6.0	6.0	7.4	7.9	10.3	7.9	7.8	6.0	6.1	6.1
Who Received an Antipsychotic Medication (L)	< 75	75	15.1	14.4	15.0	17.8	15.4	14.8	16.8	15.5	15.1	15.0	17.0	17.0
Who Received an Antipsychotic Medication (S)	< 75	8	2.1	2.2	2.0	0.0	2.2	2.2	0.0	2.2	2.2	2.0	0.0	0.0
Who Received Anti-anxiety or Hypnotic Medication	< 75	85	7.7	7.5	9.0	8.8	7.9	8.2	8.4	8.1	8.2	9.0	9.9	9.9
Who Self Report Moderate to Severe Pain (L)	< 75	51	6.3	4.0	5.0	9.6	5.4	3.4	6.8	5.6	3.4	5.0	7.1	7.1
Who Self Report Moderate to Severe Pain (S)	< 75	84	13.1	9.0	2.0	33.3	9.6	13.5	0.0	13.5	9.8	2.0	0.0	0.0
Who Were Physically Restrained	< 75	47	0.4	0.3	0.0	0.0	0.4	0.3	0.0	0.4	0.3	0.0	0.0	0.0
Whose Behavioural Symptoms Affect Others	< 75	57	21.1	15.3	12.0	8.3	21.3	15.7	4.5	21.4	16.7	3.0	2.8	2.8
Increase ADL Help (L)	< 75	38	16.0	14.1	10.0	8.8	15.2	13.7	9.3	15.2	13.9	10.0	8.3	8.3
with a Catheter Inserted and Left in Their Bladder	< 75	56	2.5	1.9	1.9	3.8	2.1	1.6	5.8	2.2	1.7	6.0	6.9	6.9
With a Urinary Tract Infection	< 75	59	3.1	3.0	3.0	5.1	3.5	3.5	2.6	3.7	3.8	3.0	2.6	2.6
Low Risk L&Rts Who Lose Control of Their Bowel or Bladder	< 75	48	48.2	54.4	47.0	42.3	47.8	54.4	50.0	47.6	54.6	47.0	47.1	47.1
Move Independent Worsens (L)	< 75	19	New indicators, will provide data in the future.											
Improvement in Function (S) Higher % Better	< 75	90												



**QUALITY CORE MEASURES REPORT**  
**2nd Quarter April - June 2018**  
**PRELIMINARY REPORT**

Inpatient Quality Measures	AVG FL*	AVG LMC 2017	LMC GOAL	Sampled Population (defined by Press Ganey™)	Patient Encounters: 8014 2 Q '18	Actions Taken When Indicator not Meeting Goal	Patient Encounters: 8443 1Q '18	Patient Encounters: 8,356 4Q '17	Patient Encounters: 7,836 3Q '17	Patient Encounters: 8,733 2Q '17
<b>Emergency Department: ED-1a</b> Median time from ED arrival to ED departure for admitted patients. Numerator: Departed ED in less than 267 minutes. Denominator: Measure sampled population for any ED Patient from the facility's emergency department.  <p align="right">CMS/TJC</p>	258 mins	257 mins	<267 mins	45/90	264 mins 50%	Findings: The goal was met for ED arrival to ED departure for admitted patients.  Interventions: Reviewed and analyze the 3 months of data collection for ED statistics by ED manager for improvement opportunities on patient flow. The results have been discussed with physicians and frontline staff to develop and implement improvement strategies. Meeting scheduled September 21st with Medhost to review ER process, timelines and timestamp from presentation to admission or transfer.	286 mins 36%	283 mins 49%	283 mins	248 mins *****
<b>Emergency Department: ED-2a</b> Median time from decision to admit time to ED departure for admitted patients.  Numerator: Admitted and departed ED in less than 79 mins. Denominator: Measure sampled population or any ED Patient from the facility's emergency department.  <p align="right">CMS/TJC</p>	92 mins	94 mins	<79 mins	33/90	94 mins 37%	Finding: Based on review of 4 cases found that the median time from decision to admit to ED departure ranges from 3-7.5 hours. Consideration given to findings of the patients condition, stabilization and treatment.  Interventions: Reviewed process for transitions of care with each service line. The policy and procedure for Admission Report Process has been reviewed and implemented.	183 mins 33%	89 mins 39%	118 mins	83 mins
<b>Immunizations (seasonal): IMM-2</b> Influenza Immunization Numerator: Number hospitalized inpatients 6 months or older screened for seasonal influenza immunization status and vaccinated if indicated. Denominator: Acute care hospitalized inpatients age 6 months and older discharged during October, November, December, January, February or March.  <p align="right">CMS/TJC</p>	97%	90%	>98%	NA	NA	Findings: NA  Interventions:	94%	82%	N/A	N/A
<b>Perinatal Care: PC-01</b> Patients with elective vaginal deliveries or elective cesarean births at >= 37 and < 39 weeks of gestation completed. (Lower percentage is better, for cases that fall into measure).  Numerator: Patients with elective deliveries. Denominator: Patients delivering newborns with >= 37 and < 39 weeks of gestation completed.  <p align="right">TJC</p>	2%	0%	0%	0/10	0%	Findings: Goals were met.  Interventions: No actions required.	0%	0%	0%	0%
<b>Perinatal Care: PC-02</b> Nulliparous women with a term, singleton baby in a vertex position delivered by cesarean birth (Lower percentage is better).  Numerator: Patients with cesarean births. Denominator: Nulliparous patients delivered of a live term singleton newborn in vertex presentation.  <p align="right">TJC</p>		31%	<20%	3/14	21%	Findings: All three records were reviewed. C-Sections were performed due to findings but not limited to Prolonged Active Phase of Labor, Non-Reassuring FHR, Failed Dilatation with Pitocin Augmentation and Cephalopelvic Disproportion. The C-Sections were required based on ACOG standards. Interventions: No further actions required.	18%	31%	17%	31%
<b>Perinatal Care: PC-03</b> Patients at risk of preterm delivery at >=24 and <34 weeks gestation receiving antenatal steroids prior to delivering preterm newborns (Higher percentage is better). Numerator: Patients with antenatal steroids initiated prior to delivering preterm newborns. Denominator: Patients delivering live preterm newborns with >=24 and <34 weeks gestation completed  <p align="right">TJC</p>		100%	100%	0/0	NP ****	Findings: No population.  Interventions: No actions required.	NP ****	N/A	100%	100%



**QUALITY CORE MEASURES REPORT**  
2nd Q April - June 2018  
PRELIMINARY REPORT

Inpatient Quality Measures	AVG FL*	AVG LMC 2017	LMC GOAL	Sampled Population (defined by Press Ganey**)	Patient Encounters: 8014 2nd Q'18	Actions Taken When Indicator not Meeting Goal	Patient Encounters: 8443 1Q '18	Patient Encounters: 8,358 4Q '17	Patient Encounters: 7,835 3Q '17	Patient Encounters: 8,733 2Q '17
<b>Perinatal Care: PC-04</b> <b>Health Care-Associated Bloodstream Infections in newborns</b> <b>(Lower percentage is better).</b>  Numerator: Newborns with septicemia or bacteremia. Denominator: Live born newborns  TJC		0	0	0	NP ****	Findings: No population  Interventions: No actions required.	NP ****	N/A	0	0
<b>Perinatal Care: PC-05</b> <b>Exclusive breast milk feeding during the newborn's entire hospitalization.</b> <b>(Higher percentage is better)</b> Numerator: Number of moms Exclusively Breast Feeding. Denominator: Single term newborns discharged alive from the hospital.  TJC		14%	>13%	2/29	7%	Findings: Based on review of all cases (79% ) of the sampled population both breast and bottled fed. (14%) bottle fed only and (7%) strictly breast fed.  Interventions: To promote exclusive Breastfeeding educational classes are being scheduled for moms prior to delivery at the physicians office. Educational brochures and handouts on breastfeeding are given to the patients that present to the unit prior to delivery for antepartum services.	4%	16%	3%	17%
<b>***Sepsis: SEP-1</b> <b>Early management bundle, severe sepsis/septic shock</b> <b>Special Note: Measure is not publicly reported by Hospital Compare.</b>  Numerator: Patients who received ALL of the following within three hours of presentation of severe sepsis: Specific Labs, Hydration, Examination (i.e. B/P Antibiotics, Perfusion assessment). Denominator: Inpatients age 18 and over with an ICD-10-CM Principal or Other Diagnosis Code of Sepsis, Severe Sepsis or Septic Shock.  CMS/TJC	57%	76%	>60%	11/14	79%	Findings: The goal was met for Early management bundle, severe sepsis/septic shock.  Interventions: Concurrent chart reviews are completed for all Sepsis cases. All failed cases are reviewed for improvement opportunities. Failed cases are reviewed by the CMO/ Nursing Manager and the findings are presented and discussed with physicians/frontline staff.	72%	74%	74%	77%
Numerator: Patients who received no VTE prophylaxis prior to the VTE diagnostic test order date. Denominator: Patients who developed confirmed VTE during hospitalization.  CMS/TJC	1%	0%	0%	0/0	NP ****	Findings: No population  Interventions: No actions required	NP ****	0%	0%	0%

\*The October 2018 Hospital Compare Preview Report for reporting period July 27th through August 25, 2018 has been used to update the current Florida Averages for the following Core Measures noted in column 2: ED-1a, ED-2a, IMM-2 and Sep-1.

\*\*Press Ganey

\*\*\*Sepsis benchmark goal was amended on August 31st at the Sepsis Committee Meeting. After reviewing the Quality Net CMS Hospital Inpatient Sepsis Quality report, were able to determine that the benchmark established for Lakeside Medical Center was significantly higher than that of the National and State average. A review of the previous 3 quarters were used as a reference to determined the newly established goal of 60% versus the previous goal of 90%.

\*\*\*\* NP= No Patients

\*\*\*\*\* Correction made to 2nd Quarter 2017 ED 1a previous documentation 227 mm.

**QUALITY CORE MEASURES REPORT**  
2nd Quarter April - June 2018  
**PRELIMINARY REPORT**

Outpatient Quality Measures	AVG FL *	AVG LMC 2017	LMC GOAL	Sampled Population (defined by Press Ganey**)	Patient Encounters: 8014 2Q '18	Actions Taken When Indicator not Meeting Goal	Patient Encounters: 8443 1Q '18	Patient Encounters: 8,356 4Q '17	Patient Encounters: 7,836 3Q '17	Patient Encounters: 8,733 2Q '17
<b>Acute Myocardial Infarction: OP-3a</b> Median time to transfer to another facility for acute coronary interventions Numerator: Number of patients transferred to another facility with less than 90 minutes Denominator: Patients with Transfer for Acute Coronary Intervention. CMS/TJC	56 mins	114 mins	<90 mins	1/3	94 mins 67%	Findings: Based on review of all 3 cases Median time for transfer to another facility for acute coronary intervention range from 1-2.5 hrs.  Interventions: Chart review findings are discussed with Dr. Padron Chief Medical Officer and Dr. Perezalonso ED Director for the purpose of establishing improvement opportunities during the transfer process. Planning continues with AMR contract implementation.	100 mins 0%	100 mins 0%	94 mins	N/A
<b>Chest Pain: OP-5</b> Median time to EKG (Goal 10 mins) Numerator: Number of patients received EKG within 10min upon arrival to ED. Denominator: Emergency Department AMI or Chest Pain patients (with Probable Cardiac Emergency Department AMI or Chest Pain patients (with Probable Cardiac Chest Pain). CMS/TJC	7 mins	6 mins	<10 mins	17/27	9 mins 63%	Findings: The goal was met for Median time to EKG completion. Based on review of 4 cases Median time for EKG ranged from 35 minutes to 1hour relative to initial presentation and patients complaints. Interventions: Audit records not meeting goal and share with CMO/Nurse Manager. Complete PDSA (Plan do study Act) to determine areas of opportunities for improvement.	6 mins 56%	7 mins	2 mins	6.5 mins
<b>Emergency Department Throughput: OP-18</b> Median time from ED arrival to discharge home or transferred Numerator: Number of patients discharged in less than 120 minutes. Denominator: Any ED patient from the facility's emergency department. CMS/TJC	141 mins	124 mins	<120 mins	50/99	147 mins 51%	Findings: Based on review of 5 cases Median time from ED arrival to discharge ranged from 6.5-9 hrs. relative to the complexity of the patient condition and treatment plan. Conditions ranged from Severe encephalopathy (transferred to Orlando), Hyperglycemia, Urinary retention, AMI, Neurology. Interventions: Discuss chart review findings with Dr. Padron Chief Medical Officer and Dr. Perezalonso ED Director for review with ED physicians and staff for establishment of improvement opportunities. Future goals include discussion to add additional service lines ( Orthopedics, GI etc.).	122 mins 49%	139 mins 45%	137 mins *****	111 mins
<b>Stroke: OP-23</b> Stroke patient arriving in ED w/in 2 hours of onset of symptoms who had CT or MRI results w/in 45 mins of arrival (Higher percentage is better). Numerator: Emergency Department Acute Ischemic Stroke or Hemorrhagic Stroke patients. Denominator: Emergency Department Acute Ischemic Stroke or Hemorrhagic Stroke patients arriving at the ED within 2 hours of the Time Last Known Well with an order for a head CT or MRI scan. CMS/TJC	75%	100%	100%	0/0	N/A	Findings: No population.  Interventions: No actions required.	N/A	N/A	N/A	N/A

\*The October 2018 Hospital Compare Preview Report for reporting period July 27th through August 25, 2018 has been used to update the current Florida Averages for the following Core Measures noted in column 2: OP-3a, OP-5, OP-18 and OP-23.

\*\* Press Ganey

Correction made to 2nd Quarter 2017 OP-18 previous documentation 129 mins.



## Pharmacy Services Quality Report 2nd Quarter 2018

Measure Set:				ACTIONS TAKEN WHEN INDICATOR NOT MEETING GOAL				Previous Quarters											
Pharmacy Quality Measures								2018 Q1			2017 Q4			2017 Q3			2017 Q2		
	Goal	Total						Goal	Total		Goal	Total		Goal	Total		Goal	Total	
		#	%						#	%		#	%		#	%		#	%
340B utilization		72,679							70,737			74,511			66,111			68,898	
Total HCD prescriptions sold (excludes RW)		72,250	99.4						70,238	99.3		73,560	98.7		65,746	99.4		68,070	97.4
340B prescription fills sold		17,990	24.9	Only at WPB, Lantana, Lake Worth, Delray locations					4,648										
Central Fill																			
Ready when promised (non-waiters)																			
Belle Glade		5,904	99.8						5,482	99.9		52,657	97.9		51,129	98.2		52,240	98.2
Boca Raton									1,859	99.0		5,360	99.9		5,529	99.8		5,578	99.5
Delray		13,107	99.0						230	97.5		230	97.5						
Jupiter		2,893	99.9						9,182	98.2		10,877	98.8		9,822	96.3		9,776	97.1
Lake Worth		11,006	96.3						2,261	100.0		801	99.8						
Lantana		11,073	97.9						10,474	92.4		10,420	95.2		8,327	96.2		8,178	96.2
West Palm		12,888	93.3						10,463	99.3		9,857	97.8		12,311	99.2		12,000	98.9
									13,999	97.8		15,112	98.3		15,140	99.3		15,918	99.3
Prescriptions designated as waiters												16,078			14,192			13,867	
Belle Glade		1,446	19.7						2,233	28.9		2,247	29.5		2,033	26.9		2,128	25.9
Boca Raton									463	21.8		201	46.6						
Delray		1,723	11.6						2,880	23.9		2,942	21.3		3,499	26.3		3,637	25.0
Jupiter		339	11.2						806	29.3		1,217	29.2						
Lake Worth		653	5.6						1,588	13.2		1,939	15.7		1,342	13.9		2,141	18.8
Lantana		2,731	19.8						4,450	28.8		4,357	20.7		3,494	22.1		3,257	20.0
West Palm		3,756	22.6						3,967	22.1		3,175	17.4		3,824	20.2		2,704	13.2
Prescriptions returned to stock												5,571			5,134			3,970	
Belle Glade		533	2.3						453	5.9		464	6.1		433	5.7		476	5.7
Boca Raton									77	3.6		18	4.2						
Delray		947	6.4						906	7.5		1,160	8.4		1,032	7.7		887	5.9
Jupiter		94	3.1						120	3.9		38	1.9						
Lake Worth		754	6.5						751	6.7		892	7.2		781	7.9		746	6.8
Lantana		948	6.9						775	6.2		946	6.7		956	6.0		938	5.7
West Palm		1,989	12.0						1,720	9.6		2,053	11.2		1,952	10.3		1,812	8.8
Total wait time in minutes (waiters)		21.72 Minutes							19.62 minutes			20.71 minutes			21.37 minutes			22.61 minutes	
Belle Glade		17.8 mins							16.57 mins			16.74 minutes			16.1 minutes			18.19 minutes	
Boca Raton									11.19 mins			10.23 minutes							
Delray		19.3 mins							25.93 mins			29.81 minutes			26.31 minutes			25.92 minutes	
Jupiter		6.8 mins							7.86 mins			10.8 minutes							
Lake Worth		25.6 mins							31.11 mins			26.87 minutes			24.37 minutes			26.7 minutes	
Lantana		23.2 mins							18.39 mins			21.72 minutes			18.48 minutes			18.82 minutes	
West Palm		30.6 mins							26.32 mins			28.79 minutes			21.61 minutes			23.41 minutes	
Total out of stock fills												3,050			2,489			2,290	
Belle Glade		151	2.1						113	1.5		162	2.1		149	2.0		188	2.4
Boca Raton									68	3.2		28	6.4						
Delray		132	1.1						256	2.1		532	3.8		490	3.6		210	1.5
Jupiter		157	5.2						85	2.8		179	8.4						
Lake Worth		308	2.6						882	9.8		958	7.4		459	4.6		496	4.7
Lantana		292	2.1						357	2.4		421	2.9		485	3.1		453	2.9
West Palm		310	1.8						408	2.2		770	4.2		906	4.8		943	5.0

Outbound notification system being assessed; budgeted for fiscal year 2019 - outbound messaging would notify patients that they have medications ready to be picked up and should reduce return to stocks and by doing so, hopefully improving compliance.

New staff members



**Trauma  
Quality Report  
2nd Quarter 2018  
Percentages**

Measure Set:				ACTIONS TAKEN WHEN INDICATOR NOT MEETING GOAL				Previous Quarters								
Eligibility				2018 Q2				2018 Q1			2017 Q4			2017 Q3		
				Num/Den	%	Goal	Num/Den	%	Goal	Num/Den	%	Goal	Num/Den	%	Goal	
Total Number of Records Entered Beyond Three Business Days				76	8.7%	<5%	Change of staff at the Trauma Center resulted in a delay of entering records within 3 business days. Trainings were issued at the District to bring the new hires up to speed. This issue has since been corrected.	52	4.6%	<5%	41	3.6	<5%	32	3.2	<5%
Total Number of Trauma Patients Seen				1321						1116			1117			996
Referral Hospital Length of Stay																
Referral Hospital Length of Stay > 6 Hours				16	4.0%	<5%		5	1.5	<5%	5	1.5	<5%	3	1.0	<5%
Total Number of Interfacility Transfers				409										337		
Trauma Agency TQIC Case Review								Trauma Agency Quality Metrics Review								
Type of Review			Total	% of Total Cases Reviewed				Type of Review		Occurance	Result					
Total DOA Cases Reviewed			13	14%				Total ME Cases Reviewed for Fallout		482	1 Case Resulted in Fallout					
Total Hospice Cases Reviewed			41	43%				Total Interfacility Cases Reviewed for Appropriate Transfer, Missed Opportunities, and Timeliness		498	409 Appropriate Transfers 86 Consuoked Appropriately 3 Missed Opportunities					
Total Non-Viable Cases Reviewed			32	33%				St. Mary's Site Visit Data Reviews, Trainings and Meetings Held		4	4 PI Recommendations Made					
Total Non-Trauma Related Determinations Reviewed			1	1%				Delray Site Visit Data Reviews, Trainings and Meetings Held		3	3 PI Recommendations Made					
Total Cases Presented for Further Quality Analysis and Review			6	6%				Trauma Agency Educational Outreaches Completed (EMS, PBC Schools, Acute Care Facilities, Trauma Centers, FHP, and General Public)		32	5 Topics					
Total Pre-Hospital Issues Identified, Discussed, and Presented for Educational Opportunities			3	3%												
Total Cases Reviewed for Delray Medical Center			51	53%												
Total Cases Reviewed for St. Mary's Medical Center			45	47%												

**HEALTH CARE DISTRICT**  
**Quality, Patient Safety and Compliance Committee**  
**September 25, 2018**

**1. Description: Summary of Compliance and Privacy Activities**

**2. Summary:**

This item presents the summary of the District's compliance and privacy activities for the timeframe of April 1, 2018 to August 31, 2018 of FY 2018.

**3. Substantive Analysis:**

The purpose of this summary is to provide an overview of compliance activities and actions. The OIG recommends reporting on a regular basis to the governing body, CEO, and compliance committee with regard to planning, implementing, and monitoring the compliance program. Reporting the compliance activities helps to establish methods to improve the District's efficiency and quality of services, and to reduce the District's vulnerability to fraud, waste, and abuse.

**4. Fiscal Analysis & Economic Impact Statement:**

	Amount	Budget	
Capital Requirements	N/A	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Annual Net Revenue	N/A	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Annual Expenditures	N/A	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Reviewed for financial accuracy and compliance with purchasing procedure

N/A

\_\_\_\_\_  
Dawn Richards  
VP & Chief Financial Officer

**5. Reviewed/Approved by Committee:**

N/A

\_\_\_\_\_  
Committee Name

\_\_\_\_\_  
Date Approved

**HEALTH CARE DISTRICT**  
**Quality, Patient Safety and Compliance Committee**  
**September 25, 2018**

**6. Recommendation:**

Staff recommends the Quality, Patient Safety and Compliance Committee receive and file the District's Summary of Compliance and Privacy Activities for the timeframe of April 1, 2018 to August 31, 2018 of FY 2018.

Approved for Legal sufficiency:



Valerie Shahrani  
VP & General Counsel



Ellen Pentland  
Chief Compliance and Privacy Officer



Darcy J. Davis  
Chief Executive Officer



# Summary of Compliance Activities

**April 1, 2018 – August 31, 2018**

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## Highlights

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- **Annual Compliance and Privacy Education**

Annually, the District educates its workforce on Compliance and Privacy awareness. This education is intended to familiarize the workforce with the District's Compliance and Privacy Program, and to help staff understand their responsibilities under the District's code of conduct, and compliance and privacy policies. This training takes place in the summer and includes employees at all Health Care District of Palm Beach County locations. This year the annual education was conducted in classroom style lecture at the Healey Center to all of its employees over the course of 2 weeks to accommodate all working shifts

- **Monthly Compliance and Privacy Mini Modules**

The Compliance Department has revamped the delivery method of the annual training to staff. The annual education is broken down to twelve (12) mini modules that are delivered one (1) module per month to all employees.

- **Workgroup Initiatives**

As part of our ongoing initiative to breakdown silos and encourage quick action and productive decision making between facilities and departments, the Compliance and Privacy team holds monthly and quarterly workgroups on varying topics. On a quarterly basis the Non-Discrimination in healthcare workgroup, the Billing workgroup, and HIPAA/Privacy workgroup. These workgroups meet to discuss current topics, regulatory changes, and policy and procedure updates.

## Training and Education

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Trainings provided by Compliance and Privacy Department staff:

- New Hire Orientation – monthly training on Compliance, Privacy and Security
- Non-Discrimination in Healthcare - Quarterly Meeting
- Billing Workgroup- Quarterly Meeting
- HIPAA Workgroup- Quarterly Meeting
- Compliance Connection- Third Quarter 2018 Issue
- Compliance Connection –Security
- Compliance, Privacy, and Code of Conduct Mini Module Training- All Staff



**Honesty. Integrity. Accountability.**  
*It's all in our hands.*

## Summary of Compliance Activities

**April 1, 2018 – August 31, 2018**

- Compliance Annual Education: E.J. Healey Center On-site
- Finance Department
- School Health Education Day
- C.L. Brumback Clinic Staff Orientation
- Medically-Assisted Treatment (MAT) program training
- HIPAA Privacy Training, G4S Staff

### Communication

- 28% of all compliance activity is inclusive of communication

### Hotline Activity

- 33 hotline calls between April 1, 2018 – August 31, 2018

### HIPAA Privacy Incidents

For the period of April 1, 2018 through August 31, 2018 the Compliance Department received thirty-five (35) privacy concerns, of those concerns five (5) resulted in a breach that required patient notification. Sixteen (16) privacy concerns were investigated and resolved with no findings that eluded to a breach of protected health information. Fourteen (14) privacy concerns have no substantiation and the issue was closed. Education was provided to staff when applicable for privacy concerns this period as corrective action.

### Privacy Walkthroughs

<u>Entity</u>	<u>Findings</u>	<u>Corrective Action Plan</u>
Belle Glade Clinic	2 opportunities for enhancement	Completed
Jerome Golden & Lewis Center	3 opportunities for enhancement	Completed
Jupiter Clinic	1 opportunity for enhancement	Completed
Delray Beach Clinic	3 opportunities for enhancement	Completed
Eligibility (Belle Glade)	1 opportunity for enhancement	Completed
Eligibility (Delray Beach)	0 opportunities for enhancement	Completed
Lakeside Medical Center	1 opportunity for enhancement	Completed

### Auditing and Monitoring

- Review of Athena Consents
- Controls Over Opioid Treatment Programs
- Discharge Disposition
- Limited Data Sets and Data Use Agreements
- Joint Commission Mock Survey: Lakeside Medical Center
- Asset Inventory of Laptops and iPads



**Honesty. Integrity. Accountability.**  
*It's all in our hands.*



## Summary of Compliance Activities

**April 1, 2018 – August 31, 2018**

- Uses and Disclosures of Facility Patient Directory Review: Lakeside Medical Center & E.J. Healey
- Skilled Nursing National Background Screening

### Regulatory Matters

- **OCR Levies Close to \$80M in HIPAA Privacy Rule Fines**
  - The Office for Civil Rights has assessed close to \$80 million in fines in 55 cases of HIPAA Privacy Rule violations since the rule took effect in April 2003. The office has investigated complaints against many types of entities, including national pharmacy chains, major medical centers, group health plans, hospital chains, and small providers. The most common types of entities that OCR has required to take corrective action were general hospitals, private practices and physicians, outpatient facilities, pharmacies, and health plans. The compliance issues investigated most by OCR are, in order of frequency; Impermissible uses and disclosures of PHI, Lack of safeguards of PHI, Lack of patient access to PHI, Lack of administrative safeguards of ePHI, Use or disclosure of more than the minimum necessary PHI. For the first half of this year, OCR has reported only two HIPAA settlements and one HIPAA decision from an HHS Administrative Law Judge, amounting to around \$7.9 million in fines.
- **New OCR Guidelines on Software Vulnerabilities and Patching**
  - The Department of Health and Human Services Office for Civil Rights (OCR) recently issued a cybersecurity report that focuses on software bugs and patches. Software bugs are mistakes in a software code that can negatively impact how the software operates. These bugs can create computer system vulnerabilities and put electronic protected health information (ePHI) at risk. Patches are fixes to the software bugs that correct the software operation. They can be applied to software and firmware on all types of devices, such as phones, computers, servers and routers. In its report, OCR revealed that in late 2017, researchers discovered a widespread vulnerability in nearly all of the computer processors that were sold over the past decade, affecting millions of devices. These vulnerabilities allowed malware to bypass data access controls and potentially access sensitive data, and are known as Spectre and Meltdown.
- **More Individual Records Exposed in First Six Months of 2018 than in All of 2017**
  - The number of individuals affected by the breaches has grown significantly year over year, as well. On the OCR Breach Portal, over 3.7M individual records were exposed in the first 6 months of 2018. Compare that to the 2.68M individuals affected in all of 2017. All 50 states have data breach notification laws no two exactly the same, which makes compliance with multijurisdictional incidents difficult without investing in incident response tools. These laws continue to evolve. Seven states had new or amended data breach notification laws go into effect this year alone. Four more states have signed bills that will go into effect later this year, and well over a dozen proposed and pending pieces of state legislation remain active.



**Honesty. Integrity. Accountability.**  
*It's all in our hands.*



**HEALTH CARE DISTRICT**  
**Quality, Patient Safety and Compliance Committee**  
**September 25, 2018**

**1. Description: Revised Compliance Work Plan 2018**

**2. Summary:**

Ongoing evaluation is critical to an effective compliance program. The Compliance Department will perform the reviews from the Compliance Work Plan 2018 in order to:

- Concretely demonstrate to employees and the community the District's strong commitment to honest and responsible provider and corporate conduct
- Identify and report criminal and unethical conduct
- Focus on areas of high risk and focus on any area of concern that has been identified

**3. Substantive Analysis:**

The Compliance Work Plan 2018 demonstrates areas of concern based on government enforcement trends, the OIG 2018 Work Plan, and interviews with senior management.

As part of the review process, the Compliance Department will be utilizing:

- On-site visits
- Interviews with personnel involved in management, operations, coding, claim development, patient care, and other related activities
- Reviews of medical and financial records that support claims for reimbursement
- Reviews of written materials and documentation prepared by each business line
- Monitor and trend analysis that seek deviations in specific areas

The Compliance Department will:

- Remain independent of physicians and management
- Have access to existing audit resources and relevant personnel
- Present written evaluative reports on compliance activities
- Specifically identify areas where corrective actions are needed

Based on identified concerns and changes in Business Practice, the Work Plan was revised to reflect changes in the 2018 Work Plan.

**HEALTH CARE DISTRICT**  
**Quality, Patient Safety and Compliance Committee**  
**September 25, 2018**

**4. Fiscal Analysis & Economic Impact Statement:**

	Amount	Budget	
Capital Requirements	N/A	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Annual Net Revenue	N/A	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Annual Expenditures	N/A	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Reviewed for financial accuracy and compliance with purchasing procedure:

N/A

\_\_\_\_\_  
Dawn Richards  
VP & Chief Financial Officer

**5. Reviewed/Approved by Committee:**

N/A

\_\_\_\_\_  
Committee Name

\_\_\_\_\_  
Date Approved

**6. Recommendation:**

Staff recommends the Quality, Patient Safety and Compliance Committee approve the revised 2018 Compliance Work Plan.

Approved for Legal sufficiency:

\_\_\_\_\_  
*Valene Shahrian*

Valene Shahrian  
VP & General Counsel

\_\_\_\_\_  
*Ellen Pentland*

Ellen Pentland  
Chief Compliance and Privacy Officer

\_\_\_\_\_  
*Darcy J. Davis*

Darcy J. Davis  
Chief Executive Officer



## Compliance Work Plan 2018

Compliance Auditing Plan				
Quarter	Entity	Source of Risk	Review Title	Description
1	District-Wide	Internal Risk Assessment	Privacy Walkthrough	Review of all facilities compliance with privacy laws, regulations, policies, and procedures by visual observation of day-to-day operations and services and review of forms and policy for Notice of Privacy Practices and patient requests for records in compliance with policy.
1	LMC	Internal Risk Assessment	Physician Documentation Review	Review a random sample of ED patient records for name of treating provider, progress notes, date and time of admission, discharge, and discharge disposition.
1	District-Wide	OCR Investigation	Business Associate Agreement Audit	Review policies, procedures, and internal controls for identifying and engaging business associates. Gather exhaustive list of Business Associate Agreements in preparation for potential Office for Civil Rights audit. Review a sample of business associate agreements per business unit for compliance with District policies and federal requirements.
1	Clinics and E J Healey	Internal Risk Assessment	Review Laboratory Billing	Review a sample of laboratory billings and payments to assure we have been billed and are paying for qualified patients per laboratory contracts. **This will continue into 2 <sup>nd</sup> Quarter. <b>Postponed: Working with District Cares and IT on reports.</b>
1	Clinics/LMC	Internal Risk Assessment	Clinic Adjustment from Audit	Review payment adjustments to ensure that total amounts were appropriately calculated per payer.
2	LMC and E.J. Healey	Internal Risk Assessment	Uses and Disclosures of Facility Patient Directory	Review policies, procedures, and internal controls for patient names in facility directory and compliance to policies and Privacy Rule.
2	Home Office	Internal Risk Assessment	Permitted Use and Disclosure of PHI and ePHI for other than TPO	Review policy and procedure for release of PHI and ePHI. Review a random sample monthly for each business unit in the Records Department for compliance with policy, and requested documents for what was release to assure compliance with public records requests and HIPAA.

Revised 9/6/2018



## Compliance Work Plan 2018

2	District-Wide	Internal Risk Assessment	Privacy Walkthrough	Review of a facilities compliance with privacy laws, regulations, policies, and procedures by visual observation of day-to-day operations and services.
2	District-Wide	Risk Assessment	Asset Inventory of Laptops and iPads	Review the asset inventory of devices that contain ePHI. Assess inventory to user and confirm all accounted for and correct user in possession of device.
2	LMC	Internal Risk Assessment	Review Medicare Outpatient Observation Notice (MOON)	Review a sample of Medicare and Commercial insurance records to determine if LMC is providing the written MOON and an oral explanation to patients in observation for more than 24 hours. Compliance will verify that the medical record includes documentation of the delivery of the MOON.
3	Home Office	Internal Risk Assessment	Permitted Use and Disclosure of PHI and ePHI for other than TPO	Review policy and procedure for release of PHI and ePHI. Review a random sample monthly for each business unit in the Records Department for compliance with policy, and requested documents for what was release to assure compliance with public records requests and HIPAA.
3	District-Wide	Internal Risk Assessment	Limited Data Sets and Data Use Agreements	Review compliance with Limited Data Sets and Data Use Agreements.
3	E.J. Healey	OIG Work Plan FY 2018	Skilled Nursing National Background Screening	Review the process and procedure for background screening for skilled nursing employees.
3	District-Wide	Internal Risk Assessment	Privacy Walkthrough	Review of a facilities compliance with privacy laws, regulations, policies, and procedures by visual observation of day-to-day operations and services.
3	LMC	Internal Risk Assessment	Discharge Disposition	Review policies, procedures and internal controls for hospital discharge disposition. The discharge status code assignment and the resultant post-acute care transfer payment methodology will be reviewed for financial opportunities as well as compliance risks. A sample of charts will be reviewed to determine the accuracy of hospital discharge code assignments.
3	Clinics	Internal Risk Assessment (NEW)	Athena Consents	Assess Athena processes for consent to treat and processes for other paper documents. Audit random sample of medical records between May 20 <sup>th</sup> and June 20 <sup>th</sup> 2018 to determine compliance with consents to treat.

Revised 9/6/2018



## Compliance Work Plan 2018

3	District-Wide	OIG Work Plan 2018	Controls over Opioid Treatment Programs	Review policies and procedures for Health Care District controls over Opioids
4	Aeromedical	Internal Risk Assessment	Billing Audit	Review procedures, internal controls, and sample all payors for Aeromedical billing. <b>(Postponed, billing now outsourced. Policies and procedures are still in progress. Moved to first quarter 2019).</b>
4	District-wide	OIG WorkPlan 2018	Physician Professional Services and Medical Director	Review all HCD and Affiliate Physician Professional Services and Medical Director agreements and documentation supporting payment per the agreements. This audit has been started in the fourth quarter; however, due to volume of information and new audit priority it will continue into first quarter 2019 until complete.
4	District-Wide	Internal Risk Assessment	Privacy Walkthrough	Review of a facilities compliance with privacy laws, regulations, policies, and procedures by visual observation of day-to-day operations and services.
4	District-Wide	Internal Risk Assessment	Minimum Necessary request for PHI	Review policies and procedures related to minimum necessary request and evaluate the content to the specified criteria. Review requests made on a routine and recurring basis and determine if they are limited to the PHI reasonably necessary to achieve the purpose of the disclosure.
4	LMC	Internal Risk Assessment	Financial Assistance Policy	Review LMC's Financial Assistance Policy to determine if it meets the requirements of 501(r). <b>Moved to fourth quarter per Dawn Richards' (CFO) request due to IRS audit. 8/2/18 at the request of CFO moved to first quarter, 2019.</b>
4	District-Wide	Internal Risk Assessment	Volunteer, Student and Resident Onboarding Process Review	Review of procedures to ensure proper onboarding including required training, background checks, and paperwork. Review a sample of documentation to ensure compliance with requirements. <b>Moved to fourth quarter per Karen Harris VP of Field Operations.</b>
4	Clinics	Internal Risk Assessment (NEW)	Referral Clerk Record Audit	Review patient records processed and scanned by CLBPCC referral clerk staff to AthenaHealth EHR and determine charts containing wrong patient information. This audit will be ongoing until completed and assessment of any regulatory issues.

## Compliance Work Plan 2018

### Compliance Monitoring Plan

The purpose of the Compliance Monitoring Plan is to:

1. Review claims on a retrospective and concurrent basis to ensure the accuracy, integrity and consistency of billings for a sample of Medicare, Medicaid and other third party payor claims;
2. Ensure sampled claims meet state and federal requirements, national coding standards and other regulatory rules, payor contract terms, regulations and requirements.
3. Ensure that all charges reported for claim and billing purposes are supported by appropriate documentation in the medical record.
4. Review claims and related records to identify potential under and over payments.

Entity	Key Measurements	Description
<b>LMC</b>	DRG validation, Medical Necessity, Coding Validation; Chart to Bill Audits; Modifier Usage; Claims Error Rates	Review a total of at least thirty (30) charts during the first quarter of FY2018. Education occurred after audit. Audit was completed by ATOS prior to January 26, 2018.
<b>CLINICS/ DENTAL</b>	Coding Validation; Professional Fee Audits; Diagnosis Accuracy; Chart to Bill Audits; Modifier Usage; Claims Error Rates	Perform a baseline audit during the first quarter of Medical providers, which will review a total of fifteen (15) charts per provider. Provider education was completed January 4, 2018. Additional Audits to be completed by Acevedo Consulting in the first quarter of 2019. A Dental Auditor to be determined.
<b>HEALEY</b>	Coding Validation, Chart to Bill Audits; Diagnosis Sequencing; MDS Measures	Completed first quarter 2018.



## Compliance Work Plan 2018

<b>HCD ALL BUSINESS UNITS</b>	Office of Civil Rights (OCR) HIPAA Risk Assessment	Audit completed by SecureState.
<b>LMC</b>	LMC ED Facility Audit	Acevedo Consulting completed an Emergency Department (ED) audit for facility charges in the fourth quarter. Education to be completed in the same quarter.
<b>HCD</b>	Mock Tabletop IT Security Incident Response Plan Drill	Test our IT Security Incident Response Plan in conjunction with SecureState in a tabletop drill in third quarter 2018.

All audits in the 2018 Audit Work Plan are subject to change due to Compliance issues raised and requiring audit/investigation during quarter. The Office of Inspector General (OIG) 2018 Work Plan is a dynamic changing document that is updated by the OIG monthly. All new items identified by the OIG as identified as a risk for HCD, these will be incorporated into the Work Plan.