

QUALITY, PATIENT SAFETY & COMPLIANCE COMMITTEE MEETING AGENDA September 26, 2024 at 2:00PM 1515 North Flagler Drive, Suite 101 West Palm Beach, FL 33401

Remote Participation Link: https://zoom.us/j/5507895592?pwd=REZ4TWtYUXowQWNpWTBaVXRsZldDQT09

Telephone Dial-In Access: 646-558-8656 | Meeting ID: 550 789 5592 | Passcode: 946503

1. Call to Order

- A. Roll Call
- B. Affirmation of Mission: The mission of the Health Care District of Palm Beach County is to be the health care safety net for Palm Beach County. Our vision is meeting changes in health care to keep our community healthy.

2. Agenda Approval

- A. Additions/Deletions/Substitutions
- B. Motion to Approve Agenda
- 3. Awards, Introductions and Presentations
- 4. Disclosure of Voting Conflict
- 5. Public Comment
- 6. Meeting Minutes
 - A. <u>Staff recommends a MOTION TO APPROVE:</u>

Committee Meeting Minutes of June 12, 2024. [Pages 1-4]

7. Consent Agenda- Motion to Approve Consent Agenda Items

A. **ADMINISTRATION**

7A-1 **RECEIVE AND FILE:**

September 2024 Internet Posting of District Public Meeting.

https://www.hcdpbc.org/EventViewTrainingDetails.aspx?Bck=Y&EventID=436&m=0|0&DisplayType=C

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

Committee Attendance. [Page 5]

B. **PATIENT RELATIONS DASHBOARDS**

7B-1 **RECEIVE AND FILE:**

Patient Relations Dashboards (Dr. Belma Andric) [Pages 6-8]

- Patient Relations Dashboard, School Health.
 (Alexa Goodwin/ Fe Pagtakhan) [Page 9]
- Patient Relations Dashboard, Community Health Centers.
 (Alexa Goodwin/ Joe-Ann Reynolds) [Page 10]
- Patient Relations Dashboard, E. J. Healey Center.
 (Alexa Goodwin) [Page 11]
- Patient Relations Dashboard, Lakeside Medical Center.
 (Alexa Goodwin/ Joe-Ann Reynolds) [Page 12]
- Patient Relations Dashboard, Pharmacy.
 (Alexa Goodwin/ Joe-Ann Reynolds) [Page 13]

C. **PRODUCTIVITY DASHBOARDS**

7C-1 **RECEIVE AND FILE:**

Productivity Dashboards (Dr. Belma Andric) [Pages 14-17]

Productivity Dashboard, School Health.
 (Fe Pagtakhan) [Page 18]

- Productivity Dashboard, Community Health Centers.
 (Dr. Ana Ferwerda) [Page 19]
- Productivity Dashboard, E. J. Healey Center.
 (Shelly Ann Lau/ Terretha Smith) [Page 20]
- Productivity Dashboard, Lakeside Medical Center.
 (Janet Moreland/ Sylvia Hall) [Pages 21-22]
- Productivity Dashboard, Ground Transportation.
 (Lisa Azzaro) [Page 23]
- Productivity Dashboard, Pharmacy (Louis Bassi) [Page 24]
- Productivity Dashboard Human Resources
 (Geoff Washburn/Christina Schiller) [Page 25]

8. Regular Agenda

A. **COMPLIANCE**

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

Compliance, Privacy and Ethics Program Activities and Updates (Heather Bokor) [Pages 26-42]

B. **CORPORATE QUALITY DASHBOARDS**

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

Quality & Patient Safety Dashboards (Dr. Belma Andric) [Pages 43-50]

- Quality & Patient Safety Report, School Health.
 (Steven Sadiku/Fe Pagtakhan) [Page 51]
- Quality & Patient Safety Report, Aeromedical.
 (Steven Sadiku/Jostein Lavoll) [Page 52-53]
- Quality & Patient Safety Report, Trauma.
 (Steven Sadiku/Joel Rosales) [Pages 54-55]

- Quality & Patient Safety Report, Community Health Centers (Steven Sadiku/Dr. Ana Ferwerda) [Page 56]
- Quality & Patient Safety Report, E. J. Healey Center.
 (Steven Sadiku/Sonja Susnjevic) [Pages 57-58]
- Quality & Patient Safety Report, Lakeside Medical Center.
 (Steven Sadiku/ Sylvia Hall) [Page 59]
- Quality & Patient Safety Report, Ground Transportation.
 (Steven Sadiku/ Amaury Hernandez) [Page 60-61]
- Quality & Patient Safety Report, Pharmacy (Louis Bassi) [Page 62]
- Quality & Patient Safety Report, Corporate Quality Metrics.
 (Steven Sadiku) [Pages 63-65]

C. **RISK MANAGEMENT DASHBOARDS**

8C-1 RECEIVE AND FILE:

Risk Management Updates and Dashboards (Heather Bokor) [Pages 66-75]

9. CEO Comments

10. Committee Member Comments

11. Upcoming Meetings

December 11, 2024

10:00AM, Quality, Patient Safety and Compliance Committee

12. Motion to Adjourn

WE CARE FOR ALL

QUALITY, PATIENT SAFETY & COMPLIANCE COMMITTEE SUMMARY MEETING MINUTES June 12, 2024 at 12:00PM 1515 North Flagler Drive, Suite 101 West Palm Beach, FL 33401

1. Call to Order

Tracy Caruso called the meeting to order.

A. Roll Call

Committee Members present: Tracy Caruso, Chair; Dr. Alina Alonso, Kimberly Schulz; Tammy Jackson-Moore, (REMOTE); Dr. Jyothi Gunta; William Johnson (REMOTE) and Dr. Luis Perezalonso (REMOTE). Dr. LaTanya McNeal was absent.

Staff present: Darcy Davis, Chief Executive Officer; Bernabe Icaza, SVP & General Counsel; Heather Bokor, VP & Chief Compliance, Privacy and Risk Officer; Belma Andric, SVP & Chief Medical Officer; Candice Abbott, SVP & Chief Operating Officer; Geoff Washburn, VP & Chief Human Resources Officer; Jessica Cafarelli, VP & Chief Financial Officer; and Regina All, SVP & Chief Nursing Officer.

Recording/ Transcribing Secretary: Heidi Bromley

B. Affirmation of Mission: The mission of the Health Care District of Palm Beach County is to be the health care safety net for Palm Beach County. Our vision is meeting changes in health care to keep our community healthy.

2. Agenda Approval

- A. Additions/Deletions/Substitutions
- B. Motion to Approve Agenda

CONCLUSION/ACTION: Tammy Jackson-Moore made a motion to approve the agenda. The motion was duly seconded by Dr. Gunta. There being no opposition, the motion passed unanimously. Quality, Patient Safety and Compliance Committee Summary Meeting Minutes June 12, 2024

3. Awards, Introductions and Presentations

A. Trauma Agency Update.

Dr. Andric provided the committee with a Trauma Agency Update.

4. Disclosure of Voting Conflict

5. Public Comment

6. Meeting Minutes

A. Staff recommends a MOTION TO APPROVE:

Committee Meeting Minutes of March 13, 2024.

CONCLUSION/ACTION: Kimberly Schultz made a motion to approve the Committee Meeting Minutes of March 13, 2024. The motion was duly seconded by Dr. Gunta. There being no opposition, the motion passed unanimously.

7. Consent Agenda- Motion to Approve Consent Agenda Items

CONCLUSION/ACTION: Dr. Alonso made a motion to approve the Consent Agenda. The motion was duly seconded by Dr. Gunta. There being no opposition, the motion passed unanimously.

A. **ADMINISTRATION**

7A-1 **RECEIVE AND FILE:**

June 2024 Internet Posting of District Public Meeting.

https://www.hcdpbc.org/EventViewTrainingDetails.aspx?Bck=Y&EventID=436&
m=0|0&DisplayType=C

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

Committee Attendance

B. **PATIENT RELATIONS DASHBOARDS**

7B-1 **RECEIVE AND FILE:**

Patient Relations Dashboards

Patient Relations Dashboard, School Health

Quality, Patient Safety and Compliance Committee Summary Meeting Minutes June 12, 2024

7. Consent Agenda (Continued)

- Patient Relations Dashboard, C. L. Brumback Primary Care Clinics
- Patient Relations Dashboard, E. J. Healey Center
- Patient Relations Dashboard, Lakeside Medical Center
- Patient Relations Dashboard, Pharmacy

C. **PRODUCTIVITY DASHBOARDS**

7C-1 **RECEIVE AND FILE:**

Productivity Dashboards

- Productivity Dashboard, School Health
- Productivity Dashboard, C. L. Brumback Primary Care Clinics
- Productivity Dashboard, E. J. Healey Center
- Productivity Dashboard, Lakeside Medical Center
- Productivity Dashboard, LifeTrans Ground Transportation
- Productivity Dashboard Human Resources

8. Regular Agenda

A. **COMPLIANCE**

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

Compliance, Privacy and Ethics Program Activities and Updates

Ms. Bokor reviewed the Compliance, Privacy and Ethics Activities and provided updates to the Committee.

CONCLUSION/ACTION: Received and filed.

B. **CORPORATE QUALITY DASHBOARDS**

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

Quality & Patient Safety Reports

- Quality & Patient Safety Report, School Health
- Quality & Patient Safety Report, Aeromedical
- Quality & Patient Safety Report, Trauma
- Quality & Patient Safety Report, C. L. Brumback Primary Care Clinics
- Quality & Patient Safety Report, E. J. Healey Center
- Quality & Patient Safety Report, Lakeside Medical Center

Quality, Patient Safety and Compliance Committee Summary Meeting Minutes June 12, 2024

- Quality & Patient Safety Report, LifeTrans Ground Transportation
- Quality & Patient Safety Report, Corporate Quality Metrics

Mr. Sadiku reviewed and discussed all of the Corporate Quality Dashboards.

CONCLUSION/ACTION: Received and filed.

- 9. CEO Comments
- 10. Committee Member Comments
- 11. Establishment of Upcoming Meetings

September 26, 2024

• 2:00PM, Quality, Patient Safety and Compliance Committee

December 11, 2024

- 10:00AM, Quality, Patient Safety and Compliance Committee
- 12. Motion to Adjourn Public Meeting Immediately Following the Conclusion of the Closed Meeting
- 13. Closed Meeting: Risk and Peer Review [Under Separate Cover]

Pursuant to Florida Statute Ch. 768.28, 395.0197, 766.101 and 400.119, 400.147 and 395.0193.

14. Motion to Adjourn

		_
Tracy Caruso, Chair	Date	-



Attendance Tracking for 2024

	3/13/24	6/12/24	9/26/24	12/11/24
Dr. Jyothi Gunta	Х	X		
Tracy Caruso	Х	Х		
Dr. Alina Alonso	Х	Х		
Tammy Jackson-Moore	REMOTE	REMOTE		
Dr. Luis Perezalonso	ABSENT	REMOTE	N/A	N/A
Kimberly Schulz	Х	X		
Dr. LaTanya McNeal	ABSENT	ABSENT		
William Johnson	Х	REMOTE		
Dr. Ishan Gunawardene	N/A	N/A		



1. Description: Patient Relations Dashboards

2. Summary:

This agenda item provides the patient relations dashboard for the 2nd Quarter of 2024 for School Health, Community Health Centers, Skilled Nursing Center, Lakeside Medical Center, and Pharmacy.

3. Substantive Analysis:

School Health

For Quarter 2, 2024, School Health had a total of 16 Patient Relations events reported for 169 school locations. Of the 16 patient relations events, 6 were complaints, 10 were compliments, and there were no grievances. All 6 complaints were made by family members. The complaint categories were nurse-related in all aspects of care, communication, and care and treatment. The 10 compliments recognized the School Health Nurses and School Health Nurse Assistants received from principals, school district staff, family members, and employees.

Community Health Centers

For Quarter 2 2024, there were a total of 26 Patient Relations Occurrences that occurred between 7 Centers and Community Health Center Administration. This was an increase from the previous quarter where we had a total of 24 Complaints and Grievances. Of the 26 occurrences, there were 5 Grievances and 21 Complaints. The top 5 categories were Respect, Communication,

Physician, Referral, Care & Treatment and Finance Related issues. The top subcategories were Poor Communication and Physician Related All Aspects of Care with 4 occurrences in each.

There were also 56 Compliments received across 7 Centers, Mobile Warrior, and Center Administration. Of the 56 Compliments, 50 were patient compliments, and 6 were employee-to-employee "Thumbs-Up" compliments.

Skilled Nursing Center

For Quarter 2 2024, there were a total of 34 Patient Relations Occurrences received across 4 resident units (Starfish, Dolphin, Pelican, Sand Dollar), Laundry, Dietary, Administration, Facilities, Social Services, Finance, and Therapy. This was a decrease



from the previous quarter where we had 42 Patient Relations occurrences. Of the 34 occurrences, there were 2 Grievances and 32 Complaints. The top 5 categories were Personal Belongings, Care & Treatment, Nutrition, Communication, Environmental, Finance, and Nursing-related issues. The top subcategory was Personal Belongings – Clothes with 9 occurrences reported.

There were also a total of 67 Compliments received across 5 resident units (Pelican, Manatee, Starfish, Sand Dollar, Dolphin), Activities, Rehab, Dietary, Finance, and Therapy. Of the 67 Compliments, 32 were Nursing Related, 2 Nutrition Related, 2 Administration Related and 31 Clinical Support Staff Related.

Lakeside Medical Center

For Quarter 2 2024, there were a total of 9 Patient Relations Occurrences that occurred between Emergency Services, Admissions and Radiology. Of the 9 occurrences, there were 2 Grievances and 7 Complaints. The top 5 categories were Care & Treatment, Nursing, Respect, Physician Related, Personal Belongings and Admitting/Registration. The top subcategory was Confidence in Care Givers with 2 occurrences.

There was also 1 Compliment received in the Emergency Services department for a physician.

Pharmacy

For Quarter 2 2024, there was a total of 1 Patient Relations Occurrences that occurred at the Delray Pharmacy. This was a decrease from the previous quarter where we had a total of 4 Complaints and Grievances. The 1 occurrence was a grievance related to communication.

There were no compliments received for Pharmacy in Q2 2024.

4. Fiscal Analysis & Economic Impact Statement:

	Current FY Amounts	Total Amounts (Current + Future)	Budget
Capital Requirements	N/A		Yes No 🖂
Net Operating Impact	N/A		Yes No 🔀

^{*}Non-budgeted expenditures in excess of \$250,000 require Finance and Audit Committee review and Board approval. Reviewed for financial accuracy and compliance with purchasing procedure:



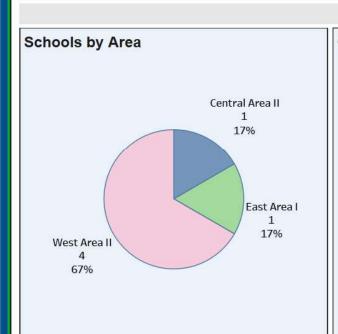
	N/A	
	Jessica Cafarelli	
	VP & Chief Financial Officer	
5.	Reviewed/Approved by Committee:	
	N/A	N/A
	Committee Name	Date Approved
6.	Recommendation:	
	Staff recommends the Committee Receiv	e and File the Patient Relations Dashboards.
	Approved for Legal sufficiency:	
	— DocuSigned by:	
	Bernade Icaza	
	OCF6F7DB6 Bernabe Icaza	
	SVP & General Counsel	
	DocuSigned by:	Signed by:
	Belma Andric	Darcy Davis
	1F272D3 Beirma Andric, MD	77A3B35FCV47J.: Davis
	SVP & Chief Medical Officer	Chief Executive Officer

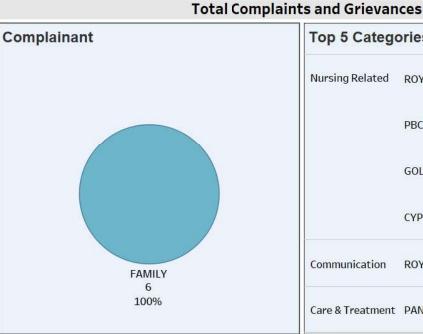
Patient Relations School Health (Grievances, Complaints & Compliments) - 4/1/2024 to 6/30/2024

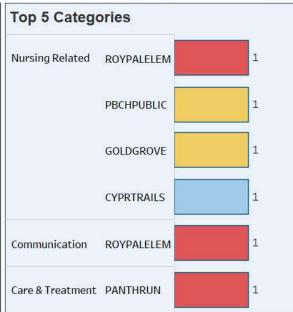




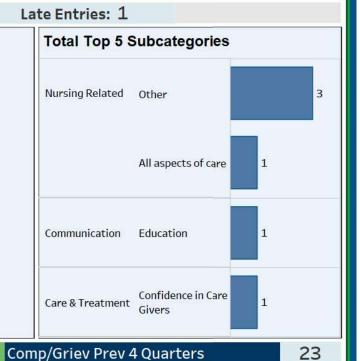
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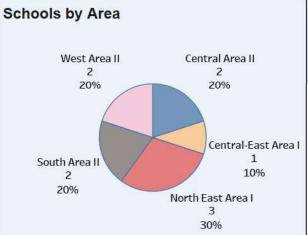


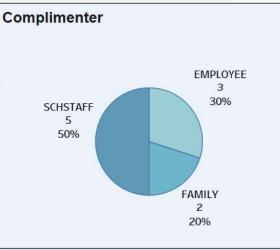


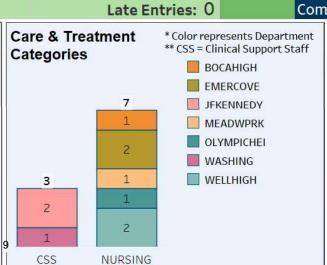
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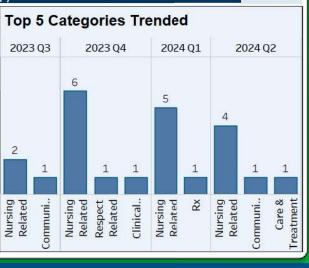






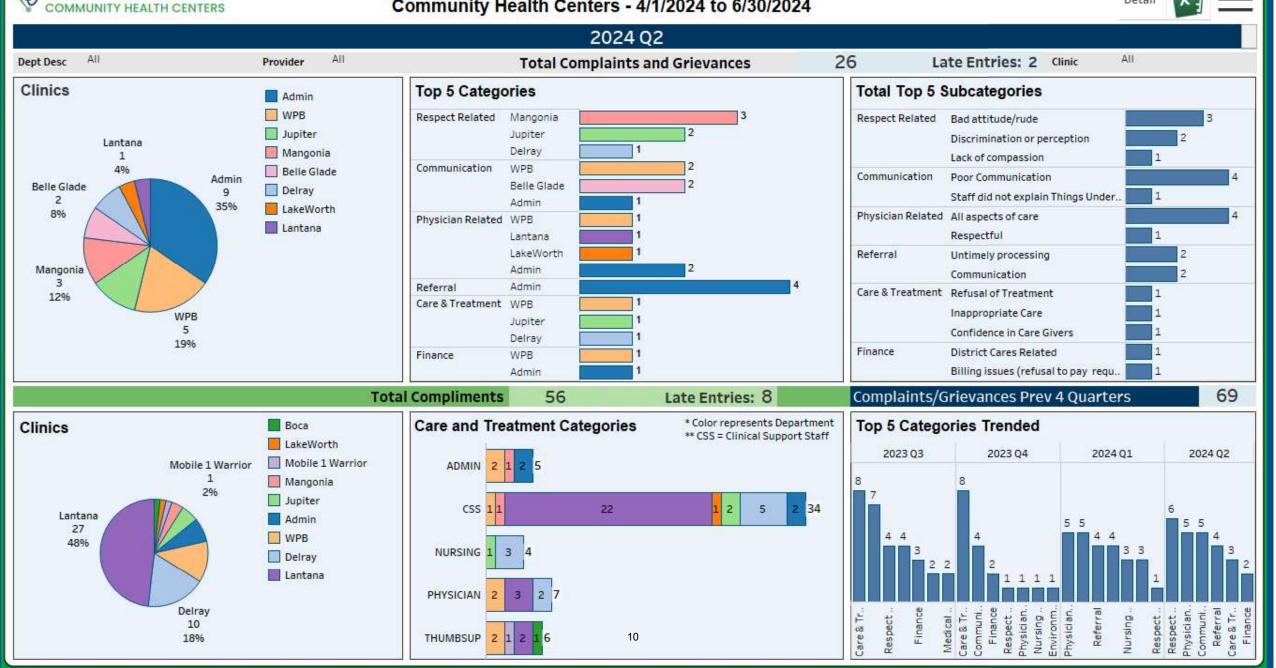






Community Health Centers - 4/1/2024 to 6/30/2024

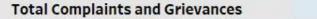




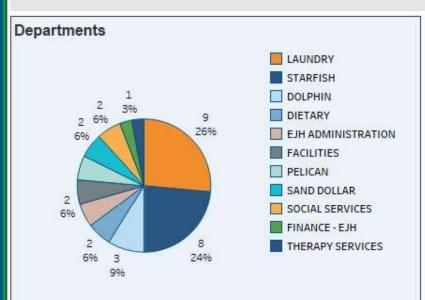
Patient Relations (Grievances, Complaints & Compliments) Healey Center - 4/1/2024 to 6/30/2024

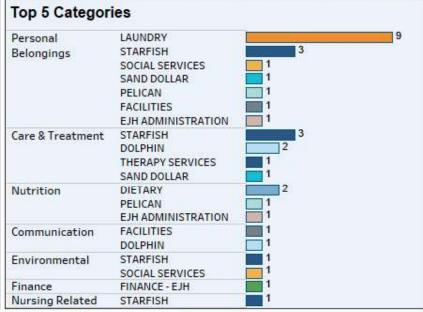


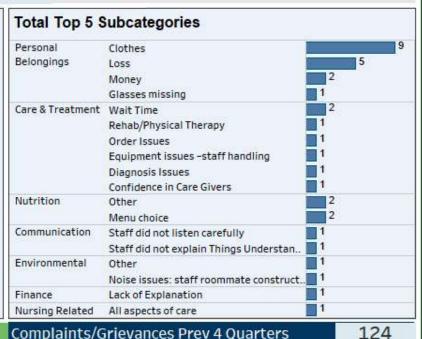






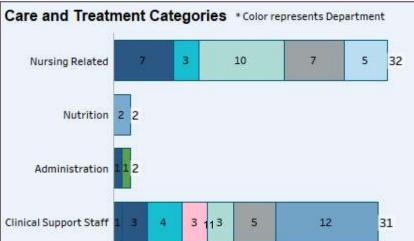




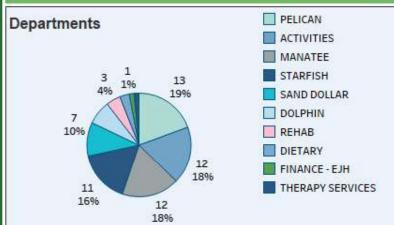


Total Compliments





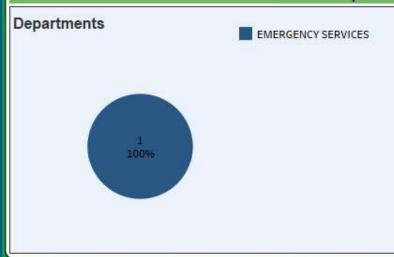


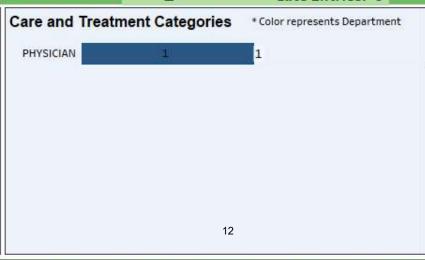


Patient Relations (Grievances, Complaints & Compliments) Lakeside Medical Center - 4/1/2024 to 6/30/2024







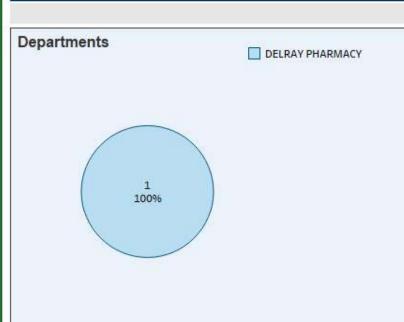




Docusign Envelope ID: ECD33A09-8C6E-4031-9650-2B7E728BC304 [(9)] Health Care District Patient Relations (Grievances, Complaints & Compliments)



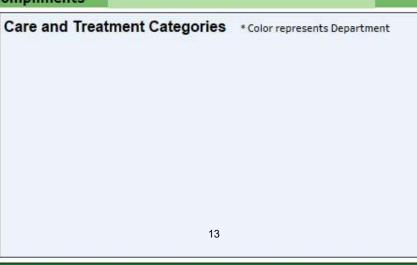
















1. Description: Productivity Dashboards

2. Summary:

This agenda item provides the productivity reports for the 2nd Quarter of 2024 for School Health, Community Health Centers, Skilled Nursing Center, Lakeside Medical Center, Ground Transportation, Pharmacy, and Human Resources.

3. Substantive Analysis:

School Health

In the 2nd Quarter of 2024, we completed a total of 199,271 events across 169 schools, providing care for a total of 73,765 students. These events were broken down into 60,695 consultation events, 59,036 office visits, 45,378 procedure visits, 32,914 medication visits, and 1,248 record reviews. The top 3 schools with the most events are Elbridge Gale Elementary School, Verde K-8, and Everglades Elementary School.

Community Health Centers

In Q2 of 2024, the clinics served 21,431 unique patients (a 1% increase from the previous quarter) and provided 42,619 clinic visits (a 2% decrease from the previous quarter). The top 3 departments with the highest patient visits were Lantana Primary, West Palm Beach Primary, and West Palm Beach Dental.

Skilled Nursing Center

In Q2 of 2024, the average census for the Healey Center was 105. There were 45,469 treatments performed and 240,744 medications administered by nursing. Food and nutrition services provided a total of 24,547 resident meals. CNA POC documentation compliance rate for day shift averaged 99%, evening shift averaged 98.9% and night shift averaged 99.1%. The therapy department completed a total of 3,129 units for the quarter.

Lakeside Medical Center

The productivity data report for 2nd Quarter 2024 represents the following detailed information:



- **Total Census Days by Level of Care** There was a total of 1,273 patient days for Q2-2024 compared to 1,437 for Q1-2024 resulting in an 11.4 % decrease.
- **Emergency Services Visits** There were a total of 5,180 visits for Q2-2024 compared to 5,250 for Q1-2024, resulting in a 1.3 % decrease.
- Physical Therapy Visits (Evaluations and Treatments) There were a total of 187 evaluations and treatments in Q2-2024 compared to 213 for Q1-2024, resulting in a 12% decrease.
- Inpatient Admissions There were a total of 99 Inpatient Admissions for Q2 2024 compared to 110 for Q1-2024 resulting in a 10% decrease.
- **Surgical Cases** There were a total of 63 surgical cases performed in Q2-2024 compared to 46 for Q1-2024 resulting in a 36.9% increase.
- Medication Administration –There was a total of 37,119 medications were administered in Q2-2024 compared to 39,919 for Q1-2024 resulting in a 7% decrease.
- Radiology Exams Completed There were a total of 6,592 radiological exams performed for Q2-2024 compared to 6,987 for Q1-2024 resulting in a 5.6% decrease.
- Laboratory Specimens Collected There were a total of 20,108 lab specimens collected for Q2-2024 compared to 21,921 for Q1-2024 resulting in an 8.2% decrease.

Ground Transportation

For Q2 2024, the Ground Transportation department performed 522 transports (524 previous quarter), with 495 (95%) originating at Lakeside Medical Center. Most of the patients transported were between 21 and 80 years old, with the 71-80 group being the highest. The top 3 diagnoses for the patients transported during this period were unspecified convulsions, non-ST elevation myocardial infarction, and pneumonia. The top 3 destinations were Palms West Hospital, followed by JFK Main and St. Mary's

Medical Center. The top 3 services not available were neurology, cardiology, and gastroenterology. There was a total of 28 canceled transports, 54% of which were from the referring location and there were 15 transports in which lights/sirens were used.

Pharmacy

For Quarter 2 2024, HCD Pharmacies filled 44,095 prescriptions for 7,387 unique patients, a 9% increase compared to Q1. 14% of the patients serviced were new to pharmacy in Q2, 1,850 packages were mailed during the quarter containing 4,490 prescriptions, which was 10% of total prescriptions dispensed. In addition, 1,102 Narcan units were distributed to the community in this time frame.

Human Resources

o For Q2 2024, our employee headcount reached 1,259, a 1.4% decrease from the previous quarter (1277).

FT=1,181

PT=27

PD=51

- Clinical job functions/positions are the leading with 46%, followed by technical at 14% and specialist at 9%.
- Q2 2024, the diversity headcount is 45% African American, 27% White, 16%
 Hispanic, and 12% Other; 78% of the workforce is female.
- Q2 2024, the average age of employees is 47 years old, with 200 employees projected to be within retirement age in the next 5 years.

4. Fiscal Analysis & Economic Impact Statement:

	Current FY Amounts	Total Amounts (Current + Future)	Budget
Capital Requirements	N/A		Yes No 🔀
Net Operating Impact	N/A		Yes 🗌 No 🔀

^{*}Non-budgeted expenditures in excess of \$250,000 require Finance and Audit Committee review and Board approval. Reviewed for financial accuracy and compliance with purchasing procedure:

N/A	
Jessica Cafarelli	
VP & Chief Financial Officer	



Reviewed/Approved by Committee:	
N/A	N/A
Committee Name	Date Approved
Recommendation:	
Staff recommends the Committee Receiv	e and File the Productivity Dashboards.
Approved for Legal sufficiency: Servate Icaza OCF6F7DBBBHHAabe Icaza SVP & General Counsel	
Bulma lindric 152720 Bedfin 145 Andric, MD	Signed by: David Davis 77/ADPORPEN/14J7: Davis Chief Executive Officer
	N/A Committee Name Recommendation: Staff recommends the Committee Receiv Approved for Legal sufficiency: Burnale Icaza SVP & General Counsel Docusigned by: Burnale Mulric



School Health Room Overview

Procedure

Medications

Review

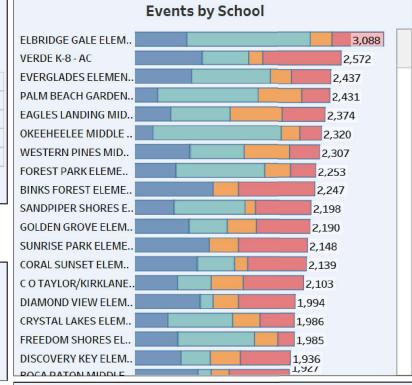
Visit

Consultation

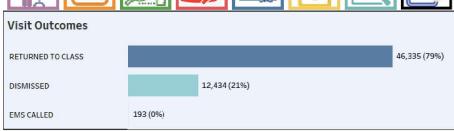




Activity Summary							
Event Type	# Events	#Schools	# Students	# Providers	Avg Dur Min		
Consultation	60,695	169	33,738	219	328.80		
Visit	59,036	169	37,441	216	196.02		
Procedure	45,378	111	. 223	154	9.66		
Medications	32,914	163	1,115	211	5.72		
Review	1,248	35	1,248	36	45.38		

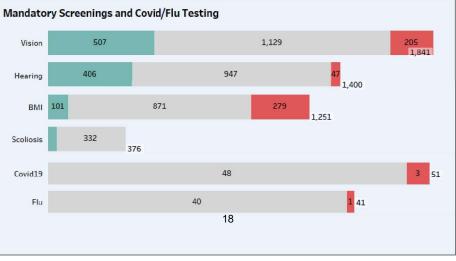




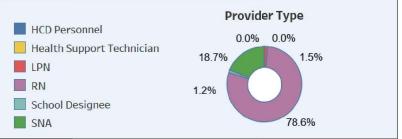


					# Stu	ıdent	s by G	irade					
891	4,200	4,515	4,780	4,936	4,677	3,695	3,435	3,044	2,304	1,589	1,317	947	54
PK	KG	1st	2nd	3rd	4th	5th	6th	7th	8th	9th	10th	11th	12th

五 건	N KG	1st 2nd	3rd	4th	oth 6th	7th	8th	10th	11th
lexi	ible								
W I 1,765 0.9%	SE I 4,008 2.0%	S I 3,589 1.8%	NE I 2,446 1.2%	N I 4,601 2.3%	E I 3,452 1.7%	CW I 3,064 1.5%	CN I 3,886 2.0%	CE I 5,140 2.6%	The second second
Star	ndard								
25	W II 5,088 2.7%	SC II 26,949 13.6%		S II 30,248 15.3%		N II 25,270 12.8%	E II 27,48 13.99		C II 27,836 14.1%







AII

Clinic visit types, Trends & Different Service Utilization 4/1/2024 to 6/30/2024





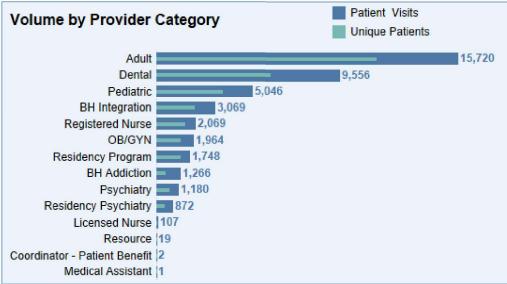
Unique Patient Patients Visits

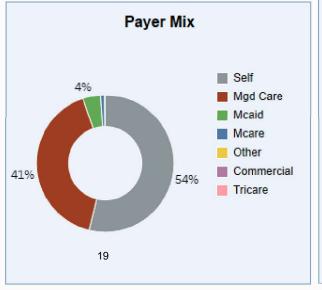


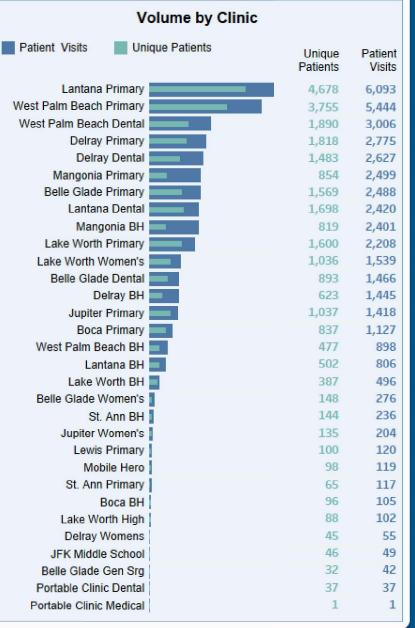








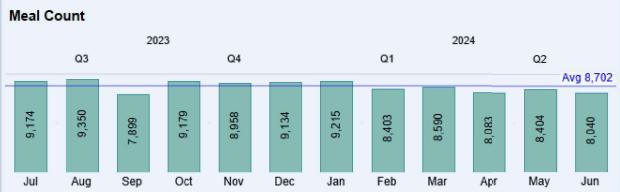


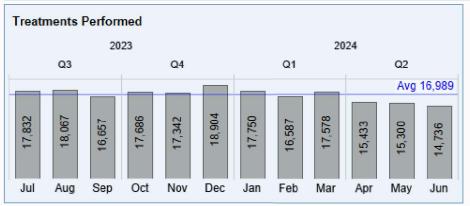


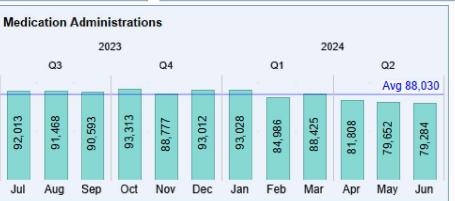


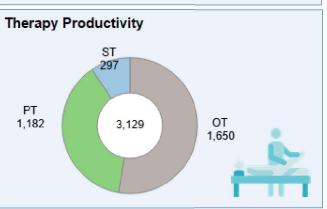
Healey Center Productivity Data Q2 2024

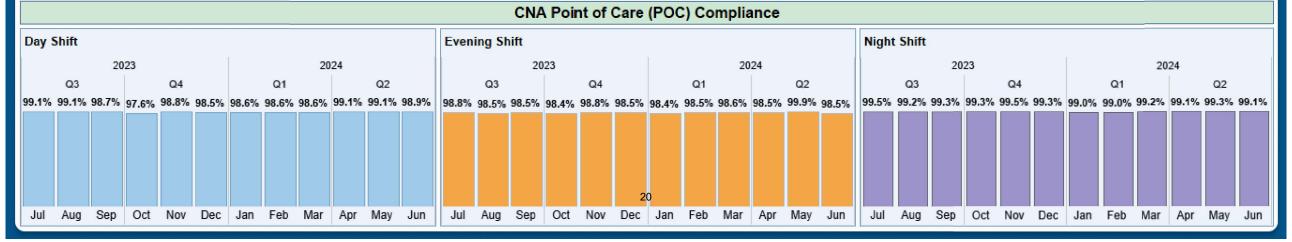




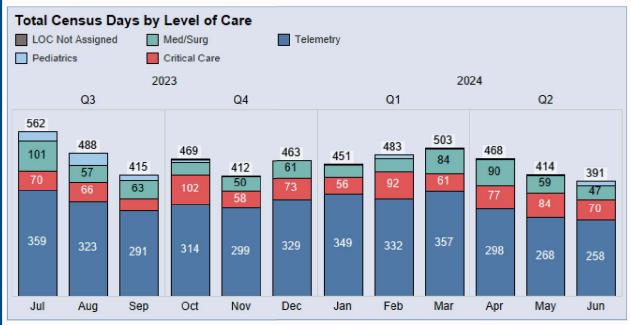




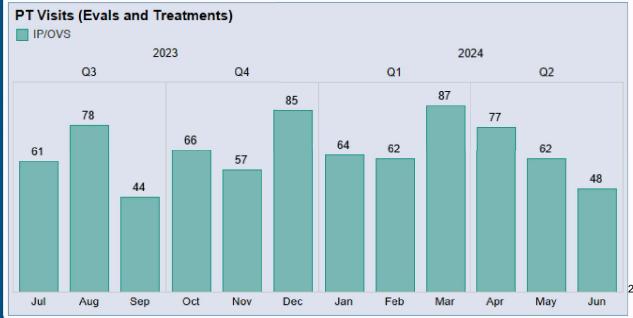




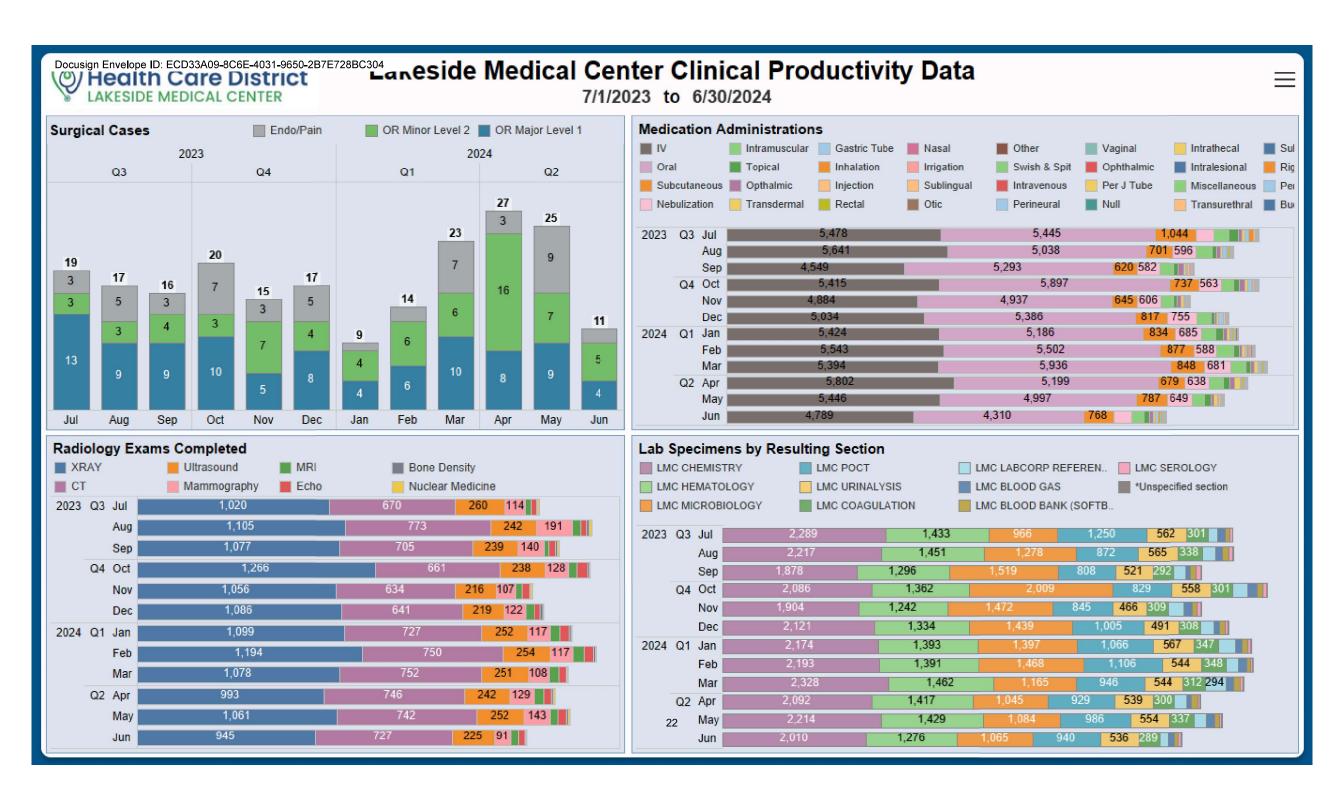


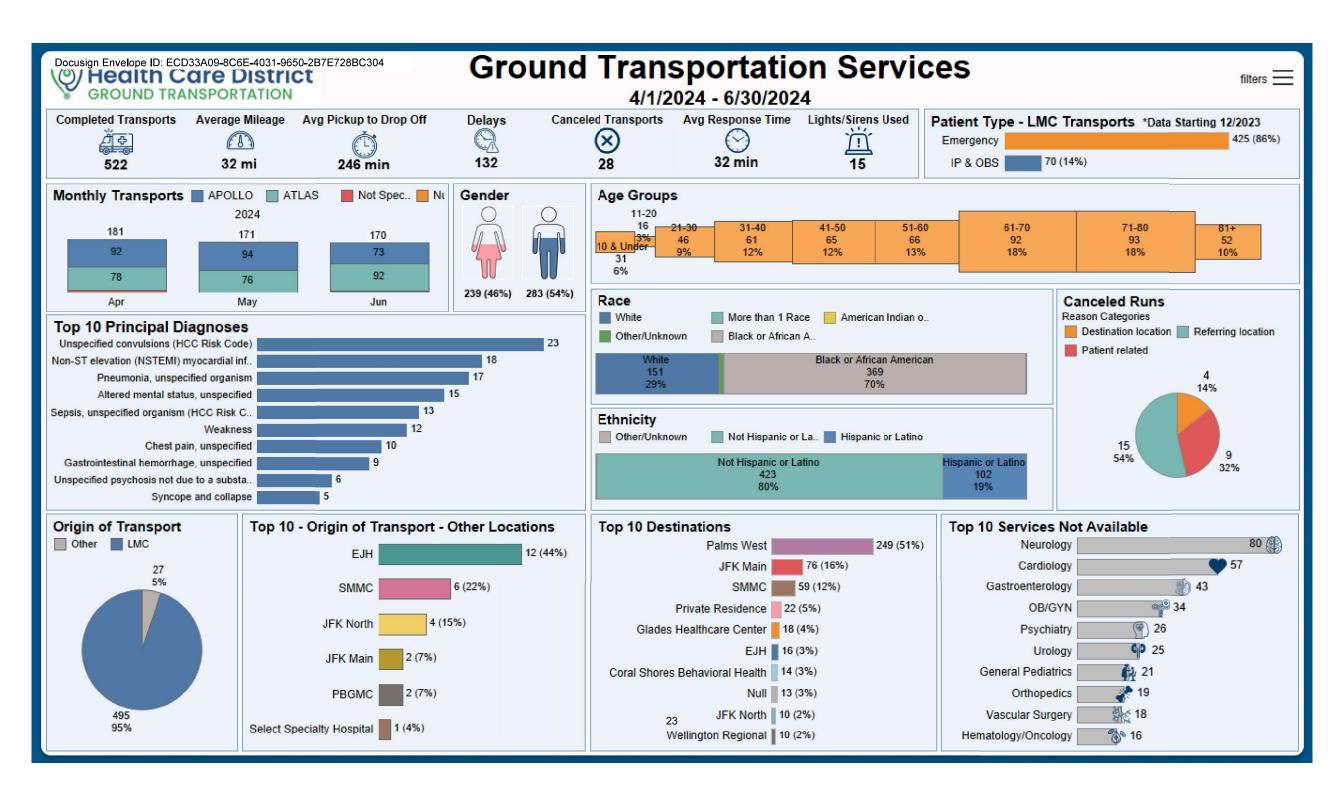












2024-06

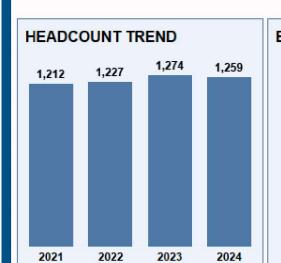
© 2024 Mapbox © OpenStreetMap

7.501 Rx Sold

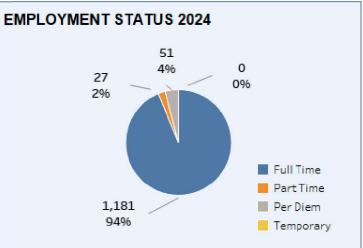
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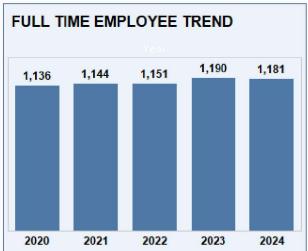
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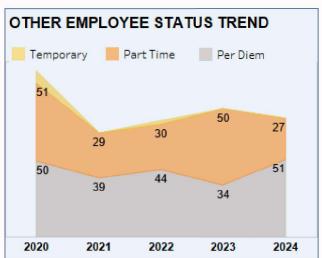
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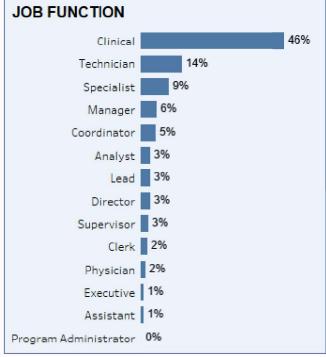


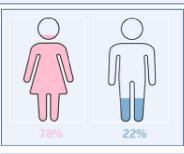
OF PALM BEACH COUNTY



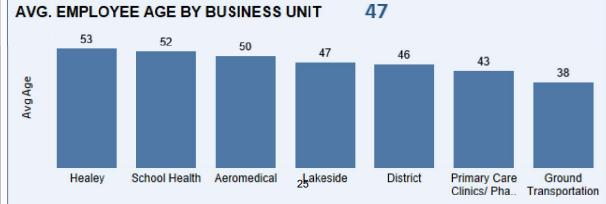
















1. Description: HCD Compliance, Privacy, and Ethics Program Updates and Activities Quarterly Report (FY24 Q3)

2. Summary:

A summary of the Health Care District's ("HCD") Compliance, Privacy, and Ethics Program ("Compliance", "CPE", or "Program") activities since the last meeting is provided. This Report covers FY24 Q3 (April 1 – June 30, 2024).

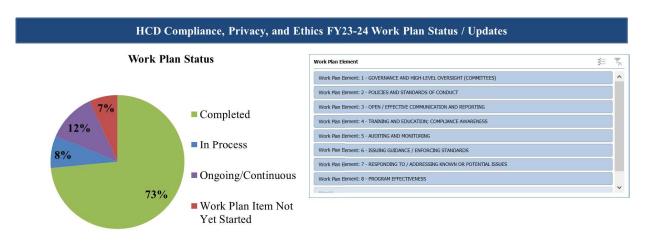
The Office of Inspector General ("OIG") recommends reporting on a regular basis to the governing body, CEO, and compliance committee(s) regarding the planning, implementing, and monitoring of the Program. This report is intended to provide an update on CPE activities, initiatives, monitoring, statistics, and Work Plan. Heather Bokor, VP / Chief Compliance, Privacy, & Risk Officer, presents the following:

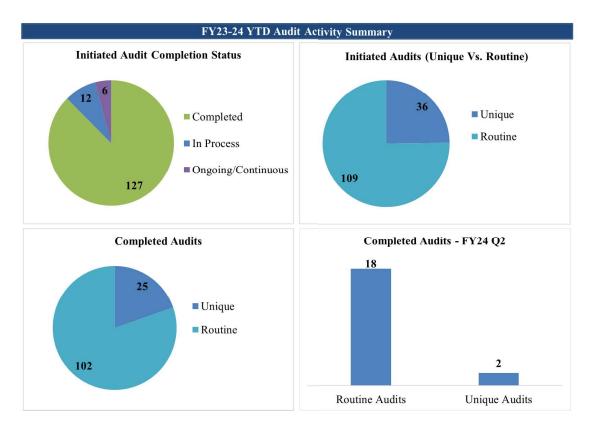
3. Substantive Analysis: Compliance, Privacy, and Ethics Report

CPE continually assesses HCD and develops the Program to address areas for attention and/or enhancement, in order to ensure that through the Work Plan and other activities, we meet or exceed Effective Compliance Program Elements, per OIG.

Key areas since the last report which have had significant or notable work under or separate from the FY23-24 Work Plan include: Issuing guidance to staff; Internal auditing and monitoring/reviews/risk assessments; External audit and monitoring assistance/participation; Policies and Procedures; Cybersecurity/Data Privacy and Privacy incident readiness and response, including assessments, and third-party management; Interdepartmental IT Security and Privacy P&P reviews and revisions; Training, Education & Awareness/Survey Activities; Contract reviews and payments with physicians/external parties; Physician Provider Enrollment/Billing research and guidance, Technology/Data Governance/Artificial Intelligence (AI); Conflicts of Interest (COI); Consents and forms; Licensure and accreditation; Research and issuance of guidance, education/information to staff; Behavioral Health; Regulatory updates/industry enforcement activity, new/proposed state laws; Active participation and responsiveness to HCD staff on inquiries/incidents/needs; and other initiatives to improve compliance and mitigate risk in the organization.

A. Work Plan Status / Updates





1. Audit Activity Summary (FY23-24 Work Plan):

In FY23-24 YTD, CPE initiated one hundred and forty-five (145) total audits, data risk assessments/research, compliance risk assessments, and/or reviews ("reviews"), in accordance with the annual CPE Work Plan. This includes thirty-six (36) unique and one-hundred and nine (109) routine reviews. Additionally, CPE addressed other items as per OIG's Compliance Program Guidance. A breakdown is provided below:

- Of the 145 initiated, 127 have been completed (25 unique, 102 routine).
- Of the 127 completed, 20 were completed since the last report/meeting (2 unique, 18 routine). These are reported in the tables below. Of the 18 routine reviews completed, results were mostly favorable (see Privacy).
- Of the 145 initiated, 18 reviews (12 unique, 6 routine) are currently in preparation, in process, or pending preliminary/final reports. These items are reported as "Open" in the tables below. Note: Items reported on at the prior meeting are included in data, however, are excluded from this report.

Auditing and Monito	ring – Completed
Work Plan Item/Area	Summary
(Item, Background and Rationale)	(Findings/Recommendations/Action Items)
CMS Open Payments: Review and Dispute	The objective is to determine whether LMC
Reconciliation (Annual)	had any published entires, evaluate teh
Open Payments was enacted as part of the	validity of the payments, determine future
Affordable Care Act to create transparency into	internal follow-up action or contract and
financial relationships between	training needs, and to respond by CMS'
pharmaceutical companies, medical device	deadline.
manufacturers, supply companies, and group	
purchasing organizations/vendors, and	Review complete. Results favorable. CPE
physicians and teaching hospitals. Vendors are	will annually monitor Open Payment entries
required to report payments and other	during the Open Payments Review period.
"transfers of value" to CMS for entities including	
LMC. Information is published in the Database	
and entities are required to review and either	
confirm or dispute entries by May each year.	



SEFIEIN	1BER 26, 2024
Exclusion Screening Compliance Reviews	Reviews Complete for April – June 2024.
(Monthly)	Results Favorable.
	All potential matches were reviewed and
[Background/rationale details omitted].	resolved. 100% compliance with applicable
	rules and policy with no exclusions.
21st Century Cures Act Information Blocking	Reviews Complete for April - June 2024.
Rule Monitoring (Weekly)	Results Favorable.
	No issues were found in regard to
[Background/rationale details omitted].	information blocking or access to records,
	per Privacy's reviews completed to date.
	Privacy will continue to review these weekly.
Epic User Access/Activity Monitoring	Reviews Complete for April - June 2024.
through FairWarning system for potential	Recommended Actions.
Privacy violations (Daily)	A total of (17) user-access privacy incidents
	were investigated, which resulted in six (6)
Reccuring user access daily monitoring	recommended actions, including but not
includes the following enforced policies:	limited to education, for involved members
Anomalous Workflow (AI), High Access of	of HCD's workforce.
Deceased Patients, High Access of Break-the-	
Glass, Person of Interest (POI) Snooping, High	
Access of Discharged Patients, and Coworker	
Snooping Monitoring.	
(New) HCD Leadership/Board VIP EHR	Reviews Complete for April - June 2024.
Monitoring through FairWarning system for	Recommended Actions.
potential Privacy violations (Weekly)	A total of (12) weekly access audit logs were
	investigated. No issues were found in
New (VIP/HCD Leader) Weekly Monitoring	regard to inappropriate user access per
Enforced Policy added (Executive Team and	Privacy's reviews completed to date.
Senior Leadership, AVP/VP/SVP) and all	Privacy will continue to review these weekly
Board/Committee members. Note also that all	run reports.
HCD employees have had flags added to their	
accounts (EMP) for monitoring.	
-	



	<u> </u>
SlicerDicer Access/Activity Monitoring	Reviews Complete for April - June 2024.
through FairWarning system for potential	Results Favorable.
Privacy violations (Weekly)	100% compliance with applicable rules and
	policy, with no red flags or resulting
[Background/rationale details omitted].	violations for HCD staff/Epic users. These are
	counted as monthly for purposes of
	data/reporting.
Referral Source/Physician Payment Audits	Reviews Complete for April - June 2024.
(Ongoing)	Results Favorable. Recommended Actions.
	All physician and referral source payments
[Background/rationale details omitted. Note:	routed for approval are reviewed and
These are reported only as monthly items for	audited by Compliance, and any issues are
purposes of volume.]	corrected prior to payment. Note: Prior
	recommendations made.
OIG Work Plan (Monthly)	Reviews Complete for April - June 2024. No
_	recommendations.
[Background/rationale details omitted].	The OIG added (24) new review items since
-	the last report, there were no (0) items
	applicable to HCD or that are
	recommended to be added to the Work
	Plan.

Other Completed Items:

Element/Type	Work Plan Item/Area – OTHER COMPLETED ITEMS (Non-Auditing Items, Includes Unique and Standing Items)	
	(Non-Additing items, includes onlique and standing items)	
Issuing Guidance /	See "Regulatory Updates and Industry Enforcement	
Enforcing Standards	Activity" below for a summary of these items.	
	COI Review: HCD Board/Committees (annual requirement)	
	COI Issuance: HCD Staff for FY24 (annual requirement)	
Training & Education;	 Privacy Incident Re-Education/Re-Training Activities 	
Awareness Activities	New Hire Orientation (ongoing)	
	Annual Compliance, Privacy, and Ethics Awareness	
	Event/Survey development	

Responding to Issues and Inquiries Responded to various issues, inquiries, and issued guidance internally accordingly on topics including but not limited to:	 Compliance: District Cares Application and consent authorizations, Behavioral Health, EMTALA, Billing and reimbursement, Consents, Baker Act/Marchman Act, Conflicts of Interest, ADA, Ambulance, Infection control, Policy and vendor/travel, Telehealth, Documentation requirements, Physician attestations, DNP projects, clinical rotations, and student shadow experiences, Regulatory and State Laws/bills analysis and research, Credentialing and exclusion screening. Privacy: General data privacy and information security; External data sharing, Retention & Destruction, Authorization/Consents, Release of Information, HIPAA/Part 2 Combined Consent Inquiry, Permitted vs. Required Disclosures.
Policies & Procedures (and Forms) New and Revised Policies and Procedure and Forms Reviews and guidance, including but not limited to:	 Comprehensive Review of Department P&P for HCD system conversion. P&P New/Revised/Guidance provided to HCD: Patient Care Observers andAdministrative Shadow Participation, HCD IT Security (Acceptable Use, Data Classification and Handling Policy and Procedure; Data Quality Management Policy & Procedure, IT Infrastructure Access and Authentication), School Health Bloodborne Pathogens, Behavioral Health, Medical Records Management, Retention, and Destruction Policy, Weapons Policy and Procedure, Handcuffs Procedure, and Appropriate Use of Facial Coverings for Infection Control. Forms (e.g., Consents and forms for various business units, COI, Data Classification Reference Guide, EMTALA Pre-Registration).
Training & Education; Awareness Activities	 Privacy Incident Re-Education/Re-Training Activities New Hire Orientation (ongoing) Annual Compliance, Privacy, and Ethics Awareness Event/Survey development

Open Work Plan Items are included below.



Element/Type Work Plan Item/Area - OPEN ITEMS	
	Recently Completed***; In Process**; Routine/Ongoing*
Auditing and Monitoring	 Online Tracking Technologies Risk Assessment (New/Updated)*** 340B Compliance and Program Integrity Policies & Procedures Self-Audit/Risk Assessment*** HCD Non-employed Individuals in the workplace: Risk Assessment*** Monitoring of External Audits: (1) CMS Healey Skilled Nursing Facility, 5-Claim Probe and Educate Review***; and (2) RAC (Aeromedical RAC denied: Redetermination Review Requested 3-claims; 1 claim denied, 1 claim paid, 1 claim is still pending)** (Resumed Q3) EMTALA/Access to Emergency Services and Care Risk Assessment (to be completed pre-TJC (LMC))** (New) Hospital Emergency Department Signage Review (LMC) (to be completed pre-TJC)** Privacy and Security Compliance Surveys for HCD Departments (including New ED and LMC Full Hospital Review in to be completed pre-TJC)** External Ambulance Services Claims Review and Contract Discussions (Pending AMR - anticipated closure in Q3)** On hold: PEPPER Report Monitoring for Short Term Acute Care Hospitals (STACH - LMC Q4) (CMS temporarily paused for improvements to the program and reporting system, no new updates since prior report); BAA Part 2* Routine auditing and monitoring/review items (ongoing*): SlicerDicer Use and Access Monitoring for Privacy Use; FairWarning system of detected potential privacy violations/red flags by Epic Users; Referral Source Audits and Payments to Physicians; Exclusion Screening Monthly/Ad Hoc (Credentialing Committee); OlG Work Plan Monitoring; and Information Blocking.



	3LF I LIVIDER 20, 2024
Issuing Guidance / Enforcing Standards	 HCD Privacy/IT Security Team coordination of reasonable and appropriate privacy and security controls for M365 implementation into HCD environment in alignment with HCD's Zero Trust Matrix. Data Breach Response for Panel Provider Reviews – Part II (Privacy Preparation and Readiness) (on hold)** Ongoing: Evaluation and Mandatory Rule Implementation / Development and Monitoring*, HCD Applicable Rule/Law Analysis*, Regulatory Updates/Industry Enforcement Activity*, Contract Reviews and Guidance*
Standards of Conduct / Policies & Procedures / Forms	 Complete pending publishing: Ethical and Appropriate Use of Al Technology***, Informed Consent, and Patient Stabilization and Transfer***, Patient Dismissal (Clinics)**, Baker Act (Clinics)**, Complimentary Transport** In process: Visitors(LMC)**, Visitors (Clinics)**, Handling of Stillborn in the ED SOP**, Pediatric Baker Act**, Marchman Act**, Standards of Conduct**, Internal Reporting of Compliance Issues**, and Anti-Discrimination**.
Open/Effective Communication (Ongoing*)	 Monitoring and dissemination of information to HCD staff (OIG Work Plan, Government Contractor Audits, CMS Publications, Notifications and RAC Reports; Regulatory)* Website Enhancement/Communication/Posting* Internal staff development*
Responding to Issues (Ongoing*)	 Ongoing: Hotline Call Response/Investigations*, Response to Issues/Inquiries/Investigations*, External Agency Audit Activity/Review and Response*
Training & Education	 CPE and Risk Management Newsletter: Fall Edition*** HCD Rebranding Project (e.g., Signage, Forms, Training)*** Medicare Audit Types Training Module** Training: Exclusion Checks, Tips, and Vendor Reminders** Baker Act Training Module (LMC ED/HCD)** Cybersecurity and Data Privacy Education to HCD Board of Directors/Commissioners/HCD Leadership (on hold)**
	New Hire Orientation* Compliance Program Development/Effectiveness**



B. Department Activity and Statistics:

1. Conflicts of Interest ("COI")

In FY24, HCD CPE revised the COI Disclosure Form/Questionnaire and disseminated to HCD Board and Committee Members in March 2024 and to all members of HCD's workforce in August 2024. *Pending responses from remaining individuals to close.*

2. External Agency Activity

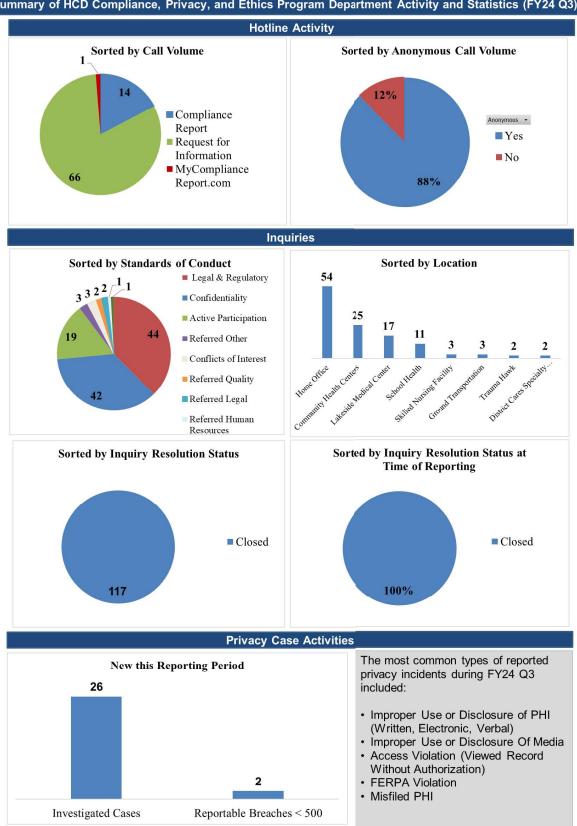
Office for Civil Rights (HIPAA/Privacy): Closed OCR Transaction Number: 24-582859

On August 9, 2024, HCD received a letter from the Department of Health and Human Services Office for Civil Rights ("OCR") from a complaint they received on July 26th alleging that a C.L. Brumback Primary Clinic violated the Federal Standards for Privacy of Individually Identifiable Health Information and/or the Security Standards for the Protection of Electronic Protected Health Information (45 C.F.R. Parts 160 and 164, Subparts A, C, and E, the Privacy and Security Rules) when it disclosed his PHI to an unauthorized individual. The OCR resolved this matter without further action through the provision of technical assistance and provided material on Reasonable Safeguards. However, should the OCR receive a similar allegation in the future, they may open an investigation of that matter. In addition, please note that, after a period of six months has passed, the OCR may initiate and conduct a compliance review of HCD's compliance with the Privacy Rule and Reasonable Safeguards.

Due to the allegation included within the OCR's complaint letter, HCD Privacy performed internal review to identify the Clinic and patient and determined no prior complaints or reports had been received by HCD. Privacy reviewed existing policies and procedures and determined no revisions were required. Further, Privacy scheduled an on-site review of the Clinic to be completed within sixty days from receipt of the letter and within the survey window period.

- 2. State of Florida Office of the Attorney General: Open Privacy Inquiry Florida Information Protection Act ("FIPA") August 6, 2024.
- 3. Hotline, Inquiries & Investigations Continued on next page.

Summary of HCD Compliance, Privacy, and Ethics Program Department Activity and Statistics (FY24 Q3)





<u>C.</u> Regulatory Updates and Industry Enforcement Activity

Regulatory Updates and Industry Enforcement Activity, including any Florida State Laws as applicable, are reported at the Board of Director/Commissioners meeting as informational and listed below by title only.

Recent Trends: Recent trends include, but are not limited to: Compliace, Privacy, and Legal updates, to include updates on the Change Healthcare data breach, increased cybersecurity focus in healthcare and ransomware attacks across many sectors, HIPAA violations, EMTALA enforcement and new reporting mechanism, proposed and final rules related to hospital reimbursement under the IPPS and OPPS, continued False Claims Act and Civil Money Penalties Law violations, continued enforcement of the Stark Law and Anti-Kickback Statute, 2024 National Health Care Fraud Enforcement Actions, as well as new Florida bills being signed into law.

Regulatory Updates (#'s 1-14)

- 1. Federal Bureau of Investigation (FBI), Cybersecurity and Infrastructure Security Agency (CISA), and the Department of Defense Cyber Crime Center (DOD) Warns Healthcare Sector that Iran-Based Group is Targeting Them
- 2. The Department of Health and Human Services (HHS) Withdraws Appeal Related to Hospital Third-Party Web Tracking Technologies
- 3. The Centers for Medicare and Medicaid Services (CMS) Issues Inpatient Prospective Payment Services (IPPS) Final Rule
- 4. Federal Judge Strikes Down the Federal Trade Commission's (FTC) Non-Compete Ban
- 5. The Joint Commission (TJC) Announces New Nursing Care Center Accreditation Standard
- 6. HHS to Streamline Cyber, Data, Artificial Intelligence Policy Functions Through Reorganization
- 7. The Department of Justice (DOJ) Issued Final Rule for Americans with Disabilities Act (ADA) Web and Mobile Applications
- 8. CMS Issued Medicare Outpatient Prospective Payment System (OPPS) Proposed Rule

- 9. The National Institute of Standards and Technology (NIST) and U.S. Department of Commerce Releases Final Versions of its Guidance on the "Safe, Secure, and Trustworthy Development and Use of Artificial Intelligence (AI)"
- 10. CMS Issues Proposed Rule for Ambulance Providers and Suppliers
- 11. HHS Issues Final Rule Establishing Disincentives for Information Blocking
- 12. HHS, FBI warn healthcare sector of social engineering scheme
- 13. Third-party Data Breaches Continue to Disproportionately Affect Healthcare
- 14. Biden Administration to Announce Rule to Remove Medical Debt from Credit Reports

Industry Enforcement Activity (#'s 15-42)

- 15. HIPAA Journal Report: Over \$460 Million Paid to Ransomware Groups in 2024 Related to Cyberattacks
- 16. HHS-OCR Imposes \$115,200 Civil Monetary Penalty (CMP) on Ambulance Company, American Medical Response (AMR), for Failure to Provide Timely Access to Patient Records
- 17. Center for Reproductive Rights Files Complaints Against Two Texas Hospitals for Failure to Treat Life-Threatening Pregnancies, Allegedly Violating The Emergency Medical Treatment and Labor Act (EMTALA)
- 18. St. Peter's Health to Pay Nearly \$11 Million to Resolve False Claims Act (FCA) Allegations
- 19. Palo Alto Medical Foundation and Palo Alto Foundation Medical Group Pay \$291,000 for Allegedly Violating the Civil Monetary Penalties Law (CMP) by Submitting Claims for Services Not Provided
- 20. Change Healthcare Reports Ransomware Data Breach to HHS
- 21. Federal Judge Allows Lawsuit Against Electronic Health Record (EHR) Vendor in Hack to Proceed
- 22.23andMe Reaches Agreement to Settle Class Action Data Breach Lawsuit
- 23. HHS-OCR Announced \$950,000 Settlement with Heritage Valley Health System for Health Insurance Portability and Accountability Act (HIPAA) Security Rule Violations following Ransomware Attack
- 24.Precision Lens to Pay \$12 Million to Resolve Anti-kickback Statute (AKS) and FCA Allegations



- 25. Texas Mental Health Services Providers to Pay Over \$1 Million to Resolve FCA Allegations, *qui tam* Relator to Receive 17% of Settlement Proceeds
- 26. DaVita Inc. to Pay Nearly \$35 Million to Resolve AKS and FCA Allegations
- 27. Rite Aid Corporation and Elixir Insurance Company Agree to Pay Over \$100 Million to Resolve FCA Allegations of Falsely Reporting Rebates
- 28.HHS' Office for Civil Rights (OCR) Updates Change Healthcare Cybersecurity Incident FAQs Following Breach Event
- 29. Change Healthcare Begins Data Breach Notification Process
- 30.Florida Registered Nurse (Tampa-Lakeland) Charged with Tampering with Consumer Products and Obtaining Controlled Substance (Fentanyl) by Fraud
- 31. Iowa Emergency Department Physician Convicted of HIPAA Violation
- 32. Multi-Agency Fraud Enforcement Report: DOJ Announces 2024 National Health Care Fraud Enforcement Actions which Resulted in Charges Against 193 Defendants Involving Nearly \$2.75 Billion
- 33. Texas Medical Institutes Agree to Pay \$15 Million to Resolve FCA Allegations in the Largest Settlement Involving Concurrent Surgeries, *qui tam* Relator to Receive Over \$3 Million of the Settlement Proceeds
- 34. Maine Physician Convicted for Unlawfully Prescribing Controlled Substances
- 35.Maryland Health Enterprises Agreed to Pay Over \$55,000 for Knowingly Retaining Overpayments, Violating the CMP Law
- 36. Founder and CEO of Digital Health Company Arrested for Health Care Fraud
- 37. South Coast Retina Center to Pay Nearly \$610,000 to Resolve AKS Allegations and CMPL Violations for Above Fair Market Value Payments to Physicians
- 38. Citizen Advocates Self-Discloses CMPL Violations, to Pay Nearly \$60,000
- 39.CityMd Agrees to Pay Over \$12 Million to Resolve FCA Allegations for Submitting or Causing Claims to be Submitted for COVID-19 Testing to HRSA's Uninsured Program for Insured Patients
- 40.Bridgeport Hospital and Northeast Medical Group Pay Nearly \$11 Million to Resolve CMP Allegations
- 41. MedPro EMS Agreed to Pay Nearly \$267,000 to Resolve CMP Allegations for Transports Involving an Unlicensed Emergency Medical Technician
- 42. Chronic Disease Management Company Agrees to Pay Nearly \$15 Million and Enter into a Corporate Integrity Agreement (CIA) to Resolve FCA Allegations for E&M Claims Submitted not in Accordance with Federal Regulations

Florida Legislative Session 2024 - Bills (#'s 43-84)

Florida Bills - Passed/Signed into Law

43.CS/	/HB 7016	- Health	Care
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44.SB 7018 - Health Care Innovation

45.CS/CS/HB 1758 - Individuals with Disabilities

46.CS/CS/HB 7013 - Special Districts

47.CS/SB 330 - Behavioral Health Teaching Hospitals

48.CS/CS/HB 159 - HIV Infection Prevention Drugs

49.SB 184 - Impeding, Threatening, or Harassing First Responders

50.CS/CS/SB 718 - Exposures of First Responders to Fentanyl and Fentanyl Analog

51. CS/CS/HB 66 - Revive Awareness Day

52.CS/HB 241 - Coverage for Skin Cancer Screenings

53.CS/CS/HB 883 - Short-acting Bronchodilator Use in Public and Private Schools

54.SB 1512 - Controlled Substances

55.CS/HB 201 - Emergency Refills of Insulin and Insulin-related Supplies or Equipment

56.CS/CS/HB 1365 - Unauthorized Public Camping and Public Sleeping

57.CS/HB 644 - Rural Emergency Hospitals

58.HB 533 - DNA Samples from Inmates

59.HB 7005 - OGSR/Financial Disclosure

60.CS/HB 7011 - Inactive Special Districts

61. HB 7085 - Sickle Cell Disease

62.CS/CS/CS/HB 1065 - Substance Abuse Treatment

63.HB 7009 - OGSR/Mental Health Treatment and Services

64.CS/CS/HB 1441 - Department of Health

65.CS/CS/CS/SB 1582 - Department of Health

66.CS/HB 1784 - Mental Health and Substance Abuse

67.CS/CS/HB 7021 - Mental Health and Substance Abuse

68.CS/CS/HB 7021 - Mental Health and Substance Abuse

69.SB 2518 - Health and Human Services



Florida Bills – Not Signed or Not Yet Signed

70.SB 792 - Community-based Mobile Crisis Intervention Services

71. HB 205 - Community-based Mobile Crisis Intervention Services

72. HB 951 - Behavioral Health

73. CS/SB 1636 - Substance Use Disorder Treatment Services

74. HB 1309 - Community Mobile Support Teams

75.SB 1626 - Mental Health of Minors

76.SB 1306 - Behavioral Health

77. HB 1521 - Medicaid Eligibility for Related Services

78. HB 1529 - Medicaid Eligibility for Medical Assistance and Related Services

79. HB 5301 - Medicaid Supplemental Payment Programs

80.CS/HB 915 - Outpatient Health Services

81. SB 1583 - Substance Use Disorder Treatment Services

82.SB 1358 - Medicaid Billing for Behavioral Health Services

83.CS/SB 1394 - Community Mobile Support Teams

84.SB 960 - Outpatient Mental Health Services

<u>D</u>. Annual Work Plan Preparation (FY25)

- HCD Compliance, Privacy & Ethics is drafting HCD's FY25 Departmental Work
 Plan. Upon completion of the current (FY23-24) Work Plan and FY25 Work Plan
 draft to commence on October 1, 2024, a detailed copy will be provided for
 approval at the next regularly scheduled meeting.
- A summary of CPE's composition/development and considerations of our annual/biannual Work Plan is included below.
- The continued goal for the annual Work Plan is for our efforts to ensure a
 proactive, risk-based, and effective program in addition to meeting or
 exceeding the recommendations described in the OIG's Compliance Program
 Guidance(s) on Effectiveness.
- The FY25 Work Plan will include all items identified that are standing or are not yet complete from FY24 (these items have been transferred from FY24 to FY25), in addition to other items to be added based on internal assessment and to address the below.



- The Department considered and includes the following in developing the annual Work Plan: Leadership/Management requests/input; Standing items; OIG CPG's and Supplemental Guidance; OIG Work Plan; New or changed rules; Recent industry enforcement and government report findings; Published guidance from regulators and authorities; High volume/high dollar/high reimbursement; Data analytics and reporting trends; Known or potential areas of risk/concern; Past items requiring monitoring; New or changed business units/service lines; Compliance Program Effectiveness and Compliance Program Evaluation Guidelines from Government and Other Entities/Authorities (e.g., DOJ, OIG, CMS).
- Information on the OIG's new CPG's (first published November 6, 2023) was provided to the Committee in March 2024. This overview document can be accessed at: HHS-OIG General Compliance Program Guidance | November 2023. HCD CPE analyzed the documents and assessed the guidance for recommended changes to the current and future Work Plans. Relevant details are summarized below for purposes of Work Plan consideration:
 - HHS-OIG published updated and improved existing CPGs and added new CPGs specific to new segments of the healthcare industry. In addition to the GCPGs, the OIG stated it will publish industry-specific CPGs ("ICPGs") for different types of providers, suppliers, and other participants.
 - The GCPGs largely maintain the historic compliance program elements, but provides more depth and incorporates lessons learned. It summarizes laws related to healthcare enforcement and other compliance standards, includes examples of problematic conduct, and places Cybersecurity as a top priority for compliance due to the increase in attacks, etc.
 - The new elements are titled: (1) Written Policies & Procedures; (2)
 Compliance Leadership & Oversight; (3) Training & Education; (4)
 Effective Lines of Communication with the Compliance Officer &
 Disclosure Program; (5) Enforcing Standards: Consequences & Incentives; (6) Risk Assessment, Auditing & Monitoring; and (7) Responding to
 Detected Offenses & Developing Corrective Action Initiatives.
 - The OIG identified certain themes, including but not limited to: Role of the Chief Compliance Officer as a Senior Leader, Tone from the Top, Well functioning Committees and Engaged Board Members, Targeted and Board Training, Multiple Reporting Pathways for Compliance Concerns, and Considerations for Incentives for Compliant Behavior.

The DOJ provided additional compliance considerations to the OIG's publication (e.g., Quality as part of Compliance, Regulatory landscape to address compliance and business risks, financial monitoring with physicians and others for kickbacks, etc.).

4. Fiscal Analysis & Economic Impact Statement:

	Current FY Amounts	Total Amounts (Current + Future)	Budget
Capital Requirements	N/A		Yes No
Net Operating Impact	N/A		Yes No No

С	apital Requirements	N/A		Yes	No) [
N	et Operating Impact	N/A		Yes	No) [
	-budgeted expenditures in excess oval. Reviewed for financial accurac				/iew o	and	Board
	N/A						
	Jessica Cafarelli						
	VP & Chief Financial Of	ficer					
5.	Reviewed/Approved by	Committee:					
	N/A		1	N/A			
	Committee Name		Date A	pproved			_
6.	Recommendation:						
	Staff recommends the Co	mmittee Rece	ive and File the HCD (Complian	ce, P	rivc	ıcy &
	Ethics Program Updates an			ı	,		,
	0 1	•	, ,				
	Approved for Legal sufficier	ocv:					
	Approved for Legal sufficier	icy.					
	Gernabe Icaza						
	OCF6F7DB67Be494abe Icaz						
	SVP & General Cou	unsel					
	Signed by:		Signed by:				
	Heather Bokor		Darcy D	avis			
	4766F813A Hseath er Bokor			Baynat71D.avis			
	VP / Chief Compliance, Privo	acy & Ethics	Chief Exe	ecutive Office	ər		
	Officer						



1. Description: Quality & Patient Safety Dashboards

2. Summary:

This agenda item provides the quality and patient safety reports for the 2nd Quarter of 2024 for School Health, Aeromedical, Trauma, Community Health Centers, Skilled Nursing Center, Lakeside Medical Center, Ground Transportation, Pharmacy, and Corporate Quality Metrics.

3. Substantive Analysis:

School Health

Florida-Mandated Student Screenings

- We exceeded the Florida-mandated goal of completing 95% of the vision and hearing, BMI, and scoliosis screenings required at the end of the School Year (Quarter 2). Parents are notified of any abnormal results so they can follow up with their healthcare provider and/or appropriate community resources.
- BMI screening: Through the 2nd quarter of 2024, we screened 32,480 (99.8%) of eligible students in the 1st, 3rd, and 6th grades. Out of 32,480 students, 7,976 (25%) students required referral.
- Hearing screening: Through the 2nd quarter of 2024, we screened 32,205 (98.8%) of eligible students in kindergarten, 1st, and 6th grades. Out of 32,205 students, 1,090 (3%) students required referral.
- Scoliosis screening: Through the 2nd quarter of 2024, we screened 9,955 (100%) of eligible students in 6th grade. Out of 9,955 students, 84 (0.84%) students required referral.
- Vision screening: Through the 2nd quarter of 2024, we screened 44,351 (98.9%) of eligible students in kindergarten, 1st, 3rd, and 6th grades. Out of 44,351 students, 7,046 (15.89%) students required referral.

Aeromedical

Run Time

Aeromedical–Trauma Hawk flew 110 transports for Q2 2024, out of which were 85 scene flights and 25 interfacility flights. Out of the 84 scene transports, there were 80 trauma patients (73%) and 30 medical patients (27%). The average dispatch time to enroute was 0:06:59, which is above the county ordinance goal of < 5 min. The average of dispatch to arrival on scene was 0:19:38 meeting the goal < 20 min. The top three destination hospitals for scene transports in Q2 were: 1. – St. Mary's Medical Center



(74), 2 – Delray Medical Center (4), and 3. – Palm Beach Gardens Medical Center (3).

Out of the 25 interfacility flights completed the top three categories were: 1) Cardiac Non STEMI (6), Trauma-Penetrating (4) and Cardiac STEMI (4). The average time from dispatch to enroute was 0:23:39 with an average of 0:36:47 from dispatch to arrival at the sending hospital. The top three destination hospitals were: JFK Medical Center (9), St. Mary's Medical Center (8), and Nicklaus Children's Hospital/Joe DiMaggio and Jackson Memorial (2).

There were 128 cancelled/turned down flights for Q2 2024. The top three reasons were by referrering agency, no transport required and weather.

Trauma Hawk Patient Transports

Over Q2 of 2024, Trauma Hawk transported 110 patients. 73% were Trauma patient types and 27% were Medical patient types, while 77% were transported from a 911 Scene Response and 23% were Interfacility Transports.

- <u>Transport Data:</u> out of the 110 patients transported, there were 0 separate Medical Escort cases (no direct patient care provided, medical crew was outsourced not included in number of total transports). Multiple Casualty Incidents showed 5% of the patients transported were from the same scene/incident.
- <u>Demographics:</u> gender breakdown revealed 30% were Female and 70% were Male. Race showed that patients transported were 23% Latino, 34% Black and 43% White. Age Distribution for Medical transports showed the 66-75 age group as the highest at 20%, while Age Distribution for Trauma transports showed the age group of 26-35 as the highest with 18%.
- Receiving Rescue Ground Unit: top 3 PBCFR Rescue Response ground units who Trauma Hawk received patients from were R73, R74 and R273 – who are stationed in Belle Glade and South Bay respectively.
- <u>Dispatch City:</u> showed 53% of transports were dispatched to West of the 20 Mile Bend, while 47% were dispatched East of the 20 Mile Bend.
- <u>Primary Impression:</u> the top 3 Primary Impressions showed Head Injury, Lower Extremity Injury, and Multiple Injuries as the leading chief complaints for transport.
- Monthly Volume: stacked monthly volume trends for Q2 showed an 11% increase in April, a 29% decrease in May, and a 19% decrease in June compared to 2023.



Trauma

During Q2 of 2024, 1,402 patients were seen at the two trauma centers in Palm Beach County, compared to 1,573 seen in Q1 2024.

Palm Beach County Trauma System Utilization

- <u>Demographics</u>: Gender breakdown showed 37% of the trauma patients were Female compared to 63% Male. Race showed White making the majority of the trauma patients with 71%, followed by Black at 19%, and 10% classified as Other. Ethnicity showed that the majority of the trauma patients were Non-Hispanic at 79%. Age Groups showed that 10% of trauma patients were Pediatric, 49% were Adult, and 41% were Geriatric. Age Range showed that the 76-85 age group were the highest at 15%, while the age group of 26-35 and >85 were tied at 13%.
- Monthly Volume: stacked monthly volume trends for Q2 showed a 3% increase in April, a 6% decrease in May, and a 7% decrease in June compared to 2023.

Trauma System Utilization per Trauma Center

- Monthly Volume:
 - St. Mary's Medical Center: stacked monthly volume trends for Q2 showed a 1% increase in April, a 1% decrease in May, and a 2% decrease in June compared to 2023; with a total volume of 778 for Q2.
 - Delray Medical Center: stacked monthly volume trends for Q2 showed a 5% increase in April, a 12% decrease in May, and a 16% decrease in June compared to 2023; with a total volume of 624 for Q2.

Demographics:

- St. Mary's Medical Center: gender breakdown showed 34% of the trauma patients were Female compared to 66% Male. Race showed White making the majority of the trauma patients at 66%, followed by Black at 24%, and 10% classified as Other. Ethnicity showed that the majority of the trauma patients were Non-Hispanic at 71%. Age Groups showed that 15% of trauma patients were Pediatric, 57% were Adult, and 28% were Geriatric. Age Range showed that the 26-35 age group were the highest at 17%.
- Delray Medical Center: gender breakdown showed 40% of the trauma patients were Female compared to 60% Male. Race showed White making the majority of the trauma patients at 77%, followed by Black at 14%, and 9% classified as Other. Ethnicity showed that the majority of the trauma patients were Non-Hispanic at 89%. Age Groups showed that 4% of trauma patients were Pediatrics, 42% were Adults, and 54% were Geriatric. Age Range showed that the 76-85 age group were the highest at 21%.

- Trauma Center Volume by Year:
 - St. Mary's Medical Center: shows 1,693 trauma patients were seen YTD for 2024.
 - Delray Medical Center: shows 1,282 trauma patients were seen YTD for 2024.

Palm Beach County Trauma Injury Analysis

- Mechanism of Injury & Subcategories: The Top 5 Mechanisms of Injury and Top 5 Subcategories showed the following:
 - Falls: led at 46% for cause of injury. Looking further, 37% were same-level falls, 31% were unspecified, 8% were falls from a bed, 4% were falls from a ladder, and falls from an elevated level respectively.
 - Vehicular: followed at 33% for cause of injury. Looking further, 49% were motor vehicle vs motor vehicle collisions, 11% were motorcycle crashes, 10% were motor vehicle vs pedestrian collisions, 9% were motorcycle vs motor vehicle collisions, and 5% were bicycle crashes.
 - Assault: followed at 8% for cause of injury. Looking further, 36% were assaults with guns, 31% were assaults with a knife or sharp object, 19% were assaults during a fight/brawl, 8% were assaults with a blunt object, and 4% were assaults with an unspecified route.
 - <u>Burn:</u> followed at 4% for cause of injury. Looking further, 25% were burns from food, drink, or related to cooking, 23% were electrical burns, 14% were burns from fire or smoke, 12% were burns from a flammable object, and 9% were burns from an unspecified route.
 - Unintentional: rounding out the top 5, at 2% for cause of injury are accidental injuries. Looking further, 27% were accidental injury from a knife or sharp object, 23% were accidental injury by walking into or striking an object, 17% were injuries from accidental use of bodily force, and 10% were accidental injury from a hand tool, as well as accidental-non-burn-injuries from an explosion of a pressurized object respectively.
- <u>Transportation Mode:</u> showed that the majority of trauma patient transports were by Ground at 92%, while Air accounted for 8%.
- <u>Injury Type:</u> the injury classification showed Penetrating at 11%, Blunt at 85%, and Burn at 4%.

Community Health Centers

The following measures were not meeting goal at the end of Quarter 2 2024: Hypertension (72%), goal is 80%, Ischemic Vascular Disease/Antiplatelet Therapy (73%), goal is 86%, Adult Weight Screening and Follow Up (65%), goal is 90%, Childhood immunication (55%), goal is 60%, Breast Cancer Screening (56%), goal is 60%, Cervical Cancer Screening (60%), goal is 65%, Colorectal Cancer Screening (38%) with goal of 82%.

All other goals achieved for the guarter.

Skilled Nursing Center

For Q2 2024, the following quality measures did not meet goal:

- % of Residents with pressure ulcers (long stay) was 8.3% which was above the national benchmark of 7.4%
- All other quality measures met goal for the quarter.

Lakeside Medical Center

For Q2 2024, **Inpatient Quality Measures** there was 1 of 4 measures (ED-1a) that did not meet goal.

ED Measure:

For ED-1a, there were (101) cases that fell into the sample population for Q2 with a median time of (334) minutes, which is higher than the set goal of (313) minutes.

For Q2 2024, **Outpatient Quality Measures**, there were 2 of 2 measures (OP-18, OP-23) that did not meet goal.

OP-18 Measure:

For OP-18, there were (95) cases that fell into the sample population with a median time of (153) minutes, which is higher than the set goal of (134) minutes.

OP-23 Measure:

For OP-23, there were (2) cases that fell into the sample population, the goal of >71% was not met.

Ground Transportation

Ground Transportation is trending and monitoring 6 GAMUT quality metrics for 2024. These are Use of Appropriate Pain Scale, Blood Glucose Testing for Altered Mental



Status Patients, Waveform Capnography Monitoring for Patients with Mechanical Ventilation and/or Advanced Airways, Medical Equipment Failures, Appropriate Management of Aortic Emergencies and Temperature Assessment. During Q2 2024, our program trended at 98% for the Use of an Appropriate Pain Scale which is above the GAMUT national threshold of 90%. For Blood Glucose Testing for Altered Mental Status Patients we were at 88%, which is below the GAMUT national threshold of 91%. We were at 100% for Waveform Capnography Monitoring for mechanically ventilated patients with an advanced airway exceeding the GAMUT national threshold of 95%. We had no Medical Equipment Failure events this quarter and we did not transport any patients with aortic emergencies. We also reached 99% for performing and documenting temperature with the first set of vital signs, surpassing the GAMUT national threshold of 85.7%.

Pharmacy

For Q2 2024, the Pharmacy has met all goals. The average prescription wait time was around 10 minutes, and roughly 15% of prescriptions were waited for by patients, which was also within the goal. The promised time was met for over 99% of orders. The out-of-stock percentage goal was also met, with only 2.1% of the total prescriptions needing to be ordered for the next business day.

Corporate Quality Metrics

Call Center

For Quarter 2 2024, the Clinic Service Center received 60,070 incoming calls, which is a 5% increase compared to last quarter. Of the 60,070 calls, the Patient Access Coordinators handled/resolved 53,285 in real-time. The abandonment rate was at 9%, with a goal of 10% or less. The abandonment rate has decreased by 4% from the previous quarter. The service level (% of calls answered within 3 mins) was at 66% was a goal of 80%. The average hold time for callers was 2m 22sec with a goal of 3 mins or less.

Overall the call center is performing well. We have managed to decrease our abandonment rate and hold times. We have also increased our service levels and quality scores as well.

<u>Information Technology</u>

• **Customer Service:** In Q2, our IT department opened a total of 4,266 new support tickets and successfully closed 4,221 tickets, including those carried over from the previous month. On average, we received 47 new tickets each day. The average

time taken to resolve a ticket, excluding any hold time, was 3 hours. Additionally, the IT Service Desk handled 3,247 calls. The average wait time for these calls was 25 seconds, and the rate of calls abandoned was 4.0%, which is below our target rate of 4.5%.

• **Cybersecurity**: In Q2, The security team investigated 440 security incidents. Those were all closed, and none was reportable. The incidents included phishing, impostor, malware, and spam emails, responding to the security operations center alerts, and users reported security investigations.

Human Resources

Turnover and Recruitment:

- For Q2 2024, the average turnover was 15 employees/month, a decrease of 34.7% from the previous quarter, and it's below the industry standard of 26 employees.
- For Q2 2024, the highest turnover rate (2%) was among employees with 3-5 years of service.
- For Q2 2024, the top 3 highest turnover rates by business units were the Ground transportation department, followed by Healey and Clinics Medical.
- At the end of Q2 2024, there were 90 open requisitions, a 157% increase from the previous quarter (35)
 - 50 days = Average time to Fill, which is above the 49 days industry standard (12.3% decrease from the previous quarter of 57 days)
 - 17 days = Average time to Hire, which is within the industry standard of 36 days (a 5.5% decrease from the previous quarter of 18 days).

5.

6.

HEALTH CARE DISTRICT OF PALM BEACH COUNTY QUALITY, PATIENT SAFETY AND COMPLIANCE COMMITTEE SEPTEMBER 26, 2024

4. Fiscal Analysis & Economic Impact Statement:

SVP & Chief Medical Officer

	Current FY Amounts	Total Amounts (Current + Future)	Budget
Capital Requirements	N/A	(Current + ruture)	Yes No X
Net Operating Impact	N/A		Yes No X
*Non-budgeted expenditures i approval. Reviewed for financi		•	
N/A			
Jessica Cafare	·lli		
VP & Chief Financial	Officer		
N/A Committee Nar	 ne		I/A pproved
Recommendation:			
Staff recommends the	Committee Re	ceive and File the Qu	ıality & Patient Safe
Dashboards			
pproved for Legal sufficie	ency:		
Bernabe Icaza			
OCF6BBANGAGE Icaza	_		
SVP & General C	ounsei		
SVP & General C	ounsei	Signed by:	
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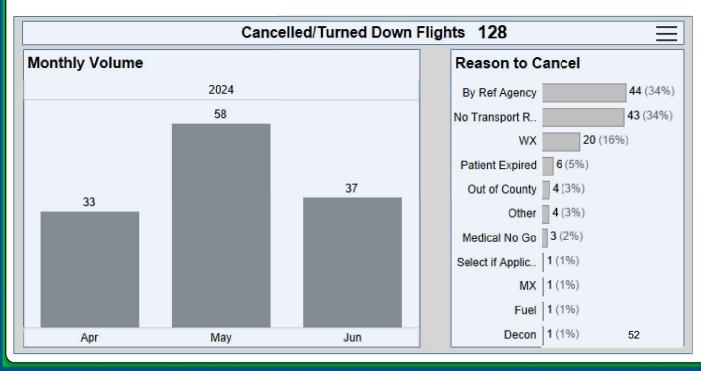
Chief Executive Officer

Docusign Envelope ID: ECD33A09-8C6E-4031-9650-2B7E728BC304 Florida Mandated Student Screening Summary Color Legend: **Health Care District** # Total Distinct Students # Abnormal (Cumulative) Goal 95% of Students to Have Completed Vision and Hearing Screenings by March 2024 # Distinct Students screened this month SCHOOL HEALTH Goal of 45% of Students to Have Completed BMI and Scoliosis Screenings by March 2024 # Screened (Cumulative) Percent of Goal reached **Hearing Screenings BMI Screenings** 1.2% 2.0% 3.0% SY 20-21 SY 21-22 SY 22-23 Q4 23-24 SY 21-22 Q3 23-24 Q4 23-24 SY 20-21 Q3 23-24 SY 22-23 32,480 32,205 31,727 31,617 31,330 31,211 753 588 397 406 2,724 2,967 28,606 (99.8%)28,244 98.8% 97.0% (97.5%)95.8% (96.3%)95% Goal 5,490 5,673 (87.9%)86.7% 23,116 22,571 4,798 4,079 (71.0%)69.3% 18,492 18,318 16,653 16,544 1,948 1,665 5,168 56.8% 4,551 (56.3%)(51.2%)50.8% 11,993 11,485 45% Goal 6,149 -5,453 36.8% (35.3%)6,032 5,844 4,718 ,976 (25) 4,569 795 (25% ,111 (259 (18.5%)5,919 (269 17.9% 1,314 1,275 ,820 (269 424 (279 1,314 1,275 209 (289 640 (279 (4.0%) 383 (29%) 3.9% 27 (2%) ,043 (3% ,068 (39 880 (3%) ,090 (39 693 (3% 127 (2%) September October November December January February March April May September October November December January February March April May August August **Vision Screenings Scoliosis Screenings** 19.9% 17.0% 17.7% 16.7% 0.8% 0.7% 0.9% 1.1% 1.0% 14.0% SY 21-22 Q3 23-24 Q4 23-24 SY 20-21 SY 22-23 SY 22-23 Q3 23-24 Q4 23-24 SY 20-21 SY 21-22 44,351 9,955 43,583 9,744 43,018 9,623 211 768 565 121 3,908 699 8,924 39,110 98.9% 100.0% 97.2% 97.9% 96.0% 1,266 96.7% 95% Goal 8,780 7,658 87.3% 89.6% 1,144 30,330 6,514 76.9% 5,440 5,989 525 24,890 67.7% 2,243 65.4% 22,337 2,553 60.2% 5,865 55.5% 3,746 16,472 49.8% 8,307 45% Goal 1,317 37.6% 2,429 36.7% 8,165 1,872 6,463 24.4% 84 (1%) 84 (1%) 84 (1%) 80 (1%) 18.2% 557 1,702 6,841 (16% 6,935 (16% 046 (169 64 (1%) 399 (169 557 ,264 (179 47 (1%) 1,702 42 (1%) ,415 (189 978 (18 31 (1%) 087 (199 20 (1%) 626 (209 335 (20% March April May March April May August October November December January February August September October November December January February

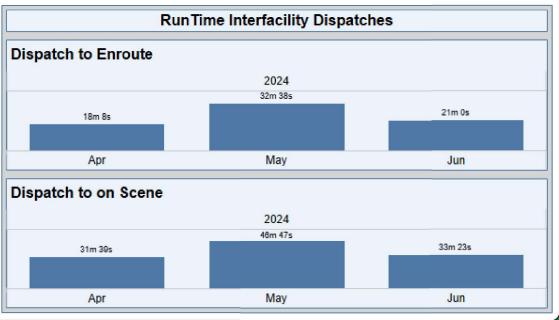
AEROMEDICAL DATA 4/1/2024 - 6/30/2024











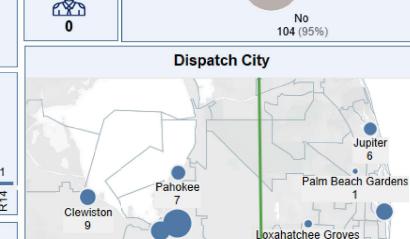
Receiving Rescue Ground Unit

18

TRAUMA HAWK PATIENT TRANSPORTS 4/1/2024 - 6/30/2024



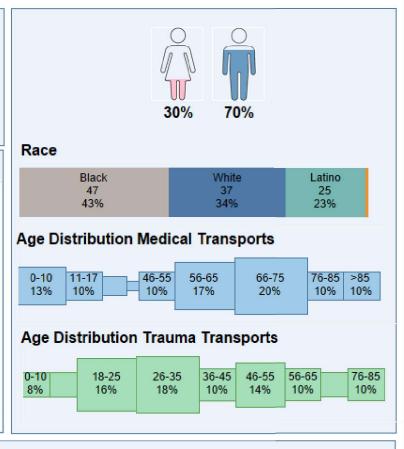
Dispatch response Type 911 Response Interfacility Transport Medical Trauma **@-@** 80 (73%) 30 (27%) 25 (23%) 85 (77%)

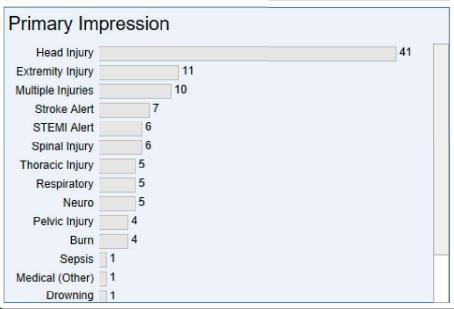


South Bay 13

© 2024 Mapbox © OpenStreetMap

20 Mile bend







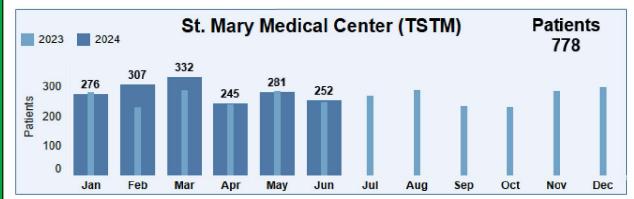
Jupiter

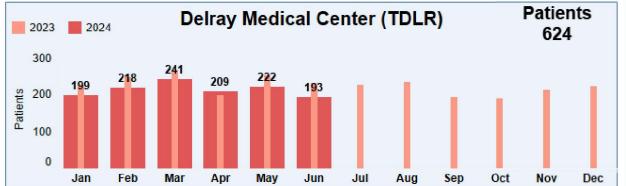
Atlantis

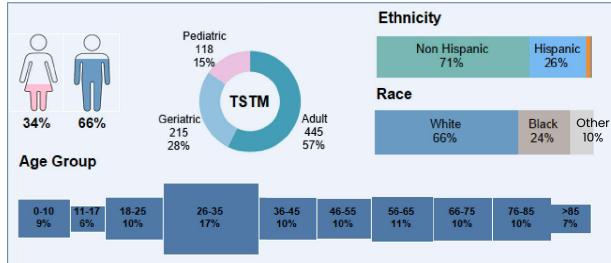
Delray Beach

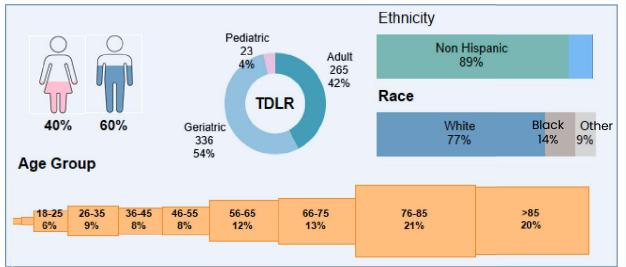
Trauma System Utilization per Trauma Center

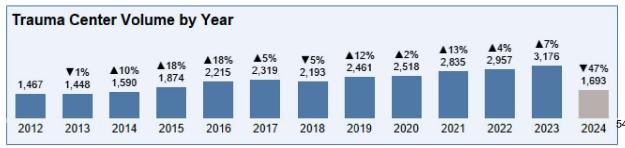
4/1/2024 - 6/30/2024











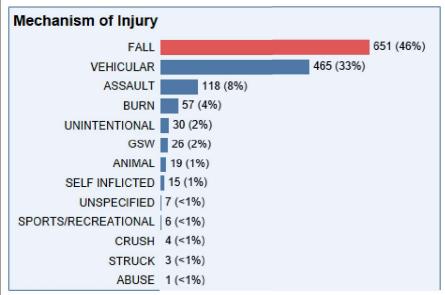




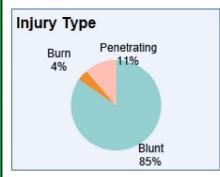
Palm Beach County Trauma Injury Analysis

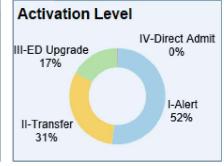
4/1/2024 - 6/30/2024

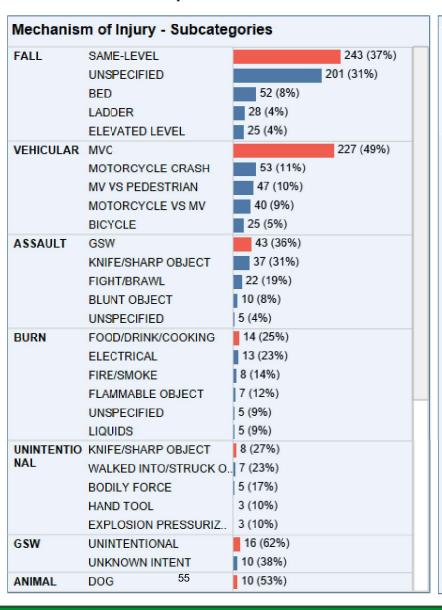






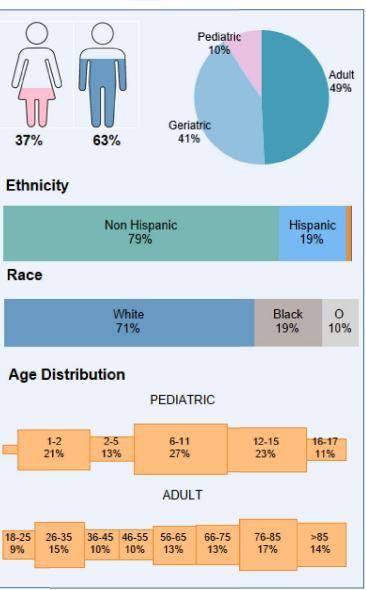








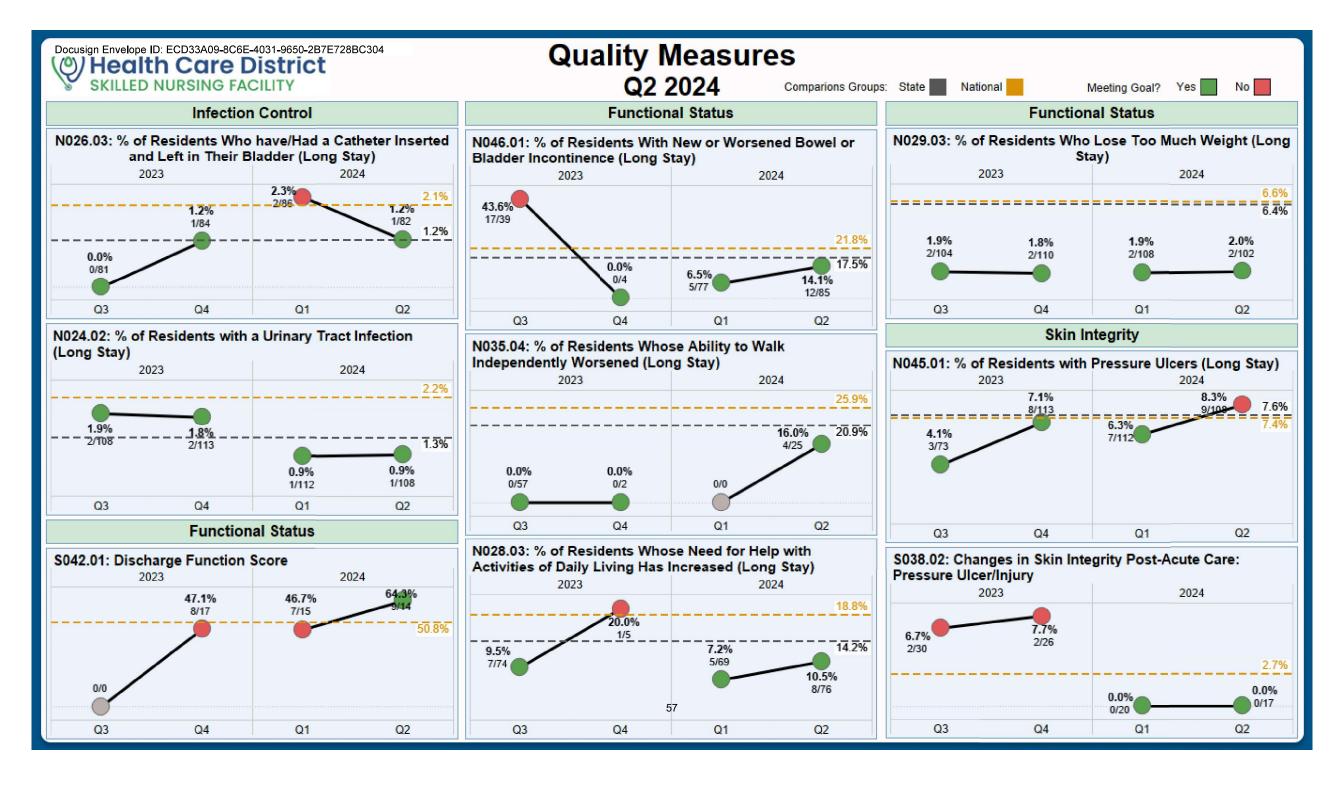




UDS PROVIDER LEVEL QUALITY MEASURES 2024 NATIONAL QUALITY LEADER METRICS



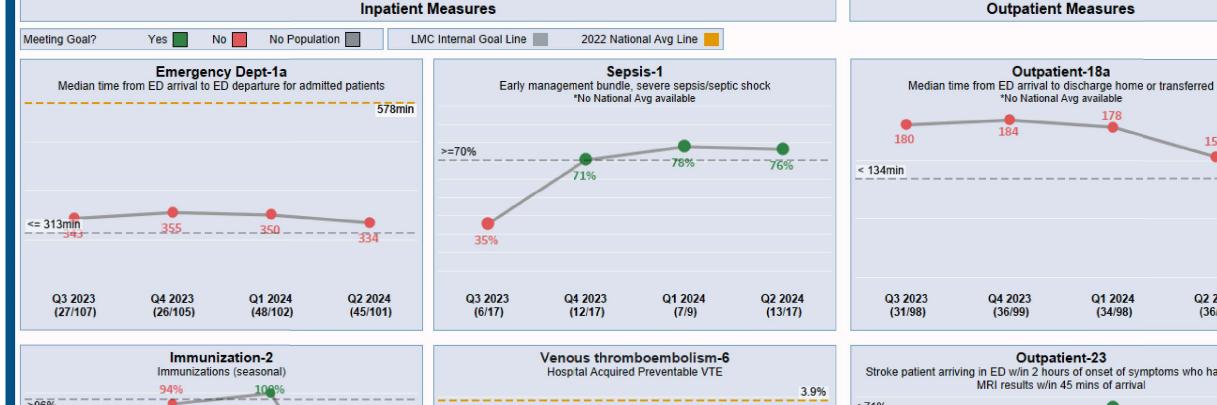


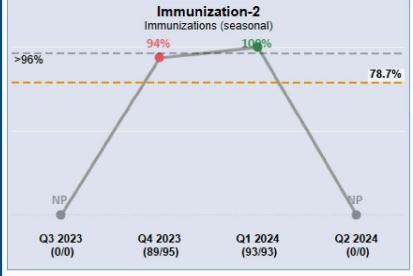


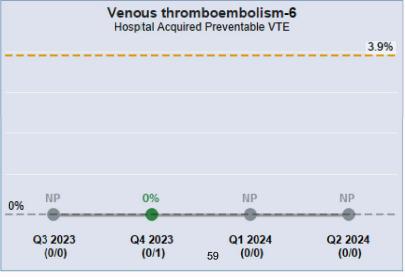


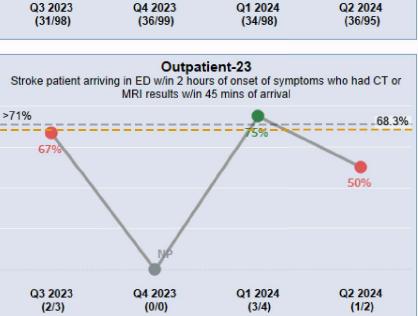
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LMC Quality Core Measures Q2 2024









178

153



Ground Transportation Quality Metrics

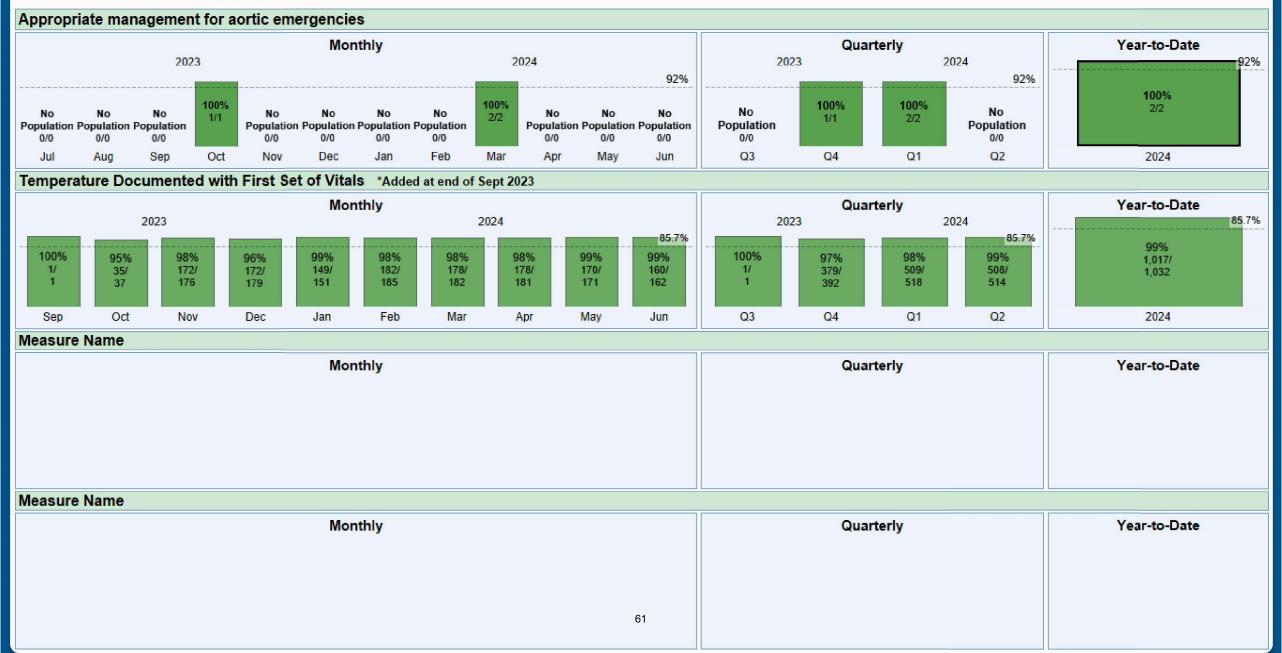






Ground Transportation Quality Metrics





Apr

CLINIC SERVICE CENTER PERFORMANCE

dates: 4/1/2024 to 6/30/2024

INBOUND CALL VOLUME

C.M

60,070

ABANDONMENT RATE Goal: 10% or less

5,265 (9%)

HANDLED BY AGENT

53,285 (89%)

AVG SL % ACROSS CSQ'S Service Level Goal:

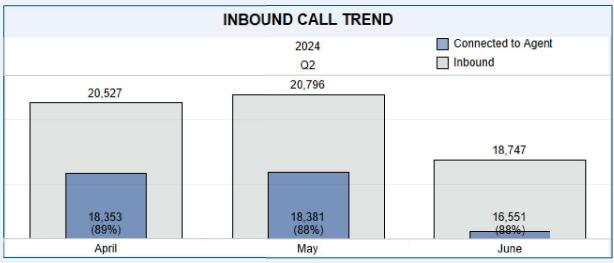
66%

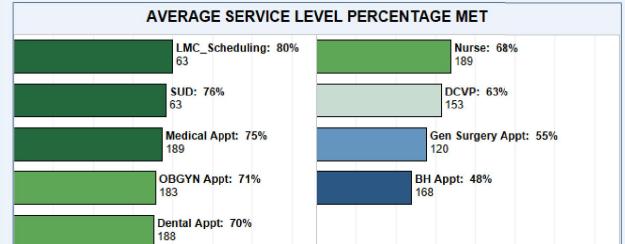
AVERAGE HOLD TIME

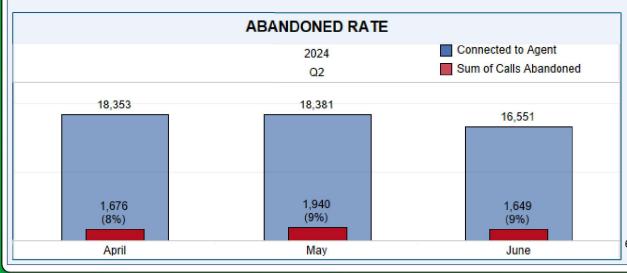
Ave Hold Time Goal: 3 min or less 2m 22s AVERAGE CALL DURATION

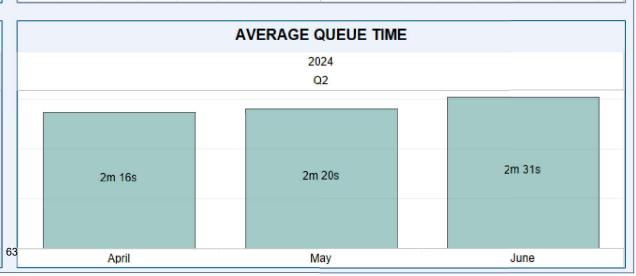
4m 34s

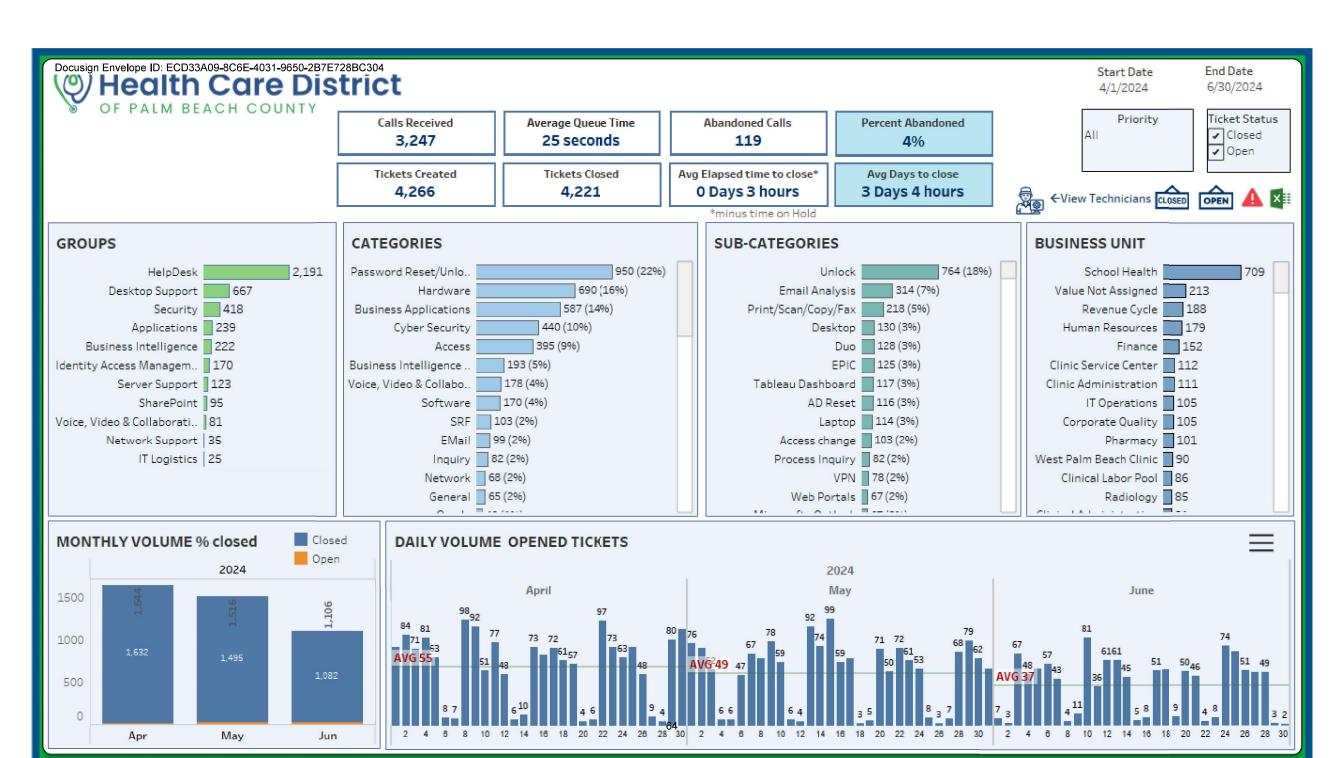






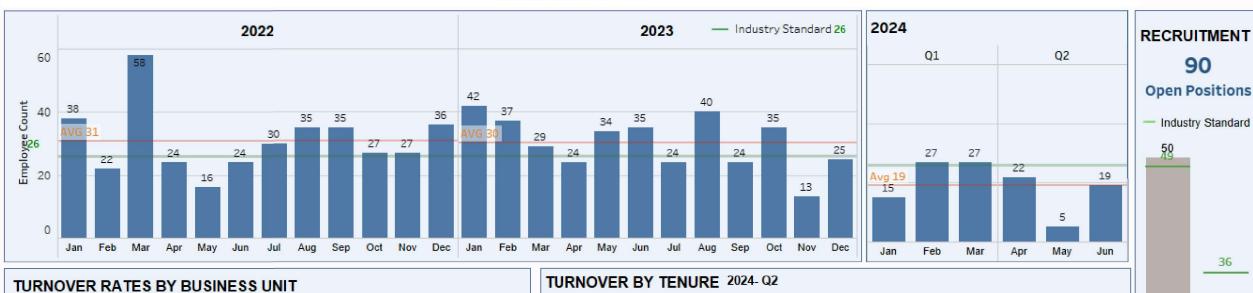


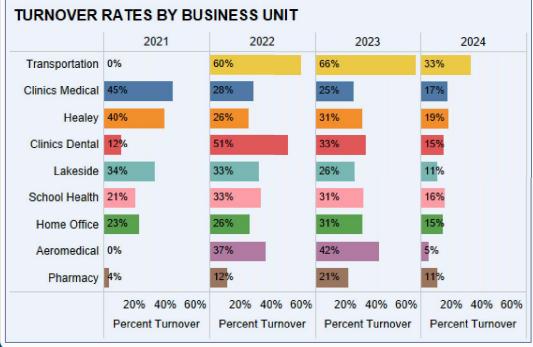


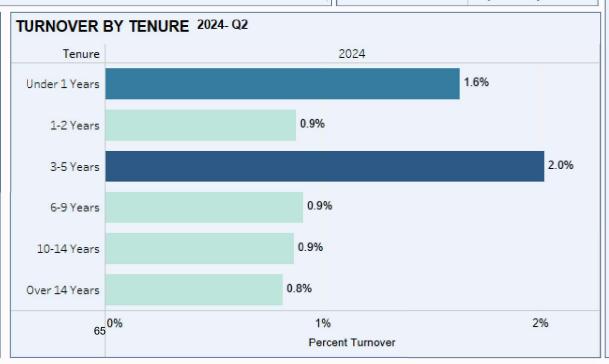


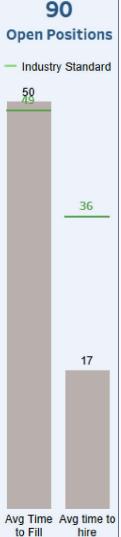
TURNOVER AND RECRUITMENT

ANNUAL TURNOVER











1. Description: HCD Enterprise Risk Management Program Updates and Activities Quarterly Report and Dashboard (FY Q3 2024)

2. Summary:

A summary report of the Enterprise Risk Management ("ERM", "Risk", or "Risk Management") Program activities and updates, along with a dashboard covering the top five trending events and regulatory reported and/or potentially compensatory events, since the last meeting is provided. This report covers the Third Quarter of 2024 ("Q3 2024") for the following Health Care District of Palm Beach County ("HCD", "HCDPBC", or "District") business units: Lakeside Medical Center ("LMC"), Edward J. Healey Nursing and Rehabilitation Center ("Healey", "Skilled Nursing Facility", or "SNF"), Community Health Centers ("CHC" or "Clinics", formerly known as C.L. Brumback Primary Care Clinics), Pharmacy, School Health, Aeromedical/TraumaHawk ("Aeromedical"), Ground Transportation Services ("Ambulance" or "GTS"), District Administration/Home Office, and Managed Care.

Confidentiality note: This report is made in the open and may include confidential or sensitive information. For purposes of reporting, event information shared thorugh data is in the aggregate and summary details on reported entries are shared without reference to a particular individual or patient. Specific event details are not provided in this forum. Please contact Heather Bokor, VP / Chief Compliance, Privacy, & Risk Officer, for comments or inquiries on any of the information reported here which may require further detail or discussion.

3. Substantive Analysis: ERM Quarterly Dashboard and Report

In Q3 2024, HCD had a total of 629 reports entered in its Safety Event Reporting System ("SERS" or "RiskQual/HAS"). The dashboard represents the Top five (5) trending event categories reported along with the risk severity levels and near misses for each HCD Business Unit. A detailed summary is provided below. Included in this report (new) are events that were either reported externally to



the proper regulatory bodies/agencies as required, or that were flagged as a Potential Compensatory Event (PCE). Additional detail is provided.

Risk Severity Volumes/Types:

Of the 629 entries reported in RiskQual/HAS, 614 were Events/Occurrences and 15 were Near Misses.

- Approximately 2.4% (15) of the events reported were "Near-Misses" or "Near Miss Events". A Near Miss is an event that was prevented from actually occurring and did not result in any harm to an individual.
- 88.4% (556) of the events reported were "No Harm Events". A No Harm Event is an event that occurred but resulted in no harm to an individual.
- 8.7% (55) were "Minor Events". A Minor Event is an event that occurred, but had no harm to the patient, however, required monitoring.
- 0% (0) was a "Moderate Event". A Moderate Event is an event that occurred, had temporary harm, but did not require significant interventions.
- 0% (0) were Aeromedical "Minor Events". A Minor Event is an event that caused slight injuries to personnel; little environmental impact; damage less than \$50,000; limited impact to image.
- Less than 1% (0.5%, 3) were Aeromedical "Negligible Events". A Negligible Event is superficial/no injuries to personnel; negligible or no environmental effects; damage less than \$10,000; light or no impact to image.

Events/Near Misses by Business Unit, Category, and Volume.

Includes all reported events and any required regulatory reported events and PCE's:

Hospital (LMC):

- LMC reported a total of 104 entries in HAS
- This included 89 patient events, 15 non-patient events, and no (0) Near Misses.
- The 104 Events were reported under the following categories, sorted by volume: AMA* (32), Behavior (21), Falls/slips (10: 8 no harm, 2 minor harm), IV/Blood Issues (9), Facility/Administrative Services (5), Equipment-Related (5), Patient Care (3), Admission/Discharge/Transfer Issues (3), Security (2), Safety (2), Medication Variance (2), Lab (2), Clinical Event for Review (2), Treatment/Therapies (1), Surgery (1), Skin Issues (1), Property (1), Medical Documentation/Patient Records (1) and HIPAA/Privacy (1).

• (*) These events are included for facility-requested reporting purposes only due to a patient's status, however, were non-incident related events (all were for social or personal reasons).

Skilled Nursing Facility (Healey):

- Healey reported a total of 123 entries in HAS.
- This included 118 resident events, 3 non-resident events, and 2 Near Misses.
- The 121 Events were reported under the following categories, sorted by volume: Skin Issues* (77), Safety (17), Fall/Slips (13: no harm), Patient Care (5), Behavior (3), Property (2), Security (1), Nutrition/Dietary (1), Medication Variance (1), and Equipment-Related (1). The Near Misses were each Medication Variances (2).
- (*) These are included for facility-requested reporting purposes only due to a resident condition, however, were non-incident related events.
- Reported regulatory events: Six (6) cases were reported to the Agency for Healthcare Administration ("AHCA") as Immediate (1-day) and 5-Day Reports. 42 CFR s. 483.13(c) Ensure that all alleged violations involving abuse, neglect, exploitation or mistreatment, including injuries of unknown source and misappropriation of resident property, are reported immediately, but not later than 2 hours after the allegation is made, if the events that cause the allegation involve abuse or result in serious bodily injury, or not later than 24 hours if the events that cause the allegation do not involve abuse and do not result in serious bodily injury, to the administrator of the facility and to other officials (including to the State Survey Agency and adult protective services where state law provides for jurisdiction in long-term care facilities) in accordance with State law through established procedures.

Community Health Centers(Clinics):

- CHC's reprorted a total of 95 entries in HAS.
- This included 74 patient events, 17 non-patient events, and no (0) Near Misses.
- The 95 Events were reported under the following categories, sorted by volume: Behavior (31), EMS/911 Referral (16), Safety (10), Patient Care (10), Equipment Related (6), Lab (4), Falls/Slips (4: 3 no harm, 1 minor harm), EHR/HIT (3), Medication Variance (2), Medical Documentation and Patient Records (2), HIPAA/Privacy (2), Supplies (1), Property (1), Infection Control (1), and Facility/Administrative Services (1).
- Potentially Compensatory Event ("PCE"): One (1) case was identified as a PCE and flagged by ERM to Insurance and Legal Services (Delray CHC).

Pharmacy:

- Pharmacy reported a total of 84 entries in HAS.
- This included 75 patient events and 9 Near Misses.
- The 75 events were reported under the following categories, sorted by volume: Prescription Errors (30), Medication Variance (26), Behavior (15), Prescription Mail Return (3), and Security (1). The Near Misses included: Prescription Errors (6), Medication Variance (2), and EMS/911 Referral (1).

School Health:

- School Health reported a total of 183 entries in HAS.
- This included 173 student events, 7 non-student events, and 3 Near Misses.
- The 180 events were reported under the following categories, sorted by volume: Safety (57, including 35 DCF referrals*), Medication Variance (48), Patient Care (29), Behavior (20), Medical Documentation/Patient Records (13), Treatment/Therapies (5), Clinical Event for Review (3), Supplies (2), HIPAA/Privacy (2), and EHR/HIT (1). The Near Misses included: Medication Variances (2) and Supplies (1). Note: All events and near misses were no harm or minor harm events.
- Reported regulatory events: (*) 35 DCF referrals were mandatory reporting purposes only, however, were non-incident related events.

Ground Ambulance (GTS):

- GTS reported a total of 36 entries in HAS.
- This included 17 patient events, 18 non-patient events, and 1 Near Miss.
- The 35 Events were reported as no harm events under the following categories: Safety (27), Equipment Related (2), Property (1), Infection Control (1), Facility/Administrative Services (1), Clinical Event for Review (1), Behavior (1), and Admission process/discharge/transfer issues (1). The Near Miss was reported as a Medication Variance (1).

Air Ambulance (Aeromedical / TraumaHawk):

Aeromedical reported a total of 3 entries in RiskQual/HAS and No (0) Near Misses.

The 3 non-patient events were reported as negligible events under the following categories: Safety (2) and Equipment-Related (1).



District Administration / Home Office:
Home Office/District Administration reported one (1) Event in RiskQual/HAS and No
(0) Near Misses. The event was reported under Safety (no harm event).

4. Substantive Analysis: ERM Program Activities and Event Response Actions (New/Ongoing)

HCD's ERM Program is committed to creating, maintaining, and continuously improving a culture that reflects a commitment to providing safe, quality healthcare and protecting people, property, and the organization's environment. ERM administers a proactive and preventive (as well as responsive) management system of best practices, policies, and procedures. ERM continues to assess HCD's risks and develop the Program to address areas for attention and/or enhancement (risk mitigation and risk reduction).

ERM provided a detailed summary report of its primary responsibilities, as well as information on FY24 key activities, awareness, and risk innovation and mitigation strategies which have had significant or notable work by ERM across HCD, within each business unit, and within the ERM team. As these are continuous/ongoing, they have been removed from or reduced within this report to avoid duplication. A summary of new/updated efforts related to these initiatives are included below:

• (Ongoing) FY24 Failure Mode Effects Analysis proactive risk assessments:

Business Unit	Annual FMEA Item	Status
Healey (SNF)	Comprehensive Risk Management and	Complete
	reporting process	
School Health	Consent process in new Electronic Health	Complete
	Record system, Frontline	
Aeromedical	Comprehensive Risk Management and	In process
(Air Ambulance)	reporting process	
LMC (Hospital)	Informed consent process	In process
CHC (Clinics)	Specimen labeling process/procedure	In process



Pharmacy	Release to bag process.	In process
GTS (Ground	Relocating risk assessment from Epic into	In process
Ambulance)	Baldwin (new system)	

- (Ongoing) Continuous ERM Staff and Program efforts (system-wide).
- (Complete) Healey Comprehensive review of risk management activities and risk reporting process: Significant improvement efforts have been made in regard to the Action Plan, including but not limited to completion of: staff training, system changes, new/change management processes, and new entries to RiskQual are now entered within 24 hours per HCD's Policy.
- (Ongoing) Aeromedical/Aviation Safety:

Ongoing efforts with Aeromedical/aviation safety management. Updates: New Baldwin Aviation Safety Management System Contract is fully executed; Risk team are collaborating with Aeromedical to implement and build the system to meet the organization's regulatory and risk reporting needs.

- (Complete) Risk/safety assessments and awareness through various survey efforts:
 - FY24 QI: Leadership Engagement and Program Satisfaction Survey completed with an overall rating of ERM: 4.6 out of 5.0 stars.
 - FY24 Q4: ERM conducted a system-wide Culture of Safety/AHRQ (Agency for Healthcare Research and Quality) Survey tailored to each business unit. Survey details and achievement of 90% participation rate was reported on at the last meeting. Analysis feedback will be provided at the next meeting. Briefly, some of the strengths identified included: A strong sense of teamwork throughout the organization; and Leadership places a strong emphasis on safety. Some of the opportunities for improvement included the need for reinforcement of reporting events; and Need for reinforcement of a just culture.
 - FY24 Q4: ERM distributed a voluntary Risk Management Awareness
 Survey to all HCD staff in August 2024. Details are copied below:

- The purpose was to help measure awareness of Risk Management. The survey provided education and information on the risk management program, and an additional mechanism to report any concerns in a confidential manner.
- Survey highlights:
 - 97% of employees are aware that HCD has a Risk Management Program.
 - 96% of employees believe HCD practices a "Just Culture" promoting a culture of safety and reporting throughout the organization.
 - 95% of employees know how to contact Risk Management.
 - 95% of employees feel comfortable reporting issues and concerns to any of the following: their Supervisor, Business Unit Leader/HCD Leadership, Human Resources, Compliance, Privacy, & Ethics Department, Legal Services, Risk Manager/RiskQual, and/or the Hotline.
 - 94% of employees are aware of the "Good Catch Program".

Confidential Patient Safety Work Product (PSWP) of the Health Care District of Palm Beach gathered within the HCD Patient Safety Evaluation System (HCD PSES) pursuant to the Patient Safety and Quality Improvement Act of 2005. The HCD PSES is the mechanism through which all information is received, collected, maintained, investigated, analyzed, and communicated for reporting to a Patient Safety Organization (PSO). This information is confidential and privileged from disclosure; it is not subject to discovery pursuant to F.S 395.0197, F.S. 400.147, F.S. 768.28 and the Patient Safety and Quality Improvement Act of 2005.

5. Fiscal Analysis & Economic Impact Statement:

	Current FY Amounts	Total Amounts (Current + Future)	Budget
Capital Requirements	N/A		Yes No
Net Operating Impact	N/A		Yes No

^{*}Non-budgeted expenditures in excess of \$250,000 require Finance and Audit Committee review and Board approval. Reviewed for financial accuracy and compliance with purchasing procedure:

N/A

Jessica Cafarelli

VP & Chief Financial Officer

6.	Reviewed/Approved by Committee:		
	N/A	N/A	
	Committee Name	Date Approved	
7.	Recommendation:		
	Staff recommends the Committee Receive Program Updates and Activities Report and	·	
	Approved for Legal sufficiency:		
	Gernabe Icaza		
	OCF6F7DB Be4Habe Icaza		
	SVP & General Counsel		
	Signed by:	Signed by:	
	Heather Bokor	Darcy Davis	
	4766F813A13Hetather Bokor	77A3B53¶9AMZY J. Davis	
	VP/Chief Compliance, Privacy &	Chief Executive Officer	

Risk Officer



HCD Enterprise Risk Management Dashboard

Q3 2024 (April - June)

Docusign Envelope ID: ECD33A09-8C6E-4031-9650-2B7E728BC304 OF PALM BEACH COUNTY Regulatory Reporting Location LMC PCC GTS **HCD** MEA PHA SCH 5 DAY Report: 6 AHCA Annual: None CODE 15 Report: FDA Report: None None DCF: 55 PCE: 1 TJC: None 36 (65%)

(25%)

(7%)

(2%)

SCH HEA PCC GTS PHA LMC HCD

Risk Management Dashboard

2024 Q3

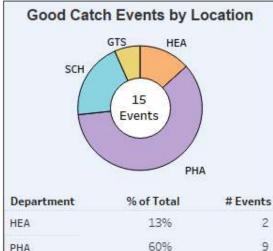
20%

7%

Events by Location

(Except Good Catch)

9



PHA



