

Westchester County Health Care Corporation
Audit & Corporate Compliance Committee Meeting

February 15, 2019

9:00 A.M.

Board Annex Room

COMMITTEE MEMBERS PRESENT: Mr. Heimerdinger
Mr. Tulis
Mr. Quintero
Mr. McCoy
Mr. Wishnie
Mr. Geist – via phone

STAFF PRESENT: Ms. Switzer
Mr. Brudnicki
Ms. Ariel
Mr. Ingber
Mr. Palovick

The Westchester County Health Care Corporation Audit and Corporate Compliance Committee met on February 15, 2019. The meeting was called to order at 9:00 a.m. by Mr. Heimerdinger, Chair. A Quorum was present.

MR. HEIMERDINGER ASKED FOR A MOTION TO APPROVE THE MINUTES FROM THE MEETING OF OCTOBER 19, 2018. MR. WISHNIE MOTIONED, SECONDED BY MR. QUINTERO. THE MOTION CARRIED UNANIMOUSLY.

2019 Corporate Compliance Risk Assessment Summary

Ms. Ariel reviewed for the Committee the 2019 Corporate Compliance Risk Assessment Summary Guide. She reviewed the 2018 Revenue Cycle Data Chart and explained that the DRGs in rust color were audited in 2017, the DRGs in blue were recently completed in 2018, and the DRGs in white are codes that are still out there and being identified in some areas, some are high risk and some are low risk. Ms. Ariel informed the Committee that approximately ten DRGs audits are performed each year.

A discussion ensued.

Ms. Ariel reviewed for the Committee the Medicare Case Mix; the FY 2018-2019 OIG Work Plan; FY 2019 OMIG Medicaid Work Plan; Government Data Trends; the Payment for Evaluating Payment Patterns Electronic Report (PEPPER); Government Data Trends; 2018-2019 Reimbursement Changes; ICD-10 Implementation; Corporate Compliance Risk Assessment Interviews; and the 2018 Compliance Investigation Trends Analysis.

Ms. Ariel advised the Committee that two other high risk areas identified during the 2017-2018 period are EMTALA and Opioids and Industry Discussion. She stated that during the 2017-2018 period there were emergency room transfers from other facilities to our facilities and vice versa. Ms. Ariel advised that in some of these cases, there had been potential to substantiated violation of this Act. She stated that due to increased reporting at WMC, we have determined this area is a risk that requires attention to increase review and education of all clinical staff. Ms. Ariel advised that the Corporate Compliance Office has included EMTALA auditing as a focal point for the 2019 year.

Ms. Ariel advised that there has been an outpouring of statistics regarding opioid use with data indicating overdoses at epidemic level. She stated that the Federal government, the CDC and many state agencies have opened up much discussion in addressing this industry issue. Ms. Ariel advised that the Compliance Office has included in its discussions opioid use and how it relates to WMC and its Network. She stated that Compliance Office will focus on taking a look at it pharmacy data and controlled substance record keeping, including security measures, and wastage. Ms. Ariel advised that diversion can occur when dealing with wastage of controlled substances.

A discussion ensued.

2019 Corporate Compliance and Internal Audit Work Plans

Ms. Ariel reviewed for the Committee the 2018 Work Plan Carryover audits for WMC. She noted that audits remain on the Work Plans until they are completed.

Ms. Ariel informed the Committee of the 2019 Corporate Compliance Audit Initiatives for WMC as follows: Telepsychiatry - MHRH; Inpatient Detox – MHRH; Certified Home Care – OASIS – MHRH; ICD-10 (Inpatient Coding and Documentation) – Valhalla and MHRH; EMTALA - Valhalla and MHRH; IRF – Valhalla; HIPAA Privacy – Valhalla and MHRH.

Ms. Ariel informed the Committee that there is a description of each audit initiative for both the 2018 carryover items as well as the 2019 initiatives.

Ms. Ariel informed the Committee of the 2019 Corporate Compliance Audit Initiatives for the Westchester Medical Center Advanced Physician Services (“APS”) as follows: Documentation and Coding Reviews of High Volume Providers (25 Providers).

Ms. Ariel reviewed the description of the 2019 APS audit initiative for the Committee.

Mr. Palovick reviewed the 2019 Internal Audit Work Plan Initiatives for WMC. He stated that he follows a similar process where he identifies risk perspectives associated with higher risk functions. Mr. Palovick informed the Committee that there is a description of each audit initiative on Diligent. He stated the audits include a good mix of financial, operational and information technology audits, as well as an audit of external auditor support and management requested reviews.

A discussion ensued.

MR. HEIMERDINGER ASKED FOR A MOTION TO APPROVE THE 2019 CORPORATE COMPLIANCE AND INTERNAL AUDIT WORK PLANS. MR. TULIS MOTIONED, SECONDED BY MR. QUINTERO. THE MOTION CARRIED UNANIMOUSLY.

Corporate Compliance Update:

Ms. Ariel advised the Committee that there are three audits in progress for WMC, and one audit in progress for APS.

Ms. Ariel advised the Committee that two Corrective Action Plans are delayed due to the approval of a policy and continuation of management discussions relating to implementation of improvements.

Ms. Ariel reviewed for the Committee the completed audit report for the Valhalla – Ambulatory Surgery Services Audit. She stated that the completed report is on Diligent.

Internal Audit Update:

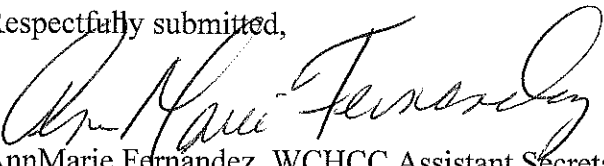
Mr. Palovick informed the Committee that there are three internal audits in progress for WMC as follows: Pharmacy Controlled Substances – MHRH; WMC Ambulatory Care Pavilion Construction Project; and Cardiology – APS.

MR. HEIMERDINGER ASKED FOR A MOTION TO MOVE INTO EXECUTIVE SESSION. MR. WISHNIE MOTIONED, SECONDED BY MR. TULIS. THE MOTION CARRIED UNANIMOUSLY.

The Committee moved out of Executive Session at 10:05 a.m.

No other business came before the Committee.

Respectfully submitted,



AnnMarie Fernandez, WCHCC Assistant Secretary