

The MetroHealth System Board of Trustees

AUDIT AND COMPLIANCE COMMITTEE

Wednesday, September 25, 2024

11:00 am – 1:00 pm

MetroHealth Main Campus, Building K, Board Room K107 or Zoom

Meeting Minutes

Committee Members Present: Maureen Dee-I, John Moss-I

Other Trustees Present: Sharon Dumas-I, Michael Summers-I, E. Harry Walker, MD-I

Staff Present: Christine Alexander, M.D.-I, Robin Barre-I, Chris Briddell-I, Phillip Brooks-I, Angela Campitelli-I, Nabil Chehade, M.D.-I, Kim Cunningham-R, William Dube, David Fiser-I, Joseph Golob, MD-I, Derrick Hollings-I, Olusegun Ishmael, MD-I, Barbara Kakiris-I, Ryan Mezinger-R, Chistina Morales-I, Sarah Partington-I, Allison Poullos-I, Tamiyka Rose-I, Ronald Walker-I, Dalph Watson-I, James Wellons-I, Darlene White-R, Mara Wilber-I

Invited Guests: Shrujal Patel-R, Sophie Cambell-Smith-R

Other Guests: Guests not invited by the Committee are not listed as they are considered members of the audience, and some were not appropriately identified.

Ms. Dee called the meeting to order at 11:00 am.

(The minutes are written in a format conforming to the printed meeting agenda for the convenience of correlation, recognizing that some of the items were discussed out of sequence.)

I. Approval of Minutes

The minutes of the July 31, 2024 Committee meeting was approved as submitted.

II. Information Items

A. Ethics & Compliance Update – C. Briddell / S. Partington

Ms. Dee introduced Chris Briddell, SVP Chief Ethics Risk & Compliance Officer and Sarah Partington, Senior Compliance Officer, to provide ethics and compliance program updates. Ms. Partington provided an overview of the compliance activity updates dashboard which reports 92% completion of the work plan year to date, and 85% completion of ethics and compliance policies reviewed and updated during the calendar



The MetroHealth System Board of Trustees

year. The MetroHealth ethics line reported 411 cases opened, 396 cases closed, 131 inquiries and 265 allegations. Ethics and compliance trainings to new hires year to date is fifty-eight and specialized trainings to date is 103.

Ms. Partington provided regulation updates. The Centers for Medicare and Medicaid Services (CMS) has issued their proposed and final payment rules for healthcare organizations, outlining reimbursement for inpatient stays, observation, and outpatient stays, as well as the physician fee schedule. The compliance team has collaborated with a multidisciplinary team to review the proposed rules and implement necessary changes before the rules go into effect. Two nondiscrimination rules have recently been released; one involving Section 1557 of the Affordable Care Act, which ensures patient access to care and focuses on interpreters, social services, and prevention of discrimination against patients. The second regulation concerns diagnostic equipment to ensure medical diagnostic equipment serves patient needs. An assessment of equipment inventory is in the beginning phase to ensure compliance guidelines are met. If compliance guidelines are not met, the teams will develop a plan to ensure compliance, as the deadline is two years to be in compliance with the rule.

The Department of Justice has released an evaluation of corporate compliance programs, which federal prosecutors use as a tool to determine if criminal charges will be filed against organizations. The evaluation tool focuses outlines guidance by answering three questions: is the corporation's compliance program well designed? Is the program being applied earnestly and in good faith? Is the compliance program work in practice? It delves deeper into aspects such as speak-up campaigns, anti-retaliation, artificial intelligence, and risk assessments. The changes are being reviewed and will be brought back to the committee in November.

In 2019, MetroHealth launched a Speak Up campaign to encourage employees to report issues and engage in conversations with their managers and other departments. The campaign was updated in 2022 with the Speak Up, Listen Up, Follow Up concept, which reiterated and encouraged employees to talk to management, Human Resources or Ethics and Compliance to report issues and reported concerns will be followed up by investigators. This year's new Speak Up campaign aims to focus on educating employees on where and how to report specific issues and encourages employees to report issues to managers. There will be a comprehensive communication plan and a reporting guide directing employees to other resources. There will be a poster developed in collaboration with Human Resources and Quality.



The MetroHealth System Board of Trustees

III. Executive Session

Ms. Dee asked for a motion to move into executive session to discuss hospital trade secrets as defined in ORC 1333.61. Dr. Walker made the motion and Mr. Moss seconded. The Board held a roll call vote with all Trustees in attendance voting to approve the motion to go into executive session for the purposes stated by Ms. Dee.

Members of the public were excused. The Board went into executive session to discuss the identified matters at 11:11 am.

Following the executive session, the meeting reconvened in open session at approximately 1:03 pm and welcomed back the public who attended in person and via Zoom.

IV. Recommendation/Resolution Approvals

A. Resolution to Authorize and Approve Hire of Executive Director, Internal Audit Services

Prior to the resolution vote, Ms. Dee explained that the special position will be reporting directly to the Audit and Compliance Committee, similar to the Board Liaison, who reports directly to the Board of Trustees. Ms. Dee requested a motion to approve the resolution to authorize and approve the hiring of the Executive Director of Internal Audit Services, which was given, seconded and the resolution was unanimously approved and will be presented to the full Board for approval.

There being no other business to bring before the Committee, the meeting was adjourned at approximately 1:04 pm.

THE METROHEALTH SYSTEM

Maureen Dee, Chairperson