

Westchester County Health Care Corporation
Audit & Corporate Compliance Committee Meeting

January 5, 2022

4:00 P.M.

Via Webex

COMMITTEE MEMBERS PRESENT: Mr. McCoy
Mr. Tulis
Mr. Heimerdinger
Mr. Quintero
Mr. Hochberg
Mr. Shroff
Mr. Israel

STAFF PRESENT: Ms. Switzer
Mr. Brudnicki
Ms. Campbell
Mr. Palovick

The Westchester County Health Care Corporation Audit and Corporate Compliance Committee met on January 5, 2022, via WebEx. The meeting was called to order at 4:00 p.m. by Mr. McCoy, Chair. A Quorum was present.

MR. MCCOY ASKED FOR A MOTION TO APPROVE THE MINUTES FROM THE MEETING OF OCTOBER 15, 2021. MR. QUINTERO MOTIONED, SECONDED BY MR. HEIMERDINGER. THE MOTION CARRIED UNANIMOUSLY.

2022 Corporate Compliance Risk Assessment Summary

Ms. Campbell reviewed for the Committee the 2022 Corporate Compliance Risk Assessment Summary Guide, and stated that a COVID-19 section was added again this year to include information on the pandemic. She reviewed the 2021 Revenue Cycle Data Chart and explained that some of the DRGs highlighted were audited in 2020 and 2021, 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.

A discussion ensued.

Ms. Campbell reviewed for the Committee the Medicare Case Mix; the FY 2021 OIG Work Plan; FY 2021 OMIG Medicaid Work Plan; Government Data Trends; the Payment for Evaluating Payment Patterns Electronic Report (PEPPER); 2020-2021 Reimbursement Changes; the 2019-2021 Compliance Investigation and Advice Trends Analysis Summary and the 2019-2021 Internal Audit and Compliance Audit Trend Analysis Summary. She also gave an overview of Westchester Medical Center Advanced Physician Services (“WMCAPS”).

A discussion ensued.

2022 Corporate Compliance and Internal Audit Work Plans

Ms. Campbell reviewed the 2022 Audit Initiatives for both the Valhalla and MHRH campuses, as well as WMCAPS. She stated that there are detailed descriptions of each audit initiative contained on Diligent.

Mr. Palovick reviewed the 2022 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 internal 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. MCCOY ASKED FOR A MOTION TO APPROVE THE 2022 CORPORATE COMPLIANCE AND INTERNAL AUDIT WORK PLANS. MR. TULIS MOTIONED, SECONDED BY MR. SHROFF. THE MOTION CARRIED UNANIMOUSLY.

Corporate Compliance Update:

Ms. Campbell provided a Compliance Annual Update to the Committee. She reviewed the Compliance investigations, the HIPAA Privacy investigations and the Compliance Advices for the period 2019-2021. Ms. Campbell advised the Committee of the 2021 Compliance audits, which included DRG audits and governmental audits. She also discussed the 2021 Focused Educational Sessions, which included HIPAA Privacy, EMTALA, Compliance, Documentation, and Coding/Billing.

Ms. Campbell advised the Committee of the 2022 Network Compliance Strategic Plan. She stated that the Strategic Plan consists of Communications, Education, and Auditing/Monitoring to continue to increase culture of compliance across the Network.

Ms. Campbell advised the Committee of the following hospital audits in progress: DRG 895/897 – Alcohol/Drug Abuse or Dependence w/without Rehabilitation Therapy w/o MCC – MHRH; DRG 203 – Bronchitis and Asthma w/o CC/MCC; and Outpatient Infusion Center – MHRH. She stated that there is a Modifier 24 – Post-Operative Unrelated E&M Services audit in progress for WMCAPS.

Ms. Campbell advised the Committee of the following completed hospital audits: Coding Review DRG 602 – Cellulitis with MCC and DRG 603 – Cellulitis without MCC – Valhalla and MHRH, and Two Midnight Rule – Valhalla.

Ms. Campbell advised that the following WMCAPS audits were completed: High Volume Provider Documentation and Coding Review CPT-4 codes – ENT, and COVID-19 Telehealth Services.

Ms. Campbell discussed the following hospital Corrective Action Plans (“CAP”): Outpatient Substance Abuse – MHRH, and Inpatient Rehab Facility – MHRH. She discussed the CAP for the WMCAPS High Volume Provider Documentation and Coding Review CPT 99223 (initial hospital visit) and 99233 (subsequent hospital visit) – Cardiology Kingston. She stated that all reports are on Diligent.

Internal Audit Update:

Mr. Palovick informed the Committee of the following three internal audits in progress: Outpatient Lab Revenue Cycle, System User Provisioning/De-Provisioning, and Payroll Differentials.

Mr. Palovick reviewed for the Committee the following two completed internal audits: the Credentialing Process – WMC and High Dollar Items – MHRH. He stated that the reports are on Diligent.

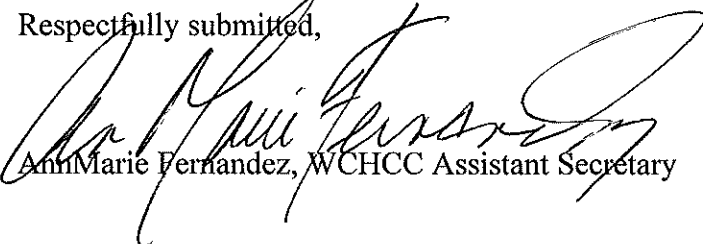
MR. MCCOY ASKED FOR A MOTION TO MOVE INTO EXECUTIVE SESSION. MR. HOCHBERG MOTIONED, SECONDED BY MR. SHROFF. THE MOTION CARRIED UNANIMOUSLY.

MR. MCCOY MOTIONED TO MOVE INTO EXECUTIVE SESSION WITHOUT MANAGEMENT, MR. TULIS SECONDED. THE MOTION CARRIED UNANIMOUSLY.

The Committee moved out of Executive Session at 4:50 p.m.

No other business came before the Committee.

Respectfully submitted,



Ann Marie Fernandez, WCHCC Assistant Secretary