

Westchester County Health Care Corporation  
Audit & Corporate Compliance Committee Meeting

January 15, 2021

9:00 A.M.

Webex

COMMITTEE MEMBERS PRESENT: Mr. Heimerdinger  
Mr. Tulis  
Mr. Israel  
Mr. Quintero  
Mr. Hochberg  
Mr. Geist  
Mr. Flannery  
Mr. Wishnie  
Mr. Rosenblut  
Mr. McCoy

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

The Westchester County Health Care Corporation Audit and Corporate Compliance Committee met on January 15, 2021. 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 16, 2020. MR. QUINTERO MOTIONED, SECONDED BY MR. MCCOY. THE MOTION CARRIED UNANIMOUSLY.

#### 2021 Corporate Compliance Risk Assessment Summary

Ms. Ariel reviewed for the Committee the 2020 Corporate Compliance Risk Assessment Summary Guide, and stated that a COVID-19 section was added this year to include information on the pandemic. She reviewed the 2020 Revenue Cycle Data Chart and explained that some of the DRGs highlighted were audited in 2019 and 2020, 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. Ariel reviewed for the Committee the Medicare Case Mix; the FY 2020 OIG Work Plan; FY 2020 OMIG Medicaid Work Plan; Government Data Trends; the Payment for Evaluating Payment Patterns Electronic Report (PEPPER); Government Data Trends; 2019-2020 Reimbursement Changes; Corporate Compliance Risk Assessment Interviews; and the 2020 Compliance Investigation Trends Analysis.

A discussion ensued.

#### 2020 Corporate Compliance and Internal Audit Work Plans

Ms. Ariel reviewed for the Committee the 2020 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 2021 Corporate Compliance Audit Initiatives for WMC as follows: ICD-10 (Inpatient Coding and Documentation) Valhalla and MHRH; COVID-19; Telepsychiatry - Valhalla; and 2 Midnight Rule - Valhalla.

Ms. Ariel informed the Committee that there is a description of each audit initiative for both the 2020 carryover items as well as the 2021 initiatives.

Ms. Ariel informed the Committee of the 2021 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); COVID-19; and Modifier 24 – Post Operative Unrelated Services.

Ms. Ariel reviewed the description of the 2021 APS audit initiative for the Committee.

Mr. Palovick reviewed the 2021 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 2021 CORPORATE COMPLIANCE AND INTERNAL AUDIT WORK PLANS. MR. TULIS MOTIONED, SECONDED BY MR. HOCHBERG. THE MOTION CARRIED UNANIMOUSLY.

Corporate Compliance Update:

Ms. Ariel advised the Committee of the following hospital audits in progress: Outpatient Substance Abuse - MHRH; Inpatient Rehab Facility – MHRH; DRG Coding Review Medical Back - Valhalla; HIPAA Privacy Audit – MHRH & Valhalla; and Coding and Assessment of Outpatient Laboratory Services – Valhalla.

Ms. Ariel advised the Committee of the following APS audits in progress: High Volume Provider Documentation and Coding Review CPT-4 Codes – GI; High Volume Provider Documentation and Coding Review CPT-4 Codes – ENT; High Volume Provider Documentation and Coding Review CPT- 99223 and 99233 Codes – Cardiology Kingston; and High Volume Provider Documentation and Coding Review CPT-99214 – Nephrology – 2 providers and Neurology – 1 provider.

Ms. Ariel discussed the findings of the hospital audit DRG 193 and 194 Coding Review Simple Pneumonia – Valhalla with the Committee.

Ms. Ariel advised that the following APS audits were completed: High Volume Provider Documentation and Coding Review CPT-99214, Moderate Complexity Office/Outpatient Visit; High Volume Provider Documentation and Coding Review CPT-99291 and 99292 – Critical Care Services; High Volume Provider Documentation and Coding Review CPT-99215 – Hematology/Oncology; and High Volume Provider Documentation and Coding Review CPT-20610 – Arthrocentesis Orthopedics.

Ms. Ariel discussed the following Corrective Action Plans: Inpatient Rehabilitation Facility – Valhalla; Inpatient Substance Abuse Detox – MHRH; and Medical Record Coder Assessment Audit. She stated that all reports are on Diligent.

Internal Audit Update:

Mr. Palovick informed the Committee of the following two internal audits in progress: Blood Bank and Gift Shop – WMC.

Mr. Palovick reviewed for the Committee the following two completed internal audits: Physical Medicine and Rehabilitation Revenue Cycle and Environmental Services – Contract Administration. He stated that the reports are on Diligent.

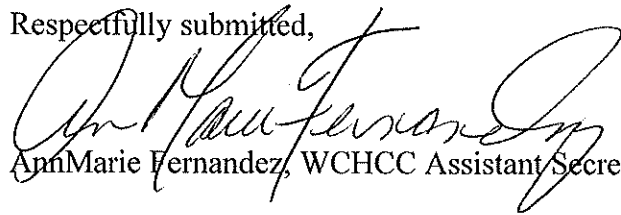
MR. HEIMERDINGER ASKED FOR A MOTION TO MOVE INTO EXECUTIVE SESSION. MR. HOCHBERG MOTIONED, SECONDED BY MR. ISRAEL. THE MOTION CARRIED UNANIMOUSLY.

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

The Committee moved out of Executive Session at 9:45 a.m.

No other business came before the Committee.

Respectfully submitted,



AnnMarie Fernandez, WCHCC Assistant Secretary