Joint Conference Committee

Regulatory & Compliance Reports

December 1, 2024 – February 25, 2025

Presented on March 13, 2025

The Heart of a Healthy Community™

ARROWHEAD
REGIONAL MEDICAL CENTER

Regulatory Activity Update December 2024 – February 2025

- ARMC underwent the following regulatory visits from December 1, 2024, through February 28, 2025:
  - California Department of Public Health
    - Eleven (11) CDPH visits:
      - Twenty-one (21) cases resulting from self-reports, and/or from employees or other anonymous sources that were investigated
  - San Bernardino County Fire Protection District CUPA Inspection
    - One (1) Medical/Hazardous Waste CUPA inspection
- ARMC did not receive a deficiency requiring a corrective action plan during this reporting period.
- Licensing Surveys
  - Pending Breath Mobile #1 application approval
- The Joint Commission (TJC)
  - Preparation for our triennial visit is underway
  - Sentinel Events
    - No reported sentinel events for the reporting period

- **Interpreter Services:**
  - ARMC continues the use of Hanna Interpreter Services for American Sign Language
  - ARMC continues to utilize CyraCom for its interpretation services
    - Cyracom provides interpreters in over 200 languages via video, phone, and in-person interactions
  - ARMC continues to conduct monthly audits to ensure patients were provided aid or in interpreter in a timely manner for patients who are deaf and/or hard of hearing
    - Call times and language wait times are monitored

Compliance Program/Activity

- **Opportunities for Improvement for Interpreter Services:**
  - Offering Medically Qualified Interpreter (MQI) testing opportunities to ARMC staff
  - Accepting external MQI certifications
  - Reporting to vendor (Cyracom) and IT all instances in which there are integrity and quality issues with the communication
  - Documenting instances of concern with interpreters (noise, distractions, interpretation quality)
  - Ensuring that areas are properly equipped with phones, video remote interpretation, etc
  - Collaboration with Nursing Leadership to incorporate Interpretive Services into Nursing Orientation/Onboarding training
  - Provide refresher training to staff who are unable to recall how to request interpretive services or locate equipment

Compliance Program/Activity

- **Opportunities for Improvement for Interpreter Services:**
  - Clarifying conversational interpretation versus medically qualified interpretation
  - Ensuring proper pay codes are used for bilingual and MQI staff
  - Increase the utilization of Ipads
  - Utilizing Hanna Interpretive Services for ASL instead of Cyracom
- **Form 700 Implementation**
  - The Residency Department was added as Form 700 Filers.
  - Oversee annual Form 700 filing for Physicians, Staff and Contracted Employees. Due April 1, 2025.

Compliance Program/Activity

- **Compliance Program Review:**
  - Continue the monthly review of the Office of Inspector General (OIG) exclusion list to ensure vendors and staff are not excluded from Federally funded health care programs (Ongoing).
  - There were no incidents of Fraud, Waste or Abuse reported for this reporting period.

ARROWHEAD REGIONAL MEDICAL CENTER
The Heart of a Healthy Community
www.arrowheadmedcenter.org

Health Insurance Portability and Accountability Act (HIPAA) Privacy & Security Report Highlights

- ARMC completed the review of Privacy Rule Changes effective December 23, 2024
  - Policies and Procedures are being updated to reflect the new restrictions on the disclosure of reproductive health information sought for the purposes of:
    - Healthcare Oversight
    - Judicial and Administrative Proceedings
    - Law Enforcement
    - Certain Coroner and Medical Examiners Purposes
  - Additional updates to Policies and Procedures include:
    - Attestation required for these purposes when the information contains "potential" information related to reproductive health care
    - Requestor must attest that the information will not be used to investigate or impose liability on the individual for merely seeking/providing lawful reproductive healthcare

ARROWHEAD REGIONAL MEDICAL CENTER
The Heart of a Healthy Community
www.arrowheadmedcenter.org

Health Insurance Portability and Accountability Act (HIPAA) Privacy & Security Report Highlights

- Epic Hyperdrive Local install rollout strategies are currently in progress hospital-wide, with approximately 80% completion. We expect to complete them in the first quarter of 2025.

- The migration to a cloud-based environment of ARMC's enterprise data security platform (Varonis) has been completed. Varonis's cloud environment provides better data classification, automations, and includes access to the Managed Data Detection and Response (MDDR) team.

- The technical implementation of SAFEQ, a new cloud-based printing solution is currently in progress. SAFEQ will consolidate all HP network printing, as well as all 160 Konica Minolta Multi Function Printers (MFP's) into one platform. SAFEQ will provide "Secure Printing" that will include HIPAA filters to prevent data loss.

HIPAA Reportable Breaches

- There were 2 reportable breaches for the report period.