

Joint Conference Committee

Compliance Activity Report

**June 1, 2025 –
August 31, 2025**



Presented on September 25, 2025

*The Heart of a Healthy
Community™*



Compliance Program/Activity – Regulatory & Accreditation

- **ARMC underwent the following regulatory visits during this reporting period:**
 - Emergency Medical Treatment and Labor Act Survey (EMTALA)
 - 6/12 & 6/13 – Complaint (ED) (no findings)
 - Centers for Medicare and Medicaid (CMS) Survey
 - 7/7 – Patient Rights Survey (ED Pain Assessment)
 - College of American Pathology Inspection
 - 7/31 – Bi-annual inspection
 - California Department of Public Health (CDPH)
 - Seven (7) CDPH visits:
 - Nineteen (19) cases resulting from self-reports, and/or from employees or other anonymous sources that were investigated
 - CDPH deficiency(ies) requiring a corrective action plan:
 - Pain Assessment
 - Self-Reported Hospital Acquired Pressure Injuries (Medical Device)

Compliance Program/Activity – Regulatory & Accreditation

- **Hospital Licensing Surveys**
 - Breath Mobile #1 – Licensing Survey Completed and Approved (7/24/2025)
 - Cardiac Clinic move to Fontana Clinic Location – Pending CDPH application approval
 - Behavior Health Adolescent Unit – Pending CDPH Licensing Survey (scheduled for 9/26/25)

- **The Joint Commission (TJC) Triennial Accreditation Visit**
 - Preparation for our triennial visit is underway
 - Sentinel Events - No reported sentinel events for the reporting period

Compliance Program/Activity – Interpreter Services

■ Interpreter Services:

- 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 with zero fallouts
- Interpreter Services Audits were conducted (In-Patient and Out-Patient Units)

■ Opportunities for Improvement for Interpreter Services

- CyraCom was officially purchased by Propio on July 1st
- Video Interpreter Services went Live in Epic on August 28th
- Full migration to Propio is scheduled to happen end of October 2025
- Propio will allow access to a national pool of Interpreters, over 350 languages and faster connection times, option of male or female interpreters, and strict standards to ensure ethic and HIPAA requirements are followed.

Compliance Program/Activity – Interpreter Services

- **Opportunities for Improvement for Interpreter Services:**
 - Offering Medically Qualified Interpreter (MQI) testing opportunities to ARMC staff
 - Accepting external MQI certifications
 - Reporting to vendor 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

Compliance Program/Activity – Interpreter Services

■ Opportunities for Improvement for Interpreter Services Cont.:

- Provide refresher training to staff who are unable to recall how to request interpretive services or locate equipment
- Clarify conversational interpretation versus medically qualified interpretation
- Ensure proper pay codes are used for bilingual and MQI staff
- Increase the utilization of Ipads
- Utilizing Hanna Interpretive Services for ASL

Compliance Program/Activity – Waste/Fraud/Abuse

- **CMS Price Transparency Warning Notice**
 - Compliance review to ensure that ARMC provides price information publicly pursuant to 45 § C.F.R. 180.20
 - Received on 8/6/2025, due by 11/5/2025
- **Ongoing Compliance Program Review**
 - Policy review and/or improvements to ensure Immigration and Law Enforcement Compliance
 - 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 zero incidents of Fraud, Waste or Abuse reported for this reporting period.

Compliance Program/Activity – HIPAA Privacy

- Updates finalized for ARMC Privacy Notice
 - Implementation will occur no later than by December 31, 2025
- Business Associate Agreement Audit complete
 - Corrective Action Plan reviewed and issued to Materials Management.
- There were 3 reportable breaches for the report period.
 - 6/10 - EKG Results were inadvertently faxed to the wrong number for 5 patients.
 - 7/8 - RN from 5 South accessed the EMR without authorization and requested records printed out from another nurse (HR Investigation in progress)
 - 8/11 - RN from ARMC BH, inadvertently mixed paperwork from one patient into the DC paperwork of another patient

Compliance Program/Activity – HIPAA Security

- ARMC is taking several measures to address HIPAA concerns with the use of AI. The organization is aligning its cybersecurity practices with the National Institute of Standards and Technology (NIST) Cybersecurity Framework to ensure HIPAA compliance. This includes identity management, authentication management, and privilege access management. Additionally, ARMC is collaborating with the Office of the CISO and County Counsel to develop AI policies that address HIPAA-related concerns. This collaboration will ensure that all future AI implementations at ARMC are compliant with HIPAA regulations and protect sensitive patient data.
- ARMC has recently procured PRIVACYPRO from BLUESIGHT (formerly known as Protenus). This solution integrates with Epic EHR to enhance patient data privacy and compliance monitoring. This integration will enable ARMC to proactively detect and address potential privacy violations and insider threats. The project implementation has started and will involve several departments at ARMC within the next few months.

Compliance Program/Activity – HIPAA Security

- Epic Hyperdrive Local install rollout strategies is complete, except for patient registration where a new signature pad (Topaz) is being tested to replace the existing Wacom solution. Once this new hardware/software integration is completed, Epic Local will be deployed to patient registration.
- The Windows 11 upgrade at ARMC is currently in the pilot testing phase. Plans are being finalized for a full rollout over the next few months. This initiative involves thorough testing and coordination among various departments and Epic, to ensure a smooth transition.
- 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.



Questions?

