



Job Code: 8021
Grade: 24
HCWR: N

Job Title
Compliance Counsel

Department
Compliance

This position is exempt from Career Service under the CCH Personnel Rules.

Job Summary

The Compliance Counsel reflects the mission and vision of Cook County Health (CCH) adheres to the organization's Code of Conduct and Corporate Compliance Program, and complies with all relevant policies, procedures, guidelines and all other regulatory and accreditation standards. The Compliance Officer will report to and work closely with the Chief Compliance Officer. Provides advice, guidance, and assistance to CCH Corporate Compliance.

General Administrative Responsibilities

Collective Bargaining

- Review applicable Collective Bargaining Agreements and consult with Labor Relations to generate management proposals
- Participate in collective bargaining negotiations, caucus discussions and working meetings

Discipline

- Document, recommend and effectuate discipline at all levels
- Work closely with labor relations and/or labor counsel to effectuate and enforce applicable Collective Bargaining Agreements
- Initiate, authorize and complete disciplinary action pursuant to CCH system rules, policies, procedures and provision of applicable collective bargaining agreements

Supervision

- Direct and effectuate CCH management policies and practices
- Access and proficiently navigate CCH records system to obtain and review information necessary to execute provisions of applicable collective bargaining agreements

Management

- Contribute to the management of CCH staff and CCH' systemic development and success
- Discuss and develop CCH system policies and procedures
- Consistently use independent judgment to identify operational staffing issues and needs and perform the following functions as necessary; hire, transfer, suspend, layoff, recall, promote, discharge, assign, direct or discipline employees pursuant to applicable Collective Bargaining Agreements
- Work with Labor Relations to discern past practice when necessary



Typical Duties

- Serves in a leadership capacity to guide the system-wide compliance program in regulatory matters in conjunction with the Chief Compliance Officer
- Responsible for CCH Corporate Compliance's contract review and approval process for adherence with state and federal fraud and abuse laws.
- Develops CCH Corporate Compliance's fair market value and commercial reasonableness review for professional service agreements and other values-based arrangements.
- Supports research compliance efforts by developing a clinical trial coverage analysis process to support clinical trial budgeting, billing and compliance.
- Serves in a leadership capacity to develop compliance requirements for health plan services' new lines of business. Additionally, provides compliance oversight of existing health plan services' lines of business.
- Provides advice and assistance to the CCH Compliance Program as requested, through the interpretation of new and emerging healthcare compliance guidance, laws, and regulations. Communicates relevant information to the Chief Compliance Officer and the CCH Compliance team
- Partners with the Compliance Officer to review and synchronize system-wide compliance program materials and messaging to present a uniform approach while adhering to regulatory requirements
- Assesses, develops, and updates CCH Corporate Compliance's policies and procedures relevant to clinical trial compliance, and fraud abuse laws
- Performs system-wide interviews with all key personnel to validate compliance with established policies and procedures and applicable regulations in conjunction with other personnel, as deemed necessary
- Prepares and analyzes a narrative description of the process or function under review in order to evaluate potential strengths and weaknesses and to determine the adequacy of the overall system to ensure compliance, as deemed necessary
- Develop reports upon completion of each compliance review, which details recommendations designed to correct any potential weaknesses or areas of non-compliance discovered during the review
- Perform compliance interviews and investigate reports of alleged non-compliance to determine the validity, nature and scope of the report in conjunction with the designated team members, as identified by the Chief Corporate Compliance Officer
- Collaborates with operational areas to remediate concerns through action plans to correct potential weaknesses and assure ongoing compliance
- Develop Compliance Reports during the course of the investigation and subsequent to the completion of the investigation under the auspices of the Chief Corporate Compliance Officer, and Legal Counsel if deemed necessary

Reporting Relationship

Reports to the Chief Corporate Compliance & Privacy Officer

Minimum Qualifications

- Graduation from an accredited School of Law with a Juris Doctorate (JD) degree



Minimum Qualifications

- Five (5) years of experience in giving legal counsel or compliance counsel to health entities and/or health care providers

Preferred Qualifications

- Certification in Healthcare Compliance (CHC) credentials
- Master's Degree or Ph.D. in Healthcare, Healthcare Administration, Public Administration, Science, or related field
- Practical experience working with healthcare corporate compliance laws and regulations, including privacy and security regulations and fraud, waste, and abuse laws

Knowledge, Skills, Abilities and Other Characteristics

- Strong interpersonal skills: for building relationships with internal clients at all levels of the organization
- Demonstrate respect and sensitivity for cultural diversity, gender differences, and sexual orientation of patients and coworkers
- Excellent written and verbal communication skills
- Detail oriented
- Flexibility and adaptability in performing work duties, managing multiple and competing priorities and coordinating diversified efforts
- Ability to prioritize work with minimal supervision and use time effectively. Requires high degree of follow-through despite frequent interruptions. Possess ability to work in a fast-paced environment, which requires handling multiple tasks at once.

Physical and Environmental Demands

This position is functioning within a healthcare environment. The incumbent is responsible for adherence to all hospital and department specific safety requirements. This includes but is not limited to the following policies and procedures: complying with Personal Protective Equipment requirements, hand washing and sanitizing practices, complying with department specific engineering and work practice controls and any other work area safety precautions as specified by hospital wide policy and departmental procedures.

The above statements are intended to describe the general nature and level of work being performed by people assigned to this classification. They are not intended to be construed as an exhaustive list of all responsibilities, duties and skills required of the personnel so classified.

For purposes of the American with Disabilities Act, "Typical Duties" are essential job functions.