



Job Code: 8023

Grade: 24

HCWR: N

Job Title

Chief Corporate Compliance & Privacy Officer

Department

Administration

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

Job Summary

Under the direction of the Cook County Health (CCH) Board of Directors through the Audit and Compliance Committee of the Board, and the Chief Executive Officer, the Chief Corporate Compliance & Privacy Officer oversees the Corporate Compliance Program and the Health Insurance Portability and Accountability Act (HIPAA) Privacy Program for CCH. CCH encompasses both a health plan and provider component, with the Chief Corporate Compliance & Privacy Officer overseeing both operations. The Chief Corporate Compliance & Privacy Officer functions independently and objectively to review and evaluate compliance issues / concerns within the organization. Reviews applicability of local, state and federal rules and regulations of regulatory agencies that policies and procedures are being followed and that behavior in the organization meets the CCH Code of Ethics.

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



General Administrative Responsibilities

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

- Provides oversight and guidance to the Board of Directors, Chief Executive Officer and senior management on matters relating to compliance.
- Monitors and reports results of organizational compliance/ethics efforts. Authorized to implement all necessary actions to ensure achievement of the objectives of an effective compliance program.
- Monitors the performance of the Compliance Program and related activities, internally throughout CCH and externally for delegated entities, taking appropriate steps to improve effectiveness.
- Develops, initiates, maintains and revises policies, procedures and practices for the general operation of CCH and its related activities including those to ensure compliance with the CCH Managed Care Community Network (MCCN) Agreement with Healthcare Family Services (HFS).
- Develops and periodically reviews and updates Code of Ethics to ensure continuing relevance in providing guidance to management and the workforce.
- Responds to alleged violations of rules, regulations, policies, procedures and the CCH Code of Ethics by evaluating or recommending the initiation of investigative procedures.
- Acts as an independent review and evaluation body to ensure that compliance issues/concerns evaluated, investigated and resolved, which may include reporting of violations or potential violations to duly authorized enforcement agencies as appropriate and/or required.
- Identifies potential areas of compliance vulnerability and risk; monitors operational corrective action plans for resolution of problematic issues, and provides general guidance on how to avoid or deal with similar situations in the future.
- Establishes and monitors a system to log, track and maintain documentation for all concerns/issues raised to Corporate Compliance.
- Institutes and maintains an effective compliance communication program for the organization, that includes (a) promoting the use of the compliance hotline or other mechanisms for communicating with Corporate Compliance; (b) emphasizing to leadership, employees, and workforce members reports of suspected fraud and other improprieties should be made without fear of retaliation; (c) heightening awareness of the Code of Ethics; and (d) understanding new and existing compliance issues and related policies and



Typical Duties

procedures.

- Works with CCH Human Resource Department and other as appropriate to develop, implement, maintain and document an effective compliance training program, including appropriate introductory training for new workforce members as well as ongoing training for all workforce members and managers
- Guides and partners with operational leadership to facilitate operational ownership of compliance. Consults with legal counsel as needed and independently to resolve difficult compliance issues.
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- Collaborates with operational areas throughout the organization to direct compliance issues to appropriate channels for investigation and resolution.
- Performs other duties as assigned.

Reporting Relationship

Reports to the Chief Executive Officer with dual reporting to the CCH Board Chair

Minimum Qualifications

- Master's degree from an accredited institution with a Certification in Healthcare Compliance (CHC) OR a Juris Doctorate (JD) degree
- Five (5) years of experience in healthcare to include demonstrated leadership
- Five (5) years of leadership experience, preferably in a Senior Director, Executive Director, Vice President, Chief or other related role
- Five (5) years of experience managing a compliance program for a large health system
- Seven (7) years of experience conducting complex investigations

Preferred Qualifications

- Any one of the following professional, valid and active certification(s) / license(s):
- Registered Health Information Administrator (RHIA)
- Registered Nurse licensed in the State of Illinois
- Certified Public Accountant (CPA)
- Certified Financial Examiner (CFE)

Knowledge, Skills, Abilities and Other Characteristics

- Thorough knowledge of compliance and privacy standards and associated law, rules and regulations ability to develop and maintain an effective compliance program.
- Establishes and provides direction and management of a system compliance hot line.
- Exceptional verbal and written communication skills necessary to communicate with all levels of staff and a patient and member population composed of diverse cultures and age groups
- Excellent program development, management and leadership skills
- Demonstrate analytical and organizational, problem-solving, critical thinking and conflict
- Consistently uses independent judgment



Knowledge, Skills, Abilities and Other Characteristics

- Demonstrates attention to detail, accuracy and precision

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.