



Job Code: 8082

Grade: 24

HCWR: N

Job Title
Privacy Officer

Department
Compliance

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

Job Summary

The Privacy Officer 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 Privacy Officer is responsible for the ongoing development, implementation, maintenance, and evolution of CCH's privacy program and all related privacy activities.

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 role to develop a system-wide privacy program, encompassing both the provider side and plan side, as part of the system's compliance program
- Synchronizes system-wide privacy program materials and messaging to present a uniform message
- Develops strong system-wide practices in accordance with Federal, state, and local laws, rules, and regulations through privacy policies and procedures
- Assesses, evaluates, implements, maintains, and updates CCH's information privacy policies and procedures
- Conducts complex privacy investigations with independence and ability to provider oversight to peers doing the same
- Leads planning, development, and implementation of system-wide privacy risk assessment program, including plans for auditing and monitoring
- Provides regular guidance to key stakeholders on appropriate uses and disclosures of information
- Serves as a resource and subject matter expert on appropriate committees throughout CCH
- Reviews and updates CCH's template business associate agreement on a regular basis to remain current.
- Serves as lead reviewer for privacy-related agreements, including but not limited to contracts, data use agreements, data sharing agreements, and business associate agreements
- Establishes a structured process for regulatory review, monitoring, and dissemination of pertinent information to key stakeholders. Modifies policies, procedures, and projects to reflect changes in laws and regulations
- Develops and coordinates privacy projects with CCH provider and plan entities
- Oversees, directs, delivers, or ensures delivery of privacy education, training, and orientation to all workforce members
- Establishes and administers a process for receiving, documenting, tracking, investigating, and taking action on all privacy complaints. Collaborates with operational areas to remediate concerns
- Maintains highest levels of confidentiality regarding all departmental operations - in communication both verbal and written and with the use of technology
- Additional Functions
- Composes and prepares complete and accurate compliance program materials (material is defined but not limited to the following examples: documents, memorandum, meeting minutes and agendas, narrative and statistical reports, presentations, projects, overheads, slides, graphs, charts, and listings) within designated time parameters
- 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

Reporting Relationship

Reports to the Chief Corporate Compliance & Privacy Officer



Minimum Qualifications

- Master's Degree from an accredited college or university (or higher-level degree)
- Three (3) years of recent experience in privacy including program analysis, training and/or policy development
- Three (3) years of conducting complex healthcare privacy investigations
- Three (3) years of recent experience in one or more of the following:
 - hospital or large multi-specialty clinic setting
 - consulting or law firm specializing in healthcare
 - governmental agency focused on healthcare
 - o
 - an insurance company working in healthcare claims or compliance

Preferred Qualifications

- Juris Doctor (JD) from an accredited college or university
- Compliance and/or privacy certification, including by not limited to Certified in Healthcare Compliance (CHC), Certified in Healthcare Compliance-Privacy (CHPC), Certified Information Privacy Professional (CIPP/US)

Knowledge, Skills, Abilities and Other Characteristics

- Leadership competencies to include planning and organizing, problem solving, informing, consulting, supporting, and networking
- Project Management experience and exceptional organizational skills
- Extensive Report Development experience & Policy & Procedure development experience
- Knowledge of Health Care Regulatory standards and accreditation agencies, especially those affecting privacy and security
- Experience in Public Speaking and Business Presentations
- Highly developed software application skills - MS Office Access, Excel, PowerPoint, and Word
- Behavioral commitment to quality work and customer service philosophy
- Strong communication skills - written and verbal; skilled in partnership development and conflict resolution
- 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
- Detail oriented
- Flexibility and adaptability in performing work duties, managing multiple and competing priorities and coordinating diversified efforts
- Ability to travel to and from any CCHHS entity, including the Ambulatory Clinics and Cook County entities/offices



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.