Standard Job Description

Job Title
Compliance Officer, CountyCare

Department
Compliance

Job Summary
The Compliance Officer reflects the mission and vision of Cook County Health & Hospitals System (CCHHS) 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 is responsible for the ongoing development, implementation, maintenance, and evolution of the CCHHS compliance program and all related compliance activities. This includes, but is not limited to, the development and subsequent assessment of comprehensive policies and procedures, protocols, compliance training, and internal investigations.

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

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 CCHHS system rules, policies, procedures and provision of applicable collective bargaining agreements

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

Management
- Contribute to the management of CCHHS staff and CCHHS’ systemic development and success
- Discuss and develop CCHHS system policy and procedure
**General Administrative Responsibilities continued**

- 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**

- Oversight of the Health Plan’s Program Integrity Program; Special Investigations Unit; and the fair hearing process to ensure that Fraud, Waste and Abuse is reported in accordance with regulatory and contractual guidelines
- Serves in a leadership capacity to develop the system-wide compliance program in conjunction with the Chief Compliance Officer
- Collaborates with operational leadership to facilitate operational ownership of compliance
- Synchronizes system-wide compliance program materials and messaging to present a uniform approach
- Oversees, directs, delivers, or ensures delivery of compliance training, both global and specialty, for employees, physicians, volunteers, students, vendors, and consultants
- Assesses, evaluates, implements, maintains, and updates CCHHS compliance policies and procedures
- Establishes a structured process for regulatory review, monitoring, and dissemination of information. Modifies policies, procedures, and projects to reflect changes in laws and regulations
- Develops and coordinates compliance projects with CCHHS system entities as delineated in the Compliance Program Annual Work Plan and perform prospective reviews in conjunction other personnel as deemed necessary, and as determined by the Chief Corporate Compliance & Privacy Officer
- 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 Follow-Up reviews as generated by the Compliance Program Work Plan to ensure action plans have been adequately implemented
- Assure that Compliance Program reports are produced for the Chief Executive Officer, Board of Directors, and/or the Audit and Compliance Committee of the Board of Directors, as directed by the Chief Corporate Compliance Officer
- Establishes and administers a process for receiving, documenting, tracking, investigating, and taking action on all compliance concerns
- 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 & Privacy Officer
Typical Duties continued
- 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 & Privacy Officer, and Legal Counsel if deemed necessary
- Maintains highest levels of confidentiality regarding all departmental operations – in communication both verbal and written and with the use of technology
- 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 Relationships
Reports to the Chief Corporate Compliance & Privacy Officer.

Minimum Qualifications
- Master’s Degree in Healthcare, Business, Education, or related field
- Three (3) years of conducting complex healthcare analysis and investigations
- Leadership competencies to include planning and organizing, problem solving, informing, consulting, supporting, and networking
- Knowledge of coding/utilization, billing, medical records, review/analysis, and documentation

Preferred Qualifications
- Juris Doctor (J.D.)
- Professional Registration/Certification as a RN or other clinical healthcare credentials, current & active, including but not limited to RHIA, CPA, CFE, or CHC. (Must obtain CHC credentials within 6-months of hire)
- Five (5+) years recent managerial/supervisory experience in a hospital or a large multispecialty clinic setting with experience in the areas of compliance, audit, risk, quality and/or legal

Knowledge, Skills, Abilities and Other Characteristics
- Project Management experience and exceptional organizational skills
- Extensive Report Development experience & Policy & Procedure development experience
- Knowledge of Health Care Regulatory standards
- Excellent Analytical, Written, & Oral Communications skills
- 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 knowledge of Microsoft Office Suite
- 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.

Approval: ___________________________ ___________________________
Cathy Bodnar
Chief Corporate Compliance & Privacy Officer

Approval: ___________________________ ___________________________
Barbara Pryor
Deputy Chief of Human Resources