

Title: SVP, Compliance & Privacy Officer**Effective Date:** 3/6/2019**Job Code:** 02342

JOB SUMMARY:

Provide strategic leadership and oversight of all compliance programs for Broward Health in accordance with laws, regulations and governmental obligations to ensure the ongoing effectiveness of all compliance, ethics and privacy programs and processes. Ensure compliance with Medicare and Medicaid billing regulations, fraud and abuse laws, policies and procedures for the protection of privacy and confidentiality of protected health information (HIPAA), and other regulatory requirements. Collaborate with system wide and regional leadership, management and medical staff to promote an awareness, understanding and culture of positive, ethical and moral principles, and detection and resolution of compliance, ethics, and privacy matters that does not conform to federal and state laws. Support adherence to Broward Health's compliance and ethics program, policies, procedures and Code of Conduct.

SUPERVISION:

- A. Reports to:** Has direct access to the Board as needed including requesting executive sessions of the Compliance & Ethics Committee. Provides briefings to individual Commissioners on compliance program status and matters as needed. Administratively reports to the CEO.
- B. Supervises:** System-wide compliance function(s).

JOB QUALIFICATIONS:

- A. Education (or equivalent years of experience):**
Master Degree required.
- B. Experience (or equivalent education):**
10 years of related experience.
- C. Licensure:**
N/A
- D. Certification/Registration:**
Certified in Healthcare Compliance, Certified Internal Auditor, Certified in Compliance and Ethics Professional, Certified in Healthcare Privacy Compliance or Certified Fraud Examiner.
- E. Special Training:**
N/A

WORKING CONDITIONS:

- A. Physical demands required on a regular basis to perform the essential functions of this job:**
 - 1. Level:** Sedentary
 - 2. Weight Lifted (Frequency of Lift):** 10 lbs Infrequently OR Frequently 10 lbs and less
 - 3. Walking/Carrying:** 1.5 MPH No Grade OR Slower speed with 10 lbs or less
 - 4. Typical Energy Required:** 1.5 METS
- B. Environmental demands under which this job is performed on a regular basis:**
 - 1. Level:** Minimal
 - 2. Environment:** Typically good working conditions – may have random exposure to dirt, noise, hot/cold and/or crowded conditions.

RESPONSIBILITIES:

1. EXCEPTIONAL SERVICE:

Proactively build internal and external customer relationships and loyalty; meet or exceed customer needs and provide satisfaction within available resources; consistently demonstrates role model exemplary behavior.

2. COLLABORATIVE TEAM:

Initiate, participate and maintain an environment to support productive partnerships, relationships, team spirit, pride and joint efforts within work groups and across departmental and organizational lines; facilitate others to achieve overall organizational high performance, quality outcomes, goals and objectives.

3. ACCOUNTABILITY FOR POSITIVE OUTCOMES:

Assume personal responsibility and accountability for meeting and exceeding goals and standards. Explore opportunities for continuous development; assume responsibilities for errors, learn from them and implement solid action plan.

4. FOSTERING INNOVATION:

Anticipate need for organization and operational change; seek, recommend and implement creative improvements in products and services; apply and engage in out-of-the-box thinking; challenge current practices and status quo; focus on doing the right things as well as doing things right to accomplish strategic objectives.

5. VALUING EMPLOYEE AND COMMUNITY FAMILY:

Create and maintain an atmosphere of accepting all others; treat co-workers, customers and business partners with dignity and respect; continually strive to include all others to produce higher quality products and services; build positive, productive work relationships.

6. STRATEGY & PLANNING:

Provide proactive strategic leadership through the development of a comprehensive and integrated compliance and privacy strategic plan to support Broward Health strategic objectives, initiatives, mission, vision, and goals. Provide for on-going oversight to evaluate and strategically respond to developments/changes affecting compliance and privacy strategies and operations in order to sustain and/or adjust plans or initiatives.

- a. Develop, administer and implement an effective system wide compliance and privacy program including promoting the use of the Compliance and Privacy hotline, heightened awareness of applicable policies and procedures, Code of Conduct and related policies, programs, systems and strategies.
- b. Develop the strategy for and implement an effective Business Integrity program including evaluation of industry standards and the adoption and implementation of best practices in the area of health care compliance and privacy.
- c. Promote integration with all compliance and privacy processes across the system to ensure system wide strategic direction and operational goals are met.
- d. Lead in the research, development and system wide implementation of compliance and privacy "Best Practices."

7. OPERATIONS MANAGEMENT:

Provide leadership and oversight to ensure effective and efficient execution of operational plans that are aligned with system-wide compliance and privacy goals, applicable laws, regulations, and governmental requirements. Improve the organization's capability through a planned process to align various aspects of the organization to meet its goals.

- a. Develop, implement, and ensure adequate execution of a robust integrated infrastructure to support the achievement of system wide and regional compliance and privacy goals and objectives consistent with Broward Health policies procedures, and objectives.
- b. Responsible for the maintenance of the Broward Health Code of Conduct; development, implementation and maintenance of policies and procedures for the general operation of the compliance

program; and health information privacy practices in order to maintain an effective compliance, privacy and business integrity program. Monitors and evaluates effectiveness of the Compliance Program and makes changes or updates to the program as needed.

- c. Assumes responsibility to establish compliance and privacy program work plans, values and performance expectations; conduct related risk assessment activities which include the analysis and interpretation of the Office of Inspector General Work plan, Office for Civil Rights guidance and rulings etc. and address remediation plans as necessary to further promote compliance and privacy improvement within the organization.
- d. Develop, oversee and maintain compliance and privacy monitoring programs, policies and procedures for compliance occurrence detection and response of system wide high risk areas. Develop system wide benchmarks and assure the timely and effective communication of review findings to executive team.
- e. Implement initiatives to foster an ethical culture throughout the hospital system. Ensure the compliance program effectively prevents and addresses violations of the law.
- f. Develop, implement and oversee requirements of the Corporate Integrity Agreement.
- g. Designs, develops, implements and operates the Compliance Program.
- h. Establishes and chairs an executive-level corporate compliance committee, i.e. Executive Compliance Group (ECG).
- i. Establishes, facilitates, and manages channels for reporting problems and concerns without fear of retaliation (e.g. hotline).
- j. Develops, coordinates, implements and evaluates compliance training/education for all employees and affiliated health care professionals.
- k. Conducts and/or oversees appropriate compliance investigations and inquiries. Has access to all personnel and records necessary to conduct and complete investigations.
- l. Works with the Chief Administrative Officer, Chief Financial Officer and Executive Compliance Group to establish audit controls and measurements and to ensure proper controls are in place and effective.
- m. Maintains working knowledge of compliance issues, laws and regulations.
- n. Ensures appropriate screening is conducted to ensure that we do not hire or conduct business with individuals or entities that have been excluded or barred from participation in federal programs.
- o. Works with the ECG to identify compliance risks, develop a compliance audit work plan at least annually, and ensure appropriate compliance audits are conducted and corrective action is taken when indicated.
- p. Responds appropriately to violations and notifies the Board of Commissioners (Board) or external agency if deemed necessary.
- q. Reports regularly (at least quarterly) to the ECG and Board on the operation and effectiveness of the Compliance Program.

8. LEADERSHIP:

Establish and maintain positive, productive and collaborative relationships with internal and external partners to support an engaged and inclusive culture and system wide integration and advancement of the Broward Health mission, vision, strategic objectives and business goals.

- a. Demonstrate thorough understanding of compliance, privacy and ethical standards/regulatory requirements and serve as the organizations' internal expert and communicator on regulations impacting the system. Exhibit system thinking and global perspective in the provision of proactive, sound guidance regarding compliance and privacy matters in order to achieve system wide and regional goals.
- b. Work collaboratively with internal departments including but not limited to Legal, Risk Management, Finance, Human Resources, Quality, Internal Audit, and Information Systems for system wide integration of compliance and privacy programs as well as remediation and enforcement of the program.
- c. Provide leadership and oversight of compliance and privacy specific plans to ensure implementation of efficient operations and system wide compliance consistent with laws, regulations and government.
- d. Work with corporate and regional leadership in setting organizational values to further promote compliance and privacy improvement within the organization.
- e. Develop and implement an engaging and comprehensive training and education program that focuses on the elements of the compliance and privacy programs and seek to ensure that all employees, management and medical staff are knowledgeable of and comply with applicable federal and state standards.
- f. Strengthen key community relationships in such areas as local community services, education, business and professional organizations.

9. FINANCIAL MANAGEMENT:

Accountable for the key financial indicators of Broward Health; plan, develop, organize, implement, direct, and evaluate assigned areas' fiscal function and performance.

- a. Demonstrate financial acumen and fiscal responsibility and exhibit accountability for efficient and effective compliance and privacy operations.
- b. Responsible for the administration, development and oversight of financial outcomes for compliance areas.
- c. Assist organization to proactively identify and address compliance matters that may have financial impact to the organization.

10. HUMAN RESOURCES:

Oversee the effective utilization of Broward Health's employee partners/workforce in the areas of responsibility and support system-wide employee workforce planning, strategies and initiatives.

- a. Create and maintain an effective, collaborative, engaged, inclusive team with an emphasis on open, direct and honest communication which supports employee engagement, retention, system thinking, performance and market success.
- b. Promote and model an environment and culture of high performance and continuous improvement that values a commitment to quality through coaching and managerial oversight of staff performance and development.
- c. Provide and foster a positive and engaged employee environment through consistency and uniformity in application and interpretation of governing policies, practices and all terms and conditions of employment.
- d. Provide timely, constructive, communication and feedback consistent with Five Star Values, policies, and culture of diversity and inclusion.

All job requirements listed indicate the minimum level of knowledge, skills and/or ability deemed necessary to perform the job proficiently. This job description is not to be construed as an exhaustive statement of duties, responsibilities or requirements.