

## EXEMPT POSITION DESCRIPTION

<b>Position Title:</b> Corporate Compliance Officer	<b>Position Code:</b>
<b>Department:</b> Corporate Compliance	<b>Division:</b>
<b>Reports to (Position Title):</b> Chief Corporate Compliance Officer (organization's President/CEO)	<b>Effective Date:</b> 2001

**Quality Standard:** Under the general supervision of the Chief Corporate Compliance Officer:

1. Develop, maintain and support the implementation of the Corporate Compliance Program and Plan for organization
2. Facilitate the development of Compliance Programs with the Member Organizations of the organization's System.
3. Coordinate and perform Audits/Reviews to prospectively test compliance with established laws, regulations, company policies, and managerial guidelines.
4. Assist in the development of Corrective Action Plans when areas of opportunity are identified.
5. Investigate reports of alleged non-compliance, as deemed necessary, to final resolution.

**Essential Responsibilities:**

Planning Responsibilities:

1. Develop the Corporate Compliance Program and the Annual Corporate Compliance Plan, and assist in its development with Member Organizations.
2. Develop a System Risk Matrix, which identifies potential regulatory compliance obligations of \_\_\_\_ and its Member Organizations and prioritizes areas for assessment and audit/review.
3. Develop, on a yearly basis, a Corporate Compliance Audit/Review Schedule delineating the areas identified for Audit/Review based on the strategic objectives established in the Annual Corporate Compliance Plan & System Risk Matrix.
4. Develop \_\_\_\_ Corporate Compliance departmental Policies & Procedures, as deemed necessary, and in conjunction with the \_\_\_\_ Corporate Compliance Officer.
5. Develop a Corporate Compliance Department 90-Day Plan, at least quarterly, identifying activities planned for the period.
6. Develop \_\_\_\_ Corporate Compliance Council Monthly Agenda in conjunction with the \_\_\_\_ Chief Corporate Compliance Officer.

Organizing Responsibilities:

1. Develop detailed Compliance Audit/Review Schedules, to be updated on a quarterly basis, which are consistent with the annual System Risk Matrix and Plan.
2. Coordinate compliance audit/review activity with audit activity of the External Auditors and other groups/individuals, as determined by the \_\_\_\_\_ Chief Corporate Compliance Officer.

**% of Time**

10%

5%

**Essential Responsibilities (cont'd)**

Controlling Responsibilities:

1. Perform intra-departmental interviews with all key personnel involved with the process or function to verify compliance with established policies and procedures and applicable regulations in conjunction with the Corporate Compliance Analyst II and other personnel, as deemed necessary.
2. Prepare and analyze a narrative description of the process or function under audit/review in order to evaluate potential strengths and weaknesses and to determine the adequacy of the overall system to ensure compliance, as deemed necessary.
3. Develop Audit/Review Programs as delineated in the Compliance Audit/Review Schedule and perform prospective Audits/Reviews in conjunction with the Corporate Compliance Analyst II and other personnel as deemed necessary, except where specific professional licensing is required (i.e., MD), and as determined by the Chief Compliance Officer.
4. Develop Corporate Compliance/Audit Reports, upon completion of each compliance audit/review, which details recommendations designed to correct any potential weaknesses or areas of non-compliance discovered during the audit/review.
5. Assist Management of audit/review organizations/departments in developing Opportunity for Improvement Action Plans to correct potential weaknesses and assure ongoing compliance.
6. Perform Follow-Up audits/reviews as generated by the Corporate Compliance Department, External Auditors, Agencies, etc. to ensure Opportunity for Improvement Action Plans have been adequately implemented.
7. Assure that Corporate Compliance Audit/Review Reports are presented to the CEO of the reviewed organization, the organization's Board of Directors, & the Board of Directors, as directed by the Chief Corporate Compliance Officer.
8. Receive, Document, and Monitor reports of alleged non-compliance, via *Compliance Line*, or by other various means, to final resolution.
9. 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.
10. Develop compliance investigatory notes during the course of the investigation concerning reports of alleged non-compliance, as deemed necessary, while interfacing with the Chief Corporate Compliance Officer, and Legal Counsel if necessary.
11. Develop Compliance Investigatory Summary Reports during the course of the investigation and Investigatory Closure Reports subsequent to the completion of the investigation involving reports of alleged non-compliance, and under the auspices of the Chief Corporate Compliance Officer, and Legal Counsel if deemed necessary.
12. Assure that Compliance Investigatory Summary Reports are presented to the CEO of the organization to which the allegation pertains, its respective Board of Directors & the Board of Directors, as directed by the Chief Corporate Compliance Officer.

**% of Time**

50%

**Essential Responsibilities (cont'd)**

Supervisory Responsibilities:

25%

1. Supervise the Corporate Compliance Analyst II and other personnel to assist in the implementation of the Compliance Audit/Review Program, Annual Compliance Plan, System Risk Matrix, Compliance Audit/Review Schedule, & Compliance 90-Day Plan
2. Supervise the Corporate Compliance Analyst II, and other personnel conduct compliance intra-departmental interviews, narratives, and performing prospective Audits/Reviews, as delineated in the Compliance Audit/Review Schedule.
3. Supervise the Corporate Compliance Analyst II's, and other personnel's audit/review work papers to ensure its completeness and accuracy.
4. Oversee the Corporate Compliance Analyst II to assist in receiving, documenting and monitoring reports of alleged non-compliance (via *the reporting telephone line* and other various means) and tracking of other compliance monitoring areas (i.e., compliance education and training), as deemed necessary, to ensure on-going compliance.
5. Oversee the Corporate Compliance Analyst II in daily office functions, including various clerical activities.

Climate Setting and Leadership Responsibilities:

1. Create a working relationship with employees and management staff of all Member Organizations which allows for accomplishing the desired goals of the Corporate Compliance Program on a timely basis.
2. Represent the Corporation to external parties, as necessary during the course of employment, so as to enhance the image of the Corporation.

Operational/Technical Responsibilities:

1. Examine the effectiveness of established policies, standards, and procedures in assisting all levels of Management in their obligation to comply with all applicable regulatory standards.
2. Assist the Management of Member Organizations to develop educational plans, materials and resources to educate employees in the overall objectives of the Compliance Program and specific substantive areas of compliance for their organization.
3. Maintain a current understanding of regulatory trends and changes in law and to advise appropriate management staff of trends affecting their activity.
4. Abides by the Service Delivery Standards of the department

<b><u>Non-Essential Responsibilities:</u></b>	<b>% of Time</b>
1. Performs other related duties as required.	

**Minimum Qualifications:**

- Masters Degree in Business, Health Care Administration, Accounting/Finance
- Professional Certification as a CFE, CIA, CHC, or CPA, Current & Active
- 10 + Years experience in Auditing, Accounting, Financial Management
- 5 + Years of Project Management experience
- 3 + Years of conducting complex compliance Investigations, preferably in Health Care
- 5+ Years of Managerial/Supervisory experience
- Extensive Report Development experience & Policy & Procedure development experience
- Knowledge of GAAS & GAAP Standards & Principles, and Statistical Data Analysis
- Knowledge of Health Care Regulatory standards
- Excellent Analytical, Written, & Oral Communications skills
- Experience in Public Speaking and Business Presentations
- Excellent Spreadsheet, Internet, Power Point, & Word Processing skills

**Preferred Characteristics:**

- Professional work experience with/for Federal & State Agencies, preferably Health Care related
- Direct experience with Start-Up Departments, Infrastructures
- Flexible, Motivated by Challenges; Creative; Interpersonal Skills
- Professional Membership affiliation with the Association of Certified Fraud Examiners, Institute of Internal Auditors, Health Care Compliance Association, &/or Association of Healthcare Internal Auditors

**Environmental Conditions:**

- Work conducted in primarily an office environment and in various meeting locations throughout nine multiple Member Organization campuses and various facilities throughout three counties; requires travel between sites.
- Use of personal computer and keyboard as well as other office equipment (e.g., telephone, fax, copier, etc.).

**Personal Protective Equipment:** None

**Ages of Patients Served:** Not involved with direct patient care