



**MORROW COUNTY
HEALTH DISTRICT**
Excellence in Healthcare

Employment at Morrow County Health District

Morrow County Health District believes that each employee makes a significant contribution to those we serve and the District as a whole. Every day our patients, families, other healthcare providers, visitors and coworkers are always deserving of exceptional, friendly service and the highest level of quality care possible. This is made possible by all employees agreeing to adhere to the District's Promise of Excellence and upholding our True North Statement of "Welcoming our patients and providing exceptional care."

Your contribution to the District and those we care for is not limited by the responsibilities set forth in this position description. This description is designed to outline primary duties, qualifications and job scope, but not limit the employee nor the organization to just the work identified. It is our expectation that each employee will offer their services wherever and whenever necessary.

Title: Compliance Officer

Department: Administration

Exempt/Non-Exempt: Exempt

Reports to: MCHD Board / CEO

Effective Date: 11/27/18

General Position Summary:

The Compliance Officer oversees maintenance, updates and implementation of MCHD's compliance and ethics program. The program is designed to prevent and detect violations of law and other misconduct, and to promote ethical conduct and a commitment to compliance with the law. The manager will also extract data and compile various reports within the District for both internal and external compliance needs and requirements.

Essential Functions:

1. Maintain, update and implement the ethics and compliance program in collaboration with the compliance committee and executive management.
2. Ensure that appropriate standards, practices and internal controls, including a code of conduct, are adopted, published and explained to employees and agents.
3. Report to the compliance committee and the board of directors periodically, and to the MCHD chief executive officer on a regular basis on the efforts to effectively implement the program.
4. Oversee periodic compliance risk assessment.
5. Prepare work plan addressing the priority compliance risk exposures for review by the compliance committee and inclusion in an updated ethics and compliance program.

6. Oversee monitoring and auditing processes to ensure accurate documentation of and billing for services provided to MCHD patients.
7. Ensure that there is an effective system in place for employees and other agents to raise questions and obtain advice regarding compliance and integrity, and to report misconduct without fear of retaliation, and with appropriate follow-up.
8. Act as a resource to the Human Resources department, which ensures the following:
 - o MCHD does not hire or continue to employ individuals who have been excluded from federal health care programs.
 - o MCHD has implemented an appropriate disciplinary policy that it is consistently, objectively and fairly applied to personnel at all levels of the organization for compliance related infractions, including and up to termination of employment.
 - o A system and procedures are in place to prevent delegation of substantial discretionary authority to anyone who has engaged in illegal activities or other conduct inconsistent with the compliance and integrity program.
9. Conduct or coordinate investigations into compliance related issues or reports to ensure that there is adequate follow-up, corrective action is taken, and that appropriate documentation is developed and retained.
10. Develop a records management system for the ethics and compliance program that ensures that all relevant documents being maintained or developed by MCHD, in either paper or electronic format, are secure, accurate, complete and evaluated on a regular basis for destruction or retention.
11. Ensure that an effective system exists for communicating the program's standards and guidance in the compliance risk areas, including:
 - An organization-wide training on the program and the code of conduct for employees, officers, members of the board, and, as appropriate, agents of the District on an annual basis.
 - Incorporation of an ethics and compliance curriculum into the orientation program for all new employees within 90 days of hire.
 - An on-going training for employees working in high risk positions or departments within MCHD to build and/or maintain the skill level of these employees in their areas of responsibility.
12. Review records and contracts requiring compliance with state and federal regulations.
13. Monitor and update the Ethics and Compliance Program.
14. Perform a periodic review of the program to evaluate its effectiveness in promoting ethical and compliant conduct.
15. Act as an advocate and champion of the ethics and compliance program amongst MCHD workforce members.
16. Keep current with ethics and compliance best practices and represent MCHD in external compliance and ethics forums.
17. Follow all HIPAA rules and regulations.
18. Participate in various District meetings, trainings.
19. Participate in monthly Department Managers' Meeting.
20. Ensure that required compliance regulations are in place and followed across the District in preparation for surveys, inspections.

Essential Functions Privacy Officer – 50%:

1. Develop, implement and maintain privacy policies and procedures that comply with the HIPAA Privacy Rule.
2. Work with all personnel involved with any aspect of the disclosure of protected health information to ensure full compliance with MCHD privacy policies.

3. Maintain current knowledge of federal and state privacy laws and regulations and monitors advancements in information privacy technologies to ensure organizational adaptation and compliance.
4. Receive, respond to and document complaints from patients, employees, and other entities regarding MCHD's privacy practices.
5. Conduct privacy risk assessments and audits of privacy compliance.
6. Maintain/achieve certification in compliance and HIPAA security areas.
7. Help identify new service lines and implement if approved.
8. Perform data analytics District-wide to help identify needs of service lines, meet standards and goals of payors and to raise HCAHP scores
9. Coordinate and oversee compliance of Meaningful use requirements for attestation.

Secondary Functions Privacy Officer:

1. Oversee direct, deliver or ensure the delivery of privacy and information privacy training and orientation to all members of the workforce.
2. Participate in the development, implementation and ongoing compliance monitoring of all Business Associate Agreements to ensure that all privacy concerns, requirements and responsibilities have been met.
3. Initiate, facilitate and promote activities to foster information privacy and security awareness.
4. Ensure alignment between privacy and security policies and practices.
5. Conduct regular inspections of agency facilities and procedures related to privacy practices and provide standard training to ensure compliance with HIPSS privacy standards and all other federal and state privacy statutes and regulations.
6. Assist MCHD in grant writing projects.
7. Work with MCHD consultant to gather data and compile reports for Community Health Needs Assessment.
8. Other duties as assigned.

Job Scope:

Supervisory Responsibility:

This position works with other MCHD staff, but has no direct supervisory responsibility.

Interpersonal Contacts:

Excellent professional interpersonal communication skills are required for in-person, phone and email communications. The Manager is in constant communication with all staff and outside contractors and vendors, affiliated agencies, grant sponsors and others. Must be able to interact with others in a thoughtful and professional manner.

Specific Job Ability:

The Compliance Officer must possess excellent communication skills, both written and verbal and have the ability to work effectively and independently with all levels of staff within the District, as well as others from outside entities. The manager must possess excellent computer skills

and be able to extract and analyze various types of data for internal and external reporting requirements.

Specific Job Effort:

Mental efforts include critical thinking and problem solving skills for regular monitoring and analysis of federal and state requirements, staying abreast of laws and regulations that would affect MCHD policies and procedures, reporting to the MCHD leadership team. Work is generally independent and collaborative in nature.

Physical efforts include adequate vision, hearing and manual dexterity to perform duties, be able to safely lift up to 25 lbs., excessive sitting, walking, bending, stooping, standing.

Education, Experience and Certification/Licensure:

Bachelor degree required with professional compliance and ethics certification preferred. Five years of experience preferred. Combination of education and work experience will be considered.

Job Conditions

The position is subject to exposure to infectious diseases, substances, odors, and occasionally, hostile and emotionally upset patients & family members. The position will require some travel between District locations as well as occasional overnight stays for trainings, etc.

I have read the above position description. I will perform the position to the best of my ability. A copy of this position description will be placed in my personnel file.

Signature of Employee

Date