

HCCA Compliance 101, Fifth Edition

Appendix 1. Sample Compliance Officer Job Description

[Note: This document is intended to describe the general content of and requirements for the performance of this job. It is not to be construed as an exhaustive statement of duties, responsibilities, or requirements.]

Position title: Chief Compliance Officer

Reports to: [TITLE]

Supervises: Executive Compliance Directors and Regional/LOB Compliance Directors and Professionals

Essential Position Purpose

The Chief Compliance Officer position leads Compliance services provided to [ENTITY] and oversees other appropriate compliance professionals with varying backgrounds. Oversight will include working with the compliance personnel to:

- a. Develop risk-based compliance plans that have been vetted with key regional and local stakeholders;
- b. Identify and clarify accountabilities of the management team to implement the compliance plans;
- c. Ensure that the plans reflect the current priorities of the organization; and
- d. Review, at least quarterly, these plans with regional senior management and with chain-of-command input.

Additionally, this position will:

- Participate in developing key committee materials for presentation to the senior leadership meetings, as directed by the chain of command, and also to the [ENTITY] Board's Compliance Committee;
- Provide compliance throughout the system, lines of business, and other organizations (including global and other affiliated entities);
- Give advisory assistance on key risk areas;
- Conduct investigations when and where applicable;
- Perform monitoring of risk mitigation activities; and
- Develop and ensure consistency of compliance infrastructure (integrity) and system-wide compliance-risk support including privacy, research, ambulatory, reimbursement/revenue cycle, physician, and acute hospital.

This position, along with other compliance personnel, will also participate and represent the [ENTITY] on key committees and task forces and lead system-wide initiatives as determined by the SVP/CRO, on behalf of the [ENTITY].

Responsibilities are diverse and support the [ENTITY's] full continuum of services provided, as well as the various operations and businesses operated by the [ENTITY]. This position is exposed to and handles highly sensitive information, oversees investigations, where applicable, ensures, with peers, that services are performing to the needs of the organization, collaborates with key stakeholders, directs compliance services from a strategic focus on value-add delivery, understands the key risk priorities of the organization, and ensures the associated work plans are nimble, flexible, effective, and efficient in implementation. This position also performs good stewardship of the resources available, and, with peers, assists in identifying where resources need to be reallocated to meet the needs of the organization. This position will be visible to the communities [ENTITY] serves.

The Chief Compliance Officer must act in an ethical manner, with behaviors that promote team concepts and reflect [ENTITY's] mission, core values, and philosophy.

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