

PRIVACY	Director, Privacy Program & Compliance Education	Manager, Privacy Program	Privacy Specialist (Lead)	Privacy Specialist (Senior)	Privacy Specialist (Intermediate)	Privacy Specialist (Associate) CURRENTLY NOT APPLICABLE TO PRIVACY PROGRAM
[HR Title]	[Compliance Director]	[Compliance Manager]	[Compliance Specialist, Lead]	[Compliance Specialist, Senior]	[Compliance Specialist, Intermediate]	[Compliance Specialist, Associate]
HR Level	10	13	12	10	9	7
QUALIFICATIONS	<ul style="list-style-type: none"> Certified Healthcare Compliance (CHC) and/or CHC-Privacy (or take CHC-P exam and achieve certification no later than 24 months from hire date.) Additional certification is encouraged but not required 	<ul style="list-style-type: none"> Certified Healthcare Compliance (CHC) and/or CHC-Privacy (or take CHC-P exam and achieve certification no later than 24 months from hire date.) Additional certification is encouraged but not required 	<ul style="list-style-type: none"> Certified Healthcare Compliance (CHC) and/or CHC-Privacy (or take CHC-P exam and achieve certification no later than 24 months from hire date.) Additional certification is encouraged but not required 	<ul style="list-style-type: none"> Certified Healthcare Compliance (CHC) and/or CHC-Privacy (or take CHC-P exam and achieve certification no later than 24 months from hire date.) Additional certification is encouraged but not required 	<ul style="list-style-type: none"> Certified Healthcare Compliance (CHC) and/or CHC-Privacy (or take CHC-P exam and achieve certification no later than 24 months from hire date.) Additional certification is encouraged but not required 	Not Applicable (Qualifications less than a Privacy Specialist, Intermediate currently do not apply to Privacy Program)
QUALIFICATIONS - Experience	<ul style="list-style-type: none"> 10+years HIPAA Privacy and/or HIPAA, <i>or equivalent combination of education, experience, and/or demonstrated performance with high level work quality & productivity</i> 	<ul style="list-style-type: none"> 9+years HIPAA Privacy and/or HIPAA, <i>or equivalent combination of education, experience, and/or demonstrated performance with high level work quality & productivity</i> 	<ul style="list-style-type: none"> 7+years HIPAA Privacy and/or HIPAA security, <i>or equivalent combination of education, experience and/or demonstrated performance with high level work quality & productivity</i> 	<ul style="list-style-type: none"> 4-7+ years HIPAA Privacy and/or HIPAA security, <i>or equivalent combination of education, experience, and/or demonstrated performance with high level work quality & productivity</i> 	<ul style="list-style-type: none"> 1-4 years HIPAA Privacy and/or HIPAA security, <i>or equivalent combination of education, experience, and/or demonstrated performance with high level work quality & productivity</i> 	Not Applicable
Duties	<ul style="list-style-type: none"> Lead the planning and development of system-wide awareness/ education program re HIPAA Privacy (and Compliance Program overall) Coordinate and streamline health system compliance education 	<ul style="list-style-type: none"> Assist with planning and development of system-wide awareness/ education re HIPAA Privacy (and Compliance Programs, as applicable) Assists Director in assuring accuracy, consistency and 	<ul style="list-style-type: none"> Assists Privacy Manager, Director <i>and other Privacy Specialists</i> in Privacy Program and other Compliance Activities, which could include reviewing internal processes, documents and reports, and 	<ul style="list-style-type: none"> Assists Privacy Manager, Director <i>and other Privacy Specialists</i> in Privacy Program and other Compliance Activities, which could include reviewing internal processes, documents and reports, and ensuring compliance with internal 	<ul style="list-style-type: none"> Assist Privacy Manager and Director in all Privacy Program and other Compliance activities, which could include reviewing internal processes, documents and reports, etc. and ensuring compliance with 	Not Applicable

	<p>efforts across multiple units/departments to ensure thoroughness, consistency and accuracy of content.</p>	<p>appropriate documentation and tracking</p>	<p>ensuring compliance with internal and external regulatory framework.</p> <ul style="list-style-type: none"> Analyze, compare and evaluate various courses of action and able to make independent decisions on matters of significance, free from immediate direction, within scope of responsibilities. Primary activities and decision-making authority are predominantly performed independently affecting business operations to a substantial degree. Serves as an expert in HIPAA Privacy Program and able to advise others on HIPAA regulations and operational application to specific scenarios. Interprets internal or external business issues and recommends solutions and/or best practices. Resolves complex issues using a broad perspective to identify solutions and works independently with little guidance. 	<p>and external regulatory framework.</p> <ul style="list-style-type: none"> Analyze, compare and evaluate various courses of action and able to make independent decisions on matters of significance, free from immediate direction, within scope of responsibilities. Primary activities and decision-making authority are predominantly performed independently affecting business operations to a substantial degree. Conducts investigations involving greater complexity, analysis and advisory activities. 	<p>internal and external regulatory framework.</p> <ul style="list-style-type: none"> Analyze, compare and evaluate various courses of action and able to make independent decisions on matters of significance, free from immediate direction, within scope of responsibilities. Primary activities and decision-making authority are predominantly performed independently affecting business operations to a substantial degree. 	
Duties	<ul style="list-style-type: none"> Oversight of all Privacy Program investigations, breach risk assessments, 	<ul style="list-style-type: none"> Conduct thorough privacy investigations involving greater 	<ul style="list-style-type: none"> Conduct thorough privacy investigations involving greater 	<ul style="list-style-type: none"> Conduct thorough privacy investigations involving greater complexity and 	<ul style="list-style-type: none"> Conduct thorough privacy investigations with peer and/or 	Not Applicable

	<p>tracking, etc. to assure accuracy, consistency among cases, and appropriate documentation and tracking</p> <ul style="list-style-type: none"> Creates and provides dashboard reporting on Privacy Program activities, including privacy allegations, violations, and breaches 	<p>complexity and with continued increased independence, and able to independently provide oversight/ assistance for peers in doing the same</p> <ul style="list-style-type: none"> Provides assistance, advice and guidance to team members in handling complex cases 	<p>complexity and with continued increased independence, and assists/advises peers in doing the same</p> <ul style="list-style-type: none"> Independently handles higher level of complexity than junior staff, assists junior staff with complex cases 	<p>with increased level of independence</p> <ul style="list-style-type: none"> Seeks and receives assistance/advice from team members, dependent upon complexity of cases Independently handles higher level of complexity than Privacy Specialist, Intermediate staff Assists Privacy Specialist, Intermediate staff with complex cases 	<p>supervisory direction/oversight, seeks and receives assistance/advice from team members, dependent upon complexity of cases.</p>	
Duties	<ul style="list-style-type: none"> Develop Privacy Program and Compliance Program education efforts for Hybrid Covered Entity Covered Components and, as applicable, in collaboration Identify and report on metrics re Privacy Program; identify metrics to evaluate the effectiveness of the health system compliance effort in regard to policy and education. Primary HIPAA Privacy advisor to the Chief Compliance Officer Represent CCO/Compliance Program for all audiences, including all leadership levels Hire, manage all Privacy Program Staff Lead planning and development of system- 	<ul style="list-style-type: none"> Assist planning and development of system-wide incident reporting system Assist the planning and development of system-wide privacy education & IT Security Audit Team in the security awareness program Recommend for hire, manage Privacy Specialists and/or specific Privacy Program Projects/Components Lead planning, development and implementation of Privacy Risk Assessment Program Primary Liaison to health system and institutional units Participate and/or lead campus privacy and security liaison quarterly meetings and serve as primary contact to liaisons for Privacy 	<ul style="list-style-type: none"> Attend Privacy Program committees, as assigned, to facilitate education of HIPAA Privacy risks/solutions and communication within the organization Mentor guide junior staff Participate on or lead Privacy Program and Compliance Program projects Privacy Program Policy Development, Review and Revision Project Management Maintain through regular review and revision of HIPAA Training modules and related content Staff, assist and/or lead campus unit privacy and security liaison quarterly meeting agenda items, assist Manager and Director with campus unit liaison issues, as assigned 	<ul style="list-style-type: none"> Reviews the investigation and breach risk assessment work of peers and junior staff Mentors and guides Intermediate Privacy Specialist Assists manager/director in supervising and performing final review of Intermediate and Associate auditor work Actively participates in Privacy Program committees to facilitate communication, interaction, relationship-building, etc. Participates in policy review and development Takes ownership of customer requests as received or assigned Proposes and implements improvements to risk assessment tools and audit software 	<ul style="list-style-type: none"> Attends Privacy Program committees to facilitate communication, interaction, relationship-building, etc. Participates in policy review and development Responds to customer requests as received or assigned Assists with incident management Assists with Privacy Program messages and education materials Reports to Privacy Manager or Director, Privacy Program, as applicable 	Not Applicable

	<p>wide HIPAA Privacy compliance plan</p> <ul style="list-style-type: none"> • Senior-level Liaison to system and institutional units; Lead Privacy Program education efforts for Hybrid Covered Entity Covered Components in collaboration with • Recommends and represents HIPAA Privacy Program for health system Compliance • Manage program related finances • Demonstrable leadership skills as depicted by HR Leadership Competency Plan • Demonstrable management and supervisor skills including staff development, performance eval and management, team building, and effective communication skills • Demonstrable skills/ability to develop educational materials with knowledge of adult learning styles, various learning. 	<p>Program-related activities.</p> <ul style="list-style-type: none"> • Participate on or lead Privacy Program and Compliance Program projects • Demonstrable management and supervisor skills including staff development, performance evaluation and management, team building, and modeling effective communication skills • Demonstrable project and time management skills • Effective communication skills • Reports to Director Privacy Program and Compliance Education 	<ul style="list-style-type: none"> • Demonstrable project and time management skills • Effective communication skills • Reports to Privacy Manager or Director, Privacy Program, as applicable 	<ul style="list-style-type: none"> • Assists manager/director in compiling reports for leadership of aggregate risk assessment findings • May develop privacy and/or security awareness messages and education materials in collaboration with the Director of Compliance Policy & Education • Reports to Director Privacy Program and Compliance Education <p>Performance Expectations</p> <ul style="list-style-type: none"> • Mastery of Breach Risk Assessment and Breach Incident Management process • Consistent quality work product • Established track record of good customer relationships • Demonstrated interest in and ability to solve problems – for both customers and team 		
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<p>COMPLIANCE Specialist Level</p>	<p>Compliance Specialist Associate</p>	<p>Compliance Specialist, Intermediate</p>	<p>Compliance Specialist, Senior</p>	<p>Compliance Specialist, Lead</p>
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Minimum Education	Bachelor's degree or equivalent combination of education and work experience	Bachelor's degree or equivalent combination of education and work experience	Bachelor's degree or equivalent combination of education and work experience	Bachelor's degree and higher degree in healthcare, nursing, law, or other related field or an equivalent combination of education and work experience.
Minimum Work Experience	At least 1-year relevant work experience in healthcare, compliance or an equivalent combination of education, experience, and/or demonstrated performance with high level work quality & productivity	At least 3 years relevant work experience in healthcare, compliance or an equivalent combination of education, experience, and/or demonstrated performance with high level work quality & productivity	At least 5 years' relevant work experience in healthcare, compliance or an equivalent combination of education, experience, and/or demonstrated performance with high level work quality & productivity Experience with health laws and regulations, accreditation standards, or senior level healthcare operations experience.	At least 7 years' relevant work experience in healthcare, compliance or an equivalent combination of education, experience, and/or demonstrated performance with high level work quality & productivity Experience with health laws and regulations, accreditation standards, or senior level healthcare operations experience.
Oversight/Level of Supervision Needed	Develops competence by performing structured work assignments. Receives instruction, guidance and direction from others. Works under direct supervision from a program director.	Develops competence by performing structured work assignments. Receives instruction, guidance and direction from others. Works under a moderate supervision. Performs a range of mainly straightforward assignments. Uses prescribed guidelines or policies to analyze and resolve problems.	Comfortable taking ambiguous work assignments and creating a clear and concise work product. Receives a minimal level of guidance and direction. Able to independently manage multiple on-going complex projects.	Comfortable taking ambiguous work assignments and creating a clear and concise statement of work. This is the most senior skill level without supervisory responsibility Able to independently manage multiple on-going highly complex projects.
Provision of Guidance/Assistance to Others			Lead investigations or project steps within a broader project or may have accountability for ongoing activities or objectives	Lead investigations or project steps within a broader project or may have accountability for ongoing activities or objectives; Provides assistance, advice and guidance to team members in handling complex cases;

				Acts as Team Lead to coordinate the activities of other Specialists.
Knowledge & Understanding		<p>Ability to research and understand compliance obligations, including state and federal statutes and regulations.</p> <p>Continues to build knowledge of the organization, processes and customers.</p> <p>Has conceptual knowledge of theories, practices and procedures within healthcare or regulatory/compliance discipline.</p>	<p>Ability to research and understand compliance obligations of moderate complexity, including state and federal statutes and regulations.</p> <p>Develops a comprehensive and advanced working understanding of healthcare compliance to become an authoritative resource within the organization.</p> <p>Identify compliance risk areas and assists with the development and implementation of policies and corrective action plans where indicated.</p> <p>Has conceptual knowledge of theories, practices and procedures within healthcare or regulatory/compliance discipline.</p>	<p>Ability to research and understand compliance obligations of substantial complexity, including state and federal statutes and regulations.</p> <p>Develops a comprehensive and advanced working understanding of healthcare compliance to become an authoritative resource within the organization.</p> <p>Identify compliance risk areas and assists with the development and implementation of policies and corrective action plans where indicated.</p> <p>Has conceptual knowledge of theories, practices and procedures within healthcare or regulatory/compliance discipline.</p>
Problem Solving Abilities			<p>Ability to solve problems independently and in a timely way.</p> <p>Recommends process improvements.</p>	<p>Ability to solve problems independently and in a timely way.</p> <p>Recommends process improvements.</p>
Skill Set	<p>Strong interpersonal, verbal, and written communication skills;</p> <p>The ability to interact and communicate effectively with all levels of staff and customers, and present information in a clear, easy-to-understand manner.</p>	<p>Strong interpersonal, verbal, and written communication skills;</p> <p>The ability to interact and communicate effectively with all levels of staff and customers, and present information in a clear, easy-to-understand manner.</p>	<p>Strong interpersonal, verbal, and written communication skills;</p> <p>The ability to interact and communicate effectively with all levels of staff and customers, and present information in a clear, easy-to-understand manner.</p>	<p>Strong interpersonal, verbal, and written communication skills;</p> <p>The ability to interact and communicate effectively with all levels of staff and customers, and present information in a clear, easy-to-understand manner.</p>

Strong analytical skills that enable the Specialist to effectively identify and monitor issues.

Strong analytical skills that enable the Specialist to independently and effectively identify and monitor issues, with the ability to quickly analyze issues, make practical business-oriented recommendations.

Prepares draft reports and recommends corrective actions clearly and concisely.

Ability to speak to large audiences, with strong presentation skills.

Ensures that compliance risks are addressed and corrective actions are taken, as appropriate;

Mentors junior team members of the Program to develop their knowledge and skills to work independently.

Strong analytical skills that enable the Specialist to independently and effectively identify and monitor issues, with the ability to quickly analyze issues, make practical business-oriented recommendations.

Prepares draft reports and recommends corrective actions clearly and concisely.

Ability to speak to large audiences, with strong presentation skills.

Ensures that compliance risks are addressed and corrective actions are taken, as appropriate;

Mentors junior team members of the Program to develop their knowledge and skills to work independently.

<p>Qualifications</p> <p>Preferred</p>	<p><i>Preferred Qualifications unique to the particular Program position.</i> <i>Examples:</i> Familiarity with [institution] Medicine’s policies and procedures, business processes, governance practices.</p> <p>Certifications specific to position.</p>	<p><i>Preferred Qualifications unique to the particular Program position. Examples:</i> Familiarity with [institution] Medicine’s policies and procedures, business processes, governance practices.</p> <p>Certifications specific to position.</p>	<p><i>Preferred Qualifications unique to the particular Program position.</i> <i>Examples:</i> Familiarity with [institution] Medicine’s policies and procedures, business processes, governance practices.</p> <p>Certifications specific to position.</p>	<p><i>Preferred Qualifications unique to the particular Program position. Examples:</i> Familiarity with [institution] Medicine’s policies and procedures, business processes, governance practices..</p> <p>Certifications specific to position.</p>
<p>Job Duties</p>	<p>Assists with communicating the health system’s conduct, integrity and compliance messages.</p> <p>Performs structured work assignments.</p> <p>Participates in the development and enforcement of a compliance program for the organization. Performs routine assignments using existing procedures.</p> <p>Participates in investigations of compliance deviations or failures.</p>	<p>Assists with communicating the health system’s conduct, integrity and compliance messages.</p> <p>Performs structured moderately complex work assignments, adhering to statement of work and project time lines.</p> <p>Conducts investigations of moderately complex compliance deviations or failures, conducts analyses, and prepares corresponding tools and reports.</p> <p>Assists with the creation and provision of program-related training & education materials, as assigned.</p>	<p>Assists with communicating the health system’s conduct, integrity and compliance messages.</p> <p>Performs complex work assignments, adhering to statement of work and project time lines.</p> <p>Conducts investigations of complex compliance deviations or failures, conducts analyses, and prepares corresponding tools and reports.</p> <p>Creates and provides program-related training & education materials.</p> <p>Assists with the development of standards of performance and related metrics.</p>	<p>Assists with communicating health system’s conduct, integrity and compliance messages.</p> <p>Performs highly complex work adhering to statement of work and time lines.</p> <p>Conducts investigations of highly complex compliance deviations/failures, conducts analyses, and prepares corresponding tools and eports</p> <p>Develops training education programs.</p> <p>Oversees compliance activities support of large complex group and/or manages teams responsible for audits and regs.</p> <p>Oversees/ensures development of policies and procedures in response to new or existing laws, Company policies.</p> <p>Develops SOPs and related metrics.</p> <p>Develops, communicates, implements, evaluates and monitors strategies, policies and procedures to mitigate risk, ensure compliance with federal and state laws and contractual obligations.</p>