| PRIVACY                    | Chief Privacy Officer (Enterprise)  | Director, Privacy Program   | Manager, Pr   |
|----------------------------|---|---|---|
|                            |   |   |   |
| HR Title                   | Chief Privacy Officer – Assoc. Vice President/Vice<br>President   | Privacy Director  | Privacy Manager   |
| Minimum Qualifications     | <ul> <li>Certified Healthcare Privacy Compliance (CHPC),<br/>and/or Certified Information Privacy Professional<br/>(CIPP-US) (or take CHPC exam and achieve<br/>certification no later than 24 months from hire date)</li> <li>Additional certification is encouraged but not required</li> </ul>   | <ul> <li>Certified Healthcare Privacy Compliance (CHPC) and/or<br/>Certified Information Privacy Professional (CIPP-US) (or<br/>take CHPC exam and achieve certification no later than<br/>24 months from hire date)</li> <li>Additional certification is encouraged but not required</li> </ul>                  | <ul> <li>Certified Healthcare Privacy Comp<br/>exam and achieve certification no<br/>date)</li> <li>Additional certification is encourage<br/>required</li> </ul> |
| Minimum Education          | <ul> <li>Bachelor's Degree in health care management, accounting, finance, business administration, or related field</li> <li>Master's degree in relevant area such as healthcare, healthcare administration, or law preferred</li> </ul>   | <ul> <li>Bachelor's Degree in health care management,<br/>accounting, finance, business administration, nursing, or<br/>related field; Master's degree in Business, Law, etc. is<br/>preferred</li> </ul>   | <ul> <li>Bachelor's Degree in health care n<br/>business administration, nursing, o<br/>in Business, Law, etc. is preferred</li> </ul>                            |
| Minimum Work<br>Experience | <ul> <li>10+ years HIPAA Privacy or equivalent combination of<br/>education, experience, and/or demonstrated<br/>performance with high level work quality &amp;<br/>productivity</li> <li>Experience in managing privacy compliance,<br/>preferably at an academic medical center, or an<br/>equivalent combination of training and experience</li> <li>Comprehensive knowledge of (i) health information<br/>privacy laws, including HIPAA, HITECH, and OCR<br/>guidance; (ii) use of health information in clinical<br/>research; and (iii) medical records management,<br/>including access, release and tracking techniques (iv)<br/>relevant state privacy and breach notification laws.</li> <li>Ability to work independently and leverage networks to<br/>advance programmatic</li> <li>Ability to promote privacy compliance across a diverse<br/>workforce</li> <li>Excellent leadership, project management,<br/>organizational, and communication skills</li> </ul> | <ul> <li>7-10+ years HIPAA Privacy, or equivalent combination of education, experience</li> <li>Full knowledge of HIPAA Privacy, Security and Breach Notification Rules, and HHS Office for Civil Rights Compliance Guidance</li> <li>Knowledge of relevant state privacy and breach notification laws</li> </ul> | <ul> <li>3-5 years HIPAA Privacy, or equival experience</li> <li>Knowledge of, HIPAA Privacy, Secuand HHS Office for Civil Rights Con</li> </ul>                  |

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| later than 24 months from hire       |
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| or related field; Master's degree    |
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| Duties | <ul> <li>Chief Privacy Officer oversees and directs all<br/>activities related to the development,<br/>implementation and maintenance of the health</li> </ul>   | <ul> <li>Oversight of all Privacy Program investigations,<br/>breach risk assessments, monitor employee access to<br/>protected health information, maintain HIPAA Privacy log,</li> </ul>   | <ul> <li>Assist with planning and developme<br/>education re HIPAA Privacy (and Co<br/>applicable)</li> </ul>  |
|--------|--|--|--|
|        | <ul> <li>systems (or university's) privacy office in accordance with applicable federal, state and international laws</li> <li>Serves as the designated privacy official under HIPAA administrative requirements and is responsible for developing and implementing the covered entities privacy policies and procedures; services as the person or contact office for receiving complaints and providing individuals with information on the</li> </ul> | <ul> <li>perform security breach analysis and make required reports to federal agencies</li> <li>Creates and provides dashboard reporting on Privacy Program activities, including privacy allegations, violations, and breaches</li> <li>Develops Privacy Program education; provides Privacy training, reviews and updates Privacy training, and ensures employees are completing training</li> <li>Identify and report on metrics re Privacy Program; identify</li> </ul> | <ul> <li>Assists the Director in maintaining t<br/>that sufficient procedural guidance<br/>developed; relevant policies have by<br/>following these policies and are reco<br/>documentation of compliance is bei</li> <li>Provides Privacy training as required<br/>training, ensures employees are reco</li> <li>Assists Director in assuring accuracy</li> </ul> |
|        | <ul> <li>covered entities privacy practices</li> <li>Oversees all activities related to the development,<br/>implementation, maintenance, and enforcement of<br/>the health systems (or university's) policies and<br/>procedures covering the privacy of protected health<br/>information (PHI)</li> </ul>  | <ul> <li>metrics to evaluate the effectiveness of the health system<br/>Privacy Program efforts in regard to policy and education</li> <li>Primary HIPAA Privacy advisor to the Chief Privacy<br/>Officer</li> <li>Hire, manage all Privacy Program Staff</li> <li>Lead planning, development and implementation of</li> </ul>   | <ul> <li>appropriate documentation and tra</li> <li>Conduct thorough privacy investigation involving greater complexity and wire independence, and able to independence oversight/assistance for peers in do</li> <li>Provides assistance, advice and guid</li> </ul>  |
|        | <ul> <li>Oversees the development of system-wide policies, procedures and practices governing the privacy and security of health information through the sophisticated analysis of data, operations, and regulatory requirements</li> <li>Chief Privacy officer has overarching institutional</li> </ul>   | <ul> <li>Privacy Risk Assessment</li> <li>Develops system wide HIPAA Privacy compliance plan;<br/>supervises staff to organize, conduct privacy investigations<br/>and audits to ensure compliance with health system<br/>policies, and federal and state rules.</li> </ul>  | <ul> <li>handling complex cases</li> <li>Assist in the planning and developm<br/>reporting system</li> <li>Assist the planning and developmen<br/>education &amp; IT Security Audit Team<br/>program</li> </ul>  |
|        | responsibility for health information privacy, and<br>breach notification compliance and OCR<br>notification/responses and other mandated breach<br>reporting requirements   | <ul> <li>Recommends and represents HIPAA Privacy Program<br/>for institution's Compliance</li> <li>Demonstrable management and supervisor skills including<br/>staff development, performance evaluation and<br/>management, team building, and effective communication</li> </ul>   | <ul> <li>Recommend for hire, manage Private<br/>Program Projects/Components</li> <li>Assists in the planning, developmen<br/>Privacy Risk Assessment Program</li> </ul>  |
|        | <ul> <li>Chief Privacy officer has overarching institutional<br/>responsibility for health information privacy<br/>investigations, education and enforcement</li> </ul>  | <ul> <li>skills</li> <li>Demonstrable skills/ability to develop educational materials<br/>with knowledge of adult learning styles, various learning</li> </ul>   | <ul> <li>Primary Liaison to health system and</li> <li>Participate and/or lead privacy and</li> <li>Participate on or lead Privacy Progr</li> </ul>  |
|        | • Chief Privacy Officer ensures security policies and procedures meet HIPAA standards for protecting the confidentiality, integrity and availability of electronic PHI   | <ul> <li>Investigative skills, preferably gained through law<br/>enforcement training/experience gained by actual<br/>application/experience. Proven ability to deal with<br/>disruptive patients/individuals gained by actual application</li> </ul>  | <ul> <li>Demonstrable management and sup<br/>development, performance evaluati<br/>building, and modeling effective cor</li> </ul>   |
|        | <ul> <li>Promotes a culture of respect for patient privacy<br/>and HIPAA compliance in alignment with<br/>institution's teaching, research and patient care<br/>missions</li> <li>Collaborates with strategic partners to access the</li> </ul>  | and experience   | <ul> <li>Demonstrable project and time man</li> <li>Effective communication skills</li> <li>Reports to Director Privacy Program</li> </ul>   |
|        | <ul> <li>Collaborates with strategic partners to assess the<br/>security of health-related IT systems, to manage IT-<br/>related risk, to ensure regulatory compliance, to<br/>align security and privacy practices, and to adapt<br/>policies, approaches, and standards to evolving<br/>technological challenges</li> </ul>  |  |  |

pment of system- wide awareness/ d Compliance Programs, as

- ing the Privacy Program by ensuring nce and training has been ve been created, employees are receiving required training; s being maintained, etc. uired, reviews and updates Privacy e receiving this training, etc. aracy, consistency and d tracking stigations d with continued increased pendently provide n doing the same guidance to team members in lopment of system- wide incident ment of system- wide privacy eam in the security awareness
- Privacy staff and/or specific Privacy
- ment and implementation of
- n and institutional units and security liaison meetings Program and Compliance Program
- d supervisor skills including staff luation and management, team e communication skills management skills

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| COMPLIANCE                 | Chief Compliance Officer   | Compliance Executive<br>Director/AVP   | Compliance Director/Sr<br>Director   | Compliance Associate Director   | Compliance Program Manager   |
|----------------------------|--|--|--|---|--|
| HR Title                   | Vice President (or Higher such as Sr. VP)  | Executive Director/ Associate Vice<br>President  | Compliance Director; Senior Director   | Compliance Associate Director   | Compliance Program Manager   |
| Minimum Qualifications     | <ul> <li>Requires professional certification<br/>in a compliance related field of<br/>expertise, such as internal audit,<br/>fraud investigation, health care<br/>compliance, or information<br/>management, coding and billing (or<br/>achieve certification no later than<br/>24 months from hire date)<br/>Example:<br/>CHC, RHIA</li> <li>Note: Some JD's may be hired into the Chief<br/>Compliance Officer role and may not<br/>immeditely have a professional certification<br/>such as a CHC. Recommend allowing 24<br/>months to achieve certification in this<br/>scenario.</li> </ul> | achieve<br>Example:<br>RHIA<br>Certified Professional Coder (CPC,<br>CCS-P)),<br>Certified Hospital Coder (CCS- H)   | <ul> <li>Requires professional certification<br/>in a compliance related field of<br/>expertise, such as internal audit,<br/>fraud investigation, health care<br/>compliance, or information<br/>management, Coding and Billing.<br/>Example:</li> <li>RHIA<br/>Certified Professional Coder (CPC,<br/>CCS-P)),<br/>Certified Hospital Coder (CCS- H)<br/>Certified Medical Compliance<br/>Officer (CMPO),<br/>Certified Professional Medical<br/>Auditor (CPMA),<br/>HCCA Compliance (CHC)</li> </ul> | <ul> <li>Requires professional certification in<br/>a compliance related field of<br/>expertise, such as internal audit,<br/>fraud investigation, health care<br/>compliance, or information<br/>management, Coding and Billing (or<br/>achieve certification no later than 24<br/>months from hire date)<br/>Example:</li> <li>RHIA<br/>Certified Professional Coder (CPC,<br/>CCS-P)),<br/>Certified Hospital Coder (CCS- H)<br/>Certified Medical Compliance Officer<br/>(CMPO),<br/>Certified Professional Medical<br/>Auditor (CPMA),<br/>HCCA Compliance (CHC)</li> </ul> |  |
| Minimum Education          | <ul> <li>Masters in degree in Business<br/>Administration, Juris Doctor,<br/>Masters is Juris Prudence, Health<br/>Administration, or related field</li> </ul>   | <ul> <li>Master's degree in Business<br/>Administration, Juris Doctor,<br/>Masters is Juris Prudence, Health<br/>Administration, or related field</li> </ul>   | <ul> <li>Bachelor's Degree; Master's degree<br/>in Business Administration, Juris<br/>Doctor, Masters is Juris Prudence,<br/>Health Administration, or related<br/>field preferred</li> </ul>  | <ul> <li>Bachelor's Degree; Master's degree<br/>in Business Administration, Juris<br/>Doctor, Masters is Juris Prudence,<br/>Health Administration or related<br/>field preferred</li> </ul>  | <ul> <li>Bachelor's degree in appropriate<br/>discipline (or equivalent<br/>combination of education and<br/>experience)</li> </ul>  |
| Minimum Work<br>Experience | <ul> <li>Requires 10 -15 years of<br/>progressively responsible<br/>experience in health care, audit,<br/>coding, revenuey cycle, legal<br/>and/or regulatory compliance.<br/>Holds a deep understanding of a<br/>clinical business function (e.g.<br/>Legal, Communications/Marketing,<br/>Human Resources, Operations,<br/>etc.) Requires knowledge of<br/>industry issues, managing complex<br/>projects; knowledge of Federal,<br/>State and Local regulatory agency<br/>guidelines and laws.</li> </ul>   | <ul> <li>Ten (10) years of experience in<br/>health care, audit, coding, revenue<br/>cycle, legal, and/or regulatory<br/>compliance. Applicable work<br/>experience may be used as<br/>equivalent work experience</li> </ul> | <ul> <li>Seven (7) to ten (10) of experience<br/>in health care, audit, coding,<br/>revenue cycle, legal, and/or<br/>regulatory compliance. Applicable<br/>work experience may be used as<br/>equivalent work experience</li> </ul>  | <ul> <li>Five (5) to seven (7) experience in<br/>health care, audit, coding, revenue<br/>cycle, legal, and/or regulatory<br/>compliance. Applicable work<br/>experience may be used as<br/>equivalent work experience</li> </ul>  | <ul> <li>Five (5) years of experience in<br/>health care, audit, coding, revenue<br/>cycle, legal, and/or regulatory<br/>compliance. Applicable work<br/>experience may be used as<br/>equivalent work experience</li> <li>If an Associate's degree, nine (9)<br/>years of experience in business,<br/>health care, coding, revenue cycle,<br/>legal, regulatory compliance</li> </ul> |

| Provision of<br>Guidance/Assistance to<br>Others            | <ul> <li>Oversees the effectiveness,<br/>operation, administration and<br/>management of the Corporate<br/>Compliance program</li> <li>This leader provides effective<br/>leadership, advice, and counsel to<br/>Senior Leadership (e.g., CEO, the<br/>Board of Directors) on matters of<br/>corporate compliance and ethical<br/>business practices</li> <li>Note: The OIG recommends separating the<br/>compliance function from key management<br/>positions including General Counsel in order for<br/>compliance to operate independently and<br/>objectively. Federal Setencing Guidelines state<br/>that as part of an effective compliance<br/>program, the Chief Compliance Officer must<br/>periodically report to the Board on the status of<br/>the compliance program. If it is not<br/>organizationally feasible for the Chief<br/>Compliance Officer to report directly to the<br/>Board or a Committee of the Board, the Chief<br/>Compliance Officer should have sufficient<br/>independence and has access to the Board.</li> </ul> | May report to Chief Compliance<br>Officer; Board of Directors, Dean,<br>oversees the Compliance Program<br>and responsible for operations   | operational planning, risk<br>assessment, audits and<br>investigation  | <ul> <li>Lead investigations or project steps within a broader project or may have accountability for ongoing activities or objectives</li> <li>Ability to research and understand</li> </ul>   | <ul> <li>Collaborates with other team members (Director/AVP) to implement the compliance program</li> </ul>   |
|---|---|---|--|---|---|
| Duties/Qualifications/<br>Knowledge/Skills and<br>Abilities |   | <ul> <li>Provides strategic direction and oversight regarding all compliance matters</li> <li>Understands and applies principles, procedures, requirements, regulations, data analytics, and policies related to specialized subject matter expertise</li> <li>Demonstrated collaborative skills</li> <li>Outstanding written and oral communications</li> <li>Demonstrated practical application of CMS regulatory compliance in a health care system</li> <li>Experienced leading successful compliance programs</li> <li>Broad understanding of modern information technology systems</li> </ul> | <ul> <li>Understands and applies principles, procedures, requirements, regulations, and policies related to specialized expertise</li> <li>In depth knowledge and experience of relevant laws and regulations (e.g., coding, billing, Medicare and Medicaid reimbursement, fraud and abuse laws, Medicare Conditions of Participation, the Stark and Anti-kickback statutes, HIPAA, FDA, DPH, and HHS-OCR) and enforcement</li> <li>Requires knowledge of state and federal regulatory agency laws and regulations (including HIPAA, Medicare, Medicaid, Anti-Kickback, Fraud and Abuse laws, False Claims Act, etc.)</li> <li>Requires prior experience within a compliance department or extensive clinical, operational, or other healthcare experience in areas related to billing, privacy, or regulatory compliance</li> </ul> | <ul> <li>possesses the ability to research and<br/>investigate complex issues</li> <li>Knowledge of compliance<br/>regulations and how these<br/>regulations impact billing<br/>compliance</li> <li>Identify compliance risk areas and<br/>assists with the development and<br/>implementation of policies and<br/>corrective action plans where<br/>indicated</li> <li>Has conceptual knowledge of<br/>theories, practices and procedures<br/>within healthcare or<br/>regulatory/compliance discipline</li> </ul> | <ul> <li>Assists in the development of compliance program initiatives; independently plans, manages compliance program activities</li> <li>Ability to research and understand compliance regulations including state and federal statutes and regulations</li> <li>Develops a comprehensive and advanced working understanding of healthcare compliance to help ensure an effective compliance program</li> <li>Ability to investigate concerns</li> <li>Assists in managing conflict of interest, compliance related disclosures, and/or sanction screening</li> <li>Ability to implement action plans and other compliance program activities</li> <li>Ability to develop policies and educate workforce</li> <li>Has conceptual knowledge of theories, practices and procedures within healthcare or regulatory/compliance discipline</li> <li>Works directly with, and provides guidance to management regarding potential compliance risks, issues, or concerns</li> </ul> |
| Problem Solving<br>Abilities                                | <ul> <li>Ability to recognize and articulate<br/>risks to senior leaders and the<br/>Board when information may be<br/>incomplete</li> </ul>  | <ul> <li>Ability to articulate risk, evaluate<br/>control environment, assess for<br/>emerging issues and prioritize audit<br/>plan</li> </ul>  | <ul> <li>Ability to solve problems<br/>independently and timely</li> <li>Recommends process<br/>improvements</li> </ul>  | <ul> <li>Ability to solve problems<br/>independently and timely</li> <li>Recommends process improvements</li> </ul>   | <ul> <li>Ability to solve problems<br/>independently and timely</li> <li>Recommends process<br/>improvements</li> </ul>   |

| Skill Set | <ul> <li>Ability to influence decision making<br/>to effectively mitigate risk</li> <li>Models the mission, vision and</li> </ul>   | <ul> <li>Ability to read, analyze, and interpret</li> </ul>   |   | <ul> <li>Strong interpersonal, verbal, and</li> </ul>  | Requires excellent verbal and   |
|-----------|---|---|---|--|---|
|           | <ul> <li>Models the mission, vision and values of the instituion/health system</li> <li>Ability to apply critical thinking skills and anticipate potential impact across the Health System/Enterprise</li> <li>Ability to maintain confidentiality, earn trust, detect and respond to unethical behavior or conflicts of interest</li> <li>Stategic and ability to oversees large scale change</li> <li>Excellent project and change management skills for designing and implementing high priority System initiatives in a complex environment</li> <li>Execellent communication skills: Ability to articulate material risk and corrective action plans to Executive Leadership and the Board</li> <li>Ability to adhere and manage budgets and resource utilization needs</li> </ul> | <ul> <li>Ability to read, analyze, and interpret<br/>information (e.g., professional journals,<br/>technical coding guidelines, and<br/>governmental regulations)</li> <li>Presents executive summaries of audit<br/>and review results along with<br/>corrective action taken to Executives<br/>(i.e. CEO and COO), and respective<br/>Boards</li> <li>Ability to adhere and manage budgets<br/>and resource utilization needs</li> <li>Lead education programs</li> </ul> | <ul> <li>Project management; ability to analyze data and reports</li> <li>Ability to investigate and perform root cause analysis</li> <li>Ability to manage staff and engage in effective communications</li> </ul> | <ul> <li>written communication skills</li> <li>Strong analytical skills</li> <li>Prepares draft reports and<br/>recommends corrective actions</li> </ul> | <ul> <li>Requires excellent verbal and written communication skills. Must be able to clearly express thoughts and ideas</li> <li>Must possess the ability to effectively transfer knowledge to others</li> <li>Ability to educate and cascade information related to regulations and guidance</li> <li>Thorough knowledge of health care concepts, regulations, principles and practices</li> <li>Ability to problem solve and analyze risks</li> <li>Develops strategies, plans, and policies to meet the organziation's needs to maintain an effective compliance program</li> <li>Ability to provide strategic advice and ability to provide advice on the operational impact of regulatory compliance.</li> </ul> |

| PRIVACY                             | Director, Privacy Program<br>& Compliance Education  | Manager, Privacy<br>Program  | Privacy Specialist<br>(Lead)   | Privacy Specialist<br>(Senior)   | Privacy Specialist<br>(Intermediate)   | PrivacySpecialist<br>(Associate)<br>CURRENTLY<br>NOT<br>APPLICABLE TO<br>PRIVACY<br>PROGRAM   |
|-------------------------------------|--|--|--|--|--|---|
| [HR Title]                          | [Compliance Director]  | [Compliance Manager]   | [Compliance Specialist,<br>Lead]   | [Compliance Specialist,<br>Senior]   | [Compliance Specialist,<br>Intermediate]   | [Compliance<br>Specialist,<br>Associate]  |
| HR Level                            | 10   | 13   | 12   | 10   | 9  | 7   |
| QUALIFIC-<br>ATIONS                 | <ul> <li>Certified Healthcare<br/>Compliance (CHC)<br/>and/or CHC-Privacy (or<br/>take CHC-P exam and<br/>achieve certification no<br/>later than 24 months<br/>from hire date.)</li> <li>Additional certification is<br/>encouraged but not<br/>required</li> </ul> | <ul> <li>Certified Healthcare<br/>Compliance (CHC)<br/>and/or CHC-Privacy (or<br/>take CHC-P exam and<br/>achieve certification no<br/>later than 24 months<br/>from hire date.)</li> <li>Additional certification is<br/>encouraged but not<br/>required</li> </ul> | <ul> <li>Certified Healthcare<br/>Compliance (CHC)<br/>and/or CHC-Privacy (or<br/>take CHC-P exam and<br/>achieve certification no<br/>later than 24 months<br/>from hire date.)</li> <li>Additional certification is<br/>encouraged but not<br/>required</li> </ul> | <ul> <li>Certified Healthcare<br/>Compliance (CHC) and/or<br/>CHC-Privacy (or take<br/>CHC-P exam and achieve<br/>certification no later than<br/>24 months from hire date.)</li> <li>Additional certification is<br/>encouraged but not<br/>required</li> </ul> | <ul> <li>Certified Healthcare<br/>Compliance (CHC)<br/>and/or CHC-Privacy (or<br/>take CHC-P exam and<br/>achieve certification no<br/>later than 24 months<br/>from hire date.)</li> <li>Additional certification is<br/>encouraged but not<br/>required</li> </ul> | Not Applicable<br>(Qualifications less<br>than a Privacy<br>Specialist,<br>Intermediate<br>currently do not<br>apply to Privacy<br>Program) |
| QUALIFIC-<br>ATIONS -<br>Experience | 10+years HIPAA Privacy<br>and/or HIPAA, or<br>equivalent combination<br>of education, experience,<br>and/or demonstrated<br>performance with high<br>level work quality &<br>productivity  | 9+years HIPAA Privacy<br>and/or HIPAA, or<br>equivalent combination<br>of education,<br>experience, and/or<br>demonstrated<br>performance with high<br>level work quality &<br>productivity  | <ul> <li>7+years HIPAA Privacy<br/>and/or HIPAA security,<br/>or equivalent<br/>combination of<br/>education, experience<br/>and/or demonstrated<br/>performance with high<br/>level work quality &amp;<br/>productivity</li> </ul>                                  | <ul> <li>4-7+ years HIPAA Privacy<br/>and/or HIPAA security, or<br/>equivalent combination of<br/>education, experience,<br/>and/or demonstrated<br/>performance with high<br/>level work quality &amp;<br/>productivity</li> </ul>                              | 1-4 years HIPAA Privacy<br>and/or HIPAA security,<br>or equivalent<br>combination of<br>education, experience,<br>and/or demonstrated<br>performance with high<br>level work quality &<br>productivity   | Not Applicable  |
| Duties                              | <ul> <li>Lead the planning and<br/>development of system-<br/>wide awareness/<br/>education program re<br/>HIPAA Privacy (and<br/>Compliance Program<br/>overall)</li> <li>Coordinate and<br/>streamline health system<br/>compliance education</li> </ul>           | <ul> <li>Assist with planning and<br/>development of system-<br/>wide awareness/<br/>education re HIPAA<br/>Privacy (and<br/>Compliance Programs,<br/>as applicable)</li> <li>Assists Director in<br/>assuring accuracy,<br/>consistency and</li> </ul>              | Assists Privacy     Manager, Director and     other Privacy     Specialists in Privacy     Program and other     Compliance Activities,     which could include     reviewing internal     processes, documents     and reports, and                                 | Assists Privacy Manager,<br>Director and other Privacy<br>Specialists in Privacy<br>Program and other<br>Compliance Activities,<br>which could include<br>reviewing internal<br>processes, documents and<br>reports, and ensuring<br>compliance with internal    | Assist Privacy Manager<br>and Director in all<br>Privacy Program and<br>other Compliance<br>activities, which could<br>include reviewing internal<br>processes, documents<br>and reports, etc. and<br>ensuring compliance with                                       | Not Applicable  |

|        | efforts across multiple                             | appropriate            | ensuring compliance   | and external regulatory                                    | internal and external                    |                |
|--------|---|------------------------|---|--|--|----------------|
|        | units/departments to                                | documentation and      | with internal and   | framework.   | regulatory framework.                    |                |
|        | ensure thoroughness,                                | tracking               | external regulatory   | <ul> <li>Analyze, compare and</li> </ul>                   | <ul> <li>Analyze, compare and</li> </ul> |                |
|        | consistency and                                     |                        | framework.  | evaluate various courses                                   | evaluate various courses                 |                |
|        | accuracy of content.                                |                        | Analyze, compare and  | of action and able to make                                 | of action and able to                    |                |
|        |   |                        | evaluate various  | independent decisions on                                   | make independent                         |                |
|        |   |                        | courses of action and   | matters of significance,                                   | decisions on matters of                  |                |
|        |   |                        | able to make  | free from immediate  | significance, free from                  |                |
|        |   |                        | independent decisions   | direction, within scope of                                 | immediate direction,                     |                |
|        |   |                        | on matters of   | responsibilities.  | within scope of                          |                |
|        |   |                        | significance, free from                                       | <ul> <li>Primary activities and</li> </ul>                 | responsibilities.                        |                |
|        |   |                        | immediate direction,  | decision-making authority                                  | Primary activities and                   |                |
|        |   |                        | within scope of   | are predominantly  | decision-making                          |                |
|        |   |                        | responsibilities.   | performed independently                                    | authority are                            |                |
|        |   |                        | Primary activities and  | affecting business   | predominantly performed                  |                |
|        |   |                        | decision-making   | operations to a substantial                                | independently affecting                  |                |
|        |   |                        | authority are   | degree.  | business operations to a                 |                |
|        |   |                        | predominantly   | Conducts investigations                                    | substantial degree.                      |                |
|        |   |                        | performed   | involving greater  |  |                |
|        |   |                        | independently affecting                                       | complexity, analysis and                                   |  |                |
|        |   |                        | business operations to a                                      | advisory activities.                                       |  |                |
|        |   |                        | substantial degree.   |  |  |                |
|        |   |                        | <ul> <li>Serves as an expert in</li> </ul>                    |  |  |                |
|        |   |                        | HIPAA Privacy Program   |  |  |                |
|        |   |                        | and able to advise  |  |  |                |
|        |   |                        | others on HIPAA   |  |  |                |
|        |   |                        | regulations and   |  |  |                |
|        |   |                        | operational application                                       |  |  |                |
|        |   |                        | to specific scenarios.  |  |  |                |
|        |   |                        | <ul> <li>Interprets internal or</li> </ul>                    |  |  |                |
|        |   |                        | • Interprets internal of<br>external business                 |  |  |                |
|        |   |                        | issues and recommends   |  |  |                |
|        |   |                        | solutions and/or best   |  |  |                |
|        |   |                        | practices.  |  |  |                |
|        |   |                        |   |  |  |                |
|        |   |                        | <ul> <li>Resolves complex<br/>issues using a broad</li> </ul> |  |  |                |
|        |   |                        | perspective to identify                                       |  |  |                |
|        |   |                        | solutions and works   |  |  |                |
|        |   |                        |   |  |  |                |
|        |   |                        | independently with little                                     |  |  |                |
| Dution |   | Conduct the second     | guidance.   | Conduct the neurobaning of                                 | Conduct the second                       | Not Applicable |
| Duties | Oversight of all Privacy     Drogram investigations | Conduct thorough       | Conduct thorough  | Conduct thorough privacy     investigations investigations | Conduct thorough                         | Not Applicable |
|        | Program investigations,                             | privacy investigations | privacy investigations  | investigations involving                                   | privacy investigations                   |                |
|        | breach risk assessments,                            | involving greater      | involving greater   | greater complexity and                                     | with peer and/or                         |                |

| acc<br>am<br>app<br>doc<br>trac<br>• Cre<br>das<br>Priv<br>act<br>priv<br>viol   | icking, etc. to assure<br>curacy, consistency<br>nong cases, and<br>propriate<br>cumentation and<br>icking<br>eates and provides<br>shboard reporting on<br>ivacy Program<br>tivities, including<br>vacy allegations,<br>olations, and breaches   | <ul> <li>complexity and with<br/>continued increased<br/>independence, and able<br/>to independently<br/>provide oversight/<br/>assistance for peers in<br/>doing the same</li> <li>Provides assistance,<br/>advice and guidance to<br/>team members in<br/>handling complex cases</li> </ul>  | <ul> <li>complexity and with<br/>continued increased<br/>independence, and<br/>assists/advises peers in<br/>doing the same</li> <li>Independently handles<br/>higher level of<br/>complexity than junior<br/>staff, assists junior staff<br/>with complex cases</li> </ul>  | <ul> <li>with increased level of<br/>independence</li> <li>Seeks and receives<br/>assistance/advice from<br/>team members, dependent<br/>upon complexity of cases</li> <li>Independently handles<br/>higher level of complexity<br/>than Privacy Specialist,<br/>Intermediate staff</li> <li>Assists Privacy Specialist,<br/>Intermediate staff with<br/>complex cases</li> </ul>  | supervisory<br>direction/oversight,<br>seeks and receives<br>assistance/advice from<br>team members,<br>dependent upon<br>complexity of cases.   |                |
|--|---|--|---|--|--|----------------|
| <ul> <li>Procession</li> &lt;</ul> | evelop Privacy<br>ogram and<br>ompliance Program<br>ucation efforts for<br>/brid Covered Entity<br>overed Components<br>d, as applicable, in<br>llaboration<br>entify and report on<br>etrics re Privacy<br>ogram; identify metrics<br>evaluate the<br>fectiveness of the<br>alth system<br>mpliance effort in<br>gard to policy and<br>ucation.<br>imary HIPAA Privacy<br>visor to the Chief<br>ompliance Officer<br>epresent<br>CO/Compliance<br>ogram for all<br>diences, including all<br>adership levels<br>re, manage all Privacy<br>ogram Staff<br>ad planning and<br>velopment of system- | <ul> <li>Assist planning and<br/>development of system-<br/>wide incident reporting<br/>system</li> <li>Assist the planning and<br/>development of system-<br/>wide privacy education<br/>&amp; IT Security Audit<br/>Team in the security<br/>awareness program</li> <li>Recommend for hire,<br/>manage Privacy<br/>Specialists and/or<br/>specific Privacy<br/>Program<br/>Projects/Components</li> <li>Lead planning,<br/>development and<br/>implementation of<br/>Privacy Risk<br/>Assessment Program</li> <li>Primary Liaison to<br/>health system and<br/>institutional units</li> <li>Participate and/or lead<br/>campus privacy and<br/>security liaison quarterly<br/>meetings and serve as<br/>primary contact to<br/>liaisons for Privacy</li> </ul> | <ul> <li>Attend Privacy Program committees, as assigned, to facilitate education of HIPAA Privacy risks/solutions and communication within the organization</li> <li>Mentor guide junior staff</li> <li>Participate on or lead Privacy Program and Compliance Program projects</li> <li>Privacy Program Policy Development, Review and Revision</li> <li>Project Management</li> <li>Maintain through regular review and revision of HIPAA Training modules and related content</li> <li>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</li> </ul> | <ul> <li>Reviews the investigation<br/>and breach risk<br/>assessment work of peers<br/>and junior staff</li> <li>Mentors and guides<br/>Intermediate Privacy<br/>Specialist</li> <li>Assists manager/director in<br/>supervising and performing<br/>final review of Intermediate<br/>and Associate auditor work</li> <li>Actively participates in<br/>Privacy Program<br/>committees to facilitate<br/>communication,<br/>interaction, relationship-<br/>building, etc.</li> <li>Participates in policy<br/>review and development</li> <li>Takes ownership of<br/>customer requests as<br/>received or assigned</li> <li>Proposes and implements<br/>improvements to risk<br/>assessment tools and audit<br/>software</li> </ul> | <ul> <li>Attends Privacy Program<br/>committees to facilitate<br/>communication,<br/>interaction, relationship-<br/>building, etc.</li> <li>Participates in policy<br/>review and development</li> <li>Responds to customer<br/>requests as received or<br/>assigned</li> <li>Assists with incident<br/>management</li> <li>Assists with Privacy<br/>Program messages and<br/>education materials</li> <li>Reports to Privacy<br/>Manager or Director,<br/>Privacy Program, as<br/>applicable</li> </ul> | Not Applicable |

| <ul> <li>wide HIPAA Privacy<br/>compliance plan</li> <li>Senior-level Liaison to<br/>system and institutional<br/>units; Lead Privacy<br/>Program education<br/>efforts for Hybrid<br/>Covered Entity Covered<br/>Components in<br/>collaboration with</li> <li>Recommends and<br/>represents HIPAA<br/>Privacy Program for<br/>health system<br/>Compliance</li> <li>Manage program related<br/>finances</li> <li>Demonstrable leadership<br/>skills as depicted by HR<br/>Leadership Competency<br/>Plan</li> <li>Demonstrable<br/>management and<br/>supervisor skills including<br/>staff development,<br/>performance eval and<br/>management, team<br/>building, and effective<br/>communication skills</li> <li>Demonstrable<br/>skills/ability to develop<br/>educational materials<br/>with knowledge of adult<br/>learning styles, various<br/>learning.</li> </ul> | <ul> <li>Program-related<br/>activities.</li> <li>Participate on or lead<br/>Privacy Program and<br/>Compliance Program<br/>projects</li> <li>Demonstrable<br/>management and<br/>supervisor skills<br/>including staff<br/>development,<br/>performance evaluation<br/>and management, team<br/>building, and modeling<br/>effective communication<br/>skills</li> <li>Demonstrable project<br/>and time management<br/>skills</li> <li>Effective communication<br/>skills</li> <li>Reports to Director<br/>Privacy Program and<br/>Compliance Education</li> </ul> | <ul> <li>Demonstrable project<br/>and time management<br/>skills</li> <li>Effective communication<br/>skills</li> <li>Reports to Privacy<br/>Manager or Director,<br/>Privacy Program, as<br/>applicable</li> </ul> | <ul> <li>Assists manager/director in compiling reports for leadership of aggregate risk assessment findings</li> <li>May develop privacy and/or security awareness messages and education materials in collaboration with the Director of Compliance Policy &amp; Education</li> <li>Reports to Director Privacy Program and Compliance Education</li> <li>Reports to Director Privacy Program and Compliance Education</li> <li>Mastery of Breach Risk Assessment and Breach Incident Management process</li> <li>Consistent quality work product</li> <li>Established track record of good customer relationships</li> <li>Demonstrated interest in and ability to solve problems – for both customers and team</li> </ul> |  |  |
|---|--|---|--|--|--|
|---|--|---|--|--|--|

|                  | Compliance Specialist Associate | Compliance Specialist, Intermediate | Compliance Specialist, Senior | Compliance Specialist, Lead |
|------------------|---------------------------------|-------------------------------------|-------------------------------|-----------------------------|
| Specialist Level |                                 |                                     |                               |                             |

| Minimum Education                                | Bachelor's degree or equivalent<br>combination of education and work<br>experience   | Bachelor's degree or equivalent<br>combination of education and work<br>experience  | Bachelor's degree or equivalent<br>combination of education and work<br>experience   | Bachelor's degree and higher degree<br>in healthcare, nursing, law, or other<br>related field or an equivalent<br>combination of education and work<br>experience.   |
|--|--|---|--|--|
| Minimum Work<br>Experience                       | At least 1-year relevant work<br>experience in healthcare, compliance<br>or an equivalent combination of<br>education, experience, and/or<br>demonstrated performance with high<br>level work quality & productivity | At least 3 years relevant work experience<br>in healthcare, compliance or an equivalent<br>combination of education, experience,<br>and/or demonstrated performance with<br>high level work quality & productivity  | At least 5 years' relevant work<br>experience in healthcare, compliance<br>or an equivalent combination of<br>education, experience, and/or<br>demonstrated performance with high<br>level work quality & productivity<br>Experience with health laws and<br>regulations, accreditation standards,<br>or senior level healthcare operations<br>experience. | At least 7 years' relevant work<br>experience in healthcare, compliance<br>or an equivalent combination of<br>education, experience, and/or<br>demonstrated performance with high<br>level work quality & productivity<br>Experience with health laws and<br>regulations, accreditation standards,<br>or senior level healthcare operations<br>experience. |
| Oversight/Level of<br>Supervision Needed         | Develops competence by performing<br>structured work assignments.<br>Receives instruction, guidance and<br>direction from others.<br>Works under direct supervision from a<br>program director.                      | <ul> <li>Develops competence by performing structured work assignments. Receives instruction, guidance and direction from others.</li> <li>Works under a moderate supervision.</li> <li>Performs a range of mainly straightforward assignments.</li> <li>Uses prescribed guidelines or policies to analyze and resolve problems.</li> </ul> | Comfortable taking ambiguous work<br>assignments and creating a clear and<br>concise work product.<br>Receives a minimal level of guidance<br>and direction.<br>Able to independently manage<br>multiple on-going complex projects.  | Comfortable taking ambiguous work<br>assignments and creating a clear and<br>concise statement of work.<br>This is the most senior skill level<br>without supervisory responsibility<br>Able to independently manage<br>multiple on-going highly complex<br>projects.  |
| Provision of<br>Guidance/Assistance<br>to Others |  |   | Lead investigations or project steps<br>within a broader project or may have<br>accountability for ongoing activities or<br>objectives   | Lead investigations or project steps<br>within a broader project or may have<br>accountability for ongoing activities or<br>objectives;<br>Provides assistance, advice and<br>guidance to team members in<br>handling complex cases;   |

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

|  | Strong analytical skills that enable the<br>Specialist to effectively identify and<br>monitor issues. | Strong analytical skills that enable the<br>Specialist to independently and<br>effectively identify and monitor issues,<br>with the ability to quickly analyze<br>issues, make practical business-<br>oriented recommendations.<br>Prepares draft reports and<br>recommends corrective actions<br>clearly and concisely.<br>Ability to speak to large audiences,<br>with strong presentation skills.<br>Ensures that compliance risks are<br>addressed and corrective actions are<br>taken, as appropriate;<br>Mentors junior team members of the<br>Program to develop their knowledge<br>and skills to work independently. | Strong analytical skills that enable the<br>Specialist to independently and<br>effectively identify and monitor issues,<br>with the ability to quickly analyze<br>issues, make practical business-<br>oriented recommendations.<br>Prepares draft reports and<br>recommends corrective actions clearly<br>and concisely.<br>Ability to speak to large audiences,<br>with strong presentation skills.<br>Ensures that compliance risks are<br>addressed and corrective actions are<br>taken, as appropriate;<br>Mentors junior team members of the<br>Program to develop their knowledge<br>and skills to work independently. |
|--|---|--|--|
|--|---|--|--|

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