



Murray County Medical Center Position Description

Classification: Compliance/HIPAA Privacy Specialist
Department: Administration
Location: Murray County Medical Center
Reports to: CEO
FLSA Classification: Salaried/Exempt

Position Purpose

Murray County Medical Center (MCMC) established and maintains a Compliance and HIPAA Privacy Program. We created a part-time position to serve as Compliance and Privacy Officer (CPO) to provide direction and oversight of all ongoing activities related to the implementation and maintenance of our program and to ensure staff understand and adhere to our compliance and privacy requirements. The CPO serves as the primary contact for our Compliance and HIPAA Privacy Program and is expected to make themselves available to employees, patients, and others who have questions or wish to report concerns. The CPO reports directly to the Chief Executive Officer (CEO) on issues related to compliance and privacy and attends leadership and Board meetings when these topics are on the agenda.

The CPO is a part-time position and as such will have other duties at MCMC. However, in accordance with guidance from the United States Department of Health and Human Services Office of Inspector General, and to ensure a clear separation of duties, the CPO may not be involved in the billing, coding, or submission of claims. In addition, the CPO may not have any responsibility for the performance or supervision of legal services to MCMC.

Job Activities

<i>Percent of Job</i>	<i>Major Activity</i>
25%	Compliance Program Oversight
35%	HIPAA Privacy Oversight
40%	Other duties as Assigned.

100% Total

Education and Experience

- Associate's degree in relevant field preferred.
- 3 years' experience in health care (Compliance/HIPAA Privacy preferred).
- Ability/willingness to achieve certification in health care compliance or privacy within one year of being in position.

General Requirements

Incumbent must have:

1. Understanding of state and federal guidelines for an effective compliance program.
2. Familiarity with standards for safeguarding protected health information.
3. Understanding of the regulatory rules and consequences of non-compliance, such as those for Medicare and Medicaid.

Duties and Responsibilities Specific to the Compliance/Privacy Program

1. Coordinate development/implementation of the corporate compliance program to include HIPAA Privacy requirements.
2. Maintain working knowledge of compliance and HIPAA Privacy issues, laws, and regulations.
3. Coordinate the development and maintenance of MCMC's Code of Conduct.
4. Develop and implement Compliance Program policies and procedures, to include HIPAA Privacy policies and procedures, and ensure distribution of these documents to all employees and, as appropriate, identified vendors.
5. Collaborate with Human Resources to ensure that all staff acknowledge receipt of the Code of Conduct and other relevant compliance- and HIPAA-related policies.
6. Develop a workplan to review all compliance- and HIPAA-related policies at least annually and update as needed.
7. Report to the CEO on a routine basis (weekly, bi-weekly).
8. Establish and manage reporting channels for compliance concerns (e.g., Hotline).
9. Track and resolve all compliance and privacy concerns reported through these channels.
10. Develop and deliver or oversee the delivery of Compliance and HIPAA Privacy training at onboarding, annually, and when deemed necessary (collaborate with HR to ensure that all staff complete training as directed).
11. Oversee screening of all covered persons, including employees, contractors, vendors, and medical professionals in accordance with OIG guidance (collaborate with HR to address any positive screens).
12. Collaborate with leadership to identify compliance risks and develop and implement appropriate and timely corrective action plans to mitigate risks and prevent similar future risks.
13. Conduct/oversee compliance investigations and audits, identify compliance issues and resolve identified issues.
14. Collaborate response to violations and notify the appropriate internal and external parties in a timely manner.
15. Collaborate with Health Information Management and other applicable organization units in overseeing patient rights to inspect, amend and restrict access to PHI when appropriate.
16. Cooperate with state and federal enforcement agencies in any compliance or HIPAA Privacy reviews or investigations.
17. Conducting a risk assessment in the event of an unauthorized disclosure of protected health information and, based on the assessment, recommend to the CEO if the disclosure is considered a breach to be reported to the HHS Office for Civil Rights.
18. Oversee breach notification in accordance with MCMC policy.
19. Review all requests by patients for restricted communication, amending their medical record, and accounting of disclosures and advise the CEO accordingly.

- 20. Ensure Business Associate Agreements (BAAs) are fully executed with all vendors who meet the definition of a business associate (BA) and maintain a file for all executed BAAs.
- 21. Receive reports from all sources regarding BAs' compliance with applicable privacy policies and terminating contracts with Business Associates, when necessary, if the BA is not in compliance with the BAA or with HIPAA regulatory requirements.

Skills

- 1. Demonstrated strong organizational, facilitation, communication, and presentation skills.
- 2. Ability to lead, guide, and direct the corporate-wide compliance program
- 3. Demonstrated skills in collaboration, teamwork, and problem-solving to achieve goals.
- 4. A high level of integrity and trust.

Working Conditions and Physical Demands

- 1. The noise level in the workplace is mild. Voice must be accurate, audible and quick to convey detailed or important spoken instructions.
- 2. This position requires frequent sitting, and intermittent walking, standing, bending, stooping, kneeling, and squatting.
- 3. Keyboarding is frequent as is repetitive motion.
- 4. Must have good vision to read medical records, fine print on computers and various equipment.
- 5. Work performed has a continuously high degree of detail and degree of deadlines.
- 6. Must be able to deal with concerns of upset patients or other clinic staff and must be able to display control and confidence under stress.

Equipment Operation

Utilize standardized office equipment that includes computer, phone, printer, fax machine, scanner, copier, and calculator.

Supervisory Responsibilities

No direct supervisory responsibilities.

Employee Signature: I have read and agree that I can perform the essential functions of this position.

Print Name

Signature

Date

Supervisor

Date