

Sample Job Description Chief Compliance Officer

Job Title: Chief Compliance Officer	Grade/FLSA:	Dept/Business Unit: Government & Regulatory Affairs	Job Code:
Reports To (Supervisor's Title):	Human Resources Approval:		Date:

Position Summary: *(Briefly state the primary purpose of the job in terms of how it contributes to the department objectives):*

This position functions as the Chief Compliance Officer for **XXXXXX** and its subsidiaries **XXXXXX**. As a result, this position has direct access to the Board of Directors for the purpose of advising and making recommendations to the Board about regulatory compliance issues. This position, additionally, has the function of directing **XXXXXX** employees in regulatory compliance; maintaining the effectiveness of the Corporate Compliance Program; serving as primary corporate resource for Medicare/Medicaid reimbursement information; maintaining **XXXXXX** compliance with applicable federal and state rules and regulations pertaining to the distribution of medical supplies and importing of medical devices; and acting as a consultative resource for reimbursement and regulatory issues. The individual who holds the position also manages the Government and Regulatory Affairs department.

Essential Duties and Responsibilities: *(List the job's essential most important functions and responsibilities. Include all important aspects of the job-whether performed daily, weekly, monthly or annually; and any that occur at irregular intervals. In considering whether a job task is "essential", ask yourself if the job will be significantly changed if that task is not performed. If your answer is "yes" then the task is essential - please mark those tasks with an asterisk (*);*

* Advising and directing **XXXX** employees in regulatory compliance: This key result area includes the following responsibilities:

- Disseminating information to and educating of **XXXXXX** employees regarding a broad spectrum of compliance related topics (e.g., Corporate Charitable contributions, Fraud and Abuse Laws, Safe Medical Devices Act);
- Maintaining a current working knowledge of Federal and State regulations and policies as they affect **XXXXXX** through routine review of various Health Care Financing Administration ("HCFA") manuals, DMERC manuals, Federal Register notices, applicable government and/or industry related internet information sites, multiple stated Medicaid manuals, and multiple State Board of Pharmacy regulations;
- Functioning as key company representative/liaison in meetings with HCFA, Medicare carriers, Medicaid Agencies, other federal/state agencies, and industry organizations regarding regulatory policy;
- Providing education and training about actual, proposed, or pending legislation and regulations that affect operations and identifying operational obstacles to compliance, and working with other employees to identify and implement solutions, and
- Reporting to the Board of Directors on compliance-related matters as appropriate or whenever called upon to do so.

- * Maintaining the effectiveness of the Corporate Compliance Program: This key result area is achieved by overseeing and monitoring the Corporate Compliance Program through:
 - Creation/revision of applicable XXXXXX policies,
 - Measurement of compliance by conducting routine and/or focused internal audits of policy/procedure adherence as well as coordinating audits generated by external sources,
 - Development, coordination and participation in routine multifaceted educational and training programs that focus on the elements of the Compliance Program thus striving to ensure that all appropriate employees and management are knowledgeable of, and comply with, pertinent Federal and State Health care program requirements;
 - Coordination of follow-up and resolution to XXXXXX ValuesLine reports/inquiries or other compliance related reports/inquiries,
 - Screening of Corporate Charitable Contribution requests; and
 - Periodic revision of Corporate Compliance Program in light of changes in the organization's needs, and in the statutes, rules, regulations, and requirements of Federal and State health care programs.

- * Serving as the primary corporate resource for Medicare/Medicaid reimbursement information: This key result area is achieved by:
 - Maintaining and communicating knowledge of payer claim submission guidelines and coverage requirements through routine education of applicable employees on such guidelines and requirements;
 - Providing direction in problem claim management which may include assuming total responsibility for specialized projects or assuming a directorial role in assisting other corporate departments with resolution;
 - Acting as key negotiator in payer disputes;
 - Developing and maintaining positive rapport with payers, HCFA, and other applicable federal/state government agencies;
 - Obtaining and maintaining all appropriate licensure/providerships as applicable and coordinating the reconciliation of any providership issues and/or problems; and
 - Analyzing government and/or public policy and alerting the corporation to trends and risks.

- * Protecting XXXXXX interests which may be affected by proposed legislative and/or regulatory issues: This key result area includes the following responsibilities:
 - Communicating XXXXXX comments/concerns regarding proposed legislation or impending implementation of policies to appropriate legislators, HCFA officials, industry organizations, customer base or other entities as applicable; and;
 - Developing and maintaining XXXXXX image as a key player and ethical voice in related health care issues through participation in industry organizations.

* Maintaining XXXXXX compliance with applicable federal and state rules and regulations affecting the distribution of medical supplies, prescription drugs, and legend medical devices: This key result area includes the following responsibilities:

- Obtaining and maintaining appropriate licensure and/or registration for distribution centers;
- Coordinating Product Recalls and maintaining corporate policy/procedure;
- Submitting, as applicable, MedWatch product incident reports to the Food & Drug Administration pursuant to the Safe Medical Devices Act; and
- Monitoring and reporting on federal state rules and regulations (e.g., FDA rulings, individual state boards of pharmacy regulations) that may affect XXXXXX wholesale/retail distribution of medical supplies, prescription drugs, and legend medical devices.

Other Duties as assigned.

Supervisory Responsibilities: *(List the number of employees supervised and their job titles.)*

Five employees are supervised as follows:

- 1 FTE: Manager, Government & Regulatory Affairs
- 1 FTE: Auditor, Government & Regulatory Affairs
- 1 FTE: Coordinator, Government & Regulatory Affairs
- 1 FTE: Manager, XXXXXX
- 1 FTE: Manager, Clinical Services

General Information:

This position required contact with the numerous external sources (e.g., Medicare Carriers, Medicaid Agencies, Insurance Agencies, Hearing Officers, Administrative Law Judges, Nursing Facility Accounts, Beneficiary Guarantors, Industry Organizations, the Health Care Financing Administration, Food and Drug Administration, State Boards of Pharmacy, other federal/state offices, attorneys, and consultants).

This position requires contact with the following internal sources: XXXXXX Board of Directors, All XXXXXX departments and subsidiaries, warehouses, sales force and contracted employees.

This position carries with it the responsibility of keeping XXXXXX informed on numerous key compliance related issues. Information must be accurate, and judgment must be sound. Responsibilities are varied and approximately 10% travel is required. The Chief Compliance Officer is required to make presentations to the Board of Directors, customers, employees, federal/state agencies and industry organizations. As a result the position requires a professional image/demeanor as well as an extremely responsible working attitude with oral and written communication skills being an absolute necessity. Also, extensive knowledge of federal/state rules and regulations affecting health care providers/distributors is essential, and the holder of this position must exhibit

the highest level of integrity and ethics. This position requires an individual who is self-motivated, goal oriented and flexible to frequently shifting priorities. The holder of this position is frequently required to provide immediate response/assistance to the organization and its employees.

Qualifications Requirements:

A. Education and/or Experience: (Describe the minimum level of formal knowledge, education and training and experience required to perform satisfactorily in this position.)

- College degree required.
- 7+ years industry related experience in health care corporate compliance.
- Background in Medicare and Medicaid reimbursement and fraud and abuse laws.

B. Mathematical Skills

- Ability to work with mathematical concepts and to apply concepts such as fractions, percentages, ratios and proportions to practical situations is required. The holder of the position is responsible for preparing and managing the department budget.

C. Certificate, Licenses, Registrations:

- None

D. Other Skills and Abilities

- Strong interpersonal and communication skills
- Clear, concise and persuasive writing and presentation skills
- Strong orientation to deadline and detail
- Demonstrated ability to work effectively and congenially with employees at diverse levels
- Strong Word Processing PC Skills
- Capable of motivating personnel
- Decisive and exercises good judgment under pressure.
- Ability to deal with a variety of abstract and concrete variables.
- Ability to manage a diverse and demanding workload.