



JOB DESCRIPTION: Executive Management Team

JOB TITLE: VP, Corporate Compliance

Job Code	FLSA Status	Last Updated Date
Applies To		

Job Information

Department: Compliance

Reports to (Title): Bassett Healthcare Network Audit and Compliance Committee, Chief Legal Officer

BHN Guiding Principle: OneBassett Systemness

Definition: Demonstrated understanding and awareness of all network wide implications, in terms of clinical, operational and financial decision making.

- Behaviors
- Actions
- Results

BHN Values

Courage

- We embrace challenges and quickly develop innovative approaches to change
- We speak up and are heard when we have concerns or suggestions
- We display the highest levels of professionalism, integrity, respect, and personal responsibility

Unity

- We are role models of equity and inclusion in our organization and in our communities
- We embrace our diversity and are better because we are “different together”
- We are ONEBASSETT. We work across departments and organizations as one team
- We are strongly committed to the well-being of every caregiver and practitioner



Excellence

- We provide every patient with an exceptionally safe, high quality and positive experience
- We offer outstanding educational experiences for future healthcare professionals
- We conduct innovative research that leads to better care and health in our rural communities

EMT Competencies

- **Instills Trust** - Gains the confidence and trust of others through honesty, integrity and authenticity.
- **Situational Adaptability / Emotional Intelligence** - Adapts approach and demeanor real time to match the shifting demands of different situations
- **Values Differences and Drives Engagement** - Recognizes the value of different perspectives and cultures as well as creates a climate for top performance
- **Cultivates Innovation** – Creates new and better ways for the organization to be successful.
- **Develops Top Talent** – Develops people to meet both their career goals and the organization’s goals.
- **Builds Effective Teams** – Builds strong-identity teams that apply their diverse skills and perspectives to achieve common goals.
- **Manages Complexity** – Makes sense of complex, high quantity information to effectively solve problems.
- **Communicates Effectively** – Develops and delivers multi-mode communications that convey a clear understanding of the unique needs of different audiences.
- **Independent and Diversity of Thought / Drives Accountability** – Provides direction, delegates and removes obstacles, drawing from innate judgement to cultivate diversity, belonging, inclusion and equity.
- **Optimizes Work Processes** – Knows the most effective and efficient processes to get things done, with a focus on continuous improvement.
- **Organizational Savvy** – Maneuvers comfortably through complex policy, processes, and people-related organizational dynamics.

Job Summary



The VP, Corporate Compliance oversees the Corporate Compliance Program for Bassett Healthcare Network and all affiliates of Bassett Healthcare Network, functioning as an independent and objective body that reviews and evaluates compliance issues/concerns. The position takes steps to promote compliance by the Board of Trustees, management and employees with the rules and regulations of regulatory agencies, that company policies and procedures are being followed, and that behavior in the organization meets Bassett’s Code of Conduct. The Compliance Officer serves as the focal point for compliance activities. The Compliance Officer needs to be a person of high integrity, and any other duties the Compliance Officer has should not be in conflict with the compliance goals. Coordination and communication are the key functions of the Compliance Officer with regard to planning, implementing, and monitoring the compliance program. This position reports to the Bassett Healthcare Network Audit and Compliance Committee and Chief Legal Officer. The VP of Compliance has direct access to the Boards of Trustees on compliance issues and the status of the Compliance Program. Compliance Officer retains oversight and accountability for reporting to Bassett Healthcare Network, Board Audit, and Compliance Committees.

Minimum Requirements

Education

Required/Preferred	Education Level	Description
Required	Bachelor’s	
Preferred	Advanced degree	Healthcare graduate degree
Preferred		JD desired

Years of Experience

Required/Preferred	Minimum Years of Experience	Description
Required	3 years	experience in legal issues in a healthcare environment required

License/Certification

Required/Preferred	License/Certification	Description
Required	Certification	Healthcare Compliance Certification must be obtained within 1 year from date of hire



Skills

- Knowledge of business and management principles involved in strategic planning, budgets, financial metrics, resource allocation, human resources modeling, leadership technique, and coordination and timing of people and resources
 - Working knowledge of and utilization of systems thinking methodologies
 - Strong analytical skills
 - Must have exemplary interpersonal skills, with an ability to communicate effectively (both verbal and written) with those from diverse backgrounds, as well as those in senior leadership levels in the organization.
 - Ability to define problems and identify complex variables in situations with limited standardization processes, and work towards solutions.
 - Ability to work within common computer systems and programs
 - Ability to assess, problem solve, and make decisions based on the data available
 - Ability to present data in various formats, and various forums to varied audiences
 - Ability to implement change
 - Ability to work as a leader and as part of a team
 - Ability to influence and develop collaborative relationships, building cooperation in the pursuit and achievement of organizational goals
 - Ability to effectively work with individuals internal and external to the organization
 - Ability to organize often changing work priorities and meet specific objectives under time constraints.
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Physical Requirements

Work Type

Sedentary Work - Exerting up to 10 lbs of force occasionally, and/or a negligible amount of force frequently or constantly to lift, carry, push, pull or otherwise move objects. Sedentary work involves sitting most of the time. Jobs are sedentary if walking or standing are required only occasionally, and all other sedentary criteria are met.

Essential Physical Requirements

Walking

Lifting

Working Conditions



Hazards

Atmospheric Conditions

Travel

Occasional Travel - The job may require travel from time- to-time, but not on a regular basis.

Physical Requirements - Original

- Ability to sit and work at computer for extended periods of time
- Walking, sitting, lifting no more than 25 pounds
- Must be willing to travel to network hospitals and other sites as needed
- Additional physical requirements may be needed for clinical jobs

Essential Job Functions

The following section contains representative examples of work that will be performed in positions allocated to this classification. Bassett Healthcare is a dynamic organization, and the environment can be fluid. Roles and responsibilities can often be expanded to accommodate changing patient or organizational needs and conditions as well as to tap into skills and talents of employees. Accordingly, employees may be asked to perform duties that are outside the specific functions that are listed.

1) Develops and administers Compliance training programs

- Develop, coordinate and document the compliance-related education and training programs.
- Ensure that management and employees are aware of and comply with the Compliance Program, Standards of Conduct, and applicable fraud and abuse laws.
- Ensure that first tier contractors, downstream and related entities, as well as agents who furnish items or services to the health plan or its' members are aware of and compliant with the Compliance Program requirements
- Oversee and monitor the development, functioning and enhancement of the Bassett Healthcare Network and Bassett Medical Center Compliance Programs.
- Chair the Bassett Healthcare Network and Bassett Medical Center Compliance Committee and assist the Committee in developing methods to reduce vulnerability to fraud and abuse, and monitor the effectiveness of the Compliance Program.

2) Develop and maintain Compliance departmental policies.

- Develops initiates, maintains, and revises policies and procedures for the general operation of the Compliance Program and its related activities to prevent illegal, unethical, or improper conduct. Manages day-to-day operation of the compliance program.
- Verify compliance plans against established policies and procedures and applicable regulations.
- Develops and periodically reviews and updates Code of Conduct to ensure continuing currency and relevance in providing guidance to management and employees.



- Develops policies and programs that encourage managers and employees to report suspected fraud and other improprieties without fear of retaliation.
 - Develop and implement policies and procedures to evaluate risk, address fraud and abuse, monitor operational compliance and execute the Bassett Healthcare Network and Bassett Medical Center Compliance Program.
- 3) Receives risk assessments and analyze the effectiveness of the plan, identifying areas for improvement.**
- Develop and implement the annual Compliance Work Plan.
 - Prioritize issues in risk assessments based on level of institution exposure
 - Plan and conduct compliance monitoring reviews including review schedule.
 - Develop recommendations for corrective action based on review findings and works with department management to refine recommendations.
 - Develop presentation for department management on results of review.
 - Prepare written reports including developing recommendations for corrective action and present reports and recommendations to Compliance Committees.
 - Modify and amend the Compliance Program as appropriate to reflect: (a) regulatory changes; (b) changes in the nature or scope of business; (c) outcomes of ongoing monitoring; (d) Internal Audit results; and (e) whenever existing policies require enhancement, or new policies are needed to meet the demands of the business model.
 - Investigate suspected violations of fraud and abuse laws and take corrective action where appropriate.
 - Recommend, oversee and document disciplinary action and other remedial measures where appropriate.
- 4) Perform a variety of administrative duties with latitude for exercising discretion and judgment.**
- Assist on budgetary issues; prepare for approval by department or division head initial budgetary recommendations by considering past requirements and expenditures and present program plans.
 - Maintain liaison with all levels of administration to coordinate department business, accomplish objectives, and facilitate the resolution of problems.
 - Establish a database (ongoing) of other institutions' approaches to compliance, including creation of a materials file.
 - Maintain and update the Compliance Department intranet page.
 - Prepares semi-annual reports to the Board of Trustees detailing compliance initiatives throughout the year.
 - employees involved in the process.
- 5) Ensures compliance with all reporting/monitoring activities: Perform monthly exclusion checks of all employees, providers, volunteers, vendors, and board members. Semi-annual lobbying submission. Annual compliance attestation, others as applicable**
- Utilize software to compare lists compiled from various departments to ensure that there are no matches with state or federal exclusion databases.
 - Ensuring through purchasing that independent contractors and agents who furnish medical services to Bassett Healthcare Network and Bassett Medical Center are aware of the requirements of the compliance program with respect to coding, coverage, billing, and marketing, among other things
 - Monitor changes in relevant regulatory requirements and the review of fraud alerts, program memoranda, and other relevant publications issued by federal or state government agencies, including CMS, HHS OIG, State Department of Medical Assistance, State Department of Insurance and other oversight agencies.
 - Ensure that the health plan submits complete and accurate required reports in a timely fashion.
- 6) Receive, document, and monitor reports of alleged non-compliance, via the Compliance Hotline, or by other various means, to final resolution.**



- Independently investigating and acting on matters related to compliance, including the flexibility to design and coordinate internal investigations (e.g., responding to reports of problems, 'hot-line' calls, or suspected violations) and any resulting corrective actions with all departments, providers and sub-providers, agents and, if appropriate, independent contractors
- 7) Decision Maker**
- Develops and accomplishes objectives, strategies and tactics for Compliance with special emphasis on Annual Operating Plan Objectives. Where appropriate, institutes corrective actions, including reallocating resources, reprioritizes, and/or recommends modifications to established plans.
 - Establishes and/or staffs appropriate intra and interdepartmental committees related to accomplishments of the Annual Operating Plan.
 - Establishes and monitors operating performance standards for the departments which ensure effective day-to-day operation.
 - Supervise and lead the Compliance Department, provide for the development of the team and each individual on the team
- 8) Financial Resource Management**
- Monitors accomplishment of agreed upon objectives at the departmental level; and where appropriate, institutes corrective actions, including reallocating resources, reprioritizing, and/or recommending modifications to established plans.
 - Develops service improvements, management systems, expense control programs etc. to ensure achievement of financial objectives.
- 9) Development of Bassett Network/System Thinking – A Leader who thinks globally and adopts philosophy of continuous improvement for Bassett processes/systems and the Bassett Network.**
- Develops working relationships with all Bassett Network partners to effect positive results.
 - Regularly assesses opportunities to enhance system(s) performance.
 - Develops action plans and completes them to improve customer and employee satisfaction.
 - Connects with counter parts at affiliate sites to actualize potential for adoption of best practices and standardization.
 - Assist affiliate compliance officers with developing educational plans, materials and resources to educate employees in the overall objectives of the compliance program and specific substantive areas of compliance for their organization.
 - Ensure policy and annual work plans are consistent across the network.
- 10) Performs similar or related duties as requested or directed**
- Maintain up-to-date job knowledge through professional reading, conference and seminar attendance.
 - Performs other duties as requested and observed by supervisor or manager.

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*For more information or to apply, please contact **Bob Hussar, Esq., CHC** (518) 487-8258 or send your resume to recruitment@hccconnections.com*