

THE POSITION

Title: Chief Audit and Compliance Officer

Position

Qualifications: The candidate must possess a minimum of a BA or BS and be knowledgeable about healthcare compliance and/or audit. The preferred candidate will have two years experience as a healthcare compliance officer or similar discipline, and possess an advanced degree (i.e., J.D., Ph.D.) or certification (i.e., CPA).

Reporting

Relationship: The Chief Audit and Compliance Officer (CCO) will report to the Audit Committee of the CHOP and CHOPPA Boards of Trustees. He/she will report to the President and CEO of CHOP and the President of CHOPPA, for direction on all operational and administrative matters.

Principal Focus of the Position:

The CCO will be responsible for planning, designing, implementing, and maintaining CHOP and CHOPPA-wide compliance and audit programs, policies, and procedures that promote a corporate culture that fosters ethical and compliant behavior and provides the basis for ensuring adequate internal controls and compliance with all laws and regulatory requirements applicable to CHOP, CHOPPA, and all of their divisions, subsidiaries, and affiliates. He/she will be responsible for the development, dissemination, and implementation of policies, compliance and audit standards, and administrative systems in areas that may include, but are not limited to: accreditation and licensure; tax status; prevention of management fraud and illegal acts; unauthorized use of assets; improper or inadequate documentation and billing; and adherence to regulatory requirements of HCFA, PA Departments of Health and Public Welfare, OSHA, EPA, FDA, OHRP, ADA, IRS, EEO, and wage and hour laws.

The CCO will serve as a role model for compliant behavior consistent with the mission, vision, and values of CHOP and CHOPPA. The CCO will act as the staff member of CHOP's and CHOPPA's Audit Committees. In the near term, the CCO will address the following priorities:

- * Provide effective leadership, advice, and counsel to the Board of Trustees and senior management on matters of corporate compliance and ethical business practices.

Foster open lines of communication and exercise authority to apprise the Board of Trustees and the Office of the President of any issues of concern relating to compliance activities and procedures.

- Provide guidance to management, medical staff, and individual departments so that clinical, research, and administrative managers are aware of their responsibility for ensuring compliance for their areas.
- Initiate, maintain, and publicize a confidential and easily accessible system for employees to report alleged violations of standards without fear of retribution.
- * Implement and maintain a system of management reporting that provides timely and relevant information on all aspects of audit and compliance issues to management and the Chief Audit and Compliance Officer.
 - Develop and ensure efficient processes for documenting all compliance-related initiatives and activities.
 - Establish audit controls and procedures to monitor operational effectiveness and fiscal integrity. Respond to CHOP and CHOPPA performance quality indicators by ensuring complete corrective action.
 - Initially one of the CCO's specific areas of focus will be the development and implementation of a comprehensive organization-wide audit and compliance program which ensures compliance with federal and state billing regulations and the Department of Health and Human Services (HHS) Office of Inspector General's (OIG) Compliance Program Guidelines for Hospitals and Physician Practices.

The ongoing duties and responsibilities of the position will include:

- * Develop and recommend annual compliance and internal audit program work plans and report conclusions and recommendations to the CEO of CHOP, the President of CHOPPA, and the Audit Committees of the CHOP and CHOPPA Boards of Trustees.
 - Develop policies and procedures that set up standards for internal audit and compliance, giving specific guidance to management, medical staff, principal investigators, and individual departments as appropriate.
 - Direct efforts to communicate compliance initiatives, including written materials and training programs designed specifically to promote awareness and understanding of compliance issues, applicable laws and regulations and reporting requirements and consequences of noncompliance.

- Serve as an internal authority on relevant laws and regulations, keeping abreast of current changes that may affect health care systems through personal initiative, seminars, training programs, and peer contact.
 - Lead and/or support specific audits to investigate adherence with policies, procedures, and legal/regulatory requirements to identify and evaluate exposures and to correct defective processes. Provide advice and support to senior management regarding any disciplinary action that may result.
 - Exercise due diligence in concert with management and the Medical Staff to prevent and detect misconduct and wrongdoing. Undertake all reasonable steps to respond appropriately when an offense is detected and prevent future similar offenses. Ensure the enforcement of compliance program standards through appropriate disciplinary mechanisms in concert with the Human Resources Department.
 - Review complaints, concerns, or questions relative to compliance issues and provide consultative leadership and support to all entities as appropriate.
 - Obtain advice, counsel, and information and foster cooperative efforts with management and staff as appropriate, such as General Counsel, Chief Operating Officer, Senior Management, the Medical Staff, Security, and Human Resources.
 - Direct and supervise assigned personnel, including performance evaluations, scheduling, orientation, and training. Make recommendations on employee hire, transfer, promotion, wage change, discipline, termination, and similar actions. Develop and administer departmental policies and procedures. Manage daily operations of the Audit Services and Compliance Department.
 - Support and participate in CHOP and CHOPPA quality improvement initiatives.
 - Other duties as agreed upon between the CCO and CHOP and CHOPPA Senior Managers.
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