

Compliance Officer, CountyCare



Cook County Health, in partnership with Carrington & Carrington, Ltd. Diversity Executive Search, aims to deliver talent and diversity to its workforce.

Prospectus 2023





Introduction

Cook County Health (CCH) is one of the largest public health systems in the United States, providing a range of health services to its patients, health plan members and the larger community. Through the health system and the health plan, CCH serves more than 600,000 unique individuals annually.

The System's hospitals and ambulatory network, including its Primary Care Medical Home model, are Joint Commission accredited. Stroger Hospital also holds certifications and recognitions in stroke, burn, cardiac, perinatal and oncology care and was recently named the most racially inclusive hospital in Illinois by the Lown Institute.

The Cook County Department of Public Health (CCDPH) is the nationally accredited, statecertified public health authority that serves the public health needs of nearly 2.3 million suburban residents in 125 municipalities by focusing on health promotion and prevention, while advocating for and assuring the natural, environmental, and social conditions necessary to advance physical, mental, and social well-being. CCDPH's approach brings residents, partners, and resources together to optimize health and achieve health equity for all people living in suburban Cook County. The department is responsible for the prevention of the spread of nearly 70 reportable communicable diseases and the enforcement of Cook County and Illinois public health laws, rules, and regulations, as well as providing numerous services and programs to promote health and mitigate disease. CCDPH continues to play a critical role throughout the pandemic from public education and distribution of personal protective equipment to implementation of local initiatives to increase access to vaccines for communities most impacted by COVID-19.

Despite competing with national brands, CountyCare stands as the largest Medicaid managed care plan in Cook County and has earned top-quality ratings. CountyCare is also accredited by the National Committee on Quality Assurance. CountyCare receives a capitated per-member per-month payment and pays for services rendered to members within its vast network which includes all CCH facilities, Federally Qualified Health Centers throughout Cook County, community mental health centers and drug treatment centers as well as 4,500 primary care providers, 20,000 specialists and more than 70 hospitals. CountyCare also covers approved home- and community-based services, vision, and dental services, and provides prescriptions through a broad network of pharmacies, including CCH in-person and mail order pharmacy services.

CountyCare Quick Facts

- 430,000 CountyCare members
- \$75M CountyCare reserve funding



Carrington & Carrington, Ltd. Diversity Executive Search Strength Through Diversity and Inclusion

- #1 Quality rating for CountyCare
- #1 CountyCare market share ranking

About the Role

POSITION DESCRIPTION

- **POSITION TITLE:** Compliance Officer, CountyCare
- **REPORTS TO:** Chief Compliance and Privacy Officer

STAFF:

- **ORGANIZATION:** Cook County Health CountyCare
- LOCATION: Chicago, IL
- SUMMARY: The Compliance Officer, CountyCare reflects the mission and vision of Cook County Health (CCH), adheres to the organization's Code of Conduct and Corporate Compliance Program, and complies with all relevant policies, procedures, guidelines, and all other regulatory and accreditation standards. The Compliance Officer, County Care is responsible for the ongoing development, implementation, maintenance, and evolution of the CCH Health Plan compliance program and all related compliance activities. This includes, but is not limited to, the development and subsequent assessment of comprehensive policies and procedures, protocols, compliance training, and internal investigations.

RESPONSIBILITIES:

 Governs the Health Plan's Fraud, Waste, Abuse (FWA) and Financial Misconduct Program (Program Integrity Program) including delegated Special Investigations Unit (SIU) to ensure that Program Integrity Program and FWA initiatives are actively administered and addressed, as delegated by the Chief Corporate Compliance & Privacy Officer:

> o Implements and coordinates communication protocols and methods that encourage CCH workforce/employees, independent contractors, and delegated vendors to report issues related to noncompliance and FWA without fear of retaliation o Coordinates and oversee fraud investigations and referrals conducted by delegated SIU's, where applicable o Collaborates with other Medicaid health plans, HFS, the HFS Office of Inspector General, Medicaid Fraud Control Units (MCFUs), local law enforcement, commercial payers, and other organizations, where appropriate, when a potential FWA issue is discovered that involves multiple parties.



o Ensures that FWA is reported in accordance with federal, state and local requirements, as well as the guidelines in the Medicaid Managed Care regulations at 42 CFR §438.608 and the CCH Managed Care Community Network (MCCN) Agreement with Illinois Department of Healthcare Family Services (HFS)

- Serves in a leadership capacity to develop the Health Plan compliance program in conjunction with the Chief Corporate Compliance & Privacy Officer
- Chairs and facilitates the executive Regulatory Compliance Committee meeting on a quarterly basis
- Develops, implements, maintains, and assesses/updates compliance policies and procedures to ensure adherence with relevant regulatory and requirements
- Modifies health plan policies, procedures, and projects to reflect changes in laws and regulations
- Establishes a structured process for regulatory review, monitoring, and dissemination of information
- Reviews health plan agreements, contracts, addenda, and other relevant documents, as needed
- Oversees, directs, delivers, tracks, or ensures delivery of compliance training and communications, both general in nature and specialty, for employees, workforce, network providers, vendors, and consultants
- Aligns with Health Plans' operations regarding sanction/exclusion checks to verify that CountyCare network providers, employees, workforce, vendors, and consultants (where necessary) are screened against applicable Federal and State sanction and exclusion lists
- Coordinates with Health Plan provider network contracting to ensure new providers undergo a FWA review
- Establishes and administers a process for receiving, documenting, tracking, investigating, and taking action on all compliance concerns: o Investigates reports of alleged non-compliance to determine the validity, nature and scope of the report in conjunction with the designated team members, as identified by the Chief Corporate Compliance & Privacy Officer o Performs interviews with key personnel to validate compliance with established policies and procedures and applicable regulations in conjunction with reports of alleged non-compliance, as deemed necessary o Develop reports each compliance completion of review, which details upon recommendations designed to correct any potential weaknesses or areas of non-compliance discovered during the review o Performs follow-Up reviews to ensure action plans have been adequately implemented

o Collaborates with operational areas to remediate concerns through action plans to correct potential weaknesses and assure ongoing compliance



- Develops and coordinates compliance projects with CCH entities, which may be ad-hoc or delineated in the Compliance Program Annual Work Plan and perform prospective reviews in conjunction other personnel as deemed necessary, and as requested by the Chief Corporate Compliance & Privacy Officer
- Develops vendor-specific annual audit protocols, performs audits, review results, and determines if regulatory and requirements requirement are met
- Produces and delivers Compliance Program reports for CCH and Health Plan Leadership, , the Board of Directors, and/or the Audit and Compliance Committee of the Board of Directors, as directed by the Chief Corporate Compliance & Privacy Officer
- Collaborates with Health Plan Leadership to facilitate operational ownership of compliance
- Monitors operational management of the HealthPlan complaint, grievance, appeals and fair hearing processes for program compliance including review of trends and patterns through reports and data analysis
- Maintains highest levels of confidentiality regarding all departmental operations in both verbal and written and with the use of technology
- Works with minimal supervision and use time effectively
- Maintains a high degree of follow-through despite frequent interruptions
 Performs other duties as assigned

QUALIFICATIONS:

- Experience in a hospital or a large multi-specialty clinic setting with experience in the areas of compliance, audit, risk, quality and/or legal
- Five (5) years recent managerial/supervisory experience in a health plan,
- Three (3) years of conducting complex healthcare analysis and/or investigations
- Project Management experience
- Leadership competencies to include planning and organizing, problem solving, informing, consulting, supporting, and networking
- Knowledge of coding, billing, medical records, review/analysis, and documentation
- Professional Registration/Certification or compliance/fraud related healthcare credentials, current & active, including but not limited to RHIA, CPA, CFE, AHFIM CFE, HIA, HCAFA, MHP or CHC
- Health plan experience
- Knowledge and experience with extensive report development and policy and procedure development
- Knowledge of Health Care Regulatory standards



- Excellent verbal and written communication skills necessary to communicate with all levels of staff and a patient population composed of diverse cultures and age groups
- Familiarity with public speaking and business presentations
- Strong working proficiency with Microsoft Office (Access, Excel, PowerPoint, and Word)
- Demonstrate analytical and organizational, problem-solving, critical thinking, and conflict management/resolution skills
- Demonstrate attention to detail, accuracy, and precision
- Behavioral commitment to quality work and customer service philosophy
- Ability to work in a fast-paced environment, which requires handling multiple tasks at once
- Ability to maintain a professional demeanor and composure when challenged
- Ability to function autonomously and as a team member in a multidisciplinary team
- Ability to travel to and from any CCH locations

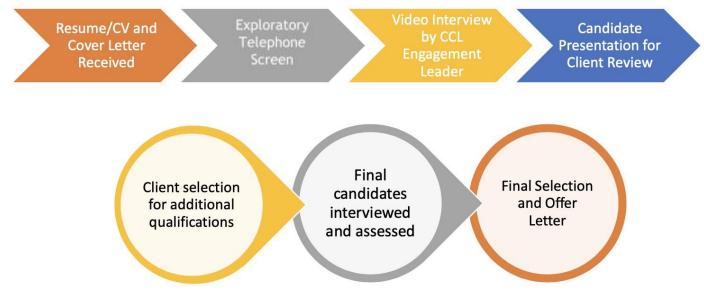
CONTACT:

Qualified candidates expressing interest in the opportunity, please submit a resume/CV and cover letter with <u>Compliance Officer</u> in the subject line to <u>COCC@carringtonandcarrington.com</u>

This position is exempt from Career Service under the CCH Personnel Rules



Cook County Health has retained Carrington & Carrington, Ltd. (CCL) to process, review, and evaluate all candidates for this role. The following chart indicates the candidate selection process.



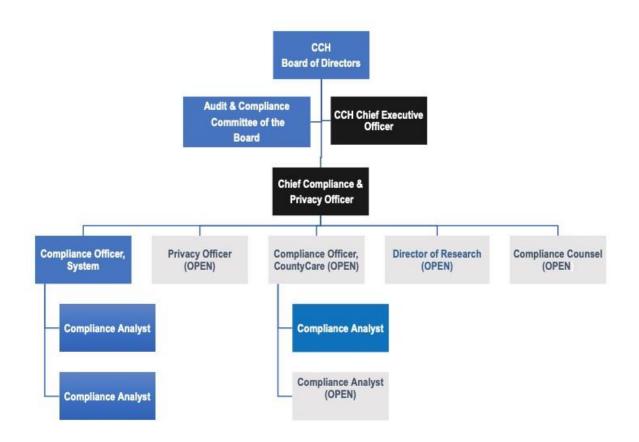
- Candidate Assessment Questionnaire may be required prior to Client submittal. The assessment questionnaires consist of 5-10 questions. This is also an excellent way to clarify your candidacy specific to the role as well as supplement our assessment to determine the right fit for this role.
- Employment and Education verifications are completed prior to Client submittal. Carrington & Carrington, Ltd uses a third-party service to conduct the verification service. All information provided is secured for privacy.
- Reference Checks are completed only if an offer letter is given.

Equal Employment Opportunity

Cook County Health provides equal employment opportunities to all employees and applicants for employment and prohibits discrimination and harassment of any type without regard to sex, sex stereotyping, pregnancy (including pregnancy, childbirth, and medical conditions related to pregnancy, childbirth, or breastfeeding), race, color, religion, ancestry or national origin, age, disability status, medical condition, marital status, sexual orientation,



gender, gender identity, gender expression, transgender status, protected military or veteran status, citizenship status, genetic information, or any other characteristic protected by federal, state or local laws. This policy applies to all terms and conditions of employment, including recruiting, hiring, placement, promotion, termination, layoff, recall, transfer, leaves of absence, compensation, and training.



Cook County Health is recognized for providing a safe and high-quality system of care. Here are some of their recognitions and accreditations:

- Ambulatory Care Certification, The Joint Commission
- Primary Care Medical Home Certification, The Joint Commission
- Hospital Accreditation, The Joint Commission
- Hospital Accreditation, The Joint Commission
- Advanced Certification for Primary Stroke Centers, The Joint Commission and The American Heart Association/American Stroke Association



- Academic Comprehensive Cancer Care Program Accreditation, American College of Surgeons, Commission on Cancer; American College of Surgeons
- National Burn Center Verification, American Burn Association
- Level III NICU and Administrative Perinatal Hospital designation, Illinois Department of Public Health
- Level 1 Adult and Pediatric Trauma Center, Illinois Department of Public Health
- Dialysis Unit Certification, Illinois Department of Public Health
- U.S. News and World Report, High Performing Hospital for COPD
- U.S News and World Report, High Performing Hospital for heart attack care
- U.S News and World Report, High Performing Hospital for heart failure care
- U.S News and World Report, High Performing Hospital for pneumonia care
- American Heart Association, 2020 Mission: Lifeline® STEMI Receiving Center Gold Recognition Award
- American Heart Association, 2020 Get with The Guidelines® Heart Failure Silver Award with Target Type 2 Diabetes Honor Roll
- Hospital Accreditation, The Joint Commission
- Advanced Certification for Primary Stroke Centers, The Joint Commission and The American Heart Association/American Stroke Association
- Academic Comprehensive Cancer Care Program Accreditation, American College of Surgeons, Commission on Cancer; American College of Surgeons
- National Burn Center Verification, American Burn Association
- Level III NICU and Administrative Perinatal Hospital designation, Illinois Department of Public Health
- Level 1 Adult and Pediatric Trauma Center,
- Illinois Department of Public Health
- Dialysis Unit Certification,
- Illinois Department of Public Health
- U.S. News and World Report,
- High Performing Hospital for COPD
- U.S News and World Report,
- High Performing Hospital for heart attack care
- U.S News and World Report,
- High Performing Hospital for heart attack care
- American Heart Association, 2020 Mission: Lifeline® STEMI Receiving Center Gold Recognition Award
- American Heart Association, 2020 Get with The Guidelines® Heart Failure Silver Award with Target Type 2 Diabetes Honor Roll
- Accredited Health Department, Public Health Accreditation Board