

UW HEALTH POSITION DESCRIPTION

POSITION SPECIFICS		
Title: System VP, Business Integrity, Chief Compliance Officer	Department/Number: Executive/1000129	
Reports to: Senior VP/Chief Administrative Officer		
Job Code: 1145	FLSA Status: Exempt	
Manager Approval: K Lambrecht Date: May 2025		HR Approval: C Richard Date: May 2025
POSITION SUMMARY		
<p>Under the leadership of the Senior VP/Chief Administrative Officer and with direct access to the UW Health Chief Executive Officer (CEO), this position has responsibility for the areas of Compliance (i.e. Reimbursement, Research Billing, and Pharmacy Compliance including 340b and Drug Diversion), Privacy, Conflict of Interest, and Internal Audit. In addition to direct authority over these areas, this position also has a dotted line responsibility for IS Security.</p> <p>The VP, Business Integrity is positioned within the organization to have significant authority and exercise independent judgment without fear of reprisal, allowing employees to bring problems or concerns to that person's attention with confidence that the organization will respond. As a result, the System VP, Business Integrity, Chief Compliance Officer, Chief Privacy Officer has direct access to:</p> <ul style="list-style-type: none"> • UW Health CEO • Audit Committee of the UW Hospitals and Clinics Authority Board • Compliance Committee of the UW Hospital and Clinics Authority Board • Swedish American Health System Board • UW Health Chief Legal Officer • Legal counsel, both internal and external (in coordination with the Chief Legal Officer) • Leadership for the medical school, medical group and hospital • Senior management 		
MAJOR RESPONSIBILITIES		
<p><u>Administrative Leader</u></p> <ul style="list-style-type: none"> • Provides overall leadership, direction and coordination of operations, finances, space, and human resources for all operating areas within range of responsibility. • Develops and/or implements appropriate institutional policies and procedures to enhance efficient and effective operations and delivery of services within areas of responsibility. • Translates strategic plans and budget targets into operational action plans that guide resource allocation and the coordination and direction of personnel; direct operations in areas of responsibility to achieve the annual operating plan. • Ensures appropriate resource management, given workload volumes and institutional budgets, in human resources, materials and capital. • Implements all aspects of human resource management to foster employee and faculty engagement and ensures effective staffing and optimal human resource performance. • Applies principles of asset management in areas of responsibility and achieves optimal effectiveness in material and equipment management. • Effectively lead and administer the following responsibilities and activities for UW Health including all of its wholly and majority owned subsidiaries: <ul style="list-style-type: none"> ○ Responsible for assessing the regulatory environment and organizational risk regarding the development and delivery of written standards of conduct, policies and procedures designed to establish a culture of compliance and ethical conduct. ○ Ensures maintenance of an effective compliance program consistent with the recommendation of the Office of the Inspector General ○ Accountable for compliance with regulatory requirements including but not limited to HIPAA, Fraud & Abuse Laws, EMTALA, Stark, and Anti-Kickback regulations, documentation, coding & billing of facility and professional fee reimbursement including the research compliance billing. Responsible for compliance with CMS, FDA, DEA, OPA and other governmental regulatory requirements related to pharmacy compliance, 340b, and drug diversion. Oversees all ongoing activities related to development, implementation, maintenance of, and adherence to policies and procedures covering privacy of and access to protected health information (PHI) in compliance with federal and state laws and health system privacy practices. ○ Accountable for overall administration of the Internal Audit Department and its broad functions ○ Responsible for examining and evaluating all financial and operational activities of UW Health within the broad constraints of audit standards and outside regulations. (e.g.: Generally Accepted Accounting Principles as prescribed by the American Institute of Public Accountants, Generally Accepted Auditing Standards as 		

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prescribed by the American Institute of Public Accountants and the Institute for Internal Auditors, and governmental regulations affecting the healthcare industry). In collaboration with the Chief Information Security Officer, review of all system-related information security plans through-out the organizations' network to ensure alignment between security and privacy practices, and acts as a liaison to the information systems department.

- In collaboration with the Chief Information Security Officer, ensures that security standards comply with statutory and regulatory requirements regarding health information.
- In collaboration with the Chief Information Security Officer, ensures that appropriate security measures and mechanisms are in place to guard against unauthorized access to electronically stores and/or transmitted patient data and protect against reasonable anticipated threat and hazards.
- Responsible for developing, maintaining, and ensuring compliance to appropriate policies related to potential conflicts of interest for all employees of UW Health and health care providers associated with UW Health.
- Provides oversight and direction for the maintenance of all UW Health system policies and procedures. Ensures maintenance of a conflict-of-interest process for faculty, staff, and governance members. Maintains knowledge of regulatory requirements regarding conflict of interest to ensure UW Health meets all requirements. Works closely and collaboratively with the UW School of Medicine and Public Health to coordinate administration of conflicts of interest policies impacting medical staff members.
- Provides appropriate oversight of research compliance issues in the clinical environment. In collaboration with the Senior Director and Chief Clinical Research Officer review clinical quality issues including compliance with applicable regulatory standards and state and federal laws governing research
- Assists with the Senior Director, Digital Health and Emerging Technologies and Chief Information Security Officer with the Governance and onboarding of Artificial Intelligence Technology in clinical and non-clinical environments.
- Provides staff support to the UWHCA Board of Directors - Audit and Compliance Committees.

Strategic Planning

- Participate in the development of the institutional strategic plan to ensure accomplishment of the mission and vision of UW Health
- Facilitate development of the organization long range business integrity plan which effectively supports achievement of the strategic plan.
- Guide and direct strategic planning for areas of responsibility

Advisor

- Serves as an advisor and consultant to the Chief Administrative Officer and other UW Health leaders on matters within areas of responsibility.
- Provides advice and information to the Board of Directors and committees on matters within areas of responsibility.

All duties and requirements must be performed consistent with the UW Health Performance Standards.

POSITION REQUIREMENTS		
Education	Minimum	Bachelor's degree in a relevant field
	Preferred	Advanced degree in relevant subject area
Work Experience	Minimum	Eight years of experience working in healthcare compliance and healthcare privacy.

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	Preferred	<ul style="list-style-type: none"> • Experience in an academic health center or large health system • Experience leading Business Integrity functions for both hospital and physician group practices
Licenses & Certifications	Minimum	Certified in Healthcare Compliance or holding other certifications by the Compliance Certification Board, or equivalent, Certified in Healthcare Privacy Compliance or holding other certifications by the Compliance Certification Board, or equivalent, Certified in Internal Audit or holding other certifications by the Institute of Internal Auditor, or equivalent, and Certified in Information Technology Auditing or holding other certifications by the ISACA, or equivalent
	Preferred	
Required Skills, Knowledge, and Abilities		<ul style="list-style-type: none"> • Broad knowledge of healthcare business integrity, administration, systems, practices and principles. • Knowledge of the principles and practices of supervision and administration as applied to the management and direction of personnel within areas of accountability. • Knowledge of and ability to use various computer programs and applications. • Knowledge of computerized systems to assist in the development of departmental systems. • Effective oral and written communication skills. • Effective human relations abilities. • Ability to effect collaborative alliances and promote teamwork. • Ability to insure a high level of employee, patient, visitor, and external stakeholder satisfaction. • Effective organizational, planning, controlling, scheduling and project management abilities. • Effective managerial and administrative abilities as applied to the management of multiple projects. • Effective leadership abilities.

AGE – SPECIFIC COMPETENCY

Identify age-specific competencies for direct and indirect patient care providers who regularly assess, manage and treat patients.

Instructions: Indicate the age groups of patients served either by direct or indirect patient care by checking the appropriate boxes below. Next,

<input type="checkbox"/>	Infants (Birth – 11 months)	<input type="checkbox"/>	Adolescent (13 – 19 years)
<input type="checkbox"/>	Toddlers (1 – 3 years)	<input type="checkbox"/>	Young Adult (20 – 40 years)
<input type="checkbox"/>	Preschool (4 – 5 years)	<input type="checkbox"/>	Middle Adult (41 – 65 years)
<input type="checkbox"/>	School Age (6 – 12 years)	<input type="checkbox"/>	Older Adult (Over 65 years)

Job Function

Review the employee's job description, and identify each essential function that is performed differently based on the age group of the patient.

PHYSICAL REQUIREMENTS

Indicate the appropriate physical requirements of this job in the course of a shift. *Note: reasonable accommodations may be made available for individuals with disabilities to perform the essential functions of this position.*

Physical Demand Level		Occasional Up to 33% of the time	Frequent 34%-66% of the time	Constant 67%-100% of the time
X	Sedentary: Ability to lift up to 10 pounds maximum and occasionally lifting and/or carrying such articles as docket, ledgers and small tools. Although a sedentary job is defined as one, which involves sitting, a certain amount of walking and standing is often necessary in carrying out job duties. Jobs are sedentary if walking and standing are required only occasionally and other sedentary criteria are met.	Up to 10#	Negligible	Negligible

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<p>Light: Ability to lift up to 20 pounds maximum with frequent lifting and/or carrying of objects weighing up to 10 pounds. Even though the weight lifted may only be a negligible amount, a job is in this category when it requires walking or standing to a significant degree.</p>	<p>Up to 20#</p>	<p>Up to 10# or requires significant walking or standing, or requires pushing/pulling of arm/leg controls.</p>	<p>Negligible or constant push/pull of items of negligible weight.</p>
<p>Medium: Ability to lift up to 50 pounds maximum with frequent lifting/and or carrying objects weighing up to 25 pounds.</p>	<p>20-50#</p>	<p>10-25#</p>	<p>Negligible-10#</p>
<p>Heavy: Ability to lift up to 100 pounds maximum with frequent lifting and/or carrying objects weighing up to 50 pounds.</p>	<p>50-100#</p>	<p>25-50#</p>	<p>10-20#</p>
<p>Very Heavy: Ability to lift over 100 pounds with frequent lifting and/or carrying objects weighing over 50 pounds.</p>	<p>Over 100#</p>	<p>Over 50#</p>	<p>Over 20#</p>
<p>List any other physical requirements or bona fide occupational qualifications:</p>			