



Job Title: Senior Director, Compliance

Position reports to: **Primary:** Senior Vice President, Solutions and Member Engagement
Secondary: Audit and Compliance Committee of the Board of Directors

Department: Member Services / Compliance

FTE: Full-Time

About Healthix:

Healthix is part of a nationwide movement to improve our health care system through better access to information. Healthix is the largest public health information exchange (HIE) in the nation, bringing together over 550 healthcare organizations at more than 4,400 sites across New York City and Long Island. We provide secure access to clinical data of more than 16 million patients to improve quality of care, efficiency and effectiveness. Healthix delivers actionable patient data electronically 24/7 in real time, with patient consent and consistent with regulations and policies established by NYS DOH. Healthix mission is, to support healthcare providers and health plans to provide more effective treatment and care management.

Position Summary:

The Senior Director of Compliance is responsible for overseeing and monitoring Healthix staff, Participants and contractors' compliance with Federal and State laws and regulations relating to the provision of services by Healthix and the privacy of patient data in Healthix. In order to accomplish this, he/she:

1. Oversees the Compliance Department staff and functions. Develops Healthix policies and procedures for use by staff, Participants and contractors, to comply with relevant federal and state laws and regulations and corresponding decisions of the Healthix Board of Directors.
2. Maintains and executes a compliance and audit program ensuring that staff, Participants and contractors adhere to Healthix policies, forms and procedures.
3. Ensures that Healthix meets all criteria established by New York State Department of Health to operate as a Qualified Entity.
4. Manages incident response plan in alignment with New York eHealth Collaborate guidelines

The Senior Director of Compliance serves as the Privacy Officer.

Responsibilities:

- Manage compliance and audit staff members and oversee the Compliance Department, including training and audit functions. Drive Participant engagement and collaborate with all areas of the Healthix team.
- Represent Healthix on committees developing policies for HIEs in New York State to comply with Federal and State laws and regulations to protect the privacy of patient data.
- Develop changes to Healthix policies, forms and procedures in response to changes in Federal and State laws and regulations and decisions of the Healthix Board of Directors.

- Together with the CEO and executive leadership, convene the Privacy Committee of Healthix Participants and the Audit and Compliance Committee of the Healthix Board of Directors, in support of the above activities.
- Execute and continuously improve an effective compliance program, including compliance work-plan, addressing Federal and State regulatory requirements governing health information exchange.
- Act as a liaison with governmental, regulatory and other agencies with respect to issues of privacy and compliance.
- Oversee the development and implementation of training programs for staff, Participants and contractors in matters of compliance, and ensure their understanding of Federal and State requirements and Healthix policies, as appropriate to their responsibilities.
- Coordinate audits of activities of staff and contractors to ensure compliance.
- Coordinate audits of Participants that address at a minimum: 1) authorizing users, 2) capturing patient consent, 3) using data accessed with patient consent, and 4) Break the Glass and Public Health accesses to patient data without patient consent.
- Conduct privacy assessments.
- Work with all units in Healthix to ensure readiness for external and internal audits required for continuing certification as a Qualified Entity in the State Health Information Network of New York.
- Coordinate or participate in investigating reports of possible failures of data integrity or unethical or improper business practices, and recommend corrective action and ensure that it is completed. Manage and update incident response plan in the event of data breach or unauthorized access.
- Review the subcontractors and agents that will have access to patient information and ensure Healthix enters into service provider agreements with them. Respond to alleged violations of privacy regulations, business associate agreements or Healthix policies. Respond to alleged violations of service provider agreements by Healthix subcontractors and agents.
- Develop disciplinary and other corrective action procedures to assure Healthix policies, including privacy policies, are followed.
- Maintain, monitor the ComplianceLine (24/7 compliance hot line) and investigate issues generated by anonymous callers.

The Senior Director of Compliance has authority to review all documents and other information relevant to compliance activities, including but not limited to patient records, contracts, marketing initiatives, and Healthix's relations and activities with third parties.

Education and Experience:

Bachelor's degree required. Master's Degree preferred.

Certification in Healthcare Compliance or equivalent certification is a plus.

A minimum of five years compliance experience or equivalent in a healthcare environment.

Knowledge and understanding of Federal and State laws and regulations related to privacy of healthcare data, including Healthcare Insurance Portability and Accountability Act (HIPAA), Health Information Technology for Economic and Clinical Health Act (HITECH), and preferably also New York State regulations including Privacy and Security Policies and Procedures for Qualified Entities and their Participants in New York State under 10 NYCRR 300.3(b)(1).

Experience in managing a team of people: recruiting, developing, training, advancing, terminating.

Sufficient technology acumen to understand data workflows among disparate IT systems.

Application:

Interested individuals are invited to apply at careers@healthix.org.