

SHORE HEALTH SERVICES, INC. - ADMINISTRATIVE

COMPLIANCE OFFICE JOB DESCRIPTION

- ✓ Shore Memorial Hospital ✓ Shore Rehab ✓ Shore Life Care ✓ MMC
✓ Shore Health Care at Home ✓ Lingle/Goldstein Surgical Assoc.

Written: 7/98

Reviewed: 7/29/98 Revised:

Adopted by the Board: 7/29/98 Board Reviewed: 5/31/00,
6/27/01

POSITION TITLE: Compliance Officer

REPORTS TO: President/CEO and Board of Trustees

SUPERVISES: Compliance Office

POSITION PURPOSE:

The Compliance Officer for Shore Health Services, Incorporated ("SHORE") provides direction and oversight of the SHORE Compliance Program. The Compliance Officer is responsible for identifying and assessing areas of compliance risk for the hospital, as well as other affiliates (Shore Life Care and Shore Rehab); communicating the importance of the Compliance Program to executive management and the Board of Trustees of SHORE; preparing and distributing the written Code of Conduct setting forth the ethical principles and policies which are the basis of the Compliance Program; developing and implementing education programs, addressing compliance and the Code of Conduct; implementing a retaliation-free internal reporting process including an anonymous telephone reporting system; and collaborating with executive management to effectively incorporate the Compliance Program within a system operations and programs and to carry out the responsibilities of the position.

RESPONSIBILITIES AND AUTHORITIES:

- 1) Exercise overall responsibility and authority for developing, implementing, and managing the SHORE Compliance Program, including:
 - a) Ensuring that the Compliance Program effectively presents and/or detects violation of law, regulations, SHORE policies or the Code of Conduct;
 - b) Regularly reviewing the Compliance Program and recommending appropriate revisions and modifications, including advising administrative leadership and the Board of Trustees of potential compliance risk areas;

- c) Coordinating resources to assure the ongoing effectiveness of the Compliance Program;
 - d) Implementing and operating retaliation-free reporting channels including an anonymous telephone reporting system available to all SHORE employees, volunteers and affiliated providers;
 - e) Developing effective communications with all departments and functions within SHORE regarding the Compliance Program;
Developing education programs for all SHORE employees and affiliated providers designed to communicate the Code of Conduct and compliance-related policies;
 - g) Ensuring that internal controls are capable of preventing and detecting significant instances or patterns of illegal, unethical, or improper conduct by SHORE employees, agents, affiliated providers or others working with the organization;
 - h) Ensuring that the system has effective mechanisms to reasonably determine that persons either promoted to or hired in management and certain other sensitive and/or responsible positions (to be designated) do not have a propensity to violate federal or state laws and regulations or engage in improper or unethical conduct in their designated areas of responsibility;
 - i) Providing input and/or direction to Human Resources policies and procedures, and the performance appraisal and incentive programs to ensure that improper conduct is discouraged and that support of and conformity with the Compliance Program is part of any performance evaluation process for all employees;
 - J) Coordinating as appropriate with legal counsel, conducting or authorizing and overseeing investigations of matters that merit investigation under the Compliance Program and making appropriate recommendations as to whether such investigations should be done internally or externally, depending upon the issue(s) involved and available resources;
 - k) Overseeing follow-up and, as applicable, resolution to investigations, and other issues generated by the Compliance Program, including development of corrective action plans, as needed; and
 - l) Tracking all issues referred to the Compliance office.
2. Develop productive working relationships with all levels of management.
 3. Present periodic and annual report on the Compliance Program to the SHORE Board of Trustees.
 4. Develop and implement, upon approval by executive management and the Board of Trustees, an annual review of and update to the Compliance Program.
 5. Report on a regular basis to the Compliance Committee on matters involving the Compliance Program. Additionally, the Compliance Officer at his/her discretion is expected to regularly report issues to the President/CEO and Board of Trustees.

6. Working with administrative leadership provide adequate information to employees of SHORE to ensure that they have the requisite information and knowledge of regulatory issues and requirements to carry out their responsibilities in a lawful and ethical manner.
7. Supervise all other positions in the Compliance Office as may be necessary.
8. Perform other duties as assigned from time to time by the President/CEO.
9. Represent the Compliance Office and function on appropriate SHORE committees.
10. Serve as staff to the Compliance Committee including developing appropriate agendas, reports and information as directed from time to time by the Committee.

REPORTING/WORKING RELATIONSHIPS:

The Compliance Officer shall report directly to the SHORE President/CEO. In addition, the Compliance Officer is empowered to report, at his/her discretion, directly to the Board of Trustees or a designated Board Committee. The Compliance Officer interacts regularly with all levels of a health system including the Board of Trustees, administrative leadership, management, staff position and others.

POSITION REQUIREMENTS:

1. Education: The minimum academic credentials include a college degree with preference for a person with a CPA or other appropriate advanced degree or work experience equivalent.
2. Experience: The position requires a minimum of 10 years of experience in operations auditing, compliance, organizational ethics or other relevant senior level experience in a related field.
3. Values, Skills and Abilities: Demonstrated ability to develop effective working relationships with Board members, management, medical staff and general staff.

Ability to develop a working knowledge of relevant compliance areas, regulatory and enforcement matters;

Ability to effectively lead an effort to educate all levels of the system with respect to the Code of Conduct and other aspects of the Compliance Program;

Ability to effectively document implementation of the Compliance Program; and

Demonstrated evidence of good judgment, delegation skills, ability to prioritize and provide effective follow-up, and willingness to effectively address difficult situations.