



Stanford MEDICINE

*Search for the Chief Compliance Officer
Stanford Health Care and Stanford Medicine Children's Health
Stanford, California*

THE SEARCH

Stanford Health Care and Stanford Medicine Children's Health seek an experienced, collaborative, and innovative leader to be their next Chief Compliance Officer. The SHC/SMCH Chief Compliance Officer (CCO) is a senior-level position that develops, implements, and maintains an effective institutional compliance program to prevent, monitor, detect, and respond to non-compliant activities. The SHC/SMCH Chief Compliance Officer oversees the direction, management, and strategic goal setting for the SHC/SMCH Office of Compliance and Privacy, supports the compliance and risk directions for Stanford Health Care, Stanford Medicine Children's Health, Stanford Medicine Partners, Stanford Health Care Tri-Valley, The Packard Children's Health Alliance, The Lucile Packard Foundation for Children's Health, and other affiliate clinical organizations, and provides oversight for the additional teams of Compliance professionals who are dedicated to supporting Stanford Medicine Partners, Stanford Health Care Tri-Valley, The Packard Children's Health Alliance, and The Lucile Packard Foundation for Children's Health (who report functionally to the CEOs of those organizations).

Responsible for providing strategic leadership for Stanford Health Care (SHC) and Stanford Medicine Children's Health's (SMCH) Office of Compliance and Privacy, the SHC/SMCH CCO will functionally report to the Presidents and Chief Executive Officers (CEOs) of both Stanford Health Care and Stanford Medicine Children's Health, and maintain reporting lines to the Audit, Compliance, and Enterprise Risk Committees (ACERs) of the SHC, SMCH, and other related Boards of Directors. Additionally, the SHC/SMCH CCO will report indirectly to the SHC/SMCH Senior Vice President for Enterprise Risk Coordination for risk consulting and administrative coordination. They will also maintain working relationships with a number of partners, including the Office of the General Counsel (OGC), Internal Audit, SHC and SMCH Human Resources, SHC and SMCH Chief Financial Officers, Stanford Medicine leaders for Information Technology and Information Security, SHC/SMCH Risk Management and Insurance, the Stanford University Compliance Office, and the Stanford University Office of the Chief Risk Officer. This individual will lead an office of more than 30 professionals, including Compliance Program Integrity and Compliance Billing Integrity, as well as the SHC/SMCH Chief Privacy Officer and Privacy Assurance team.

SHC and SMCH are world-renowned organizations that consistently rank among the best hospitals in the country. Through research and a drive for discovery, Stanford Health Care and Stanford Medicine

Children's Health are at the leading edge of medical advancement. Their doctors and staff work constantly to find new ways of helping patients overcome disease, live healthier, and feel more comfortable with the healthcare process.

For more information about Stanford Health Care, please visit <https://stanfordhealthcare.org>.

For more information about Stanford Medicine Children's Health, please visit <http://www.stanfordchildrens.org>.

ABOUT STANFORD HEALTH CARE AND STANFORD MEDICINE CHILDREN'S HEALTH

Stanford Health Care, along with Stanford Health Care Tri-Valley and Stanford Medicine Partners, is part of Stanford Medicine's adult health care delivery system. Combining clinical care, research, and education to advance the understanding and practice of medicine, SHC provides compassionate, coordinated care personalized for the unique needs of every patient.

The Stanford Medicine Children's Health network is the only health care network in the Bay Area that is exclusively dedicated to pediatric and obstetric care. This network provides care in more than 150 medical specialties, many of which are part of the centers of excellence including: brain and behavior, cancer, heart, pregnancy and newborn, pulmonary, and transplant.

Stanford Medicine is an ecosystem comprising the School of Medicine and the pediatric and adult health care delivery systems. Collectively, this ecosystem supports research, education, and clinical care for patients of all ages. Stanford Health Care and Stanford Medicine Children's Health strongly support its continuous goal of pioneering cutting-edge therapies that will change how healthcare is delivered in the future.

ABOUT THE SHC/SMCH OFFICE OF COMPLIANCE AND PRIVACY

The SHC/SMCH Office of Compliance and Privacy provides the framework and processes for identifying, assessing, mitigating, and monitoring compliance risks for Stanford Health Care and Stanford Medicine Children's Health. The programs of the office include the following.

SHC/SMCH Compliance Program Integrity provides direction and guidance for establishing and maintaining effective oversight and coordinates efforts to advise, partner, and engage the Stanford community to uphold the highest standards of ethics, objectivity, and integrity. This program owns the Code of Conduct and related matters at Stanford Health Care and Stanford Medicine Children's Health, including review and monitoring of 18 compliance-focused policies. This program oversees compliance with conflicts of interest policies, the Stark Law, Anti-Kickback Statute, and Emergency Medical Treatment and Labor Act (EMTALA) and is built upon the Seven Elements of a Highly Effective Compliance and Ethics Program, aligning with global compliance frameworks.

SHC/SMCH Compliance Billing Integrity provides guidance and compliance oversight for hospital billing integrity and professional billing integrity programs, including strategic planning, process improvement,

and oversight of assessment, education, and training; it also leads confidential and complex investigations of potential billing errors and fraud.

SHC/SMCH *Privacy Assurance* provides guidance and services to enable the transparent, ethical, and innovative use of personal data at Stanford Health Care and Stanford Medicine Children's Health, consistent with privacy laws (e.g., Health Insurance Portability and Accountability Act (HIPAA)) and best practices. It also orchestrates efforts to protect patient rights, including, but not limited to, breach response, information blocking, and record access monitoring.

The SHC/SMCH Office of Compliance and Privacy includes more than 30 staff members, including a newly elevated position of SHC/SMCH Chief Privacy Officer, who will report functionally and administratively to the SHC/SMCH Chief Compliance Officer and indirectly to the SHC/SMCH Senior Vice President for Enterprise Risk Coordination. Additional Compliance teams are dedicated to serving Stanford Medicine Partners, Stanford Health Care Tri-Valley, The Packard Children's Health Alliance, and The Lucile Packard Foundation for Children's Health. The Compliance Directors for these entities report indirectly/administratively to the SHC/SMCH CCO and functionally to the CEOs of Stanford Medicine Partners, Stanford Health Care Tri-Valley, The Packard Children's Health Alliance, and The Lucile Packard Foundation for Children's Health.

THE ROLE OF THE SHC/SMCH CHIEF COMPLIANCE OFFICER

Reporting directly to the President and CEO of both SHC and SMCH, the SHC/SMCH Chief Compliance Officer oversees a comprehensive hospital and clinical compliance program that includes, but is not limited to, overseeing compliance with Medicare and Medicaid billing regulations, fraud and abuse laws, applicable state laws including laws for protecting privacy, and the confidentiality of protected health information (HIPAA). The SHC/SMCH CCO identifies and develops initiatives and subcommittees to address and resolve strategic and/or institutional compliance areas of concern. The SHC/SMCH CCO also maintains reporting lines to the Audit, Compliance, and Enterprise Risk Committees of the SHC, SMCH, and other related Boards of Directors and reports indirectly to the SHC/SMCH Senior Vice President for Enterprise Risk Coordination for risk consulting and administrative coordination.

Essential Functions:

- Overseeing the compliance and privacy programs, reviewing them periodically to assess overall effectiveness.
- Leading and managing the organizational compliance program.
- Developing and implementing written policies, procedures, and standards of conduct related to compliance.
- Stewarding compliance committees comprised of senior SHC/SMCH leaders.
- Developing effective lines of communication regarding compliance; receiving complaints and providing information regarding compliance matters.
- Enforcing standards through disciplinary guidelines.
- Developing policies addressing dealings with sanctioned individuals.

- Overseeing compliance, auditing, and training matters relating to appropriate professional and facility fees billing.
- Consulting closely with administration representatives, various departments, and billing personnel to foster and enhance compliance with all applicable compliance requirements.
- Supporting and overseeing the leadership of the program for compliance with patient privacy regulations, including HIPAA.
- Supporting and overseeing the leadership of the programs for compliance and ethics in certain core areas, including EMTALA, patient inducement and referrals laws, and conflicts of interest.
- Presenting reports to the ACERs of the Boards of Directors and making recommendations regarding changes to improve the compliance program.
- Designing and conducting internal monitoring and independent assessments to detect violations of compliance and privacy laws and regulations; leading and participating in risk assessment processes; responding to detected violations; determining the order and frequency of assessments; and developing corrective action plans.
- Developing and maintaining the Code of Conduct and compliance standards and policies.
- Overseeing investigative work regarding information reported on matters of alleged non-compliance (including effective hotline management).
- Providing guidance to CEOs, hospitals, and clinics regarding compliance matters, including methods to improve compliance effectiveness and reduce vulnerability to violations of laws and/or regulations.
- Overseeing compliance training and education.
- Serving as liaison to the University regarding compliance matters.
- Collaborating with the SHC/SMCH Senior Vice President for Enterprise Risk Coordination related to administrative coordination and risk consulting.
- Responding to government investigations and queries regarding compliance matters.

KEY OPPORTUNITIES AND CHALLENGES

Continue to develop and refine the vision, goals, policy, and direction of the SHC/SMCH Office of Compliance and Privacy.

The SHC/SMCH Chief Compliance Officer will lead and guide strategic discussions to identify creative solutions to complex issues facing compliance at SHC and SMCH while establishing a compelling vision for the SHC/SMCH Office of Compliance and Privacy's future. Responsibility for updates, review, approval, implementation, and evaluation of the compliance strategic planning process while integrating broader institutional strategic priorities will fall under the SHC/SMCH Chief Compliance Officer's purview. The SHC/SMCH Chief Compliance Officer will work collaboratively across SHC and SMCH to lead efforts to manage compliance risk and initiatives while supporting conversations to further evolve and clarify the roles and responsibilities of the SHC/SMCH Office of Compliance and Privacy.

Lead a team of high-performing professionals to enhance the support and services of the SHC/SMCH Office of Compliance and Privacy to Stanford Health Care and Stanford Medicine Children's Health.

Building upon the SHC/SMCH Office of Compliance and Privacy's sturdy foundation and expertise in compliance best practices, the SHC/SMCH Chief Compliance Officer will serve as a trusted resource, advocate, and leader for the SHC/SMCH Office of Compliance and Privacy staff. The SHC/SMCH Chief Compliance Officer will bring the executive leadership needed to effectively lead, motivate, and support a team of experienced professionals responsible for bringing an independent, systematic, and objective approach. As a tireless advocate, the SHC/SMCH Chief Compliance Officer will provide organizational leadership that elevates the SHC/SMCH Office of Compliance and Privacy to the next level of professionalism—whether through implementing new administrative systems and processes, examining staffing structures, or investing in new opportunities for professional development. As the SHC/SMCH Office of Compliance and Privacy moves forward into its next era, it will be critical that the unit remains forward-looking, agile, and efficient. The SHC/SMCH Chief Compliance Officer will empower the professionals within the SHC/SMCH Office of Compliance and Privacy to optimize their expertise and collaborate while supporting continuing education and career growth. The SHC/SMCH Chief Compliance Officer will balance encouraging new initiatives and objectives while maintaining the high quality of the office's core responsibilities and roles.

Collaborate and build relationships with partners across Stanford Health Care, Stanford Medicine Children's Health, and Stanford University.

The SHC/SMCH Chief Compliance Officer must build and maintain credibility as a trusted expert and partner across the Stanford Health Care, Stanford Medicine Children's Health, and Stanford University communities. The SHC/SMCH Chief Compliance Officer must maintain strong working relationships with the ACERs, the Stanford University Office of the Chief Risk Officer, Office of the General Counsel, the Chief Audit Executive, Stanford University Chief Compliance Officer, Stanford Medicine Chief Information Officers, Stanford University and Stanford Medicine Chief Information Security Officers, and others on the Stanford senior leadership teams. As a decisive and transparent communicator, the SHC/SMCH Chief Compliance Officer will circulate widely to learn from leaders across Stanford Health Care and Stanford Medicine Children's Health about current and potential concerns, best practices, and opportunities for improvement. The SHC/SMCH Chief Compliance Officer will be tasked with maintaining close and collaborative relationships with leaders within Stanford University's Office of the Chief Risk Officer and School of Medicine to support alignment of policies and procedures in support of risk-balanced approaches that support Stanford's education, clinical, and research missions; these relationships are integral to achieving the strategic mission and goals of Stanford Health Care, Stanford Medicine Children's Health, and Stanford University while identifying, assessing, monitoring, and addressing risk areas. The SHC/SMCH CCO supports clear and open communication between and among compliance and risk leaders across Stanford. In particular, the SHC/SMCH CCO works collaboratively with the SHC/SMCH Senior Vice President for Enterprise Risk Coordination to align risk-related plans and communication between and

among the enterprise risk, compliance, privacy, internal audit, and other related functions across Stanford, supporting clear and coordinated messaging to Stanford senior leaders, ACER members, governing boards, and other leadership forums. The SHC/SMCH Chief Compliance Officer should be welcomed and embraced as a valued colleague and trusted counsel who will work collaboratively to develop solutions when existing or potential risks are identified.

Demonstrate agile leadership and subject expertise to support innovation.

The next SHC/SMCH Chief Compliance Officer must demonstrate astute judgment and leadership agility while supporting great innovation and care in the face of potential risks. Stanford Health Care, Stanford Medicine Children's Health, and Stanford University School of Medicine are strongly dedicated to combining clinical care, research, and education to advance medical knowledge, treatment, and care. With the continued growth of clinical trials and artificial intelligence (AI) innovation, it will be essential for the SHC/SMCH Chief Compliance Officer to be a flexible, engaged, and thoughtful leader. The SHC/SMCH Chief Compliance Officer will be tasked with staying forward-thinking to identify, assess, monitor, and troubleshoot potential non-compliance and risk to pave the way for innovation and nuance without defaulting to a risk-averse stance.

Preserve, promote, and educate to nurture a culture of ethics and compliance.

In conjunction with the other leaders within Stanford Health Care and Stanford Medicine Children's Health, the SHC/SMCH Chief Compliance Officer leads compliance initiatives to prevent, detect, and respond to internal and external risks and conduct enterprise risk assessments, investigations, and mitigations. They will lead and support institutional initiatives to oversee that all compliance, billing integrity, and privacy objectives meet or exceed U.S. Department of Health, Office of Inspector General (OIG), and California Department of Public Health compliance program guidelines and requirements. This includes developing and educating the SHC/SMCH community on standards of conduct, policies, and procedures that support the organization's commitment to compliance.

In addition, the SHC/SMCH Chief Compliance Officer will develop, implement, and assess strategies to increase institutional understanding around compliance through education and training mechanisms. The SHC/SMCH Chief Compliance Officer will be a visible advocate for compliance discussions, considerations, and involvement on multiple levels at Stanford Health Care, Stanford Medicine Children's Health, and Stanford University. In conjunction with supporting other leaders in their understanding of the support and services provided by the SHC/SMCH Office of Compliance and Privacy, such as the hotline, the SHC/SMCH Chief Compliance Officer will tirelessly champion the value and work of the SHC/SMCH Office of Compliance and Privacy.

QUALIFICATIONS AND CHARACTERISTICS

Ideally, the successful candidate will bring most, if not all, of the following professional qualifications, characteristics, skills, experience, and personal qualities:

- Ten years of directly related work experience in health care compliance, privacy, billing integrity, leadership, and management/administration, preferably in an academic medical center of similar size and complexity.
- Strong working knowledge of compliance regulations and laws applicable to hospital and provider settings, including Anti-Kickback Statute, EMTALA, the Stark Law, and Medicare and Medicaid program requirements.
- Substantial experience addressing matters concerning professional fee billing, facility fee billing, and clinical trial billing.
- Strong working knowledge of HIPAA and other applicable privacy laws and regulations and experience in establishing and overseeing compliance with privacy policies.
- Strong interpersonal skills; credibility and effectiveness in interacting with leadership, clinical faculty, regulatory officials, boards, and compliance professionals.
- Effective partnership building that facilitates positive working relationships to achieve desired outcomes.
- Excellent communication skills and an adaptable, cooperative, and persuasive approach.
- Strong project management and facilitation skills.
- Excellent managerial skills and demonstrated experience leading a compliance team; ability to delegate effectively.
- Strong demonstrated experience in developing and creating sustainable operational budgets.
- Bachelor's degree in a work-related discipline/field from an accredited college or university; JD preferred (but will not be practicing law at Stanford); and
- Certification in Healthcare Compliance (CHC) preferred.

COMPENSATION RANGE

Salary Range: \$346,000-457,000

NOMINATIONS, APPLICATIONS, AND INQUIRIES

Stanford Health Care and Stanford Medicine Children's Health are committed to cultural diversity, and it is expected that the successful candidate will further this commitment. The university and its hospitals are affirmative action/equal opportunity employers. Screening of complete applications will begin immediately and continue until the search is completed. Confidential nominations and inquiries are being accepted for the position. All nominations, applications, and inquiries should be directed to Isaacson, Miller website for the search: <https://www.imsearch.com/open-searches/stanford-health-care-and-stanford-medicine-childrens-health/chief-compliance-officer>.

Rebecca Kennedy, Partner (she/her)

Kristin Benoit, Associate (she/her)

Elizabeth Arvanitis, Search Coordinator (she/her)
Isaacson, Miller

Stanford Health Care and Stanford Medicine Children's Health set a high standard for delivering value and an exceptional experience for our patients and families. Candidates for employment and existing employees must adopt and execute C-I-CARE standards for all of patients, families, and towards each other. C-I-CARE is the foundation of Stanford's patient-experience and represents a framework for patient-centered interactions. Simply put, we do what it takes to enable and empower patients and families to focus on health, healing, and recovery.