



**Job Title:** Director of Privacy  
**Department:** Quality  
**Supervisor:** Chief Quality Officer  
**FLSA Status:** Exempt  
**Approved Date:** 6-2021

### **Position Summary**

Works closely with the Chief Quality Officer/Privacy Officer and Compliance Manager to develop, implement, and direct a comprehensive privacy program for Community Health of Central Washington (CHCW) in accordance with HIPAA, other federal and state regulations, and CHCW policies and procedures. The CHCW Privacy Program shall be designed to ensure that CHCW and affiliated entities have appropriate administrative, technical, and physical safeguards to protect (and access) the privacy of protected health information (PHI) and personal information (PI). Responsible for providing leadership and direction over the privacy program, privacy-related committees and privacy initiatives as designated in collaboration with the Chief Quality Officer/Privacy Officer.

**Essential Duties and Responsibilities** include the following. Other duties may be assigned.

1. Builds a strategic and comprehensive privacy program that defines, develops, maintains, and implements policies and procedures that enable consistent, effective privacy practices which minimize risk and ensure the confidentiality of protected health information (PHI); ensure privacy forms, notices, policies, standards and procedures are up to date.
2. Takes a lead role to ensure the organization has and maintains appropriate privacy and confidentiality consents, authorization forms, information notices, materials reflecting current organization, legal practices, and requirements.
3. Oversees, develops, and delivers ongoing privacy training to the workforce.
4. Collaborates with IT Security and Information Services to ensure alignment between security and privacy programs including policies, practices, and investigations.
5. Attends and participates in the Privacy and Information Security Workgroup meetings.
6. Develops metrics and trending reports of privacy matters for use in assessment of privacy compliance and risk analysis.
7. Tracks privacy incidents and develops routine reports for the privacy program.
8. Conducts related ongoing privacy compliance monitoring activities in coordination with other organization's compliance and operational assessment functions.
9. Participates in the development, implementation, and ongoing privacy compliance monitoring of business associates and business associate agreements to ensure all privacy concerns, requirements, and responsibilities are addressed.
10. Establishes and administers a process for receiving, documenting, tracking, investigating, and taking action on all complaints concerning the organization's privacy policies and procedures in

coordination and collaboration with other similar functions, IT Security, Chief Quality Officer/Privacy Officer, and, when necessary, legal counsel.

11. Oversees breach notifications are met in a timely manner and in accordance with HIPAA and applicable state laws.
12. Participates in activities to foster information privacy awareness within UTHSA and related entities and develops training materials and delivers privacy training to members of the workforce.
13. Works with Chief Quality Officer/Privacy Officer and Legal counsel in litigation and administrative matters related to privacy issues to represent UTHSA's interests.
14. Develops strategy to ensure compliance with HIPAA, 42 CFR Part 2, FERPA, and other regulations, as needed.

### **Competencies**

To perform the job successfully, the following competencies should be demonstrated.

**Attendance/Punctuality** - Is consistently at work and on time, as established; ensures work responsibilities are covered when absent; arrives at meetings and appointments on time.

**CHCW Culture** - Treats people with respect; inspires the trust of others; works with integrity and principles; upholds organizational values; follows policies and procedures; supports organization's goals and values; shows respect and sensitivity for cultural differences; follows instructions; responds to management direction; takes responsibility for own actions; keeps commitments; commits to long hours of work when necessary to reach goals; completes tasks on time or notifies appropriate person with an alternate plan; asks for and offers help when needed.

**Communications** - Speaks clearly and persuasively in positive or negative situations; listens and gets clarification; responds well to questions; demonstrates group presentation skills; participates in meetings; writes clearly and informatively; edits work for spelling and grammar; keeps others adequately informed; selects and uses appropriate communication methods.

**Customer Service for Internal and External Customers/Patients** - Manages difficult or emotional customer/patient situations; responds promptly to customer/patient needs; solicits customer/patient feedback to improve service ; responds to requests for service and assistance; meets commitments.

**Job Knowledge** - Competent in required job skills and knowledge; exhibits ability to learn and apply new skills; keeps abreast of current developments; requires minimal supervision; displays understanding of how job relates to others; maintains confidentiality per policy and regulations; fluent in Microsoft Office programs, including Word, Excel, PowerPoint and Outlook and job related software and computers; uses resources effectively; pursues training and development opportunities; adapts to new technologies; keeps technical skills up to date.

**Problem Solving** - Identifies and resolves problems in a timely manner; gathers and analyzes information skillfully; develops alternative solutions; works well in group problem solving situations; uses reason even when dealing with emotional topics; adapts to changes in the work environment; changes approach or method to best fit the situation.

**Planning/Organizing** - Prioritizes and plans work activities; uses time efficiently; plans for additional resources; sets goals and objectives; organizes or schedules other people and their tasks; develops realistic action plans.

**Quality Management** - Looks for ways to improve and promote quality; demonstrates accuracy and thoroughness; applies feedback to improve performance; monitors own work to ensure quality.

**Safety and Security** - Observes safety and security procedures; determines appropriate action beyond guidelines; reports potentially unsafe conditions; uses equipment and materials properly.

**Teamwork** - Exhibits objectivity and openness to others' views; gives and welcomes feedback; establishes and maintains effective relations; exhibits tact and consideration; offers assistance and support to co-workers; works cooperatively in group situations; works actively to resolve conflicts.

### **Qualifications**

To perform this job successfully, an individual must be able to perform each essential duty satisfactorily. The requirements listed below are representative of the knowledge, skill, and/or ability required. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.

### **Education and/or Experience**

Bachelor's degree in Business Administration, Healthcare Administration, Science or related field is required. Graduate-level degree preferred (MPH, MHA, MBA, JD) or equivalent is preferred. Seven (7) years prior healthcare compliance related experience, or related experience is required. Five (5) years of general privacy experience. Certified in Healthcare Policy Compliance (CHPC) preferred.

### **Certificates, Licenses, Registrations**

Current Washington RN license.  
Current driver's license and auto insurance.

### **Physical Demands**

The physical demands described here are representative of those that must be met by an employee to successfully perform the essential functions of this job. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.

While performing the duties of this Job, the employee is frequently required to sit; use hands to finger, handle, or feel and talk or hear. The employee is occasionally required to stand; walk; reach with hands and arms and stoop, kneel, crouch, or crawl. The employee must occasionally lift and/or move up to 10 pounds. Specific vision abilities required by this job include close vision, distance vision, color vision and ability to adjust focus.

### **Work Environment**

The work environment characteristics described here are representative of those an employee encounters while performing the essential functions of this job. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions  
The noise level in the work environment is usually quiet.

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Employee Signature

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Date

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Employee Print Name

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Supervisor Signature

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Date

**CHCW Statement on Diversity, Equity, and Inclusion**

At Community Health of Central Washington, we acknowledge that we work in a system of health care and medical education that perpetuates implicit and explicit bias and barriers, and has condoned inequity and institutionalized racism.

We are committed to dismantling institutionalized racism and addressing these disparities through: acknowledging their presence; developing an equity curriculum; increasing advocacy within our organization, community, and at a national level by elevating voices of marginalized communities; and training patient-centered, culturally sensitive, compassionate providers to provide quality care to all diverse peoples and communities, in Central Washington and beyond.

We value every person, inclusive of their socioeconomic status, race, ethnicity, language, nationality, sex, gender, sexual orientation, spiritual practice, geography, ability, medical condition, or age.