Options for Including Compliance Expectations
in Position Descriptions in OHSU Hospitals and Clinics

Assumptions: Position descriptions for OHSU Hospital and Clinics employees must include duties and responsibilities regarding compliance. Depending upon the employee's position, the needs for compliance may vary. Therefore the resulting language in position descriptions may vary.

A. MINIMUM FOR ALL
1. Reference by language from "Compliance Roles and Responsibilities in OHSU H&C":
Example for non-management position:
        "Performs requirements for Staff Members as outlined in Compliance Roles and Responsibilities in OHSU Hospitals and Clinics (attached)".

Example for management position:
        "Performs requirements for Department Directors/Managers as outlined in Compliance Roles and Responsibilities in OHSU Hospitals and Clinics (attached)".

OR:

2. Include language from "Compliance Roles and Responsibilities in OHSU Hospitals and Clinics" for the appropriate level of responsibility.

B. OPTIONAL ADDITIONS
1. Develop classification specific requirements, particularly for high risk areas when employees have similar job requirements.
Examples:
        "Documents in medical record all patient care services delivered in support of third party bills."
        "Processes billings for hospital and clinic charges in accordance with HCFA, Medicaid, Champus and all commercial and managed care carriers."
        "Assures departmental compliance with all applicable third party payer regulations and contracts."

2. Develop position specific language, particularly for high risk areas when the employee has unique or job-specific compliance requirements.
Examples:
        " Follows Oregon Administrative Rules (OARs) Division 10 and Division 15 regarding workers' compensation and managed care organizations in operation of OHSU WorkComp."
        "Establishes and maintains compliance program for OHSU Hospitals and Clinics in accordance with Department of Health and Human Services Office of Inspector General's "Voluntary Guidelines for Hospital Compliance'".