



## National Chief Compliance Officer

JOB LOCATION: LOS ANGELES, CA

JUNE 2023

### JOB SUMMARY:

**Seoul Medical Group, Inc.** (“SMG”) provides multi-specialty medical services in numerous states across the country, both directly and through certain subsidiaries (the “SMG Subsidiaries”). Both SMG and the SMG Subsidiaries are formed as IPAs or similar entities under state law; and they contract (often on a risk basis) with third-party payors to provide medical services. SMG and the SMG Subsidiaries then subcontract under Participating Provider Agreements to have the services provided by independent physicians or physician groups.

SMG is looking for a national Chief Compliance Officer to oversee SMG’s national compliance program and the compliance programs of the SMG Subsidiaries. The national headquarters of SMG is located in Los Angeles, California. Salary will be commensurate with experience and qualifications.

### QUALIFICATIONS:

The candidate for the SMG National Chief Compliance Officer position must have at least 10 years of experience with health care compliance programs, preferably with large physician practices, with IPAs, or with value-based clinical delivery systems. The candidate must at least have a bachelor’s degree from an accredited college, and preferably have a master’s degree in business administration, health care administration, a juris doctorate, or related education. Certification in Healthcare Compliance (CHC), Healthcare Privacy Compliance (CHPC), Health Care Compliance Association (HCCA) membership, and/or course accreditation from HCCA or similar organizations, is a plus. Government experience with a federal health agency (e.g., CMS, OIG), position as a former federal prosecutor, State Medicaid, or health department official, is preferred.

Familiarity with risk-adjusted reimbursement methodologies is required. While the candidate need not be a certified coder, working knowledge of ICD-10, HCPCS and CPT coding is a must, along with the familiarity and ability to provide oversight of revenue cycle, coding, and billing compliance. Familiarity with physician incentive and compensation programs, use of quality metrics, or related operational and service delivery paradigms is a must. An understanding of how data analytics operate in a risk or value based environment is also essential.

In addition, the candidate must understand the regulatory requirements for effective compliance programs, including an understanding of HIPAA Privacy and Security. This includes not only knowledge of the formal elements of a program – as required by the OIG and other regulatory agencies – but also experience with the successful operation of compliance programs, including such things as: (i) hands on experience in overseeing auditing and monitoring programs; (ii) conducting compliance and related education and training sessions; (iii) running internal compliance investigations; (iv) implementing multi-faceted corrective action plans; (v) reporting to senior management and governing boards; and (vi) conducting and overseeing risk management activities. Prior experience in preparing and submitting voluntary disclosures to government agencies is preferred but not required, as is dealing with governmental audits, evaluations, investigations, or enforcement actions.

The candidate must also have a basic working knowledge of the health care fraud and abuse laws, rules, and regulations, including the Anti-Kickback Law, the Stark Law, the False Claims Act (as related to documentation, coding, and billing), and state rules relating to the corporate practice of medicine.

Finally, the candidate must have excellent communication and analytical skills, and be able to work in a complex environment, interacting and coordinating with outside consultants, internal staff and management, physicians, and outside compliance counsel. The candidate must be able to work smoothly and in a supportive way with other SMG compliance professionals, coordinating the operation of SMG's national compliance program and the integration of the compliance programs of the various SMG Subsidiaries.

## **DUTIES:**

The National Chief Compliance Officer (the "CCO") is a full-time SMG employee that reports directly to the SMG CEO and has direct access to the SMG Board of Directors regarding any compliance matters involving SMG or the SMG Subsidiaries at any time. The CCO oversees the operations not only of the national SMG compliance program, but also the programs of all of the SMG Subsidiaries. In this regard, the CCO is responsible for the overall effective operations of the compliance program and coordinating with and overseeing the SMG Subsidiary compliance officers.

The CCO will thus oversee SMG compliance staff, as well as the compliance officers of all SMG Subsidiaries. The CCO will be tasked with ensuring that the auditing, monitoring, document review, educational, reporting, and evaluation aspects of the compliance program are carried out. The CCO will be available to all personnel to report possible illegal or unethical conduct and will investigate and resolve such reports, implementing corrective actions as necessary and reporting at least quarterly or more often as needed to the SMG Board of Directors.

Some of the CCO's specific responsibilities include, but are not necessarily limited to, the following:

- Developing and implementing specific compliance policies, procedures, and practices designed to ensure compliance with Federal and State health care program requirements, health plan contracts, and accreditation requirements;
- Revising the compliance policies, procedures, and practices per changing statutes and regulations;
- Ensuring that appropriate auditing and monitoring is being conducted;
- Ensuring that all staff and personnel are receiving appropriate compliance education and training;
- Responding to compliance questions and concerns raised by staff;
- Enforcing a system to solicit, evaluate, and respond to complaints, including overseeing the operation of the compliance hotline and maintaining a log of all compliance hotline complaints;
- Ensuring that all personnel are checked against federal and state exclusion lists consistent with the compliance policies, procedures, and practices;
- Coordinating the response to any governmental requests, subpoenas, inquiries, or investigations;
- Compiling each year a comprehensive Compliance Risk Assessment and Work Plan (composed in part of an aggregation of those prepared by each SMG Subsidiary compliance officer) for presentation to and review and approval by the SMG Board of Directors;
- Conducting, overseeing, or coordinating internal compliance inquiries or investigations;
- Developing and monitoring a system for handling violations of applicable compliance policies, procedures, and practices, including the development and implementation of corrective action plans; and
- Chairing the SMG National Compliance Committee, which meets at least quarterly or more often as needed.

The CCO is not, and is not subordinate to, the Chief Legal Officer/General Counsel or the Chief Financial Officer of SMG. The CCO will not have any responsibilities that involve acting in any capacity as legal counsel or supervising legal counsel functions for SMG or the SMG Subsidiaries.

**TO APPLY:** [ncolangelo@sheppardmullin.com](mailto:ncolangelo@sheppardmullin.com)

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