

Success at Every Level: a Career Ladder for Privacy Officers

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by Gwen Hughes, RHIA

Considering a career in privacy? AHIMA's Career Progression Ladder for Privacy Officers reveals the education, skills, and support you need to succeed.

The HIPAA privacy rule requires that covered entities designate a privacy official responsible for the development and implementation of privacy-related policies and procedures. HIM professionals are in a unique position to assume the privacy officer role because of their comprehensive understanding of how patient health information is requested, used, and disclosed. Additionally, HIM professionals are committed to protecting patient health information while ensuring that information is readily available to legitimate requesters.

With this in mind, AHIMA developed the Career Progression Ladder for Privacy Officers. This ladder provides information about privacy officer career options and the professional development steps required to reach each level. As you examine this career ladder, it is important to note that AHIMA strongly encourages hiring RHITs and RHIAs for privacy officer roles.

Keep in mind that there are many ways to climb the privacy officer career ladder. While some people may prepare for a privacy officer role through the traditional HIM or patient accounts roles illustrated on this ladder, others may obtain the necessary knowledge, skills, and experience through roles in education, research, or information systems. Finally, your place on the career ladder is determined by what you want to accomplish—there is no one “right” rung. Reaching the next rung is up to you.

Career Progression Ladder for Privacy Officers

Level One: Clerk

Educational preparation: High school diploma or equivalent; successful completion of a health record clerk program or equivalent education or on-the-job training program

Privacy-related knowledge needed:

- Medical terminology
- Health record content
- Basic understanding of patients' rights to privacy and facility's responsibilities for ensuring privacy

Skills needed:

- Ability to apply privacy concepts, policies, and procedures to requests for protected health information
- Ability to recognize potential risks and situations in which supervisor should be consulted

Duties:

- Evaluates authorizations, court orders, and subpoenas for validity
- Applies minimum necessary standard or criteria to requests
- Evaluates requested content to determine if any of the information should be withheld from the requester
- Discloses information according to federal and state law and facility policy
- Submits certifications and disclosures made in response to a court order or subpoena to supervisor for approval

- Denies access or disclosure in accordance with policies and procedures
- Consults supervisor with questions or areas of concern

Salary data: None available

Job titles: Health information disclosure coordinator, health information disclosure clerk, release of information clerk, release of information coordinator

Where to look for jobs: Positions most common in large physician practices and hospitals; can be found in either patient account or health information management departments; can also be found in any healthcare provider or third-party payer setting

Level Two: Supervisor

Educational preparation: Successful completion of vocational program in HIM or a closely related field with courses that address medical terminology, health record content, and legal aspects of health records; RHIT certification preferred

Privacy-related knowledge needed:

- Medical terminology
- Health record content
- Federal and state laws relative to requesting, using, and disclosing health information

Skills needed:

- Ability to explain privacy policies and procedures to staff and requesters of information
- Ability to lead staff effectively
- Ability to monitor privacy-related compliance with federal and state law and facility policy
- Ability to deny access to individuals, law enforcement, attorneys, members of the work force, physicians, and business associates in a constructive manner

Duties:

- Trains clerks to disclose health information in accordance with federal and state law and facility policy
- Trains clerks to differentiate between valid and invalid authorizations, court orders, and subpoenas
- Trains clerks to apply minimum necessary standards or criteria
- Trains staff to identify information that should be withheld from access or disclosures
- Monitors disclosures for compliance with federal and state laws and facility policies
- Checks and approves certifications and disclosures made in response to subpoenas and court orders
- Documents and reports to privacy officers any incidents wherein disclosures did not comply with laws, regulations, policies, and procedures
- Serves as a resource to clerks who have questions about applying laws, regulations, policies, and procedures

Salary data: None available

Job titles: Supervisor, HIM; supervisor, medical records; supervisor, patient accounts; supervisor, copy service; supervisor of compliance and regulatory management

Where to look for jobs: Positions most common in large provider settings, such as physician practices and hospitals; can be found in either patient account or HIM departments; can also be found in any third-party payer setting

Level Three: Manager or assistant director

Educational preparation: RHIT certification or an associate's degree in accounting (or related field) with courses that address medical terminology, health record content, and legal aspects of health records

Privacy-related knowledge needed:

- Medical terminology
- Health record content in both paper-based and computer-based systems
- Information privacy laws
- Ethical privacy standards
- Access, use, and disclosure of health information
- Access control technologies
- Presentation techniques

Skills needed:

- Ability to simplify and teach others privacy-related concepts, federal and state law, and facility policy related to privacy
- Ability to lead staff effectively
- Ability to write policies and procedures that are accurate and understandable
- Ability to work with others to ensure compliance
- Ability to establish and implement logical systems that meet federal, state, or facility privacy standards
- Ability to deny access to any requester in a constructive manner

Duties:

- Manages day-to-day operations in HIM, patient accounts, or equivalent department in a health plan
- Authors department-level or organization-wide policies and procedures
- Educates and trains members of the organization's work force
- Establishes systems as needed to implement compliance with federal and state laws and regulations, standards of practice, organizational policy, and departmental goals and objectives
- Works with other departments to monitor compliance with laws, regulations, standards, policies, and procedures
- Designs and takes corrective action when indicated by monitoring
- Reports the results of performance monitoring activities to appropriate organizational authority

Salary data: \$30,000-\$75,000

Job titles: Health information manager; assistant director, HIM; patient accounts manager; assistant director, patient accounts; compliance manager

Where to look for jobs: Provider organizations including hospitals, nursing homes, physician practices, and home health organizations; health plans; organizations that contract with providers to provide release of information or other patient information-related services

Level Four: Director

Educational preparation: RHIA certification or a bachelor's degree and RHIT certification

Privacy-related knowledge needed: Same as above

Skills needed: Same as above

Duties:

- Directs HIM, patient accounts, business office, or equivalent function in a health plan
- Authors organizational and department policies and procedures
- Educates administration, members of the work force, the medical staff, and others as to laws, regulations, standards, policies, and procedures
- Works with administration to acquire the resources needed to implement organizational initiatives
- Works with others to ensure organizational and departmental compliance with laws, regulations, standards, policies, and procedures

Salary data: \$35,000-\$80,000

Job titles: Director, HIM; director, patient accounts; director of corporate compliance

Where to look for jobs: Provider organizations, health plans, and organizations that contract with those organizations to provide health information-related services

Level Five: Manager or director of one or more departments with the responsibilities of a privacy officer

Educational preparation: RHIA certification or a bachelor's degree and RHIT certification; AHIMA certification as a privacy officer

Privacy-related knowledge needed: Same as above, plus:

- Ethical and accreditation standards
- Adult learning
- Gap analysis
- Risk management analysis
- Compliance
- Accepted physical and security systems
- Auditing systems
- Storage, retention, and destruction of health information

Skills needed: Same as above, plus:

- Ability to write and speak persuasively
- Ability to administer an appropriate organizational infrastructure for privacy
- Ability to coordinate facilitywide projects
- Ability to update, coordinate, and implement privacy-related policies and procedures facility wide

Duties:

- Directs the HIM, patient accounts, or other departments or services
- Works with other departments to develop and implement privacy-related policies and procedures that adhere to federal and state laws and regulations
- Fosters privacy awareness
- Serves on or as a liaison to the organization's institutional review board or privacy committee
- Works with the security officer to ensure alignment between privacy and security practices
- Represents the organization's information privacy interests to internal and external groups

Salary data: \$50,000-\$100,000

Job titles: Director, HIM; director, patient accounts; director, information services; director, corporate compliance; chief information officer; privacy officer

Where to look for jobs: Provider organizations, health plans, and organizations that contract with those organizations to provide health information services

Level Six: Facility privacy officer (single facility)

Educational preparation: AHIMA certification as a privacy officer

Privacy-related knowledge needed: Same as above

Skills needed: Same as above, plus:

- Ability to simplify and teach others privacy-related concepts, federal and state law, ethical standards of practice, and facility policy related to privacy
- Ability to establish and administer an appropriate organizational infrastructure for privacy

Duties: Same as above, plus:

- Manages the development and implementation of privacy-related policies and procedures that adhere to federal and state laws and regulations
- Fosters privacy awareness
- Serves on or as a liaison to the organization's institutional review board or privacy committee
- Works with the security officer to ensure alignment between privacy and security practices
- Represents the organization's information privacy interests to internal and external groups

Salary data: \$50,000-\$100,000

Job title: Privacy officer

Where to look for jobs: Provider, health plan, and business associate enterprises

Level Seven: Enterprise privacy officer (privacy officer for more than one facility)

Educational preparation: AHIMA certification as privacy officer

Privacy-related knowledge needed: Same as above

Skills needed: Same as above, plus:

- Ability to lead effectively; skills must be particularly strong due to breadth of position and absence of direct- line authority in most cases
- Ability to understand the unique operational aspects of each facility within the enterprise
- Ability to coordinate enterprise-wide projects

Duties: Same as above, plus:

- Develops and implements privacy-related policies and procedures that adhere to federal and state laws and regulations among numerous organizations in an enterprise
- Fosters privacy awareness
- Serves on or as a liaison to the organization's institutional review board or privacy committee
- Works with the security officer to ensure alignment between privacy and security practices
- Represents the organization's information privacy interests to internal and external groups

Salary data: \$70,000-\$125,000

Job title: Privacy officer

Where to look for jobs: Large provider, health plan, and business associate enterprises

Level Eight: Chief privacy officer (enterprise privacy officer to whom other privacy officials report)

Educational preparation: AHIMA certification as a privacy and security officer; master's or doctorate degree in HIM, information systems, law, or a related field

Privacy-related knowledge needed: Same as above, plus:

- Strategic planning
- Enterprise information systems

- Knowledge management

Skills needed: Same as above, plus:

- Ability to manage enterprise-wide projects

Duties:

- Develops and implements privacy-related policies and procedures that adhere to federal and state laws and regulations among numerous organizations in an enterprise through other privacy officers
- Fosters privacy awareness
- Serves on or as a liaison to the enterprise's institutional review board
- Ensures alignment between enterprise privacy and security practices
- Represents the organization's information privacy interests to internal and external groups

Salary data: \$125,000 or more

Job titles: Chief privacy officer; vice president, privacy; vice president, privacy and security; vice president, information services

Where to look for jobs: The largest provider, health plan, and business associate enterprises u

Help Along the Way

AHIMA provides products and services to assist HIM professionals as they ascend the privacy officer career ladder. Below is a breakdown of support services by career level. For more information, go to www.ahima.org and click on "Professional Development."

Level One

- Health Information Management Technology textbook
- Health Information Privacy, Confidentiality, and Security: Principles and Practice textbook (available summer 2003)
- Practice briefs
- *Journal of AHIMA*
- *In Confidence*
- Communities of Practice
- Web-based continuing education course: Building the Foundation for the Privacy Initiative

Level Two

Same as above, plus:

- Web-based continuing education course: How to Achieve HIPAA Compliance
- FORE Library: HIM Body of Knowledge
- Getting Practical with Privacy and Security seminars
- Privacy institutes
- AHIMA National Convention

Level Three

Same as above, plus:

- Health Information Management Concepts, Principles and Practice textbook
- Privacy specialty advancement program

Level Four

Same as above

Level Five

Same as above, plus:

- Certification in Healthcare Privacy (CHP)
- Certification in Healthcare Privacy and Security (CHPS)
- Certification in Healthcare Security (CHS)

Levels Six, Seven, and Eight

Same as above

References

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