



**Title: Vice President, Legal Policy, Governance, and Compliance**

**Reports to:** Chief Executive Officer

**FLSA Status:** Exempt, Full Time

**Supervisory Responsibility:** Oversees policy, governance, and compliance staff as appropriate

**Location:** Remote (U.S.)

**Starting Salary Range:** \$210,000 - \$250,000 Depending on Experience

**POSITION SUMMARY:**

The Vice President, Legal Policy, Governance, and Compliance is responsible for leading the legal and regulatory analysis, policy development, governance, and compliance activities supporting the Trusted Exchange Framework and Common Agreement (TEFCA) and other programs of The Sequoia Project. This role applies substantial legal expertise to interpret federal and state laws, regulations, contractual obligations, and governance requirements and translates them into clear, enforceable policy frameworks, governance structures, and compliance mechanisms.

Serving as a senior legal-policy advisor to executive leadership, this position leads policy development efforts, and provides authoritative interpretation of the TEFCA Common Agreement, Standard Operating Procedures, and related legal and regulatory requirements. The role works closely with General Counsel but is expected to independently perform sophisticated legal and policy analysis, draft governance documents and policy instruments, assess legal and regulatory risk, and develop recommendations that shape nationwide health information exchange policy.

This position is distinct from operational functions and focuses on legal and regulatory interpretation, policy development, governance execution, and compliance oversight in coordination with operational teams.

This position operates in a collaborative, mission-driven environment supporting nationwide health information exchange through TEFCA and other programs. The role works closely with governance bodies, executive leadership, General Counsel, and internal teams to ensure policies are legally sound, effectively developed, maintained, and enforced.



### **What is The Sequoia Project?**

The Sequoia Project is a non-profit with a public service mission to lead in an interoperable health information sharing ecosystem to improve the health and welfare of people in the United States. The Trust Framework Team supports public and private sector-led trust framework programs by providing leadership and support for policy, governance, technical, operational, and stakeholder engagement efforts.

### **FUNCTIONAL RESPONSIBILITIES:**

#### **Legal Policy Leadership and Strategy**

- Direct the development, refinement, and lifecycle management of policies, procedures, and governance artifacts for TEFCA and other programs.
- Interpret the TEFCA Common Agreement and associated materials to ensure consistent and authoritative application.
- Conduct in-depth legal and regulatory analysis related to HIPAA, HITECH, information blocking, privacy, security, and other applicable laws.
- Monitor federal and state policy and regulatory developments and assess implications for TEFCA and related interoperability initiatives.
- Provide strategic recommendations to executive leadership on policy direction, governance priorities, and areas of legal and regulatory risk.

#### **TEFCA Governance and Governing Bodies**

- Establish, support, and oversee governance structures required under TEFCA, including committees, workgroups, and decision-making bodies.
- Develop and maintain charters, governance processes, and decision frameworks to ensure transparency, consistency, and accountability.
- Provide legal and policy guidance to governing bodies to enable informed and timely decision-making.
- Ensure governance processes align with the Common Agreement and are consistently applied across the network.

#### **Compliance and Oversight**

- Lead the development and oversight of compliance frameworks supporting adherence to TEFCA policies and requirements.
- Define and maintain policy interpretation processes to ensure consistent application across QHINs and related entities.



- Support governance processes related to compliance determinations, issue escalation, dispute resolution, and policy enforcement.
- Partner with internal teams to ensure alignment between policy requirements and compliance monitoring activities.

### **Legal and Regulatory Alignment**

- Draft and interpret governance agreements, policies, enforcement mechanisms, and compliance determinations.
- Evaluate legal implications of proposed policy changes and provide formal recommendations to executive leadership and governance bodies.
- Develop legal position papers, issue briefs, and regulatory comments.
- Work closely with General Counsel to ensure policies are legally sound, enforceable, and aligned with risk management strategies.
- Analyze contractual and regulatory obligations applicable to QHINs and other participants.

### **Governance for Other Programs**

- Direct the development and maintenance of legal, policy, and governance frameworks for additional programs as appropriate.
- Ensure alignment and consistency of governance approaches across programs where applicable.
- Establish governance processes that are transparent, enforceable, and aligned with program objectives and contractual requirements.

### **KNOWLEDGE, SKILLS, AND ABILITIES:**

- Expert knowledge of healthcare law, HIPAA, HITECH, information blocking regulations, and federal health policy.
- Deep familiarity with TEFCA, the Common Agreement, and governance models supporting trust frameworks preferred.
- Familiarity with applicable interoperability standards (e.g., FHIR, USCDI) desired.
- Ability to translate complex legal, contractual, and regulatory requirements into clear, enforceable policy and governance frameworks.
- Exceptional analysis, policy writing, issue-spotting, and statutory interpretation skills.
- Strong written and verbal communication skills, with the ability to support executive and governance-level decision-making.



- Strategic thinker with the ability to balance policy intent, regulatory requirements, and practical implementation considerations.

#### **EDUCATION, TRAINING, AND EXPERIENCE**

- Extensive legal background in healthcare is required.
- 12+ years of legal, regulatory, policy, compliance, or health IT interoperability experience.
- Demonstrated experience working with national interoperability frameworks, including TEFCA, health information networks, or similar trust frameworks.
- Extensive experience drafting and interpreting contracts, governance documents, and policies.
- Proven ability to lead complex policy, governance, and compliance initiatives in a public-private environment.

#### **PHYSICAL AND MENTAL REQUIREMENTS:**

- Ability to work on a computer for extended periods of time to include typing and working on a computer monitor.
- Ability to stand or sit for extended periods of time.
- Extended working hours and travel may be necessary (~10%).
- Occasional lifting of 15 to 20 lbs.

#### **WORK AUTHORIZATION REQUIREMENTS:**

Applicants must be currently authorized to work in the United States on a full-time basis. The Sequoia Project does not provide visa sponsorship or facilitate employment-based immigration processes (e.g., H-1B, OPT, CPT, or other work visas). Candidates must have valid work authorization that does not require employer sponsorship, either now or in the future.

#### **EQUAL EMPLOYMENT OPPORTUNITY:**

*“All qualified applicants will receive consideration for employment without regard to race, color, religious creed, national origin, ancestry, citizenship status, age, sex or gender (including pregnancy, childbirth and related medical conditions), gender identity or expression (including transgender status), sexual orientation, marital status, military service and veteran status, physical or mental disability, protected medical condition as defined by applicable state or local law, genetic information, or any other characteristic protected by applicable federal, state, or local laws and ordinances.”*