



What is a “Corporate Compliance” Program?

A corporate compliance program is generally defined as a formal program specifying an organization's policies, procedures, and actions within a process to help prevent and detect violations of laws and regulations. It goes beyond a corporate code-of-conduct since it is an operational program, not simply a code of expected ethical behavior. Clearly, a code-of-conduct is an important component of a compliance program and ethics remains the heart and soul of all compliance programs. However, a comprehensive program goes further by applying the code to the specific risks of an organization and integrating measures to address those risks.

What is included in our County Compliance Program?

Our Program is an integrated approach that focuses on legal as well as internal compliance to mitigate the risks of fraud and abuse, as well as to reach strategic, operational, and financial reporting objectives. Our Plan looks to bring all of our organization's compliance efforts together, helping to divert disasters, meet quality assurance objectives, and improve performance where needed. Our Program consists of Eight Core Elements:

1. Corporate Compliance Officer/Compliance Committee*
2. Written policies and procedures
3. Documented disciplinary procedures
4. Training for staff and governing board(s)
5. Routine identification of compliance risk areas
6. System/steps for corrective action
7. Whistleblower/non-retaliation protections
8. Confidential reporting.

The **County Compliance Committee consists of the Corporate Compliance Officer, Commissioner of Social Services, Commissioner of Mental Health Services, Commissioner of Personnel, Director of Public Health, Director of Information Technology Services, Director of Finance, and the County Attorney.*

What considerations can be used as a checklist to ensure that our compliance plan is effective?

- **Understand the Scope:** Identify all regulatory and internal compliance needs and efforts to challenge if organizational responsibilities are properly aligned. This should not be a “one and done” step, but rather performed periodically as regulatory landscapes and operational environments change.
- **Conduct a Risk Assessment:** Identify risks, probabilities, and the significance in terms of both qualitative and quantitative measures. Consider scenarios from a cause-and-effect standpoint.
- **Align Controls:** Ensure policies, procedures, and general rules of practice are in place to help identify, minimize or eliminate uncertain events that might negatively impact resources, operations, or outcomes.
- **Assess On-Going Compliance:** Build monitoring and internal reviews into the compliance program to help ensure controls are operating effectively, and seek to identify the most-efficient alignment of these responsibilities.

- **Train, Educate, and Communicate:** Deliver periodic targeted training throughout the organization. Keep in mind that everyone needs to know the “why” and “how” of the county compliance program and to understand his or her role. Also take steps to expand education and outreach efforts to include external partners, customers, vendors, and other stakeholder groups so that they are aware of the County’s commitment.
- **Measure, Report, and Manage:** Develop a reporting mechanism to keep management groups and the governing Board aware of compliance measures, trends and developments. Consider short- and long-term goals of the organization by routinely reviewing the reliability of the management tools and measures intended to help minimize risk and maximize successful results.

What is your role?

- ✓ Read the County Compliance Plan
- ✓ Attend compliance training
- ✓ Report anything that doesn’t seem quite right
- ✓ Ask questions if you have them.

Whom do I contact if I have questions or need guidance?

No set of policies or procedures can address every decision we make in our daily activities. If you have a question about the right course of conduct, please contact your supervisor, manager or department head. You may also make a report to the County Administrator, or contact:

County Compliance Officer
 Paula E.F. Younger
 Deputy County Administrator
 Department of County Administration
 125 East Court Street, 3rd Floor
 Ithaca, NY 14850
 607–274–5551

County Compliance Confidential Helpline—877–348–1396

The Confidential Compliance Helpline is equipped to handle reports from both identified and anonymous callers regarding any known or suspected violations of laws, regulations, or policies related to waste, fraud, or abuse of County funds and resources.



References:

- Fraud Enforcement and Recovery Act
- National Focus on Medicaid Funding-Deficit Reduction Action
- NYS Office of the Medicaid Inspector General (<http://omig.ny.gov>)
- NYS OMIG Compliance Alert: Self-Assessment Tool (<http://www.omig.ny.gov/data/content/view/215/299/>)
- New York State False Claims Act (NYSFCA)
- Title 18 NYCRR Part 521.3(a)