



## TOMPKINS COUNTY COMPLIANCE PROGRAM

Fact Sheet series—Issue No. 1 (Revised 2018)

*Think Compliance First!*

### What's all this Talk about Compliance?

Compliance requirements are nothing new. For example, we have “Workplace Right-to-Know” requirements to ensure health and safety standards in our work environments. However, *how we show accountability* to these standards is the current challenge for local governments. Federal and State funding agreements have grown in the last decade to expand risk management for fraud and abuse, causing local governments to look more closely at how they respond to compliance requirements and to expect the same from its vendors and grant sub-recipients. The increased need for transparency in our daily operations, paired with the need to minimize risk, made it necessary for us to review current County practices and then develop an in-house framework that helps to control, detect, and protect against waste, fraud, and abuse. The Tompkins County Compliance Program was formally adopted by the County Legislature in the summer of 2011.

### What is included in our County Compliance Program?

Our Program mission is to encourage a strong and consistent culture of compliance throughout County government by conducting a proactive County-wide agenda and integrating methods that support all areas of County operations. The Program aims to show transparency and to improve monitoring systems and internal controls that identify and reduce risk. Our County Compliance Program includes the following eight 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 of suspected compliance violations.

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

### How does an Effective Compliance Program Benefit Our Organization?

- Helps ensure that leadership, employees, operational structures and practices, including technology, are working in accord to manage risk.
- Provides a standard for reducing the likelihood of improper or unethical conduct.
- Provides a methodology that encourages employees to actively identify and report potential problems.
- Improves the ability to quickly and accurately respond to operational compliance concerns.
- Creates a proactive (rather than reactive) approach to problem-solving that can potentially save time and resources.

### What is the Role of County Staff?

Our County Compliance Program represents a corporate philosophy and strategy for ensuring quality operations that meet various regulatory requirements. Demonstrating compliance is not a one-time event; it is an ongoing responsibility of every County employee. Here's what you can do:

1. Review the Compliance Program Document and the information provided on the Compliance Program Web Page. (Look for the link found at the lower right corner of the County home page.)
2. Attend annual County Compliance Program training in your department.
3. Stay up-to-date on compliance requirements specific to your department operations.
4. Conduct routine risk assessments of department procedures and practices, seeking ways to minimize vulnerability.
5. Report anything that doesn't seem quite right.
6. Refuse to participate in any wrongful course of action that violates federal, state, or local laws, and regulations.

### **How to Report a Compliance Violation?**

Any employee who witnesses, learns of, or is asked to participate in any activities that are potentially in violation of federal regulations, state or local laws, or policy should contact his or her Supervisor or Department Head.

Confidential Reporting of a suspected compliance violation may be done by either:

- Filing a report in person at the Department of County Administration, Old Jail Building, 3rd floor;
- Calling the toll-free, confidential HelpLine at **877-348-1396**; or
- Mailing information to the County Compliance Program Coordinator, Department of County Administration, 125 East Court Street, 3rd Floor, Ithaca, NY 14850.

The County maintains a Whistleblower Policy (Administrative Policy 11-45) to protect from retaliation officers and employees who, in good faith, have reported a concern about improper or illegal actions. The identity of County employees who report suspected compliance violations will be safeguarded to the fullest extent possible.

### **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 work activities. If you have a question about the right course of conduct, please contact your supervisor, manager or department head. You may also contact our **County Compliance Program Coordinator**:

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Compliance Program Coordinator  
Department of County Administration  
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Ithaca, NY 14850  
607-274-5549