

2017 Compliance Program Progress Report

Year At-a-Glance

In 2017, a **new Compliance Program Coordinator** was hired to support ongoing research and implementation of the Program. The **Title VI Program** has continued to be expanded, including the establishment of a **Public Participation Toolkit** and the development of **Website Accessibility** trainings for appropriate staff. In addition, the Compliance Program has been facilitating the partnership with the Northeast ADA Center at Cornell University to develop and implement a **Reasonable Accommodation Policy**. The ITS Department has rolled out several infrastructure and software improvements. Looking ahead to 2018, ITS will continue to improve the County's information security posture and the Compliance Program will continue to develop the Reasonable Accommodation Policy and outreach plan for staff, as well as continue to update the Administrative Policy Manual.

Key Accomplishments

Compliance Program Coordinator position re-filled. A new full-time Compliance Program Coordinator was hired in the Administration Department to support ongoing research, planning, and implementation of the County Compliance Program. Reporting directly to the County Compliance Officer, the Compliance Program Coordinator's responsibilities include researching state and federal regulations, preparing training materials, helping to facilitate the policy development process, and processing compliance hotline submissions and Title VI complaints.

Since starting in August, the Compliance Program Coordinator has

- Coordinated and co-led web-accessibility trainings for web-content developers and Title VI Coordinators
- Helped coordinate and facilitate the meetings and work of the Internal ADA Accommodation Workgroup and partnership with Northeast ADA Center at Cornell University
- Developed a draft ADA Accommodation Policy and began facilitating the policy development process
- Integrated new updates into the County's annual compliance training materials
- Scheduled and conducted annual compliance training with 17 County departments

Improved information infrastructure, software and language. ITS rolled out several physical infrastructure and enterprise software improvements that enhance stability and security to county operations. ITS has implemented changes to improve the County's security posture due to the ever increasing levels of cyber-attacks. Some primary examples include tools that automatically scan for logins from suspicious locations and for emails containing sensitive data to be appropriately and safely transmitted. ITS also enlarged the use of MFA (multi-factor authentication) for Tompkins County employees, to ensure their user accounts remain secure. The ITS department staff also developed and deployed information security language for contracts and new account management processes, improving consistency across County departments.

Tompkins County Title VI Program

Public Participation Toolkit. This Public Participation Toolkit is a resource guide to help County Departments engage with the public about important projects and decisions. Effective public involvement ensures better decisions that more effectively respond to the needs and priorities of the community, engages the broader diversity of the community—especially people who have not been engaged in the past and increases public understanding of and support for public policies and programs. The toolkit is an exercise to think through appropriate levels of public engagement, methods for engagement, and stakeholders that should be included.

Website Accessibility Initiative. The County's website plays a vital role in providing both information and services to the general public, including people with disabilities who may use assistive technology to access online materials.

In May 2016, the Department of Justice filed a supplemental advance notice of proposed rulemaking regarding guidelines on web accessibility, specifically recommending Web Content Accessibility Guidelines (WCAG) 2.0 AA, which will be required by January 2018. To anticipate these new standards and in partnership with the ITS Department, the Compliance Program delivered website accessibility training for County web content editors and Title VI Department Coordinators to ensure web accessibility compliance.

Interpretation/Language Requests. As part of ongoing performance monitoring of the County's Title VI Program, the Compliance Program tracks interpretation and translation services to better plan for language assistance efforts in the future. The total number of interpretation and translation services in 2017 was 129 and cost \$21,661.88. In 2016, there were 124 of these services and cost \$20,870.51.

Issues and Opportunities for 2018

Strengthening information security. In the coming year, ITS will continue strengthening information security and also provide improved security training across county departments. This training will help County employees to recognize cyber-security weaknesses, as well as phishing and malware techniques that endanger user accounts and County data. ITS will also be engaging with an external security assessment team to provide a third party risk assessment. The results of this engagement will enable County management to review current IT assets and policies, and propose suggestions for areas of improvement or investment to find the best balance of risk to asset ratio. In the coming year additional software will be provided to the Deputy ITS Director and the Information Security Compliance Officer to improve compliance reporting and the FOIL process. ITS will also continue to work with departments to develop improved centralized processes, such as a centralized repository of employees training records. These efforts not only replace individual departmental costs, but standardize how the records are collected and allow for a single solution for records keeping and audit purposes.

ADA/Reasonable Accommodations for County employees. Under Title I of the ADA, when an employee requests an accommodation, or the need for an accommodation becomes obvious, employers have a duty to engage in an "Interactive Process" with the employee. Through this interactive process, an employer and employee work together to assess whether a particular disability can be reasonably accommodated. The Compliance Program is facilitating the partnership with the Northeast ADA Center at Cornell University and a Tompkins County Workgroup to develop an ADA/Reasonable Accommodations Policy, as well as a Procedure Manual. This partnership will also work to develop an education and outreach plan of the policy into 2018.

Administrative Policy Manual Updates. Many of the policies in the Administrative Policy Manual are due to be reviewed. The compliance program will continue working with the appropriate departments to begin the administrative review and amendment process.

This report prepared and submitted by

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