



COUNTY COMPLIANCE PROGRAM

Quality. Integrity. Transparency.

Revised September 2012

(Adopted by the Tompkins County Legislature August 2, 2011)

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I. COMPLIANCE PROGRAM OVERVIEW

A formal corporate compliance program affirms an organization’s principles, practices, and structure to ensure its compliance with all applicable laws, rules, and regulations; it also specifies the process used to prevent and detect any violations. This ongoing, proactive program demonstrates how the organization will operate in a fully legal and ethical manner, and how its code of conduct will be applied to address specific organizational risks. **Tompkins County’s Compliance Program** integrates legal and internal compliance efforts from throughout county government to meet organizational objectives, mitigate risk, assure quality, and improve our performance. Our Program addresses such factors as Compliance Program oversight; related policies, procedures, and training; how areas of risk will be identified, and any problems reported, and corrected, as needed.

A. Policy

It is the policy of Tompkins County to comply with all applicable federal, state, and local laws and regulations and payor requirements. It is also the County’s policy to adhere to its adopted Code of Ethics, which is the County’s code of conduct.

B. Code of Ethics

The County believes that rules of ethical conduct are essential to ensure that public officers and employees observe a high degree of moral conduct. Accordingly, the County adopted a Code of Ethics, which sets forth specific rules of ethical conduct that all county officers and employees are required to follow (see *The Administrative Manual: The Policies and Procedures of Tompkins County Government*, Policy 01-29). The County also has an Ethics Advisory Board that provides ethics advice, reviews ethics complaints against County officers and employees, and oversees compliance with the Code of Ethics. The Code of Ethics and the Ethics Advisory Board help prevent fraud and abuse and are an important part of the County's overall Compliance Program.

TOMPKINS COUNTY MISSION STATEMENT

The mission of the Tompkins County Legislature is to collectively meet the needs of our residents and communities and to realize the Legislature’s articulated vision.

County government will perform those functions not provided as well by individuals, the private sector, other levels of government, or the not-for-profit sector.

County activities will be designed to protect and enhance the lives of the County's diverse residents and communities in ways that are compassionate, ethical, and creative within the limits of what residents financially support.

C. Commitment

We have always been and remain committed to our responsibility to conduct our business affairs with integrity based on sound ethical and moral standards. We hold our employees and agents to these same standards.

The County is committed to maintaining and measuring the effectiveness of our Compliance policies and standards through monitoring and reviewing systems reasonably designed to detect noncompliance by its employees and agents. We shall require the performance of regular, periodic compliance reviews by internal and/or external reviewers

who have expertise in federal and state health-care statutes, regulations, and health-care program requirements.

D. Responsibility

Each employee and agent will acknowledge his or her responsibility to report any suspected or known instances of noncompliance to his or her immediate supervisor, the County Administrator, the Compliance Officer, or a member of the Compliance Committee (see II.B.). Reports may be made anonymously without fear of retaliation or retribution. Failure to report known noncompliance or making reports that are not in good faith will be grounds for disciplinary action, up to and including termination.

E. Policies and Procedures

The County will communicate its compliance standards and policies through required training for all employees and agents. We are committed to these efforts through distribution of this Compliance Policy and our Code of Ethics (See *The Administrative Manual: The Policies and Procedures of Tompkins County Government*, Policy #01-29/Standards of Conduct).

F. Enforcement

This Compliance Policy will be enforced consistently through appropriate disciplinary mechanisms including, if appropriate, discipline of responsible individuals for failure to detect and/or report noncompliance.

G. Agency Response

Detected noncompliance, through any mechanism, (e.g., compliance review procedures, confidential reporting, etc.) will receive an expedient response. We are dedicated to the resolution of such matters and will take all reasonable steps to prevent further similar violations, including any necessary modifications to the Program.

H. Due Diligence

The County will, at all times, exercise due diligence in regard to exclusion screenings (see page 10), background checks, and professional license investigations for all prospective employees, agents, and members of the Legislature.

Any employee or prospective employee who holds, or intends to hold, a position for Tompkins County is required to disclose any name changes and any involvement in non-compliant activities including health care-related crimes. In addition, the County performs reasonable inquiries into the background of such applicants, agents, and members of the Legislature.¹

¹ The Department of Health and Human Services' Office of Inspector General (HHS OIG) has been given the authority to exclude from participation in Medicare, Medicaid, and other Federal health-care programs individuals and entities who have engaged in fraud or abuse.

II. COMPLIANCE PROGRAM OVERSIGHT

A. The Role of the Compliance Officer

The County Administrator, with the approval of the County Legislature, designates a Compliance Officer. The Compliance Officer is directly obligated to serve the best interests of our county organization, consumers, and employees. Responsibilities of the Compliance Officer include, but are not limited to:

- Serving as Chair of the County Compliance Committee.
- Overseeing and monitoring implementation of the compliance program, including developing and implementing compliance policies and procedures.
- Directing County internal reviews established to monitor effectiveness of compliance standards.
- Providing guidance to management, medical/clinical program personnel, and individual departments regarding policies and procedures and governmental laws, rules, and regulations.
- Updating the Program, periodically, as changes occur in County operations, in law and regulations, or by governmental and third-party payers.
- Overseeing efforts to communicate awareness of the existence and contents of the Program.
- Coordinating, developing, and participating in the educational and training program.
- Ensuring Employees and Agents are aware of the requirements of the County's Compliance Program.
- Seeking up-to-date material and releases regarding regulatory compliance.
- Maintaining a reporting system, including a dedicated and confidential Whistleblower HelpLine, and responding to concerns, complaints, and questions related to the Program.
- Acting as a resource for regulatory compliance issues.
- Coordinating internal investigations and implementing corrective action on issues related to noncompliance or compliance-related risk.

B. The Structure, Duties, and Role of the Compliance Committee

Compliance Committee members are appointed by the County Administrator and approved by the Legislature. Compliance issues are reported by the Compliance Committee to the County Administrator, and to the Legislature where appropriate. The role of the Compliance Committee is to advise and assist the Compliance Officer with implementation of the County Compliance Program.

The County Compliance Committee membership includes:

- County Compliance Officer
- County Attorney
- County Finance Director
- Personnel Commissioner
- Department of Social Services Commissioner
- Mental Health Commissioner
- Public Health Department Director
- Information Technology Services Director

The roles of the Compliance Committee include:

- Analyzing the environment where the County does business, including legal requirements with which it must comply.
- Reviewing and assessing existing policies and procedures that address these risk areas for possible incorporation into the Compliance Program.
- Working with departments to develop standards, policies, and procedures that address specific risk areas and encourage compliance according to legal and ethical requirements.
- Advising and monitoring appropriate departments related to compliance matters.
- Developing internal systems and controls to carry out compliance standards and policies.
- Monitoring internal and external reviews to identify potential noncompliant issues.
- Implementing corrective and preventive action plans.
- Developing a process to solicit, evaluate, and respond to complaints and problems.

III. EDUCATION AND TRAINING

A. Expectations

Education and training are critical elements of the County Compliance Program. Every employee and agent is expected to be familiar with and knowledgeable about the Program and have a solid working knowledge of his or her responsibilities under the program.

Compliance policies and standards will be communicated to all employees and designated agents through required participation in training programs.

B. Orientation

As part of his or her orientation, each employee and agent shall receive a written copy of the Compliance Program document, policies, and specific standards of conduct affecting the employee's position or will be directed to a place where Program documents can be accessed.

C. Attendance

All education and training relating to the Program will be verified by attendance records and signed acknowledgement of receipt of Program documents.

Attendance at compliance training sessions is mandatory and a condition of continued employment.

IV. EFFECTIVE CONFIDENTIAL COMMUNICATION

A. Expectations

Open lines of communication between the Compliance Officer and every employee and agent subject to this Program are essential to the success of our Compliance Program.

Every employee has an obligation to refuse to participate in any wrongful course of action and to report the actions according to the procedure listed below.

B. Reporting

If an employee or agent witnesses, learns of, or is asked to participate in any activities that are potentially in violation of County policy or procedure, or state or federal law, he or she must contact his or her immediate supervisor, the County Compliance Officer, or the County Administrator. Similarly, a member of the public may also confidentially disclose information she or he reasonably believes evidences a violation of law; an abuse of authority or regulation; a substantial and specific danger to public safety; or a gross mismanagement or gross waste of county funds. Reports may be made in person, or by calling a toll-free telephone line dedicated for the purpose of receiving such notification [877-348-1396], or by mailing information to the County Compliance Officer of Tompkins County, 125 East Court Street, 3rd Floor, Ithaca, New York 14850.

C. Protections

The identity of reporters will be safeguarded to the fullest extent possible and reporters will be protected against retribution. Reporting of any suspected violation of County policy or procedure, or state or federal law by following the requirements of this policy shall not result in any retribution. Any threat of reprisal against a person who acts in good faith pursuant to

his or her responsibilities under the Program is acting against the County's compliance policy. Discipline, up to and including termination of employment, will result if such reprisal is proven.

D. Guidance

Any employee and agent may seek guidance from the County Compliance Committee (see Committee list in Section II.B.) with respect to the Program or Code of Ethics at any time by following the reporting mechanisms outlined above.

V. ENFORCEMENT OF COMPLIANCE STANDARDS

A. Background Investigations

For all employees who have authority to make decisions that may involve compliance issues, the County will conduct a reasonable and prudent background investigation, including a reference check, as part of every employment application.

B. Disciplinary Action (General)

Employees who fail to comply with County policy or procedure, or state or federal law, or who have engaged in conduct with the potential to impair the County's status as a reliable, honest, and trustworthy service provider, will be subject to disciplinary action, up to and including termination. Any disciplinary action will be appropriately documented in the employee's personnel file, along with a written statement of reason(s) for imposing such action. The Compliance Officer shall maintain a record of all disciplinary actions involving the Program and report at least quarterly a summary of these actions to the County Administrator.

C. Disciplinary Action (Supervisory)

Supervisors will be sanctioned for failure to adequately instruct their staff or for failure to detect noncompliance with applicable policies and legal requirements where reasonable diligence on the part of the manager or supervisor would have led to the earlier discovery of any problems or violations and would have provided the County with the opportunity to correct them.

VI. REVIEWING AND MONITORING OF COMPLIANCE ACTIVITIES

Ongoing evaluation is critical to detecting non-compliance and will help ensure the success of County's Compliance Program. This will be accomplished through an ongoing review and monitoring system, implemented by the Compliance Officer in consultation with the Compliance Committee.

VII. DETECTION AND RESPONSE

A. Violation Detection

The Compliance Officer, in consultation with the County Administrator, County Attorney, and Compliance Committee will review whether any basis exists to suspect that a violation of the Compliance Program has occurred. Should a violation or potential violation appear to have occurred, the Compliance Officer, with input from the County Administrator and Compliance Committee, shall conduct a more detailed investigation.

B. Reporting

At the conclusion of an investigation, the County Attorney may be asked by the Compliance Officer or the County Administrator to prepare a written report summarizing the findings and providing recommendations, which may include rendering an opinion regarding whether a violation of the law has occurred.

C. Rectification

If the County identifies that an overpayment was received from any third-party payer, the appropriate regulatory (funder) and/or prosecutorial (attorney general/police) authority will be appropriately notified, with the advice and assistance of counsel. Funds received as a result of overpayments will not be retained. In instances where it appears an affirmative fraud may have occurred, appropriate amounts shall be returned after consultation and approval by involved regulatory and/or prosecutorial authorities. Systems shall also be put in place to prevent such overpayments in the future.

D. Record Keeping

Regardless of whether a report is made to a governmental agency, the Compliance Officer shall maintain a record of the investigation, including copies of all pertinent documentation. This record will be considered confidential and privileged and will not be released without the approval of the County Administrator or the County Attorney.

VIII. WHISTLEBLOWER PROVISIONS AND PROTECTIONS

A. Provisions

The federal False Claims Act of 1863 (revised in 1986) provides protection to qui tam² relators who are discharged, demoted, suspended, threatened, harassed, or in any other manner discriminated against in the terms and conditions of their employment as a result of their furtherance of an action under the False Claims Act.

² *Qui tam* is a provision of the **Federal Civil False Claims Act** that allows private citizens to file a lawsuit in the name of the U.S. Government charging fraud by government contractors and others who receive or use government funds, and to share in any money recovered.

The County will not take any retaliatory action against an employee if the employee discloses information about the County's policies, practices or activities to a regulatory, law enforcement, or other similar agency or public official.

B. Protections

The employee's disclosure is protected only if the employee first brought up the matter with a supervisor, the County Compliance Officer, or the County Administrator and gave the employer a reasonable opportunity to correct the alleged violation, unless the danger is imminent to the public or a patient and the employee believes in good faith that reporting to a supervisor would not result in corrective action. The County will protect qui tam relators. For details on policy implementation, please refer to *The Administrative Manual: The Policies and Procedures of Tompkins County Government*, Policy #01-45.

C. Procedures for the Receipt, Retention, and Treatment of Complaints

The following procedures apply to all Whistleblower complaints received by the County Compliance Officer:

1. The Compliance Officer (or other responsible officer) shall log the complaint into a complaint book or electronic database (the "log").
2. The Compliance Officer shall determine if it is a complaint that is appropriate for investigation, i.e. one that alleges a violation of law or regulations.
3. The Compliance Officer will notify the County Administrator, who in consultation with the County Attorney and/or other officials as appropriate, will determine the most appropriate individual or group to conduct the investigation.
4. The selected investigator(s) shall perform the investigation, which may include interviews, reviews of documents, and other appropriate methods of gathering evidence.
5. The investigator shall document conclusions of the investigation.
6. The County Administrator or other appropriate officials shall determine what actions to take as a result of the investigation.
7. The most appropriate County official will notify the complainant if appropriate and any other appropriate individuals or parties, including law enforcement, State or Federal agencies.
8. The Compliance Officer shall note in the log that the investigation is complete and the actions taken.

COMPLIANCE POLICIES AND PROCEDURES

Exclusion Screening Policy

Tompkins County government and its related entities are committed to maintaining high-quality service and integrity in its financial and business operations. Therefore, all necessary steps will be taken to ensure that healthcare-related employees, providers, contractors, prescribing/authorizing physicians, etc., who provide and/or perform services for or on behalf of the County have not been the subject of adverse governmental actions and/or excluded from the federal healthcare programs.

The exclusion-screening policy demonstrates the County's intent to comply with Federal and State mandates to screen employees, independent contractors, business vendors, key providers, and governing-board members to verify that they have not been involved in adverse governmental actions related to fraud, patient abuse, licensing-board sanctions, license revocation/suspension/surrender, or have defaulted on Health Education Assistance Loans and are therefore on a federal (or state) Excluded Parties List.³

The County will conduct monthly exclusion screening of all employees, potential vendors, and governing Board members (initially, the County Legislature, Community Mental Health Services Board, and Board of Health) that have authority to grant appropriations or that contribute to the development or execution of policy as these actions relate to the use of Medicaid or Medicare funds. In addition, for employees that require specific medical/healthcare license/certification in order to perform their duties, these credentials will be verified with appropriate licensing and disciplining authorities.

The County will conduct exclusion checks of the following sources to determine if the individual or entity's name appears on any of the following lists:

- U. S. Department of Health and Human Services, Office of Inspector General (OIG)'s List of Excluded Individuals and Entities (LEIE) currently available on the website at <http://exclusions.oig.hhs.gov>
- The General Services Administration (GSA)'s Excluded Parties List System currently available on the GSA website at <http://www.epls.gov/>
- NYS Medicaid Fraud Database currently available on the NYS Department of Health website at <http://www.emedny.org/info/disqualified.html>

Individuals and entities excluded from federal healthcare programs will be prohibited from holding a position, or conducting business with the County, in any area that is directly or indirectly funded by a state or federal program that bars participation by such excluded individuals and entities.

³ The Excluded Parties List System (EPLS) is an electronic, Web-based system that identifies those parties excluded from receiving federal contracts, certain subcontracts, and certain types of federal financial and non-financial assistance and benefits. The EPLS keeps the user community aware of administrative and statutory exclusions across the entire government. See: <http://www.gsa.gov/portal/content/101991>

For details on policy implementation, please refer to *The Administrative Manual: The Policies and Procedures of Tompkins County Government*, Policy #01-46.

Whistleblower Policy

This policy is intended to support the reporting of illegal activities and to protect officers and employees from retaliation who, in good faith, have reported a concern of improper governmental action. This policy implements New York State Labor Law §740 and Civil Service Law §75-b.

Any officer or employee of the County who becomes aware of improper governmental action by an officer or employee of the County must report such conduct. No officer or employee of the County shall take retaliatory action against an employee because the employee makes a good-faith report of any information regarding fraud, waste, abuse, misconduct, or any alleged prohibited or illegal activity in violation of any law, rule, or regulation governing officers and employees of the County of Tompkins. Reports of concerns will be kept confidential to the extent possible, consistent with the need to conduct a complete and fair investigation.

For details on policy implementation, please refer to *The Administrative Manual: The Policies and Procedures of Tompkins County Government*, Policy #01-45.

GLOSSARY OF TERMS

Abuse. Actions that do not involve intentional misrepresentations of fact, but nevertheless are inconsistent with sound financial, business, or healthcare practices and create significant risk to the integrity of the organization such as 1) unnecessary cost to the programs, 2) reimbursement for services that are not medically necessary, or 3) reimbursement for services that fail to meet professionally recognized standards of care.

Agents. Any person or business that acts as a representative of, or has the authority to act for or on behalf of Tompkins County.

Anti-kickback Statute. The federal statute, as it relates to healthcare, which prohibits anyone from knowingly and willfully soliciting, receiving, offering, or paying any remuneration directly or indirectly, in cash or in kind, in exchange for services or purchases for which payment may be made by Medicare and/or Medicaid.

Compliance Committee. A group of people designated and chaired by the Compliance Officer to oversee and help administer this Compliance Program.

Compliance Officer. A person within the County organization who is assigned the responsibility of maintaining and overseeing an effective County Compliance Program.

Compliance Program. This Program establishes the standards of conduct for Tompkins County designed to promote honest and ethical behavior, and also provides a structure for educating and communicating those standards to employees, with the overall objective to prevent, detect, and report significant noncompliance.

Exclusion Screening. An inspection process conducted pre- and post-hire of employees, independent contractors, business vendors, key providers, and governing-board members to verify that they have not been involved in adverse governmental actions related to fraud, patient abuse, licensing-board sanctions, license revocation/suspension/surrender, or have defaulted on Health Education Assistance Loans and are therefore on a federal (or state) Excluded Parties List. The screening process demonstrates intent to comply with Federal and State mandates.

Federal False Claims Act. A federal law that imposes liability on any person who submits a claim to the federal government that he or she knows (or should know) is false. The False Claims Act also imposes liability on an individual who may knowingly submit a false record in order to obtain payment from the government. The third area of liability includes those instances in which someone may obtain money from the federal government to which he or she may not be entitled, and then uses false statements or records in order to retain the money. The Act provides that private parties may bring an action on behalf of the United States. These private parties are known as “qui tam relators.”

Federal Program. Medicare, Medicaid, and any other programs funded by the federal government.

Fraud. Intentional misrepresentation designed to induce reliance by another person to obtain an unauthorized benefit.

Governmental Agencies. Agencies involved in healthcare investigations include, but are not limited to, the U.S. Department of Health and Human Services' Office of Inspector General, U.S. Department of Justice, Federal Bureau of Investigation, Centers for Medicaid and Medicare Services, New York State Department of Health, Office of the Medicaid Inspector General, New York State Medicaid Fraud Control Units, and New York State Office for People with Developmental Disabilities.

HIPAA. A federal law titled "Health Insurance Portability and Accountability Act". Regulations issued under HIPAA protect the privacy of health information and identifying information for all Americans. HIPAA went into effect on April 14, 2003.

Independent Practitioner. Any vendor, physician, dentist, therapist, psychologist, social worker, nursing staff member, dietician, volunteer, agent or other person who is empowered by contract or otherwise to provide health-related services for or on behalf of Tompkins County.

Knowingly. To act "knowingly" is to act with actual knowledge, deliberate ignorance, or a reckless disregard for the truth or the falsity of information.

Misconduct. Any action, behavior, or failure to act that is not in conformity with Tompkins County's standards, guidelines, or procedures or that is a violation of any federal, state or local law or regulation.

Negligent. Exhibiting lack of due care or concern.

New York State False Claims Act. Closely tracks the federal False Claims Act (FCA). It imposes penalties and fines on individuals and entities that file false or fraudulent claims for payment from any state or local government, including healthcare programs such as Medicaid.

Non-compliance. Failure or refusal to act in accordance with this Compliance Program, or other standards or procedures, or with federal, state or local laws or regulations.

Private Payor Programs. Any payor of healthcare services other than Medicare or Medicaid, including but not limited to private individuals and insurance plans.

Qui Tam Relator. Individuals who bring an action on behalf of the United States under the federal False Claims Act (FCA) or on behalf of New York State under the New York State False Claims Act. Qui Tam Relators may share in a percentage of the proceeds from an FCA action or settlement. Also known as "whistleblowers."

Regulatory Violation. Any action that constitutes fraud, abuse, or a violation of a federal, state or local law or regulation.

State Program. Medicaid or any other program funded in whole or part by New York State.

Waste. Unnecessary expenditures or to use carelessly.

Whistleblower. See Qui Tam Relator

Whistleblower Protection. Protection provided under the federal law and the State False Claims Act to whistleblowers or qui tam relators who are discharged, demoted, suspended, threatened, harassed, or in any other manner discriminated against in the terms and conditions of their employment as a result of their furtherance of an action under the federal law or the State False Claims Act.

TOMPKINS COUNTY VISION STATEMENT (January 1997)

The vision of the Tompkins County Legislature is a county where our residents' social and economic well-being flourish in an environment that is physically safe and supportive.

We see a community where all people are physically safe, financially secure, and able to enjoy physical, social, and mental well-being,

- where residents of all ages are valued and included and feel that way;
- where families of all kinds are considered important and strengthened;
- where those most vulnerable are cared for respectfully and fairly;
- where all people appreciate diverse cultures and opinions, take personal responsibility for their actions and treat each other with civility;
- where freedom of expression and privacy are respected and protected;
- where individual learning and growth opportunities abound and full participation in civic life is fostered;
- where arts and cultural resources are supported as important community assets.

We see a community where diverse economic enterprises prosper and are in harmony with the natural and built environment,

- where everyone can learn job skills and have employment opportunities;
- where all residents share equitably in the wealth of the community and support the community in accordance with their ability to pay;
- where all residents can support themselves, their families, and their community from generation to generation.

We see a community where all people respect the land, and historic and cultural sites, and act as wise stewards of our finite resources and the beauty of the landscape,

- where land-use decisions reflect this stewardship;
- where our historic and cultural heritage are respected and protected by all;
- where people, goods, and information travel easily and safely on networks that are well-integrated into the environment.

We see a community where local governments, educational institutions, churches, businesses, and community organizations work together to provide high-quality, cost-effective services easily available to all.

TOMPKINS COUNTY MISSION STATEMENT (January 1997)

The mission of the Tompkins County Legislature is to collectively meet the needs of our residents and communities and to realize the Legislature's articulated vision. County government will perform those functions not provided as well by individuals, the private sector, other levels of government, or the not-for-profit sector. County activities will be designed to protect and enhance the lives of the County's diverse residents and communities in ways that are compassionate, ethical, and creative within the limits of what residents financially support.

To this end we will:

- Allocate fiscal resources consistent with our vision, goals, policies, and community needs
- Foster open and honest communication among governments and county residents and employees. County government will initiate dialogue on the community needs, the appropriate role of County government, and satisfaction with the County's direction, initiatives, and services
- Create and implement policies that:
 - enhance the economic opportunity and well-being of all County residents
 - safeguard the health, safety, and rights of our residents and employees
 - protect the natural environment for future generations and maintain the built environment
 - prevent the need for more costly future services
- Encourage and support programs that:
 - achieve the County's goals
 - deliver needed services
 - serve vulnerable populations
 - strengthen families and communities
 - enhance our quality of life
- Operate a well-run organization by:
 - using a well trained, diverse work force of employees, qualified contractors, and volunteers
 - providing adequate personnel, financial, facility, and informational support to approved programs
 - producing a balanced budget that supports the County's vision, mission, and goals with appropriate reserves for future uncertainties
 - carrying out the mandates of state and federal governments
 - acting as a resource and partner for other local governments
 - responding flexibly and responsibly to emerging needs and changing mandates.