

2020 County Compliance Program Progress Report

Year At-a-Glance

In 2020, we were confronted with the COVID-19 and although the pandemic was the primary focus for many government entities, Tompkins County's efforts continued to address compliance areas across the organization. Areas that were pursued included Administrative Policy Manual revisions, exclusion screening, and annual mandatory employee training. Despite the unforeseen circumstances of a national and statewide shutdown, progress was made in updating the Administrative Policy Manual and implementing additional new policies that were needed to stay in line with Federal and State regulations. The County transitioned from Kantola and utilized an existing third-party vendor to contract training services which met our annual requirements for New York State Sexual Harassment Training. Looking ahead to 2021, the Compliance Program Coordinator will continue to work with departments to develop and revise policies within the Administrative Policy Manual and the County will seek continued focus on improving employee training which may include a virtual option.

Key Accomplishments

Administrative Policy Manual.

The thorough review of the Tompkins County Administrative Policy Manual continued during the year 2020. The Compliance Program Coordinator worked with several departments to update content in existing policies and implement several new policies across the County.

During the 2020 calendar year, the following progress was made:

- 9 existing policies were revised
- 3 policies were abolished
- 6 new policies were adopted

Information Technology Services.

Throughout the past year ITS completed an assessment of the Board of Elections (BOE) Information systems infrastructure, which included the County's network infrastructure, Microsoft Office 365 environment, and additional County systems that BOE utilizes. ITS completed and developed plans to harden the County's infrastructure based on that assessment.

The majority of Public Health's Early Intervention records have been transitioned from a paper-based system to a secure, compliant, Cloud-based information system with secure communication for client's guardians.

A non-reportable breach investigation that revealed the need of a department's organization of its unstructured data has been closed. ITS provided the department a report on the data (from the County's data analysis software) and the department was able to clean up old data and allocated access of the remaining data according to required access for business needs.

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 utilized increased in 2020 to 305 services provided due to the need for additional virtual and telephone services during the COVID-19 pandemic. This did however result in a decreased cost of \$12,549.04 over prior years. In 2019, there were 220 of these services provided at a cost of \$24,350.60.

NYS Mandatory Sexual Harassment Training. Per requirements of New York State, every employer was required to adopt a sexual harassment prevention policy and required to provide employees with sexual harassment prevention training at time of hire and annually thereafter beginning in 2019. In 2020, Tompkins County partnered with an existing third-party vendor, KnowB4, to deliver harassment prevention training to all County employees. The same third-party vendor will continue to be used in 2021 to deliver training to new employees at time of hire and to existing employees to meet the annual requirement.

Annual Mandatory Compliance and Safety Training. During the COVID-19 pandemic the ability for in-person annually training was not obtainable in order to protect the health and safety of our employees, in addition to complying with Federal and State regulations. The County Health and Safety Coordinator, Compliance Program Coordinator, and Information Security Compliance Officer joined forces to meet the County's annual mandatory compliance and safety training goal along with Cyber Security training by launching pre-recorded training videos, which were made available to all new and existing employees.

Exclusion Screening. The County's Compliance Program calls for the for routine identification of risk areas to help detect potential fraud or regulatory non-compliance. One component of this is the monthly screening of all employees, contractors, and vendors to ensure that they have not been involved in adverse actions related to fraud or abuse of government funds, or, if applicable, have not been excluded from Federally funded healthcare programs. In 2020, Tompkins County continued to partner with the third-party vendor, Verify Comply, for screening and monitoring services. The Compliance Program Coordinator periodically worked with the affected departments to upload data and provided training refreshers on the software as needed during 2020.

Challenges and Opportunities for 2021

Compliance Education. The ongoing effort to put in place an effective plan for new hire and annual mandatory compliance training County-wide will continue into 2021. Due to the many challenges surrounding employee training that we faced in 2020, we have gotten a firsthand look into the positive impacts transitioning away from the traditional in-person annual training program to an electronic format that we may choose to continue moving forward.

Administrative Policy Manual Updates. The Administrative Policy Manual will continue to be reviewed throughout 2021 to update outdated policies to reflect current practices. The Compliance Program Coordinator will work with appropriate departments throughout the year to continue the administrative review and amendment process.

This report was prepared and submitted by

Tompkins County Compliance Committee

Lisa Holmes
Deputy County Administrator/
County Compliance Officer
County Administration

Ruby Pulliam
Commissioner
Department of Human Resources

Frank Kruppa
Director
Public Health Department/
Commissioner
Mental Health Department

Jessi Spudis
Compliance Program Coordinator
County Administration

Rick Snyder
Director
Finance Department

Jonathan Wood
County Attorney

Roger Cotrofeld
Information Security Compliance Officer
Information Technology Services

Greg Potter
Director
Information Technology Services

Kit Kephart
Commissioner
Department of Social Services