2019 County Compliance Program Progress Report

Year At-a-Glance

In 2019, great progress was made in updating the Administrative Policy Manual and implementing many new policies that were needed to stay in line with Federal and State regulations. ITS focused on the importance of security training for new and existing employees and implemented an Intrusion Detection System (IDS) within the County network. The County contracted with a third-party vendor to include newly required New York State Sexual Harassment Training into our new hire and annual mandatory training programs. Looking ahead to 2020, ITS will continue to advance County technology-based systems, the Compliance Program Coordinator will continue to work with departments to develop and revise policies within the Administrative Policy Manual, and the County will pursue the focus on improving employee training, as it is a key component of an effective compliance program

Key Accomplishments

Administrative Policy Manual.

Beginning in early 2019, a thorough review of the Tompkins County Administrative Policy Manual commenced. The Compliance Program Coordinator worked with several departments to update content in existing policies and implement several new policies across the County.

During the 2019 calendar year, the following progress was made:

- 26 existing policies were revised
- 4 policies were abolished
- 7 new policies were adopted

Information Technology Services. During 2019 ITS focused on two (2) areas to better secure the County's network. The first focused on educating County employees on how to identify methods that hackers and criminals use to breach a network through employee actions. This training identifies the number one method of attack being breach through email. Additional methods of attack typically are via phone and other social manipulation techniques.

The second area of focus in 2019 was a Federal and State initiative of installing an intrusion detection system (IDS) on the County network. The IDS system has 24/7 monitoring by a grant specified vendor and has a more active defense compared to antivirus and other monitoring tools. This system analyzes traffic of all computers on the County network and alerts ITS when the network traffic is malicious. ITS is notified within minutes by the vendor when the traffic represents a large risk and ITS continuously monitors the IDS for less risky alerts.

ITS had one reportable breach in 2019, which was reported to State and Federal law enforcement. By compromising an Office 365 account a hacker attempted to steal from a taxpayer who was behind on paying property taxes. Our systems were able to identify and secure the Office 365 account, and when the taxpayer emailed the finance department to confirm the transfer of funds, we were able to direct him to disregard the hacker's email.

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 2019 to 220 services provided at a cost of $24,350.60. In 2018, there were 142 of these services provided at a cost of $16,868.93.

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. Tompkins County partnered with a third-party vendor, Kantola, to deliver harassment prevention training to all County employees in 2019. A third-party vendor will continue to be used in 2020 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. The Committee continued to serve as a resource for compliance matters, particularly those related to risk-prevention and County policy. The County Health and Safety Coordinator and Compliance Program Coordinator joined forces to meet the County's annual mandatory compliance and safety training goal, delivering nine (9) live education sessions and numerous training packets across thirty (30) departments, divisions, and offices.

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 2019, Tompkins County partnered with a new third-party vendor, Verify Comply, for screening and monitoring services. The Compliance Program Coordinator worked with four (4) affected departments to upload data and provided training assistance on the new software, leaving one (1) remaining department to be completed in 2020.

Challenges and Opportunities for 2020

Strengthening Information Security. In 2020, ITS will continue advancement of technology-based systems. As our systems advance and protocol has changed in recent years, there will be a needed focus on the revision and development of new ITS policies and procedures.

Compliance Education. The ongoing effort to put in place a cohesive plan for new hire and annual mandatory compliance training County-wide will continue into 2020. The analysis of the compliance objectives common to the organization as a whole will continue to determine training content and identify training gaps. A look into transitioning the current traditional annual training programs to an electronic format is on the horizon.

Administrative Policy Manual Updates. The Administrative Policy Manual will continue to be reviewed throughout 2020 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

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