2024 County Compliance Program Progress Report

Year At-a-Glance

During 2024, the Committee continued its work in the area of compliance by supporting County Administration and fellow departments in the review of existing policies that set standards to meet the County's vision of excellence. The largest undertaking, which will continue through 2025, will be the County's risk and compliance assessments and implementation of recommendations to ensure the County remains in compliance with updates to Federal and State regulations. Finally, efforts continued around cyber security as attackers become more brazen. The following *Key Accomplishments* section of this report provides details on these activities.

Key Accomplishments

Compliance Education. The Committee continued to serve as a resource for compliance matters, particularly those related to policy review and mandatory training. The County's Training Team worked with departments and employees individually to help meet the County's annual mandatory compliance training goal.

Risk Assessment. Beginning in the fall of 2024, the County procured consulting services from Bonadio & Co. to review the County's Compliance program to provide an updated assessment of the County's risk and current compliance with government regulatory agencies. The high priority objectives of this review and assessment include:

- HIPAA Security and Breach Rule Risk Assessment
- HIPAA Privacy Rule Assessment
- Diagnostic assessment and testing of Compliance Program with gap analysis

At the conclusion of this assessment, which is anticipated by mid-2025, Bonadio will present their findings and recommendations in the form of a gap analysis and an implementation work plan. They will provide specific recommendations based on industry standards, regulatory requirements, and best practices.

Administrative Policy Manual. The review of the Tompkins County Administrative Policy Manual continued in 2024. County Administration worked with departments across the County to update content in existing policies as well as develop and implement new policies as identified by the Legislature.

During the 2024 calendar year the following progress was made:

- 11 existing policies were revised
- 6 new policies were established

Finance. In 2024, Finance continued to focus on several areas to better assist the County in maintaining a clean compliance record to include: reviewing and updating foreclosure processes to align with updated NYS law, updating and testing physical security protocols, and implementing dual authorization for wire transfers and ACH payments. Finance took part in assisting County Administration with updating key administrative policies regarding employee travel and training, food expenses, and petty cash. Finance's large accomplishment in 2024 included implementing new software for payroll and accounts payable, filing all required NYS annual reports, and extended finance training to County departments.

Information Technology Services. ITS advanced several key initiatives in 2024 to strengthen operational effectiveness, enhance cybersecurity posture, and ensure overall compliance. Cybersecurity remained a top priority, with progress driven by interdepartmental collaboration, preparedness exercises, and the continued advancement of security measures through our partnership with NYS Division of Homeland Security and Emergency Services (DHSES). The department successfully filled the Information Security Analyst position, enabling dedicated focus on risk mitigation and staff training. As a result, meaningful strides were made to strengthen the County's overall security posture and increase cybersecurity awareness among staff. Multiple new IT policies were developed and formally adopted, including directives on confidential data handling, remote access, email usage, mobile device management, and password standards—further aligning departmental practices with regulatory requirements and security best practices. Additionally, ITS invested in critical infrastructure modernization efforts, including the procurement of advanced backup solutions to enhance system resilience and business continuity.

Interpretation/Language Requests. As part of ongoing performance monitoring of the County's Title VI Program, the Compliance Program tracks the provision of interpretation and translation services to better plan for language assistance efforts in the future. The total number of interpretation and translation services utilized in 2024 was 703, representing an increase from 2023. The total number of interpretation and translation services utilized were provided at a cost of $14,938.89. This can be related to the continuous need for virtual and telephone services of the County's clientele, in addition to the County strengthening the program and exceeding minimum standards of services and materials offered to the community.

Annual Mandatory Compliance and Safety Training. In 2024, the third-party vendor, KnowB4, was used once again to deliver annual mandatory training to all County employees. The County's annual mandatory compliance, safety, cyber security, and sexual harassment trainings were conducted virtually through online training and pre-recorded training videos. 96.9% of the County's workforce completed all required trainings by the deadline in 2024.

Exclusion Screening. The County's Compliance Program calls for the 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 2024, Tompkins County continued to partner with the third-party vendor, Verify Comply, for screening and monitoring services.

Challenges and Opportunities for 2025

Strengthening Information Security. ITS will continue to review internal policies and procedures throughout 2025 to include Acceptable Use of County Technology and Data Retention. An AI (Artificial Intelligence)/Machine Learning policy is in the research and development stages. While AI grows, the opportunity to expand on resources for employees to become more efficient in job responsibilities, risk grows as well—whether it's data privacy concerns, potential bias, or navigating complex regulations.

Finance. The Finance department will be fully implementing new procurement software used for their bidding processes during 2025. Department staff are committed to continuing their work on administrative and departmental policies and procedures which will assist in clarity of Finance processes for County employees.

Compliance Education. The ongoing effort to put in place an effective plan for new hire and annual mandatory compliance training County-wide was deemed a success for 2024. While we still saw the positive impacts transitioning away from the traditional in-person annual training program to an electronic format allowing employees to complete training at their own pace, discussions are being held to determine if a hybrid model between online and in-person training would be more effective for certain departments that struggle with access to technology during employee work times.

Administrative Policy Manual Updates. The Administrative Policy Manual will continue to be reviewed throughout 2025 to update outdated policies to reflect current practices. The Risk & Compliance Administrator with the assistance of the Deputy County Administrator, will work with appropriate departments throughout the year to continue the administrative review and amendment process. The Finance department will be dedicating time to update Finance related policies to meet County expectations and reflect current practices.

This report was prepared and submitted by

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