TOMPKINS COUNTY
Compliance Committee

2018 Compliance Program Progress Report

Year At-a-Glance

In 2018, a new Compliance Program Coordinator was brought on board to support ongoing research and implementation of the Compliance Program. In particular, this position will lead the County policy development and amendment process. The County will continue looking to improve compliance education efforts and review alternative methods for facilitation. Information Technology Services continued its work in the area of IT compliance by participating in a security assessment to ensure County data integrity and safety. ITS also worked internally to further the County's efforts of transitioning to electronic documentation processes to replace outdated paper processes.

Key Accomplishments

Compliance Program Coordinator position filled. A new full-time Compliance Program Coordinator was hired in the County Administration Department to support ongoing research, planning, and implementation of the County Compliance Program. Reporting directly to the Deputy County Administrator/County Compliance Officer, the Compliance Program Coordinator's responsibilities include researching State and Federal regulations, preparing training materials, facilitating training sessions, leading the policy development and review process, and processing compliance hotline submissions and complaints.

Since starting in November, the Compliance Program Coordinator has:

- Coordinated and co-led New Hire Mandatory Training sessions
- Begun facilitating the County policy development and update process
- Transitioned all existing County policies into a new standard format
- Integrated updates into the County's new hire and annual compliance training materials
- Updated the Compliance Fact Sheet Series and the Compliance FAQ document

Information Technology Services.

In 2018, ITS staff worked with the Department of Homeland Security to complete a Security Assessment. While some aspects of the assessment covered the County's IT infrastructure, some of the assessment focused on the Board of Elections and assuring the election processes of the County. Over the course of the last year, four (4) investigations yielded no reportable breaches of confidential information. In addition, ITS staff assisted the Tompkins County Health Department's Children with Special Needs (CSCN) division to transition from a largely paper-based records system to an electronic based records system. CSCN staff have already remarked that the new system has reduced the time spent on records, giving them more time to assist clients.

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 in 2018 was 142 at a cost of $16,868.93. In 2017, there were 129 of these services at a cost of $21,661.88.

Annual Mandatory Training. The Committee continued to serve as a resource for compliance matters, particularly those related to risk-prevention, IT compliance, and County policy. The County Health and Safety Coordinator worked to assist meeting the County's annual mandatory compliance and safety training goal, delivering three (3) live education sessions and numerous electronic training packets across thirty (30) departments, divisions, and offices.

Challenges and Opportunities for 2019

Strengthening Information Security. In 2019, ITS will be rolling out several initiatives to protect County data. The first is utilizing an IDS (Intrusion Detection System) which monitors network traffic and identifies possible negative network interactions. Secondly, ITS will begin the process of deploying an upgrade to the anti-virus software installed on County computers that uses Artificial Intelligence to better protect against attacks. ITS will also work on deploying a centralized system to record required mandatory training for County staff.

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, the County's exclusion screening process will continue to be reviewed to ensure screening is completed according to administrative policy, state and federal requirements. Included in this review will be examination of screening services offered by other vendors to determine if our current vendor agreement is competitive. The Compliance Program Coordinator will work with affected departments to providing training and/or training refreshers on the County's third-party screening system.

Compliance Education. The ongoing effort to put in place a cohesive plan for compliance training County-wide will continue into 2019. The first step of an organizational approach to educating for compliance is an analysis of the compliance objectives common to the organization as a whole. This helps to create a core value strategy to determine training content and identify training gaps.

Administrative Policy Manual Updates. The Administrative Policy Manual is due for an in-depth review as many policies are outdated or do not reflect current practices. The Compliance Program Coordinator will work with the appropriate departments throughout the year to begin the administrative review and amendment process.

This report prepared and submitted by

The Tompkins County Compliance Committee

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