



**COUNTY OF SULLIVAN
CORPORATE COMPLIANCE PROGRAM
SULLIVAN COUNTY GOVERNMENT CENTER
100 NORTH STREET
PO BOX 5012
MONTICELLO, NY 12701**

What's all this Talk about Compliance?

The main objective of our Corporate Compliance Program is to reduce risk associated with fraud, waste, and abuse. Transparency and improving monitoring systems and internal controls help identify and reduce risk. As an organization, it is vital that we hold ourselves to the highest standards to control, detect, and protect against, waste, fraud, and abuse. The Sullivan County Compliance Program was formally adopted by the County Legislature on August 15, 2019.

What is included in our County Compliance Program?

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, contracted personnel, and vendors to these same standards. These standards are upheld by the following elements:

- Corporate Compliance Officer, Compliance Program Coordinator, and Compliance Committee
- Code of Conduct
- False Claims Act
- Whistleblower Policy
- Confidential Reporting of Suspected Compliance Violations

How does an Effective Compliance Program Benefit Our Organization?

- Helps ensure that leadership, employees, operational structures and practices, including technology, are working in accord to manage risk.
- Provides a standard for reducing the likelihood of improper, illegal, or unethical conduct.
- Provides a methodology that encourages employees to actively identify and report potential problems.
- Improves the ability to quickly and accurately respond to operational compliance concerns.
- Creates a proactive (rather than reactive) approach to problem-solving that can potentially save time and resources.

What can Compliance Issues Look Like? *(This is not a complete list)*

- An employee discloses a client's personal information (intentionally or unintentionally).
- Theft of County time, goods or resources.
- Falsifying County records.
- Soliciting providers, contractors, producers, accounts, or customers/patients/clients for money, gifts, gratitude, or other personal benefits.
- Using, selling, possessing, manufacturing, dispensing, selling, or distributing alcoholic beverages or illegal drugs while on duty.
- Engaging in slander toward a co-worker/client/patient.

What is the Role of County Staff?

1. Review and understand the Code of Conduct, Employee Handbook, False Claims Act, Whistleblower Policy, and information on the County Compliance webpage.
2. Report anything that doesn't seem right.
3. Refuse to participate in any wrongful course of action that violates federal, state, or local laws, and regulations, or County policies.
4. Attend required annual County Compliance Program training.
5. Stay up to date on compliance requirements specific to your department's operations.

How to Report a Compliance Violation?

Any County employee or private citizen who witnesses, learns of, or is asked to participate in any activities that are potentially in violation may be done by either:

- Calling the toll-free, Confidential Compliance Hotline at **1-833-955-1559**
- Submit a written report concerning non-compliance, discrimination, or acts of waste, fraud, or abuse, to the Corporate Compliance Officer or the Commissioner of Human Resources (See details below).

The County maintains a Whistleblower Policy (Legislative Resolution No. 442-22) to protect the rights of so-called whistleblowers and that the County, in accordance with those statutes and with its own policy, does not permit retaliation against persons who, in good faith, report unlawful or fraudulent conduct within County government to appropriate officials.

When Happens When a Compliance Issue is Reported?

Any County employee or private citizen can make a report by either calling the hotline or submitting a written statement to the Corporate Compliance Officer or the Commissioner of Human Resources. Any complaint that is received will be reviewed. Complainants can submit an anonymous report. The complainant (if known) will be contacted using the information provided by the complainant in the complaint to clarify any missing information and provide an opportunity for the complainant to clarify or provide additional information related to the allegations received by the Compliance Office. After a proper investigation is conducted, the Compliance Office shall make a determination whether there has been a violation of the County's Compliance policy(s) and make written determinations to the appropriate County officials.

Who do I contact if I have questions or need guidance?

No set of policies or procedures can address every decision we make in our daily work activities. If you have a question about the right course of conduct, please contact Compliance@sullivanny.us.

You may also contact our Corporate Compliance Officer, Commissioner of Human Resources, or Compliance Program Coordinator:

Michelle Huck, Assistant County Manager &
Corporate Compliance Officer
100 North Street Monticello, NY 12701
(845) 807-0450
Michelle.Huck@sullivanny.us

Julie Diescher, Commissioner of Human Resources
100 North Street, Monticello, NY 12701
(845) 807-0485
Julie.Diescher@sullivanny.us

Christine Panos, Compliance Program Coordinator &
Wellness Coordinator
100 North Street, Monticello, NY 12701
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Christine.Panos2@sullivanny.us