



Duties of the Corporate Compliance Officer, Compliance Program Coordinator, and the Corporate Compliance Committee

Current Policy/Procedure Information

Policy/Procedure Number	Resolution Number	Revision Date	Next Scheduled Review	Responsible Department/Individual
COMP 1.0.1	N/A	June 2024	June 2025	Compliance Office



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Coordinator, and the Corporate Compliance Committee

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**Duties of the Corporate Compliance Officer, Compliance Program
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I. Statement of Procedure

Pursuant to Title 18 Part 521 Subpart 1.4 (b) and (c), the County has established a Corporate Compliance Committee. Members will be appointed by the County Manager and membership shall consist of senior-level officials. The Committee shall be responsible for coordinating with the Corporate Compliance Officer to ensure that the County is conducting its business in an ethical and responsible manner, consistent with its compliance program. This procedure outlines the duties and responsibilities, membership, designation of a chair and frequency of Committee meetings. This procedure will serve as the Corporate Compliance Committee's charter and shall be reviewed no less than annually.

II. Scope

This procedure applies to the Corporate Compliance Officer, Compliance Program Coordinator, and members of the Corporate Compliance Committee.

III. Reference

NYCRR Title 18 Part 521-1.4(b)(c)

IV. Procedure

The Corporate Compliance Officer possesses significant authority to address all compliance issues on a daily basis and shall be responsible for the following:

1. Overseeing and monitoring the adoption, implementation and maintenance of the compliance program and evaluating its effectiveness;
2. Accessing all records, documents, information, facilities and affected individuals that are relevant to carrying out their compliance program responsibilities;
3. Assisting the County in establishing methods to improve the compliance program's efficiency, quality of services, and reducing the County's vulnerability to fraud, waste and abuse;
4. Investigating and independently acting on matters related to the compliance program, including designing and coordinating internal investigations and documenting, reporting, coordinating, and pursuing any resulting corrective action with all internal departments, contractors and the State;
5. Drafting, implementing, and updating no less frequently than annually or, as otherwise necessary, to conform to changes to Federal and State laws, rule, regulations, policies and standards, a compliance work plan which shall outline the County's proposed strategy for meeting the requirements of SubPart 521-1.4 for the coming year, with a specific emphasis on written policies and procedures, training and education, auditing and monitoring, and responding to compliance issues;

6. Reviewing and revising the compliance program, and, in accordance with 521-1.3(a), the written policies and procedures and standards of conduct, to incorporate changes based on the organizational experience and promptly incorporate changes to Federal and State laws, rules, regulations, policies and standards;
7. The Corporate Compliance Officer shall report directly, on a regular basis, but not less than frequently and be accountable to the County Manager on the progress of adopting, implementing, and maintaining the compliance program;
8. The County Manager may designate another senior manager for reporting purposes provided, however, such designation does not hinder the compliance officer in carrying out their duties and having access to the County Manager or the Sullivan County Legislature;
9. Reporting directly, no less frequently than quarterly, to the Sullivan County Legislature during executive sessions on the progress of adopting, implementing, and maintaining the compliance program;
10. Reporting directly, no less frequently than quarterly, to the Corporate Compliance Committee on the progress of adopting, implementing, and maintaining the compliance program;
11. Chairing the Corporate Compliance Committee;
12. Overseeing the Compliance Program Coordinator's activities related the development of an effective compliance program;
13. Designating a Compliance Program Coordinator to chair and co-chair the Corporate Compliance Committee;
14. Reviewing and investigating reports of non-compliance and assigning investigations as needed;
15. Monitoring the Confidential Compliance Hotline;
16. Consulting with the County Attorney and determining if reporting to the appropriate government authority is necessary when credible evidence of or when there is a credible belief that a State or Federal law, rule, or regulation has been violated;
17. If such obligations exist, the Corporate Compliance Officer should coordinate and fulfill any such notice and reporting obligations;
18. Tracking all reports of non-compliance including the nature of investigations and outcomes,
19. Working closely with the Commissioner of Human Resources and the County Attorney in order to obtain guidance regarding any compliance reports and issues; and
20. Participating in OMIG's Self-Disclosure Program as necessary;
21. Reporting on closed investigations, unless earlier input is necessary to the Corporate Compliance Committee with confidentiality; and
22. Remaining professional in all actions and focus on reporting facts and evidence of work performed.

The Compliance Program Coordinator(s) shall be responsible for the following:

1. Developing and revising County policies and procedures for the County's Corporate Compliance Program;
2. Publishing and disseminating the Corporate Compliance Program's written policies and procedures to all affected individuals pursuant to Part 521-1.4(a);
3. Co-chairing the Corporate Compliance Committee;

4. Scheduling and coordinating Corporate Compliance Committee meetings including invitations, agendas and minute recording;
5. Accessing all records, documents, information, facilities and affected individuals (in collaboration with the Corporate Compliance Officer),
6. Researching state and federal regulations to promote compliance within the organization;
7. Developing and/or coordinating with the appropriate individual/department compliance training and education programs;
8. Assisting with compliance investigations and performing duties independently without bias;
9. Delegating compliance activities and deliverables to appropriate members of the Corporate Compliance Committee;
10. Delegating compliance activities and deliverables to appropriate members of the Corporate Compliance Champions;
11. Coordinating Corporate Compliance and Ethics week annually;
12. Coordinating compliance auditing and monitoring activities;
13. Developing and monitoring the County's Compliance Program webpage;
14. Promoting the lines of Communication to the Corporate Compliance Officer to affected individuals and Medicaid recipients of service
15. Maintaining confidentiality of all compliance related matters;
16. Chairing the DHHS Compliance Committee's; and
17. Remaining professional in all actions and focus on reporting facts and evidence of work performed.

The Corporate Compliance Committee shall be responsible for the following:

1. Coordinating with the compliance officer to ensure that the written policies and procedures, and standards of conduct required by subdivision Part 521-1.4(a) are current, accurate and complete, and that the training topics required by Part 521-1.4(d) are timely completed;
2. Coordinating with the compliance officer to ensure communication and cooperation by affected individuals on compliance related issues, internal or external audits, or any other function or activity required by Part 521;
3. Advocating for the allocation of sufficient funding, resources and staff for the compliance officer to fully perform their responsibilities;
4. Ensuring that the County has effective systems and processes in place to identify compliance program risks, overpayments and other issues, and effective policies and procedures for correcting and reporting such issues;
5. Assisting with internal and external audits as directed by the Corporate Compliance Officer;
6. Advocating for the adoption and implementation of required modifications to the compliance program;
7. Analyzing the regulatory environment where the County does business, including legal requirements with which it must comply;
8. Maintaining confidentiality of all compliance related investigations;
9. Keeping Corporate Compliance Program documents confidential, unless otherwise authorized;
10. Working with departments to develop standards and policies and procedures that address specific risk areas and to encourage compliance according to legal and ethical requirements;

11. Developing internal systems and controls to carry out compliance standards and policies and procedures;
12. Monitoring internal and external audits to identify issues related to non-compliance;
13. Implementing corrective and preventative action plans and following up as directed to determine effectiveness;
14. Encouraging reporting of noncompliance through the appropriate mechanisms;
15. Contributing and assisting as needed with the annual workplan, auditing and monitoring activities, annual effectiveness review, audit plan, and education plan as needed;
16. Engaging department heads by encouraging them to champion the compliance standards set forth by the Committee;
17. Remaining professional in all actions and focus on reporting facts and evidence of work performed when representing the Corporate Compliance Committee;
18. Understanding that this is not an exclusive list of responsibilities and other responsibilities may be added/removed as seen fit by the Corporate Compliance Officer.

V. Meeting Frequency and Membership:

The Corporate Compliance Committee will meet no less than quarterly. The Committee shall consist of the following senior-level County officials:

1. Corporate Compliance Officer (Chair)
2. Compliance Program Coordinator(s) (Co-Chair)
3. Commissioner of ITS and Chief Information Officer
4. Commissioner of Human Resources
5. County Attorney
6. Budget Director
7. County Auditor
8. The Department of Public Health designee
9. The Department of Community Services designee
10. The Department of Social Services designee

By signing this document, you formally attest to upholding the responsibilities as outlined within this charter, ensuring your commitment and accountability.

Printed: _____

Signed: _____

Date: _____



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VI. Document History

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