



Compliance Policy, Procedure, and Resolution Development

Current Policy/Procedure Information

Policy/Procedure Number	Resolution Number	Revision Date	Next Scheduled Review	Responsible Department/Individual
COMP 1.1	N/A		March 2025	Compliance Office



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I. Purpose

The purpose of this procedure is to create a framework for new compliance policy and procedures; modifying existing compliance policy and procedures, and periodically reviewing and updating compliance policies and procedures. This procedure aims at ensuring consistent and effective management of compliance policies and procedures, promotes adherence to applicable laws and regulations, and supports the County's commitment to ethical conduct.

II. Scope

This procedure applies to all County employees involved in the development, review, approval, implementation, and monitoring of compliance policies and procedures.

III. Reference

NYCRR Title 18, Part 521 and Resolution No. 305-19.

IV. Definitions

Policy: A Legislative statement of intention to guide political, management, financial, or administrative decisions and achieve rational outcome(s).

Procedure: A prescribed set of steps, actions, or activities generally needed to obtain consistent results.

Resolution: A formal expression of opinion, will or intent voted on by the Sullivan County Legislature.

Corporate Compliance Program: Refers to the County's chief compliance program in which all other compliance programs fall under.

Department level compliance program: Refers to compliance programs within the Division of Health and Human Services that must abide by the County's Corporate Compliance Program.

V. Procedure

A. General Information

1. Compliance procedures will be consistent with the NYCRR Title 18, Part 521 and relevant state and federal regulatory guidance;
2. Corporate Compliance procedures may be created based off of identified risks discovered during auditing and investigational activities;
3. The development of compliance policies and procedures shall follow the established process stated herein;
4. At least annually, the Corporate Compliance Committee will complete a comprehensive review of existing Corporate Compliance policies and procedures to determine whether revisions or updates are necessary to ensure compliance;
5. All Corporate Compliance policy and procedure additions and revisions will utilize the County's compliance policy/procedure template;
6. All Corporate Compliance policy and procedure additions and revisions will be inserted into the Sullivan County Corporate Compliance Program Policy and Procedure List for tracking purposes;

7. In collaboration with the Corporate Compliance Committee, the Corporate Compliance Officer along with the County Attorney will determine which Corporate Compliance policies are required to go through the Legislative adoption process;
8. Unless otherwise stated herein, once a Corporate Compliance policy has been formally adopted by the Legislature or a procedure adopted by the Corporate Compliance Committee, the Corporate Compliance Office will determine the appropriate method of initial distribution of the approved policy. Nevertheless, the policy will be referenced in the Employee Handbook, the Sullivan County Portal, and the County's Corporate Compliance webpage;
9. Procedures that are not required to be adopted by the Legislature will be adopted by the the Corporate Compliance Committee;
10. Department heads, supervisors, and directors have the responsibility of ensuring compliance with County compliance policies and procedures within their respective department;
11. Failure to follow the procedures stated herein may result in disciplinary action including and up to termination;
12. The Corporate Compliance Office shall monitor adherence to compliance policies, conduct audits and reviews, and take corrective actions when non-compliance is identified;
13. Pursuant to NYCRR Title 18, Part 521, all compliance policies and procedures to be retained for a period of six (6) years;
14. The Corporate Compliance Office shall maintain a record retention system to maintain a centralized repository of all compliance policies and procedures.

B. Proposing a New or Revising an Existing Corporate Compliance Policy

1. First draft and revisions to existing compliance policies will be approved by the Corporate Compliance Officer and the County Attorney;
2. Upon the Corporate Compliance Officer and County Attorney's approval, the policy will be presented to the Corporate Compliance Committee for review;
3. Once vetted by the Corporate Compliance Committee, the Corporate Compliance Office will follow the procedures for developing a resolution for the proposed policy;
4. The Corporate Compliance Officer will present the drafted policy to the Executive Committee of the Legislature;
5. The Executive Committee will review new policies and amendments to existing policies for approval by the Legislature.

C. Proposing a New or Revising an Existing Corporate Compliance Procedure

1. First draft and revisions to existing compliance procedures will be approved by the Corporate Compliance Officer and the County Attorney;
2. Upon the Corporate Compliance Officer, the procedure will be presented to the Corporate Compliance Committee for review and adoption;
3. If revisions are determined, the Compliance Program Coordinator, in consultation with the Corporate Compliance Officer shall insert the Corporate Compliance Committee's recommendations;
4. The Corporate Compliance Committee may choose to adopt the procedure with the recommended changes or adopt at the next scheduled Committee meeting.

D. Proposing a New or Revising an Existing Department Level Compliance Procedure

1. The Department of Public Health, the Department of Social Services, and the Department of Community Services shall create and implement a departmental Corporate Compliance Program which aligns with the County's Corporate Compliance Program;
2. Department level compliance procedures will not supersede the County's Corporate Compliance Program or any state or federal regulation;
3. The Department of Public Health, the Department of Social Services, and the Department of Community Services will abide by regulatory oversight bodies and regulatory updates that are relevant to compliance. It is the responsibility of the Department to cross-reference NYSCRR Title 18 Part 521 with other relevant regulatory guidance to forge compliance;
4. Proposing a new department level compliance procedure and revising an existing department compliance procedure shall be done at the department's compliance committee meeting;
5. Department level compliance committees to be chaired by a County Compliance Program Coordinator;
6. Department level compliance committees will review their compliance policies and procedures at least annually;
7. The department level designee, in consultation with the Compliance Program Coordinator will draft new or revised procedures and submit to the Compliance Program Coordinator;
8. The Compliance Program Coordinator will submit the draft to the Corporate Compliance Officer for review;
9. The Corporate Compliance Officer shall suggest edits as necessary and return the draft to the Compliance Program Coordinator;
10. The department designee shall insert the Corporate Compliance Office's edits and prepare a final draft;
11. The final draft shall be presented to the department level compliance committee for review and adoption;
12. The department shall establish and maintain a record keeping and documentation system;
13. The department shall establish a training and awareness program that familiarizes employees with new and updated departmental procedures;
14. The department shall establish a procedure implementation plan for effectively communicating and integrating the procedure within County operations.



**Sullivan County
Corporate Compliance Program**

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X. Document History

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COMP 1.1	N/A	March 2024 (Effective)