

Genesee County established a Compliance Program to promote an organizational culture that encourages truthfulness, ethical conduct and a commitment to compliance with federal and state laws, rules and regulations, payor program requirements and the County's business practices governing its operations. Genesee County adopted a Corporate Compliance Plan effective November 1, 2007 and made required updates in subsequent years.

The Compliance Committee and Compliance Officer are responsible for oversight of the Compliance Program. The Compliance Officer is designated as the Genesee County Compliance Officer and as such, is responsible for overseeing day-to-day operations of the Compliance Program. The role of the Compliance Committee is to advise the Compliance Officer and provide oversight in the implementation of the Compliance Program. The Committee benefits from the perspectives of individuals with varying responsibilities in the organization such as Department Heads and senior managers from Public Health, Mental Health, Human Resources, Information Technology, Department of Social Services and Genesee County Legislature.

The Compliance Committee is responsible for advising the Compliance Officer and assisting in the implementation of the adopted Compliance Plan.

The scope of the Compliance Committee's authority and responsibility includes:

- A. Identification of specific risk areas
- B. Annually assessing existing policies and procedures that address those risk areas and modifying them as needed
- C. Working with departments to develop or modify standards of conduct, policies and procedures to promote compliance with legal and ethical requirements
- D. Developing and evaluating appropriate strategies to promote compliance with the Compliance Program and detection of any potential violations
- E. Evaluation and approval of all Compliance Program initiatives, processes and documentation, and
- F. Receiving, reviewing, and recommending appropriate responses to reports of actual or potential non-compliance with applicable laws, regulations, Code of Conduct, and policies and procedures in coordination with the Compliance Officer and with the assistance of counsel as necessary
- G. Collaborate with the Compliance Officer in the development of the annual compliance work plan
- H. Monitor, evaluate and assess the content and effectiveness of training materials and work with the Compliance Officer to revise such training materials as necessary
- I. Designate Committee members and Committee Chairperson

The Compliance Committee shall meet on at least a quarterly basis, or more frequently if needed, to review the Compliance Program and activities. Meetings shall be scheduled for a time and location that allows for optimal participation and attendance by members. At the first meeting of each year Compliance Committee members and a Compliance Committee Chair shall be designated. Minutes shall be taken at all Compliance Committee meetings and include date, location, members present, agenda items, summary of reports and action/next steps.

The Genesee County Compliance Committee shall be comprised of the following:

Compliance Officer
Chairperson of the Human Services Committee of the Legislature
Assistant County Manager
Mental Health Director and/or Deputy Director
Mental Health Clinical Director
Mental Health Finance Program Specialist
Public Health Director
Public Health Director of Children with Special Needs
Public Health Administrative/Budget Officer
Human Resources Director and/or Deputy Director
Director of Information Technology
Department of Social Services Commissioner

The Chair of the Genesee County Compliance Committee shall be designated at the first meeting and shall serve as Chair for the duration of the year. The Compliance Committee has sole authority to designate the Chairperson. If at any time a designated member or Chairperson is unable to serve, notice shall be given to the Compliance Officer and a replacement shall be designated. The Committee may appoint ad hoc members, each to serve at the pleasure of the Committee, to assist and advise the Committee in carrying out this charter. While ad hoc members of the Committee are not entitled to vote on matters formally considered by the Committee, they shall be entitled to have a matter included on the agenda of any meeting of the Committee. The Compliance Committee shall designate the proper manner for calling meetings and the setting of agendas.

The Compliance Officer and Committee shall retain a direct line of communication with and a direct reporting responsibility to the Genesee County Legislature.

The Genesee County Compliance Committee Charter shall be reviewed annually at the first Compliance Committee meeting of the year. Necessary updates shall be incorporated and the Charter shall be adopted.

Mental Health Deputy Director Peter Mittiga is designated as Compliance Committee Chair for 2023.

Adopted by Compliance Committee 3/1/2023