

Building a Culture of Compliance and Ethics



Core Elements

1. Compliance standards (policies procedures and standards of conduct)
2. Dedicated compliance specialist & committee
3. Conducting training and education
4. Developing open lines of communication
5. Conducting internal monitoring and auditing
6. Enforcing standards through disciplinary guidelines
7. Promptly responding to detected issues, including corrective action
8. Non-Discrimination and Non-Retaliation



Code of Conduct

- ▶ Describes the Compliance Program
- ▶ Reflects the Health District's daily operations, core values, and overall organizational culture
- ▶ Separate from policies and procedures
 - Reflects the Health District's ethical attitude
 - Outlines the Health District's compliance and ethical aspirations
 - Serves as a resource



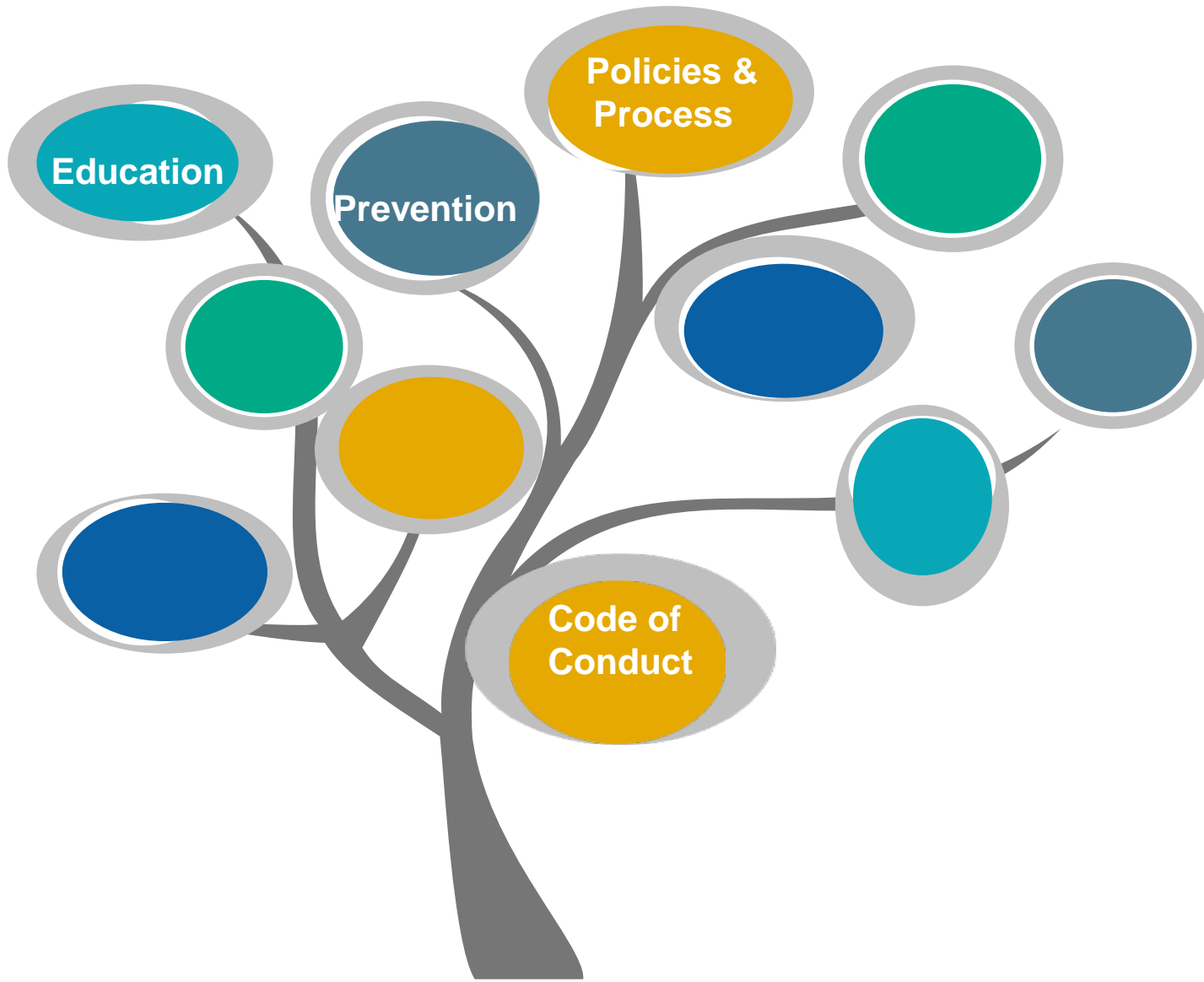
The Compliance Committee

- ▶ Compliance Ambassadors
- ▶ Ensures:
 - Appropriate policies and procedures are in place
 - Proper ethical standards are present and maintained in meeting applicable laws, rules, regulations
 - Monitoring and evaluation of compliance activities
- ▶ Supports the Senior Compliance Specialist in building the Compliance Program and measuring its effectiveness



Compliance Program Administration





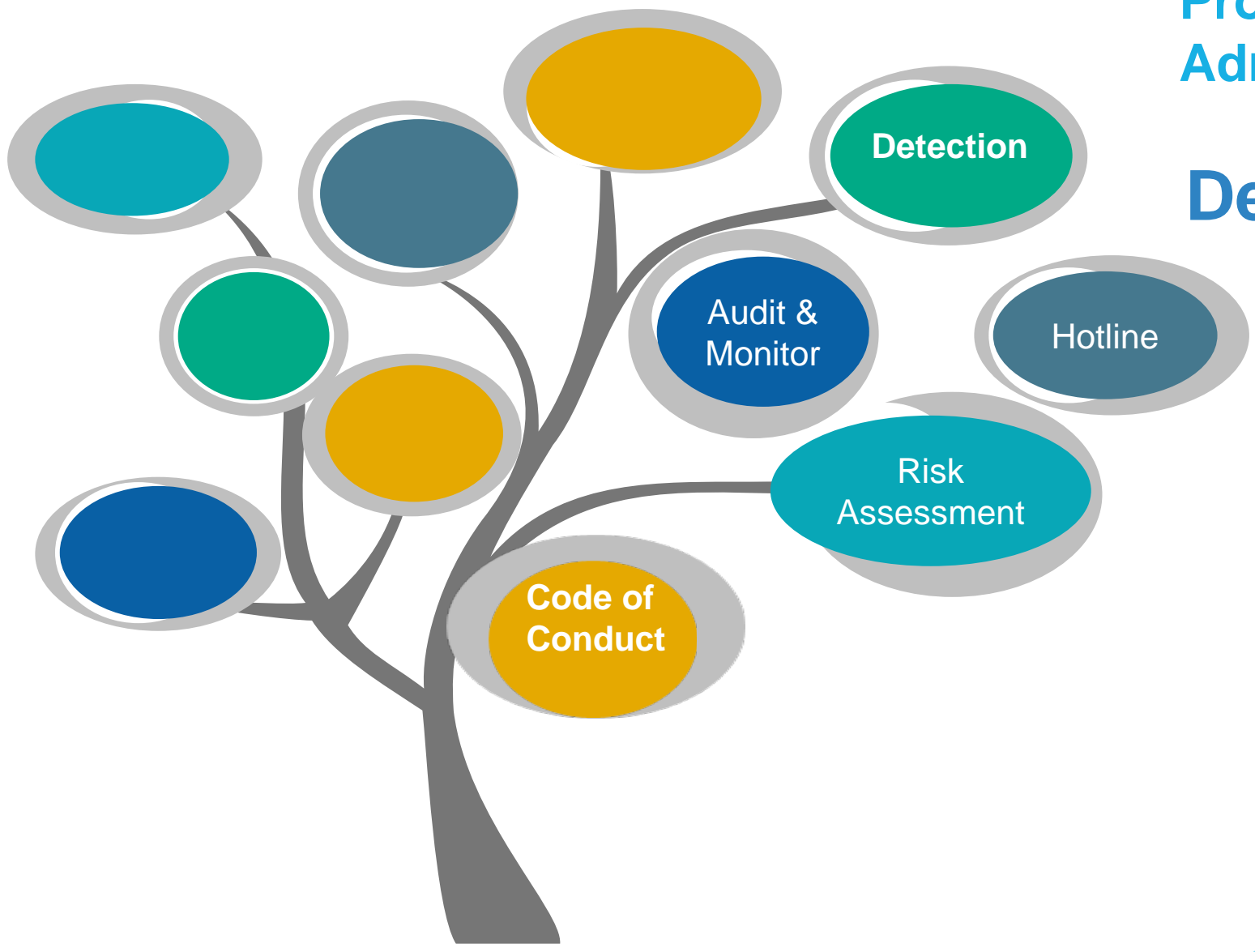
**Compliance
Program
Administration**

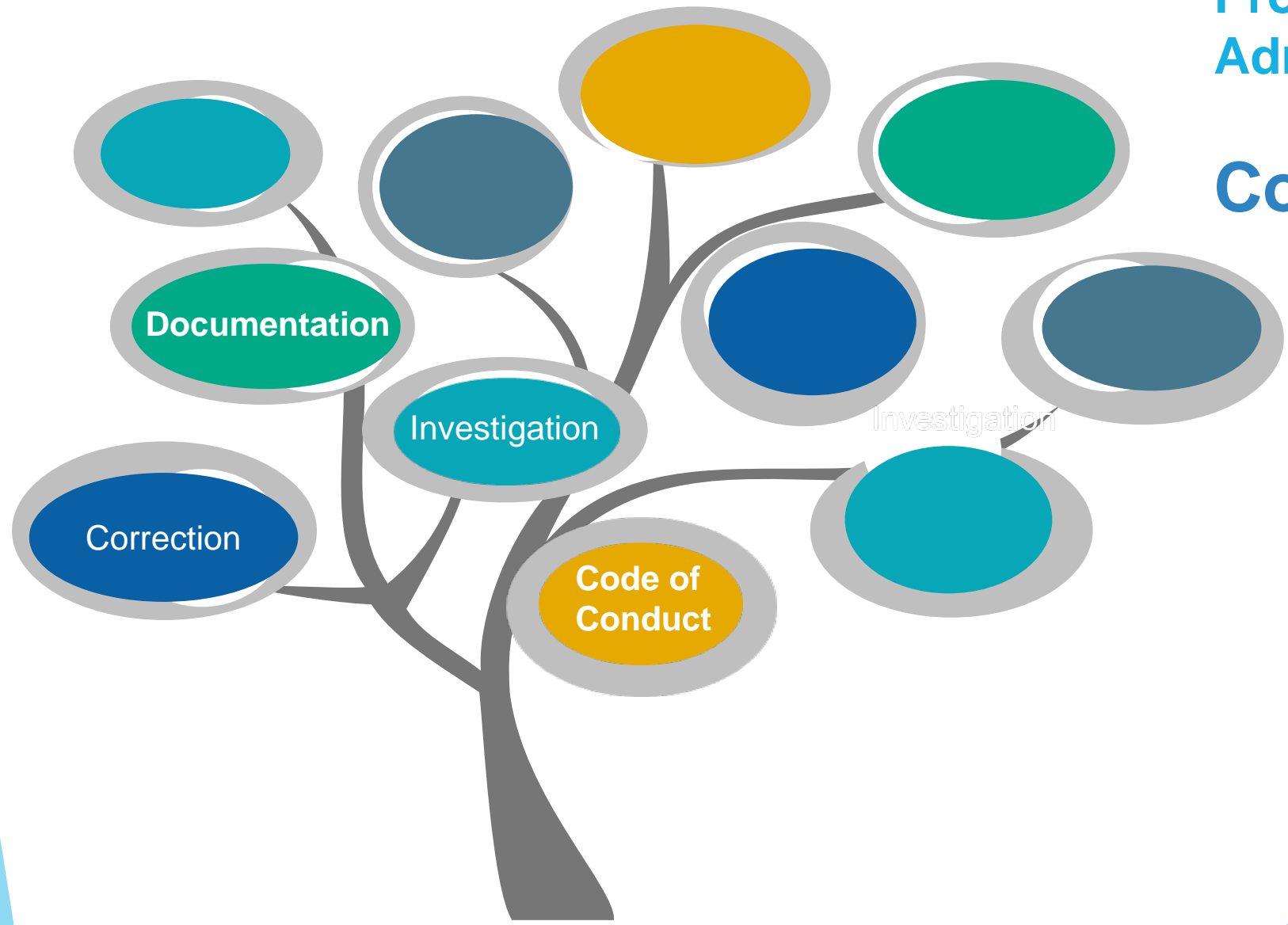
Prevention



Compliance Program Administration

Detection

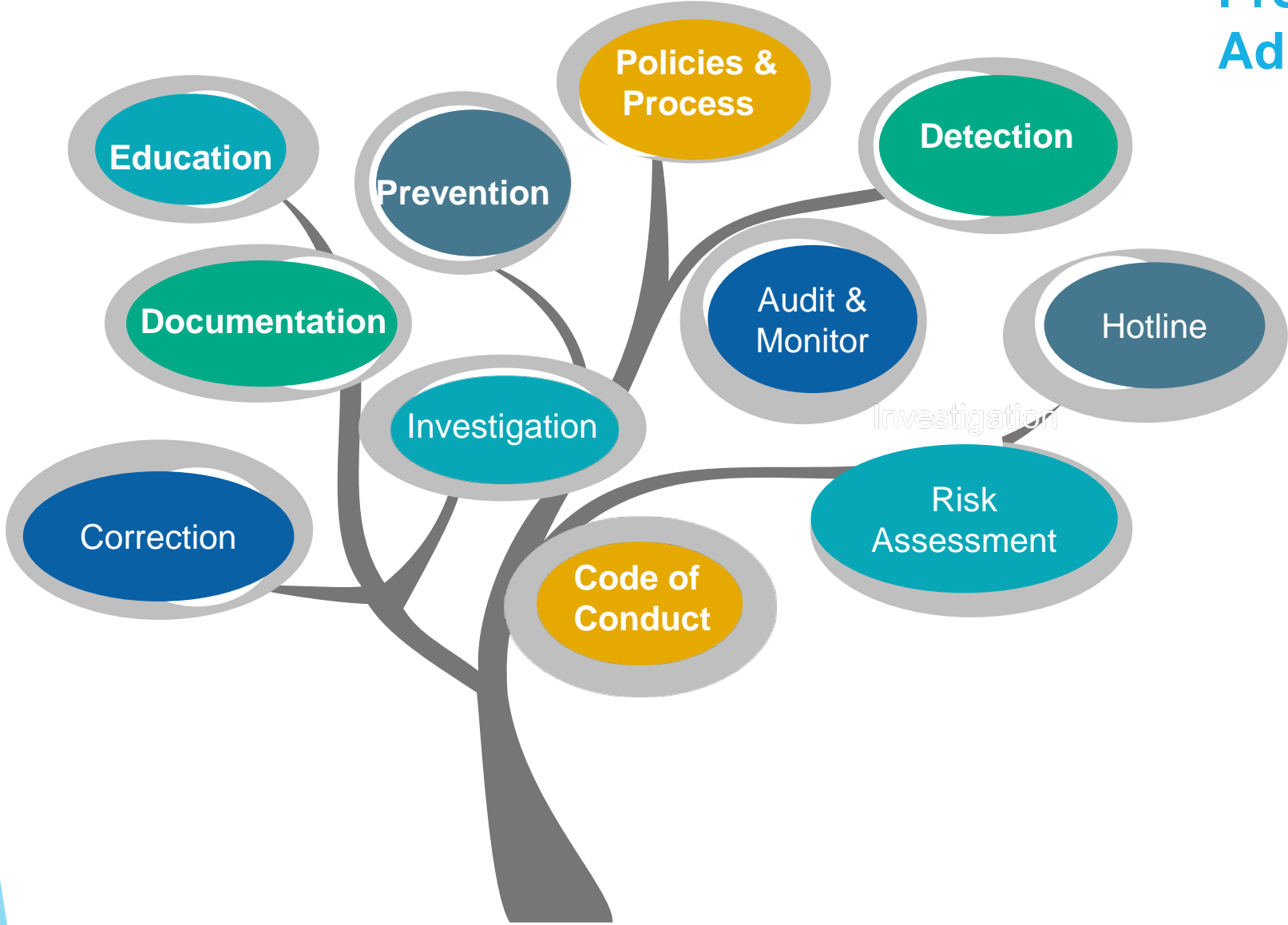




**Compliance
Program
Administration**

Correction

Compliance Program Administration





Leadership and Board Commitment

- ▶ How is This Measured?
 - Formal commitment to compliance
 - Active involvement
 - Empowerment



...it's a
team Sport

