



## 7 Elements of an Effective Compliance Program

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U.S. Department of Health and Human Service,  
Office of Inspector General , General Compliance  
Program Guidance, updated November 2023

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United States Department of Justice, Sentencing  
Guidelines, Evaluation of Corporate Compliance  
Programs, updated September 2024

# Board's Responsibility for Compliance

- The United States Sentencing Commission's Guidelines require that an entity's "governing authority shall be knowledgeable about the content and operation of the compliance and ethics program and shall exercise reasonable oversight with respect to the implementation and effectiveness of the compliance and ethics program."

# Element 1—Written Policies and Procedures

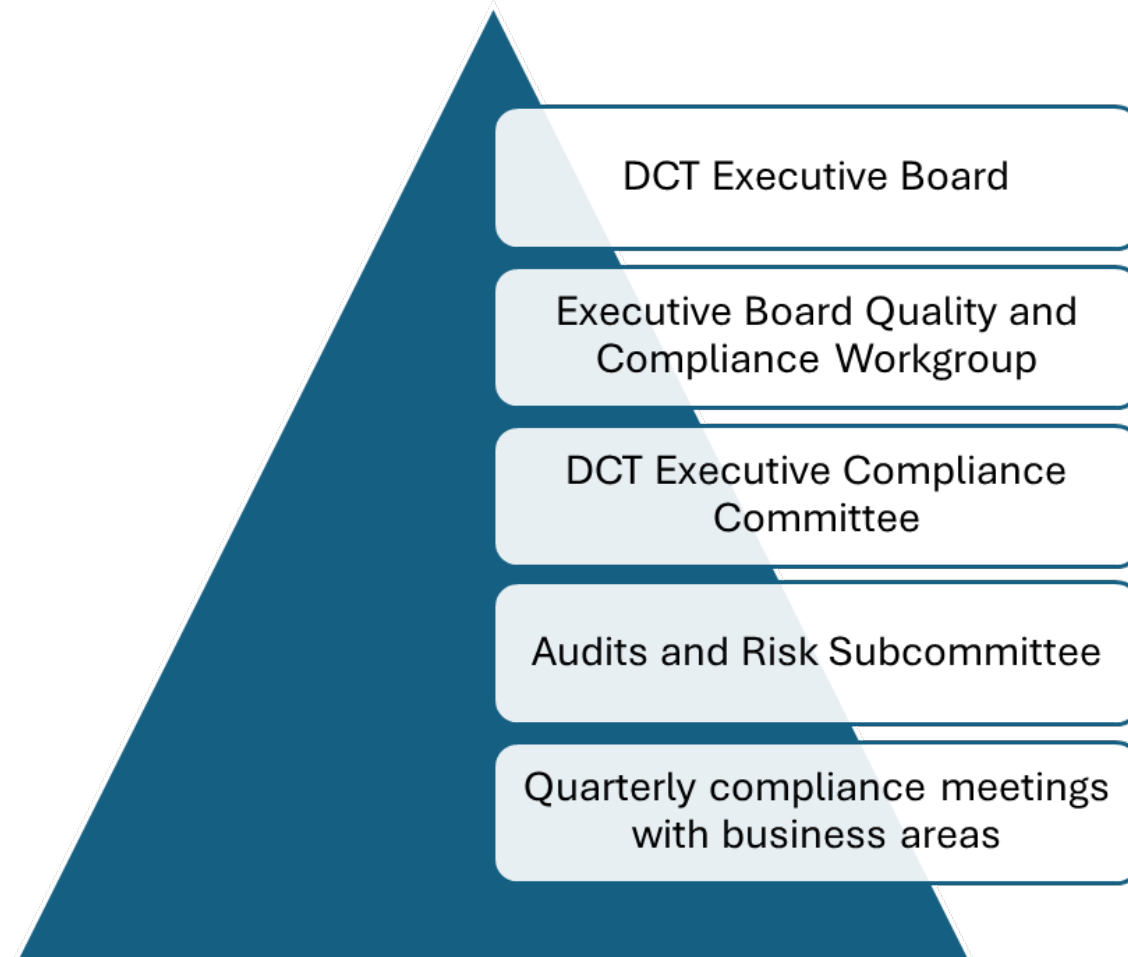


Policies are reviewed through committee every 2 years



992 current policies/procedures in effect

# Element 2—Compliance Leadership and Oversight



# Element 3—Training and Education

- Pathlore training management system
- Compliance, data security, and ethics trainings are through Minnesota Management and Budget (MMB)
- Opportunity for improvement: further integration of compliance into new employee orientation

# Element 4—Effective Lines of Communication



Promotion post-  
separation



Compliance month



Reporting lines

# Element 5—Enforcing Standards: Consequences and Incentives



Employee Investigations  
and Discipline Policy



Opportunity for  
improvement: Incentives



# Element 6—Risk Assessment, Auditing, and Monitoring

- Risk Assessment
  - Controls System Assessment Tool (CSAT)
  - DCT Risk Assessment
- Audits
  - 1 Deputy Director of Audits
  - 3 Auditors
- Monitoring = audits and reviews conducted within the service line

# Questions?