

ETHICS AND COMPLIANCE OFFICE: 2019 End of Year Report

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Ethics Education and Implementation

- Provided guidance on more than 125 conflict of interest/ethics questions
 - AskEthics email box
 - Procurement/Contracting process
 - Recruitment process
 - Inspector General investigations
- Conducted in person ethics training
 - Citizens managers during LEAD 365 classes
 - Vendors at IT Workshop (Lobbyist registration requirements)
 - Executive Leadership Team (Florida Code of Ethics)
- Administered mandatory Ethics Refresher and Attestation Course
 - Interactive online course
 - All employees completed statutory attestation of no-COI

Privacy Education and Implementation

- Privacy Officer
- Privacy Corporate Policy refreshed and revised
- > 35 Privacy Information Exchanges (internal management consultations)
- > 145 privacy inquiries answered
- HIPAA self- assessment

Corporate Policy Management

- Currently 44 Corporate Policies including the Code of Ethics, which contains the Standards of Conduct
- Treated as “living documents” with review process
- 16 were updated during 2019

Operational Compliance Governance Implementation

- Internal controls associated with the compliance certification process documented by OIA.
- Performed a quality assurance review of 2018 Certification responses with the Compliance Champions to identify any gaps in the data inventory.
- Completed the third annual compliance certification process and provided the 2019 Certification results to the Citizens Risk Steering Committee on 11-12-2019, attached as “A”

Division of Legal Services and Purchasing

ETHICS AND COMPLIANCE OFFICE:

- **Nancy Staff**, Director of Ethics and Compliance Officer, J.D., CCEP
- **Chuck Bowen**, Privacy Officer, J.D., CIPM, CIPP, and IAPP Privacy Law Specialist