
 <p>Corrections and Community Supervision</p> <p>DIRECTIVE</p>	<p>TITLE</p> <p>Functions - Office of Compliance Standards</p>		<p>NO. 6927</p>
			<p>DATE 04/16/2019</p>
<p>SUPERSEDES</p>	<p>DISTRIBUTION A</p>	<p>PAGES PAGE 1 OF 4</p>	<p>DATE LAST REVISED</p>
<p>REFERENCES (Include but are not limited to) Directive #0001, #2799, #6920, #6921, 6925</p>	<p>APPROVING AUTHORITY</p> 		

- I. **PURPOSE:** This directive sets forth the objectives, responsibilities, and functions for the Office of Compliance Standards. This Office is comprised of the Accreditation Program and the Bureau of Internal Controls.
- II. **HIERARCHY & STRUCTURE:** The Office of Compliance Standards aligns under the Deputy Commissioner for Correctional Industries, Compliance Standards, & Diversity. Direct supervisory responsibility is assigned to the Assistant Commissioner for Correctional Industries and Compliance Standards. Within this structure, supervisory responsibilities are as follows:
 - A. Accreditation Program: The Assistant Commissioner for Correctional Industries and Compliance Standards is responsible for direct administration and operations associated with Department of Corrections and Community Supervision (DOCCS) Accreditation Program.
 - B. Bureau of Internal Controls: The Director of the Bureau of Internal Controls is responsible for direct administration and operations of the entire bureau. In this role, the Director has also been designated as the Department's Internal Control Officer (ICO), Co-Lead LEAN Deployment Manager, Policy/Directive Management Chief Administrator, and Employee Suggestion Program DOCCS review Chairperson.
- III. **FUNCTIONS & RESPONSIBILITIES:** The two functional areas within the Office of Compliance Standards are described below:
 - A. Accreditation Program Office: The purpose, policy, definitions, and procedures associated with DOCCS Accreditation Program are outlined in Directive #6921, "Accreditation Program." Accreditation by the American Correctional Association (ACA) offers facilities, Community Supervision, Board of Parole, and correctional units (e.g., Training Academy, Food Production Center, Central Office, Division of Correctional Industries) the opportunity to evaluate their operations against accepted National Expected Practices and, when appropriate, to remedy deficiencies and upgrade the quality of programs and services.
 - B. Bureau of Internal Controls (BIC): (See Directive #6920, "DOCCS System of Internal Controls.") The Bureau of Internal Controls is comprised of the three sub-units that work together to help provide **reasonable assurance** to the Commissioner, Executives, and Management that Departmental objectives relating to operations, reporting, and compliance are successfully achieved. The individual units within BIC are described as follows:

1. Internal Controls Unit:

- a. In collaboration with DOCCS Executives and Division Heads, facilitating the compilation and completion of the annual "Internal Control Summary and Certification" as required by DOB [Budget Bulletin B-350](#);
- b. Assisting DOCCS Central Office and Division of Correctional Industries Business Units with the completion of the annual Certification of Internal Controls Over the Payment Process, as required by OSC Accounts Payable Advisory #28, "Certification of Internal Controls over the Payment Process";
- c. Monitoring of the operations of the local Internal Control Committees via review of the required quarterly Internal Control Review and Activity Reports;
- d. Assisting DOCCS Executives and designated Subject Matter Experts with compiling significant deficiencies as reported through the wide variety of Department audit and inspection activities into one centrally monitored database, and then monitoring corrective actions for completion and compliance (Audit & Inspection Protocol);
- e. Assisting the Commissioner, Executive Team, and the Special Counsel for Ethics, Risk, and Compliance with the facilitation of DOCCS Enterprise Risk Management (ERM) efforts;
- f. Assisting the Director in the administration of the Internal Control Officer role as defined by the Business Service Center of the Office of General Services in the Statewide Financial System security protocols;
- g. Managing the Department's evaluation process for the Civil Service Employee Suggestion Program, including submission of analyses and recommendations from Departmental subject matter experts regarding the suggestions, and maintenance of any related records;
- h. Coordinating External Audit Activities, including Office of the State Comptroller (OSC) audit activities and serving as the External Audit Liaison between auditors and Department staff to help ensure that DOCCS is timely and responsive throughout the audit process. Also, providing assistance to Departmental staff in the preparation of appropriate audit responses, including any preliminary findings, draft audit reports, and final audit reports. (See Directive #2799, "Responses to External Audits.");
- i. Perform site visit activities to support internal controls and review internal control activities across the agency. Specifically, with Internal Controls Committee (ICC) Managers and/or Executives;
- j. Maintenance of relevant Internal Controls resources for accessibility by DOCCS staff, such as the Statewide Internal Controls Shared Drive or other systems as they may be developed;

NOTE: In accordance with the implementation of ITSM 2.0 by the Office of Information Technology Services, requests for access to the Internal Controls Shared Drive must be processed as a User Upgraded Access Request by the facility, area office or Division/Unit CSC or DPL. Internal Control Shared Drive approval requests should continue to include a brief justification as to the employee's need for access to the shared drive to assist with the required review and approval.

- k. Conduct relevant internal controls related training across the agency as deemed necessary; and
 - l. Regular communication and collaboration with the Internal Audit Unit to review their reported findings, recommendations, and/or any identified functional vulnerabilities, in order to assist Agency Managers, if needed, with self-assessment activities and corrective action plan development and monitoring.
2. **Process Improvement (LEAN) Unit:** (See Directive #6925, "Continuous Process Improvement (LEAN).") Is responsible for assisting all functional areas within DOCCS in striving towards continuous process improvement and compliance with DOCCS LEAN goals and expectations as summarized below:
- a. Working with Agency Executives, Managers, and staff across all levels of the Department to integrate and execute the Office of LEAN process improvement methodology, including In-Situ visual process trackers;
 - b. Compiling data and outcomes from DOCCS LEAN projects for any required reporting to the Governor's Office of LEAN or to the Division of the Budget; and
 - c. Conduct relevant process improvement (LEAN) related training across the agency as deemed necessary.

NOTE: Process improvement methodology is critical with regard to risk mitigation efforts as the risk or consequences of not improving the process, or of the process failing, are considered.

3. **Policy Management Unit:** In accordance with the provisions of Directive #0001, "Introduction to the Policy and Procedure Manual," this Unit is responsible for:
- a. Assisting the Commissioner, Central Office Executive staff, and the Chairperson of the Board of Parole with the development, revision, publication, and distribution of Policy & Procedure Manual Directives, which includes:
 - (1) Facilitating the annual review of all DOCCS directives, which includes the review of any associated regulations and/or ACA Expected Practices, maintenance of the associated electronic and physical history files, and management of the associated policy vetting process (i.e.; clearance comments review); and
 - (2) Managing the review and revision of forms that are attached or linked to a directive. This is accomplished in close collaboration with the Division of Industries Elmira Print Shop and the form content Subject Matter Experts.
 - b. Assisting DOCCS Subject Matter Experts, Office of Counsel, and Board of Parole Counsel with the processing of directive associated regulation (Title 7 & Title 9 of the New York Codes Rules and Regulations) changes as deemed necessary, and in accordance with State Administrative Procedure Act (SAPA) protocols.
 - c. Conducting relevant policy management related training for designated reviewers and/or stakeholders as deemed necessary.

4. **BIC Contact Information:**

- a. The main telephone line: (518) 436-7886, Ext. 5030
- b. Outlook addresses as follows:
 - (1) Internal controls or policy management communications:
DoccsBureauIntControl@doccs.ny.gov
 - (2) Process Improvement (LEAN) communications:
LEAN@doccs.ny.gov