



FirstNet™

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FirstNet Compliance Program for Finance Committee



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September 16, 2014

FirstNet Compliance Program



Because FirstNet faces compliance risks of both a government agency and commercial-like entity, FirstNet has been implementing a robust “commercial-like” compliance program to supplement existing federal compliance requirements

- § Commercial-like characteristics pursuant to enabling legislation (e.g., governing Board, ability to contract with public, self-funding obligation)
- § Startup environment
- § New, growing workforce
- § Rapid hiring ramp
- § Commercial employees unfamiliar with government-related compliance
- § Government employees unfamiliar with commercial practices
- § New, undefined governing statute
- § Untested application of existing laws to a hybrid organization

Results in more complex risk profile than either established government agency or traditional commercial entity

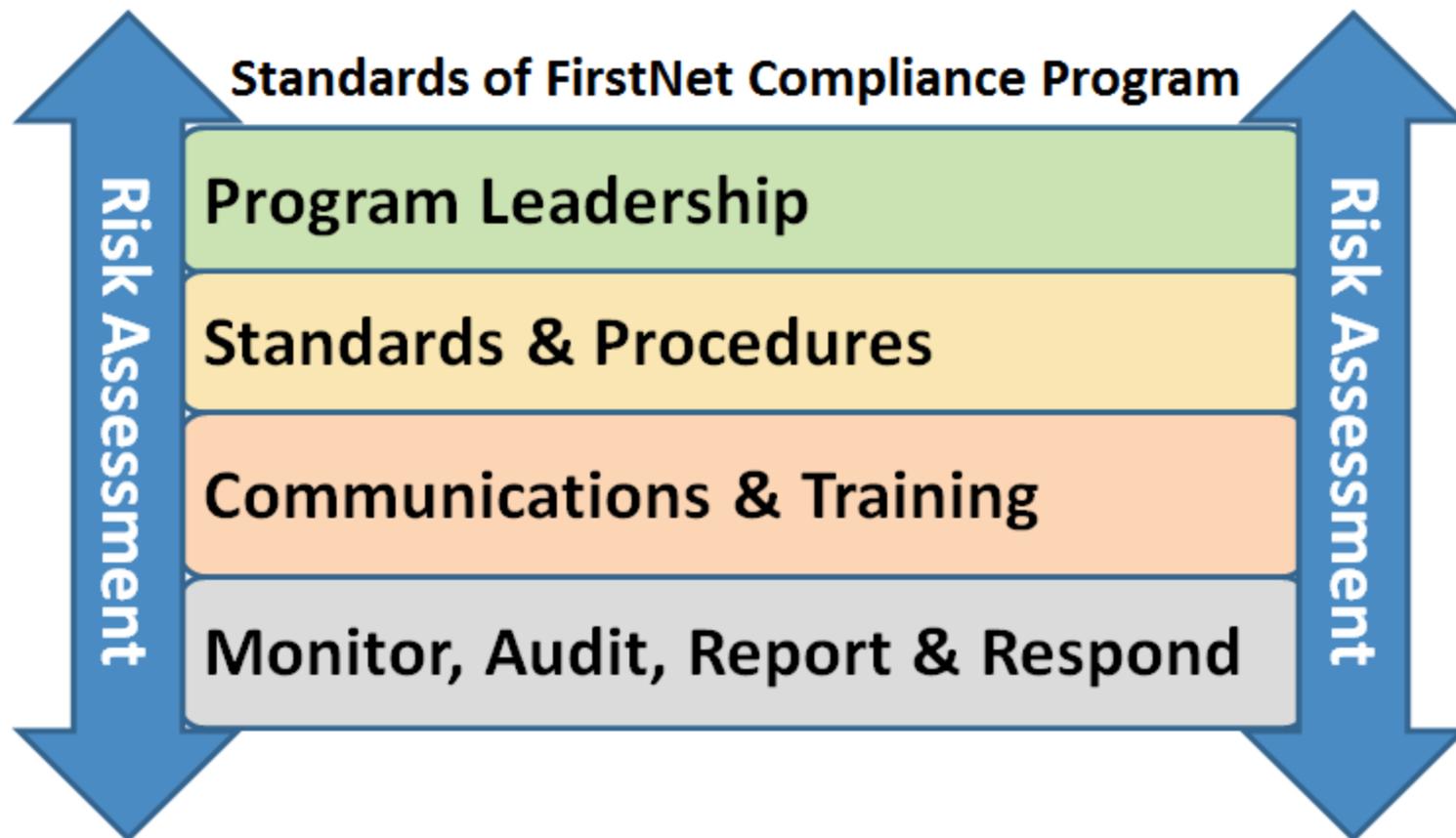
FirstNet Compliance Program



§ FirstNet's Compliance Program has 3 main goals:

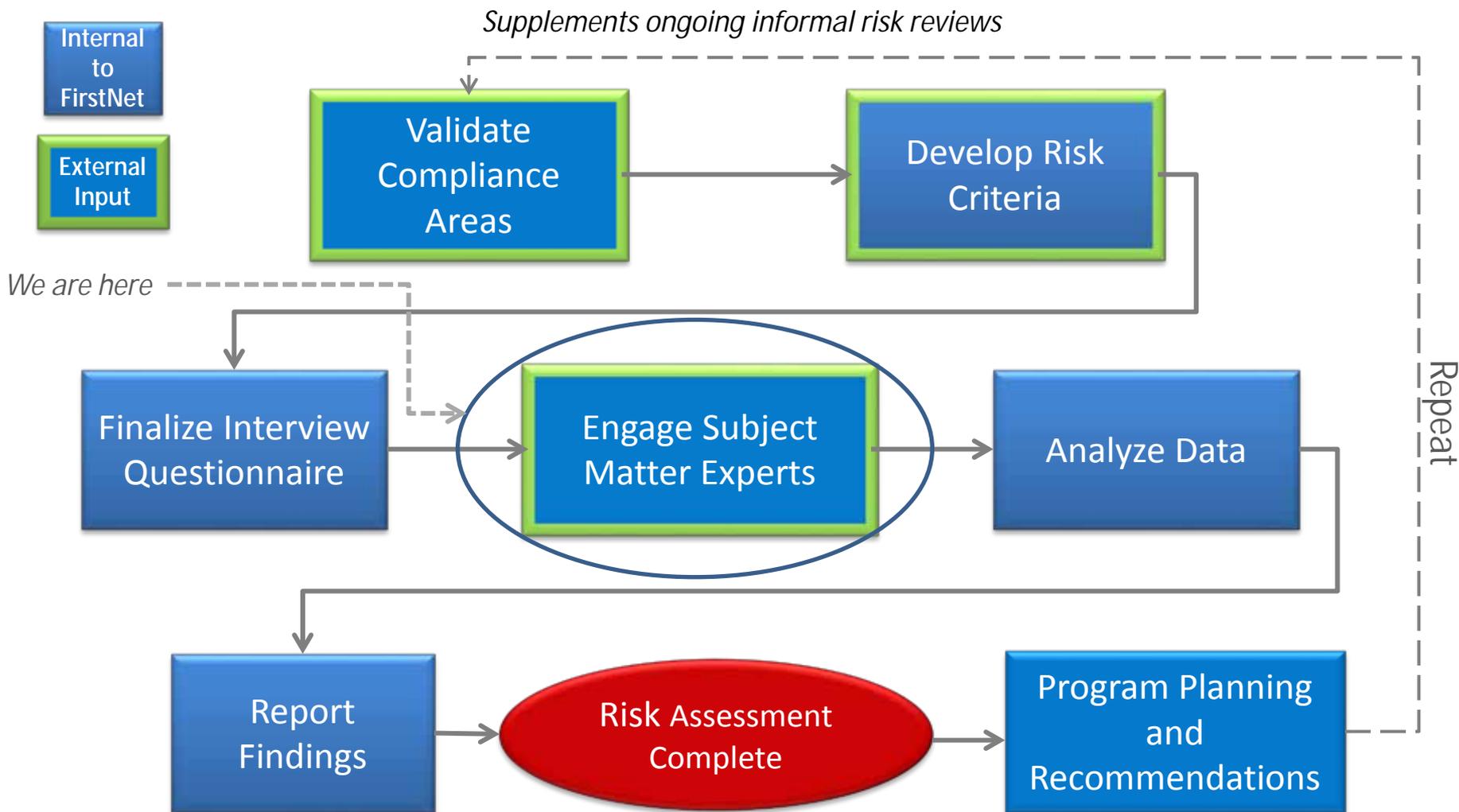
1. Foster the **highest ethical standards** and a commitment to compliance with the law and applicable policies amongst FirstNet personnel consistent with FirstNet ethical values
2. Be designed to be effective in **preventing, detecting** and **appropriately reporting** and **addressing** any allegation of misconduct and violations of law and policy by FirstNet personnel; and
3. **Comply** with and incorporate all applicable laws and government requirements

Compliance Program Overview



Incorporates elements of both US Sentencing Guideline and Government Practice

Risk Assessment Process



Appendix



Compliance Program Leadership



In addition to, not in lieu of DOC policies, procedures, and oversight

FirstNet Board



Finance Committee



FirstNet Compliance Committee



Compliance Officer

Standards and Procedures



In addition to, not in lieu of DOC policies, procedures, and oversight

§ **FirstNet Policies** – Implementing and under development

§ **FirstNet Procedures** – Implementing and under development

§ **FirstNet Governance and Oversight Meetings** – Implemented

§ **DOC Requirements and Ethics Office Coordination** – Implemented

§ **FirstNet Code of Business Ethics** – Planning

Communications and Training



In addition to, not in lieu of DOC policies, procedures, and oversight

- § **DOC and Government-wide Training – Implemented**
- § **FirstNet-specific Training – Implementing and under development**
- § **DOC Communications – Implemented**
- § **FirstNet-specific Communications Plan – Implementing and under development**
- § **Training Tracking and Reporting – Implementing and under development**

Monitor, Audit, Report, and Respond



In addition to, not in lieu of DOC policies, procedures, and oversight

- § DOC Reporting Channels – Implemented
- § DOC Whistleblower Protection Process – Implemented
- § Subject to DOC and OIG Investigation Protocols
- § Subject to DOC Disciplinary Guidelines – Additional FN measures being implemented
- § FirstNet-specific Reporting Channels – Implementing and under development
- § FirstNet Desk Reviews and Internal Audits – Planning