

EXHIBIT A

ANNUAL COMPLIANCE QUESTIONNAIRE (Employees of the Departments of Health, Hospitals and Mental Health Only)

The Compliance Questionnaire is a critical part of the Corporate Compliance Program. It requires an employee of the County of Rockland to verify that the employee is aware of and in compliance with the guidelines of the Program. Employees will be asked to complete the questionnaire on an annual basis. If during the year an employee has a change in circumstances that would cause the employee to change his or her response to any question in this questionnaire, the employee should promptly notify the CO.

Any doubt as to whether a question should be answered in the affirmative should be resolved in favor of disclosure, giving the reason why the employee believes that the situation disclosed does not constitute a conflict of interest or a questionable payment, as the case may be.

The following is a brief explanation about the questionnaire:

- Parts A through C of this questionnaire are designed to determine the nature and extent of any outside interest an employee may have that might constitute a conflict of interest with the business and affairs of the County of Rockland.
- Part D is designed to determine whether any payments were improperly authorized or made from County of Rockland funds or assets in violation of law or contrary to the ethical standards of business conduct adopted by the management of the County of Rockland.
- Part E is designed to discover any weaknesses or deficiencies in the County of Rockland's internal accounting controls, and whether such controls are sufficient to reasonably assure (i) that transactions were executed in accordance with management's authorization and accurately recorded in the County of Rockland's financial statements, and (ii) to maintain accountability for assets of the County of Rockland.
- Part F is designed to assist the County of Rockland in discovering any existing or potential legal problems regarding the County of Rockland's operations or employees.

The terms used in the questionnaire are defined as follows:

- **Competitor:** A person who offers or sells products or services in competition with the County of Rockland.
- **Confidential Information:** Any information concerning the County of Rockland's business acquired by an employee in the course of employment that is not available to the public, including, without limitation, information obtained from any proprietary document or another employee of the County of Rockland and to which a reasonable person would attach importance in dealing or competing with the County of Rockland.

- **Family:** Includes an employee and his or her spouse, parents, siblings, and children, as well as the employee's parents-in-law, siblings-in-law, nieces and nephews, and any person living in the employee's household.
- **Own:** To have an ownership interest held by an employee or a family member, whether directly or indirectly, such as the beneficiary of a trust.
- **Person:** Includes an individual, firm, partnership, trust, corporation or other form of entity.
- **Supplier:** Any person who sells, leases, rents, agrees to furnish, or has sold, leased, rented or agreed to furnish any products, merchandise, goods, materials, supplies, machinery, equipment, real estate, credit or insurance to, or who has performed any services (professional or otherwise) for or on behalf of the County of Rockland.

PART A. Ownership, Entertainment, Gifts, Loans, Etc,

1. During the past year, did you or any member of your family own, directly or indirectly, any interest whatsoever in, or participate in the profits or income of, any supplier or competitor?

Yes No

2. During the past year, did you or any member of your family receive or were you or they furnished, directly or indirectly, with any compensation, entertainment or gifts in excess of \$25 retail value per vendor, or any credits, loans or cash of any amount, or anything else of value from any supplier or competitor?

Yes No

3. Is any member of your family an employee of the County of Rockland?

Yes No

[If your answer to any of the questions in Part A is yes, indicate the number of the question on a separate paper attached to this questionnaire and provide the name and address of each such supplier or competitor, the name of the person owning such interest and/or the nature and extent of such income, money or thing of value received, entertainment furnished and circumstances under which such transactions or events occurred. If a member of your family is an employee of the County of Rockland, please provide such person's name, relationship to you and place of employment.]

PART B. Employment Status

1. During the past year, were you an owner, officer, director, employee or consultant of, or otherwise employed or retained in some other capacity by or affiliated with, any supplier or competitor, or was any member of your family an owner, officer, director, or employee or consultant in a decision or policy-making capacity with any supplier or competitor?

Yes No

2. During the past year, have you accepted compensation in cash or property from persons other than the County of Rockland for (i) services for which you were being paid by the County of Rockland, or (ii) services performed by you during your County of Rockland working hours?

Yes No

[If your answer to any of the above questions is yes, indicate the number of the question on a separate paper attached to this questionnaire and state the full details, including name and address, of such persons and the nature of the relationship and the amount and kind of any remuneration received.]

PART C. Use of Property or Confidential Information

1. During the past year, did you use or reveal confidential information concerning the County of Rockland or its business, or know of any other person who used or revealed confidential information concerning the County of Rockland or its business, except (i) in the course of your employment by the County of Rockland or (ii) to other employees of the County of Rockland as required by virtue of your employment, without first obtaining specific authorization from your supervisor?

Yes No

2. During the past year, did you use, permit others to use or have knowledge of others' use of, funds, employees, materials or equipment of the County of Rockland for personal purposes?

Yes No

[If the answer to either of the above questions is yes, indicate the number of the question on a separate paper attached to this questionnaire and state the full details, including the name and address of the recipient of the information or property and the information or property involved.]

PART D. Payments

During the past year, did you pay, authorize or otherwise have knowledge of the following kinds of payments made by or on behalf of the County of Rockland:

1. Political contributions directly or indirectly made from County of Rockland funds, or the furnishing of County of Rockland assets, facilities or services to any political party, politician or candidate for public office?

Yes No

2. Payments to government officials and personnel from County of Rockland funds, either directly or indirectly, (a) through the reimbursement of purported business expenses to any employee, or (b) through an independent intermediary, in an effort to procure special favors, advantages or benefits for the County of Rockland? (Note: Any such payments made to government officials or personnel are presumed to be made to influence the exercise of their judgment or discretion in disposing of matters on behalf of the governmental body involved.)

Yes No

3. Payments directly or indirectly made from County of Rockland funds or the furnishing of a County of Rockland asset or service for the purpose of improperly influencing any person's conduct in connection with the purchase of County of Rockland's products or services or the referral to the County of Rockland of patients?

Yes No

4. Payments or any other form of remuneration directly or indirectly received for the purpose of influencing a County of Rockland employee's conduct in connection with the purchase of goods or services from a supplier or the making of a patient referral to a supplier?

Yes No

[If your answer is yes, indicate the number of the question on a separate paper attached to this questionnaire and state the full details of the questionable payment, including the date, nature (i.e., cash, services or furnishing a corporate asset, etc.), the recipient, the person who authorized the payment, and the reasons and circumstances under which the payment was given.]

PART E. False Records; Statements to Accountants

1. Do you know of or have reasonable grounds to suspect any instances where a transaction may not have been properly recorded on the County of Rockland's books, or where a transaction was not recorded at all?

Yes No

2. Do you know of or have reasonable grounds to suspect any instances where supporting documents to a transaction were altered or falsified to disguise the true purpose of the transaction?

Yes No

3. Do you know of or have reasonable grounds to suspect any instances where the County of Rockland's internal accounting control procedures were circumvented or where transactions were handled in what seemed to be an extraordinary or unusual manner?

Yes No

4. Do you know of or have reasonable grounds to suspect any instance where the County of Rockland, or any person acting on behalf of the County of Rockland maintained a bank account for or on behalf of the County of Rockland in a name other than in the County of Rockland's name?

Yes No

5. Do you know of or have reasonable grounds to suspect any County of Rockland bank account whose existence was not reflected in the County of Rockland's books and records?

Yes No

6. Do you know of or have reasonable grounds to suspect any instance where an internal auditor or accountant or a representative of the County of Rockland's independent accountants has been told by an officer or employee of the County of Rockland a materially false or misleading statement or omitted to state any material fact necessary in connection with the preparation or examination of the County of Rockland's financial statements?

Yes No

[If the answer is yes to any of the above questions, state on a separate paper attached to this questionnaire the full details of the instance, including the nature of the transaction and the individual(s) involved.]

PART F. Certification

I hereby certify that I have read and understand the Corporate Compliance Program and that the answers given in response to this questionnaire are complete and accurate to the best of my knowledge.

Type or Print Name

Position

Signature

Department

Date

Employee Number (SS#)