
Compliance That Protects: Why Small Agencies Can't Afford to Skip It

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Area Agency on Aging 3, Ohio
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Introduction

Serve 7 counties in NW Ohio

Total population of our region is approximately 360,000

23% total population is over age of 60

Older American Act, Medicaid Waiver, Federally-funded Transportation and Health Care Contracting

Launched Agency-wide Compliance Program January 2024

What are the Benefits

Promotes consistency

Increase efficiencies

Reduces legal and regulatory risks

Protects the organization's reputation

Encourages ethical behavior

Promotes continuous improvement

Additional business opportunities

Initial Challenges

Lack of identified
department responsible
for overseeing
compliance measures
agency-wide.

Limited resources to
fund compliance specific
positions

Programs were siloed.
Requirements
approached as program
specific rather than
agency-wide

Multiple funding sources
with varying
requirements

Policies
and
Procedures

Staff
Training

Internal
reporting

Internal
audits

Getting started:

Seven Elements of an Effective Compliance Program

Office of Inspector General Guidance

Leadership and
Oversight

Lines of
Communication

Policies and
Procedures

Training and
Education

Risk Assessment,
Internal Auditing and
Monitoring

Responding to
Detected offenses
and developing
Corrective Action
Initiatives

Enforcing Standards:
Consequences and
Incentives

LEADERSHIP AND OVERSIGHT

- Develop and implement a comprehensive compliance program
- Promote accountability among employees for compliance with applicable federal, state, and local laws and regulations
- Coordinate program audits conducted through contracted partners.
- Coordinate timely responses to regulatory and other external agencies
- Monitor compliance with regulatory requirements and effectiveness of policies and procedures

LINES OF COMMUNICATION

- Create communication pathways that allow the dissemination of education and regulatory information
 - Open Door policies for good faith reporting, process for investigation and resolution. Prohibit non-retaliation
 - Conduct meetings of the Agency's Compliance Committee, no less than on a quarterly basis
 - Provide quarterly updates on agency compliance matters to Board of Directors
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POLICIES AND PROCEDURES

- Provide guidance on policy development
- Implement annual policies and procedures review process
- Provide oversight of the policy process and maintenance of policy manual

TRAINING AND EDUCATION

- Oversee the completion of compliance trainings by new employees
 - Facilitate completion of annual compliance trainings by existing employees
 - Oversee the completion of compliance trainings by volunteers and Board of Directors
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RISK ASSESSMENT, INTERNAL AUDITING AND MONITORING

- Develop and manage agency-wide Privacy Program
- Facilitate annual Risk Assessment to identify trends and areas of risk
- Completion of internal program audits through routinely scheduled monitoring
- Evaluate the overall culture and the performance of the Compliance Program
- Facilitate continuation of external accreditations

RESPOND TO DETECTED OFFENSES AND DEVELOP CORRECTIVE ACTION INITIATIVES

- Conduct timely investigations of allegations of noncompliance and provide guidance on corrective actions
 - Provide recommendations for corrective actions and improvement of ethical conduct
 - Identify and remediate noncompliance through proactive review
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ENFORCING STANDARDS: CONSEQUENCES AND INCENTIVES

- Promote the agency compliance program and regulations, policies and procedures, and consequences of noncompliance
 - Develop and promote compliance incentive opportunities
 - Promote awareness of regulations, policies and procedures, and regulatory requirements
 - Promote accountability and consistent discipline
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Resources

Office of Inspector General

[General Compliance Program Guidance](#)

[Measuring Compliance Program Effectiveness](#)

Compliance Certification

[Health Care Compliance Association](#)

Presenter Info

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