



**FirstNet**<sup>TM</sup>

[www.firstnet.gov](http://www.firstnet.gov)

# 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

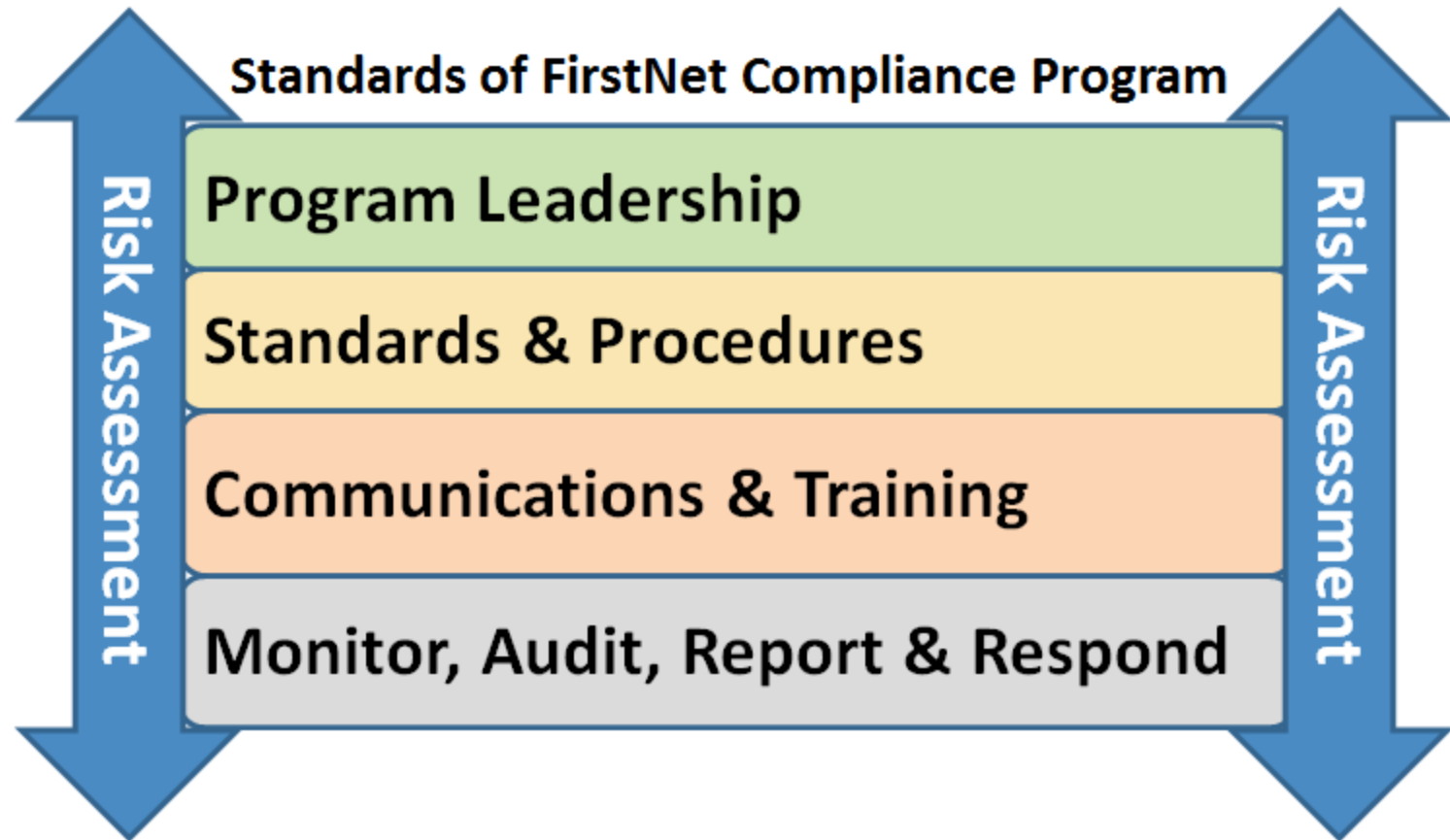


§ FirstNet's Compliance Program has 3 main goals:

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



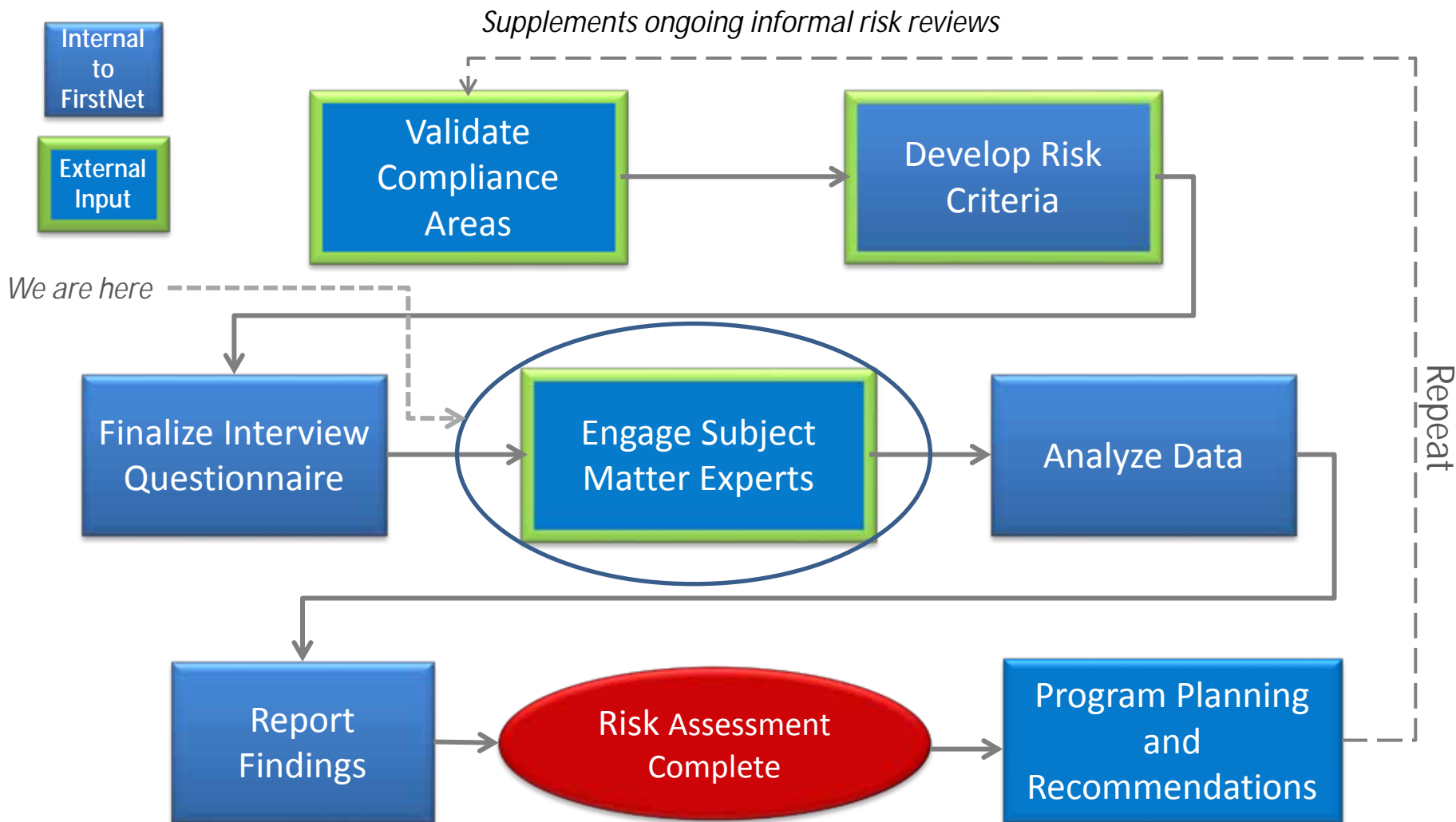
# Compliance Program Overview



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