

# Jefferson County Commission



# COMPLIANCE FRAMEWORK

December 2024

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# JeffCo Way Compliance Framework

## Purpose and Background

Jefferson County Commission (JCC) is proud of our recent compliance performance and the positive reputation for compliance that exists with our employees and community. Our commitment to compliance is a key part of who we are and how we work. We believe that a robust culture of compliance not only safeguards our reputation and ensures legal adherence, but also fosters trust among our customers, employees, and partners.

This framework represents our strategic approach to promoting ethical behavior, proactive risk management, and continuous improvement across all levels of our organization. It contains a section for each element of the Compliance Program. In each section, you will find:

- Roles and responsibilities
- References to Rules and Administrative Orders (AOs)

The final section of the framework describes how we periodically evaluate and improve the Compliance Program.

We encourage all employees to review this document to better understand the responsibilities they hold in partnership with the Compliance Office. Employees must be aware of the structure of the Compliance Program, which touches everyone throughout the County. By embedding compliance into our daily operations and decision-making processes, we aim to uphold the highest standards of integrity and accountability, creating a resilient and responsible business environment.

## Elements of Our Compliance Program

Although Jefferson County Commission does not fall under the Department of Justice's (DOJ) Federal Sentencing Guidelines, the JCC Compliance Program is aligned with the [seven elements of an effective compliance and ethics program](#) and incorporates the [DOJ's 2023 Evaluation of Corporate Compliance Programs guidance](#).

Department of Justice's  
**Seven Elements  
of an Effective  
Compliance Program**

Communication  
and Training

Program Governance  
and Resources

Enforcement  
and Discipline

Risk  
Assessment

Investigations  
and Response

Policies and  
Procedures

Monitoring  
and Auditing

**JCC's Compliance Program is designed under four main elements.**

Leadership,  
Oversight,  
and Culture

01

- Compliance Office
- Compliance Partners
- Values and the JeffCo Way
- Culture of Compliance
- Code of Ethical Behavior

Rules, AOs,  
and SOPs

02

- Effective AO and Rule Communication
- Business Process Optimization Assessments

Communication  
and Engagement  
Initiatives

03

- Two-Way Communication
- Voice Concerns
- Training Programs
- Awareness Campaigns

Response and  
Remediation

04

- Workplace Investigation Process
- Timely Response
- Corrective Action Recommendations

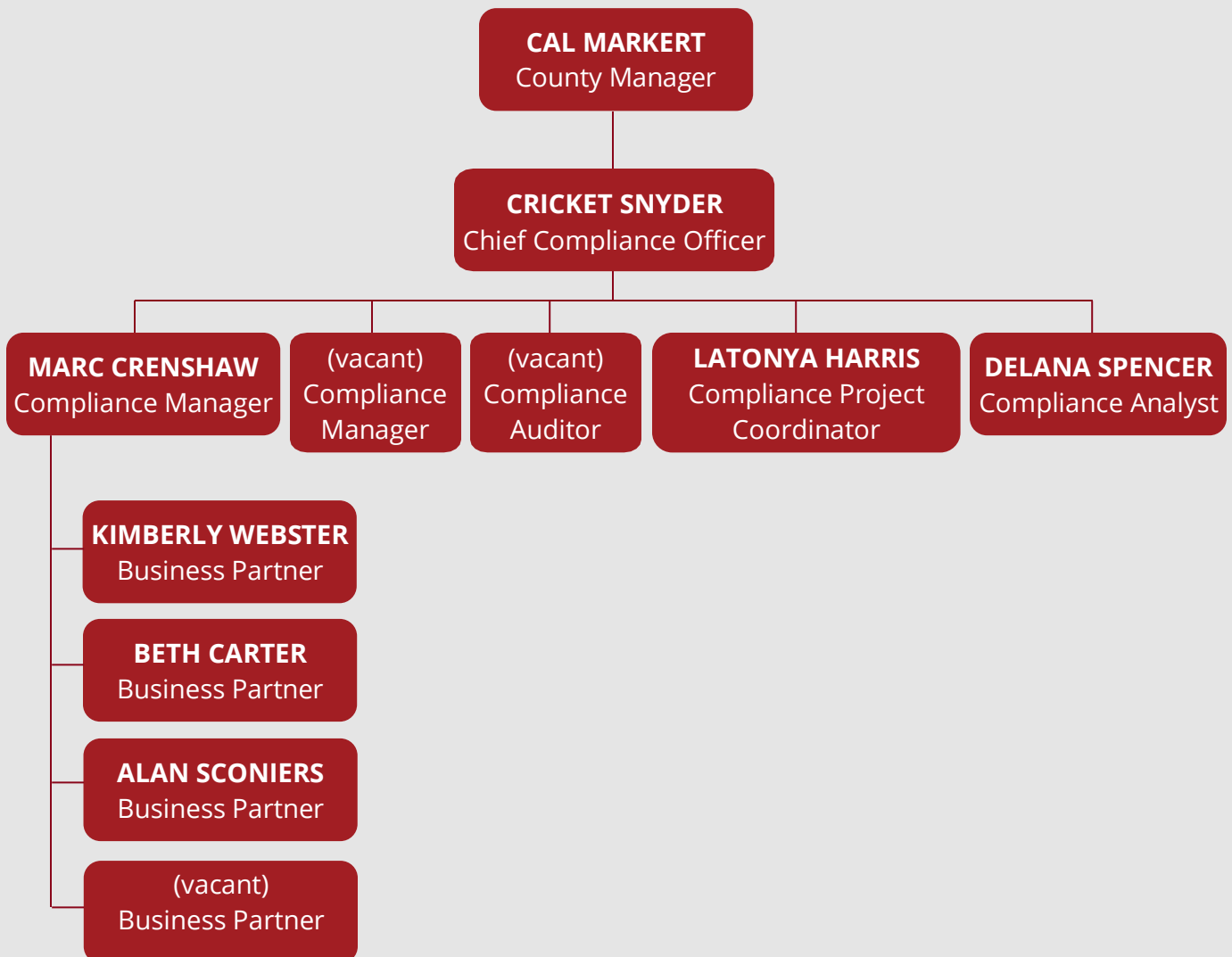
## Leadership, Oversight, and Culture

Jefferson County Commission maintains clear lines of accountability for compliance responsibilities and provides oversight through the Compliance Office, an independent department reporting directly to the County Manager.

### Compliance Office

The Compliance Office's mission is to create a culture of excellence, integrity, accountability, and ethical behavior by ensuring compliance through standards, procedures, Administrative Orders, Rules, internal controls, and training.

#### Compliance Office Organization Chart



The Compliance Office is responsible for the following actions within the organization.

- Manage the Compliance and Ethics Program
- Ensure an annual review of Rules / Administrative Orders (AO) by the appropriate owners to confirm up-to-date standards within the organization
- Ensure adequate communication, education, and training related to Compliance operations
- Promote a culture of business optimization
- Ensure the organization is aware of the rules and consequences for non-compliance detailed within our internal progressive discipline process
- Maintain an internal reporting system for employees to report misconduct
- Administer the organization's Workplace Investigation process and corrective action recommendations

## Compliance Partners

To ensure effective compliance program administration, the Office works closely with all JCC leadership to establish Compliance Partners. As liaisons, the Compliance Partners:

- Help spread messaging within the departments
- Provide feedback on the effectiveness of the Compliance Program
- Alert the Compliance Office about potential misconduct and possible issues affecting culture advancement





## Our Values and the JeffCo Way

Jefferson County Commission's values are the foundation in guiding our decisions and actions. The Compliance Framework was designed to align with all six values.

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### TRANSPARENCY

All needed information is provided through communication that can be trusted around commissioners, departments, employees and the community.

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### INCLUSION

We value the diverse viewpoints, perspectives and backgrounds of all employees and citizens.

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### INTEGRITY

From the top down and bottom up, Jefferson County acts with honesty, trustworthiness, and integrity.

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### INNOVATION

Every day provides the opportunity to take a fresh perspective on how to best serve the needs of Jefferson County citizens.

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### ENERGETIC SERVICE

Each employee and department is accountable to providing the highest customer service to our citizens. If you need something from us, consider it done.

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### SAFETY

The health and well-being of Jefferson County citizens, including employees, is of paramount importance for each department and individual serving the County.

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The JeffCo Way is an extension of these values.



## Our Culture of Compliance

JCC's dedication to maintaining a strong culture of compliance is a cornerstone of our organizational values and operational integrity. To reinforce this commitment, all employees are requested to annually affirm their understanding and adherence to our compliance standards. This declaration serves as a pledge to uphold the highest ethical principles, ensure compliance with all applicable laws and regulations, and contribute to a workplace environment that prioritizes accountability and transparency. By reaffirming this commitment each year, we collectively strive to foster a culture where compliance is not just a policy, but a fundamental aspect of who we are and how we operate.

### Culture of Compliance Statement

**Employees acknowledge that they have read the following statement every year as a part of registration for Compliance Week. Acknowledgements are tracked by department.**

Our culture of compliance encourages all of us to be active, engaged participants in improving and enjoying our work environment. We take pride in doing the right thing. When we make mistakes, we learn from and fix them. When the right course of action isn't clear, we seek guidance and make the way clearer for those coming behind us. Regardless of our position or title, we embrace our responsibility to speak up and report suspected wrongdoing. We value and stand up for our fellow co-workers, ourselves and our JeffCo Way.



## Our Code of Ethical Behavior

Jefferson County Commission's Code of Ethical Behavior, titled *Guided by Ethics the JeffCo Way*, contains our principles for conducting business with respect and responsibility, aiming to exceed the highest ethical standards. It outlines the expectations for every employee of Jefferson County Commission, including independent contractors. An executive code of conduct adapted from Alabama Ethics Laws is also included. By adhering to our code of ethical behavior and demonstrating ethical leadership in everything we do, we uphold the trust of our customers, partners, and communities.

In addition to outlining the expected standards of behavior, this document clearly states the County's position regarding misconduct, its consequences, and reporting procedures. We expect every member of our team to hold themselves and their colleagues accountable. Misconduct of any kind is not tolerated within our organization. Whether it's unethical behavior, non-compliance with AOs and Rules, harassment, discrimination, or any other form of misconduct, we take it seriously and will take swift and appropriate action.

The Code of Ethical Behavior is reviewed for revision every year to ensure it remains current, effective, and aligned with the latest ethical standards and regulatory requirements. It is also updated promptly in response to significant changes to laws, referenced Rules and Administrative Orders.

It currently details the following expected behaviors:

- **Show That You Care – Speak Up**
- **Respect the Investigation Process**
- **Respect Others**
- **Provide Accessibility and Reasonable Accommodations**
- **Ensure Safe Facilities**
- **Eliminate Harassment and Discrimination**
- **Separate Political Activities**
- **Protect Our Assets**
- **Safeguard Confidential Information**
- **Declare and Avoid Conflicts of Interest**
- **Use County Time and Resources for County Work**
- **Avoid Nepotism**
- **Know the Limits on Gifts, Favors, Entertainment and Payments**
- **Avoid Bribery**
- **Ensure Procurement Integrity**
- **Travel Safely and With Integrity**

## Roles and Responsibilities – Leadership, Oversight, and Culture

Compliance is everyone's responsibility. We all play a vital role as compliance champions within our organization. Whether you're in Environmental Services, Roads and Transportation, Finance, HR, or any other department, your commitment to compliance excellence makes a difference every day.

### All Employees

Employees have several responsibilities to support a culture of compliance within the workplace. These responsibilities encompass adhering to ethical standards, fostering a culture of integrity, and upholding the organization's values.

#### All Employees



#### Act with Honesty and Integrity

Employees have a duty to conduct themselves with honesty, integrity, and transparency in all professional interactions and decision-making processes. This involves refraining from engaging in dishonest, fraudulent, or unethical behavior, including lying, cheating, or misrepresenting information.



#### Respect Others

Employees are responsible for treating colleagues, citizens, vendors, and other stakeholders with respect, dignity, and fairness. This includes fostering a diverse and inclusive work environment where differences are valued, and everyone is treated equitably.



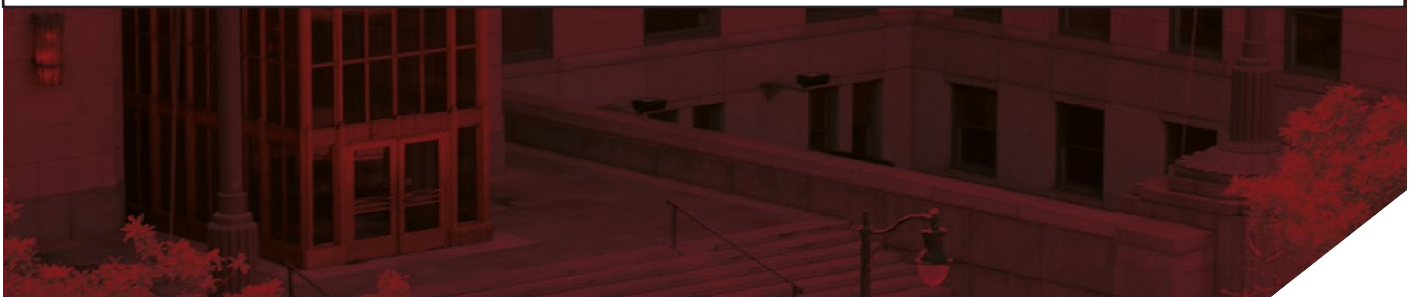
#### Promote a Culture of Ethics

Employees play a vital role in promoting a culture of ethics and integrity within the organization. This involves leading by example, encouraging open communication, and challenging unethical behavior when necessary.



#### Prioritize Continuous Self-Reflection and Improvement

Employees should engage in ongoing self-reflection and self-improvement to enhance their ethical awareness, judgment, and decision-making skills. This includes reflecting on past experiences, seeking feedback, and learning from ethical challenges and successes.



## Leaders

Our leaders utilize a combination of communication methods to effectively convey a unified position concerning misconduct to employees and reinforce the importance of upholding ethical standards and compliance with County AOs and Rules. Regular communication and reinforcement of these messages are essential for creating a culture of integrity and accountability within our organization.

### All Leaders



#### Set the Tone

Senior leaders and management should lead by example and demonstrate a commitment to compliance in their actions and decision-making processes.



#### Performance Expectations and Reviews

Managers incorporate discussions on ethical behavior and compliance with County AOs/Rules into employee performance expectations and reviews. They provide feedback and recognition for employees who uphold the County's values and demonstrate ethical conduct.

## Compliance Office

As the owner of the Compliance Program, the Compliance Office team is responsible for establishing, preserving, protecting, and improving Jefferson County Commission's culture of integrity.

### Compliance Office



#### Compliance Training Modules

The Compliance Office integrates messages about the County's stance on misconduct into compliance training modules and e-learning courses. Scenario-based training is used to illustrate the importance of ethical decision-making and the potential consequences of misconduct.

# Rules, Administrative Orders, and Standard Operating Procedures

The Compliance Office enables the organization's journey to excellence by enhancing and assessing the primary components of the internal control environment – written procedures, documented business processes, effective internal controls, and defined performance standards. We conduct Business Process Optimization (BPO) Assessments to ensure that all Standard Operating Procedures (SOPs), Rules, and Administrative Orders remain current, accurate, and aligned with regulatory requirements, industry standards, and best practices. This systematic review process helps identify any outdated, redundant, or ineffective AOs/Rules, as well as opportunities for improvement or enhancements.

## Effective AO and Rule Communication

Jefferson County Commission provides access to Rules, Regulations, and Administrative Orders in the Compliance Office section of the [jccal.org](http://jccal.org) website, including documentation of the purpose, scope, and last revision date for each AO and Rule. The website is accessible to individuals with disabilities, including those who may use assistive technologies such as screen readers or voice recognition software.

The Standard Operating Procedure Library is online and available to all employees on the JeffCo Way SharePoint, along with the Master Process Chart, which is a catalog of all master processes.

The Compliance Office ensures that employees receive training and communication regarding compliance AOs, Rules and procedures, including updates and revisions. This process helps ensure that individuals are aware of their responsibilities and obligations under organizational guidelines.

We also have feedback mechanisms for employees and third parties to provide input, ask questions, or raise concerns about AOs, Rules and SOPs. We intentionally encourage open communication and responsiveness to address any confusion or ambiguity and improve effectiveness over time.

## Provide Guidance on Implementation

To support our employees in understanding and applying compliance rules in their day-to-day activities, we offer practical guidance and resources. These resources include comprehensive training programs, easy-to-understand reference materials such as infographics, and access to compliance experts who can provide personalized assistance. Additionally, we regularly update our internal

knowledge base with the latest best practices and regulatory changes, ensuring that all employees have the tools they need to uphold our compliance standards effectively. By equipping our workforce with these resources, we aim to foster a culture of compliance that permeates every aspect of our operations.

## Business Process Optimization Assessment Framework

The BPO Assessment Framework is designed to support two separate sets of activities – BPO facilitated engagements and BPO Assessments.

- **BPO Quality Engagements:** Facilitated sessions with departments focused on developing their AOs/Rules, procedures and business process documentation.
- **BPO Assessments:** Monitoring reviews conducted by the Compliance Office to validate the existence and completeness of AOs, Rules, SOPs, and business process documentation.

The Compliance Office conducts annual reviews of AOs, Rules, and SOPs to evaluate the accessibility and effectiveness of distribution efforts. We review usage metrics, feedback data, and compliance rates to identify areas for improvement and ensure continuous enhancement of effectiveness.

When needed, we form cross-functional review teams consisting of representatives from relevant departments, including legal, compliance, HR, operations, and subject matter experts who are then assigned clear responsibilities and roles.

Our standardized review criteria and guidelines to assess the effectiveness, relevance, and compliance of AOs and Rules are:

- **Currency:** Is the AO/Rule up-to-date with current laws, regulations, and industry standards?
- **Clarity:** Is the AO/Rule clear, concise, and easy to understand?
- **Consistency:** Are AOs/Rules consistent with each other and with JCC's values and objectives?
- **Adequacy:** Does the AO/Rule adequately address the risks and requirements it is intended to mitigate or address?
- **Accessibility:** Are AOs/Rules readily accessible to all relevant stakeholders, and are procedures documented for ease of implementation?

## Review Process

### AO/Rule Review



- Conduct a comprehensive review of each AO/Rule according to the established schedule and criteria.
- Collect feedback and input from stakeholders, including employees affected by the AOs/Rules, compliance officers, legal counsel, and external advisors if necessary.
- Document any proposed changes, updates, or revisions to AOs/Rules during the review process.

### Approval and Implementation



- Submit reviewed AOs/Rules for approval by the appropriate authorities, such as the executive leadership team.
- Ensure that approved changes are effectively communicated to all relevant stakeholders and implemented within the organization.

### Document and Recordkeeping



- Maintain accurate documentation and records of the AO/Rule review process, including meeting minutes, review findings, proposed changes, approvals, and implementation status.
- Store AOs/Rules in the centralized location on the [jccal.org](http://jccal.org) website for easy access and reference.

### Training and Awareness



- Provide training and awareness sessions to employees on any significant AO/Rule changes resulting from the review process.
- Communicate the importance of compliance with updated AOs/Rules and provide guidance on their proper implementation and adherence.

### Continuous Improvement



- Continuously evaluate and refine the AO/Rule review process based on lessons learned, feedback from stakeholders, and changes in regulatory requirements or organizational needs.
- Incorporate feedback mechanisms to gather input from employees and stakeholders on the effectiveness and usability of AOs/Rules.

## Roles and Responsibilities – AOs, Rules, and SOPs

Department staff, leaders and the Compliance Office have a collaborative approach to developing, reviewing, and evaluating AOs/Rules.

### Department Staff and Leaders

#### Staff and Leaders



#### Comply with AOs/Rules

Employees are responsible for familiarizing themselves with and adhering to all Rules, Administrative Orders, and regulations relevant to their roles and responsibilities. This includes compliance with laws and ethical guidelines governing their conduct.



#### Identify Needs

Department staff and leaders are responsible for identifying the need for new Rules or updates to existing ones based on changes in operations, regulations, government standards, or other County requirements.



#### Draft AOs/Rules

Collaborate to draft and update AOs/Rules relevant to the department's operations, ensuring clarity, accuracy, and alignment with County goals and compliance requirements.



#### Review AOs/Rules

Conduct initial reviews of procedures to ensure they meet the intended objectives, address identified needs, and comply with relevant AOs/Rules.



#### Seek Feedback

Seek feedback from stakeholders within your department and other relevant areas of the organization to ensure that AOs/Rules are practical, effective, and well-understood by those who will be implementing them.



#### Implement AOs/Rules

Once AOs/Rules are finalized, ensure their proper implementation within your respective areas, including providing necessary training and support to employees.



#### Monitor Effectiveness

Department staff and leaders continuously monitor the effectiveness of AOs/Rules in achieving desired outcomes and identify areas for improvement or refinement based on feedback, performance metrics, and observed results.



## Compliance Office

The Compliance Office plays a coordinating role in ensuring that the annual review of AOs/Rules takes place across all departments within the organization. They establish a review schedule, provide guidance on review criteria, and monitor progress.

### Compliance Office



#### Provide Oversight

The Compliance Office oversees the review process to ensure that AOs/Rules are reviewed in a timely manner and that any identified gaps or deficiencies are addressed appropriately.



#### Evaluate Compliance

The Compliance Office evaluates the effectiveness of AOs/Rules from a compliance perspective, ensuring that they align with rules, Administrative Orders, and standard operating procedures.



#### Assess Consistency

They assess the consistency of procedures across departments to ensure uniformity in approach and adherence to organizational standards.



#### Document Review Findings

They document review findings, including any recommended changes or updates to procedures, and ensure that appropriate approvals are obtained before implementation.



#### Report to Leadership

The Compliance Office reports to the County Manager on the outcomes of the annual review process, highlighting areas of improvement, compliance risks, and actions taken to enhance procedural effectiveness.



#### Offer Training

Offer training and education programs to familiarize employees and third parties with organizational AOs/Rules. Provide high quality training materials, interactive sessions, and opportunities for Q&A to ensure understanding and compliance.



#### Announce AO/Rule Availability and Updates

Communicate regularly with employees and relevant third parties to inform them about the availability of AO/Rule updates or revisions, and any changes in compliance requirements. Utilize various communication channels, such as email, intranet announcements, newsletters, and training sessions, to reach all employees.

## Communication and Engagement Initiatives

The ultimate goals of our communication and engagement initiatives are to foster a culture of compliance where employees understand their responsibilities and actively contribute to ethical and lawful conduct.

We continuously evaluate and improve communication strategies based on feedback from employees, changes in regulatory requirements, and evolving business needs. We recognize that integrity, ethical behavior, and legal adherence are not static attributes but rather ongoing commitments that require continuous learning, development, and reinforcement. Therefore, we provide resources, training, and support to help employees deepen their understanding of ethical principles, legal requirements, and compliance best practices.

The Compliance Team ensures that employees have easy access to resources and support related to compliance, such as AOs/Rules, training materials, and contact information for compliance officers or designated points of contact.

We plan engagement activities and messaging with regulatory requirements, internal audit schedules, and other County priorities in mind. We also collaborate with cross-functional teams, including HR, Legal, IT, and Public Relations, to ensure alignment and integration of compliance communications with other organizational initiatives.

### Two-Way Communication

We seek feedback from employees about their understanding of compliance requirements and any challenges they may face in adhering to them. We actively engage with employees to address questions, concerns, and suggestions related to compliance. Surveys and feedback mechanisms are used to gather input from employees regarding their experiences with reporting mechanisms, including accessibility, awareness, and satisfaction.

Compliance personnel are visible and approachable, attending staff meetings, lunch and learn activities, etc. to discuss compliance efforts.



Compliance staff provide in-person training quarterly to assigned departments to establish rapport and ensure employees have an opportunity to ask questions for increased understanding.

Senior leadership communicates directly with employees about the County's stance on misconduct as needed. Employees are encouraged to ask questions and seek clarification on any issues related to ethical conduct.

We have multiple avenues for employees to report compliance concerns, seek guidance, and ask questions without fear of retaliation.

## Voice Concerns

### [Rule Number: 5.1.29 – Integrity Matters](#)

We foster a culture of accountability where employees are empowered to speak up about ethical concerns, report misconduct or violations, and seek guidance on ethical dilemmas without fear of retaliation. We believe that open communication, transparency, and accountability are essential for upholding our values and maintaining trust within Jefferson County Commission. When making a complaint or reporting a violation, employees have the option to self-identify or report anonymously. Confidentiality and non-retaliation protections are upheld for individuals who report concerns through reporting mechanisms. Retaliation against employees who report compliance concerns in good faith is strictly prohibited, promptly investigated, and may result in disciplinary action.

We have clear channels for reporting any concerns or suspicions of misconduct, including anonymous reporting options. Any complaint regarding wrongdoing, violations of AOs, Rules, law or SOPs, accusations of fraud, waste and abuse, or other misconduct, made by an employee to the Compliance Office, management or any other County official is a protected communication.

### 3 Ways Jefferson County Employees Can Report Wrongful Conduct



#### Manager


Employees are encouraged to talk to their direct supervisor or manager first, if they are comfortable. If that person isn't available or doesn't satisfactorily respond, the employee may speak to any Jefferson County manager.



#### Compliance Office

Employees can contact the Compliance Office.

 716 Richard Arrington Jr. Blvd. N Suite B305, Birmingham, AL 35203

 (205) 325-5535


 [compliance@jccal.org](mailto:compliance@jccal.org)



#### EthicsPoint Hotline

Employees who prefer to report anonymously, or who otherwise prefer to report online or through a hotline, may do so using our 24/7 anonymous reporting hotline.

 [jccal.ethicspoint.com](http://jccal.ethicspoint.com)

 (844) 759-0034

Jefferson County citizens or employees reporting wrongful conduct, employment discrimination and/or harassment related to or involving employees in the Compliance Office, may use EthicsPoint to direct their complaint directly to the County Attorney's Office via the Intake Coordinator.

Your voice matters, and your courage in coming forward helps us maintain the integrity of our organization. The Jefferson County Commission Compliance Office is a neutral party and fact finder whose major functions are to receive, investigate and remedy complaints.

## Training Programs

The Compliance Office conducts regular training sessions and workshops on ethical conduct, the consequences of misconduct, compliance with County AOs/Rules, and relevant compliance topics tailored to employees' roles and responsibilities. Training programs and awareness campaigns are conducted regularly to educate employees on the purpose, use, and benefits of reporting mechanisms and to promote a culture of transparency and accountability.

We aim to use interactive and engaging methods to reinforce key messages and encourage active participation. Employees are sometimes required to complete assessments or quizzes to ensure understanding of the training material.

We offer a variety of training formats, including on-demand online courses, in-person workshops, webinars, and interactive sessions. We incorporate multimedia elements such as videos, infographics, and interactive quizzes to capture attention and reinforce key messages. Employees in certain roles or departments may be required to undergo specialized compliance training tailored to their specific job functions.

## Awareness Campaigns

The objective of the annual compliance communication plan is to promote awareness, understanding, and engagement with JCC's compliance program among employees, customers, and other relevant parties. This plan aims to reinforce the importance of compliance, encourage a culture of ethics and integrity, and foster transparency and accountability throughout the organization.

We utilize a mix of communication channels to effectively reach our employee base, including:

- JCC website
- Department meetings and site visits
- Training sessions and workshops
- Printed materials (posters, brochures, flyers)
- Email newsletters and updates

We develop and implement a content calendar with key themes and topics to be covered in compliance communications throughout the year, such as:

- Annual Compliance Week
- Compliance AO/Rule updates and reminders
- Training announcements and schedules
- Compliance success stories and case studies
- Regulatory changes and updates
- Tips for ethical decision-making and behavior
- Reporting mechanisms for compliance concerns

## Roles and Responsibilities – Communication and Engagement Initiatives

### All Employees

#### All Employees



#### Complete Training

Actively participate in and complete all assigned compliance training within the specified timeframes. Employees are responsible for actively participating in ethics training programs to enhance their understanding of ethical principles, compliance requirements, and expectations for behavior in the workplace.



#### Report Noncompliance and Concerns

Employees have a responsibility to report any unethical, illegal, or non-compliant behavior they observe or become aware of in the workplace. This includes raising concerns directly to supervisors or compliance officers, or through the 24/7 anonymous reporting hotline.



#### Seek Guidance and Support

Employees should seek guidance and support from supervisors, compliance officers, or other relevant authorities when faced with ethical dilemmas or uncertainties. They should not hesitate to ask questions, seek clarification, or request assistance in navigating ethical challenges.

**Leaders****Support Training Initiatives**

Ensure direct reports understand the importance of compliance training and support their completion of training requirements.

**Value and Support All Reporting Mechanisms**

Welcome dialogue with your direct reports. Encourage employees to raise concerns and report potential compliance violations through the hotline or direct communication with compliance officers.

**Reiterate Zero Tolerance for Misconduct**

Consistently communicate the County's position on misconduct during team meetings, one-on-one discussions, and performance reviews.

**Let Your Actions Speak**

Lead by example and demonstrate a commitment to ethical behavior in your actions and decisions.

**Compliance Office****Oversee Compliance Training Program**

Design and implement targeted training and education programs to enhance compliance awareness and understanding among employees. Maintain training records.

**Increase Awareness**

Develop creative awareness campaigns to promote specific compliance topics or initiatives, using engaging visuals, slogans, and messaging.

**Reporting Mechanisms**

Promote the availability of the ethics hotline and other reporting channels regularly through various communication channels.

**Ask For and Respond to Feedback**

Solicit feedback from employees on the fairness and consistency of disciplinary actions and incentives and make adjustments as necessary.

## Response and Remediation

The Jefferson County Commission has a structured process for responding to employee concerns and misconduct, which promotes fairness, transparency, and consistency in disciplinary actions and incentives.

### Workplace Investigation Process

The Compliance Office investigates complaints and accusations of wrongdoing against and/or by County merit system employees. When a citizen or an employee makes a complaint, they are interviewed by a Compliance Office team member. If another employee is named in the complaint in any manner, he/she may be called to an interview.

All employees must be honest in the interview process and give complete information as requested. The employee will be advised not to discuss the interview or the case with any other employee. Failure or refusal to honestly give information or divulge information about the interview or case can lead to disciplinary action up to and including termination.

We ensure that compliance investigations are properly scoped to address the issues at hand effectively, minimize risks, and achieve the investigation's objectives in a timely and efficient manner. Properly scoped investigations are crucial for conducting a thorough and effective examination of the issues at hand while minimizing unnecessary delays and resource wastage.

#### Steps of the Investigation Process

- Identify the specific allegations, concerns, or areas of potential non-compliance that need to be addressed. Identify the specific standard, Administrative Order, or rule allegedly violated. Clearly define the objectives and goals of the investigation.
- Determine the scope of the investigation by outlining the questions that need to be answered and the information that needs to be gathered to achieve the investigation's objectives.
- Collect all available information related to the alleged misconduct or compliance issue, including documents, emails, reports, and witness statements.
- Review any relevant rules, Administrative Orders, and standard operating procedures, contracts, regulations, and other governing documents to understand the context and relevant requirements.
- Consult with legal counsel and subject matter experts, as needed, to ensure that the investigation scope is appropriate and legally sound.

The Compliance Office may have a business responsibility to continue investigating certain types of complaints, even if the employee requests withdrawal of the complaint, and will do so where applicable.

## Timely Response

Jefferson County has a legal obligation to promptly investigate and respond to all complaints regarding potential violations. Supervisors who receive a complaint of, or learn of, an actual or suspected violation are required to promptly (ideally within 24 hours) forward that complaint to the Compliance Office or the County Attorney's Office. As soon as reasonably possible, the County will investigate any allegations and take appropriate remedial action.

Information regarding an allegation of discrimination or harassment and the parties involved is kept as confidential as possible and is shared only with those who have a legitimate need to know. This includes those individuals who may be interviewed during informational fact finding or those who may be called upon as witnesses.

## Corrective Action Recommendations

The Compliance Office has the authority to reconcile complaints and recommend corrective actions. The Compliance Office will identify and recommend resolutions of any violations of County Rules or regulations through corrective actions issued to the Department Head. Corrective actions are developed to address any issues revealed through a case investigation that require resolution.

If there was a violation, the Compliance Office will consult with the department's appropriate leadership to develop an Action Plan to resolve the violation. The Compliance Office and the department will review the terms, make any appropriate modifications and establish a deadline by which the department will fulfill the issued Action Plan.

In some instances where there is no violation, the Compliance Office may identify best practices as a proactive approach to improve a matter that may have been revealed during the investigation.

Corrective action examples may include but are not limited to:

- Coaching/counseling an employee
- Providing specific training in an effort to improve the behavior or performance
- Creating or revising an AO/Rule or process
- Holding employees/leadership accountable for their actions

As appropriate, as in cases of holding leadership accountable for their actions, the Compliance Office will submit recommendations to the County Manager and/or the County Attorney's Office for review. Failure to adhere to the Action Plan process may result in disciplinary action by the County Manager.

Violation of Jefferson County Rules and Regulations, failure to perform up to required work standards,



and other inappropriate behaviors or actions will result in counseling and disciplinary action taken by departmental management.

Our disciplinary process allows all employees an opportunity to go before the County Manager for allegations of noncompliance. To ensure consistency and fairness, the hearings are also attended by Legal and the Chief Compliance Officer.

This process includes protocols for investigating and addressing allegations of misconduct through thorough investigations and corrective actions. We respond promptly to compliance incidents by taking appropriate disciplinary action against individuals involved in wrongdoing and implementing measures to prevent recurrence. Additionally, we offer remedial training and support to employees involved in compliance incidents to reinforce ethical standards and prevent future misconduct.

Disciplinary guidelines are followed consistently throughout the County and are subject to all levels of personnel regardless of position, title, or rank. We promote accountability, maintain morale, and foster a positive organizational culture by applying disciplinary actions and incentives fairly and consistently.

- [☞ Rule Number: 5.1.14 – Employee Conduct and Progressive Discipline](#)
- [☞ Administrative Order 02-2 – Formal Discipline of County Employees](#)
- [☞ Administrative Order 20-01 – Harassment and Retaliation](#)
- [☞ Rule Number 5.1.17 – Equity and Inclusion](#)

## Roles and Responsibilities – Response and Remediation

### All Employees

All employees are responsible for participating in feedback mechanisms, reporting concerns promptly, and supporting efforts to learn from each other.

#### All Employees



#### Support the Investigation Process

No one may restrict an employee from contacting the Compliance Office or reporting wrongdoing to a supervisor or more senior official. If you're requested to participate in a misconduct investigation, cooperate fully. Provide accurate information and share all relevant details. Remember that retaliation in any form is not permitted.



#### Participate in Surveys

Employees may be called upon to submit responses to surveys or participate in focus groups from time to time. Your input is needed and vital to the improvement of the County. Therefore, we ask you to participate and be honest in providing feedback.



#### Share Lessons Learned

When you experience close calls or lessons learned, share them with your supervisor and team.

## Leaders

### Leaders



#### Be Consistent

Ensure that disciplinary decisions are based on objective criteria and evidence, rather than personal bias or favoritism. Apply disciplinary actions consistently across all employees, regardless of their position, tenure, or relationship with management. Similarly, apply incentives consistently to employees who meet the established criteria, without discrimination or undue influence.



#### Be Fair

Provide employees with fair and impartial due process when facing disciplinary action, including the opportunity to respond to allegations, present evidence, and appeal decisions. Ensure that disciplinary actions are proportional to the severity of the misconduct and consider mitigating factors, such as past behavior and performance.



#### Be Transparent

Maintain transparency in the disciplinary process by clearly communicating expectations, consequences, and reasons for disciplinary actions to employees. Communicate the criteria and rationale for incentives, as well as the process for determining eligibility and distributing rewards.



#### Never Retaliate

Do not retaliate against anyone who raises a good faith concern or takes part in an investigation. The consequence of retaliation is disciplinary action, up to and including termination.

## Compliance Office

### Compliance Office



#### Promptly Address Compliance Incidents

Address any compliance-related inquiries or concerns raised by employees. The Chief Compliance Officer is a part of the Disciplinary Hearing process to ensure consistency and fairness.



#### Gather Feedback

Solicit feedback from employees on the fairness and consistency of disciplinary actions and incentives and make adjustments as necessary.



#### Provide Training and Guidance

Ensure that managers and supervisors receive training on disciplinary AOs, Rules, and procedures, as well as on how to apply them consistently and fairly. Provide guidance on recognizing and rewarding positive behavior and performance, including the importance of fairness, transparency, and objectivity.



#### Champion Leadership Accountability

Hold leaders and decision-makers accountable for applying disciplinary actions and incentives fairly and consistently. Ensure that leaders lead by example and demonstrate a commitment to fairness, integrity, and transparency in their actions and decisions.



#### Strive for Continuous Improvement

Continuously assess and refine disciplinary procedures, and incentive programs based on feedback, lessons learned, and changes in needs and priorities. Stay informed about best practices and emerging trends in disciplinary management and incentives to identify opportunities for improvement.

## Evaluating the Compliance Program

The Compliance Program is evaluated on a routine basis to assess its effectiveness in preventing, detecting, and mitigating compliance risks within Jefferson County Commission. The evaluation process helps identify strengths, weaknesses, and areas for improvement, allowing for enhancements to the program's structure, AOs, Rules, procedures, and training. Data collected from reporting mechanisms, including the number of reports received, response times, resolution outcomes, and trends, will be analyzed to identify areas for improvement.

### Evaluation Criteria

Criteria and metrics used to assess the effectiveness of the Compliance Program include:

- Adherence to regulatory requirements and industry standards
- Compliance training completion rates and effectiveness
- Incident reporting and resolution processes
- Internal audit findings and remediation efforts
- Employee awareness and understanding of AOs, Rules, and SOPs
- Feedback from stakeholders, including employees, management, and regulators
- Compliance program benchmarking against industry peers

### Benchmark and Compare

The Compliance Office benchmarks the Compliance Program against industry peers and best practices to identify areas of strength and opportunities for improvement. This includes comparing performance metrics and practices to assess alignment with industry standards.

## Evaluation Areas

### Compliance Culture and Tone from the Top

The Compliance Office team assesses the organization's compliance culture and the tone set by senior leadership. They evaluate the commitment to ethics, integrity, and accountability demonstrated by leadership, as well as the level of employee engagement and participation in compliance efforts.

#### Metrics used to Evaluate the Compliance Culture

- Number of Compliance Office team member visits to department meetings
  - Number of employees in attendance
- Number of all-employee communications emails from the Compliance Office
  - Number of opened emails
- Number of all-employee emails from Senior Management that includes compliance-related information
  - Number of opened emails
- Resource allocation and budget considerations for compliance activities

The Compliance Office requests feedback and input from across the organization, including employees, management, compliance officers, legal counsel, and external advisors. They utilize surveys, focus groups, interviews, and other methods to gather insights into the Compliance Program's effectiveness.

### Compliance Rules and Procedures

Evaluate the organization's compliance Rules and procedures to ensure they are up-to-date, comprehensive, and aligned with regulatory requirements. Assess the clarity, accessibility, and effectiveness of AOs/Rules in guiding employee behavior and decision-making.

High risk areas are audited to confirm consistency with the established process.

#### Metrics Used to Evaluate Rules, Administrative Orders, and Procedures

- Number of AOs/Rules reviewed
- Date of last review

### Training and Education Programs

Compliance training and education programs are reviewed annually to assess their relevance, comprehensiveness, and effectiveness. This includes an evaluation of training materials, delivery methods, participation rates, and knowledge retention among employees.

The Compliance Office regularly reviews and evaluates the effectiveness of compliance communications and engagement strategies to:

- Reflect changes in laws, regulations, and County AOs/Rules
- Ensure its effectiveness and relevance

We solicit feedback from employees and incorporate lessons learned into future communication plans. We stay abreast of emerging trends, best practices, and regulatory developments to adapt and refine communication strategies accordingly.

## Reporting and Investigation Processes

### Reporting Process

The Compliance Office assesses the effectiveness of the overall reporting and investigation processes for compliance incidents.

- **Awareness:** Level of awareness among employees regarding the existence and purpose of reporting mechanisms, including training and communication efforts
- **Responsiveness:** Timeliness and responsiveness of the organization's response to reported concerns, including acknowledgment, investigation, and resolution
- **Confidentiality:** Confidentiality and anonymity protections provided to individuals who report concerns, ensuring their safety from retaliation or adverse consequences
- **Thoroughness:** Comprehensive documentation of reports and investigations, including clear records of incidents, steps taken, and outcomes
- **Follow-up and Closure:** Effectiveness of follow-up procedures and closure mechanisms to communicate outcomes and actions taken in response to reported concerns

### Anonymous Reporting Hotline

The effectiveness of the platform used for the anonymous hotline is assessed annually based on the following criteria:

- **Accessibility:** The ease of access to reporting channels and the availability of multiple channels (e.g., online, phone, text) to accommodate different preferences and situations.
- **Intuitiveness:** Determine the ease-of-use for employees, options to receive assistance, etc.
- **Data Security and Privacy:** Ensure data is encrypted at transit and rest.
- **Comprehensive Functionality:** Evaluate the ability of the platform to manage case routing, investigation workflow, analytics, etc.
- **Customization:** Evaluate the ability to utilize County branding and incorporate County-specific terminology, questions and processes.
- **Integrations:** Determine integration needs with other existing systems.

## Workplace Investigation Process

The investigation process is reviewed by the Compliance Office annually to identify areas of improvement and ensure that the process is effective, fair, and consistent.

Here are steps we use to review the investigation process and look for areas of improvement:

- **Gather Information:** Review documentation related to recent investigations, including investigation reports, interview notes, evidence collected, and correspondence with relevant parties.
- **Review AOs/Rules and Procedures:** Review rules, Administrative Orders, and procedures governing the investigation process. Ensure that these documents are up-to-date, comprehensive, and aligned with best practices and regulatory requirements.
- **Assess Compliance with AOs/Rules:** Compare the actual investigation process with the established AOs/Rules and procedures. Identify any deviations, gaps, or areas where AOs/Rules were not followed as intended.
- **Evaluate Investigation Outcomes:** Assess the outcomes of recent investigations, including findings, conclusions, and any actions taken as a result. Determine whether the outcomes were consistent with the evidence and in line with organizational values and objectives.
- **Review Documentation and Recordkeeping:** Examine the quality and completeness of documentation generated during the investigation process. Ensure that all relevant information is accurately recorded, organized, and maintained for future reference.
- **Interview Stakeholders:** Interview key stakeholders involved in recent investigations, including investigators, witnesses, complainants, and subjects. Solicit feedback on their experiences with the investigation process, including strengths and areas for improvement.
- **Analyze Feedback and Complaints:** Review feedback and complaints received about the investigation process from employees, stakeholders, or external parties. Look for recurring themes or issues that may indicate areas needing improvement.
- **Identify Training Needs:** Assess whether investigators and other staff involved in the investigation process have received adequate training and support. Identify any gaps in knowledge or skills that may require additional training or development.
- **Evaluate Timeliness and Efficiency:** Evaluate the timeliness and efficiency of the investigation process, including the time taken to initiate investigations, gather evidence, conduct interviews, and reach conclusions. Look for bottlenecks or delays that may hinder the effectiveness of the process.
- **Assess Communication and Transparency:** Evaluate the effectiveness of communication and transparency throughout the investigation process. Assess whether relevant parties were kept informed of progress, findings, and outcomes in a timely and transparent manner.



- **Consider Technology and Tools:** Assess whether the organization's technology and tools used in the investigation process are adequate and effective. Evaluate the usability, functionality, and integration of software, databases, and other resources.
- **Benchmark Against Best Practices:** Compare the organization's investigation process against industry best practices, standards, and benchmarks. Identify areas where the organization can learn from others and adopt proven strategies for improvement.
- **Develop Action Plan for Improvement:** Based on the findings of the review, develop a comprehensive action plan for addressing identified areas of improvement. Prioritize initiatives, set goals, assign responsibilities, and establish timelines for implementation.
- **Monitor and Measure Progress:** Implement mechanisms for monitoring and measuring progress on improvement initiatives. Track key performance indicators (KPIs), such as investigation cycle time, case closure rates, and stakeholder satisfaction, to assess the impact of changes.
- **Continuous Improvement:** Foster a culture of continuous improvement by regularly reviewing and refining the investigation process based on feedback, data, and lessons learned from past investigations. Encourage open communication and collaboration among stakeholders to drive ongoing enhancement.

## Monitoring and Auditing Activities

The Compliance Office evaluates monitoring and auditing activities to assess their scope, frequency, and effectiveness in detecting compliance issues. The team reviews audit findings, corrective actions, and follow-up procedures to ensure issues are addressed promptly.

## Identify Areas for Improvement and Develop Action Plans

Evaluation findings are analyzed to identify areas where the Compliance Program can be strengthened or enhanced. The Compliance Office develops action plans with specific goals, objectives, timelines, and responsibilities for addressing identified deficiencies and implementing improvements.

### Report Findings and Recommendations

Findings from compliance program evaluations are documented in a comprehensive report, including strengths, weaknesses, areas for improvement, and recommendations for action. The Chief Compliance Officer presents findings to the County Manager for review and approval.

By providing relevant data metrics and insights, along with a strategic overview of compliance initiatives and priorities, the executive briefing on compliance enables the County Manager to make informed decisions and demonstrate accountability for compliance oversight within the organization.



#### Metrics and Evaluation

The following key performance indicators (KPIs) are aggregated monthly and used to measure the effectiveness of compliance communications and engagement initiatives:

- Training completion rates
- Employee survey responses
- Incident reporting trends
- Year to Date Fiscal Investigation Overview, Countywide Case Overview, and Diversity Overview
- Case Category Trends
- Case Allegations by Departments (Top 3)
- Case Dispositions
- Consultations / Inquiry Contact Categories
- Compliance Rules / Administrative Orders Questions

 Every quarter, Compliance provides a presentation on the metric data to the County Manager.

We conduct periodic evaluations to assess the impact of compliance communications on employee behavior, attitudes, and knowledge.

## Implement Continuous Improvement Processes

The Compliance Office promptly addresses audit findings by implementing corrective actions, strengthening internal controls, and applying remedial measures. Mechanisms for ongoing monitoring and evaluation ensure continuous improvement of the Compliance Program. Compliance-related documentation, training, and controls are regularly updated to address evolving risks, regulations, and organizational needs.

Based on assessments, identified gaps are resolved through corrective actions and enhancements to reporting mechanisms. Continuous monitoring tracks the effectiveness of these improvements, while feedback from employees informs further refinements. This approach ensures a dynamic and responsive Compliance Program that supports the Jefferson County Commission's commitment to ethics and accountability.

## Appendix: Best Practices

### Ensure Clear and Concise AO/Rule Language

Clear and concise language is essential for ensuring that AOs/Rules and processes are easily understood, effectively communicated, and properly implemented. The importance of clear, concise AO/Rule language can be summarized as follows:

#### Importance of Clear, Concise AO/Rule Language

Enhances  
Understanding



Clear, concise language eliminates ambiguity and confusion, making it easier for employees to understand their rights, responsibilities, and expectations under AOs/Rules.

Promotes  
Compliance



When AOs/Rules are written in clear and concise language, employees are more likely to comply with them, reducing the risk of non-compliance, errors, and misunderstandings.

Supports  
Decision-Making



Clear AO/Rule language provides employees with the information they need to make informed decisions and take appropriate actions in accordance with guidelines.

Facilitates  
Training and  
Onboarding



Clear, concise AOs/Rules are easier to incorporate into training materials and onboarding programs, ensuring that new employees quickly grasp key AOs/Rules and procedures.

Improves  
Communication



Clear AO/Rule language facilitates effective communication between employees, managers, and stakeholders, enabling smooth collaboration and alignment across the organization.

Reduces Legal  
Risks



Clear, concise AOs/Rules help mitigate legal risks by ensuring that guidelines are accurately communicated and understood, reducing the likelihood of disputes or litigation.

By following these guidelines and best practices, we can ensure that our AOs/Rules are communicated clearly and concisely, leading to greater understanding, compliance, and effectiveness across the County.

### **Know Your Audience**

01

Understand the audience for your AOs/Rules and tailor the language to their level of expertise and comprehension. Avoid jargon, technical terms, and unnecessary complexity that may confuse readers.

### **Use Plain Language**

02

Use simple, straightforward language that is easy to read and understand. Avoid overly formal or legalistic language that may obscure meaning or intimidate readers.

### **Organize Content Effectively**

03

Structure AOs/Rules in a logical and coherent manner, using headings, bullet points, numbered lists, and visuals to break down complex information into digestible chunks.

### **Be Specific and Concrete**

04

Use concrete examples, scenarios, and real-world illustrations to clarify key points and demonstrate how AOs/Rules apply in practice.

### **Define Key Terms**

05

Define any technical or specialized terms used in the AO/Rule to ensure common understanding among readers. Provide explanations or references for terms that may be unfamiliar to some readers.

### **Avoid Ambiguity and Vagueness**

06

Be precise and unambiguous in your language, avoiding vague or open-ended statements that may lead to different interpretations.

### **Keep it Succinct**

07

Strive for brevity and conciseness, eliminating unnecessary words, phrases, or redundancies that do not add value to the AO/Rule.

08

**Use Active Voice**

Use active voice to make AOs/Rules more direct, engaging, and action-oriented. Passive voice can lead to confusion or ambiguity.

09

**Review and Revise Regularly**

Regularly review and revise AOs/Rules to ensure they remain current, accurate, and aligned with organizational goals and regulatory requirements. Solicit feedback from stakeholders to identify areas for improvement.

10

**Test for Clarity**

Test AO/Rule language with representative readers to ensure clarity and comprehension. Consider conducting focus groups or usability tests to gather feedback on readability and effectiveness.

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## Guidance on Capturing Lessons Learned

Utilizing lessons learned is crucial for organizational growth, improvement, and resilience. By capturing insights from past experiences, whether successes or failures, JCC identifies areas for improvement, avoids repeating mistakes, and capitalizes on best practices.

### Importance of Utilizing Lessons Learned

**Drives  
Continuous  
Improvement**



Lessons learned provide valuable feedback that can drive continuous improvement across all aspects of the organization, including processes, products, services, and strategies.

**Mitigates Risk**



Identifying and addressing weaknesses or deficiencies highlighted in lessons learned can help mitigate future risks and prevent potential problems from occurring.

**Inspires  
Innovation**



Lessons learned often uncover new ideas, approaches, or solutions that can inspire innovation and creativity within the organization.

**Facilitates  
Knowledge  
Sharing**



Utilizing lessons learned facilitates knowledge sharing and transfer within the organization, ensuring that valuable insights are disseminated and applied across teams and departments.

**Enhances  
Decision-Making**



Lessons learned provide decision-makers with valuable information and insights to make informed decisions, reducing uncertainty and increasing the likelihood of success.

**Improves  
Organizational  
Culture**



Emphasizing a culture of learning and improvement, where lessons learned are valued and acted upon, fosters a positive organizational culture that encourages accountability, transparency, and collaboration.

## How to Effectively Utilize Lessons Learned

### Capture Lessons Learned:

- Establish processes and mechanisms for systematically capturing lessons learned from projects, initiatives, processes, and events.
- Encourage team members to document their experiences, observations, and insights throughout the project lifecycle.

### Analyze and Synthesize Insights:

- Review and analyze lessons learned to identify common themes, trends, or patterns across different experiences.
- Synthesize insights into actionable recommendations and opportunities for improvement.

### Document Findings:

- Document lessons learned in a centralized repository or knowledge management system that is easily accessible to relevant stakeholders.
- Ensure that lessons learned are well-documented, clearly articulated, and categorized for easy reference.

### Share Knowledge and Best Practices:

- Facilitate knowledge sharing sessions, workshops, or meetings to disseminate lessons learned across the organization.
- Encourage teams to share best practices, success stories, and lessons learned with their peers to promote cross-functional learning and collaboration.

### Integrate into Processes and Procedures:

- Integrate lessons learned into existing processes, procedures, and methodologies to inform future decision-making and planning.
- Update project templates, guidelines, and documentation based on insights from lessons learned to improve project management practices.

### Assign Responsibility for Implementation:

- Assign responsibility for implementing lessons learned to specific individuals or teams, ensuring accountability and follow-through.
  - Establish timelines, milestones, and action plans for implementing recommendations and tracking progress.
-



**Monitor and Evaluate Impact:**

- Monitor the implementation of lessons learned and evaluate their impact on organizational performance, efficiency, and effectiveness.
- Solicit feedback from stakeholders to assess the effectiveness of implemented changes and identify further opportunities for improvement.

**Celebrate Successes and Acknowledge Challenges:**

- Celebrate successes resulting from the application of lessons learned, recognizing individuals and teams for their contributions to organizational learning and improvement.
  - Acknowledge challenges or setbacks encountered along the way, emphasizing the importance of resilience, adaptability, and continuous learning.
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**Jefferson County Commission**