

**Identification of Compliance Risk Areas**

**June 2023**

**Standard:**

AccessCNY will develop and implement a system to assess and minimize the risk of each program of the agency.

**Procedure:**

1. Each year the Corporate Compliance Officer will review and update the risk assessment survey according to regulation updates and trends.
2. At the end of each year, the Compliance Officer will forward the agency's risk assessment survey to each department's Program Director or designee for completion.
3. The completed risk assessments will be reviewed by the Compliance Officer and the results tallied by a number system.
4. The Compliance Officer will present the tallied results to the Compliance Committee and each program will be ranked low risk, moderate risk or high risk.
5. The results and recommendations from the Committee's review of the risk assessments will be included in the AccessCNY's annual compliance work plan.
6. Each high risk program will create a work plan to address their identified areas of risk. The Compliance Officer will work with each program to reduce the identified risk by reviewing the work plan status at program compliance meetings.
7. The Compliance Officer will review the status and progress of the agency annual work plan at the Compliance Committee meetings.
8. The Compliance Officer will review AccessCNY's Compliance work plan with the Board of Directors on an annual basis and as the need arises.