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Project Report

City of Austin Ethics Structure

May 20, 2008

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Austin, Texas

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City of Austin



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Date: May 20, 2008
To: Mayor and Council
From: Stephen L. Morgan, City Auditor
Subject: City of Austin Ethics Structure Project

I am pleased to present this project report on City of Austin Ethics Structure. This project was requested and approved by the Audit and Finance Committee and was included as part of our office's FY 2008 service plan.

The results of our work indicated that the City of Austin's ethics structure consists of controls dispersed throughout the organization that serve the three functions of prevention, detection/investigation and correction of unethical behavior among City employees and officials.

The City of Austin has many elements in its ethical structure many of which are also found in the ethics structures of the cities that we surveyed

However, it is important to note that a structure alone may not prevent ethics or integrity violations. Integrity violations may still occur, for example, in cases where the officials in an organization override controls.

The Office of the City Auditor is part of the City of Austin's ethics structure and over the years we have participated in its design. Therefore, we are not independent of the structure. As such, the scope of the work performed does not constitute an audit under the Generally Accepted Government Auditing Standards (GAGAS). Because of the independence impediment, we make no evaluation of the ethics structure and offer no recommendations in this report.

We appreciate the cooperation and assistance we received from the various entities responsible for ethics in the City of Austin as well as the different cities that participated in our ethics structure survey. We particularly want to thank the City's Integrity Officer, John Steiner, and his assistant, Alicia Olmstead, for their considerable contributions to this report.

Stephen L. Morgan, CIA, CGAP, CFE, CGFM
City Auditor

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BACKGROUND

The 2007 National Government Ethics Survey determined that ethics in government workplaces in the United States is deteriorating. This survey was conducted by the Ethics Resource Center. According to the survey:

- The strength of ethical culture in government workplaces in the United States is declining while pressure to commit misconduct is growing.
- One out of four government employees in the United States works in an environment conducive to misconduct.
- Local governments, in the United States, when compared with federal and state governments; experience the lowest levels of reporting (67%), the highest pressure to commit misconduct (16 %), and the highest levels of retaliation for those who report misconduct (20%).
- A government, by implementing a good ethics program and a strong ethical culture, can cut misconduct by 60 percent and increase reporting of ethics violations by 40 percent.

Ethics

“The moral principles governing or influencing conduct”

American Heritage Dictionary of the English Language

“A set of beliefs about what is morally right and wrong”

Cambridge Dictionary of American English

Neither federal nor state laws mandate a specific ethics program or structure for local governments. Neither the Federal Government nor the State of Texas mandates a specific ethics program or structure for local governments. However, the Federal Sentencing Guidelines, promulgated by the United States Sentencing Commission, provide the legal benchmark for compliance and ethics programs for both public and private organizations. When an organization is cited for violation of a federal law, having an ethics program based on specific steps contained in the Federal Sentencing Guidelines mitigates the potential for civil liability, helps the organization avoid criminal investigation, and creates better morale for employees. These steps are:

- Establishing compliance standards and procedures.
- Assigning overall compliance oversight responsibility to high level personnel of the organization.
- Exercising due care in delegating substantial discretionary authority to individuals within the organization.
- Ensuring effective communication at all levels.
- Taking reasonable steps to achieve compliance with standards.
- Consistently enforcing standards through appropriate disciplinary mechanisms.
- Taking reasonable steps, after an offense has occurred, to respond to the offense and prevent further similar offenses.

This is an example of a rule based ethics management structure. It gives priority to rules, regulations and policies as a means of determining ethical behavior. An alternative to this would be a value based ethics structure. Such a structure stresses the creation and maintenance of an ethical climate through a system of ethical values shared among all employees. Rule based and value based ethics management structures are not mutually exclusive. An organization can set up a structure that draws on the strengths of both.

City of Austin Management has set expectations for City employees.

The strategy of City of Austin management includes upholding, promoting and demanding the highest standards of ethics from all of its employees and officials, whether elected, appointed or hired. For that reason, City management expects all City employees and City officials to uphold the highest standards of personal integrity, truthfulness, honesty, and fairness in carrying out their public duties; to avoid any improprieties in their roles as public servants; and to never use their City position or powers for improper personal gain.

We should create an environment that encourages people to pursue their greatest potential in all things, at all times.”
Marc A. Ott – City Manager

Additionally, City of Austin management expects supervisors and managers to:

- be aware of the City’s ethics policies and procedures,
- exercise reasonable oversight over the implementation of ethics programs in the City,
- create and maintain a working environment where doing the right thing is expected, valued, and rewarded,
- initiate and implement measures and controls for preventing, detecting, investigating, and correcting wrongdoing, and
- protect employees who report wrongdoing in good faith from retaliation

The City of Austin management has adopted seven values that guide how the City’s management requires the City employees to conduct themselves. These principles include:

- Gutsy
- Green
- Creative
- Committed
- Collaborative
- Inclusive
- Spirited

“In my job I talk to thousands of City employees, and I find them to be very dedicated and focused on the missions of their departments. They want to do their jobs as efficiently and effectively as possible. So sometimes the hardest part about explaining the ethical restraints we have to operate under as public servants is that those restraints can get in the way of doing our jobs. But for a public servant job #1 is always the credibility of our program. If we lose our credibility with the public, we can lose the opportunity to do our jobs at all. We have to earn our credibility every day.”

John Steiner – City of Austin Ethics Officer

An ethics structure increases the probability of preventing, or identifying unlawful and unethical behavior. However, the presence of an effective ethics structure in an organization may not prevent all violations and does not guarantee that improper employee conduct will be entirely eliminated.

We are proud of the ethics and integrity control structure we have helped develop in the City of Austin. However, the structure alone may not prevent ethics or integrity violations when top level officials override controls.

Steve Morgan – City Auditor

The City of Austin ethics structure inventory project was requested and approved by the Audit and Finance Committee and was included as part of the City Auditor's FY 2008 Service Plan. Below are quotes on ethics from the members of the City Council Audit and Finance Committee.



“Confidence in your local government is based on the ethical and equitable behaviors of the City Council, City management, and City employees.”

“Public Interest must always come before private interest.”

Betty Dunkerley - Council Member



“Mutual trust is based on ethics, and ethics is the coin of the realm.”

Lee Leffingwell - Council Member



"High ethical standards are what make city government work."

Brewster McCracken – Council Member



“Citizens expect government to address their jobs, their health, and their children’s education. For people to participate and believe in government they must also believe in its ethics.”

Sheryl Cole – Council Member

OBJECTIVES SCOPE & METHODOLOGY

OBJECTIVE

The objective of the project was to inventory the ethics structure of the City of Austin and selected peer cities. Our project did not include evaluating the City's ethics structure and we have not issued any recommendations.

SCOPE

The project focuses on the current ethics structure in the City of Austin, including policies and procedures in place; and the entities whose duty is to prevent, detect, and correct unethical behavior as well as those of the selected peer cities.

Because the City of Austin management is currently in the process of revising some elements of the ethics structure, the scope of the information collected was limited to ethics initiatives prior to February 2008.

METHODOLOGY

In order to inventory the current ethics structure in the City of Austin, we:

- Conducted a phone and email survey on ethics initiatives for 27 City of Austin departments/offices
- Identified the City's existing ethics policies and past audit reports related to ethics structures
- Reviewed applicable laws, regulations, and statutes (Federal, State, City)
- Conducted interviews of key ethics management personnel in the City

In order to determine the ethics structure of selected peer cities we administered an online and phone survey of 17 American municipalities. The survey was conducted in January, February, and March of 2008. We identified cities based on:

- Population – we selected cities with a population above 200,000 people, based on the U.S 2000 Census data (this is applicable to all selected cities)
- The City's form of government – we selected some cities that have a similar form of government with that of Austin City (council-manager).
- Prior audits performed by the City Auditor – we selected some cities based on the fact that our office has consistently used these cities as comparable cities in our prior audits
- Geographical location – we selected some cities based on their geographical location in relation to Austin

The cities we surveyed, including Austin, are:

Arlington	Atlanta	Phoenix
Dallas	Jacksonville	San Diego
El Paso	Kansas	San Jose
Fort Worth	Memphis	Seattle
Houston	Minneapolis	Virginia Beach
San Antonio	Oklahoma City	

(All the cities, except Virginia Beach, responded to our survey)

Definitions

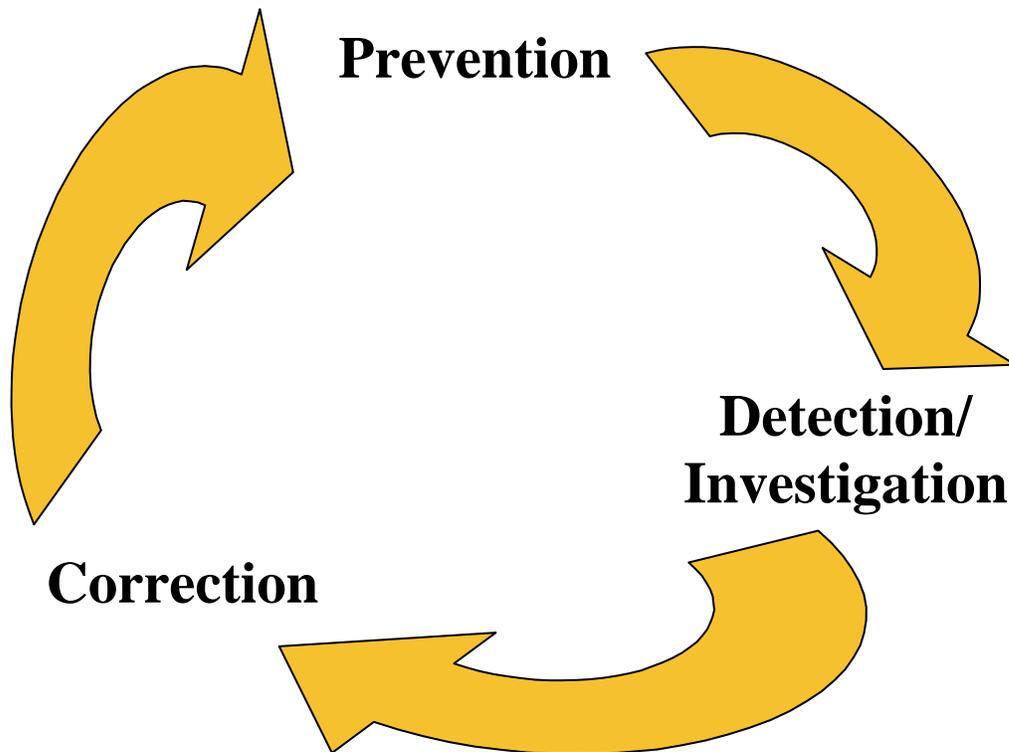
We define ethics structure, for this project, as those elements that serve the three functions of prevention, detection/investigation, and correction of unethical behavior. The major goals of an ethics structure serve to reduce the occurrence of ethics and integrity violations in an organization. They enable the organization to prevent, detect/investigate, as well as correct ethics and integrity violations.

Prevention refers to the controls designed to keep ethics and integrity violations from occurring in the first place

Detection/Investigation refers to those controls designed to discover ethics and integrity violations and to investigate those violations when they occur.

Correction refers to the controls designed to correct ethics and integrity violations that have been detected. They include both enforcement and remedies

The following model shows the relationship between these functions



Ethics violation prevention, detection/investigation, and correction functions help City employees to conduct themselves ethically in their work environment.

The term entity, for this project, refers to the people, offices, groups, committees, and commissions whose main job is to train, communicate, or enforce ethics policies to employees; and the people, offices, and groups that provide oversight for integrity issues within the City of Austin.

We use line departments in this report to refer to City departments other than HRD

Disclaimer – The Office of the City Auditor is part of the City of Austin’s ethics structure and over the years we have participated in its design. Therefore, we are not independent of the structure. As such, the scope of the work performed does not constitute an audit under the Generally Government Auditing Standards (GAGAS). Because of the independence impediment, we make no evaluation of the ethics structure and offer no recommendations in this report. We are offering this project as a non-audit service.

RESULTS

The City of Austin has an ethics structure, which comprises several elements that can be organized into three major functions. These include (1) prevention (2) detection/investigation and (3) correction. Austin's functions are dispersed throughout the organization. Some of elements in these functions are also found in other cities that we surveyed

The City of Austin's ethics structure consists of controls dispersed throughout the organization that serve the three functions of prevention, detection/investigation and correction

The major goals of ethics controls serve to reduce the occurrence of ethics and integrity violations as well as to correct ethics and integrity violations when they are detected within the City's workforce. These controls are dispersed throughout different entities in the City.

The City of Austin's ethics structure includes controls to prevent and detect/investigate instances of ethics and integrity violations, as well as to correct control deficiencies that may have led to, facilitated, or failed to detect ethics and integrity violations. This structure aims at controlling and reducing the occurrence of ethics and integrity violations within the City's workforce. Below are the controls for each function.

(1) Prevention of ethics and integrity violations

The prevention function includes controls designed to keep ethics and integrity violations from occurring in the first place. Ethics and integrity violation prevention controls include ethics training, activities for communicating ethics issues to the City's workforce, City ethics policies and procedures, and financial disclosures requirement for some City employees.

Ethics training

Through ethics training, City management provides information to City employees concerning relevant ethics-related state and local laws, regulations, and procedures such as the City's code of ethics, ethics policies, and administrative bulletins. Entities that provide ethics training to City employees include the Integrity Officer and the Human Resources Department (HRD). However, some individual departments such as the Austin Police Department (APD) and Public Works Department (PWD) also provide ethics training to their staff.

The City's Integrity Officer currently provides ethics training to City employees upon invitation from the department managers. The officer also provides ethics training to City board members upon request. This training is provided in a face-to-face format. HRD staff provides training to new City employees during the City's new employee orientation. This training has ethics training as one of the classes offered. In addition HRD offers a periodic voluntary training course through their Organization Development program.

Ethics policies and procedures

General integrity/ethics guidance in the City is provided in the form of City Ordinances, administrative bulletins, City personnel policies, and the City's ethics code. Ordinances are enacted by the City Council. Personnel policies and administrative bulletins are

promulgated by City Manager and HRD with City Council approval. Some departments have established additional formal internal ethics standard operating procedures.

Although many City policies have a bearing on ethics, we identified some key ethics-related policies in the form of administrative bulletins. These key ethics policies are listed in Exhibit 1 below.

**EXHIBIT 1
City of Austin Key Ethics Policies**

Administrative Bulletin number	Policy
06-03	<ul style="list-style-type: none"> • Fraud, Waste, and Abuse Reporting, Investigation and Prevention
07-07	<ul style="list-style-type: none"> • Authorized Use of City Funds for Employee Recognition Events: Communication retirement Gifts, Charitable Events, and Gratuities
06-02	<ul style="list-style-type: none"> • Guidance for Use of City Funds to Buy Meals for City Employees
07-04	<ul style="list-style-type: none"> • Service by City Employees on City Boards
06-01	<ul style="list-style-type: none"> • Guidance for the Non-City Use
07-08	<ul style="list-style-type: none"> • Acceptance and Use of Admission or Tickets
07-05	<ul style="list-style-type: none"> • Guidance for City of Austin Combined Charity Campaign
07-03	<ul style="list-style-type: none"> • Contact with Council Office: Responding to Requests for Information and Requests for Assistance
07-02	<ul style="list-style-type: none"> • Co-Sponsorship of Employee Heritage Events
05-02	<ul style="list-style-type: none"> • Use of Internal Communication Systems
07-06	<ul style="list-style-type: none"> • Solicitation of Gifts, Contribution or Items of Value by City Employees
98-01	<ul style="list-style-type: none"> • Use of City Resources by Non-Civil Service Employees

Source HRD Website <http://inside/hr/hrpolicy.cfm>

For a detailed list of City policies including the respective policy and procedure effective dates, revision dates, and review dates, refer to Appendix A

We also noted some standard operating procedures in place such as the Solid Waste Services Department’s Code of Conduct for Code Compliance Personnel; the City grievances procedures and guidelines for conducting background criminal investigation.

There are several entities involved in the policy creation; policy implementation; and policy dissemination, interpretation, and compliance assistance. For a detailed list of these entities and their functional responsibilities refer to Appendices B, C, and D respectively.

Financial disclosure

Both the State and City require certain elected officials and certain City executives to file statements of financial information with the City Clerk. The City Ordinance also requires some of the members of its Boards and Commissions to file financial disclosure forms. These statements serve as the basis for identifying potential conflicts of interest. Failure to file a financial disclosure can result in a fine. However, for members of the City’s Boards and Commissions, those who fail to file required statements can lose their positions. These annual financial disclosure statements are available for public inspection, on request, at the City Clerk’s office. Lobbyists are also required to register with the City Clerk, revealing who

their clients are and listing all of their lobbying-related compensation and expenditures. The City Clerk's office maintains a list of registered lobbyists and their clients on its Web site at https://coafusion/cc_lobbyist/default.cfm.

(2) Detection/Investigation of ethics and integrity violations

The City's detection function includes proactive controls designed to discover ethics and integrity violations in the City. The key entities involved in the activity are line departments, HRD, APD, Office of the City Auditor (OCA), and Corporate Internal Audit. For a detailed list of these entities and their functional responsibilities refer to Appendix E.

Once ethics and integrity violations have been detected in the City, these violations are then investigated. The investigation process is primarily guided by the City Code and City policies such as the City's personnel policies for non-civil service employees; and the Fraud, Waste, and Abuse Reporting, Investigation and Prevention Administrative Bulletin. For a detailed list of the entities involved in investigation of ethics and integrity violations in the City and their functional responsibilities refer to Appendix E.

Furthermore, City management has a formal grievance process which addresses the steps for initiating and responding to a grievance, holding hearings, making final decisions; and imposing limits. This process is guided by the Fraud, Waste, and Abuse Reporting, Investigation and Prevention Administrative Bulletin; as well as the City of Austin personnel policies. The Ethics Review Commission also has a formal ethics and integrity violations complaint and hearing procedure, which is spelled out in chapter 2-7 of the City Code. For detailed City Management and Ethics Review Commission ethics enforcement processes refer to Appendix F.

(3) Correction of ethics and integrity violations

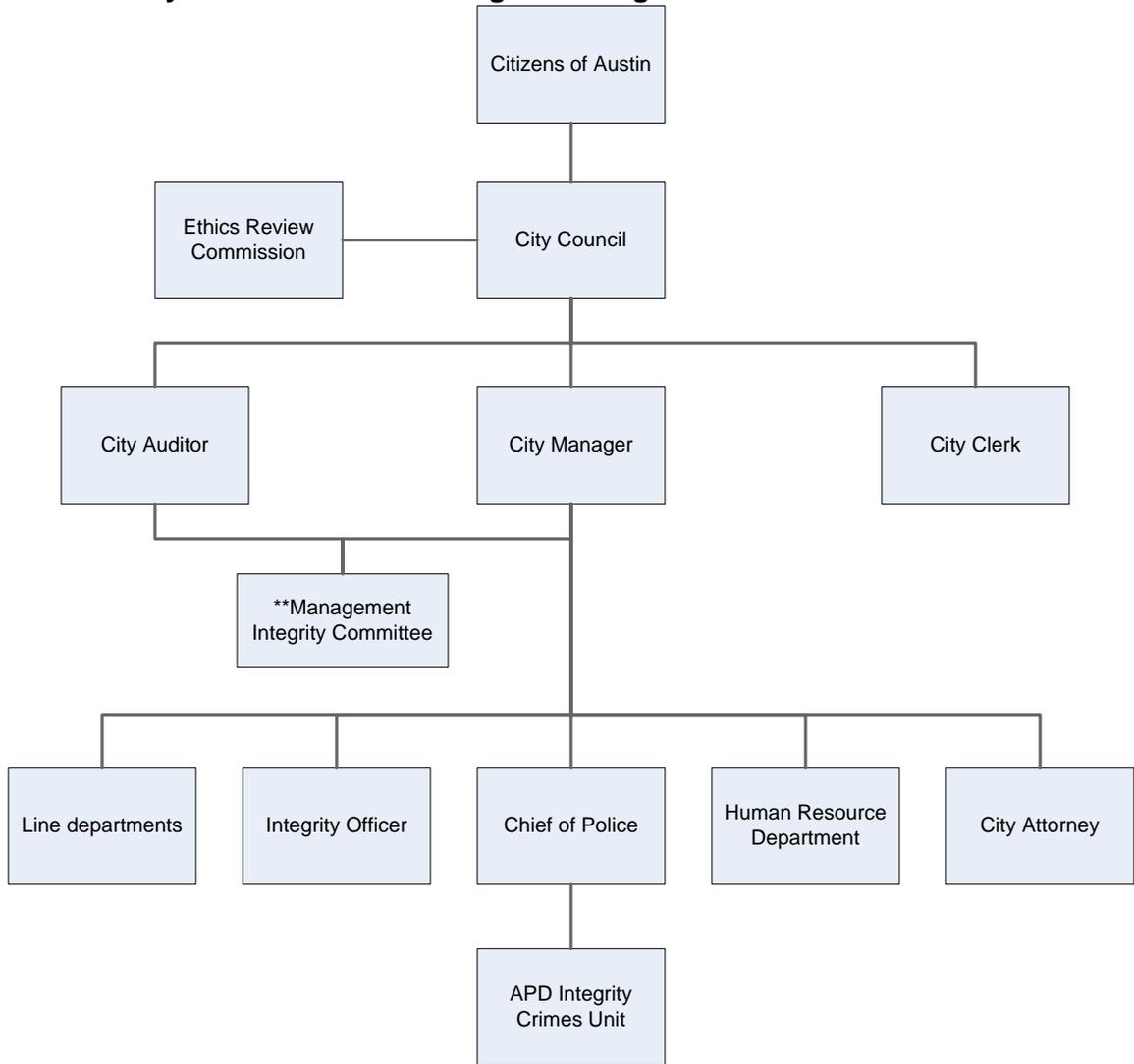
When an investigating entity determines that an integrity/ethics violation has occurred, administrative and/or civil remedies are pursued. These may include disciplinary action such as disciplinary probation, a letter of reprimand, denial of promotion, demotion, suspension or termination, and criminal penalties. Correction roles and actions are mainly assigned by the Fraud, Waste, and Abuse Reporting, Investigation and Prevention Administrative Bulletin; City of Austin personnel policies, and chapter 2-7 of the City Code.

The key entities involved in the administration of this process are the City Council, City Manager's Office, HRD, Ethics Review Commission, and individual departments. HRD and individual departments enforce administrative actions. The District Attorney's office, an outside entity, carries out criminal prosecutions for ethics related criminal cases.

The City of Austin ethics activities are dispersed among various entities.

There are various entities that carry out ethics function within the City. These entities report either to the City Council or the City Manager. Exhibit 2 shows the organizational structure of entities that manage ethics issues in the City.

EXHIBIT 2
City of Austin Ethics Management Organizational Structure



**This committee is made up of a direct report to the Council (the City Auditor) and two reports to City Manager (an Assistant City Manager and the City Attorney)

Source: Chapter 2-7 Austin City Code

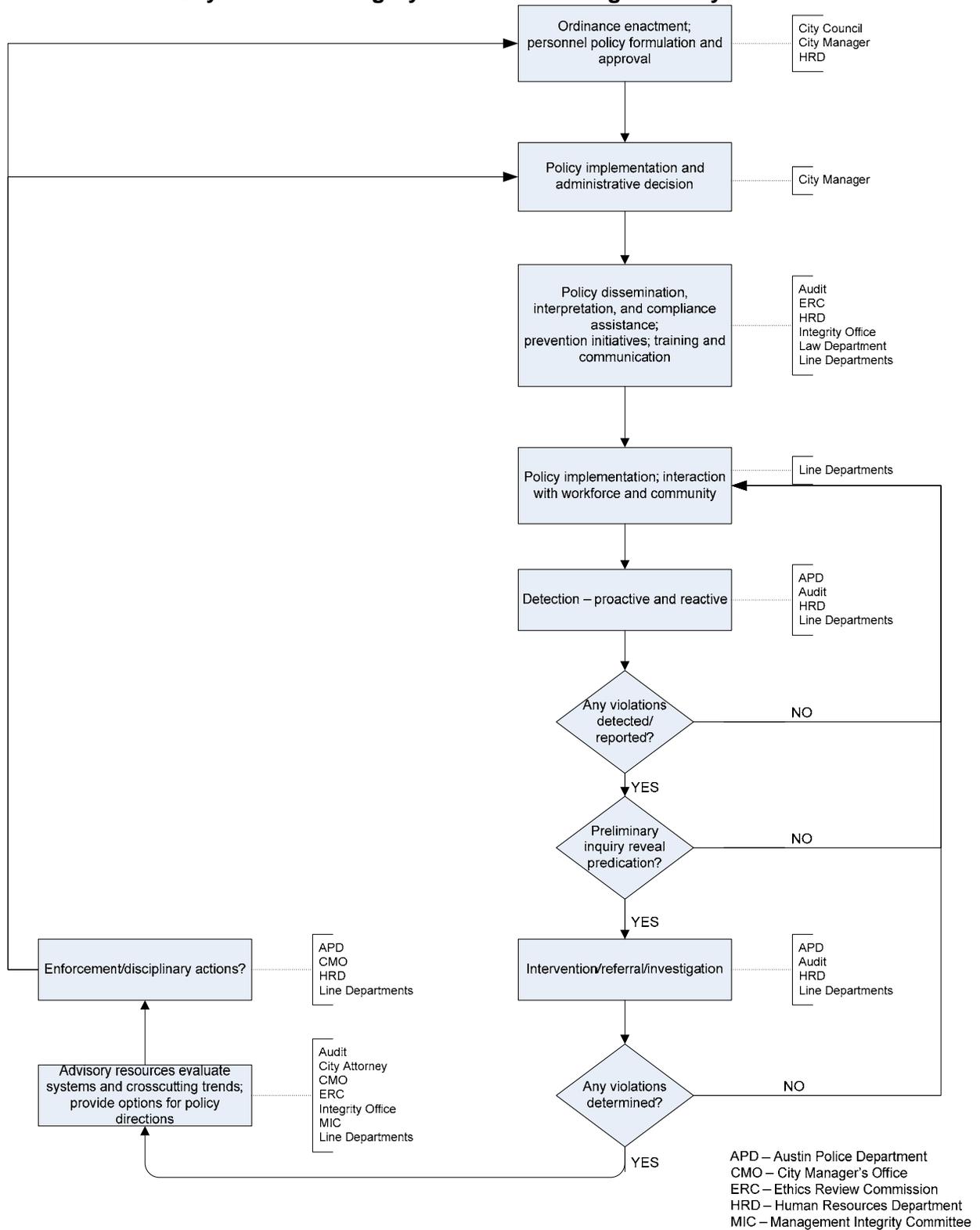
“In order to develop a realistic mission and strategy that is dynamic and ongoing, it may make sense to pull all the ethics resources together for example, through dialogue on the vision or the kind of ethics integrity culture that we want in the City.”
Marc A. Ott – City Manager

The Management Integrity Committee (MIC), through the City's MIC Guidelines 2007, has ethics and integrity oversight responsibilities that allow direct communication and coordination between some of the entities involved in ethics management in the City. For the detailed responsibilities of the Management Integrity Committee refer to Appendix H.

Sustaining the City's Management Integrity Committee is a strategy to ensure ongoing collaboration between the City Manager and the City Auditor to encourage an ethical corporate climate and respond appropriately to integrity violations when they occur
Steve Morgan – City Auditor

Exhibit 3 shows the City of Austin integrity and ethics management system. The exhibit details the processes as well as the different entities that are involved in each system.

EXHIBIT 3 City of Austin Integrity and Ethics Management System



Sources: Management Integrity Committee, City Auditor, and City Integrity Officer

The City of Austin has many elements in its ethical structure many of which are also found in the peer cities’ structures that we surveyed.

The cities in our sample indicated that they have ethics controls in place, which serve to reduce the occurrence of ethics and integrity violations as well as to correct those violations when they are detected within the cities’ workforces. They provided information about their ethics structures covering issues including ethics oversight, ethics initiative focus, activities regulated, Ethics Officer or equivalent, Ethics Review Commission, City Auditor, Human Resources, ethics training, and disclosure of financial information. However, we make no judgment on the efficacy of any controls or any combination of controls contained in this survey. Below is a description of the responses from the cities.

(1) Oversight- All seventeen cities that responded to the survey indicated that they each have several entities that manage ethics activities in the cities. Out of the seventeen, eight cities said that they have a single person/group that works full-time on overseeing the entire ethics structure. Austin, along with eight other cities, does not have such a person or group. We make no judgment here as to which structure is more appropriate.

(2) Ethics initiatives main focus - The cities that responded to the survey indicated that their ethics initiatives are focused on different categories of people. Twelve cities said that their ethics initiatives focus mainly on elected officials, employees, and department heads. Exhibit 4 below shows the number of cities with the categories of people their efforts are focused on.

**EXHIBIT 4
Ethics Initiatives Main Focus**

Number of cities	Category of people
12	Elected officials, employees, and department heads
2	Employees and department heads
1	Elected officials and employees
1	Elected officials, and department heads

Includes Austin

Source: OCA ethics structure survey

(3) Ethics activities regulated by the cities - Ethics activities regulated by the cities that responded to the survey included those related to procurement practices, open government, political activities of employees, lobbying of elected officials, campaign finance, conflict of interest, gifts, use of city equipment, and use of city funds. Exhibit 5 shows the activities regulated by each city.

EXHIBIT 5
Ethics Activities Regulated by Austin and Peer Cities

	Procurement practices	Open Government	Political activities of employees	Lobbying of elected officials	Campaign finance	Conflict of interest	Gifts	Use of city equipment	Use of city funds
AUSTIN									
Arlington									
Dallas									
El Paso									
Fort Worth									
Houston									
San Antonio									
Atlanta									
Jacksonville									
Kansas									
Memphis									
Minneapolis									
Oklahoma									
Phoenix									
San Diego									
San Jose									
Seattle									

Source: OCA ethics structure survey (the colored boxes represent ethics activities regulated by each city)

(4) Ethics officer or equivalent person - Ten cities including Austin indicated that they have an ethics officer or an equivalent person working on ethics issues. Out of these cities, five, including Austin, said that this person works full-time on ethics issues. One city, Jacksonville, Florida reported a structural component that no other city in the survey has. They reported that each department in the city has its own Inspector General and Departmental Ethics Officer. The ten cities that have an ethics officer or equivalent person also provided information about that person’s reporting structure. Exhibit 6 shows the different cities that answered that they had an ethics officer or equivalent position and those that said such a person works full time on ethics issues.

EXHIBIT 6
Ethics Officer or Equivalent

City	Ethics Officer	Works fulltime on ethics issues	City	Ethics Officer	Works fulltime on ethics issues
AUSTIN			Kansas		
Arlington,			Memphis		
Dallas			Minneapolis		
El Paso			Oklahoma		
Fort Worth			Phoenix		
Houston,			San Jose,		
San Antonio			San Diego		
Atlanta			Seattle		
Jacksonville					

Source: OCA ethics structure survey (the colored boxes represent the cities that have an ethics officer or equivalent person position and whether such a person works fulltime on ethics issues)

Ethics activities of the ethics officer or equivalent person - The activities for the ethics officer or an equivalent person varied for all cities. However, 50 percent of the cities said that the ethics officer is involved in policy creation, policy interpretation, and advisory activities. Exhibit 7 shows our analysis for all cities.

EXHIBIT 7
Activities in Which the Ethics Officer or Equivalent is Involved

	Policy creation	Policy implementation	Policy interpretation	Prevention activities	Proactive detection	Reactive/ Investigation	Enforcement	Advisory
AUSTIN								
Arlington								
Dallas								
El Paso								
Fort Worth								
Houston								
San Antonio								
Atlanta								
Jacksonville								
Kansas								
Memphis								
Minneapolis								
Oklahoma								
Phoenix								
San Diego								
San Jose								
Seattle								

Source: OCA ethics structure survey (the colored boxes represent activities in which the ethics officer or equivalent is involved for each city)

Reporting structure of the ethics officer or equivalent person - The ethics officer or equivalent person, for each of the ten cities that responded to this question on the survey, reports to different people or committees. Exhibit 8 shows a summary of the reporting structure of this ethics officer position for the ten cities.

EXHIBIT 8

The Reporting Structure of the Ethics Officer or Equivalent

City	City Council	City Manager	Mayor	City Attorney	Other Board/Commission
AUSTIN					
Arlington					
Dallas					
El Paso					
Fort Worth					
Houston,					
San Antonio					
Atlanta					
Jacksonville					
Kansas					
Memphis					
Minneapolis					
Oklahoma					
Phoenix					
San Jose,					
San Diego					
Seattle					

Source: OCA ethics structure survey

(5) Ethics Commission/committee or similar body - Sixteen cities indicated that they have an ethics commission/committee, or a similar body that addresses ethics issues related to elected officials. The cities also provided information about the ethics activities as well as the authority of this body.

Ethics activities of the ethics commission or similar body - The activities of such a body varied for the sixteen that reported having one. Exhibit 9 summarizes the answers provided by the respective cities.

EXHIBIT 9

Ethics Activities Where the Ethics Commission/Committee or Similar Body is Involved

	Policy creation	Policy implementation	Policy interpretation	Preventive activities	Proactive detection	Reactive/ Investigation	Enforcement	Advisory
AUSTIN								
Arlington								
Dallas								
El Paso								
Fort Worth								
Houston								
San Antonio								
Atlanta								
Jacksonville								
Kansas								
Memphis								
Minneapolis								
Oklahoma								
Phoenix								
San Diego								
San Jose								
Seattle								

Source: OCA ethics structure survey (the colored boxes represent activities in which the ethics commission or similar body is involved for each city)

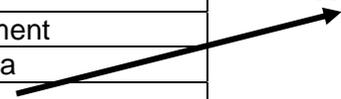
Authority of the ethics commission/committee or similar body - Out of the sixteen cities that reported having an ethics commission/committee or similar body, eight indicated that this body has investigative, legislative, and subpoena authority. Austin Ethics Review Commission only has investigative and enforcement authority. Exhibit 10 shows the number of cities and the types of authority for the ethics commission/committee or a similar body.

EXHIBIT 10

Authority of the Ethics Commission/Committee or Similar Body

Number of cities	Type of authority
6	Investigative, enforcement, and subpoena
1	Enforcement and Subpoena
1	Investigative, legislative, and enforcement
1	Investigative, legislative, and subpoena
1	Investigative, and enforcement
4	Investigative
2	None of the above

Includes Austin



Source: OCA ethics structure survey

(6) City Auditor - All the seventeen cities that responded to the survey said that they had a City Auditor. These cities also answered questions regarding the activities, authority, and reporting arrangement of the City Auditor; and the number of people who report to the City Auditor.

Ethics activities of the City Auditor - Seven cities indicated that the City Auditor is not involved in the city's ethics activities. Ten cities, including Austin, said that the city auditor is involved in some ethics activities including policy creation, interpretation, and

implementation; preventive activities; proactive and reactive detection; investigation; enforcement; and advisory services. These activities varied from city to city. Exhibit 11 below shows these activities for each city.

**EXHIBIT 11
Ethics Activities of the City Auditor**

	Policy creation	Policy implementation	Policy interpretation	Preventive activities	Proactive detection	Reactive/Investigation	Enforcement	Advisory
AUSTIN								
Arlington								
Dallas								
El Paso								
Fort Worth								
Houston								
San Antonio								
Atlanta								
Jacksonville								
Kansas								
Memphis								
Minneapolis								
Oklahoma								
Phoenix								
San Diego								
San Jose								
Seattle								

Source: OCA ethics structure survey (the colored boxes represent activities in which the city auditor is involved for each city)

Reporting - Out of the seventeen cities twelve indicated that the city auditor reports to the City Council or an Audit Committee; Austin is among these cities. Exhibit 12 shows the reporting relationship of the City Auditor for the responding cities.

**EXHIBIT 12
The Reporting Structure of the City Auditor**

Number of cities	Reporting relationship
12	City Council or an Audit Committee
2	City Manager
1	City Council and City Manager
1	Chief Operating Officer
1	Board of Estimate and Taxation

Source: OCA ethics structure survey

Authority of the City Auditor over ethics violations- Out of the thirteen cities that answered this section, twelve cities including Austin indicated that the City Auditor has only investigative authority. One city, Oklahoma City, said that the City Auditor has both investigative and enforcement authority.

Number of employees who report to the city auditor - This varied between none and more than twenty five. Exhibit 13 shows the number of people who report to the city auditor for the sixteen cities.

EXHIBIT 13
Number of People Who Report to the City Auditor

Number of cities	Number of people
6	More than twenty five
3	Sixteen to twenty-five
5	Six to fifteen
2	Two to five
1	None

Includes Austin

Source: OCA ethics structure survey

(7) **Human Resources** - Fifteen cities, including Austin, in our sample indicated that they have a Human Resources Department that handles some ethics activities. Exhibit 14 shows the activities handled by the Human Resources Department for each of the thirteen cities.

EXHIBIT 14
Ethics Activities of the Human Resources Departments

	Policy creation	Policy implementation	Policy interpretation	Preventive activities	Proactive detection	Reactive/Investigation	Enforcement	Advisory
AUSTIN								
Arlington								
Dallas								
El Paso								
Fort Worth								
Houston								
San Antonio								
Atlanta								
Jacksonville								
Kansas								
Memphis								
Minneapolis								
Oklahoma								
Phoenix								
San Diego								
San Jose								
Seattle								

Source: OCA ethics structure survey. (The colored boxes represent activities in which HRD is involved for each city.)

(8) **Ethics training** – Out of the seventeen cities that responded to this section, fifteen cities, including Austin, provide ethics training for city employees. Out of these cities, two indicated that they require additional periodical ethics training. Additionally out of these seventeen cities, fifteen indicated that they provide ethics training to the city’s elected officials. Two cities, including Austin do not require ethics training for elected officials. However, the City’s Integrity Officer prepares a handbook “Ethics Overview for Councilmembers” and provides one to each Council Member’s office. Additionally, the State of Texas requires training for certain elected officials on topics such as the Texas Open Meeting s Act. Exhibit 15 shows our compilation of this information.

The State of Texas requires new officers/elected officials – or their designee to view a video on Texas law regarding Open Meetings and Public Information. Information regarding this training can be accessed at http://www.oag.state.tx.us/open/og_training.shtml

**EXHIBIT 15
City Mandated Ethics Training**

City	Ethics training provided to all employees	Ethics training for elected officials	Follow-up ethics training for all city employees required
Austin			
Arlington			
Dallas			
El Paso			
Fort Worth			
Houston			
San Antonio			
Atlanta			
Jacksonville			
Kansas			
Memphis			
Minneapolis			
Oklahoma			
Phoenix			
San Jose			
San Diego			
Seattle			

Source: OCA ethics structure survey. (The colored boxes indicate that the city provide the training.)

Appendix G shows our summary compilation of the ethics structure survey for the different cities that responded to the survey. Appendix I shows the detailed responses of the cities that participated in the survey.

APPENDIX A

Shows a detailed list of City of Austin policies including the procedures and guidelines as well as the administrative bulletins

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Appendix A shows the detailed list of City of Austin policies. These include the procedures and guidelines as well as the administrative bulletins

City of Austin Detailed List of Policies

Procedures & Guidelines

Title	Effective Date	Revision Date	Review Date
Accrued Leave Administration	10/1/2004	N/A	N/A
Acting Pay	4/7/2004	N/A	N/A
Cell Phone Procedure & New Blackberry Procedure	2/15/2001	1/9/2008	5/4/2004
Compensatory Time	11/5/1997	N/A	11/5/2003
Conducting Criminal Background Investigations: Working with Children	(Rescinded 11/1/2004)	N/A	4/17/2004
Conducting Criminal Background Investigations: General Guidelines	11/1/2004		
Criteria for CBI Reviews: Working with Children	11/1/2004		
Drug and Alcohol Testing	1/1/1995	1/22/2001	1/22/2003
Employment Application Processing	10/22/2002		10/22/2003
Establishing Base Pay (Interim Procedure)	4/17/2003		4/17/2004
City Manager's Gift Memo	12/4/2002		
Grievance Procedures	08/01/96 (to be rescinded by 11/30/04)	N/A	8/1/2005
Military Leave	7/9/2004	11/29/2007	7/9/2005
New Hire Process	11/15/2007	NA	NA
On-Call and Call-Back Pay	2/17/1999	3/11/2001	3/11/2004
Reduction in Force	6/11/2001	1/23/2002	1/23/2003
Shared Accrued Leave Program	2/18/2005	N/A	2/18/2006
Extended Use of Accrued Leave: Leave Donation			
SSPR Procedures	6/22/2001		6/22/2003
Telework	6/30/1999		6/30/2003
Travel Guidelines	1/1/2004		
Travel Policy and Procedure (Controllers Office)			
Travel Guidelines (Budget Office)			
Tuition Reimbursement	8/16/2001		8/16/2002
Vehicle Collision Review Board (VCRB)	7/24/2002		7/24/2003
Volunteer Management for AISD/COA Mentoring Partnership)	12/8/2003	7/9/2004	12/8/2004
Risk Management Procedures			
Executive (Volume One)			
Administrative (Volume Two)			
Employee (Volume Three)			
Driver Safety Program (Volume Four)			
Worker's Compensation Procedures (Volume Five)			

City of Austin Administrative Bulletins			
Title	Number	Effective Date	Revised Date
Acceptable Internet Use	98-06	11/27/2007	11/18/2006
Acceptance and Use of Admission or Tickets	07-08	7/17/2007	7/17/2007
Administrative Leave: Declaration of Approved Purposes	91-02	11/1/2005	11/26/2007
Authorized Use of Public Funds for Employee Recognition Events; Commemorative Retirement Gifts, Chairitable Events; and Gratuities	07-07	7/17/2007	7/17/2007
Business Expense Reimbursement	07-11	12/1/2007	12/1/2007
Career Development Services	07-12	11/29/2007	11/29/2007
Cash Handling Policy	92-02	9/1/1992	2/11/2008
City Mail Distribution Services	83-01	12/1/2007	11/26/2007
City Purchases from Organizations for Persons With Disabilities	83-16	12/1/2007	11/26/2007
Citywide Credit Card Policy	95-04	11/30/2007	11/30/2007
Commercial Driver Motor Vehicle Inspection Policy	07-03	11/1/2007	11/1/2007
Contact With Council Offices: Responding to Requests for Information and Requests for Assistance	82-06	8/17/2007	8/17/2007
Coordination of Construction Projects, Excavation and Activities In the Public Right-of-way	99-01	10/1/1999	10/1/1999
Coordination of Department Reorganizations	83-10	5/1/1983	5/1/1983
Co-Sponsorship of Employee Heritage Events	07-02	7/17/2007	7/17/2007
Delegation of City Manager's Signature Authority	03-01	11/7/2007	11/11/2007
Departmental Personnel Action and Grievance Requirements	95-01	11/26/2007	11/26/2007
Designation of Energy Manager and Establishment of Energy Efficiency Policy	05-01	2/1/2005	2/1/2005
Developing and Constructiong Architectural (Building) Projects	85-02	2/1/1985	2/1/1985
Discipline for Violations of Alcohol & Drug Policy for Commercial Motor Vehicle Drivers Personnel Procedures: Alcohol & Drug Testing Procedures	94-02	11/26/2007	11/26/2007
Disposal of Surplus and Outdated Fire Fighting Equipment	04-02	1/15/2004	1/30/2008

City of Austin Administrative Bulletins			
Title	Number	Effective Date	Revised Date
Disposition of Abandoned or Unclaimed Property	83-06	5/30/2007	7/6/2007
Emergency Closures (Bad Weather Pay)	85-01	12/5/2005	1/30/2008
Employee Identification Badges	84-10	7/31/1984	11/26/2007
Employee Participation in Public Auction	95-07	12/14/1995	2/1/2008
Employee Relocation Assistance Program	83-07	10/21/1994	11/26/2007
Employee Vehicle Policy	95-06	5/1/1995	2/1/2008
Fraud, Waste, and Abuse Reporting Investigation and Prevention	06-03	8/20/2007	8/20/2007
Guidance for Using City Funds to Buy Meals for City Employees	06-02	11/27/2006	11/27/2006
Guidelines for Formal City Receptions and Dedications	84-05	5/8/2007	5/8/2007
Guidelines for the City of Austin Combined Charities Campaign	07-05	7/17/2007	7/17/2007
Guidelines for Non-City Use of City Hall	06-01	7/7/2006	11/28/2007
Guidelines for Preparing Administrative Bulletins	PREFACE	2/12/2008	2/12/2008
Guidelines for Wearing of Pins, Logos, Insignias, or Buttons on City Uniforms	84-01	3/30/1984	8/20/2007
Guidelines and Work Process for Handling Austin Energy's Confidential Information	02-02	11/14/2002	2/10/2003
Information Security	98-04	11/1/2007	11/1/2007
Internal City Notification Policy	94-03	8/20/2007	7/1/2007
Internship Program	07-01	7/17/2007	7/17/2007
Nepotism	07-10	2/1/2008	2/1/2008
Operating City Vehicles and Equipment	82-01a	3/29/1982	1/1/1996
Operating and Refueling Alternately Fueled Vehicles	01-01	11/30/2007	11/30/2007
Personal Vehicle Use Reimbursement	84-04	12/1/2007	12/1/2007
Petty Cash Policy	93-01	12/1/2007	12/1/2007
Purchasing and Contracting Authority and Related City Charter Requirements	84-07	12/1/2007	12/1/2007
Procedures for Developing Building Dedication Plaques	87-01	3/16/1987	3/16/1987
Reasonable Accommodation Procedure	95-05	1/1/1996	11/26/2007
Reassignment and Reissue of Turned-in Auction Vehicles	02-01	6/13/2002	6/13/2002

City of Austin Administrative Bulletins			
Title	Number	Effective Date	Revised Date
Records Center Storage Costs	02-03	11/18/2002	11/18/2002
Records Management of City Council Approved Contracts	01-02	10/25/2001	10/25/2001
Retaliation	07-09	2/1/2008	2/1/2008
Return to Work Procedures	91-04	11/1/1991	11/26/2007
Roles and Responsibilities for Financial Management	08-01	2/4/2008	2/4/2008
Service by City Employees on City Boards	07-04	7/2/2007	7/2/2007
Solicitation of Gifts, Contributions, or Items of Value by City Employees	07-06	7/17/2007	7/17/2007
Telephone Protocol	98-02	5/1/1998	11/26/2007
Terminating City Non-Civil Service Employees Appointed as Fire or Police Cadets	85-03	9/2/2002	1/30/2008
Training Records and Protocol	98-07	12/1/2007	12/1/2007
Use and Composition of Memoranda and Letters Written for the Manager's Signature	82-05	4/28/1982	2/15/2008
Use and Employment of Legal Services	85-04	6/1/1985	6/1/1985
Use of City Resources by Non-Civil Service Employees	98-01	1/1/1998	11/26/2007
Use of Internal Communications System	05-02	3/2/2005	3/2/2005
Using and Protecting City Vehicles and Equipment	82-01	3/29/1982	1/1/1996
Vehicle and Equipment Turn-in Policy	96-02	11/30/2007	11/26/2007
Voicemail Protocol	96-01	6/5/1996	2/15/2008
Year End Physical Inventory Counting for Non-AIMS Warehouses	82-10	12/1/2007	12/1/2007

Source: HRD Website <http://inside/hr/hrpolicy.cfm>

APPENDIX B

Policy Creation - Functional Responsibilities of the entities

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APPENDIX B
Policy Creation - Functional Responsibilities of the entities

<p><i>General integrity/ethics guidance is provided in the form of City Ordinances and Personnel Policies. Policy direction can also be derived from federal or state laws. Primary entities involved in policy creation and policy guidance include the City Council and City Manager.</i></p>	
Entity/ Position	Roles/responsibilities
City Council	<ul style="list-style-type: none"> ▪ Is the Legislative body of the City and enacts City ordinances and approves personnel policies. <i>(City Charter Chapter IX, Section 3)</i>
City Manager	<ul style="list-style-type: none"> ▪ Under the City Charter (<i>Chapter V Section 2</i>), the City Manager is responsible “for the proper administration of all affairs of the city.” ▪ Promulgates personnel policies, subject to ratification by the Council ▪ Promulgates Administrative Bulletins. These are standard operating procedures for City employees
HRD	<ul style="list-style-type: none"> ▪ Promulgates personnel policies with the City Manager and Council approval
<p>Management Integrity Committee Ethics Review Commission Ethics Officer City Manager’s Office Line Departments City Attorney Office of the City Auditor Corporate Internal Audit</p>	<p>When integrity violations or ethics breakdowns occur, various entities in the City are responsible for assessing the causes and recommending decisions/actions to close gaps at the policy level.</p> <ul style="list-style-type: none"> ▪ The Management Integrity Committee identifies trends, and provides advice through the Assistant or Deputy City Manager. ▪ The Ethics Review Commission, Ethics Officer, and the City Manager’s office team conducts gap analysis, formulates policy options, and proposes/recommends policies and procedures related to preventive, detective. And corrective internal controls. ▪ Line Departments propose policy options or formulate internal departmental policies to address ethics-related issues at the departmental level ▪ The Management Integrity Committee guidelines require HRD to create an “integrity/personnel cases data base” for assessing trend information, ongoing risks. The database is supposed to be a source of information for creating periodic or ad hoc reports to be used by the MIC. The database exists, but is incomplete. ▪ The City Auditor, through reports provides recommendations for policy changes ▪ APD’s criminal investigation unit conducts investigations and passes on their findings to City groups such as the Management Integrity Committee.

Source: OCA compilation of the ethics roles of the City resources

APPENDIX C

Policy Implementation - Functional Responsibilities of the Entities

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APPENDIX C

Policy Implementation - Functional Responsibilities of the Entities

Entity/ Position	Roles/responsibilities
City Manger	<p>Under the City Charter the City Manager is responsible "for the proper administration of all City Affairs"</p> <ul style="list-style-type: none"> • Provides overall direction to the City of Austin's management integrity/ethics initiative • Implements policy through administrative bulletins, standard operating procedures, and day-to-day management decisions
City departments	<p>Primary entities are City departments who provide municipal services, apply regulation to the community, and contract for goods and services</p> <ul style="list-style-type: none"> • City departments design and implement ethics controls, i.e., departmental rules, processes, policies, procedures, remedies, initiatives, and programs

Source: OCA compilation of the ethics roles of the City resources

APPENDIX D

Policy Dissemination, Interpretation and Compliance Assistance - Functional Responsibilities of the entities

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APPENDIX D
Policy Dissemination, Interpretation and Compliance Assistance - Functional Responsibilities of the Entities

Primary contributing resources include Integrity office, HRD, Law Department, and Office of the City Auditor. Secondary resources include the Ethics Review Commission, District Attorney's Office, and other outside entities with authority or expertise in integrity/ethics

Entity/ Position	Roles/responsibilities
Integrity Office	<ul style="list-style-type: none"> • Is the central resource on ethics - answers questions on Government ethics and public integrity; provide ethics training to City work groups on request; creates and revises ethics policies for the City (subject to approval from the City Council) • Reviews and interprets existing policies, administrative bulletins, and other ethics guidance • Integrity Office web page lists a "click on" for getting ethics information and guidance • Maintains information regarding the departments that receive ethics training from the Integrity officer, the number of employees trained, and the dates when these employees were trained
Human resource Department	<ul style="list-style-type: none"> • Provides supervision; administers the Personnel Policies and the grievance procedures; and conducts ethics training for City work groups • HR has posted the policies and administrative bulletins on the City website and also provides online newsletters concerning personnel policies and issues
Law Department	<ul style="list-style-type: none"> • Interprets and advises on legal matters
Office of the City Auditor	<ul style="list-style-type: none"> • City Auditor issues reports to provide criteria for expected compliance with rules, regulations, procedures, etc
City Attorney	<ul style="list-style-type: none"> • Has some specific ethics related duties under chapter 2-7 of the City Code - Provides • support to the ERC; may issue opinions on the meaning of chapter 2-7; an employee who has relied on a City Attorney opinion may be represented by the City Attorney on a complaint pending before the ERC
Ethics Review Commission	<ul style="list-style-type: none"> • Considers amendments to the Ethics Ordinance

Source: OCA compilation of the ethics roles of the City resources

APPENDIX E

Detection/investigation of ethics violations - Functional responsibilities of the entities

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APPENDIX E

Detection/Investigation of Ethics Violations - Functional Responsibilities of the Entities

Entity/ Position	Roles/responsibilities
APD	<ul style="list-style-type: none"> • APD Criminal Investigation Unit investigates criminal violations by City employees • Internal Affairs handles investigations on ethics issues involving APD staff
HRD	<ul style="list-style-type: none"> • HRD administers Listening to the Workforce Survey annually to all employees and all departments. The survey identifies the attitudes of the employees towards their work environment. It lists five ethics related questions • Investigates routine personnel issues such as employee grievances or complaints relating to civil rights and equal employment
Corporate and other internal City auditors	<ul style="list-style-type: none"> • Through their audit responsibilities, may detect and assess potential integrity violations
Office of the City Auditor	<ul style="list-style-type: none"> • Office of the City Auditor has established detection tools such as an effective hotline (available twenty four hours, seven days a week), a marketing initiative to encourage reporting of potential integrity violations (City's internal website lists OCA and a "click on" icon for reporting fraud, waste, and abuse). • OCA has implemented a proactive project to identify red flags (internal control review initiatives and fraud detection projects such as the "One detection data mining project"). • OCA annual project planning process includes risk and vulnerability procedure, which may identify "red flags" requiring further assessment • The Yellow Book 2007 chapter 6 requires auditors, when planning an audit, to "design the engagement to provide reasonable assurance of detecting fraud, illegal acts, or violations of provisions."

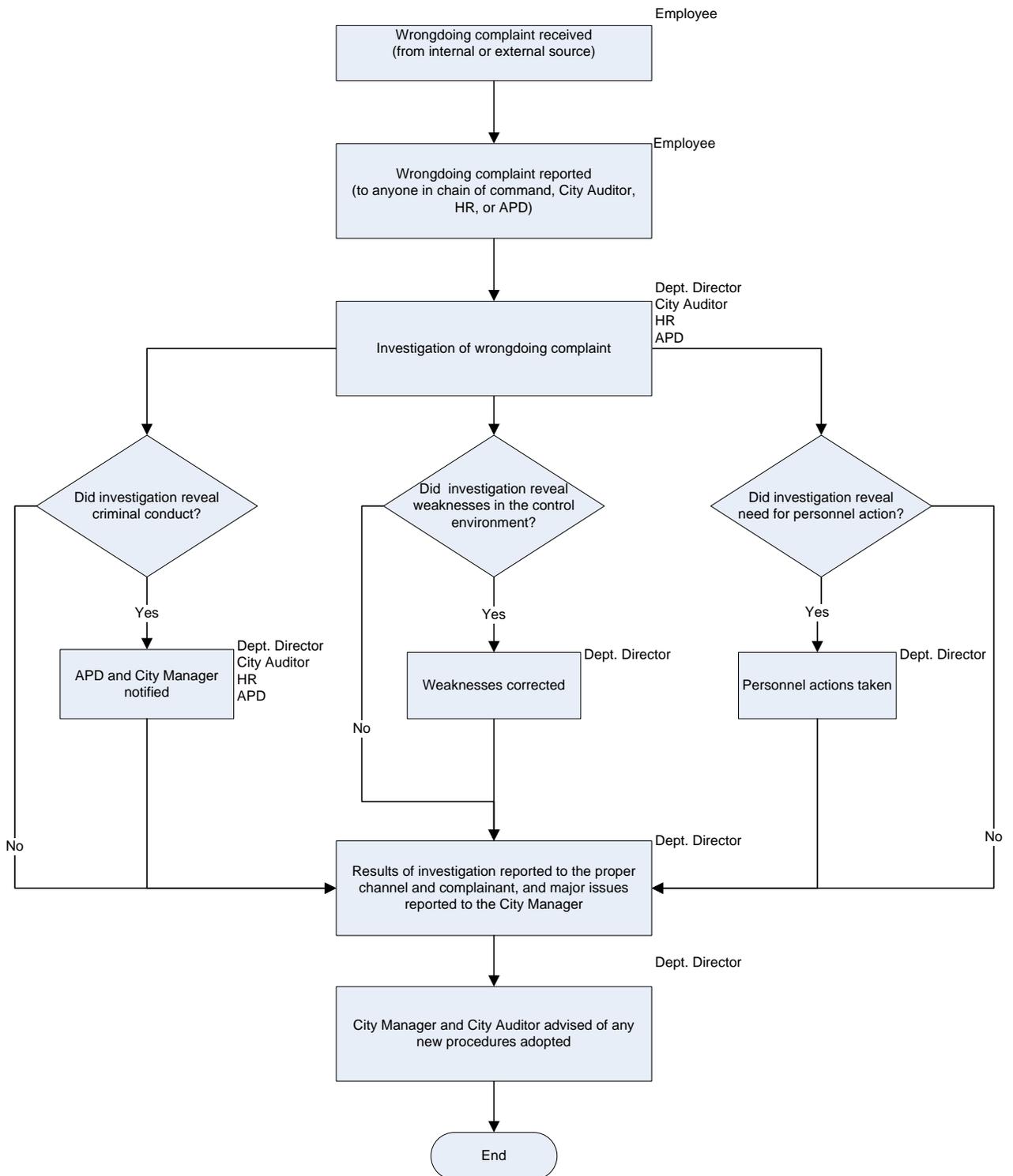
Source: OCA compilation of the ethics roles of the City resources

APPENDIX F

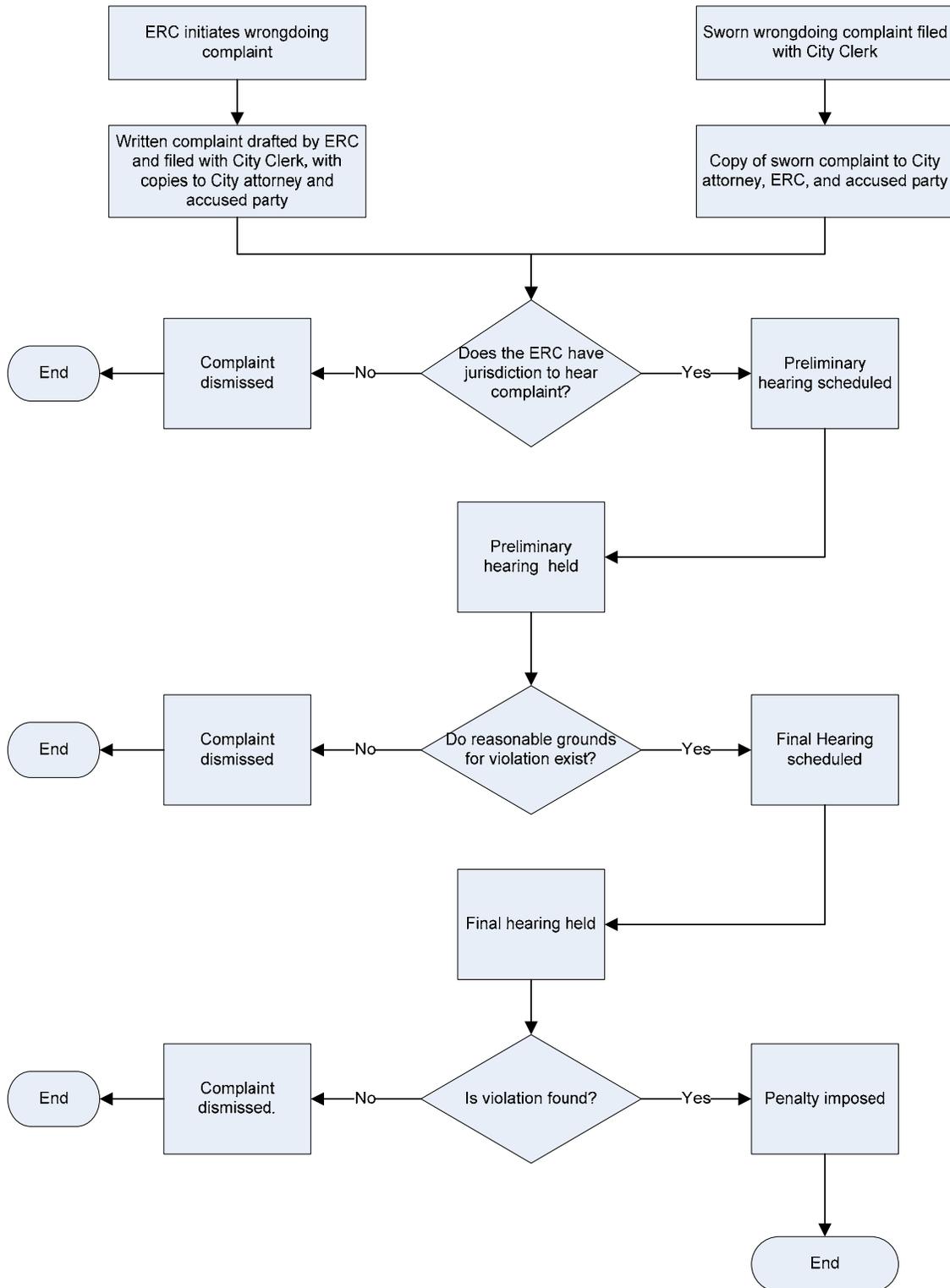
Ethics enforcement processes used by City Management and the Ethics Review Commission

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APPENDIX F The City of Austin Management Ethics Enforcement Process



APPENDIX F
City of Austin Ethics Review Commission Ethics Enforcement Process



SOURCE: Chapter 2-7 City Code

APPENDIX G

Elements in Other Cities' Ethics Structures

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APPENDIX G
Elements in Other Cities' Ethics Structures

		AUSTIN	Arlington	Dallas	El Paso	Fort Worth	Houston	San Antonio	Atlanta	Jacksonville	Kansas	Memphis	Minneapolis	Oklahoma	Phoenix	San Diego	San Jose	Seattle	
Questions																			
What type of governance structure do you have?	Council/manager (weak mayor)																		
	Strong mayor																		
	Mayor / Council																		
Do you have a single person/ group responsible for oversight of the entire ethics structure for your city?																			
ETHICS OFFICER OR SIMILAR PERSON																			
Do you have an ethics officer or an equivalent?																			
Does this person work on ethics issues: Fulltime?																			
What is this position called?	Ethics/Integrity Officer																		
	Coordinator/Compliance Officer/Director																		
	Ethics Committee																		
To whom does this person report?	City Council																		
	City Manager																		
	Mayor																		
	City Attorney																		
	Other Board/Commission																		
What activities is this person involved in? Please, select all that apply:	Policy creation																		
	Policy implementation																		
	Policy interpretation																		
	Prevention activities																		
	Proactive detection																		
	Reactive detection																		
	Investigation																		
	Enforcement																		
	Advisory																		
What sort of authority does this person have?	Investigative authority																		
	Enforcement authority																		
	Subpoena																		
	Disciplinary																		
	Advisory																		
	Legislative authority																		
How many employees does this person have reporting to	None																		
	Only one																		
	Two-five																		

		AUSTIN	Arlington	Dallas	El Paso	Fort Worth	Houston	San Antonio	Atlanta	Jacksonville	Kansas	Memphis	Minneapolis	Oklahoma	Phoenix	San Diego	San Jose	Seattle	
Questions																			
him/ her?	Five-ten																		
How does this person become aware of ethics issues that require his/her attention or action?	Hotline																		
	Inquiries																		
	Filed complaints																		
	Emails/reports/news papers																		
Is that person responsible for managing other function?																			
ETHICS COMMISSION OR SIMILAR BODY																			
Do you have a committee, commission or other body that addresses ethics issues related to elected officials?																			
Is this body established/ required by	City Charter																		
	City Ordinance																		
	State Law																		
	City manager																		
What activities is this group involved in? Please, select all that apply:	Policy creation																		
	Policy implementation																		
	Policy interpretation																		
	Preventive activities																		
	Proactive detection																		
	Reactive																		
	Investigation																		
	Enforcement																		
What sort of authority does this group have?	Advisory																		
	Investigative authority																		
	Enforcement authority																		
	Subpoena																		
How often does this group meet?	Legislative authority																		
	Monthly or more often																		
	Quarterly																		
How does this group become aware of the issues that require their attention?	As needed																		
	Complaints																		
	Council direction																		
	Hotline																		
	Media/ethics officer																		
	Advisory requests																		
Reviews of best practice																			
CITY AUDITOR																			
Do you have a city auditor?																			
How many	None																		

		AUSTIN	Arlington	Dallas	El Paso	Fort Worth	Houston	San Antonio	Atlanta	Jacksonville	Kansas	Memphis	Minneapolis	Oklahoma	Phoenix	San Diego	San Jose	Seattle
Questions																		
employees report to the city auditor?	Two-five																	
	Six-fifteen																	
	Sixteen-twenty five																	
	More than twenty five																	
To whom does the city auditor report?	Audit committee																	
	City Council																	
	City Manager																	
	Other Person/Board/s																	
	Mayor																	
What activities related to ethics is the city auditor involved in?	Policy creation																	
	Policy implementation																	
	Policy interpretation																	
	Preventive activities																	
	Proactive detection																	
	Reactive detection																	
	Investigation																	
	Enforcement																	
	Advisory																	
What sort of authority does this office have?	Investigative authority																	
	Legislative authority																	
	Enforcement authority																	
	Subpoena																	
How do ethics issues come to the attention of the city auditor?	Hotline																	
	Proactive detection																	
	Audits																	
	Citizen complaints/emails																	

HUMAN RESOURCES

What activities related to ethics is HR involved in?	Policy creation																	
	Policy implementation																	
	Policy interpretation																	
	Preventive activities																	
	Proactive detection																	
	Reactive detection																	
	Investigation																	
	Enforcement																	
	Advisory																	
How do ethics issues come	Inquiries																	
	Hotline																	

		AUSTIN	Arlington	Dallas	El Paso	Fort Worth	Houston	San Antonio	Atlanta	Jacksonville	Kansas	Memphis	Minneapolis	Oklahoma	Phoenix	San Diego	San Jose	Seattle
to the attention of Human Resources?	Complaints/grievances																	
	Media/ethics officer																	
	Program/reports/audits																	

POLICIES

Do you have formal policies and procedures in place that set forth ethics expectations for your employees?																		
--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--

ETHICS INITIATIVES FOCUS

Who does your city's ethics initiatives focus on?	Elected officials																	
	Employees																	
	Department heads																	
Does your city regulate ethics related to:	Procurement practices																	
	Open Government																	
	Political activities of employees																	
	Lobbying of elected officials																	
	Campaign finance																	
	Conflict of interest																	
	Gifts																	
	Use of city equipment																	
	Use of city funds																	
Which of the following are required by state law?	Ethics training																	
	Ethics officer position																	
	Ethics Commission or similar body																	
What ethics publications other than formal policies do you have	Website																	
	Electronic (VHS, video)																	
	Publications/training materials																	
	Policy statements																	
Does your organization provide ethics training to city employees?																		
Does your organization provide ethics training to elected officials?																		
Does your city have any other functions that deal with ethical issues that we have not discussed above?																		

SOURCE: OCA compilation of ethics structure survey

** The response for the City of Austin was provided by the City's Ethics Officer

 Exists in the city ethics structure

APPENDIX H

**MANAGEMENT INTEGRITY COMMITTEE OPERATING
GUIDELINES**

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City of Austin

Management Integrity Committee

Committee Members: City Auditor, Designated Assistant City Manager, and City Attorney

Designated Substitutes: Assistant City Auditor for Integrity and Deputy City Auditor, Substitute Assistant City Manager, and Substitute Assistant City Attorney

Required Attendees: One representative from each of the following: City Auditor's Integrity Unit (CAIU), Austin Police Department's (APD) Integrity Unit, Human Resources Department's (HRD) Employee Relations Division, HRD's Executive Staff, Corporate Internal Auditor's Office, and City's Integrity Officer

2007-2008 Operating Guidelines

I. Applicability: these guidelines are applicable to Committee Members, Designated Substitutes, and Required Attendees.

II. Purpose:

- a. Ensure clear communication and coordination of City investigations involving integrity violations in City departments, i.e., fraud, waste, or abuse.
- b. Support the City's efforts to control integrity violations including prevention, detection, investigation, and follow through to identify trends and correct or strengthen internal controls.
- c. Support effective responses and encourage consistent remedies when integrity violations have occurred.

III. Conduct and values:

- a. Champion honesty and integrity in government.
- b. Focus more on factual conditions than the motives of those making allegations or providing information.
- c. Disclose committee members' external knowledge or involvement with investigation subjects or issues.
- d. Strive to protect those making allegations by safeguarding to the extent possible anonymity outside the committee and complying with "whistle blower" laws.
- e. Protect the civil rights of those against whom allegations are made.
- f. Protect the integrity of ongoing investigations by not discussing any of the issues surrounding the case with those involved or potentially involved until the case is resolved. This confidentiality should be accomplished while supporting appropriate action during investigations as described in Section IV.2c of these guidelines.
- g. If a committee member, designee, or required attendee violates these agreed upon "rules of conduct," appropriate sanctions will be imposed in accordance with reporting relationships defined in the City Charter, up to and including the individual's removal from the committee.

IV. Responsibilities (what we will do):

- 1) Responsibilities of management oversight:
 - a. Define and oversee working relationships between three investigative units (CAIU, APD, and HRD), the Corporate Internal Auditor's Office, and the City Integrity Officer, and develop citywide guidelines for case referrals.

- b. Ensure departments conducting internal investigations report cases and results in compliance with these guidelines and the Administrative Bulletin on Fraud, Waste, and Abuse Reporting, Investigation, and Prevention.
- c. Recommend policies and procedures related to preventive, detective, and corrective internal controls.
- d. Support the City’s Integrity Officer and HRD in writing or revising pertinent guidance, conducting training, designing controls, and taking other actions to strengthen the City’s ethical and control environment.

2) Responsibilities during the investigations:

- a. Reduce barriers; facilitate access to records.
- b. On cases presented to the committee, ensure that referrals are made to appropriate law enforcement authorities when potential criminal violations are suspected to have occurred. As part of the investigation process, prior communication on cases may occur between the City Auditor or his staff, law enforcement authorities, City internal auditing groups, the City’s Integrity Officer, and human resources personnel. Additional guidance on coordination and communication is provided in the Administrative Bulletin on Fraud, Waste, and Abuse Reporting, Investigation, and Prevention.
- c. As needed, advise the appropriate level of management to take immediate action to protect public safety, safeguard City assets, protect employees from retaliation, or address other significant or ongoing vulnerabilities.
- d. For high profile or especially sensitive cases (as designated by one or more of the three members of the Committee), the City Manager will be kept apprised of progress being made to complete the investigation.
- e. Without a committee meeting, and if resolution is not available or accomplished through the established investigative chain of command, two members are authorized to notify the City Manager and ask for support in:
 - o obtaining records when individuals are reluctant or refuse to provide access, and
 - o taking action to prevent acts of retaliation or “threats” to investigators and other individuals involved in the investigation.

3) Responsibilities after the investigations:

- a. For ongoing or underlying internal control deficiencies identified in more than one case, refer the condition to the City Manager’s or other appropriate office for consideration and potential action.
- b. For each case, support reporting investigative results to appropriate decision makers in the “chain of command.”
- c. For each case, encourage responsible decision makers to pursue appropriate administrative remedies and remedies at law.
- d. Investigative and audit units will implement follow through and follow up processes to help ensure internal controls are strengthened subsequent to investigations. This will help prevent reoccurrence of the same or similar integrity violations in the same department.

Note: Deciding on appropriate remedies rest with responsible decision makers when results of completed investigations are presented to the committee. Responsible decision makers are those managers or decision makers who have authority to determine and impose administrative remedies and pursue remedies at law.

V. Process (How we will do it):

- a. The Chair of this committee will rotate annually according to the following schedule:
FY 2007 – City Auditor
FY 2008 – City Attorney
FY 2009 – Designated Assistant City Manager
- b. The Chair is responsible for setting an agenda, scheduling and managing meetings, and ensuring the purpose of the committee is achieved.
- c. Committee hears summary results of CAIU’s, APD’s, and HRD’s completed investigations and status reports on investigations still underway. Reports will be summarized and limited to information necessary to fulfill the purpose and responsibilities of this committee. This is primarily information necessary to support administrative actions or remedies.
- d. Priority will be given to those investigations that could:
 - o represent ongoing or underlying internal control deficiencies in City operations,
 - o relate to cases, investigations, or issues being pursued sequentially or concurrently by CAIU, APD, and HRD,
 - o involve high profile or particularly sensitive issues, or
 - o require immediate management actions as defined in Section IV.2c of these guidelines.
- e. Committee decisions/recommendations/referrals will be made by majority vote unless otherwise provided for in these guidelines.
- f. Committee decisions/recommendations/referrals will be documented in writing.
- g. The City Attorney’s Office will provide administrative support to the committee by:
 - o distributing the agenda including topics, date, and time provided by the committee Chair,
 - o recording case presentations,
 - o maintaining records and minutes, and
 - o arranging for the meeting room.
- h. The City Auditor’s Office, APD, and HRD will support the committee by:
 - o presenting status reports on selected ongoing cases, and
 - o presenting results of completed investigations.
- i. The City Auditor’s Office, the City’s Integrity Officer, the Corporate Internal Auditor’s Office, and HRD will support the committee by suggesting potential remedies and referrals when investigations are completed as needed.
- j. The Human Resources Department will maintain a City wide database on cases involving integrity violations from inception until case disposition and implementation of remedies.
- k. The Human Resources Department, assisted by the Corporate Internal Auditor’s Office, will present a summary report and trend information, at each MIC meeting when appropriate, regarding types of cases and potential underlying control deficiencies.
- l. Conduct one meeting every two months, depending on demand.

VI. Reporting beyond the MIC meetings:

- a. The Designated Assistant City Manager will provide summary reports periodically to the City Manager’s CMO Team as a standing item on the CMO agenda.
- b. The Committee Chair or either of the other two members are authorized to call for and hold a “specially called” meeting if warranted by trends, case sensitivity, or

knowledge that cognizant decision makers are not taking appropriate action either during or after investigations occur. In that meeting, a decision may be made regarding further reporting or other actions.

APPENDIX I

Detailed Cities' Survey Responses

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APPENDIX I
Detailed Cities' Survey Responses

QUESTION	AUSTIN	Arlington	City of Dallas	El Paso	Fort Worth
What type of governance structure do you have?	Council/manager (weak mayor)	Council/manager (weak mayor)	Council/manager (weak mayor)	Council/manager (weak mayor)	Council/manager (weak mayor)
Other (please specify)					
Do you have a single person/group responsible for oversight of the entire ethics structure for your city?	I don't know	No	Yes	Yes	Yes
If yes, what is that person's job title or group's name?	What do you mean by "ethics structure"?		City of Dallas Ethics Advisory Commission	Ethics Review Commission	It originated as a Strike Team for the fraud hot line, but became known as the Fraud Committee. It developed the Fraud Policy and Procedure that is still being worked on, "A Class Act" program, and the Tips Hot Line. The hot line is referred to as the Fraud Hot Line, but it includes all issues. We have a regular Ethics course offered by HR, Employee Orientation includes ethic discussion and training. This "Fraud" Committee is involved in the upgrades to all of these components.
Do you have an ethics officer or an equivalent?	Yes	No	Yes	No	No
Does this person work on ethics issues:	Full time		Full time		
Other (please specify)		n/a	I coordinate the activities of the commission. What they do or when they do it is their decision. In the event of a complaint I handle communications and notifications, public postings, meeting arrangements etc.		n/a
What is this position called?	Integrity Officer	n/a	Coordinator III	N/A	n/a
To whom does this person report?	City Manager	n/a	Boards and Commissions Manager - Daniel Soliz (we work for the City Secretary - Deborah Watkins)	N/A	n/a
What activities is this group involved in? Please, select all that apply:					
Policy creation	Policy creation		Policy creation		
Policy implementation	Policy implementation				
Policy interpretation	Policy interpretation		Policy interpretation		
Prevention activities	Prevention activities				
Proactive detection					

QUESTION	AUSTIN	Arlington	City of Dallas	El Paso	Fort Worth
Reactive detection	Reactive detection				
Investigation					
Enforcement					
Advisory	Advisory		Advisory		
None of the above/ Other		None of the above/ Other		None of the above/ Other	None of the above/ Other
Other (please specify)		n/a			n/a
What sort of authority does this person have? Please, select all that apply					
Investigative authority					
Legislative authority					
Enforcement authority					
Disciplinary authority					
Subpoena					
None of the above/ other	None of the above/ other	None of the above/ other	None of the above/ other	None of the above/ other	None of the above/ other
Other (please specify)	Advisory	n/a			n/a
How many employees does this person have reporting to him/her? Please, select the one that fits the best	Only one person	None	None	None	None
Other (please specify)		n/a			n/a
How does this person/office become aware of ethics issues that require his/her attention or action?	Inquiries, Hotline, Reports, Emails, and News papers	n/a	A complaint must be filed with the City Secretary's Office.	N/A	n/a
Is that person responsible for managing other function?	No	No	Yes	No	No
if yes (please specify)		n/a	Financial Disclosure Reports of all Boards and Commission Members that are required to file. And other miscellaneous office duties.		n/a
Do you have a committee, commission or other body that addresses ethics issues related to elected officials?	Yes	Yes	Yes	Yes	Yes

QUESTION	AUSTIN	Arlington	City of Dallas	El Paso	Fort Worth
If yes, what is it called	Ethics Review Commission	Ethics Review Commission	the same...Ethics Advisory Commission	Ethics Review Commission	The Fraud Committee. City Manager has a program called A Class Act with values that include honest and ethical behavior. The committee that works on this program includes ACMs, Department Heads, Police, and Auditors.
Is this body established/ required by (please, select all that apply):	City ordinance	City ordinance	City charter	City charter	
Other (please specify)				Also we have an ordinance in Chapter 5.92 of the City Code	It is a City Manager's Office program supported with training, posters, Internet site, etc. The fraud hot line is part of this program. The hot line is under the City Manager with all criminal activity going to the Police and the other issues are sent to the departments assigned personnel. The department can involve audit. In some circumstances, the call information will come to audit.
What activities is this group involved in? Please, select all that apply:					
None of the above/ Other					
Policy creation	Policy creation		Policy creation		Policy creation
Policy implementation	Policy implementation		Policy implementation		Policy implementation
Policy interpretation	Policy interpretation	Policy interpretation	Policy interpretation		Policy interpretation
Prevention activities	Prevention activities	Prevention activities			Prevention activities
Proactive detection					Proactive detection
Reactive detection	Reactive detection	Reactive detection		Reactive detection	Reactive detection
Investigation	Investigation			Investigation	Investigation
Enforcement	Enforcement	Enforcement		Enforcement	Enforcement
Advisory	Advisory		Advisory	Advisory	Advisory
Other (please specify)					
What sort of authority does this group have? Please, select all that apply:					
Investigative authority	Investigative authority			Investigative authority	Investigative authority
Legislative authority					
Enforcement authority	Enforcement authority	Enforcement authority			Enforcement authority
Disciplinary authority					
Subpoena		Subpoena			Subpoena
None of the above/ Other			None of the above/ Other	None of the above/ Other	None of the above/ Other

QUESTION	AUSTIN	Arlington	City of Dallas	El Paso	Fort Worth
Other (please specify)				Section 2.2 G of the Charter (amended in 2007) provides that the Commission have the authority to request witness testimony and production of evidence. They can also issue advisory opinions.	Depends on the type of problem. It is delegated throughout the City.
How often does this group meet?	Quarterly	As needed when issues arise	As needed when issues arise	As needed when issues arise	Other
Other (please specify)					Reports are presented to the Audit and Finance Advisory Committee regularly, but not every weekly meeting
How does this group become aware of the issues that require their attention?	1. Sworn complaint 2. Staff may bring issues to the commission 3. council direction	The Ethics Review Commission only has authority to hear complaints against city officials relative to a violation of one of eleven specifically enumerated "standards of conduct" set forth in the City's Ethics Code. The standards of conduct only apply to city council members and council appointed boards. A citizen files a complaint against a city official alleging a violation of one of the specific standards of conduct with the City Secretary. The complaint is forwarded to the Ethics Review Commission and the City Attorney.	A complaint must be filed with the City Secretary, or the Mayor or Council may require action be taken on a matter.	By the filing of a complaint through the City Attorney's Office (as specified by Section 2.92.080 of the City Code.	Most of this goes through the hot line, but we have audit reports, Department Head presentations for problem areas that need to be addressed. The Committee is really how it is all established and placed into service. They are responsible for the Policy and Procedure development and the assignment of responsibility to provide enforcement to the proper level of authority. The Committee does not perform the processes they have created.
Do you have a city auditor?	Yes	Yes	Yes	Yes	Yes
How many employees report to the city auditor?	Sixteen to twenty five	Two to five people	More than twenty five	Two to five people	Sixteen to twenty five
To whom does the city auditor report?					
City Council	City Council	City Council			
City manager			City manager	City manager	
Audit committee					Audit committee

QUESTION	AUSTIN	Arlington	City of Dallas	El Paso	Fort Worth
None of the above/ Other					
Other (please specify)				The City Internal Auditor also prepares an audit plan each year, which is approved by a Legislative Review Committee composed of 4 members of the City Council.	
What activities related to ethics is the city auditor involved in? Please, select all that apply					
None of the above/ Other		None of the above/ Other		None of the above/ Other	
Policy creation	Policy creation		Policy creation		Policy creation
Policy implementation	Policy implementation		Policy implementation		Policy implementation
Policy interpretation	Policy interpretation		Policy interpretation		Policy interpretation
Prevention activities	Prevention activities		Prevention activities		Prevention activities
Proactive detection	Proactive detection		Proactive detection		Proactive detection
Reactive detection	Reactive detection		Reactive detection		Reactive detection
Investigation	Investigation		Investigation		Investigation
Enforcement			Enforcement		
Advisory	Advisory				Advisory
Other (please specify)					
What sort of authority does this office have? Please, select all that apply					
Legislative authority					
Enforcement authority					
Disciplinary authority					
Investigative authority	Investigative authority	Investigative authority	Investigative authority	Investigative authority	Investigative authority
None of the above/ Other					
Other (please specify)					

QUESTION	AUSTIN	Arlington	City of Dallas	El Paso	Fort Worth
How do ethics issues come to the attention of the city auditor?	1. Anonymous hotline 2. direct contact with staff or public 3. scheduled proactive audit	n/a	You would have to ask them that.	The City auditor does not ordinarily focus on ethics issues. In the course of conducting internal audits, the auditor could come across ethics violations by city employees, which would be reported to the department manager and the city manager's office.	Through our audits and the program "A Class Act" (ACT=A Accountability, C Character, T Trust)and its hot line handled through the City Manager's office Internal Audit receives issues to investigate and possibly provide support to the Police Department. We have a position for a Fraud Investigator. That position is open and the Audit Manager, formerly the Fraud Investigator, is providing the work. Our audit programs are designed to identify fraud problems which usually tie to the ethics issues as procurement problems. Since an auditor speaks on ethics at orientation, we get questions and employees start out knowing we are interested as a department and as a City.
What activities related to ethics is HR involved in? Please, select all that apply:					
None of the above/ Other					
Policy creation	Policy creation	Policy creation			Policy creation
Policy implementation	Policy implementation	Policy implementation			Policy implementation
Policy interpretation	Policy interpretation	Policy interpretation			Policy interpretation
Prevention activities	Prevention activities	Prevention activities	Prevention activities		Prevention activities
Proactive detection	Proactive detection	Proactive detection			
Reactive detection	Reactive detection	Reactive detection			
Investigation	Investigation	Investigation		Investigation	
Enforcement	Enforcement	Enforcement		Enforcement	Enforcement
Advisory	Advisory	Advisory			Advisory
Other (please specify)				City employees may be disciplined for violations of the ethics ordinance. The City's HR department would handle this and be involved in the same manner that they help the various departments with investigations and the imposition of disciplinary action.	Training is a major role for them.

QUESTION	AUSTIN	Arlington	City of Dallas	El Paso	Fort Worth
How do ethics issues come to the attention of Human Resources?	inquiries, grievances	Ethics issues come to the attention of HR from either a supervisor, an employee or by an investigation.	They have not yet.	Through a department director who becomes aware of an issue for which an employee may be disciplined.	Through the "A Class Act" program and the fraud hot line. Department Head and Managers take problems to them and use of the EAP.
Do you have formal policies and procedures in place that set forth ethics expectations for your employees?	Yes	Yes	Yes	Yes	Yes
If yes, how can we get a copy?	Hard copies can be provided.	yes	I can send you one or you may go to our website and look at Section 12A-24 http://www.ci.dallas.tx.us/ethics/index.shtml http://www.amlegal.com/nxt/gateway.dll/Texas/dallas/volumei/chapter12acodeofethics?f=templates\$fn=altmain-nf.htm\$3.0#JD_12A-24	The City's Ethics Ordinance, Chapter 2.92, is available on the City's website, www.elpasotexas.gov . Access through "online services" to the "municipal code." The City Charter is available through the municipal code and Section 6.13-3 states the causes of suspension, reduction or discharge. The City's Civil Service Commission Rules are accessible on the website through the "City Jobs" link. Rules 15 and 16 deal with disciplinary action and appeals. I will also note that in the Charter, Section 2.1D provides that an elected official is subject to removal from office for a violation of the Ethics Ordinance.	Public information request would be needed for some of the material. The Fraud Policy is still in draft status. Many are on the Internet Site. Orientation and the Ethic class material contain the material, too.
Who does your city's ethics initiatives focus on? Select all that apply					
Elected officials			Elected officials	Elected officials	Elected officials
Employees	Employees	Employees	Employees	Employees	Employees
Department heads	Department heads	Department heads	Department heads	Department heads	Department heads
None of the above/ Other				None of the above/ Other	

QUESTION	AUSTIN	Arlington	City of Dallas	El Paso	Fort Worth
Other (please specify)				volunteers and all board, commission and committee members	
Does your city regulate ethics issues related to:					
Open Government	Open Government		Open Government		Open Government
Political activities of employees	Political activities of employees	Political activities of employees	Political activities of employees	Political activities of employees	Political activities of employees
Procurement practices	Procurement practices	Procurement practices	Procurement practices		Procurement practices
Lobbying of elected officials	Lobbying of elected officials	Lobbying of elected officials		Lobbying of elected officials	Lobbying of elected officials
Campaign finance	Campaign finance		Campaign finance	Campaign finance	
Conflict of interest	Conflict of interest	Conflict of interest	Conflict of interest	Conflict of interest	Conflict of interest
Gifts	Gifts	Gifts	Gifts	Gifts	Gifts
Use of city equipment	Use of city equipment	Use of city equipment	Use of city equipment	Use of city equipment	Use of city equipment
Use of city funds	Use of city funds	Use of city funds	Use of city funds	Use of city funds	Use of city funds
None of the above/ Other					
Comments				The City has nothing for procurement practices and open government beyond what is provided for in state law.	
Which of the following are required by state law? Please, select all that apply					
Ethics training					
Ethics Officer position					
Ethics Commission or similar body					
None of the above/ Other					
None of the above/ Other	None of the above/ Other	None of the above/ Other	None of the above/ Other	None of the above/ Other	None of the above/ Other
Other (please specify)					We are not aware of any state law requirement
What ethics publications other than formal policies do you have (e.g. website, brochures, training materials)?	Integrity office website, training materials, councilmember handbook	n/a	A VHS about the Code of Ethics by the City Attorneys Office must be viewed by all Board and Commission Members prior to assuming duties of their appointed position.	Nothing extensive. The City Attorney's Office web page contains basic information on the ethics ordinance and a link to download or print the complaint form.	On the city web-site and in Employee Orientation, the program "A Class Act" is discussed. It is formal with brochures, posters, cards, and the Ethics class in our regular HR courses includes the training on the program.

QUESTION	AUSTIN	Arlington	City of Dallas	El Paso	Fort Worth
Does your organization provide ethics training to city employees?	Yes	No	Yes	Yes	Yes
If yes, please specify			All new employees must attend orientation which addresses Ethics Policies and they receive a copy of Chapter 12A.	Training is provided to new employees as part of their orientation.	On the employee's Orientation day, they receive information on the "A Class Act" program and the fraud hot line, an auditor speaks on ethics, and ethics are discussed. We also have an HR course on ethics. Administrative Regulations include ethics by subject as Purchasing, Gifts, Vehicle Usage, etc.
Does your organization provide ethics training to elected officials?	No	Yes	Yes	Yes	Yes
If yes, please specify		New Council members are provided an orientation that includes an introduction to the City's ethics code and relevant state law statutes.	They must also view the Ethics Video and they receive a copy of Chapter 12A.	Every two years, the City has training for its newly elected officials, which includes training on the ethics ordinance. Current elected officials are permitted to attend this training, if they wish.	We have presentations by HR and have had external consultants present issues. With the committee on the "A Class Act" program and fraud hot line, there have been numerous meetings that they have received reports.
Does your city have any other functions that deal with ethical issues that we have not discussed above?	No	No	No	No	No
If yes, please describe					

QUESTION	Houston	San Antonio	Atlanta	Jacksonville Florida	Kansas	Memphis
What type of governance structure do you have?	Strong mayor				Council/manager (weak mayor)	Strong mayor
Other (please specify)		Mayor / Council		Strong Mayor/Strong Council/Independent Authorities; consolidated city/county government	I would not describe our governance structure as including a "weak mayor" component; but, the mayor is not the chief operating officer.	
Do you have a single person/group responsible for oversight of the entire ethics structure for your city?	No	Yes	Yes	No	No	Yes
If yes, what is that person's job title or group's name?		City Attorney + City Clerk(admin. support: complaints, meetings etc) work together	Board of Ethics			Ethics officer
Do you have an ethics officer or an equivalent?	No	Yes	Yes	Yes	No	Yes
Does this person work on ethics issues:		Full time	Full time	Part time		Part time
Other (please specify)	We have a volunteer City Ethics Committee whose members included nominees from the City of Houston, The Houston Bar Association, and a representative from the Texas Medical Center. The City Attorney's office advises this group which hears complaints that are not forwarded to the State Ethics Commission. Matters alleging a violation of state law are also investigated by the Inspector General of the Houston Police Department and the County District Attorney				[Not applicable]	
What is this position called?	City Ethics Committee	Ethics Compliance Officer (Assistant City Attorney) (2)	ethics officer	Ethics Officer	[Not applicable]	Ethics Officer
To whom does this person report?	The City Attorney and the Mayor	City Attorney	board of ethics	Mayor and President of City Council	[Not applicable]	City Council

QUESTION	Houston	San Antonio	Atlanta	Jacksonville Florida	Kansas	Memphis
What activities is this group involved in? Please, select all that apply:						
Policy creation		Policy creation	Policy creation	Policy creation		Policy creation
Policy implementation		Policy implementation	Policy implementation	Policy implementation		
Policy interpretation	Policy interpretation		Policy interpretation			Policy interpretation
Prevention activities		Prevention activities	Prevention activities	Prevention activities		
Proactive detection				Proactive detection		
Reactive detection	Reactive detection	Reactive detection		Reactive detection		Reactive detection
Investigation	Investigation		Investigation	Investigation		
Enforcement			Enforcement			Enforcement
Advisory		Advisory	Advisory	Advisory		
None of the above/ Other					None of the above/ Other	
Other (please specify)		Complaint driven process; The board may direct to investigate; Ethics code covers campaign finance - CA+CC has a role; role in lobbying; issue opinion of	I don't know what proactive and reactive detection is.		[Not applicable]	
What sort of authority does this person have? Please, select all that apply						
Investigative authority		Investigative authority	Investigative authority	Investigative authority		Investigative authority
Legislative authority				Legislative authority		
Enforcement authority			Enforcement authority			Enforcement authority
Disciplinary authority						
Subpoena		Subpoena				
None of the above/ other	None of the above/ other				None of the above/ other	
Other (please specify)					[Not applicable]	
How many employees does this person have reporting to him/her? Please, select the one that fits the best	None	Only one person	Two-five	None	None	Only one person
Other (please specify)		Admin.			[Not applicable]	

QUESTION	Houston	San Antonio	Atlanta	Jacksonville Florida	Kansas	Memphis
How does this person/office become aware of ethics issues that require his/her attention or action?	The Ethics Committee investigates complaints sent directly to the Committee or throughout the City Attorney's Office.	Citizens file complaints. Formal and notarized.	complaints filed with ethics office ethics and compliance hotline news articles law department reports	Hotline; direct calls from citizens and employees	[Not applicable]	Complaints filed
Is that person responsible for managing other function?	Yes	No	No	No	No	Yes
if yes (please specify)	The City Attorney's office advises the Committee as well as performing all other legal functions on behalf of the City	2 officers are responsible for open gov, Ch 1.45 - personal fin statements.			[Not applicable]	HR
Do you have a committee, commission or other body that addresses ethics issues related to elected officials?	Yes	Yes	Yes	Yes	Yes	Yes
If yes, what is it called	Please see answers above. This is the City Ethic Committee	Ethics Review Board (10 district reps + mayor appointee)			There are two. The Municipal Officials and Officers Ethics Commission has jurisdiction over elected and appointed officials, the city manager, assistant city managers and department heads. The Committee on Administrative Ethics has jurisdiction over all other employees.	City Council Personnel Committee
Is this body established/ required by (please, select all that apply):	City ordinance		City ordinance	City ordinance	City charter	City ordinance
Other (please specify)					The Municipal Officials and Officers Ethics Commission is created by Charter. The Committee of Administrative Service Ethics is created by Administrative Regulation.	
What activities is this group involved in? Please, select all that apply:						
None of the above/ Other						
Policy creation		Policy creation	Policy creation	Policy creation		Policy creation
Policy implementation			Policy implementation			Policy implementation

QUESTION	Houston	San Antonio	Atlanta	Jacksonville	Kansas	Memphis
Policy interpretation	Policy interpretation	Policy interpretation	Policy interpretation		Policy interpretation	
Prevention activities				Prevention activities		
Proactive detection				Proactive detection		
Reactive detection	Reactive detection				Reactive detection	Reactive detection
Investigation	Investigation	Investigation			Investigation	Investigation
Enforcement		Enforcement	Enforcement		Enforcement	
Advisory			Advisory	Advisory	Advisory	
Other (please specify)		Board can file a complaint if they see a problem.				
What sort of authority does this group have? Please, select all that apply:						
Investigative authority		Investigative authority	Investigative authority	Investigative authority	Investigative authority	Investigative authority
Legislative authority		Legislative authority				Legislative authority
Enforcement authority		Enforcement authority	Enforcement authority		Enforcement authority	
Disciplinary authority						
Subpoena			Subpoena		Subpoena	Subpoena
None of the above/ Other	None of the above/ Other					
Other (please specify)						
How often does this group meet?	As needed when issues arise	As needed when issues arise	Monthly or more often	Monthly or more often	As needed when issues arise	Monthly or more often
Other (please specify)						
How does this group become aware of the issues that require their attention?	when complaints are filed with the Committee or with the City Attorney	Complaints	ethics officer	Newspaper; hotline, citizen complaints; review of best practices in the U.S.	By requests for advisory opinions or complaints.	via complaints
Do you have a city auditor?	Yes	Yes	Yes	Yes	Yes	Yes
How many employees report to the city auditor?	More than twenty five	Sixteen to twenty five	Six to fifteen people	Six to fifteen people	Six to fifteen people	More than twenty five
To whom does the city auditor report?						
City Council	City Council	City Council		City Council	City Council	
City manager						
Audit committee			Audit committee			
None of the above/ Other						None of the above/ Other
Other (please specify)	The City Controller functions as the City Auditor					Mayor

QUESTION What activities related to ethics is the city auditor involved in? Please, select all that apply	Houston	San Antonio	Atlanta	Jacksonville Florida	Kansas	Memphis
None of the above/ Other		None of the above/ Other		None of the above/ Other	None of the above/ Other	None of the above/ Other
Policy creation			Policy creation			
Policy implementation			Policy implementation			
Policy interpretation			Policy interpretation			
Prevention activities						
Proactive detection			Proactive detection			
Reactive detection						
Investigation			Investigation			
Enforcement						
Advisory	Advisory		Advisory			
Other (please specify)				don't know specifically, as I am not in that office; we have just created a new Inspector General position for the city		
What sort of authority does this office have? Please, select all that apply			No response			
Legislative authority						
Enforcement authority						
Disciplinary authority						
Investigative authority	Investigative authority			Investigative authority	Investigative authority	
None of the above/ Other		None of the above/ Other				None of the above/ Other
Other (please specify)			call the auditor			
How do ethics issues come to the attention of the city auditor?	via complaint or as the result of an audit	not involved	ethics and compliance hotline audit investigations	various; as listed above for the Ethics Office	Council requests for audits and facts or issues discovered during the audit	none
What activities related to ethics is HR involved in? Please, select all that apply:						
None of the above/ Other		None of the above/ Other	None of the above/ Other			
Policy creation	Policy creation					
Policy implementation						Policy implementation
Policy interpretation						Policy interpretation
Prevention activities						Prevention activities

QUESTION	Houston	San Antonio	Atlanta	Jacksonville Florida	Kansas	Memphis
Proactive detection						Proactive detection
Reactive detection				Reactive detection	Reactive detection	Reactive detection
Investigation					Investigation	Investigation
Enforcement						
Advisory	Advisory					Advisory
Other (please specify)			I'm losing patience. This survey is too long			
How do ethics issues come to the attention of Human Resources?	don't know	Everything goes through Council	I don't know	The press; from the city Ethics Office	Complaints or investigations of personnel matters.	via complaint
Do you have formal policies and procedures in place that set forth ethics expectations for your employees?	Yes	Yes	Yes	Yes	Yes	Yes
If yes, how can we get a copy?	send a request to my office	Will be e-mailed	We do not have a formal Code of Conduct. We do have advisory opinions and other publications at the city's website. Here is link to ethical standards for employees. http://www.atlantaga.gov/government/boards/boards/boards/standards_employees.aspx	our ethics code; on line at www.coj.net see ethics department	If provided with a mailing address, I can send copies.	yes
Who does your city's ethics initiatives focus on? Select all that apply						
Elected officials	Elected officials	Elected officials	Elected officials	Elected officials	Elected officials	Elected officials
Employees	Employees	Employees	Employees	Employees	Employees	
Department heads	Department heads	Department heads	Department heads	Department heads	Department heads	Department heads
None of the above/ Other						
Other (please specify)		+Vendors, lobbyists	board members; neighborhood planning unit officers		Appointed officials	
Does your city regulate ethics issues related to:						
Open Government	Open Government	Open Government		Open Government	Open Government	Open Government

QUESTION	Houston	San Antonio Political activities of employees	Atlanta	Jacksonville Florida	Kansas	Memphis
Political activities of employees	Political activities of employees	Political activities of employees		Political activities of employees	Political activities of employees	Political activities of employees
Procurement practices	Procurement practices		Procurement practices	Procurement practices	Procurement practices	Procurement practices
Lobbying of elected officials	Lobbying of elected officials	Lobbying of elected officials		Lobbying of elected officials	Lobbying of elected officials	Lobbying of elected officials
Campaign finance	Campaign finance	Campaign finance			Campaign finance	
Conflict of interest	Conflict of interest	Conflict of interest	Conflict of interest	Conflict of interest	Conflict of interest	Conflict of interest
Gifts	Gifts	Gifts	Gifts	Gifts	Gifts	Gifts
Use of city equipment	Use of city equipment		Use of city equipment	Use of city equipment	Use of city equipment	Use of city equipment
Use of city funds		Use of city funds	Use of city funds	Use of city funds	Use of city funds	Use of city funds
None of the above/ Other						
Comments		Pol. emp - HR as well		campaign finance laws being looked at now		
Which of the following are required by state law? Please, select all that apply						
Ethics training						
Ethics Officer position						
Ethics Commission or similar body						Ethics Commission or similar body
None of the above/ Other						
None of the above/ Other	None of the above/ Other	None of the above/ Other	None of the above/ Other	None of the above/ Other	None of the above/ Other	
Other (please specify)	not sure	Asked for permission to do their own.				
What ethics publications other than formal policies do you have (e.g. website, brochures, training materials)?	training materials, emails, training classes	Web-site, video	website newsletter brochures training materials Go to: http://www.atlantaga.gov/government/boards/ethicspublications.aspx?section=Code%20of%20Ethics	Web site; some brochures; lots of training materials	An Ethics Handbook.	policy statements
Does your organization provide ethics training to city employees?	Yes	Yes	Yes	Yes	Yes	Yes

QUESTION	Houston	San Antonio	Atlanta	Jacksonville Florida	Kansas	Memphis
If yes, please specify	Regular required annual training	City Attorney Office		new employee ethics training; we have one departmental ethics officer in each department of the city and we roll out continual training	Varies by nature of work to be done by employee. During orientation, each new employee receives limited instruction, along with the Ethics Handbook. Ethics training component is being created and will be included in the instruction offered through the relatively new Contract Training Academy.	
Does your organization provide ethics training to elected officials?	Yes	Yes	Yes	Yes	Yes	Yes
If yes, please specify	same			when they start; and yearly; very comprehensive training	Ethics training is required before elected officials can be sworn into office and refresher ethics training is then required every 6 months.	
Does your city have any other functions that deal with ethical issues that we have not discussed above?	No	Yes	Yes		Yes	No
If yes, please describe		Municipal integrity: employees can call anonymous to Municipal Integrity (under HR). MI will file a complaint against.	financial disclosure	We have an Inspector General and Departmental ethics officers for each department of our city.	City Attorney provides ethics advice to all elected and appointed official and City employees upon request. City Attorney also serves as primary legal advisor to both the Municipal Officials and Officers Ethics Commission and the Committee on Administrative Service Ethics.	

QUESTION	Minneapolis	Oklahoma	Phoenix	San Diego	San Jose	Seattle
What type of governance structure do you have?	Council/manager (weak mayor)	Council/manager (weak mayor)	Council/manager (weak mayor)	Strong mayor		Strong mayor
Other (please specify)					Basically Council/Manager, but Mayor has certain budgeting and other authority.	
Do you have a single person/group responsible for oversight of the entire ethics structure for your city?	Yes	No	No	No	No	Yes
If yes, what is that person's job title or group's name?	City Council	The Personnel Department and an Ethics Committee				Seattle Ethics and Elections Commission
Do you have an ethics officer or an equivalent?	Yes	Yes	No	Yes	No	Yes
Does this person work on ethics issues:	Part time	Part time		Full time		
Other (please specify)		We have an Ethics Committee comprised of an Assistant City Manager, Assistant Personnel Director and Finance Director. The City Auditor and an Assistant Municipal Counselor serve on the committee in an advisory capacity.				I administer the City's Ethics Code and its Elections Code. I spend most of my time on ethics issues.
What is this position called?	Ethics Officer	The Ethics Committee	n/a	Deputy Chief, Office of Ethics and Integrity	n/a	Executive Director, Seattle Ethics and Elections Commission
To whom does this person report?	City Attorney	City Manager	n/a	Mayor	n/a	Ethics and Elections Commission
What activities is this group involved in? Please, select all that apply:						
Policy creation	Policy creation	Policy creation		Policy creation		Policy creation
Policy implementation	Policy implementation			Policy implementation		Policy implementation
Policy interpretation	Policy interpretation	Policy interpretation		Policy interpretation		Policy interpretation
Prevention activities	Prevention activities	Prevention activities		Prevention activities		Prevention activities
Proactive detection						
Reactive detection	Reactive detection			Reactive detection		Reactive detection
Investigation	Investigation					Investigation
Enforcement						Enforcement

QUESTION	Minneapolis	Oklahoma	Phoenix	San Diego	San Jose	Seattle
Advisory	Advisory	Advisory		Advisory		Advisory
None of the above/ Other			None of the above/ Other	None of the above/ Other	None of the above/ Other	
Other (please specify)	I have defined the word "group" in this question to mean Ethics Officer. Although the City Council has the ultimate oversight authority, the Minneapolis Ethical Practices Board advises the City Council as to policy, provides interpretations of the ethics code, responds to allegations of Ethics Code violations involving department heads and appointed or elected officials, and provides policy advice to the Ethics Officer.			The Office of Ethics and Integrity administers ethics compliance training and training re ethical decision-making and problems solving. Specific training has been developed for managers and administrators to support them in fostering and promoting a high ethical culture in the workplace. It administers the Employee Hotline. A website was created and is currently maintained that provides information and resources to employees concerning ethics issues and events. Deployed, in 2006, the City's first ethics Culture Survey. The survey will be redeployed in 2008-09.	n/a	
What sort of authority does this person have? Please, select all that apply						
Investigative authority						Investigative authority
Legislative authority						
Enforcement authority						Enforcement authority
Disciplinary authority						
Subpoena						Subpoena
None of the above/ other	None of the above/ other	None of the above/ other	None of the above/ other	None of the above/ other	None of the above/ other	

QUESTION	Minneapolis	Oklahoma	Phoenix	San Diego	San Jose	Seattle
The Ethics Officer does some preliminary investigative work but generally, investigations are conducted by the department in which the allegation occurred or by Human Resources. The Ethical Practices Board does have the power to conduct investigations and to make recommendations of discipline for violations by elected and non-employee local officials.						
Other (please specify)					n/a	
How many employees does this person have reporting to him/her? Please, select the one that fits the best	None	None	None	Two-five	None	Five-ten
Other (please specify)					n/a	
How does this person/office become aware of ethics issues that require his/her attention or action?	telephone, email, and/or MyReportLine (a confidential reporting line)	Questions/issues are submitted to the Ethics Committee for review.	na	Through personal contacts via appointments, email, telephone or in writing, as well, as through the Employee Hotline.	n/a	Most of our investigations are complaint-driven, although we sometimes start an investigation in the wake of a newspaper story. Our educational and rulemaking efforts are driven by what we hear in trainings and conversations with others in City government. For example, the Commission adopted a Gift Rule in 2006 in response to widespread concerns voiced by employees and elected officials that they did not know when gifts could be accepted and when they could not.
Is that person responsible for managing other function?	No	Yes	No	Yes	No	Yes

QUESTION	Minneapolis	Oklahoma	Phoenix	San Diego	San Jose	Seattle
if yes (please specify)	Unsure of what this means.	All committee members manage other functions.	na	Several other departments are contained within the Office of Ethics and Integrity - the Human Relations Commission, Diversity Commitment, the Citizens Review Board on Police Practices and Disability Services Program.	n/a	We monitor the money raised and spent on campaigns for City office, and also produce voters' pamphlets for the primary and general elections held every two years. The City Council is currently considering a lobbyist registration ordinance, which our office would administer.
Do you have a committee, commission or other body that addresses ethics issues related to elected officials?	Yes	No	Yes	Yes	Yes	Yes
If yes, what is it called	Ethical Practices Board		Integrity Committee	City of San Diego Ethics Commission (this department is NOT associated with my department)	San Jose Elections Commission	Seattle Ethics and Elections Commission
Is this body established/ required by (please, select all that apply):	City ordinance			City ordinance	City ordinance	City ordinance
Other (please specify)			See #4.			
What activities is this group involved in? Please, select all that apply:		None of the above/ Other				
None of the above/ Other						
Policy creation	Policy creation			Policy creation	Policy creation	Policy creation
Policy implementation	Policy implementation			Policy implementation	Policy implementation	Policy implementation
Policy interpretation	Policy interpretation		Policy interpretation	Policy interpretation		Policy interpretation
Prevention activities	Prevention activities			Prevention activities		Prevention activities
Proactive detection				Proactive detection	Proactive detection	
Reactive detection			Reactive detection	Reactive detection	Reactive detection	
Investigation	Investigation		Investigation	Investigation	Investigation	
Enforcement	Enforcement		Enforcement	Enforcement	Enforcement	Enforcement
Advisory	Advisory		Advisory			Advisory
Other (please specify)						
What sort of authority does this group have? Please, select all that apply:						
Investigative	Investigative			Investigative	Investigative	Investigative authority

QUESTION	Minneapolis authority	Oklahoma	Phoenix	San Diego authority	San Jose authority	Seattle
Legislative authority						
Enforcement authority				Enforcement authority	Enforcement authority	Enforcement authority
Disciplinary authority						
Subpoena				Subpoena	Subpoena	Subpoena
None of the above/ Other		None of the above/ Other	None of the above/ Other			
Other (please specify)	to review and make findings concerning any alleged violation of the ethics code		The Integrity Committee was established administratively by the City Manager and has the responsibility/authority to investigate and resolve complaints received.			
How often does this group meet?	Monthly or more often		Monthly or more often	Other	Other	Monthly or more often
Other (please specify)				Because this is not within my department - this is unknown	Regular meetings are monthly but they also meet as need arises	
How does this group become aware of the issues that require their attention?	Brought to their attention by the Ethics Officer, or the news media		Through the hotline or from operating department management.	Unknown - should contact the Executive Director of the Ethics Commission - Stacey Fulhorst	complaints; referrals from City Council; on their own motion	The Executive Director can file charges with the Commission, or seek the Commission's approval of a settlement. Complainants can appeal the Executive Director's dismissals to the Commission. The Executive Director also presents the Commission with draft rules and draft advisory opinions.
Do you have a city auditor?	Yes	Yes	Yes	Yes	Yes	Yes
How many employees report to the city auditor?	None	Six to fifteen people	More than twenty five	More than twenty five	Sixteen to twenty five	Six to fifteen people
To whom does the city auditor report?						
City Council		City Council			City Council	City Council
City manager			City manager			
Audit committee			Audit committee			
None of the above/ Other	None of the above/ Other			None of the above/ Other		
Other (please specify)	Board of Estimate and Taxation			Chief Operations Officer		
What activities related to ethics is the city auditor involved in? Please, select all that apply						
None of the					None of the	

QUESTION above/ Other	Minneapolis	Oklahoma	Phoenix	San Diego	San Jose above/ Other	Seattle
Policy creation	Policy creation			Policy creation		
Policy implementation	Policy implementation			Policy implementation		
Policy interpretation		Policy interpretation		Policy interpretation		
Prevention activities	Prevention activities	Prevention activities	Prevention activities			
Proactive detection	Proactive detection	Proactive detection	Proactive detection	Proactive detection		Proactive detection
Reactive detection	Reactive detection	Reactive detection	Reactive detection	Reactive detection		
Investigation	Investigation	Investigation	Investigation	Investigation		
Enforcement						
Advisory	Advisory	Advisory	Advisory	Advisory		
Other (please specify)					The Auditor has no specific authority over ethical issues. When issues concerning employee ethics are uncovered during the course of an audit, they are referred to the Office of Employee Relations for investigation.	
What sort of authority does this office have? Please, select all that apply						
Legislative authority						
Enforcement authority		Enforcement authority				
Disciplinary authority						
Investigative authority	Investigative authority	Investigative authority	Investigative authority	Investigative authority	Investigative authority	Investigative authority
None of the above/ Other						
Other (please specify)						

QUESTION	Minneapolis	Oklahoma	Phoenix	San Diego	San Jose	Seattle
How do ethics issues come to the attention of the city auditor?	telephone, email, written anonymous note, U.S. mail, MyReportLine (a confidential reporting line)	Ethics issues generally are first submitted to the Ethics Committee. The City Auditor serves on the Ethics Committee in an advisory capacity. Ethics issues may also be submitted directly to the City Auditor for evaluation. A Hotline is available for persons to anonymously submit ethics issues, suspected cases of fraud, waste or abuse to the City Auditor for evaluation.	Through the hotline, routine audits, or from operating department management.	Unknown	Only in the course of regular program audits.	Generally speaking, our office investigates the unethical behavior of specific City employees, and the auditor investigates system-wide issues with the management of City programs. When one of us gets a complaint that we believe is more appropriately addressed by the other, we bring that complaint to the other's attention.
What activities related to ethics is HR involved in? Please, select all that apply:						
None of the above/ Other						None of the above/ Other
Policy creation	Policy creation	Policy creation	Policy creation	Policy creation	Policy creation	
Policy implementation	Policy implementation	Policy implementation	Policy implementation		Policy implementation	
Policy interpretation	Policy interpretation	Policy interpretation	Policy interpretation		Policy interpretation	
Prevention activities	Prevention activities				Prevention activities	
Proactive detection	Proactive detection				Proactive detection	
Reactive detection	Reactive detection	Reactive detection			Reactive detection	
Investigation	Investigation	Investigation		Investigation	Investigation	
Enforcement		Enforcement			Enforcement	
Advisory	Advisory	Advisory	Advisory	Advisory	Advisory	
Other (please specify)	HR investigates all Respect in the Workplace (sexual harassment & discrimination claims) involving employees. HR advises Departments regarding work place situations.				Also monitors the Employee Fraud Hotline. An anonymous whistleblower program. Note that the authority of Employee Relations extends only to employees. No authority over Council offices or Council Appointee Offices (City Attorney, City Clerk, City Auditor)	The City's HR function is not centralized, but is handled department by department. Many issues are brought to us by HR staff in the various departments. Only the Ethics and Elections Commission can find an employee in violation of the Ethics Code, but to the extent an employee's conduct also violates other workplace rules and regulations, the employee can be disciplined by the department. The Commission takes that discipline into account when deciding whether to penalize an employee for violating the Code.

QUESTION	Minneapolis	Oklahoma	Phoenix	San Diego	San Jose	Seattle
How do ethics issues come to the attention of Human Resources?	complaints, department notification	Submitted through various means.... supervisors, employees, vendors, etc.	Same as City Auditor Department.	Information received from managers and other employees and from reports from the Employee Hotline.	complaints;	Many employees take ethics questions and complaints to their HR Department.
Do you have formal policies and procedures in place that set forth ethics expectations for your employees?	Yes	Yes	Yes	Yes	Yes	Yes
If yes, how can we get a copy?	request a copy of the ethics code from the Ethics Officer	Request a copy from Monica Coleman, Assistant Personnel Director. monica.coleman@okc.gov	Yes, we will send you a copy of the City of Phoenix Ethics Handbook.	Can be sent electronically.	Please see the City's Website at Sanjoseca.gov	The City's Ethics Code is encoded at SMC Chapter 4.16, which you can access at http://clerk.ci.seattle.wa.us/~public/toc/4-16.htm
Who does your city's ethics initiatives focus on? Select all that apply						
Elected officials	Elected officials		Elected officials	Elected officials	Elected officials	Elected officials
Employees	Employees	Employees	Employees	Employees	Employees	Employees
Department heads	Department heads	Department heads		Department heads	Department heads	Department heads
None of the above/ Other						
Other (please specify)						
Does your city regulate ethics issues related to:						
Open Government		Open Government	Open Government	Open Government	Open Government	
Political activities of employees	Political activities of employees	Political activities of employees	Political activities of employees	Political activities of employees		Political activities of employees
Procurement practices	Procurement practices	Procurement practices	Procurement practices	Procurement practices	Procurement practices	Procurement practices
Lobbying of elected officials	Lobbying of elected officials		Lobbying of elected officials	Lobbying of elected officials	Lobbying of elected officials	
Campaign finance			Campaign finance	Campaign finance	Campaign finance	Campaign finance
Conflict of interest	Conflict of interest	Conflict of interest	Conflict of interest	Conflict of interest	Conflict of interest	Conflict of interest
Gifts	Gifts	Gifts	Gifts	Gifts	Gifts	Gifts
Use of city equipment	Use of city equipment	Use of city equipment	Use of city equipment	Use of city equipment	Use of city equipment	Use of city equipment
Use of city funds	Use of city funds	Use of city funds	Use of city funds	Use of city funds	Use of city funds	Use of city funds
None of the above/ Other						None of the above/ Other
Comments						The misuse of confidential information would also violate the Ethics Code.

QUESTION	Minneapolis	Oklahoma	Phoenix	San Diego	San Jose	Seattle
Which of the following are required by state law? Please, select all that apply						
Ethics training				Ethics training	Ethics training	
Ethics Officer position						
Ethics Commission or similar body						
None of the above/ Other						
None of the above/ Other	None of the above/ Other	None of the above/ Other	None of the above/ Other			None of the above/ Other
Other (please specify)		Ethics training is now required by state law for all newly elected municipal officials and appointees				
What ethics publications other than formal policies do you have (eg. web-site, brochures, and training materials)?	web-site, training materials	Comprehensive Code of conduct, Ethics and Fraud Intolerance Policy brochure Hotline Brochure Ethics poster	Training materials thru HR.	a) website, b) Employee Code of Conduct Handbook, c) new employee brochure, d) Ethical Decision Making pocket card, e) administrative regulations, f) City Council policies, g) personnel manual,	Training materials; webpage in development	All of the Commission's publications, including brochures, are available at www.seattle.gov/ethics
Does your organization provide ethics training to city employees?	Yes	No	Yes	Yes	Yes	Yes
If yes, please specify	Training is provided by the Ethics Officer and is required once every 4 years.		All employees receive ethics training as part of employee orientation and periodically as part of training called "Back to Basics."	Mandatory on-line ethics compliance training (all employees), mandatory Ethical decision making and problem solving instructor led training (all employees), mandatory Fostering and Promoting Open and Honest Communications (unclassified managers, mandatory), Ethical Leadership Roundtable(top 15-20 City leaders - including the Mayor)	the City Attorney's Office provides training to departments upon request.	Ethics is a component of every new employee and new supervisor training. In addition, we speak to smaller groups all the time, and conduct classes.

QUESTION	Minneapolis	Oklahoma	Phoenix	San Diego	San Jose	Seattle
Does your organization provide ethics training to elected officials?	Yes	Yes	Yes	No	Yes	Yes
If yes, please specify	This training is provided by the Ethics Officer	Only newly elected officials	Yes- thru boards and commissions orientation/training.		The City attorney's Office provides a two hour Ethics training to Elected officials and their staffs, selected Boards and Commissions as required by state law. We also periodically make presentations at Council meetings on selected ethical issues at the request of the Mayor.	Newly elected officials and their staffs are always trained by the Executive Director. When elections roll around every other year, we conduct a training on political activity for all City Council offices.
Does your city have any other functions that deal with ethical issues that we have not discussed above?	No	Yes	No	No	No	No
If yes, please describe		Both the Police and Fire departments have internal functions that deal with ethics issues.				