



ANNUAL REPORT 2019



Office of Inspector General
City of Jacksonville

(October 1, 2018 — September 30, 2019)





MESSAGE FROM THE INSPECTOR GENERAL

TO THE CITIZENS OF JACKSONVILLE AND THE ELECTED OFFICIALS, OFFICERS, AND EMPLOYEES OF THE CONSOLIDATED GOVERNMENT:

On behalf of the Office of Inspector General (OIG), it is my honor to present the Fiscal Year 2019 Annual Report highlighting the OIG's operations and activities from October 1, 2018 through September 30, 2019.

During Fiscal Year 2019, the OIG enjoyed several firsts since its inception, including continuity within management positions, which resulted in continuity of operations and the refinement of numerous processes. Additionally, the OIG focused its efforts on outreach opportunities and training regarding the mission of the OIG and potential indicators of fraud, waste, and abuse.

Also, as prescribed in the Ordinance Code, I achieved certification as a Certified Inspector General (CIG) through the Association of Inspectors General, the organization that provides standards for the operations and work performed by OIGs.

It remains our desire and commitment to continue to provide independent and responsible oversight to the Consolidated Government and the citizens of Duval County during Fiscal Year 2020, as the OIG works towards becoming an accredited agency through the Commission for Florida Law Enforcement Accreditation, Inc.'s Inspectors General Accreditation program.

In closing, the OIG sincerely appreciates all those who support responsible and independent oversight. I personally want to thank the Office of City Council, the Office of the Mayor, all City officials and employees of the Consolidated Government, and the citizens of Duval County for their commitment to the mission of the OIG. We look forward to our continued service and dedication to the City of Jacksonville during Fiscal Year 2020.

Sincerely,



*Lisa A. Green
Inspector General*



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HIGHLIGHTS FY 2019:

11

Reports/Inquiries Issued

- ➔ 7 Investigative Reports
- ➔ 4 Management Inquiries

41

Recommendations to Enhance Efficiency and Accountability of Government

100%

Recommendations Accepted/Implemented by Management

103

Complaints Received



2 Arrests



Identified/Recoverable:

\$75,021



2 Disciplinary Actions

200 Hours Community Service

Misappropriated Funds:

\$23,614

2 Employee Resignations

2 Deferred Prosecution Agreements

Questioned Costs:

\$86,850

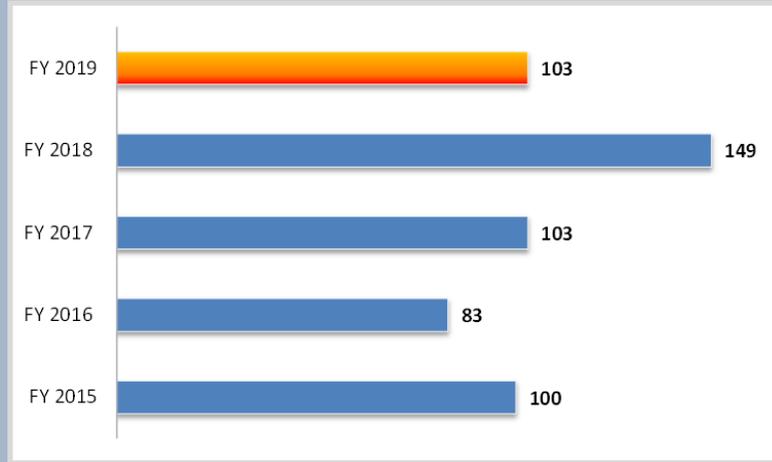
1 Employee Retirement

Restitution Ordered:

\$22,239

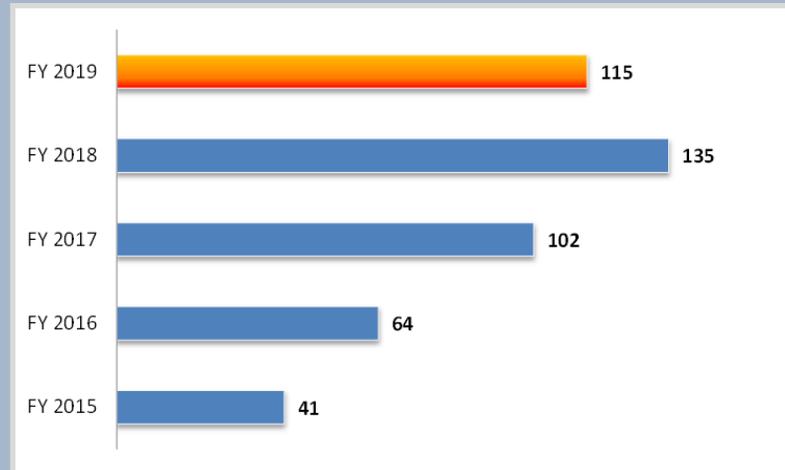
538 Total Received

Complaints Received



457 Total Closed

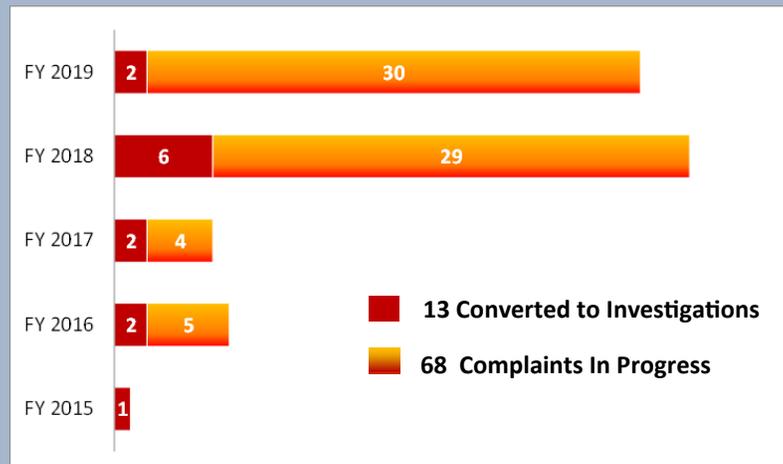
85% of Complaints Closed*



*With the exception of 2015, complaints closed include those received during prior fiscal years.

81 Total In Progress

Complaints In Progress



YATES BUILDING

CORE VALUES

Integrity: Our actions shall conform to high standards of ethical conduct and remain free from any financial, social, or other obligation that might influence the performance of our duties.

Respect: We are committed to treating all individuals with dignity and courtesy.

Accountability: Our commitment is to provide value-added service and accept full responsibility for our actions.

Objectivity: We are committed to remaining neutral and unbiased, relying on facts in the performance of our duties.

Professionalism: We are committed to our mission, demand excellence from ourselves, and comply with professional standards.



HISTORY & OVERSIGHT

Offices of Inspector General are entrusted with fostering and promoting accountability and integrity within government. The Office of Inspector General (OIG) for the City of Jacksonville began operations in October of 2014 to provide independent oversight of publicly funded activities. The OIG's responsibilities include reviewing and evaluating internal controls to protect the resources of the entire Consolidated Government against waste, fraud, inefficiency, mismanagement, misconduct, and other abuses.

VISION STATEMENT



To be the trusted oversight organization within Duval County, serving all citizens by promoting positive change and increased efficiency throughout the Consolidated Government.

Commission for Florida Law Enforcement Accreditation, Inc.



In Florida, law enforcement agencies and Offices of Inspector General may attain accredited status through the Commission for Florida Law Enforcement Accreditation, Inc. (CFA). This accreditation process includes a rigorous review

process and recognizes the professionalism and excellence of the agencies that successfully meet the accreditation requirements.

The Office of Inspector General will pursue accreditation during Fiscal Year 2020.



Association of Inspectors General

Organized in October of 1996, the Association of Inspectors General (AIG) is instrumental in assuring the professionalism of Inspectors General at both the state and local level.

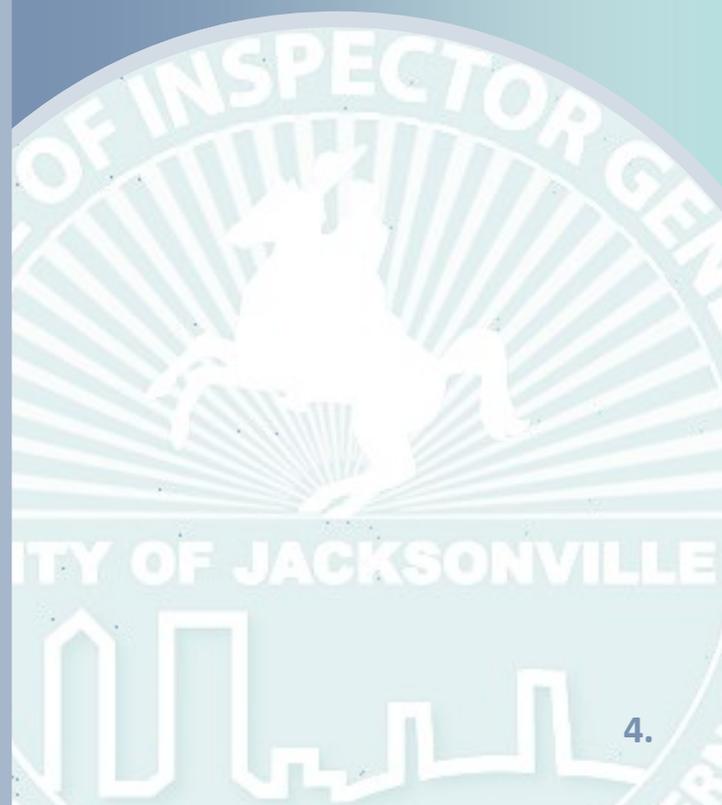
The AIG provides standards for the operations and work performed by OIGs to maintain compliance with the highest requirements for competence, accuracy, and quality. These standards are found in AIG's *Principles and Standards for Offices of Inspector General*, commonly referred to as the *Green Book*. All OIG investigators employed during Fiscal Year 2019 were AIG *Certified Inspector General Investigators*. The OIG strives to ensure that all staff in the discipline of conducting investigations or audits are certified through AIG. The OIG retains membership in both the national and local chapters of the AIG.



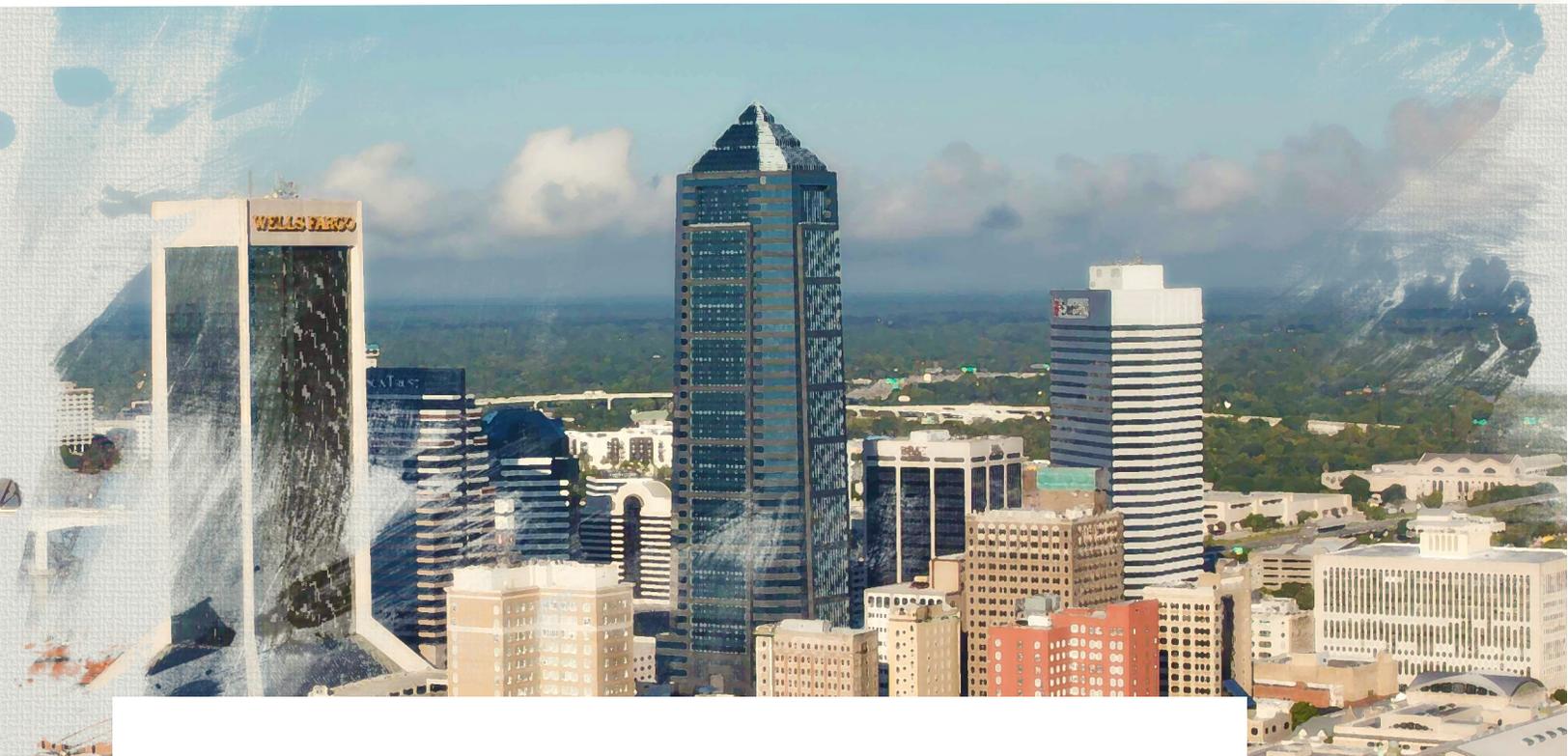
**“ENHANCING
PUBLIC TRUST IN
GOVERNMENT
THROUGH
INDEPENDENT AND
RESPONSIBLE
OVERSIGHT.”**



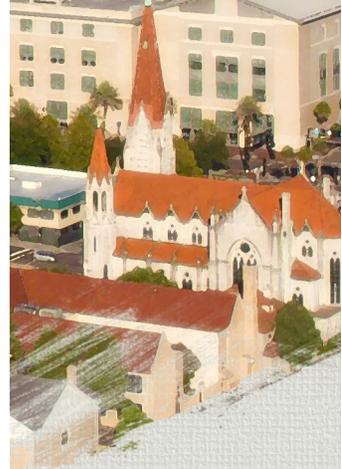
MISSION STATEMENT



JURISDICTION OF THE OIG



When the Office of Inspector General (OIG) began operations in 2014, oversight jurisdiction was limited to the City of Jacksonville and did not include the Constitutional Officers or Independent Authorities and Agencies that also make up the Consolidated Government. A Charter Referendum was passed in March of 2015 to expand the OIG's jurisdiction from the core City of Jacksonville departments, officials, and employees to include all of the Consolidated Government, effective January 1, 2016. Today, with a staff of nine full-time employees, the OIG's oversight jurisdiction includes \$5.6 billion in Consolidated Government dollars and over 12,000 employees.*



★ City of Jacksonville Government

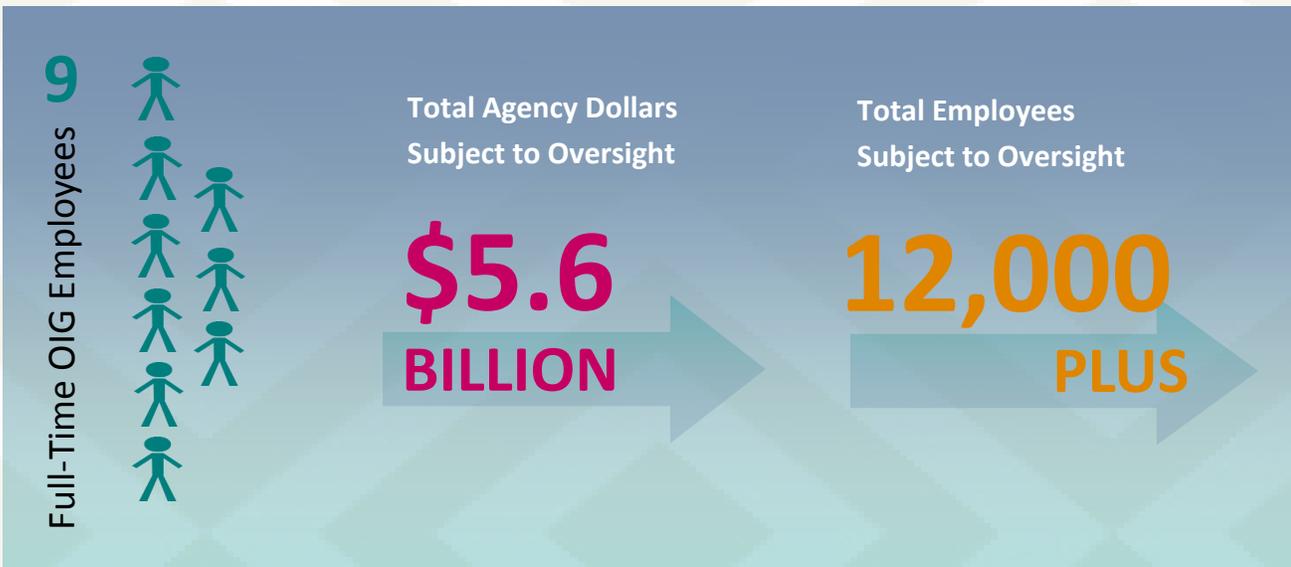
- ✓ Office of the Mayor
- ✓ City Council
- ✓ All City Departments and Offices

★ Constitutional Officers

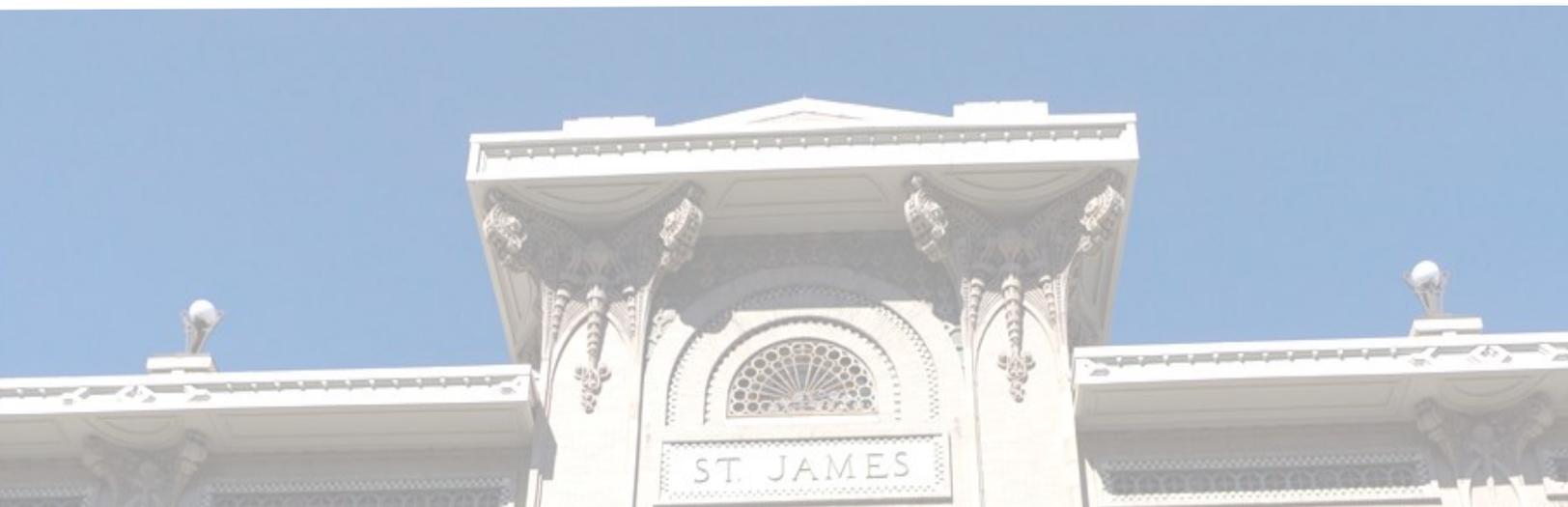
- ✓ Property Appraiser
- ✓ Supervisor of Elections
- ✓ Tax Collector
- ✓ JSO (Non-Sworn Personnel)
- ✓ Clerk of the Courts

★ Independent Agencies

- ✓ JEA
- ✓ Jacksonville Transportation Authority
- ✓ Jacksonville Aviation Authority
- ✓ Duval County School Board
- ✓ Jacksonville Housing Finance Authority
- ✓ Jacksonville Health Facilities Authority
- ✓ Downtown Investment Authority
- ✓ Jacksonville Port Authority
- ✓ Jacksonville Housing Authority

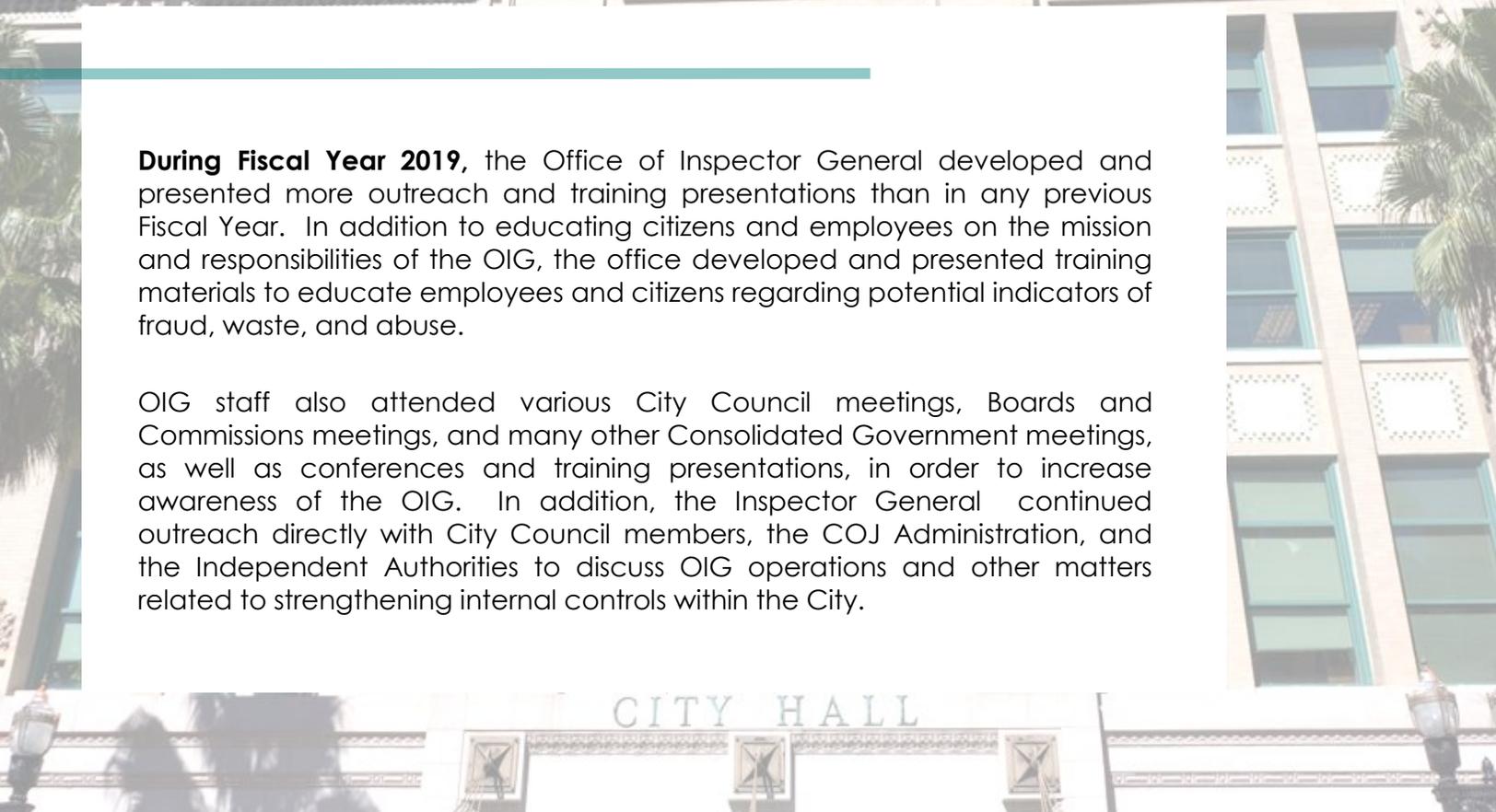


OUTREACH ACTIVITIES



During Fiscal Year 2019, the Office of Inspector General developed and presented more outreach and training presentations than in any previous Fiscal Year. In addition to educating citizens and employees on the mission and responsibilities of the OIG, the office developed and presented training materials to educate employees and citizens regarding potential indicators of fraud, waste, and abuse.

OIG staff also attended various City Council meetings, Boards and Commissions meetings, and many other Consolidated Government meetings, as well as conferences and training presentations, in order to increase awareness of the OIG. In addition, the Inspector General continued outreach directly with City Council members, the COJ Administration, and the Independent Authorities to discuss OIG operations and other matters related to strengthening internal controls within the City.



570+ EMPLOYEES TRAINED



- ✓ City Council Staff Training
- ✓ Property Appraiser Staff Trainings
- ✓ New Employee Orientations

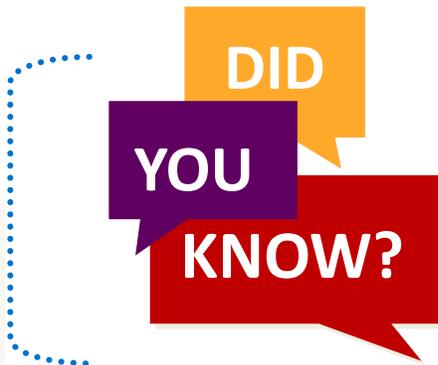
OUTREACH PRESENTATIONS INCLUDE:

- ✓ Citizen Planning Advisory Committees
- ✓ City Council Six-Month Activities Update
- ✓ Kids Hope Alliance Leadership
- ✓ Library Leadership
- ✓ Charter Revision Commission
- ✓ Jacksonville Fire & Rescue Department Leadership
- ✓ GlobalJax delegation from Russia
- ✓ GlobalJax delegation from South & Central Asia



FISCAL YEAR FUNDING

Fiscal Year 2019 provided funding for nine full-time positions within the Office of Inspector General. The overall FY 2019 budget decreased slightly from the previous Fiscal Year. The Fiscal Year 2020 budget, as approved, increased slightly from Fiscal Year 2019 due to an increase in non-discretionary costs and a de minimis increase in discretionary operating expenses.

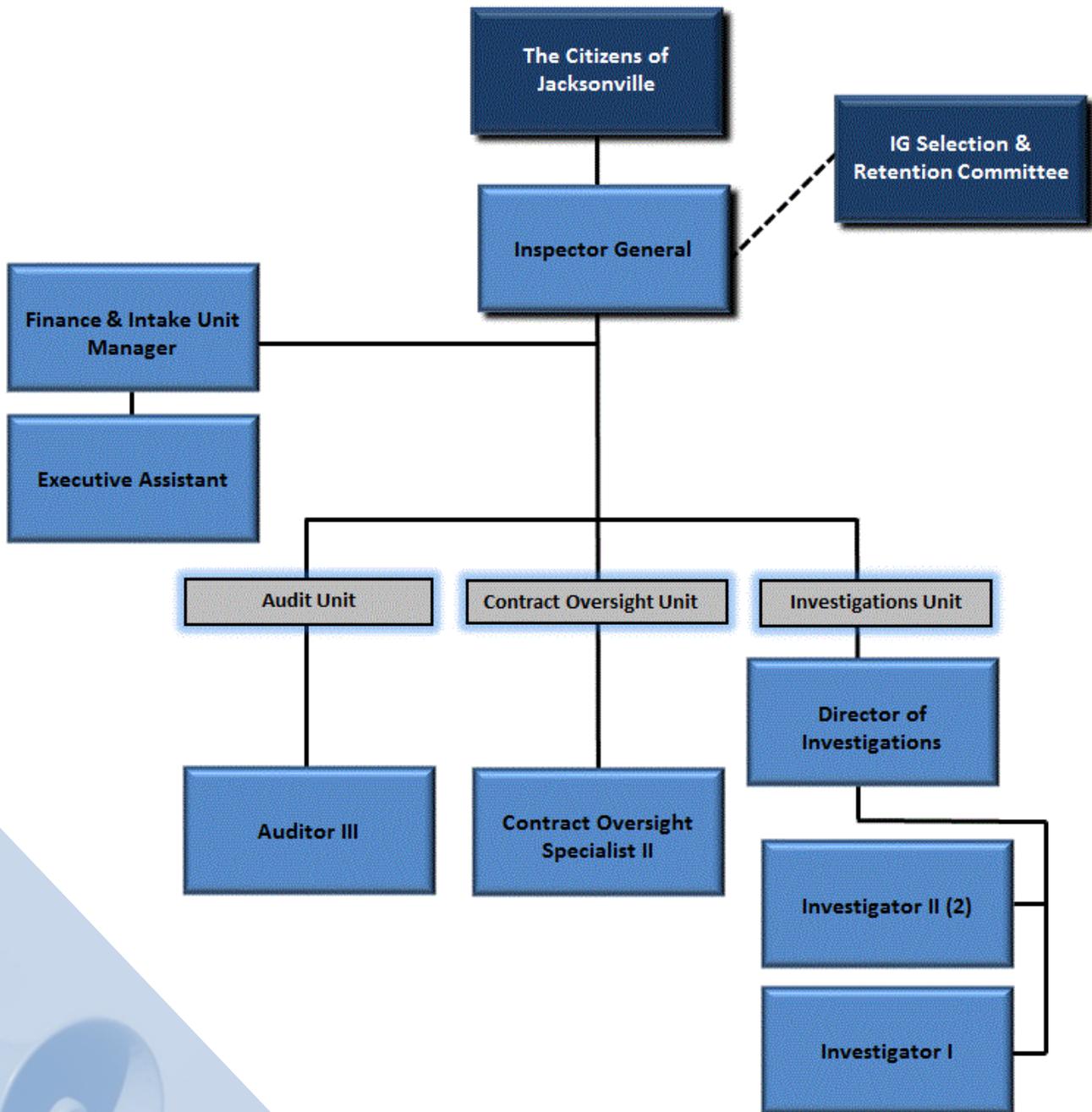


The cost per citizen, per year for OIG operations:

\$1.04*

*Calculated with information from the United States Census Bureau's July 1, 2018 population estimate for Duval County.

ORGANIZATIONAL CHART



Refer to Appendix 2 to read more about the Inspector General Selection and Retention Committee, as outlined in Section 602.305, *Ordinance Code*.



CERTIFICATIONS HELD BY OIG STAFF:

(Some staff members hold multiple certifications)



Certified Inspector General



Certified Public Accountant



Certified Inspector General Investigator



Certified Inspector General Auditor



Certified Accreditation Manager



Notary Public

CURRENT PROFESSIONAL MEMBERSHIPS:

- ✓ Fraud Prevention Association
- ✓ American Institute of CPAs (AICPA)
- ✓ Association of Certified Fraud Examiners (ACFE)
- ✓ National Institute of Government Procurement
- ✓ Institute of Internal Auditors
- ✓ Florida Police Accreditation Coalition
- ✓ Association of Inspectors General (National Chapter)
- ✓ Association of Inspectors General (Florida Chapter)



REPORTING TO THE OIG

WHISTLEBLOWER PROTECTION

Part 5, Chapter 602, *Ordinance Code*, prohibits and remedies retaliatory action taken against employees as a result of a disclosure of certain information concerning misconduct by another employee or a contractor of the Consolidated Government. The Office of Inspector General is the “Whistleblower Official,” with the responsibility of reviewing the allegations of Consolidated Government employees and granting or denying whistleblower designation.



REPORTING FORM



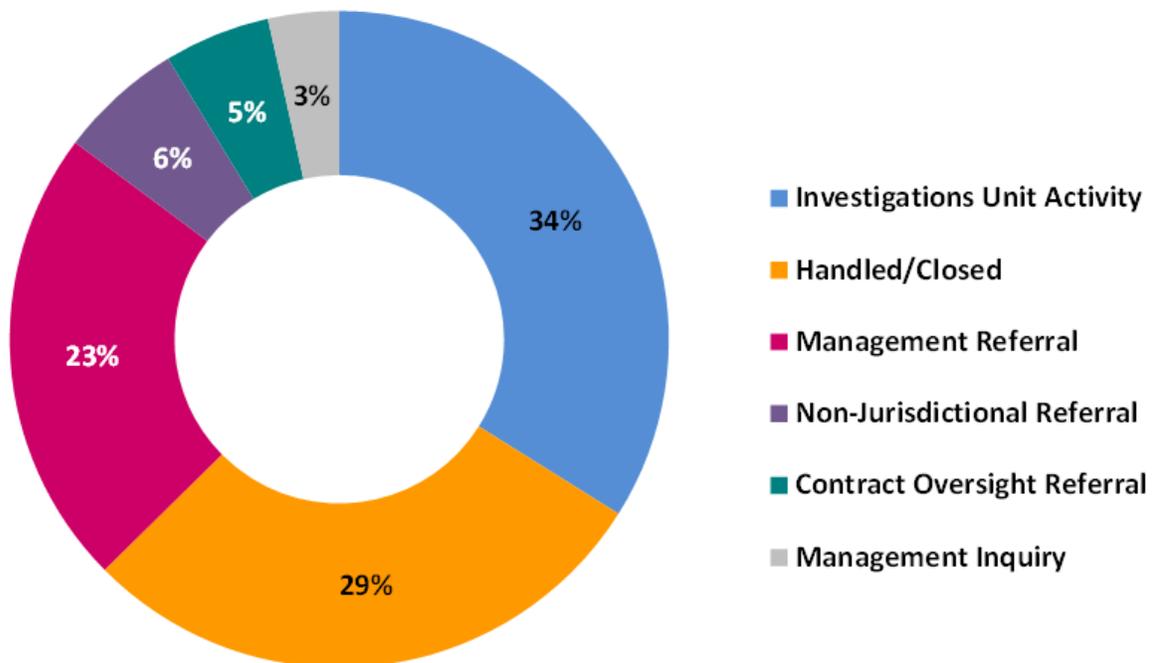
REPORTING POLICY

The City's Reporting Policy states in part, “*City Employees shall report any fraud, theft, bribery, contract mismanagement (misuse or loss exceeding \$5,000), or other violations of law, which appear to fall under the jurisdiction of the OIG on matters related to City business ... All officials and employees are expected to fully cooperate with the OIG in the exercise of the OIG's functions, authority and powers. Such cooperation shall include, but not limited to, providing statements, documents, records, and other information.*”

(Read the entire Reporting Policy in Appendix 3 on page 30).

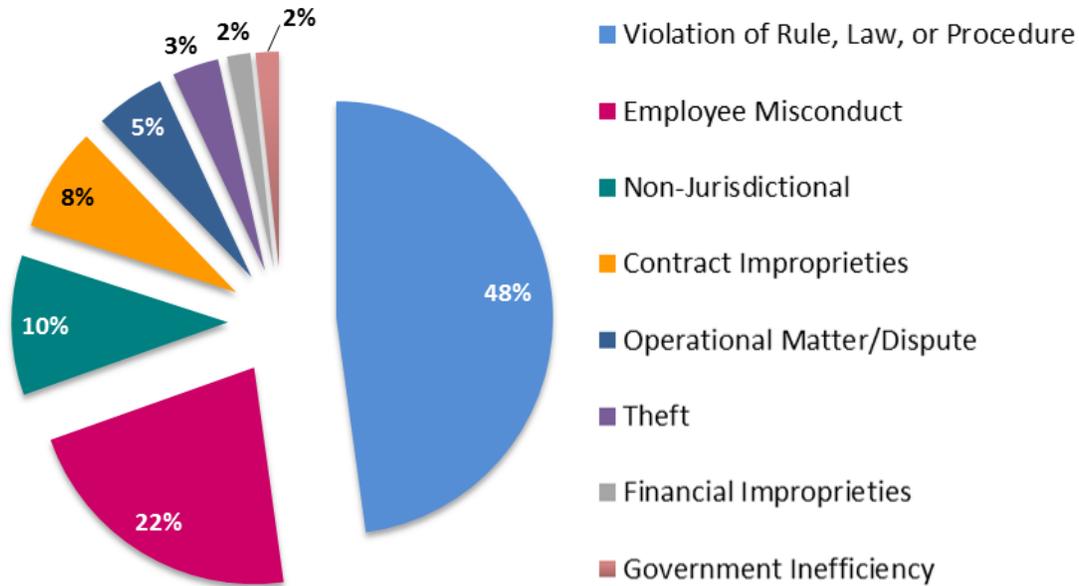
COMPLAINT DISPOSITION

The OIG closed a total of **115** complaints in Fiscal Year 2019. As closures are ongoing and overlap fiscal years, these 115 complaints include those received during prior fiscal years. The complaints were closed via the following methods of disposition:

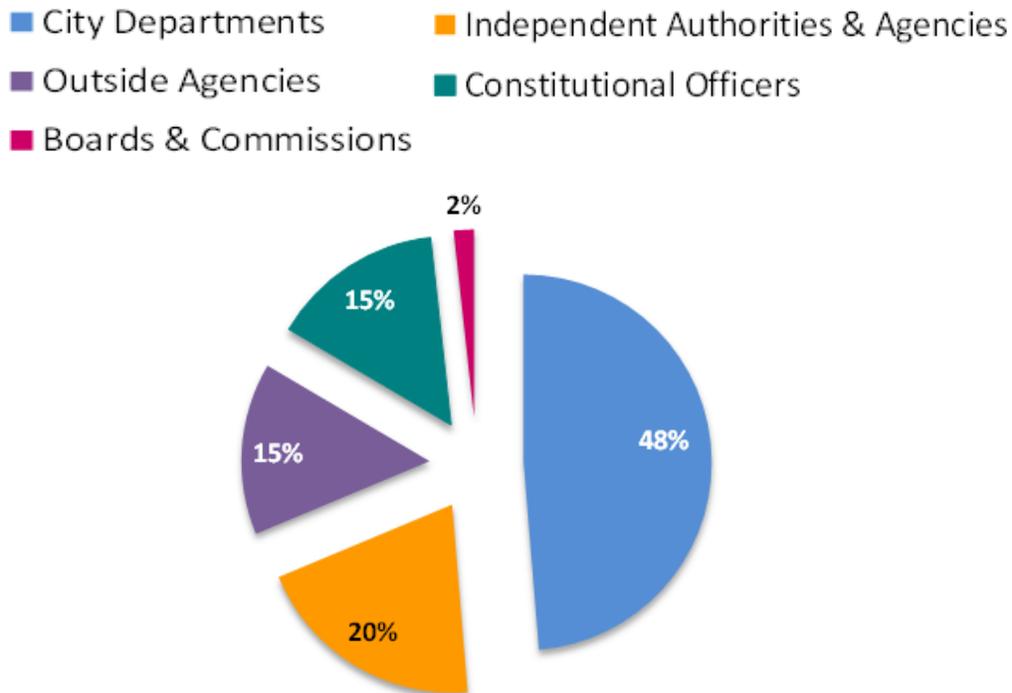


- 39** **Investigations Unit Activity:** Complaints assigned to the Investigations Unit for further review and/or investigation.
- 33** **Handled/Closed:** Complaints reviewed by the Investigations Unit requiring minimal or no action, lacking substantive information, or not falling within any of the other categories.
- 26** **Management Referral:** Complaints referred to management for handling. No response to the OIG is required. Corrective action may result from the referral.
- 7** **Non-Jurisdictional Referral:** Complaints dealing with matters outside of the OIG's jurisdiction and referred to local, state, or federal government entities for review and handling.
- 6** **Contract Oversight Referral:** Complaints referred within OIG to the Contract Oversight Unit for further review and/or handling.
- 4** **Management Inquiry:** Complaints referred to management for handling, but requiring a response to OIG. Corrective action may result from the inquiry.

Closed Complaints by Allegation Type



Closed Complaints by Entity Involved



Audit Unit

The Audit Unit provides risk-based independent audits focused on strengthening management controls in areas most susceptible to fraud, waste, and abuse, as well as improving the economy and efficiency of operations in areas where there are opportunities for significant cost savings. Additionally, the Audit Unit provides its expertise to the Investigations Unit as necessary. Audits are conducted in accordance with *International Standards for the Professional Practice of Internal Auditing*, as published by the *Institute of Internal Auditors, Inc.*, and the *AIG's Principles and Standards for Offices of Inspector General*.

Contract Oversight Unit

The Contract Oversight Unit conducts contract oversight activities to assist in fostering a procurement environment defined by openness, competitiveness, and the awarding of contracts equitably and economically. The Contract Oversight Unit has both a reactive and a proactive role. Reactively, the Unit provides support to the Investigations Unit for contract-related questions. Proactively, the Contract Oversight Unit attends many of COJ's procurement-related meetings and activities in order to conduct an on-going review. Both the reactive and proactive activities often result in the issuance of reports and recommendations to address shortcomings, irregularities, and/or opportunities for improvement.

Investigations Unit

The Investigations Unit conducts and coordinates investigations in order to detect, deter, prevent, and eliminate fraud, waste, and abuse within the Consolidated Government. Investigations are conducted in order to resolve allegations of violations of applicable Florida Statutes, the *Ordinance Code*, and/or Consolidated Government policies, rules, and/or directives. The Investigations Unit conducts investigations involving Consolidated Government officials and employees (excluding sworn personnel), as well as vendors, contractors, or consultants doing business with the Consolidated Government. Investigations are conducted in accordance with the Quality Standards for Investigations as outlined in the *AIG's Principles and Standards for Offices of Inspector General*.

UNIT ACCOMPLISHMENTS

Overview of Accomplishments

In FY 2019, the Investigations Unit, the Audit Unit, and the Contract Oversight Unit worked collaboratively to close nine investigations, and issue six Reports of Investigation, one Management Review, and four Management Inquiries. The Units also worked collaboratively to address the ongoing complaints referenced on page 2. *[Note: a Management Review is a report on an investigation into the operations of a particular program. For the definition of a Management Inquiry, please see page 13].*

In total, the OIG issued a total of **41 recommendations for corrective actions**. Management accepted **all 41 recommendations**, which resulted in updates to policies and procedures in order to strengthen internal controls throughout the Consolidated Government. The following pages highlight a portion of the work completed during FY 2019.

JEA Develops New Procedure Related to Employee Productivity as a Result of Time and Attendance Fraud

OIG Report of Investigation 2019-0003

In October of 2018, the OIG received an allegation that a JEA Electric Systems Division employee falsified time and attendance records.

The OIG and JEA Audit Services conducted a joint administrative investigation which **substantiated** the JEA employee falsified time and attendance records and received approximately \$4,637 in undue compensation.

During the investigation, the employee resigned and subsequently reimbursed JEA in the amount of \$3,794 (\$4,637 minus withheld taxes).

RESULTS: JEA established a daily operating procedure to ensure JEA employees are productively engaged during paid work hours.



2 Recommended Corrective Actions

(See Appendix 4 to Read the Recommended Corrective Actions)



*Identified Costs/Recoverable Funds are defined as losses from disbursements or activities associated with fraudulent or negligent activity, or mismanagement, which have a substantial likelihood of recovery.

RESULTS:

Allegations of Improper Actions Between a COJ Employee and a COJ Contractor

OIG Report of Investigation 2015-0005WB

In July of 2015, the OIG received a complaint regarding a COJ employee in the Right-of-Way and Storm Water Maintenance Division, Public Works Department. The OIG investigation focused primarily on three allegations relating to (1) preferential treatment; (2) contract overpayments made to a City vendor; and (3) relationship/gifts.

The OIG investigation identified and determined the following:

- ✓ The investigation did not determine the COJ employee provided preferential treatment to a City vendor during the bidding and award process of a City contract.
- ✓ COJ made overpayments to a City vendor in the amount of **\$55,339**; however, the OIG did not determine these overpayments were intentional.
- ✓ The OIG identified a total of **\$86,850** in Questioned Costs due to insufficient documentation (unable to determine if payments were made in accordance with the contract terms and specifications).
- ✓ The COJ employee had personal relationships with several of the City vendor employees. These relationships occurred during the time the vendor had ongoing contracts with the City and the COJ employee had direct or indirect oversight of the contracts.
- ✓ The investigation did not substantiate the City vendor, while under contract with the City, received any benefit from the COJ employee as a result of the personal relationships.

Results: The City implemented Procurement training for employees involved in the procurement process and created a new policy for documenting exceptions outside of contract and bid specifications. In addition, the Administration conducted an audit and identified **\$15,045** in additional overpayments and agreed to recover overpayments identified in both the investigation and the audit (total of **\$70,384**).

Following the issuance of the report of investigation, the employee retired.

*Questioned Costs are defined as costs incurred pursuant to a potential violation of law, regulation, or policy; lack of adequate documentation; or, where the intended purpose is unnecessary or unreasonable.



\$70,384

Identified Costs/Recoverable Funds

\$86,850

Questioned Costs*



1 Employee Retirement



6 Recommended Corrective Actions
(See Appendix 4)

JEA Employee Misappropriated JEA Gym Membership Dues for Personal Use and Violated Several JEA Policies

OIG Report of Investigation 2017-0009

In March of 2017, the OIG received an allegation that a JEA employee was violating JEA’s secondary employment policy and JEA’s time and attendance policy. The time and attendance allegation was **unsubstantiated**; however, the OIG investigation **substantiated** the following:

- ✓ The employee violated the JEA *Secondary Employment Policy*.
- ✓ The employee used JEA resources for both secondary employment and personal use, in violation of JEA’s *Acceptable Use Policy 2016*.
- ✓ The employee voluntarily managed a JEA employee-owned gym and misappropriated **\$11,986** from the gym bank account (comprised of membership dues) for personal use.

Results: JEA updated the JEA Secondary Employment Policy and JEA Acceptable Use Policy based on the OIG’s recommendations.

The employee was arrested for violation of Florida Statute §812.014, Theft, and resigned from JEA. In addition, the employee entered into a Deferred Prosecution Agreement and paid \$8,587 in restitution.



4 Recommended Corrective Actions

(See Appendix 4 to Read the Recommended Corrective Actions)

Investigation Finds JEA Policy Violations, Prompts Further Review of JEA Employee-Owned Gyms

OIG Report of Investigation 2017-0010

In April of 2017, the OIG received an allegation that a JEA employee who managed the JEA Downtown Gym may be violating time and attendance policies. The time and attendance allegation was **unsubstantiated**; however, the following was **substantiated**:

- ✓ The employee received a benefit of **\$755** in free gym-membership dues, in violation of JEA’s *Secondary Employment Policy*.
- ✓ The employee used JEA resources for personal use unrelated to JEA business activity, in violation of JEA’s *Acceptable Use Policy 2016*.

The investigation determined gym management duties were not included in any official job duties; however, JEA employees were managing the Gym during the course of their official work hours.



6 Recommended Corrective Actions

(See Appendix 4 to Read the Recommended Corrective Actions)

RESULTS:



\$11,986

Misappropriated Funds

\$8,587

Restitution



1 Employee Arrest

1 Deferred Prosecution Agreement

100 Hours Community Service



1 Employee Resignation

RESULTS:



JEA updated the Acceptable Use Policy.



JEA Human Resources developed a Shared Employee Guideline Policy to ensure communication and accountability of work hours for employee’s assigned to special projects.

RESULTS:

JEA management assumed responsibility for gym operations through the creation of a JEA Wellness Program.

JEA conducted an inventory of all fitness equipment.

RESULTS:



\$11,628

Misappropriated Funds

\$13,652

Restitution



1 Employee Arrest

1 Deferred Prosecution Agreement

100 Hours Community Service

Review of JEA Employee-Owned Gyms

OIG Management Review 2018-0003

Following the investigations involving JEA employees' misappropriation of gym membership dues for personal use, the OIG initiated a Management Review in December of 2017. The purpose of the Management Review was to review the processes and procedures related to JEA employee-owned gym organizations operating in JEA-owned facilities.

The Management Review disclosed:

- ✓ No contract, agreement, or release of liability existed between JEA and any of the JEA employee-owned and operated gyms.
- ✓ There was no accountability or oversight of JEA employees managing the gyms or the respective gym bank accounts.
- ✓ Neither JEA nor the JEA employee-owned gyms established written policies or procedures to govern the operations of the employee-owned gyms.



4 Recommended Corrective Actions

(See Appendix 4 to Read the Recommended Corrective Actions)

Third JEA Employee Misappropriated JEA Employee-Owned Gym Membership Dues

OIG Report of Investigation 2019-0001

During the course of Management Review 2018-0003, the OIG discovered that a JEA employee may have misappropriated funds from the gym bank account. The OIG referred the matter to the Jacksonville Sheriff's Office Integrity Unit for criminal investigation, due to possible violations of Florida Statute §812.014, Theft.

The investigations conducted by the OIG and JSO Integrity Unit **substantiated** that the employee misappropriated **\$11,628** from the Gym's bank account for personal use. In addition, the OIG determined that the JEA employee falsely testified under oath.

Results: JEA Administration advised that JEA was in the process of transitioning from employee-owned to JEA-managed gyms.

The employee was arrested, entered into a Deferred Prosecution Agreement, and agreed to pay restitution in the amount of **\$13,652** and court costs totaling approximately **\$360**.

In addition, the former employee agreed to perform **100 hours** of community service and write a letter of apology to JEA.



1 Recommended Corrective Action

(See Appendix 4 to Read the Recommended Corrective Action)

RESULTS:

Housing and Community Development Division Contract Compliance Internal Controls Strengthened

OIG Report of Investigation 2016-0001

In September of 2015, the OIG received information regarding possible procurement policy violations by an employee within the Housing and Community Development Division, Neighborhoods Department. The COJ's Council Auditor's Office released the State Housing Initiatives Partnership (SHIP) Audit #769 (SHIP Audit) which identified conflicts of interest in four Rental Rehabilitation Program Grant Agreements (contracts); specifically, company officers of the Developers were also owners of the construction companies chosen to perform rehabilitation work. The OIG's investigation focused on the employee who managed these Rental Rehabilitation Program contracts. Shortly after the SHIP Audit was released, the Administration reverted the employee to a civil service position in another City Department.

The OIG **substantiated** the following:

- ✓ The employee allowed Developers (Grantees) to hire construction companies owned by their own officers on four Rental Rehabilitation Program projects, in violation of the *Conflict of Interest* provision contained in each Rental Rehabilitation Program contract.
- ✓ The employee failed to ensure the Grantees adhered to the *Procurement* provision within each Rental Rehabilitation Program contract.
- ✓ The employee used COJ resources for personal use in violation of the COJ *Electronic Communications, Equipment and Media Policy*.

The employee retired prior to the issuance of the Report of Investigation.

- The City developed and implemented procedures to monitor the requirements and compliance of Housing and Community Development contracts.
- The City updated the Conflict of Interest provision in Housing and Community Development contracts.
- The City provided refresher training to staff regarding the requirements within the COJ Procurement Manual.



7 Recommended Corrective Actions

(See Appendix 4 to Read the Recommended Corrective Actions)

MANAGEMENT INQUIRY

2018-09-0011

Campaigning at Work



In September 2018, the OIG received an allegation that a JEA manager was actively campaigning for a Circuit Court Judge at JEA, during work hours. During a Preliminary Review, the allegation was substantiated, and the OIG submitted a Management Inquiry to JEA Management. As a result, the employee received a formal letter of counseling.



1 Recommended Corrective Action



1 Disciplinary Action

MANAGEMENT INQUIRY

2017-04-0005

Transfer of Property



In April of 2017, the OIG received an allegation that 14 City desks assigned to the Office of the Public Defender were unaccounted for and may have been misappropriated. After a Preliminary Review, the OIG could not conclusively confirm that happened to the desks; however, the review determined there was a 23-month delay in the submission of the desk transfer form to Accounting. As a result of the Management Inquiry, the City implemented changes to policies and procedures related to the transfer and disposition of property to ensure accountability and timely notifications of transfers between using agencies.



5 Recommended Corrective Actions

MANAGEMENT INQUIRY

2019-03-0005

Jacksonville City Council

In March of 2019, the OIG received an allegation involving Standards of Conduct within City Council. During a Preliminary Review, the OIG determined the City Council has no internal Standards of Conduct and issued a Management Inquiry to recommend corrective actions. In response, the former City Council President advised that the OIG's recommendations would be taken into consideration through the RULES Committee.



5 Recommended Corrective Actions

MANAGEMENT INQUIRY

2019-03-0006

Municipal Code Compliance E-mail



In March of 2019, the OIG received an allegation that a City employee sent an inappropriately-worded e-mail to a citizen in error. After a brief Preliminary Review, the OIG submitted a Management Inquiry to the Administration; as a result, the employee received written counseling.



1 Disciplinary Action

APPENDIX 1

OIG CHARTER PROVISIONS

ARTICLE 1 – GOVERNMENT AND ETHICS

CHAPTER 2 – ETHICS

Section 1.201. - Declaration of Ethics Policy.

The proper operation of responsible government requires that public officials and employees be independent, impartial, and responsible to the people; that government decisions and policy be made in the best interests of the people, the community and the government; that public office not be used for personal gain, and that the public have confidence in the integrity of its government.

Section 1.202. - Ethics code, ethics commission, inspector general.

The City of Jacksonville, acting in its capacity as a county, shall enact an ethics code with jurisdiction over the officers and employees of the consolidated government of the City of Jacksonville, its constitutional officers, and independent agencies and districts, whether elected or appointed, paid or unpaid, and to the officers and employees of the school district. Jurisdiction shall include, but not be limited to the following: The Mayor, the Sheriff, the Supervisor of Elections, the Property Appraiser, the Clerk of the Courts, the Tax Collector, City Council, JEA, the Police and Fire Pension Fund, Jacksonville Aviation Authority, Jacksonville Port Authority, Jacksonville Housing Authority, Jacksonville Housing Finance Authority, Jacksonville Transportation Authority, and the Jacksonville Health Facilities Authority. The ethics code may, as allowed by law, supplement state ethics laws.

Section 1.203 - Ethics Oversight and Compliance office and Office of Inspector General.

- (a) The ethics code provided for in section 1.202 of the Charter shall include the establishment of an independent citywide Ethics Oversight and Compliance office and an independent Office of Inspector General, each with jurisdiction over the City of Jacksonville, its constitutional officers, and its independent agencies.

APPENDIX 1

OIG CHARTER PROVISIONS (CONT'D)

- (c) The Office of Inspector General shall provide independent oversight of publicly funded activities and transactions and other local government operations. The office shall have jurisdiction to investigate, audit, and provide contract oversight, and to promote economies and efficiencies, improve agency operations, and prevent and deter waste, fraud and abuse.
- (d) The Ethics Oversight and Compliance Office and the Office of Inspector General shall, to the extent practicable and advisable, share resources, promote efficiencies and avoid duplications.

Section 1.204 - Administrative Support

- (a) Appropriate support, as determined by City Council, shall be provided to the ethics commission and to the citywide Ethics Oversight and Compliance office and to the Inspector General to carry out each of their duties and responsibilities.
- (b) Subsection (a) support shall include a mechanism to obtain documents and testimony in connection with violations of the City's ethics code.
- (c) The City and the independent agencies may enter into agreements for purposes of providing funding and administrative support for ethics and inspector general activities.
- (d) Subject to available funding, the Inspector General may, appoint, employ or retain independent legal counsel to assist with the functions of the office.

Section 1.206. - Professional Standards.

Subject to practicality and available funding, the Office of Inspector General should apply for and pursue professional accreditations for the investigative functions of the office offered by the Florida Commission for Law Enforcement Accreditation.

Section 1.207. - Inspector General Independent Selection

The City Council shall amend, enact, reenact, or recodify appropriate legislation to ensure that the hiring and removal of the inspector general shall be vested with an independent inspector general selection committee.

APPENDIX 2

OIG ORDINANCE PROVISIONS

JACKSONVILLE ORDINANCE CODE

CHAPTER 602 – ETHICS CODE

PART 3. - INSPECTOR GENERAL

Sec. 602.301. - Establishment; Office of Inspector General.

There is created an Independent Office of Inspector General. The organization and administration of the Office shall be independent to assure that no interference or influence external to the Office adversely affects the independence and objectivity of the Inspector General.

Sec. 602.302. - Purpose.

The purpose of this Part is to establish a full-time Office of Inspector General in order to provide increased accountability, integrity, and oversight of the entire consolidated government, to assist in promoting economy and efficiency, improving agency operations, and deterring and identifying waste, fraud and abuse. This Part shall not apply to the Office of the State Attorney, and the Office of the Public Defender.

Sec. 602.303. - Duties and Functions.

The duties and functions of the Office of Inspector General shall include the authority, power and responsibility to:

- (a) Review and evaluate internal controls to protect the resources of the entire consolidated government against waste, fraud, inefficiency, mismanagement, misconduct, and other abuses;
- (b) Audit, evaluate, investigate and review past and present the activities, accounts, records, contracts, procurements, change orders, grants, agreements, and other programmatic and financial arrangements undertaken by any office, agency, department, or part of the entire consolidated government, and any other function, activity, process or operation conducted by any office, agency, department, or part of the entire consolidated government; its officials and employees, contractors, their subcontractors and lower tier subcontractors, and other parties doing business with any office, agency, department, or part of the entire consolidated government, or receiving funds from any office, agency, department, or part of the entire consolidated government;

APPENDIX 2

OIG ORDINANCE PROVISIONS (CONT'D)

- (c) Conduct investigations, audits, contract oversight and reviews, issue reports, and make recommendations in accordance with applicable laws, rules, regulations, policies and past practices. Audits, investigations, inspections and reviews conducted by the Office of Inspector General will conform to professional standards for Offices of Inspector General such as those promulgated by the Association of Inspectors General; in accordance with current International Standards for the Professional Practice of Internal Auditing as published by the Institute of Internal Auditors, Inc., or where appropriate, in accordance with generally accepted governmental auditing standards. The Office of Inspector General shall develop and adhere to written policies in accordance with Florida accreditation standards for Inspector Generals;
- (d) Receive full and unrestricted access to the records of any and all officials and employees, contractors, including their subcontractors and lower tier subcontractors, of any office, agency, department, or part of the entire consolidated government and other parties doing business with any office, agency, department, or part of the entire consolidated government or receiving funds from any office, agency, department, or part of the entire consolidated government;
- (e) Receive, review, and investigate any complaints regarding projects, programs, contracts or transactions of any office, agency, department, or part of the entire consolidated government;
- (f) Establish a "hotline" to receive complaints, from either anonymous or identified persons;
- (g) Review referrals from the Director of the Office of Ethics Compliance and Oversight;
- (h) Require all officials, employees, and contractors, their subcontractors and lower tier subcontractors, and other parties doing business with any office, agency, department, or part of the entire consolidated government or receiving funds from any office, agency, department, or part of the entire consolidated government to provide statements; administer oaths; and, require the production of documents, records and other information. In the case of refusal by an official, employee or other person to obey a request by the Office for documents or for an interview, the Inspector General shall have the power to subpoena witnesses, administer oaths, and require the production of documents;
- (i) In the case of refusal to obey a subpoena served to any person, the Inspector General may make application to any court of competent jurisdiction to order the witness to appear before the Inspector General and to produce evidence, or to give testimony relevant to the matter in question;
- (j) Where the Inspector General suspects a possible violation of any state, federal or local law, he or she shall notify the appropriate law enforcement agencies;

APPENDIX 2

OIG ORDINANCE PROVISIONS (CONT'D)

- (k) The Mayor and any and all Officials of any office, agency, department, or part of the entire consolidated government shall promptly notify the Inspector General of possible mismanagement of a contract (misuse or loss exceeding \$5,000 in public funds), fraud, theft, bribery, or other violation of law which appears to fall within the jurisdiction of the Inspector General, and may notify the Inspector General of any other conduct which may fall within the jurisdiction of the Inspector General;
- (l) Engage in prevention and outreach activities, including but not limited to: develop public awareness to inform government officials and employees, as well as the general public, of the authority and responsibility of the Office;
- (m) Recommend remedial actions to be taken by any office, agency, department, or part of the entire consolidated government to overcome or correct operating or maintenance deficiencies and inefficiencies that were identified by the Office;
- (n) Issue an annual report to the Ethics Commission, the Inspector General Selection and Retention Committee, Mayor, the Council and deliver to the full City Council and the Inspector General Selection and Retention Committee a verbal briefing on activities of the Office every six months;
- (o) Monitor implementation of the recommendations made by the Office;
- (p) Monitor, inspect and review, without limitation, the operations, activities, performance, and procurement processes including, but not limited to, bid specifications, bid submittals, activities of the contractor, their subcontractors and lower tier contractors, its officers, agents and employees, lobbyists, officials and staff of any office, agency, department, or part of the entire consolidated government, in order to ensure compliance with contract specifications and detect waste, fraud and abuse;
- (q) Be notified in writing prior to any duly noticed public meeting of a procurement selection committee where any matter relating to the procurement of goods or services by any office, agency, department, or part of the entire consolidated government is to be discussed;
- (r) Establish policies and procedures to guide functions and processes conducted by the Office;
- (s) Reserved;
- (t) Exercise any of the powers contained in this Chapter upon his or her own initiative;
- (u) The Office records related to active audits, investigations and reviews shall be confidential and exempt from disclosure, as provided by F.S. § 112.3188(2) and Ch. 119;
- (v) The Inspector General is considered the "appropriate local official" of the City for purposes of whistleblower protection provided by Section 112.3188(1), Florida Statutes;

APPENDIX 2

OIG ORDINANCE PROVISIONS (CONT'D)

- (w) The Inspector General has the power to appoint, employ, and remove such other personnel as is deemed necessary for the efficient and effective administration of the activities of the office. All such appointees shall serve at the pleasure of the Inspector General and shall be exempt from civil service; and
- (x) To enforce this Chapter by all means provided by law, including seeking injunctive relief in the Fourth Judicial Circuit Court in and for Duval County.

Sec. 602.304. - Inspector General Established; Qualifications.

The Inspector General shall head the Office of Inspector General and shall have a bachelor's degree or higher from an accredited college or university, and at least ten years of experience in government auditing, investigation, or prosecutorial or criminal justice administration, public administration or business administration. A master's degree or higher is preferred. Professional certifications such as certified inspector general, certified inspector general auditor or investigator, certified public accountant, certified internal auditor, or certified fraud examiner are recommended. The Inspector General shall not have been found guilty of or entered a plea of nolo contendere to any felony, or any misdemeanor involving the breach of public trust. If not already certified as an inspector general, the Inspector General shall be required to obtain certification within 24 months of becoming the Inspector General.

Sec. 602.305. - Selection, Term, Contract, Removal and Vacancy.

- (a) *Selection.* The responsibility for selecting the Inspector General shall be vested with the Inspector General Selection and Retention Committee, hereinafter, the "Committee." The Committee shall be composed of seven members selected as follows:
 - (1) The President of the Jacksonville City Council or his or her designee;
 - (2) The State Attorney of the Fourth Judicial Circuit or his or her designee;
 - (3) The Chair of the Jacksonville Ethics Commission or his or her designee;
 - (4) The Chair of the Jacksonville TRUE Commission or his or her designee;
 - (5) The Public Defender of the Fourth Judicial Circuit or his or her designee;
 - (6) The Chief Judge of the Fourth Judicial Circuit or his or her designee; and
 - (7) The Mayor of the City of Jacksonville or his or her designee.

The chairperson of the Committee will rotate among the members of the Committee starting with the President of the Jacksonville City Council or his or her designee.

APPENDIX 2

OIG ORDINANCE PROVISIONS (CONT'D)

The chairperson will serve for a term of two years and will be followed in numerical order as outlined above. The position of chairperson is connected with the position and not the individual. The term of the chairperson will commence on July 1. If a member does not wish to serve as chairperson the position will rotate to the next member in numerical order. The Committee shall select the Inspector General with no less than four members approving the appointment from a list of qualified candidates submitted by the City of Jacksonville Employee Services Department. The Committee's selection is subject to confirmation by City Council.

- (b) *Term.* The Inspector General shall be appointed for a term of four years. The Committee shall convene at least six months prior to the end of the four-year contract term to determine whether to renew the contract of the Inspector General or to solicit new candidates.
- (c) *Contract.* The Chair of the Committee, in coordination with the Office of General Counsel, shall negotiate a contract of employment with the Inspector General. The Inspector General shall be an appointed employee exempt from civil service and shall be entitled to all rights and benefits normally accorded to appointed employees.
- (d) *Removal.* The Inspector General may be removed based on specified charges initiated by the Committee for the following: neglect of duty, abuse of power or authority, discrimination, or ethical misconduct. The Inspector General shall be provided sufficient advance notice of the reasons for the possible removal, and shall be given an opportunity to be heard on the charges. A decision of the Committee to remove the Inspector General must be approved by a minimum of four members of the Committee and be confirmed by the City Council.
- (e) *Vacancy.* In the event of a vacancy in the position of Inspector General, the Committee shall appoint an interim Inspector General until such time as a successor Inspector General is selected and assumes office. The Interim Inspector General shall meet all qualifications provided herein for the Inspector General.
- (f) In addition to the responsibility for the selection and retention of the Inspector General, the Committee will meet no less than once every six months to receive an update on the Office of Inspector General's activities and to provide support and assistance to the Inspector General. Additionally, the Committee will review the proposed annual budget for the Office of Inspector General every spring and provide any feedback or comments prior to the Inspector General presenting the proposed budget to the Mayor's Office. The Committee shall on a yearly basis evaluate the performance of the Inspector General based on criteria established by the Committee.

APPENDIX 2

OIG ORDINANCE PROVISIONS (CONT'D)

Sec. 602.306. - Records Disclosure.

The Inspector General's final reports shall be public records to the extent that they do not include information that has been made confidential and exempt from release to the public by Florida or federal law.

Sec. 602.307. - Annual Budget.

The Mayor shall establish in the annual budget a separate activity for the Office of Inspector General similar to the budget presentation of a department of the City of Jacksonville. A minimum funding base is hereby established at \$400,000 annually.

Sec. 602.308. - Coordination with City Council Auditor's Office.

The Inspector General and the City Council Auditor shall mutually cooperate, subject to their respective standards on confidentiality, and where practicable, to avoid duplication of efforts in audit functions. The Inspector General and the Council Auditor shall obtain respective approval prior to an offer of employment to their respective employees.

Sec. 602.309. - Penalty Provisions.

It shall be unlawful and a Class D offense for:

- (1) Any person to retaliate, punish, threaten, harass, or penalize any person for assisting, communicating or cooperating with the Office of Inspector General; or
- (2) Any person to:
 - (a) Knowingly interfere, obstruct, or impede any investigation conducted by the Office of Inspector General; or
 - (b) Knowingly attempt to interfere, obstruct, or impede any investigation conducted by the Office of Inspector General; or
 - (c) Knowingly falsify facts in any oral or written statement made as part of any investigation conducted by the Office of Inspector General.

APPENDIX 3

CITY REPORTING POLICY



CITY OF JACKSONVILLE

Reporting Policy

- SUBJECT:** City Officials Reporting of Matters to the Office of Inspector General.
- REFERENCE:** The Office of the Inspector General, City of Jacksonville, Section 1.203, Part 3, Chapter 602 of the City of Jacksonville Code.
- PURPOSE:** The Office of Inspector General (OIG) has the responsibility for investigating possible instances of fraud, waste, mismanagement, misconduct and other abuses by a City official, employee, contractor or any other parties doing business or that have a financial relationship with the City. This directive establishes a policy and procedure for reporting such matters to the OIG.
- POLICY:** City Employees shall report any fraud, theft, bribery, contract mismanagement (misuse or loss exceeding \$5,000), or other violations of law, which appear to fall under the jurisdiction of the OIG on matters related to City business in accordance with the procedure established herein.
- PROCEDURE:** A. Method of Reporting to the OIG: An employee, who becomes aware of a matter that may be within the responsibility of the OIG, shall promptly report their concerns/information in any of the following ways:
1. Email to: InspectorGeneral@coj.net; or
 2. Fax to: (904) 630-8003
 3. On line at www.coj.com/OIG; or
 4. U.S. Mail to the Office of Inspector General at P.O. Box 43586 Jacksonville, FL 32203; or
 5. OIG Office at (904) 630-8000.

APPENDIX 3

CITY REPORTING POLICY (CONT'D)

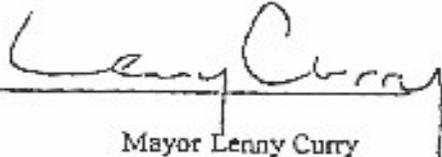
B. Whistle-blower Allegations: In accordance with this Code and the Florida Whistle-blower Act, if an employee reports any of the following directly and in writing to the Inspector General, he or she may be granted "whistle-blower" protection by the Inspector General:

1. Any violation or suspected violation of any federal, state, or local law, rule, or regulation committed by an employee or agent of an agency or independent contractor which creates and presents a substantial and specific danger to the public's health, safety, or welfare.
2. Any act or suspected act of gross mismanagement, malfeasance, misfeasance, gross waste of public funds, suspected or actual Medicaid fraud or abuse, or gross neglect of duty committed by an employee or agent of an agency or independent contractor.

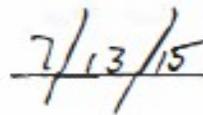
Employees should note that reporting a matter to the Inspector General pursuant to the Whistle-blower Act does not guarantee the employee "whistle-blower" protection under the Act. That is a determination which will only be made by the Inspector General after evaluation of the complaint.

C. Staff Cooperation: All officials and employees are expected to fully cooperate with the OIG in the exercise of the OIG's functions, authority and powers. Such cooperation shall include, but not limited to, providing statements, documents, records, and other information.

This policy shall not prohibit or excuse an employee from making other required reports regarding any matter in accordance with any other applicable requirement or laws.



Mayor Lenny Curry



Date

APPENDIX 4

RECOMMENDED CORRECTIVE ACTIONS

JEA DEVELOPS NEW PROCEDURE RELATED TO EMPLOYEE PRODUCTIVITY AS A RESULT OF TIME & ATTENDANCE FRAUD (OIG Report of Investigation 2019-0003)

- ⇒ Establish a written policy or procedure to strengthen internal controls to ensure accurate time reporting and oversight of those employees whose job duties include field operations and/or who perform work remotely. Provide OIG with a copy of any newly established policy or procedure.
- ⇒ Take appropriate action to recover approximately \$4,637 in salary overpayments. Provide the OIG with verification.

ALLEGATIONS OF IMPROPER ACTIONS BETWEEN A COJ EMPLOYEE AND A COJ CONTRACTOR (OIG Report of Investigation 2015-0005)

- ⇒ Ensure relevant ROWSWM employees involved in the review of responsive bids receive training regarding what the COJ deems as an “*unbalanced bid*.”
- ⇒ Establish a ROWSWM policy or procedure requiring documentation of justifications for any exceptions outside of the contract and accompanying bid specifications requirements which *do not* require a contract amendment or change order. Ensure the justification is documented and retained with the invoice or pay application, or alternate location deemed appropriate (e.g., document for any exceptions related to Site Prep, MOT, and Special Pricing).
- ⇒ Audit Contract 8258-17 and verify whether any other Site Prep overpayments were made to Jax Utilities. Provide a copy of the results of this audit and respective findings to the OIG. (This investigation only covered a review of **40** invoices related to this particular contact.)
- ⇒ As deemed appropriate, recover the **\$55,339** in identified costs, and any subsequently identified overpayments resulting from an audit of Contract 8258-17.
- ⇒ Ensure relevant ROWSWM employees receive training relating to the review and approval process of invoices or pay applications for future contracts and specifications documents to minimize and/or avoid errors related to overpayments.
- ⇒ Establish a policy or training module for COJ employees, both civil service and appointed, that provides general guidelines regarding COJ employee interactions and relationships with individuals doing business with the COJ, in order to avoid potential conflict of interests, whether real or perceived, especially when dealing with COJ contractors during the pre-award and award phase.

APPENDIX 4

RECOMMENDED CORRECTIVE ACTIONS (CONT'D)

JEA EMPLOYEE MISAPPROPRIATED JEA GYM MEMBERSHIP DUES FOR PERSONAL USE AND VIOLATED SEVERAL JEA POLICIES (OIG Report of Investigation 2017-0009)

- ⇒ Review and update JEA's *Secondary Employment Policy* and *Acceptable Use Policy* to incorporate an employee acknowledgment section. The policy revisions should include a process to require and retain the employee acknowledgement forms. Additionally, provide copies of the updated policies and verification the policies have been reissued and acknowledged by JEA employees, including all levels of management.
- ⇒ Review and update the JEA Notification of Secondary Employment on-line form to include date fields for all actions, including approval and/or rejection by JEA management. Provide the OIG with a copy of the updated form.
- ⇒ Review and update the JEA *Acceptable Use Policy* to ensure that "limited personal use" is clearly outlined, in that JEA-owned resources may be used for personal purposes on a limited basis, to include providing limitations, for example: no additional cost to JEA is incurred; no interference with work duties and assignment; no disruption to the workplace; and supervisor is aware and approves of the "limited personal use." Provide the OIG with written verification of any updates.
- ⇒ The OIG recognizes the employee-owned gyms located in multiple JEA facilities are a benefit to JEA employees. However, the investigation determined that management has no direct oversight or supervision of the activities and time dedicated to the management of the gyms by JEA employees. Review and determine if the employee-owned gyms located in multiple JEA facilities should continue to be managed by volunteer JEA employees absent any accountability or oversight of JEA. Advise OIG any decision concerning future gym operations.

INVESTIGATION FINDS JEA POLICY VIOLATIONS, PROMPTS FURTHER REVIEW OF JEA EMPLOYEE-OWNED GYMS (OIG Report of Investigation 2017-0010)

- ⇒ Per JEA Acceptable Use Policy 2016 at Section 5.3, employees are required to sign documentation that the employee has read and understood the policy. During the investigation, JEA management was unable to provide a copy of the Acceptable Use Policy 2016 employee acknowledgement form for [Employee]. Please conduct another file review to determine if a copy of [Employee's] acknowledgment form can be located. In the event that the form cannot be located, provide an explanation accordingly. Provide OIG with a copy of the form if located.

APPENDIX 4

RECOMMENDED CORRECTIVE ACTIONS (CONT'D)

- ⇒ Identify and correct any internal controls related to the retention of acknowledgment forms for JEA's Acceptable Use Policy 2016, if the acknowledgment form is not located.¹² Additionally, consider revising the existing policy to incorporate a standardized policy acknowledgment form. As part of the internal control review, determine whether updating the annual on-line training to require employees "click" and certify they have actually read the policy is appropriate.¹³ Provide an explanation as to newly established procedure(s) instituted to prevent future deficiencies related to the retention of employee acknowledgement forms. Provide a copy of the revised policy or procedure.
- ⇒ Request [Employee] read and sign an acknowledgement form for the Acceptable Use Policy 2016. Provide the OIG with a copy of the signed acknowledgement form and verification [Employee] has read and understands the policy, in accordance with Section 5.3.
- ⇒ If not already completed, as previously recommended in OIG Report of Investigation 2017-0009, review and update the JEA Acceptable Use Policy to ensure that "limited personal use" is clearly outlined in plain language to advise under what circumstances JEA-owned resources may be used for personal purposes on a limited basis, to include providing limitations, for example: no additional cost to JEA is incurred; no interference with work duties and assignment; no disruption to the workplace; and supervisor is aware and approves of the "limited personal use." Provide the OIG with written verification of any updated policy.
- ⇒ Determine whether the \$755 value [Employee] benefited by not paying membership dues is in violation of the JEA's Secondary Employment Policy. Advise OIG of JEA's determination and provide a verification that JEA's determination has also been provided to [Employee].
- ⇒ Develop a standard operating procedure to ensure managers sharing oversight of civil service employees assigned to special projects are documenting in writing (or a method deemed appropriate) the employee's work hours and absences in order to provide to the primary supervisor for time and attendance purposes.

* * *

REVIEW OF JEA EMPLOYEE-OWNED GYMS (OIG Management Review 2018-0003)

- ⇒ Determine whether JEA employee-owned gyms should continue to operate independently of JEA, without contractual agreement or release of liability for use of JEA facilities. Advise the OIG of any decisions made or actions taken regarding the future of JEA employee-owned gyms.

APPENDIX 4

RECOMMENDED CORRECTIVE ACTIONS (CONT'D)

- ⇒ Conduct an inspection of all JEA facilities to determine if any gym equipment may be in use by JEA or contracted employees in locations not already identified during this Management Review.
- ⇒ If JEA determines that the gyms should proceed, establish appropriate written procedures to ensure uniformity at all facilities regarding gym operations (i.e. maintain records, separation of duties, and purchases). Provide OIG with copies of any newly established written procedures.
- ⇒ If JEA determines that the gyms should be managed by JEA employees (voluntarily or otherwise) identify and incorporate any duties assumed by JEA employees into their formal job specifications and annual evaluations (if deemed appropriate). Provide OIG with copies of any updated job specifications.

THIRD JEA EMPLOYEE MISAPPROPRIATED JEA EMPLOYEE-OWNED GYM MEMBERSHIP DUES (OIG Report of Investigation 2019-0001)

- ⇒ Update the OIG on the status of the JEA employee-owned gyms.

HOUSING AND COMMUNITY DEVELOPMENT DIVISION CONTRACT COMPLIANCE INTERNAL CONTROLS STRENGTHENED (OIG Report of Investigation 2016-0001)

- ⇒ Develop and implement a tracking spreadsheet to monitor the requirements and compliance of Housing and Community Development contracts. Provide OIG with a copy of the tracking spreadsheet.

APPENDIX 4

RECOMMENDED CORRECTIVE ACTIONS (CONT'D)

- ⇒ Create a contract checklist and contract-monitoring matrix to be used during the life of each contract within the Housing and Community Development to ensure contract monitoring and compliance. The checklist and matrix should include a supervisory review process. Provide a copy of checklist and contract-monitoring matrix.
- ⇒ Review and update the Conflict of Interest provision in Housing and Community Development contracts. Specifically, consider separating the provisions into two categories, one specifically explaining what constitutes conflict of interest for public officials and employees and one section explaining what constitutes conflict of interest for contractors/subcontractors and/or individuals receiving funds from the City, in order to provide clarity. Provide the OIG with a copy of this verbiage change.
- ⇒ Develop policy and an attestation form for Housing and Community Development Division (program-wide) to ensure City employees formally document and certify that no conflict of interest exists between any City employee and any grantee, contractors/known subcontractors, and/or individuals applying for or receiving funds from the City. Retain the attestation form in the contract file or a location deemed appropriate. Provide the OIG with a copy of this policy and attestation form.
- ⇒ Provide refresher training to Housing and Community Development Division staff regarding the requirements within the COJ Procurement Manual (on a reoccurring timetable, as deemed appropriate).
- ⇒ Review the current Technology Use Policy, Directive - 0516 (effective March 21, 2018), specific to Limited Personal Use, "Supervisor is aware of use and approves" provision and determine what method (memorandum, e-mail blast, addendum to current policy, or informal staff meetings) should be used to provide adequate refresher training for supervisors and employees to heighten the awareness of this requirement. Further, update the policy, to establish a standardized acceptable protocol on how supervisory approval is documented to ensure compliance with this provision.
- ⇒ Request that [Employee] re-submit his secondary employment form in accordance with Secondary Employment Policy, Directive 0519 effective May 7, 2018, to ensure [Employee's] secondary employment (rental properties, if applicable) is current and on file with the City. Provide verification of compliance once completed.

APPENDIX 4

RECOMMENDED CORRECTIVE ACTIONS (CONT'D)

CAMPAIGNING AT WORK (MANGMENT INQUIRY 2018-09-0011)

⇒ Ensure JEA employees are reminded (e.g. through Currents) that both Florida Statutes and the COJ Ordinance Code prohibit political campaigning in public work places. Provide OIG with verification of such notification.

TRANSFER OF PROPERTY (MANGMENT INQUIRY 2017-04-0005)

⇒ Revise the existing City's Transfer or Disposal of Personal Property or Surplus Material form (Rev. 11/2016), Part I. The revised form should include the following:

- Add a line for the date the property is transferred and the date the property is received.
- Include a specific timeframe the form should be provided to Accounting by the receiving agency, i.e. three days after receipt of property by the receiving agency.
- Update the form to provide a section for Accounting to document and date when the inventory has been updated to reflect the property transfer between the using agencies.

⇒ Establish a procedure to ensure Accounting provides a copy of the completed transfer form back to the respective using agencies for file retention.

⇒ Update Procurement Memorandum: #15-02, dated March 18, 2015 (Attachment 3), to include a timeframe for using agencies to provide the transfer form to Accounting (Attachment 3, bullet number 2), and attach a copy of the revised transfer form. Additionally, update the point of contact for Surplus on the last page under General Surplus Yard Information.

⇒ Request the Accounting Division revise the Capital Assets and Annual Tangible Inventory Management Training PowerPoint (revised June 27, 2018) to ensure the using agencies know they are responsible for providing Accounting with the transfer form (within the established timeframe) after receipt of the transferred property.

⇒ Please provide the OIG with any updated forms, memorandum, and training materials. Also, provide verification the memorandum and updated transfer form have been distributed to using agencies.

APPENDIX 4

RECOMMENDED CORRECTIVE ACTIONS (CONT'D)

JACKSONVILLE CITY COUNCIL (MANGMENT INQUIRY 2019-03-0005)

- ⇒ Establish, as deemed appropriate, a Code of Ethics (or Standard of Conduct) and/or update current Council rules and/or policy, which outlines expectations related to professional conduct while serving on the COJ's City Council to ensure that CM's are accountable to their peers for their actions, and that each member acts in a responsible manner in order to not discredit or embarrass the City, including other elected officials, citizens and the public while serving in an official capacity. Provide the OIG with a copy of any established or updated policies/procedures.
- ⇒ Establish procedures, as deemed appropriate, which provides for progressive disciplinary action(s), when deemed appropriate for violations of the established Code of Ethics (or similar governing doctrine), which includes identifying the responsible party or parties (e.g. the Council President or the entire City Council) for the decision and administration of any progressive disciplinary action. Provide the OIG with a copy of any established or updated policies/procedures.
- ⇒ Review existing COJ policies/procedures with the Director of Employee Services, and determine which COJ policies CM's should be required to acknowledge receipt of and adhere to, including but not limited to:
 - Employee Services Directive-0528 Anti-Harassment and Discrimination Policy and Complaint Procedure, effective July 6, 2018; Employee Services Directive-0532 Workplace Violence Policy, effective January 28, 2019; Employee Services Directive-0529 Social Media- What is Acceptable/Not Acceptable, effective March 21, 2018; Employee Services Directive-0516 Technology Use Policy, effective March 21, 2018; and Employee Services, Security Awareness Training Policy, effective October 1, 2018.
 - Update City Council Rules (or appropriate governing doctrine) to identify the COJ policies/procedures deemed to be those that CM's should be required to acknowledge and abide by. Provide the OIG with a copy of any established or updated policies/procedures.
- ⇒ Establish procedures, as deemed appropriate, which provides for progressive disciplinary action(s), when deemed appropriate, for violations of COJ policies/procedures by CM's, which includes identifying the responsible party or parties (e.g. the Council President or the entire City Council) for the decision and administration of any progressive disciplinary action. Provide the OIG with a copy of any established or updated policies/procedures.
- ⇒ Provide verification that any newly established or updated policies/procedures have been distributed or made available to all current CM's.

APPENDIX 5 FISCAL YEAR 2020 AUDIT PLAN

FY 2020 Audit Plan

Audit	Preliminary Objectives
Project: Sunshine State Law Compliance Division: City Council Status: Scheduled	Biannual review of Council notices, meeting locations, and minutes and report on the Council's compliance with the Jacksonville Sunshine Law Compliance Act.
Project: Kids Hope Alliance Division: Non Profit Status: Pending	To review processes, controls, and recipients of \$300,000 mini grant and the usage of funds as approved by City Council.
Project: 2020 Risk Assessment Division: N/A Status: Scheduled	Conduct the risk assessment for the 2020 audit plan, expanded to include management interviews and surveys.
Prior Audit Follow Up Status: In Progress	Conduct follow up testing to ensure deficiencies noted in prior year audits have been corrected.



OFFICE OF INSPECTOR GENERAL
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Jacksonville, FL 32202



HOTLINE

REPORT FRAUD, WASTE, & ABUSE

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