



City of Atlanta Ethics Office 2010-2011 Work Plan

The Ethics Officer, in conjunction with the City of Atlanta's Board of Ethics, proposes a two-year work plan for the calendar years 2010 and 2011. This work plan seeks to execute faithfully the duties of the office as established by city law, create a culture of ethics in the City, and assure that the City enjoys the full credit and trust of its citizens as a government that conducts itself in an ethical manner.

Operations

1. Adopt a Code of Conduct for the Board of Ethics, including the filing of an annual statement of personal interest.
2. Develop a leadership transition plan for both the Board of Ethics and Ethics Office staff.
3. Institute a formal orientation for newly appointed members of the Board of Ethics on its jurisdiction, substantive provisions of the Code of Ethics, and its role as a quasi-judicial body in enforcement proceedings and encourage all new members to attend an ethics workshop during the initial year of their three-year term of office.
4. Clarify the role of the Board of Ethics in setting the ethics officer's term of office.
5. Improve knowledge and skills of staff by attending professional conferences related to ethics, investigations, and office software; researching policies and practices in other jurisdictions; and participating in local and national ethics organizations.
6. Establish the position of Ethics Officer at the senior management level to make it commensurate with other city employees with comparable authority and responsibilities and upgrade the associate ethics officer position to a pay grade equivalent to the assistant city attorney position.

Training

7. Conduct ethics workshops within twelve months for the newly elected City Council and for senior management in every city department in the executive branch.
8. Hold citywide ethics training workshops twice a year for city employees, board members, appointed city officials, and neighborhood planning unit officers.
9. Update ethics training workshops for new employees, *Don't Get Conflicted Out*, and current employees, *There's No Such Thing as a Free Lunch*, based on advice sought, complaints filed, and employee evaluations of the workshops.
10. Develop an online ethics training course for employees.

11. Develop a continuing ethics education series, *Ethics at the Movies*, using film clips to illustrate ethical dilemmas.
12. Attend city-sponsored workshops for developers and vendors to explain how the Code of Ethics applies to companies seeking to do business in and with the City.
13. Seek enactment of a city policy requiring mandatory ethics training for all city officials and employees:
 - a. Requiring every city employee to attend an ethics workshop in person within three years and
 - b. Requiring new city employees and board members to attend a workshop within six months of their appointment.

Rendering Advice

14. Continue to respond to requests for advice in a timely, consistent, understandable, and persuasive manner with a target of answering 75 percent of all requests within one week and 90 percent within one month.
15. Report to the Board annually on informal advisory letters and other written advice given by the Ethics Office to employees and officials; evaluate that advice to identify recurring questions to address in training, possible topics for publications, and changes needed in city-wide policies and practice; and establish an internal database of opinions.
16. Identify appropriate topics for Board to address in formal advisory opinions and ethics advisories, including an ethics advisory on gifts and gratuities.

Public Education and Outreach

17. Update the Integrity Matters public education campaign that encourages officials and employees to act with honesty and integrity; research current knowledge and attitudes of city employees about ethics; design new posters; and use other media, such as public service announcements and online quizzes, to encourage decisions in the best interest of the City.
18. Establish a process for informing and educating new employees about the Code of Ethics:
 - a. Institute policies and procedures for new employees to acknowledge and sign the Employee Pledge to Abide by the Ethics Code and
 - b. Identify and notify new employees who are required to file a financial disclosure statement about the filing requirement.
19. Establish a process for notifying departing employees about the post-employment rule and financial disclosure filing requirement:
 - a. Establish a citywide procedure for departing employees to review and sign the Employee Pledge to Abide by the One-Year Cooling Off Period and financial disclosure law and
 - b. Identify and notify employees leaving city employment about the Ethics Advisory on Post-Employment and the financial disclosure filing requirement.

20. Draft and disseminate literature on the conflicts of interest prohibited in the Code of Ethics that addresses specific populations and issues, including:
 - a. Ethical Guidelines for Prohibited Sources
 - b. Ethics Advisory on Gifts and Gratuities
 - c. Key Ethics Rules for City Employees
 - d. Key Ethics Rules for Elected City Officials.
21. Publish the enewsletter, *Ethics Matters*, three times a year.
22. Create a new website for the Board of Ethics to enable better public access to information, searchable databases of advice and enforcement cases, and a private site to post materials for board meetings.
23. Create an annual ethics award to recognize extraordinary acts by employees, elected officials, and board members who comply with city's ethical standards and avoid conflicts of interest.
24. Issue a guide on conflicts of interest for neighborhood and civic groups that seek to influence city policy, planning, and development within the City of Atlanta.
25. Report each year to the Mayor, City Council, and Atlanta citizens on the state of ethics in city government, the handling of complaints received on the ethics and compliance hotline, and the actions taken to implement this work plan.

Investigations and Enforcement Actions

26. Conduct timely, thorough, and fair investigations of all ethics complaints by:
 - a. Initiating and amending complaints, as needed, against city employees and officials for violations of the city's standards of conduct
 - b. Establishing a standard procedure for investigating complaints in areas of joint jurisdiction with departments, including misuse of city property
 - c. Completing investigations of ethics complaints within six months in 75 percent of all cases and resolving all new ethics cases within two years of the filing of the complaint and
 - d. Eliminating the existing backlog of four ethics cases that are more than two years old.
27. Continue to improve the ethics enforcement process by:
 - a. Using the board's subpoena power to obtain necessary appearances, testimony, and documents
 - b. Establishing guidelines to assist the Board in imposing fair and consistent punishment for ethics violations
 - c. Seeking a test case involving an ethics violator who has failed to comply with a Board opinion or decision and hiring, as needed, a pro hac vice solicitor to file an accusation and prosecute the case in Municipal Court
 - d. Strengthening relations with internal investigators and local, state, and federal law enforcement agencies and
 - e. Seeking amendments to the code that strengthen the board's authority to impose appropriate penalties, enforce its decisions, and collect fines.

28. Encourage timely and thorough investigations of Integrity Line complaints and consistent and fair discipline among departments by:
 - a. Referring complaints to departments for investigation within one week of receipt
 - b. Seeking completion of investigations by departments with 90 days in two-thirds of the cases
 - c. Reporting to department heads on any complaints pending for more than 180 days and
 - d. Investigating any conflict of interest questions raised in Integrity Line calls
29. Report to the Board annually on complaints, investigations, and enforcement actions received by the Ethics Office and Integrity Line and evaluate closed cases to identify patterns of misconduct and recurring problems to address in training classes and publications and changes needed in city-wide policies and practices to detect and deter similar unethical or illegal conduct.
30. Establish a system for monitoring compliance with the city's laws on conflicts of interest, including the following actions:
 - a. Develop a checklist for departments to review and evaluate their policies and practices on avoiding conflicts of interest and a scorecard for rating their compliance with the rules
 - b. Seek an annual review by departments of outside employment forms for conflicts of interest and
 - c. Audit one department's policies and practices on outside employment.

Financial Disclosure

31. Continue efforts to increase filing rates of financial disclosure statements by:
 - a. Educating new and departing employees and board members employees about the filing requirement in advance of the filing season
 - b. Sending reminder notices about the filing deadline by letter, postcard, and email to nonfilers
 - c. Bringing enforcement cases against violators in a timely matter with a target of resolving all cases involving late filers and nonfilers by July each year and
 - d. Seeking a test case of a current employee who fails to file and hiring, as needed, a pro hac vice solicitor to prosecute the case in Municipal Court.
32. Audit city financial disclosure statements to ensure the accuracy and completeness of the statements and notify filers and department heads about potential conflicts of interest disclosed in reports.
33. Report to the Board annually on timely filers, late filers, and nonfilers of the financial disclosure statements and the gift, travel, and conflict of interest reports.
34. Increase the filing of other city disclosure forms by notifying employees and officials about the filing requirements for disclosure reports involving gifts, travel, and conflicts of interest.
35. Enhance the Ethics Disclosure System by posting online, if not otherwise available, the campaign contribution disclosure reports filed by candidates for municipal office as required under state law.

Legislation and Lobbying

36. Strengthen ethics enforcement laws to provide adequate civil remedies for enforcing Board decisions, including:
 - a. Collection of fines imposed by the Board in a civil action
 - b. Automatic removal from office of any board member who fails to file an annual financial disclosure statement and
 - c. Full compliance with all financial disclosure laws as a precondition to a person's appointment or election to a board or NPU.
37. Seek compliance with the state law requiring registration of local lobbyists.
38. Seek mandatory ethics training through legislation or an administrative order.
39. Seek Charter status for the Board of Ethics and ethics officer.