



CITY OF ATLANTA BOARD OF ETHICS 2017 ANNUAL ETHICS REPORT



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FROM THE ETHICS OFFICER

As the Ethics Office begins its fifteenth year, it is committed to making sure that ethics is *how the City does business* and serves the citizens of Atlanta. I strongly believe that to be effective, the City's ethics program must be a living entity, always growing and evolving to support its environment. We approach this on a broad level by focusing on continuous education and open transparent government, and on a more targeted level by monitoring at-risk areas and identifying problems at an early stage.

Continuous education is critical to a strong ethical culture. This has become a **major priority** for the Ethics Board and Office. We provide both general and tailored training citywide. General ethics training heightens awareness among city officials and employees and provides them with tools to make sound ethical decisions. The Ethics E-learning course was launched in 2015 to provide general ethics training; to date, 7,354 employees have taken the course. New employees receive general ethics training during New Employee Orientation sessions. Tailored training targets departments which may be at risk for ethical missteps and works to address specific questions employees may have about ethics. Tailored training is recommended because it provides a safe venue to resolve complex ethical dilemmas in theoretical situations. At a department's request, the Ethics Office develops interactive sessions using a variety of training tools to address specific ethical issues tailored to a specific audience.

Open government and transparency promotes the public trust and the City's disclosure requirements support transparency. Certain city officials and employees must complete financial disclosure filings to avoid potential conflicts of interest. Gifts given to the City, travel provided by non-city sources, and conflicts of interests must also be disclosed when they arise. The filings are completed electronically and are available online for public viewing. The Ethics Office is developing a new electronic disclosure system which will be launched in 2018.

The Ethics Office is also committed to a culture that addresses misconduct when discovered and fixes problems in their infancy to avoid damage to the City's reputation. Adherence to fair, equitable and consistent policies and procedures should be the guiding principles citywide.

The City of Atlanta has a place in history and to maintain a strong public image, it must pay close attention to its ethics and be committed to a culture built on integrity and trust.

Jabu M. Sengova
City Ethics Officer



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I. 2017 HIGHLIGHTS BY THE NUMBERS

A. Advice

- Provided timely ethics advice in 126 requests for written and/or verbal advice, issued one Formal Advisory Opinion, three informal advisory letters, and responded to requests for general information on ethics.
- Responded to 100 percent of all requests for advice within seven days.

B. Financial Disclosure

- Recorded 43 financial disclosure cases involving delinquent or late filers for which enforcement was pursued. Of 12 late filers, administrative decisions were written in each case imposing a fine according to the fine schedule located in the rules of the Board of Ethics. Of 31 non-filers, administrative decisions were written in each case imposing a \$500 fine for their failure to comply with the city financial disclosure laws. Conducted 26 board hearings (14 non-filers and 12 late filers). Assessed \$9,100 and collected \$600 in fines in financial disclosure cases.
- Achieved a timely filing rate of 96 percent of the 2,746 persons required to file the 2017 City Financial Disclosure Statement; a two percent increase over 2016 despite the addition of 197 required filers in 2017.
- Awarded the Transparent Diamond Award to nine city departments and 40 city boards and commissions with exemplary financial disclosure filing records.

C. Investigations and Enforcement

- Received 113 Integrity Line Reports;
- Referred 88 Integrity Line Reports to other departments for investigation;
- Dismissed 20 non-ethics complaints for lack of jurisdiction;
- Opened seven new ethics cases;
- Closed six cases. Of the cases closed, one was closed after reaching a settlement agreement, one was dismissed following a probable cause hearing, and four were investigated and closed administratively;
- Issued two cease and desist orders;
- Assessed and collected \$375 in fines in ethics cases;
- Investigations remain pending in five open cases



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D. Operations

- Held seven board meetings, two board retreats, and one staff retreat.
- Prepared and presented to City Council legislation enabling the use of funding earmarked for capital project upon selection of vendor.
- Legislation passed by City Council and signed by the Mayor amending appointment process for Board of Ethics.

E. Public Education and Outreach

- Distributed 3,150 wallet cards, brochures, and other materials for the ongoing Integrity at Work campaign;
- Continued administration of ethics e-Learning course for employees;
- Held lunch and learn session on ethical decision making for employees;
- Published four public news blasts on atlantaethics.org;
- Published Fall edition of the e-Newsletter *Ethics Matters* and Holiday newsletter.

F. Training

- Provided ethics training to 2,634 employees, which included classroom training of 901 employees and online training for 1,733 employees through the Ethics e-Learning course.
- Received 722 signed ethics pledges.

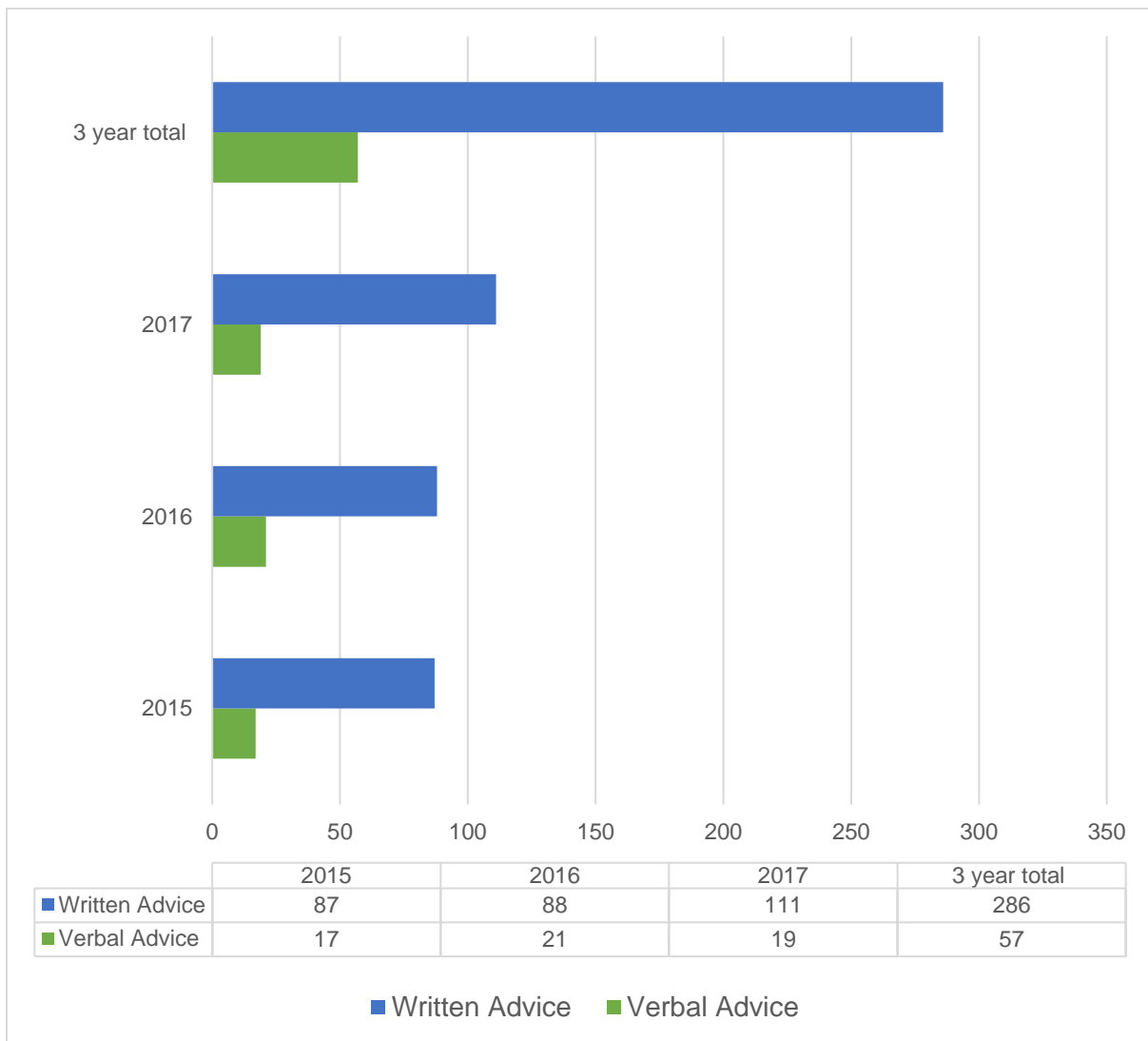


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II. REPORT ON ETHICS ADVICE

The Ethics Office wrote 107 advisory emails, letters or memos, and provided advice over the telephone or in person 19 times in 2017.

Written vs. Verbal Advice: 2015-2017

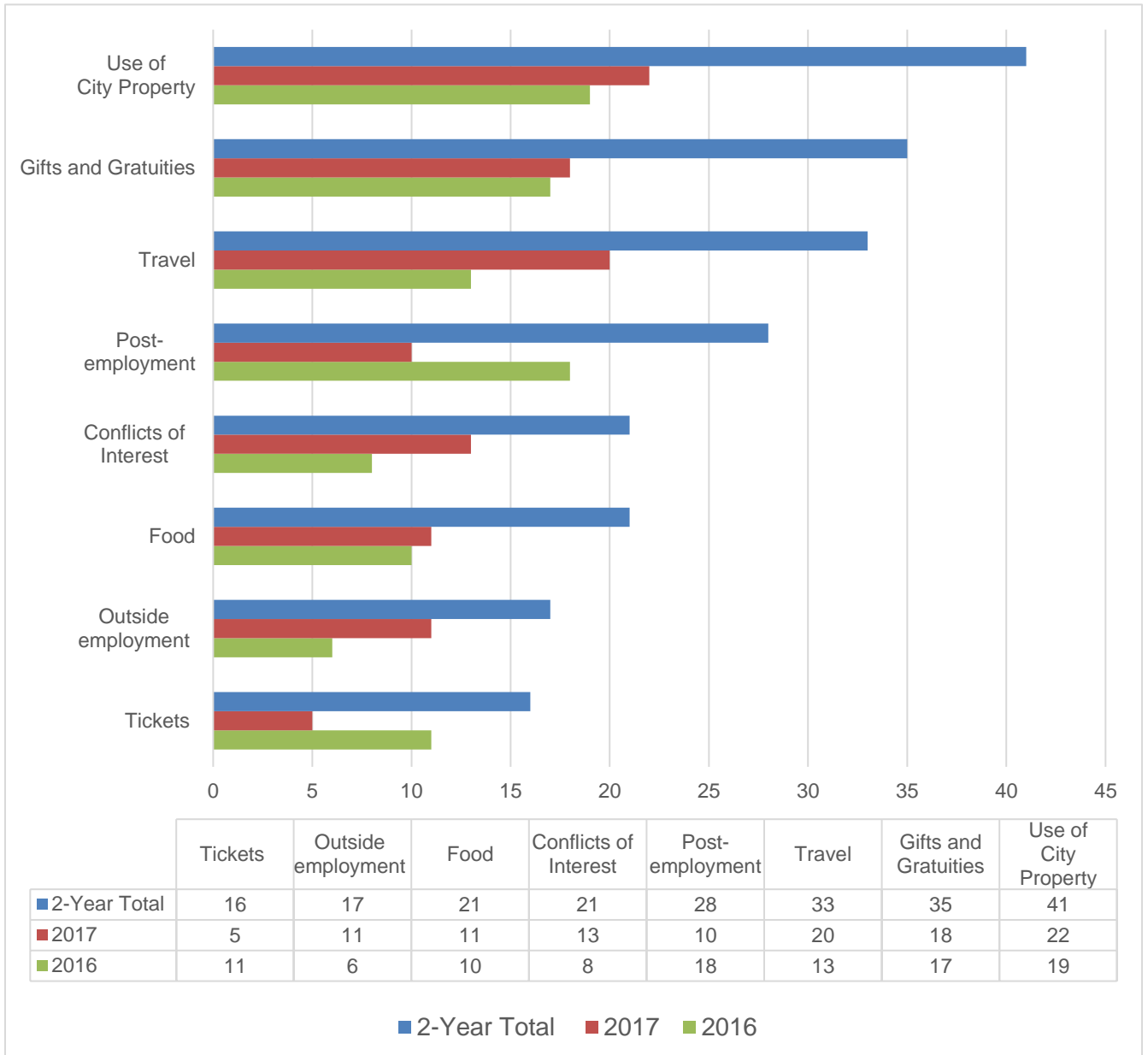


**Note: Written advice includes both formal and informal advisory opinions and letters*



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Top Subjects for Advice: 2016 vs. 2017





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Type of Advice Provided: 5-year Totals

All Advice	2013	2014	2015	2016	2017	5-year Total	5-year Total %
Verbal advice	60	45	17	20	19	161	30%
Written advice	41	54	81	87	107	370	68%
Informal advisory letter	0	1	4	1	3	9	1%
Formal advisory opinion	1	0	2	0	1	4	1%
Total	102	100	104	108	130	544	100%

Top Subjects for Advice: 2013 – 2017

Subject	2013	2014	2015	2016	2017	2-year Total (2016-17)	2-year Total %
Conflicts of interest	38 (1)	30 (1)	11 (3)	8 (7)	13 (4)	21** (5)	17%
Gratuities/gifts	27 (2)	16 (2)	23 (1)	17 (3)	18 (3)	35 (2)	29%
Outside employment	13 (4)	3 (9)	5 (6)	6 (8)	11 (5**)	17 (7)	14%
Use of city property	21 (3)	9 (4**)	20 (2)	19 (1)	22 (1)	41 (1)	34%
Food	6 (6**)	10 (3)	9 (4**)	10 (6)	11 (5**)	21** (5)	17%
Travel	1 (8)	7 (6**)	9 (4**)	13 (4)	20 (2)	33 (3)	27%
Contract participation		1 (11)	1 (8)		3 (9)	3 (11)	2%
Doing business with city/post-employment	6 (6**)	7 (6**)	6 (5**)	18 (2)	10 (6)	28 (4)	23%
Code of Ethics, Ethics Board, & disclosure Forms		2 (10)	3 (7)	4 (9**)	4 (8)	8 (10)	7%
Financial Disclosure	6 (6**)			1 (10)		1 (12)	1%
Solicitation	5 (7)	6 (8)	6 (5**)	4 (9**)	5 (7**)	9 (9)	7%
Tickets	11 (5)	9 (4**)	6 (5**)	11 (5)	5 (7**)	16 (8)	13%

**Note: Numbers in parenthesis indicate subject rank during the time-period indicated*



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Adopted Formal Advisory Opinions

FAO-17-001

Appearance of Impropriety¹

Opinion Summary: The Code of Ethics seeks to protect the integrity of city government by prohibiting city officials and employees from engaging in conflicts of interest. Specifically, the ethical standards prohibit officials and employees from participating in business activities, rendering services, or having contractual, financial, or personal interests that conflict with the individual's official duties or the city's best interest or would create the appearance of a conflict or impropriety to the public that would impair the individual's independence or objectivity in the performance of his or her official duties. It is often difficult for an official or employee to see that there may be an appearance issue in regards to his or her actions or conduct even when there is no apparent conflict, and it is important for the Ethics Board and Ethics Officer to provide clear guidance to avoid any improprieties.

Adopted by Board of Ethics: May 18, 2017

¹Visit www.atlantaethics.org to read the full text of Formal Advisory Opinion 2017-1



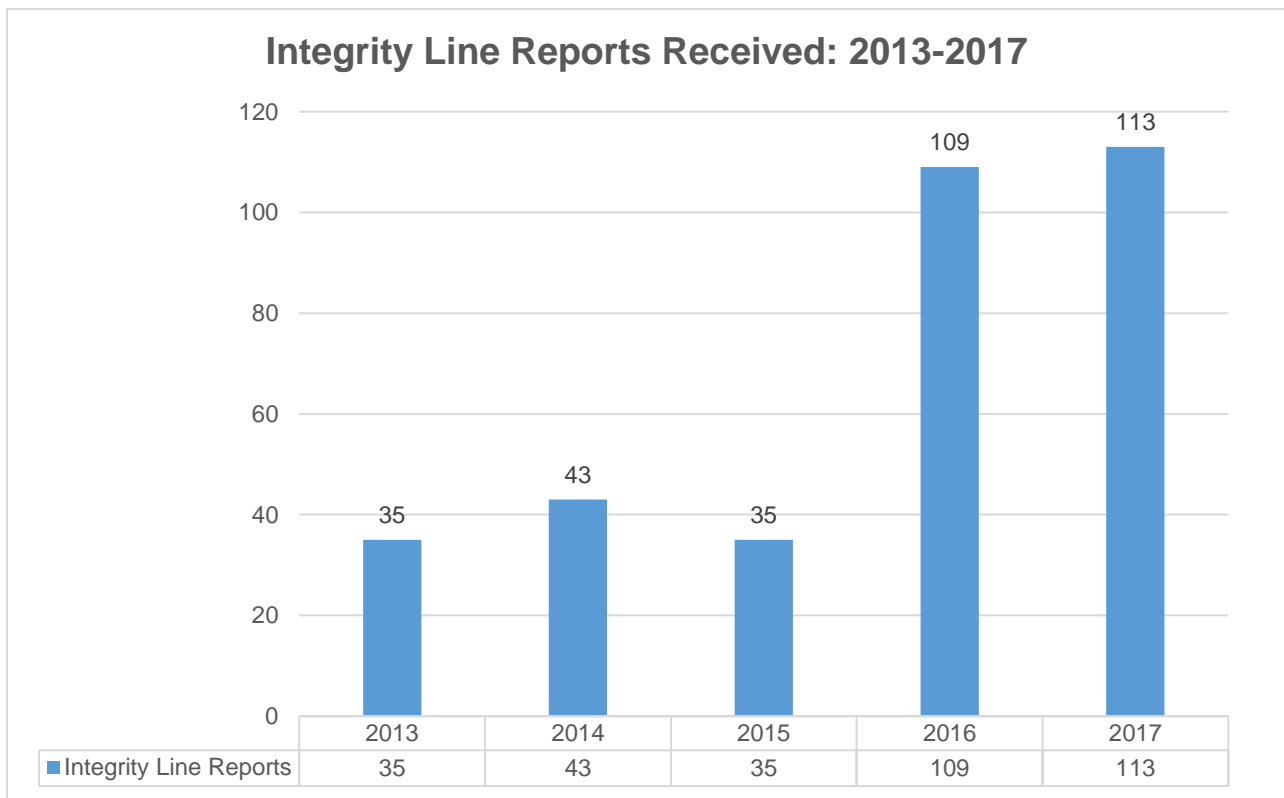
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III. REPORT ON INTEGRITY LINE

The City's Integrity Hotline was established in 2006 as a vehicle to report unethical, fraudulent or illegal activity. The hotline's steering committee includes representatives from the Ethics Office, City Auditor's Office and the Department of Law's Compliance Unit.

- 2017 saw a slight increase in call volume for the Integrity Line. Continued efforts by the Integrity Line Committee and other city departments to promote hotline awareness through new employee orientation, classroom training, and online training opportunities, likely contributed to the increased reporting volume.
- There were 113 Integrity Line Reports received by the Integrity Line Committee in 2017; a small increase from the 109 Reports received in 2016.

The chart below reflects the overall change in reporting volume for the past five years:





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The chart below reflects the number of Integrity Line Reports received by report category.

