

**City of Atlanta Governing Board of the
Office of the Inspector General and the Ethics Office
January 16, 2025, Meeting Minutes**

The meeting of the City of Atlanta Governing Board of the Office of the Inspector General and the Ethics Office was called to order by Chair Nichola Hines at 6:09 p.m.

Attending the meeting were:

- Governing Board members: Nichola Hines (Chair), Todd Gray (Vice Chair), Rebecca Brubaker, Andrew Cohen, Terri Simmons, Richard Taylor, and Cecily Welch;
- OIG staff members: Shannon Manigault (Inspector General), Bradford Garvey (Deputy Inspector General for Independent Procurement Review), Shelby Williams (Deputy Inspector General for Compliance), Roslynn Anderson (Business Manager), and Felecia Henderson (Director of Information and Outreach), and other staff members; and
- Ethics Office staff members: Jabu Sengova (Ethics Officer), Carlos Santiago (Deputy Ethics Officer), Larry Mason (Investigations Manager), Ibadapo Onabanjo (Ethics Advisor), and other staff members.

Board member Lisa Liang was absent.

1. Ms. Brubaker moved to add two items to the agenda: 1. task force recommendations, and 2. elections for chair and vice-chair of the Governing Board. The motion was seconded by Ms. Welch and unanimously approved by the Board.

MINUTES

2. Ms. Welch moved to approve the minutes of the November 21, 2024, board meeting. The motion was seconded by Mr. Taylor and unanimously approved by the Board.
3. Ms. Welch moved to approve the minutes of the November 26, 2024, special-called meeting. The motion was seconded by Ms. Brubaker and unanimously approved by the Board.
4. Dr. Cohen moved to approve the minutes of the December 14, 2024, board retreat. The motion was seconded by Mr. Taylor and unanimously approved by the Board.

ETHICS OFFICER'S REPORT

5. Status Report on Activities to Date

Mr. Mason provided a report on Ethics Office investigations. He reviewed the metrics from the 2024 calendar year and stated that during 2024 the Ethics Office received 193 complaints comprised of 152 Integrity Line Reports and 41 additional complaints. He stated that 48 matters were reported to other departments for further review and 24 report-backs were received. The Ethics

Office opened 21 preliminary reviews of potential ethics matters, closed nine ethics investigations resulting in three final decisions issued where ethics violations were found. Mr. Mason stated that the Ethics Office assessed \$33,095.50 in sanctions and collected \$7,000 in fine payments to date.

Mr. Mason reported on Investigations and Enforcement Actions covering the period 11/15/2024 through 01/09/2025. He stated a total of 28 complaints and reports have been received from all sources since the November board meeting. Mr. Mason stated that the Ethics Office currently has 25 open ethics matters, and he submitted monthly reports on ethics investigations to the Board.

Ms. Onabanjo reported on Ethics advice during the 2024 calendar year. She stated timely ethics advice was provided in 205 requests for written and verbal advice and for general information on ethics. She stated that one informal advisory opinion was issued and that a response was provided to 97 percent of all requests for advice within seven days.

Related to training, Ms. Onabanjo reported that during the 2024 calendar year, the online Ethics training course achieved a 90 percent completion rate by city employees. Ms. Onabanjo stated that the Ethics Office conducted in-person training sessions for various off-site city departments and provided virtual and live ethics training to city officials, employees, board members, vendors, and contractors. She stated that 9,018 total Individuals trained, 8,012 Ethics Acknowledgements or Pledges were received, and the Ethics Office attended 37 Pre-bid conferences hosted by the Department of Procurement.

Regarding public outreach, Ms. Onabanjo stated that Ethics participated in the 2024 Annual Supplier Outreach and Networking Expo Event hosted by the Department of Procurement, sent out city-wide email blasts throughout the year to promote ethics awareness, published three Ethics in Action newsletters, and provided year-round program updates and ethics tips/reminders using the Ethics Office's LinkedIn and Twitter social media accounts.

Ms. Sengova provided an update on programs in the Ethics Office including the audit program automation, the risk assessment program, the redesign of the Ethics Office website, the case management system, and the status of the Standard Operating Procedures documentation. She stated that she and the Deputy Ethics Officer served as panelists at the COGEL conference, and she stated that the 2025 COGEL conference will be held in Atlanta. Ms. Sengova stated that the renovation of the Ethics office space is proceeding.

6. FY25 Budget Report

Ms. Sengova reported that the Ethics Office is currently spending as budgeted for FY25.

INSPECTOR GENERAL'S REPORT

7. Status Report on Activities to Date

Mr. Garvey presented a report on activities to date performed by the Independent

Procurement Review Division. He stated there have been 13 reviews initiated since the last board meeting and the Division has issued 5 reports during this period. He stated there have been 20 submissions reviewed, and 18 observations with an aggregate contract value of \$96 million. In its Report on Activities, OIG provided comparable numbers from the last period and from the same period in the prior year; OIG circulated copies of Independent Procurement Review Reports from the reporting period in advance of the board meeting.

Ms. Williams presented a report on the Compliance Division. She stated there have been 81 complaints received since the last board meeting. Of those, Ms. Williams reported the office has prepared 15 for external referrals to other agencies. She stated the office has 125 active matters. Regarding closed cases, Ms. Williams reported that the OIG has closed three cases since the last meeting. In its Report on Activities, OIG provided comparable numbers from the last period and from the same period in the prior year; OIG circulated documentation of Compliance closed cases from the reporting period in advance of the board meeting.

Ms. Henderson reported that the OIG has conducted two anti-corruption training sessions for 31 employees since the last board meeting and provided comparable numbers from the last period. Ms. Henderson provided a printed outline of all anti-corruption trainings from August 2023 through December 2024 to the Board.

8. FY25 Budget Report

Ms. Anderson reported that the Office of Inspector General is currently spending as budgeted for FY25.

9. Ms. Manigault provided an update on the OIG's infrastructure and provided the Board with a full set of the OIG's updated policies and procedures. Ms. Manigault noted that a handbook containing OIG's public policies and procedures was available on the OIG's website. Ms. Manigault spoke about the status of the case management system for the OIG and a training the vendor is planning on the new system for the office.

Ms. Manigault stated that OIG has been responsive to issues raised during the task force discussions concerning transparency and letting employees know what they may expect when interacting with OIG. Ms. Manigault introduced a discussion regarding ELMS # 37156 / Ordinance # 25-O-1009 and underlying questions about employees' rights. Ms. Manigault commented that there may be a general misunderstanding about the way in which offices of inspector general work, and best practices.

BOARD OPERATIONS

Ms. Hines read for the record a letter written by the Governing Board to the temporary task force for approval.

10. Ms. Brubaker moved to approve the temporary task force's recommendation response letter, as read, without appendix or debate. The motion was seconded by Dr. Cohen.

The Governing Board entered discussions regarding points made in the proposed response letter and invited Ms. Sengova to speak.

Ms. Hines proposed two additional points to include in the recommendation response letter. Ms. Brubaker moved to accept the proposed recommendation response letter with Ms. Hines' additions. The motion was seconded by Mr. Taylor and unanimously approved by the Board.

11. Ms. Simmons moved to re-elect Nichola Hines to the position of Governing Board Chair. The motion was seconded by Ms. Brubaker and unanimously approved by the Board.
12. Ms. Welch moved to elect Rebecca Brubaker to the position of Governing Board Vice-Chair. The motion was seconded by Ms. Welch and was approved by the Board in a vote of six in favor and one against.
13. Ms. Brubaker moved to include a statement that other concerns exist beyond what was addressed in the previously approved letter, regarding Article 8 of the proposed legislation. The motion was seconded by Ms. Welch and approved by the Board in a vote of six in favor and one against.
14. Ms. Simmons moved to include a statement that other concerns exist beyond what was addressed in the previously approved letter, regarding Article 9 of the proposed legislation. The motion was seconded by Ms. Brubaker and approved by the Board in a vote of six in favor and one against.

Having no further business, the meeting adjourned at 8:03 p.m.

Governing Board of the Office of the Inspector General and the Ethics Office