



**CITY OF ATLANTA
OFFICE OF THE INSPECTOR GENERAL**

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September 30, 2024

Doug Shipman, Council President
Michael Julian Bond, Council Member, Post 1 At Large
Matt Westmoreland, Council Member, Post 2 At Large
Jason Winston, Council Member, District 1
Amir Farokhi, Council Member, District 2
Byron Amos, Council Member, District 3
Jason Dozier, Council Member, District 4
Liliana Bakhtiari, Council Member, District 5
Alex Wan, Council Member, District 6
Howard Shook, Council Member, District 7
Mary Norwood, Council Member, District 8
Dustin Hillis, Council Member, District 9
Andrea L. Boone, Council Member, District 10
Marci Collier Overstreet, Council Member, District 11
Antonio Lewis, Council Member, District 12

Dear Council President Shipman and Council Members:

The City of Atlanta Office of the Inspector General (OIG) respectfully requests that the Atlanta City Council (the Council) amend Resolution 24-R-3983 (the resolution)—the legislation introduced and approved on September 3, 2023 creating a temporary task force (the Task Force) to review the processes and procedures of OIG, the Ethics Office, and the Governing Board of the Office of the Inspector General and Ethics Office (the Board)—to, at minimum, extend the deadline for the Task Force to complete its review. As adopted, the resolution requires that the Task Force conduct its review, with no fewer than three public meetings, and make its written recommendations no later than 45 days after the approval of the resolution. No full and fair examination of the issues set forth in the resolution can be completed in the allotted time.

Today is Day 27 of the 45 days. The Task Force held its first public meeting, an organizational meeting, last week on September 24 (Day 21). The second public meeting is scheduled for October 7 from 3pm to 5pm, and the third public meeting is scheduled for October 16 from 3:30pm to 5:30pm. The Task Force recommendations would be due by October 18.

During the first meeting, one member of the Task Force noted that it was not possible for the Task Force to get all of its work done in the official meetings. A Neighborhood Planning Unit

(NPU) chair and member of the Atlanta Planning Advisory Board (APAB) who offered public comment regarding the timeline of the Task Force, among other concerns, noted that the issues to be addressed were of too great import to rush.

Based on the above details for the remaining scheduled meetings, the Task Force would have only four hours in which to hear testimony and publicly engage with interested parties. To date, the background materials provided by staff to the Task Force (the City Attorney/Mayor's Office) focus solely on concerns presented by the Mayor's Office and include none of those raised by OIG or the Board, as noted during the first Task Force meeting by one Task Force member and multiple public commenters. Exploration of these issues alone by just OIG, the Board, and the Ethics Office would almost certainly take more than four hours. (Note that the Chief of Staff and the City Attorney took more than an hour and fifteen minutes to discuss the concerns of the Mayor's Office during the September 19, 2024 meeting of the Board.) If the Task Force is also to examine concerns of OIG, including the need for reform to address the issues OIG raised with Council earlier this year surrounding OIG's independence and obstruction of OIG investigations, the Task Force will need more time.

A comprehensive examination of the processes and procedures of OIG requires input from not only the impacted City offices, but also from subject matter experts and the public. The Board has repeatedly asked the Mayor's Office to ensure that any discussion of potential reform surrounding OIG be informed by industry standards and best practices, with input from subject matter experts in the work of offices of inspector general. (1) The Association of Inspectors General, a 501(c)(3) organization that works to advance integrity and accountability in government through independent oversight, has offered its assistance to the Task Force. (2) Current and former inspectors general from other jurisdictions and those who have studied offices of inspector general have expressed interest in providing testimony to the Task Force.

The public has also expressed interest in providing feedback to the Task Force. Last week, APAB, on behalf of members of NPUs across the City, issued an advisory statement with a number of requests pertaining to the Task Force, including allowance for public comment: "Allowing citizen input on public proceedings is an essential component of creating and maintaining public trust and is vital to staying aligned with best procedures and protocols for transparency." (3) While no public comment period was included in the published agenda for the first meeting of the Task Force, five members of the public who attended offered comment. More members of the public will want to weigh in on the Task Force's work, potentially exceeding the 30-minute limit placed on the public comment period during the first meeting.

Atlanta is not the first jurisdiction to grapple with questions regarding offices of inspector general, including those that arise in connection with new offices of inspector general. Recently, Baltimore County, which created its office of inspector general in 2019, empaneled the Blue Ribbon Commission on Ethics and Accountability to "perform a comprehensive review and evaluation" of the legislation governing the Baltimore County Office of the Inspector General and to develop recommendations "in accordance with best practices for review by the County Executive and the County Council." That body held ten public meetings over a period of eight months, from June 2022 through February 2023. (4)

If the Council seeks to develop any prospective reform of OIG operations “thoughtfully, lawfully and with expert and independent input,” the task force it created must be afforded sufficient time and resources to perform its review. The Task Force cannot fulfill its duties under the timeline established in the resolution. OIG received no notice regarding the resolution before it was introduced and approved by Council, and so did not have the opportunity to raise these (or other) concerns before the Task Force was formed. OIG now asks that the Council amend the deadline for Task Force recommendations by no fewer than three months to allow time for a full and fair examination of OIG operations and the challenges the office has faced as it has sought to advance integrity in City operations by preventing and detecting fraud, waste, abuse, and corruption. An extended deadline would also allow the Task Force greater latitude to schedule its meetings during times and in City facilities that would foster transparency and public engagement, with live streaming of proceedings. OIG requests that the Council consider the additional Task Force reform measures requested in the APAB advisory statement. Finally, OIG requests that future Task Force meetings accommodate remote testimony from experts.

Thank you for your consideration. Please let me know if you have any questions.

Sincerely,



Shannon K. Manigault
Inspector General

cc: Leah Ward Sears, Chair, Task Force
Norman Brothers, Member, Task Force
Richard Deane, Member, Task Force
David Dove, Member, Task Force
Tanya Miller, Member, Task Force
Nichola Hines, Chair, Board
Todd A. Gray, Vice Chair, Board
Rebecca F.M. Brubaker, Member, Board
Andrew I. Cohen, Member, Board
Natalie S. Lewis, Member, Board
Lisa K. Liang, Member, Board
Terri R. Simmons, Member, Board
E. Richard Taylor, Member, Board
Cecily V.M. Welch, Member, Board
Jabu M. Sengova, Ethics Officer
Odie Donald, Chief of Staff
Patrise Perkins-Hooker, City Attorney