

To: The Task Force for Review of the Processes and Procedures of the Office of the Inspector General, the Ethics Office and the Governing Board of the Office of the Inspector General and the Ethics Office

From: Amy L. Kurland, Esquire, Former Inspector General for the City of Philadelphia

Thank you for allowing me the opportunity to address procedures and operations that contribute to an effective Office of Inspector General and to the public trust in city government.

In 2019 the Task Force for the Promotion of Public Trust was formed by Atlanta public officials in 2019 to examine ways to strengthen Atlanta's ethical environment. The Task Force considered integrity models from across the country. As the former Inspector General for the City of Philadelphia, I testified before the Task Force as a subject-matter expert.

Philadelphia had faced similar ethical challenges as Atlanta with the series of convictions of city officials, and a pay to play scheme that reached into the Mayor's office. Mayor Michael Nutter was elected on the platform of restoring honesty and integrity to city government and he appointed me to lead a new Office of the Inspector General to root out fraud, corruption and misconduct. Established under Executive Order, the Philadelphia OIG is structured with the powers, duties and obligations of statutorily enacted OIGs and other Executive Branch OIGs throughout the country.

I served as Philadelphia's Inspector General for 12 years under 2 mayors and saw enormous positive changes in the city. More city employees reported misconduct. On increasingly rare occasions when indictments were returned, the Mayor and I stood together with law enforcement officials and condemned the few individuals who tarnished the reputations of our honest workforce and stated that we would not tolerate misconduct in our city. Our investigations of contractor overbilling, and fraud and non-profit fraud brought millions of dollars back to the city and to our most vulnerable citizens. Citizens began to have more confidence in city government understanding that we were policing ourselves.

Several factors have contributed to Philadelphia's success and are essential to the success of any OIG. For an OIG to succeed, its practices must fit with the national standards. Those national standards are set for the in the Association of Inspectors General's *Principles and Standards for Offices of Inspector General, Quality Standards for Investigations*.

- Broad jurisdiction to seek out fraud, waste and abuse or corruption.
- Investigative powers including subpoena power, access to all city property, records, and employees, the affirmative requirement to report wrongdoing, cooperation and whistleblower protection.
- Accountability features such as dual reporting. For example, the Philadelphia IG must report to the mayor's office and to city council as part of budget proceedings.
- Independence and the with the ability to initiate investigations.
- Confidentiality to protect city employees from unfounded allegations and reputational harm and to ensure the integrity of investigations.

I was honored to participate in the Task Force for the Promotion of Public Trust and gratified by the report's belief that "the Inspector General model is the best practice and would be the most successful model in Atlanta to root out fraud, waste, abuse, corruption and misconduct." I was certain that with an

OIG held to national standards and supported by Atlanta's leadership Atlanta would see similar success as Philadelphia.

In Philadelphia, the public sees that through a well-supported OIG the city can police itself rather than wait for indictments of its officials. The public gains confidence in city government and government functions more efficiently, transparently and honestly. And when government leaders support an independent OIG they set an ethical tone of leadership at the top, strengthening the public trust in government.