

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: Rose Gill, Former Commissioner, New York City Dept. of Investigation (DOI)

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I respectfully submit this brief statement about the importance of an independent public integrity office, e.g. an Inspector General's Office, in any municipality. This information I hope provides some context from the perspective of another city as it relates to municipal integrity oversight and enforcement structures. By way of introduction, I served as the Commissioner of investigation for the City of New York for 12 years. NYC's DOI is the oldest established anti-corruption agency and the largest municipal integrity office of its kind in the country. I have been extensively involved with the IG community in the US and in cities abroad for over two decades, and I have helped other cities to establish and/or develop their public integrity offices, including Inspector General offices. Indeed, in 2019, I had the pleasure of working with the City of Atlanta's *Task Force for the Promotion of Public Trust*, and had the deep honor of meeting and engaging with Justice Leah Ward Sears, Chair of that Task Force. In that capacity, I worked with the Task Force that spent 5 months receiving and conducting research, held 5 public hearings, and took presentations from 10 subject matter experts – all regarding other city public integrity practices and models. I assisted in the preparation of the Final Report issued by the Task Force. As the Report indicated, a number of prior corruption cases were part of the catalyst for the extensive study undertaken by the Task Force, which led ultimately to the formation of the City's Inspector General's Office.

This memorandum is confined to my experience in New York City as Investigation Commissioner, (which in essence is the Inspector General for NYC government), and to knowing the circumstances of many of my city IG counterparts with whom I consulted regularly. The role of an anti-corruption office, of an IG, is among the most important in any city. An IG (or equivalent) protects taxpayer dollars, helps insure the transparent and equitable operation of city government and provision of services to residents, and strengthens public trust and confidence in government. The public demands it to be so, and the media closely follows the efforts and activities of DOI and other IG Offices.

DOI emphasizes corruption prevention, continually conducting training sessions about ethics rules and conflicts of interest laws. DOI also proactively examines and audits for potential corruption vulnerabilities or waste in city operations; and conducts investigations where there is information about fraud, corruption or wrongdoing. DOI and other IG offices protect whistleblowers who come forward to report wrongdoing. DOI issues policy and procedure recommendations to address corruption vulnerabilities discovered. During my tenure, over 2,000 were implemented that fixed gaps or problems in city processes and operations.

To carry out that mandate effectively, like many IG offices, DOI is imbued with statutory independence and powers to investigate, including the ability to conduct those investigations confidentially. DOI often works closely with other law enforcement agencies and prosecutor's offices. The jurisdiction of DOI is broad, intended to permit the investigations to move forward "without fear or favor." DOI has subpoena power and the right to access city books and records. DOI must conduct itself fairly, reasonably, and legally. It seeks investigative tools and process through the legal channels of prosecutor's offices when needed.

This non-exhaustive list of features are certainly among the hallmarks of DOI, and that of many IG offices, that have made DOI the potent and successful watchdog agency it is deservedly known to be, emulated by other cities that have a genuine goal of maintaining honesty and integrity in city government. The nature of a new IG office is such that there will be a need for a period of adaptation; lessons learned about protocols. A city that has taken the significant step of establishing a new IG office should endeavor to move forward with all stakeholders involved for the public benefit.