

**SUBJECT:** 

**Terminology** 

**SECTION:** 

1-1

**PURPOSE:** 

The purpose of this section is to define the terms, phrases, and abbreviations

referenced throughout this manual.

**SCOPE:** 

This section applies to all OIG staff.

## **POLICIES & PROCEDURES:**

The following words, terms, and phrases, when used in this manual, shall have the meanings ascribed to them in this section, except where the context clearly indicates a different meaning:

#### A. DEFINITIONS

Access to records and property means the immediate allowance for the Office of the Inspector General to obtain or retrieve any and all City of Atlanta records and property in the custody of its departments and divisions, including but not limited to books, records, documents, automated data, personnel, processes and other information pertaining to the business of the city.

Article 8 means eighth article of Subpart A of Part 1 of the Code of Ordinances for the City of Atlanta, the section of the Charter of the City of Atlanta that establishes the Office of the Inspector General and outlines its jurisdiction, duties, and authority, and those of its governing board.

Assistant Inspector General means the individual who reports directly to the Deputy Inspector General and is tasked with day-to-day supervision of reviews and/or investigations within a division of the Office of the Inspector General.

Association of Inspectors General means the non-profit, membership organization for agencies and professionals in the inspector general community, which was established in 1996 to foster and promote public accountability and integrity in the prevention, investigation, audit, and detection of fraud, waste, and abuse through standardization of practices, policies, and ethics, providing and sponsoring educational programs, and the establishment of professional qualifications, certification, and licensing.

Atlanta City Council means the legislative body of the City of Atlanta, comprised of 15 city council members and led by the council president.

*Board* means the Governing Board of the Office of the Inspector General and the Ethics Office.

*Chair* means the chair of the Governing Board of the Office of the Inspector General and Ethics Office.

Charter means the section of the City of Atlanta Code of Ordinances that establishes the government structure of the City and defines boundaries, specific powers, functions, essential procedures, and legal control.

City Council means Atlanta City Council.

City Council Member means one of the 15 representatives elected to represent citizens that reside in the City of Atlanta.

City of Atlanta means the municipal corporation of the State of Georgia in which the Office of the Inspector General has jurisdiction.

City of Atlanta Office of the Inspector General means the office of inspector general established by the City of Atlanta pursuant to Article 8 of the Charter.

*Complainant* means a person or entity that files a complaint or request for investigation with the Office of the Inspector General.

Complaint means a statement received from a complainant alleging misconduct.

Compliance Division means the unit within the Office of the Inspector General responsible for conducting investigations, providing anti-corruption training, and identifying and making recommendations to address corruption vulnerabilities.

Deputy Inspector General means the individual who reports directly to the Inspector General and is tasked with the day-to-day oversight and management of a division within the Office of the Inspector General.

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

Governing Board of the Office of the Inspector General and Ethics Office means the 9-member body appointed to ensure the independence of the Office of the Inspector General, who have residency, employment, or business interests within the City of Atlanta, and who are nominated by local civic, professional, and educational associations and institutions.

Green Book means the Principles and Standards for Offices of Inspector General.

*Independence/Independent* means free from political and external influence or control.

Independent Procurement Review Division means the unit within the Office of the Inspector General responsible for reviewing all City solicitations with an aggregate value of \$1 million or more, conducting discretionary reviews, and identifying and reporting areas of concern.

*Independent Procurement Review* means a review and testing of records to identify areas of concern within a city solicitation.

*Inspector General* means the individual responsible for the overall management of the Office of the Inspector General and the direction of its two divisions.

Office means the City of Atlanta Office of the Inspector General.

Office of the Inspector General means City of Atlanta Office of the Inspector General.

Principles and Standards for Offices of Inspector General means the compendium of generally accepted professional principles and quality standards established by the Association of Inspectors General by which the Office of the Inspector General is guided in conducting its duties.

#### B. ACRONYMS/ABBREVIATIONS

AIG – Assistant Inspector General or Association of Inspectors General

COA – City of Atlanta

DIG - Deputy Inspector General

IG – Inspector General

IPro - Independent Procurement Review Division

IPRO – Independent Procurement Review Officer

OIG - Office of the Inspector General

The terminology in this section may be amended as changes occur within the office.

APPROVED BY:



**SUBJECT:** 

Authority of the Office of the Inspector General

**SECTION:** 

1-2

**PURPOSE:** 

The purpose of this section is to state the legal authority for the Office of the Inspector General (OIG) and the authority vested in the Inspector

General.

**SCOPE:** 

This section applies to all OIG staff.

OIG's enabling authority is codified in Article 8 of the Charter of the City of Atlanta, as may be amended. Article 8 of the Charter establishes the functions, powers, and authority of OIG and the Inspector General, and provides that:

- 1. The Inspector General is the head of OIG. The organization and administration of OIG will be sufficiently independent to assure that no interference or influence external to the office adversely affects the independence and objectivity of OIG.
- 2. To ensure the independence of OIG, the Inspector General does not report directly to an agency head. The Inspector General reports directly to the Governing Board of the Office of the Inspector General and the Ethics Office. The Inspector General must provide an annual report to the Governing Board, the Mayor, and the Atlanta City Council.
- 3. The Inspector General has, subject to budgetary allocation by the Atlanta City Council, the power to appoint, employ, and remove such assistants, employees, and personnel and establish personnel procedures as deemed necessary for the efficient and effective administration of activities of OIG.

Additional provisions of the Charter and legislation of the Atlanta City Council, as enacted and amended, provide ancillary authorization and jurisdiction for other activities of OIG.

APPROVED BY:



**SUBJECT:** 

**Mission Statement** 

**SECTION:** 

1-3

**PURPOSE:** 

The purpose of this section is to establish a Mission Statement and to ensure

that the Mission Statement is clearly communicated to all staff of OIG.

**SCOPE:** 

This section applies to all OIG staff.

### **POLICIES & PROCEDURES:**

- A. OIG will have a written Mission Statement, which clearly and concisely articulates the values and goals of the OIG. This policy is to ensure that all OIG staff members are aware of the mission of the office.
- B. The Mission Statement will be displayed in all OIG offices. The Mission Statement will also be posted on the OIG website.
- C. All OIG employees will be required to read the Mission Statement and sign a Mission Statement Receipt as an acknowledgement of their understanding of their responsibility to promote the mission and goals of the Office. The original signed Mission Statement Receipt will be maintained in the employee's OIG personnel file. The employee will be provided a copy of the signed receipt.
- D. The Mission Statement may be modified as OIG needs arise.
- E. The OIG Mission Statement and Mission Statement Receipt are incorporated herein as Appendix A1-3.1 – Mission Statement and A1-3.2 – Mission Statement Receipt.

APPROVED BY:

Shannon K. Manigault

Inspector General



**SUBJECT:** 

**Organizational Chart** 

**SECTION:** 

1-4

**PURPOSE:** 

The purpose of this section is to establish procedures for the distribution of an Organizational Chart, which shows the components, functions, and

reporting structure of OIG.

**SCOPE:** 

This section applies to all OIG staff.

### **POLICIES & PROCEDURES:**

- A. OIG will have an organizational chart that clearly depicts the components, titles, and reporting structure of the office.
- B. OIG's organizational chart will be displayed in all OIG offices.
- C. All OIG employees will be required to read the organizational chart and sign an Organizational Chart Receipt as an acknowledgement of their understanding of the organizational structure and reporting requirements set forth in OIG's organizational chart. The original signed Organizational Chart Receipt will be maintained in the employee's OIG personnel file. The employee will be provided a copy of the signed receipt.
- D. OIG's organizational chart will be updated as changes occur.
- E. The OIG organizational chart and Organizational Chart Receipt are incorporated herein as Appendix A1-4.1 – Organizational Chart and Appendix A1-4.2 – Organizational Chart Receipt.

APPROVED BY:

Shannon K. Manigault

Inspector General



**SUBJECT:** Standards of Conduct for All OIG Employees

SECTION: 1-5

**PURPOSE:** The purpose of this section is to establish the standards of conduct by which

all OIG employees will abide.

**SCOPE:** This section applies to all OIG staff.

## **POLICIES & PROCEDURES:**

A. All OIG employees are expected to maintain the highest level of ethical conduct and standards.

- B. All OIG employees are required to abide by Section 2-801 of the City of Atlanta Code of Ordinance, *Standards of Conduct*, and any other applicable City of Atlanta ordinances and resolutions as may be amended or enacted.
- C. OIG is guided by the tenets set forth in the *Principles and Standards for Offices of Inspector General*, also known as "the Green Book," established by the Association of Inspectors General. All OIG employees are expected read and understand these principles and standards.
- D. In addition, OIG has its own written Standards of Conduct, which includes underlying principles of the Code and the Green Book, and also includes values specific to the nature of the work conducted by OIG.
- E. During their initial orientation, all OIG employees will be provided with a copy of the *Principles and Standards for Offices of Inspector General*. All OIG employees will be required to sign a *Principles and Standards for Offices of Inspector General Receipt* as an acknowledgement that they understand and will be guided by the Green Book principles and standards.
- F. During their initial orientation and by January 31st of each subsequent year, all OIG employees will be provided with a copy of the OIG Standards of Conduct, Annual Statement of Understanding and Responsibility Form. All OIG employees will be required to sign an OIG Standards of Conduct, Annual Statement of Understanding and Responsibility Form as an acknowledgement that they understand and will abide by the requirements of the OIG Standards of Conduct.

- G. The original signed *Principles and Standards for Offices of Inspector General Receipt* and the *OIG Standards of Conduct, Annual Statement of Understanding and Responsibility Form* will be maintained in the employee's OIG personnel file. The employee will be provided a copy of the signed forms.
- H. The Principles and Standards for Offices of Inspector General Receipt, OIG Standards of Conduct and the OIG Standards of Conduct, Annual Statement of Understanding and Responsibility Form are incorporated herein as Appendix A1-5.1 Principles and Standards for Offices of Inspector General, and Appendix A1-5.2 OIG Standards of Conduct, Annual Statement of Understanding and Responsibility.



**SUBJECT:** 

**Independence from Impairments** 

**SECTION:** 

1-6

**PURPOSE:** 

The purpose of this section is to establish the procedures for maintaining

the independence of the OIG and OIG staff.

**SCOPE:** 

This section applies to all OIG staff.

## **POLICIES & PROCEDURES:**

A. OIG Policy Regarding Independence from Impairments

- 1. The City of Atlanta Office of the Inspector General must remain neutral and independent at all times. The IG and OIG staff involved in performing or supervising any assignment must be free from personal and external impairments and should ensure that there are no organizational impairments to independence.
- 2. Maintaining independence from impairments is essential to ensure that OIG's findings, conclusions, and recommendations are impartial and are viewed by others as impartial.
- 3. OIG staff will ensure that all impairments to independence are properly reported and resolved in accordance with Section C herein.
- 4. On an annual basis, each OIG employee, including the Inspector General, will complete an *Independence from Impairments Attestation Form* in accordance with Section D herein.

## B. Impairments Affecting Independence

- 1. Personal Impairments: Circumstances may arise where the Inspector General and/or a member of OIG staff cannot be impartial due to personal situations that may create actual or perceived conflicts of interest. Such personal impairments may include, but are not limited to:
  - a. Official, professional, personal, or financial relationships with any person or entity under investigation, audit, inspection or review, which may appear to

- affect the OIG staff member by changing, limiting, or altering the scope or the outcome of the work.
- b. Preconceived ideas or biases towards activities, individuals, groups, organizations, objectives, or particular programs that could affect or may be perceived as affecting the objectivity of the OIG staff and the outcome of the work.
- c. Previous involvement, whether as staff, managerial or in a decision-making capacity, regarding the current subject of an investigation, audit, inspection or review, that could or may be perceived as affecting the objectivity or the outcome of OIG's work.
- 2. External Impairments: The OIG must be insulated from external impairments that could restrict or interfere with its ability to form independent and objective opinions or conclusions. Such external impairments may include, but are not limited to:
  - a. Interference or undue influence in the selection, appointment, and employment of the Inspector General or OIG staff.
  - b. Interference or undue influence with the OIG budget.
  - c. Limiting or interfering with access to evidence, documents, records or individuals necessary to conduct the investigation, audit, inspection, or review.
  - d. Improper political pressure intended to influence the selection of or the performance of an investigation, audit, inspection, or review or the reporting of findings.

# 3. Organizational Impairments

- a. OIG was created as an independent entity responsible for detecting fraud, waste, abuse, corruption, and misconduct without political influence.
- b. OIG should be insulated from any interference or influence by any individual or department within City of Atlanta government that might affect the independence and impartiality of the office.
- c. If the Inspector General determines that an organizational impairment exists, which affects or may be perceived to affect the ability of the office to conduct its work in a professional, competent and objective manner, the Inspector General may decline to perform the work. If the Inspector General performs the work, the nature of the impairment shall be disclosed in any resulting report along with any potential impact the impairment might have on the report's conclusions.

# C. Reporting Requirements if an Impairment Occurs

- 1. If an impairment occurs during the year, the affected staff member will be required to disclose the actual or potential impairment to his/her immediate supervisor. The affected staff member will complete and sign an *Impairment Notification Form* detailing the impairment.
- 2. The supervisor will give the completed *Impairment Notification Form* to his/her superior(s), who will then report the impairment through the organizational hierarchy until it reaches the Inspector General.
- 3. If the Inspector General determines that there exists an actual or potential impairment, which may affect the performance or the outcome of the work, then the Inspector General through the Deputy Inspector General will reassign the work and remove the affected employee from such assignment. The investigation, audit, inspection, or review will continue without the participation of the affected employee.
- 4. The original signed *Impairment Notification Form* will be maintained in the employee's OIG personnel file. A copy of the completed and signed form will be made part of the affected work assignment's permanent case file. A copy will be provided to the employee.
- 5. Failure to disclose an actual or potential conflict of interest may subject the OIG staff member to disciplinary action up to and including termination.
- 6. The *Impairment Notification Form* is incorporated herein as Appendix A1-6.2.
- 7. Consistent with the procedures established herein, supervisors will report impairments to his/her superior(s), who will then report the impairment through the organizational hierarchy until it reaches the Inspector General. Should the Inspector General have an impairment, the Inspector General will notify the Deputy Inspector General for the appropriate division and the Chair of the Governing Board of the Office of the Inspector General and Ethics Office of the impairment. The Deputy Inspector General, with notice to the Chair, will decide on the course of action to take, including whether to continue with said assignment without or with the limited participation of the Inspector General or whether to refer said assignment to another agency. Impairments will be reported on the same form (see Appendix A1-6.2).

## D. Annual Attestation Requirement

- 1. By January 31<sup>st</sup> of each year, all OIG staff members will be required to sign an *Independence from Impairments Attestation Form* as a confirmation of their independence from personal, organizational, and external impairment.
- 2. The original signed *Independence from Impairments Attestation Form* will be maintained in each employee's OIG personnel file. A copy will be provided to the employee.

- 3. New OIG employees will be required to sign an *Independence from Impairments Attestation Form* during their initial orientation.
- 4. The *Independence from Impairments Attestation Form* is incorporated herein as Appendix A1-6.1 Independence from Impairments Attestation.



**SUBJECT:** 

**Employee Confidentiality** 

**SECTION:** 

1-7

**PURPOSE:** 

The purpose of this section is to establish OIG's policy of employee

confidentiality.

SCOPE:

This section applies to all OIG staff.

## **POLICIES & PROCEDURES:**

## A. Employee Confidentiality Standards

- 1. Maintaining the confidentiality of information is of paramount importance to the OIG. It is the cornerstone to conducting fair, impartial and effective reviews and investigations. It is essential in maintaining the integrity of the OIG and its operations. The public, governmental officials, and other criminal justice and law enforcement agencies have an expectation that information received by the Office of the Inspector General will be treated in a professional and confidential manner.
- 2. OIG conducts reviews and investigates allegations that may result in a finding that no wrongdoing was committed. As such, it is imperative that no information be revealed prematurely that may reflect erroneously on a person or entity and cause that person or entity undue and unnecessary harm to their reputations and integrity.
- 3. Any information pertaining to OIG activities, including but not limited to investigations, audits, inspections, litigation, administrative actions or other work, is not to be disclosed or discussed with anyone external to the OIG, unless such disclosure is unavoidable or necessary during the course of OIG work assignments.
- 4. Disclosure of any records pertaining to OIG work will be as required by law and/or at the discretion of the Inspector General, wherein he/she will determine if such disclosure is in the best interests of OIG.

# B. Confidentiality Agreement

- 1. To ensure that all OIG staff members are aware of the confidentiality requirements of OIG, they are required to execute an *Employee Confidentiality Agreement*.
- 2. The original copy of the signed Employee Confidentiality Agreement will be maintained in the employee's OIG personnel file. The employee will be provided with a copy of the signed form.
- 3. The OIG's confidentiality standards are restated in the *Employee Confidentiality Agreement*, which is incorporated herein as Appendix A1-7.1.

APPROVED BY:

**SUBJECT:** Teleworking

SECTION: 1-8

**PURPOSE:** The purpose of this section is to establish OIG's protocols for teleworking.

**SCOPE:** This section applies to all OIG staff.

# **POLICIES & PROCEDURES:**

# A. OIG Policy Regarding Teleworking

- 1. This policy defines OIG's expectations and requirements related to conducting OIG business remotely, using COA resources and assets outside of the City's facilities.
- 2. OIG employees will report to the office Monday through Friday according to their established work schedules.
- 3. Teleworking is not an employee benefit, but rather an alternative for continuity of OIG business to meet the needs of the office.
- 4. OIG employees engaged in teleworking must be available via telephone, email, and video conference to discuss work progress and any issues. The basis for teleworking must be agreed upon by the employee and their supervisor. To the extent that there are times during the established telework schedule that the employee will not be available, the employee must communicate those times to the supervisor in advance or as soon as possible.
- 5. In the telework environment, OIG employees must comply with all OIG policies and procedures, all City policies, and all federal, state, and local laws.

# B. Requests to Telework

- 1. All requests to telework will be considered on a case-by-case basis and require prior approval from the supervisor before the employee can telework.
- 2. Employees must submit requests to telework to their immediate supervisor via email, copying the IG on the request.

- 3. The supervisor will respond to the email with the determination, copying the IG on the response.
- 4. Once approved, the employee must enter the information onto the OIG Shared Calendar as outlined in Section 1-10 of this manual.
- 5. Non-compliance with any aspect of this policy will result in disciplinary action, up to and including dismissal from the office.

**SUBJECT:** Healthy Work Environment

SECTION: 1-9

**PURPOSE:** The purpose of this section is to establish OIG's policy to promote a positive

and healthy work environment.

**SCOPE:** This section applies to all OIG staff.

# **POLICIES & PROCEDURES:**

OIG employees are entitled to work in an environment where they are treated with dignity and respect. OIG promotes a positive office culture that is fair and equitable; that provides support and encouragement; that is free from bullying and hostility; and that emphasizes health, safety, and wellness. OIG is committed to ensuring that no employee is subject to bullying, discrimination, harassment, or violence from management, co-workers, and vendors.

This policy defines OIG's expectations and requirements related to promoting and maintaining a positive and healthy work environment.

OIG will not tolerate bullying, discrimination, harassment, or violence by or against its employees.

## A. Definitions

*Bullying* means repeated mistreatment by one or more employees of an employee. It is abusive conduct that takes the form of one or more of the following: verbal abuse; behaviors perceived as threatening, intimidating, or humiliating; and work sabotage.

Discrimination means unfair or improper behavior, whether intentional or not, that is directed toward one or more employees based on race, sex, gender, gender identity, sexual orientation, ancestry, place of origin, citizenship, age, marital status, or physical or mental handicap. The behavior may affect working conditions or employment decisions such as hiring, promotion, training, benefits, or termination of employment.

Harassment means improper behavior, whether intentional or not, that involves a course of conduct or pattern that includes more than one incident. However, one incident, if sufficiently serious, can constitute harassment. Sexual harassment involves the unwanted behavior of a sexual nature that intimidates or causes another

person offense or humiliation. It is specifically related to gender or sexual orientation, and can be directed at people of the same gender and sexual orientation, or those of another gender and sexual orientation.

Violence in the workplace means any intentional attempted or actual exercise of any physical force that causes or may cause physical injury; or intimidating or threatening behavior that gives a person reasonable grounds to believe he/she is at risk of physical injury.

# B. Reporting

- 1. If you experience, witness, or become aware of bullying, discrimination, harassment, or violence in the workplace, immediately report it to your supervisor. Be specific about the exact behavior identified and where possible record the date, time, and details of the conduct including any witnesses to the conduct. In cases of serious violence, call the police or dial 911.
- 2. If your supervisor does not respond or your supervisor is the subject of your complaint, immediately report to the next level of supervision or contact Human Resources as soon as possible so that Human Resources can provide support and assistance to resolve the situation.
- 3. Supervisors or managers who receive a complaint or become aware of a violation of this policy are required to immediately notify Human Resources, so that Human Resources can provide the appropriate support and guidance.
- 4. The supervisor will follow up with the employee and advise him/her of the action taken both verbally and in writing.

# C. Disciplinary Action

- 1. Every individual has a responsibility to help promote a positive work environment. This means not engaging in, allowing, condoning, or ignoring behavior that violates this policy.
- 2. Every individual is responsible for his/her own behavior. Supervisors have an additional obligation to oversee and correct behavior of other employees by setting a good example and taking positive or corrective action whenever they become aware of any potential breach of this policy.
- 3. OIG will take appropriate disciplinary, remedial, and where necessary, legal action against any employee responsible for violating this policy.
- 4. Non-compliance with any aspect of this policy will result in disciplinary action, up to and including dismissal from the office.

# D. Acknowledgement

- 1. All OIG employees will be required to sign a *Healthy Work Environment Receipt* as an acknowledgement of their understanding of their responsibility to promote a healthy and positive work environment. The original signed *Healthy Work Environment Receipt* will be maintained in the employee's OIG personnel file. The employee will be provided a copy of the signed receipt.
- 2. The *Healthy Work Environment Receipt* is incorporated herein as Appendix 1-9 Healthy Work Environment Receipt.

APPROVED BY:

### POLICIES AND PROCEDURES MANUAL

**SUBJECT:** Shared Calendars

**<u>SECTION:</u>** 1-10

**PURPOSE:** The purpose of this section is to establish OIG's protocols for the use of

the OIG Shared Calendars.

**SCOPE:** This section applies to all OIG staff.

# **POLICIES AND PROCEDURES:**

This policy designates the Microsoft Outlook Shared Calendar as the official office tool to track staff absences from the office and to reserve conference rooms.

- A. It shall be each OIG employee's responsibility to ensure that all absences and/or leave is recorded on the *Inspector General Team Shared Calendar*. This includes, but is not limited to:
  - Annual leave
  - Sick leave
  - Medical leave
  - Teleworking
  - Jury duty
  - Any time away from the office for OIG business and/or personal matters during the work day
  - 1. Employees shall enter their initials and indicate the nature of the absence/meeting.
  - 2. If multiple employees will be out of the office or occupied with the same meeting/event, employees shall coordinate to submit one entry with the initials of the multiple participants.
  - 3. Entries shall indicate the approximate time out of the office. The "all day" feature should only be used when the employee will be out of the office or occupied all day.
- B. It shall be each OIG employee's responsibility to ensure that all meetings and appointments are listed on the OIG Conference Large Conference Room, OIG Small Conference Room, or the OIG Interview Room shared calendars. This includes, but is not limited to:

- Interviews
- Complaint intakes
- Staff meetings
- Case discussions
- 1. The meeting organizer shall enter his/her initials and a brief summary of the room usage.
- C. All absences, authorized leave, and/or meetings should be added to the calendar as soon as possible, but no later than 24 hours before the anticipated activity.
- D. If the employee is unable to enter the information onto the respective shared calendar, the employee should notify his/her immediate supervisor and request that the supervisor add the activity to the shared calendar.
- E. Failure to comply with this policy may result in disciplinary action.



## POLICIES AND PROCEDURES MANUAL

**SUBJECT:** Dress Code

SECTION: 1-11

**PURPOSE:** The purpose of this section is to establish OIG's dress code.

**SCOPE:** This section applies to all OIG staff.

# **POLICIES AND PROCEDURES:**

A. The official dress code for OIG staff when working in the office is business casual.

- B. The official dress code for OIG staff for meetings or special events, whether in or outside of the office, is business professional.
- C. The official dress code for Fridays, when there are no scheduled meetings or special events, is casual.
- D. All OIG employees must keep business professional attire (i.e., a suit, shirt/blouse, and appropriate shoes) in the office at all times for unscheduled or emergency meetings that may arise. Compliance Division staff are expected to keep casual attire in the office at all times for any field activities that may arise.
- E. All attire should be clean and in good condition.
- F. No employee shall wear attire with offensive or inappropriate drawings or messaging, revealing attire, or attire otherwise deemed inappropriate. If any inappropriate attire is observed or brought to management's attention, the employee will be asked to change the attire.
- G. Failure to comply with this policy may result in disciplinary action.

APPROVED BY:

## POLICIES AND PROCEDURES MANUAL

**SUBJECT:** Attendance

**<u>SECTION:</u>** 1-12

**PURPOSE:** The purpose of this section is to provide guidance regarding handling

employee attendance to ensure organizational efficiency and ensure that employees report to work to support the critical needs of the office.

employees report to work to support the critical needs of t

**SCOPE:** This section applies to all OIG staff.

# **POLICIES AND PROCEDURES:**

### A. ATTENDANCE EXPECTATIONS

- 1. Punctual and regular attendance is an essential responsibility of each employee. Tardiness, early departure, and other unscheduled absences from work are disruptive and should be minimized.
- 2. Employees are expected to remain at work for their entire work schedule and are expected to return from scheduled breaks on time.
- 3. Employees must take earned leave (e.g., accrued leave or compensatory time) for every absence unless otherwise allowed by City policy (e.g., jury duty).
- 4. Excessive tardiness and absenteeism will be addressed through progressive disciplinary action, up to and including dismissal.
- 5. Employees are expected to report to work as scheduled, on time and prepared to start working. If an employee cannot report to work as scheduled, they must notify their supervisor using the process established by OIG. Employee shall note that notification does not excuse tardiness or absence but allows the supervisor time to make necessary adjustments to ensure coverage for the office if needed.
- 6. The notification process shall consist of direct communication, texting, and/or email no later than the regular starting time of the employee's work day.

## **B. NOTIFICATION**

An employee seeking to utilize leave must first determine if he/she has sufficient accrued paid time off (PTO) to cover the absence.

- 1. Proper Notice for a Scheduled Absence Absent extenuating circumstances, an employee must provide notice to his/her supervisor, at least 48 hours in advance of a scheduled absence. The employee's supervisor must approve the request in advance of the absence.
- 2. Proper Notice for an Unscheduled Absence In the event an employee needs to be absent or late for work due to an unforeseen event, (i.e., illness or an emergency), if physically able, the employee must notify his/her supervisor within one hour after the start of employee's scheduled start time on that same day. This notification should come directly from the employee or at the employee's direction.
  - a. If it is necessary for an employee to leave work for an unforeseen event such as an illness or an emergency, the employee must notify his/her supervisor immediately.
  - b. Within 48 hours of returning to work, the employee must enter a leave request in Oracle.
- 3. Employees must enter their absence/leave on the *Inspector General Team Shared Calendar* in accordance with Section 1-10 of this Manual.
- 4. If the employee is not able to enter the information on the *Inspector General Team Shared Calendar*, his/her immediate supervisor should enter the information on the calendar. Employees are expected to check the *Inspector General Team Shared Calendar* to ensure that all absences and leave are properly recorded pursuant to Section 1-10 of this Manual.
- 5. Failure to comply with the provisions of this policy may result in disciplinary action, up to and including dismissal.



**SUBJECT: Compliance Division Terminology** 

**SECTION:** 2-1

The purpose of this section is to define the terms, phrases, and abbreviations **PURPOSE:** 

referenced in this chapter.

**SCOPE:** This section applies to all OIG staff engaged in the function of conducting

investigations.

# **POLICIES & PROCEDURES:**

The following words, terms, and phrases, when used in this chapter, shall have the meanings described to them in this part:

## **DEFINITIONS**

Evidence means any form of proof or probative matter including but not limited to, physical property, electronic storage mediums, documents, drawings, instruments, photographs, audio and electronic recordings, witness statements, timesheets, travel vouchers, and other documentation (both hard copy and electronic).

Predicate Act means any act of fraud, waste, abuse, or corruption, or any other matter falling within the jurisdiction of OIG.

The terminology in this chapter may be amended as changes occur within the division.

APPROVED BY:

Shannon K. Manigault Inspector General

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**SUBJECT:** Office of the Inspector General Investigative Function

**SECTION:** 2-2

**PURPOSE:** The purpose of this section is to state the purpose, authority, and

responsibility of the OIG's investigative function

**SCOPE:** This section applies to all OIG staff engaged in the function of conducting

investigations.

# **POLICIES & PROCEDURES:**

# A. Governing Authorities

The City of Atlanta Office of the Inspector General's primary statutory authority relating to its investigative function is found in Article 8 of the City of Atlanta Charter. Article 8 provides OIG the authority and process to reasonably ensure that the city, and its officials and employees are complying with all applicable laws, rules and regulations, and internal policies and procedures; to provide and enforce standards of practice related to the performance and financial operation of the city; and for investigating allegations of waste, fraud, abuse, and corruption (illegal acts).

- B. The purpose of OIG's investigative function is to support the mission of OIG by detecting and preventing fraud, waste, abuse, and corruption in City projects, programs, and contracts; enforcing laws, rules and regulations, and internal policies and procedures, holding accountable those found to have violated some laws, and where possible, recovering public monies.
- C. The responsibility of OIG's investigative function lies with OIG's executive staff, Compliance Division personnel, and any other OIG staff members assigned to assist with an OIG investigation, including auditors and administrative staff.

## D. Initiating Investigations

1. No investigation will be initiated unless specifically authorized by the Inspector General or, in her absence, the Deputy Inspector General. If an investigation is initiated in the Inspector General's absence, the Inspector General will be apprised of the investigation as soon as possible.

- 2. An investigation may be initiated:
  - Upon a sworn written complaint by any person in a form prescribed by the Office of the Inspector General;
  - Upon request via Resolution by the Atlanta City Council;
  - Upon request by the Mayor of the City of Atlanta via administrative order;
  - Upon request by the City Transparency Officer; or
  - Upon the determination by the City Auditor or the presence of indications of fraud, or abuse or illegal acts are present as a result of an audit conducted in accordance with Section 2-603 of the City of Atlanta Charter;
  - Upon internal determination, supported by reasonable articulable suspicion, that any matter concerning waste, fraud, abuse, or corruption should be investigated or reviewed.
    - Reasonable articulable suspicion arises when the Inspector General possesses information indicating a violation of law, rules and regulations, or internal policies and procedures has occurred, is occurring, or may occur.
- 3. The Compliance Division may provide assistance to another governmental entity as directed and authorized by the Inspector General.
- 4. Investigations are initiated using the OIG Compliance Division Case Intake Form.
- 5. The *OIG Compliance Division Case Intake Form* is incorporated herein as Appendix B2-1 Complaint Intake Form.

**SUBJECT:** Investigative Staff

SECTION: 2-3

**PURPOSE:** The purpose of this section is to ensure that OIG investigative team

members collectively possess the necessary skills to conduct an

investigation.

**SCOPE:** This section applies to all OIG Compliance Division staff.

# **POLICIES & PROCEDURES:**

Due to the complex nature of the investigations conducted by OIG, it is important that all investigative team members collectively possess the knowledge, skills, and experience needed to properly conduct an investigation.

- A. The Deputy Inspector General is responsible for ensuring that all Compliance Division team members collectively possess, at a minimum:
  - 1. Familiarity with City of Atlanta government and its functions, activities, projects, programs, records, contracts, policies, and procedures.
  - 2. Prior investigative knowledge and experience in the areas of fraud, waste, abuse, and corruption.
  - 3. Training in the detection, investigation, and prevention of fraud, waste, abuse, and corruption in government affairs.
  - 4. Ability to conduct preliminary research necessary to carry out the types of investigations conducted by OIG.
  - 5. Specialized or technical skills depending on the subject matter being investigated.

B.	The Deputy Inspector General may delegate the responsibility of ensuring that all
	Compliance Division members possess the necessary skills to conduct an investigation to
	any Assistant Inspector General.

**SUBJECT:** Elements of Investigation

SECTION: 2-4

**PURPOSE:** The purpose of this section is to establish procedures for conducting an

investigation.

**SCOPE:** This section applies to all OIG Compliance Division staff.

# **POLICIES & PROCEDURES:**

While investigations vary in scope and complexity, all investigations conducted by the Compliance Division will, at a minimum, contain the following elements:

- A. Investigative Plan: A written *Investigative Plan* will be completed for all investigations conducted by OIG. The *Investigative Plan* will be prepared by the assigned investigator within ten days from the date that an OIG case is assigned for investigation. The *Investigative Plan* will outline the preliminary investigative steps anticipated by the investigator to conduct the investigation. The *Investigative Plan* will include the resources needed and estimated time required to complete the investigation. The *Investigative Plan* will be reviewed by an Assistant Inspector General and approved by the Deputy Inspector General prior to implementation. The procedure for preparing an *Investigative Plan* is covered in detail in Section 2-5 of this Manual. The *Investigative Plan* and *Investigative Plan Update* templates are incorporated herein as Appendix B2-2.1 Investigative Plan and B2-2.2 Investigative Plan Update.
- B. Evidence: All evidence and case supporting material collected during the course of an investigation will be properly documented and maintained. The procedure for the collection and storage of evidence is covered in detail in Section XX of this Manual.
  - 1. Evidence is any form of proof or probative matter gathered during an investigation. This includes, but is not limited to, physical property, electronic storage mediums, documents, drawings, instruments, photographs, audio and electronic recordings, and statements recorded in any form. Original documents and all other evidence will be secured in the area designated for evidence storage.

- 2. Investigators will coordinate the placing of evidence in the designated storage area with the AIGs. The procedure for documenting the receipt of evidence is covered in detail in Section XX of this Manual. The procedure for chain of custody and storage of evidence is covered in detail in Section XX of this Manual. The procedure for documenting the review of evidence is covered in detail in Section XX of this Manual.
- C. Investigative Activity: All investigative activities will be properly documented. A synopsis of each activity will be documented on the *Case Activity Log/Notes Form*. The *Case Activity Log/Notes* form template is incorporated herein as Appendix B2-3 Case Activity Log/Notes.
- D. Interviews: All interviews pertaining to an investigation will be properly conducted and documented. A synopsis of each interview will be documented on a *Report of Interview Form*. The procedure for conducting and documenting an interview is covered in detail in Section XX of this Manual. The *Report of Interview* form template is incorporated herein as Appendix B2-4 Report of Interview.
- E. Field Activity: All field activity pertaining to an investigation will be properly conducted and documented. A synopsis of the field activity will be documented on a *Field Activity Report Form*. The procedure for documenting field activity is covered in detail in Section XX of this Manual. The *Field Activity Report* form template is incorporated herein as Appendix B2-5 Field Activity Report.
- F. Closing Memorandum: At the conclusion of an investigation, a closing memorandum will be prepared. The procedure for preparing a closing memorandum is covered in detail in Section XX of this Manual.
- G. Timeframe from Case Assignment to Case Closure with Documented Supervisory Approvals for Extensions: Because all investigations differ in scope and complexity, it is recognized that each investigation will take a different amount of time to conclude. The goal is for each investigation to be concluded within 180 days from the date of assignment.
  - 1. Timeframe extensions will be granted on a case-by-case bases but are to be approved in advance by the Deputy Inspector General. To request an extension, the investigator assigned to the investigation, in consultation with the Assistant Inspector General, must complete an *Investigative Plan Update* detailing the reasons for the extension.

2.	The extension request should be submitted to the Deputy Inspector General at
	least 30 days prior to the expiration of the approved timeframe.

**SUBJECT:** Investigation Planning

**SECTION:** 2-5

**PURPOSE:** The purpose of this section is to establish procedures for preparing an

investigative plan for conducting an investigation.

**SCOPE:** This section applies to all OIG Compliance Division staff.

# **POLICIES & PROCEDURES:**

# A. Planning

- 1. Investigative work is to be adequately planned.
- 2. Effective planning provides the basis to clearly identify the investigative issues to be addressed prior to initiating the investigation.
- 3. Effective planning also recognizes that investigations must be flexible to shift investigative focus as facts and evidence are uncovered.
- B. A written *Investigative Plan* will be completed for all investigations conducted by OIG. The *Investigative Plan* will be prepared by the assigned investigator assigned to the case. (See Appendix B2-3.1 for the *Investigative Plan* template)
- C. The *Investigative Plan* will outline the preliminary investigative steps to be taken, the resources needed, and the estimated time that will be needed to conduct an investigation.
- D. The *Investigative Plan* will be prepared by the assigned investigator within ten days from the date that an OIG case is assigned for investigation. The *Investigative Plan* will be submitted to an Assistant Inspector General for review, then to the Deputy Inspector General who will approve the plan prior to implementation.
- E. The *Investigative Plan* will include the following:
  - 1. Cross-reference information including additional OIG case number(s), prosecutorial agency case number(s), other law enforcement agency case number(s), Ethics case number(s), or Audit report titles
  - 2. A detailed description of the complaint, allegation, violation, or issue

- 3. A listing of possible violations of relevant statutes, codes, ordinances, or policies
- 4. A checklist of the preliminary investigative steps to be taken
- 5. Other relevant information
- 6. An estimated time required to complete the investigation
- 7. Supervisory review
- 8. Deputy Inspector General approval
- F. Time Required to Complete the Investigation Because all investigations differ in scope and complexity, it is recognized that each investigation will take a different amount of time to conclude. The goal is for each investigation to be concluded within 180 days from the date of assignment.
- G. Investigative Plan Updates It is imperative that each investigator keep his/her supervisor informed of any significant changes in the investigation. This will be accomplished by the investigation preparing an *Investigative Plan Update*, as necessary. (See Appendix B2-3.2 for the *Investigative Plan Update* template)
- H. Extensions Timeframe extensions will be granted on a case-by-case basis but are to be approved by the Deputy Inspector General in advance. Requests for extension will be made using the *Investigative Plant Update* form which will state the reasons for the extension. The extension request should be submitted to the supervisor at least 30 days prior to the expiration of the approved timeframe.
- I. As with the initial *Investigative Plan*, all *Investigative Plan Updates* will be reviewed by an Assistant Inspector General and submitted to the Deputy Inspector General to approve the updated plan prior to implementation.

Shannon K. Manigault

Inspector General



**SUBJECT:** Independent Procurement Review Terminology

SECTION: 3-1

**PURPOSE:** The purpose of this section is to provide a list of terminology and

definitions referenced in the IPro chapter of the manual.

**SCOPE:** This section applies to IPro staff.

## **POLICIES AND PROCEDURES**:

The following words, terms, phrases, definitions, abbreviations, and acronyms when used in this manual shall have the meanings ascribed to them in this section, except where the context clearly indicates a different meaning:

### A. DEFINITIONS

Addendum means a notice issued by DOP providing all offerors key information about the solicitation, from due date extensions to the answers from questions submitted by bidders or proponents.

Advertisement means a public notice inviting responses or quotes on a specified project. The state mandates that all construction projects be published for a minimum of four (4) consecutive weeks. All other projects shall be published for a minimum of two (2) consecutive weeks. At a minimum, all projects shall be advertised on the City website at <a href="https://www.atlantaga.gov">www.atlantaga.gov</a>. In an effort to maximize the awareness for all public procurements, DOP also secures advertisement on the State of Georgia, Department of Administrative Services website at <a href="https://www.doas.ga.gov">www.doas.ga.gov</a>.

Agenda means a published list of legislative items to be discussed during Atlanta City Council committee meetings typically distributed on the Friday preceding the meetings.

Award means the announced selection of the winning vendor. An agency or department must submit a final recommendation for award to the CPO for a single or multiple award for DOP to extend to winning vendors.

*Bankruptcy* means relief for debtors who cannot repay creditors. The Financial Declaration and Disclosure Form requires offerors to disclose pending or active bankruptcy filings.

*Bid spread* means the percentage difference between quoted prices typically between the highest and lowest quotes. IPro uses a 20% bid spread as a potential indicator of collusive bidding.

Blackout period means the period from advertisement to contract award where communications with vendors about the solicitation is only allowed from the assigned contract specialist or the CPO's designee.

Cancellation means the stoppage of the procurement process on a solicitation. Reasons for cancellations can include receipt of no bids or proposals, limited competition, submittals containing errors, and costs exceeding estimated budgets. IPro identifies cancellations with the sole justification of "being in the best interest of the city" as a potential indicator of fraud.

City Code means laws enacted by City Council and included in the Code of Ordinances for the City of Atlanta.

CLEAR means an online data search software that allows the IPRO to conduct conflict of interest testing on city employees and key personnel from offerors competing for contract awards.

Collaborative scoring session means the time during which the evaluation team reviews responsive offeror submissions and collectively scores each proponent according to criteria listed on the evaluation of proposals. The contract specialist combines the scores awarded by the evaluation team, OCC and Risk in a collaborative scoring matrix. A zero score by OCC or Risk is equivalent to the offeror being deemed non-responsive.

Conflict of interest means a connection among vendors and city employees/officials, or the appearance of such a connection, that could impair their ability to fulfill their duty objectively.

Contract/Category Specialist means the procurement professional designated by the CPO to handle procurements.

Cooperative Procurement means an agreement that joins the city to an agreement conducted by another public procurement unit.

Chief Procurement Officer means the head of the Department of Procurement.

Department of Procurement means the department responsible for city purchasing.

Deputy Chief Procurement Officer means the person(s) reporting directly to the Chief Procurement Officer.

Due diligence means background research for information pertaining to the vendor's capacity and/or business integrity that could impact the City's decision as to whether to

conduct business with the vendor. For IPro reviews, this can involve searching databases and emails.

Emergency Procurement means a purchase that are critical to public safety.

Evaluation means collaborative scoring for RFPs based on vendors' qualifications given criteria outlined in a solicitation.

Evaluation team means a group of City employees selected and approved by the CPO to review submittals.

*Invitation for Bids* include definitive scopes of work and are typically awarded to the lowest responsible bidder.

Independent Procurement Review Officer (IPRO) means a member of the Independent Procurement Review of the Office of the Inspector General who conducts and drafts reports of reviews.

*Independent Procurement Review Division (IPro)* means the entity within the Office of the Inspector General that has employees who conduct and draft reports of reviews.

*IPro Report* means a summary of the observations or findings of a procurement review for communication to City Council.

*IPro Staff* means all classified, unclassified, temporary, and part-time employees of the division.

Letter of Intent means a form that is completed and signed by a subcontractor that has agreed to provide work for an offeror if its submission is successfully awarded the contract.

*Majority partner* means the joint venture partner with the largest percentage interest; generally, designated as the authorized representative.

*Minority partner* means the joint venture partner(s) that do not have the largest percentage interest.

Office of Contract Compliance means the entity responsible for promoting equal opportunity for disadvantaged, minority, female, and small businesses.

Offeror means the bidder, proponent, joint venture, or entity attempting to do business with the city.

Office of Risk Management means the entity responsible for evaluating, identifying, and analyzing potential risk exposures to the city.

Office of the Inspector General (OIG) means the entity charged with providing independent oversight related to fraud, waste abuse, and corruption.

*Opine* means to provide an opinion specifically about DOP's procurement process on a solicitation.

*Pre-Bid Conference* means a meeting for potential bidders to ask questions, exchange information or gain clarity in the presence of key stakeholders (DOP, user agency, Ethics, etc.).

*Pre-Proposal Conference* means a meeting for potential proponents to ask questions, exchange information or gain clarity in the presence of key stakeholders (DOP, user agency, Ethics, etc.).

Procurement/Category Manager means the procurement professional supervising contract specialists.

Project Team means the city employees collaborating to bring a solicitation to market. These employees include members of the evaluation team, the contract specialist, the procurement manager, a representative from OCC, a representative from Risk Management, and the project manager from the user agency.

*Project Team Meeting* means the meeting that occurs with the Project Team to discuss the business objectives and any risks associated with the future procurement.

*Red flag* means a condition or documentation that indicates potential risk.

*Referencing* means entering the filename and where applicable, page number(s) in the workpaper template to document and support findings and conclusions.

Requisition means a document utilized to request a purchase order with an estimated cost.

Responsible means the determination when the city deems an offeror that has the ability to satisfactorily comply with the scope of service, and all minimum requirements set forth in the solicitation document.

*Responsive* means the determination when the city deems an offeror that has submitted a bid or proposal that conforms in all material respects to the ITB or RFP.

Requests for Proposals means solicitations that are evaluated based on a variety of factors such as price, understanding of scope and objectives, and expertise.

*Sole Source Procurement* means work may be awarded without competition when, after conducting due diligence, there is only one source that will satisfy the needs.

Solicitation means the advertised requests for submittals posted by DOP with the intent to award a contract.

*Special Procurement* means an unusual or unique situation exists where competitive sealed bidding is contrary to the public interest.

Submittal means the documents vendors provide to respond to procurement requests.

TLO means an online data search software that allows the IPRO to conduct conflict of interest testing on city employees and key personnel from offerors competing for contract awards.

*User agency* means the entity requesting the procurement.

Waiver means documentation of a technicality or informality resulting in a variation from procurement requirements. The CPO shall sign a document capturing such deviation. Waivers should be included in the procurement file and shall be noted on the responsive checklist.

#### B. ACRONYMS/ABBREVIATIONS

CP – Cooperative Procurement

CPO – Chief Procurement Officer

DCPO - Deputy Chief Procurement Officer

EA/EP – Emergency procurement

IFB – Invitation for Bids

IPRO – Independent Procurement Review Officer

IPro – Independent Procurement Review Division

OCC – Office of Contract Compliance

OIG – Office of the Inspector General

RFP – Request for Proposals

Risk – Office of Risk Management

SP – Special Procurement

SS – Sole Source Procurement

## UA – User Agency

The terminology in this section may be amended as changes occur within the division.

APPROVED BY:

Shannon K. Manigault Inspector General



#### **POLICIES AND PROCEDURES**

**SUBJECT:** Independent Procurement Review Governing Policy

SECTION: 3-2

**PURPOSE:** The purpose of this section is to outline the statutory framework governing

the work of IPro.

**SCOPE:** This section applies to IPro staff.

#### **POLICIES AND PROCEDURES:**

- A. In accordance with Atlanta City Charter Article 8, Section 8-107, and Section 2-1604 of the Atlanta Code of Ordinances, the Independent Procurement Review Division of the Office of the Inspector General must review all solicitations with an aggregate value of \$1,000,000 or greater seeking approval by the Atlanta City Council, for file completeness, conflicts of interest, and other areas of perceived deficiency; and must review all cooperative purchase agreements and piggyback contracts with an aggregate base value greater than \$1,000,000; and may conduct discretionary reviews of any value. Discretionary reviews may be conducted pursuant to the Charter outside of the mandated reviews by Article 8, Section 8-107, and Section 2-1604 of the Atlanta Code of Ordinances.
- B. Reviews can include alternative procurements such as Sole Source, Special, Emergency, and Cooperative which differ from Invitations for Bids and Requests for Proposals procurement processes.
- C. In accordance with Charter, the Independent Procurement Review Officers (IPROs) shall not opine regarding the procurement process but shall provide an Independent Procurement Review Report to the respective Council Committee to confirm contract file are complete. If the review shows contract files are either incomplete or have areas of perceived deficiencies, the report outlines the deficiencies and may require responses from DOP for clarity.
- D. In accordance with the City Charter, the Atlanta City Council shall not approve legislation for contracts without first having received the Independent Procurement Review Report. This will be in the form of a report from the Inspector General or their designee to the Chief Procurement Officer, Deputy Chief Procurement Officer, Procurement management and staff, User Agency management and staff, Legislative Liaisons, and the Department of Law.

E.	E. As provided in the City Charter, IPROs shall have the authority to observe all stages of the procurement process. and shall be provided all documents and resources by the Chie Procurement Officer or designee needed to complete an independent procurement review			
	APPROVED BY:			
	Shannon K. Manigault Inspector General			

#### POLICIES AND PROCEDURES

**SUBJECT:** Independent Procurement Review Project Policy

SECTION: 3-3

**PURPOSE:** The purpose of this section is to provide guidance for receipt, assignment,

review, referencing, and reporting for IPro projects.

**SCOPE:** This section applies to IPro staff.

#### **POLICIES AND PROCEDURES:**

#### A. Conducting Reviews

- 1. Independent Procurement Reviews are designed using criteria from the City of Atlanta Department of Procurement's standard operating procedures and guidance, applicable laws and regulations from Atlanta City Code and the Official Code of Georgia Annotated (OCGA), as well as standards and best practices published by various professional organizations such as the Association of Inspectors General (AIG), Association of Certified Fraud Examiners (ACFE), and the Institute of Internal Auditors (IIA).
- 2. For mandatory reviews, the Independent Procurement Review shall commence upon receipt of notification of expected procurement from the Chief Procurement Officer or designee. The Deputy Inspector General for the Independent Procurement Review Division will assign each solicitation to an IPRO and create project folders at the time of assignment. The IPro Division may initiate mandatory and discretionary reviews without notification from the Department of Procurement.
- 3. The assigned IPRO will annually review and sign the Independence from Impairments Attestation and Confidentiality Standards maintained by the Office of the Inspector General. Prior to and during reviews, the officer will communicate any known or perceived conflicts of interest. Each officer is responsible for disclosing any potential threats to their independence. The Inspector General or their designee is responsible for assessing any identified threat and determining if the conflict can be mitigated or requires the solicitation to be assigned to another officer.
- 4. The assigned IPRO is responsible for completing the following:

- a. A workpaper that captures the steps of the procurement review;
- b. File folders organized for referencing purposes that mirror the review documented in the workpaper; and
- c. Reviewing DOP's instructions to vendors in procurement forms when determining completeness, reliability, and accuracy of submittals.
- 5. The assigned IPRO will not generate work product that contains personally identifiable information.
- 6. Upon completion of the review, the assigned IPRO will complete a draft report for internal review prior to sending a draft version to DOP for review and responses (if applicable) to complete a final report to be sent to City Council and stakeholders.

APPROVED BY:

Shannon K. Manigault Inspector General



#### POLICIES AND PROCEDURES

**SUBJECT:** Independent Procurement Reviews for IFB and RFP Procurements

SECTION: 3-4

**PURPOSE:** The purpose of this policy is to provide guidance for conducting IPro

reviews for IFBs and RFPs.

**SCOPE:** This section applies to IPro staff.

#### **POLICIES AND PROCEDURES:**

Save the workpaper with a project reference in the filename. When referencing in the workpaper, include references to specific locations of information such as page numbers, document tabs, and cells.

The purpose of the following structure is to capture the core elements of the procurement processes for IFBs and RFPs. Although the terminology and process surrounding the procurement process may change, this structure is intended to provide a framework for conducting IPro reviews.

#### A. Workpaper Structure for RFPs and IFBs

- 1. Evaluation Team (if applicable requirement for RFPs)
  - a. Obtain letter to CPO listing recommended/approved evaluators
  - b. Confirm employment with the city during evaluation period
  - c. Review relevance of experience on resumes for informed scoring
  - d. Obtain copies of executed ethics forms
  - e. Obtain other forms that may be listed as requirements (i.e., Evaluator Commitment Form)
- 2. Solicitation (documents that provide information to potential suppliers)
  - a. Review procurement initiation documents (trigger, PREP, etc.)
  - b. Review for previous cancellations of current procurement, if any, and record reasons
    - i. Inquiry of DOP
    - ii. Search historical the IPro SharePoint site
    - iii. Search Oracle and DOP website
  - c. Save solicitation from Oracle
  - d. Review selection/evaluation criteria

- e. Review required submittal list
- f. Review Office of Contract Compliance goals
- g. Review Risk Management goals
- h. Attend project team meeting for discussion about solicitation or obtain evidence it occurred
- i. Obtain project schedule (schedule, RACI)
- 3. Advertisement/Addenda (public request for submittals and documents changing requirements)
  - a. Take screenshots of advertisement and closing dates from Oracle
    - i. Calculate time between advertisement and close
  - b. Save/request addenda
    - i. Review addenda changes in requirements
    - ii. Count number of addenda
  - c. Check for advertisement on Georgia Procurement Registry
- 4. Submittal (vendor submittals)
  - a. Take screenshot of vendor submittals from Oracle with timestamps
  - b. Record entity names such as joint ventures, partners, subcontractors (Subcontractor Utilization Form and/ or Letters of Intent); for subcontractors, list one entity per line in alphabetical order
  - c. Note if primes are included on other submittals
- 5. Responsive Review (summary of DOP's review for required documents)
  - a. Save vendor submittals in folders for testing
  - b. Compare checklist with required submittal list from the solicitation
  - c. List out primes (joint ventures, partners) in review document for each submittal in separate columns
  - d. Note differences between IPro and DOP reviews (workpaper should match DOP checklist)
    - i. Obtain documentation if DOP grants waiver for a requirement
  - e. Save non-responsive letters (if applicable)
- 6. Evaluation
  - a. Record Office of Contract Compliance scores check for supplier outreach efforts if goal is not reached but deemed responsive
  - b. Record Risk Management scores note if waivers granted and obtain copies
  - c. Record final scoring/ bid tabulation
    - i. Calculate bid spreads between highest and lowest bids for IFBs
  - d. Recalculate scores for accuracy and note differences between IPro and DOP reviews
  - e. Review scoring sign-in sheet for project reference, dates, and names of approved evaluators

- 7. Award or Cancellation
  - a. Save User Agency cancellation or award recommendation letters for current procurement
    - i. Save non-award letters if applicable
  - b. Save DOP cancellation or award letters for current procurement
  - c. Note if highest score (RFP) or lowest bid (IFB) awarded or not
  - d. Save non-responsive and non-award letters if applicable
  - e. Review if more awards granted than anticipated
  - f. Complete list of required documents for procurement file
- 8. Due diligence (database (such as TLO, CLEAR) and email searches for violations and impropriety)

#### Database checks

- a. Search the IPro SharePoint site for existing reports for vendor contacts prior to performing new ones; save to the specific project folder
  - i. Run new report on all submittals if not found or if existing reports are more than 60 days old
  - ii. Focus testing on proposed awardee contacts such as company names, principals, and management listed on the Contact Directories or in other documents (try for at least five contacts)
  - iii. Perform general testing for non-responsive/non-awarded submittals
- b. Search the IPro SharePoint site for existing reports for city contacts prior to performing new ones; save to the specific project folder
  - i. Run new report if not found or used or if existing reports are more than 60 days old
  - ii. Focus testing on key city contacts (executive office, procurement staff and management, user department evaluators and contacts)
- c. Record pending or closed litigation or bankruptcies in the last five years

#### Email review

- a. Complete the investigative email request to submit to AIM
- b. Include names of contacts from database inquiries
- c. Include project names and numbers
- d. Construct time period from 30 days prior to advertisement to receipt of the award recommendation from the User Agency
- e. Download and open employee emails
  - i. Using the link from AIM/vendor, download email (pst) files into the Downloads folder
  - ii. Open Outlook. Go to File>Open & Export>Open Outlook Data File
  - iii. Browse and select the email (pst) file from the Downloads folder
  - iv. Click 'OK'
  - v. Access the emails in Personal Folder (usually titled "Exchange" or the name of the file)
  - vi. Save a copy of the email (pst) file with the link to the email file in the project folder

Record observations in an IPro generated summary sheet with used search terms and with references to support from database reports and emails

APPROVED BY:

Shannon K. Manigault Inspector General



#### POLICIES AND PROCEDURES

**SUBJECT:** Independent Procurement Reviews for Alternative Procurements

**SECTION:** 3-5

**PURPOSE:** The purpose of this policy is to provide guidance for conducting IPro

reviews for alternative procurements.

**SCOPE:** This section applies to IPro staff.

#### **POLICIES AND PROCEDURES**:

Save the workbook with a project reference in the filename. When referencing in the workpaper, include references to specific locations of information such as page numbers, document tabs, and cells.

The purpose of the following structures is to capture the core elements of the procurement process. Alternative procurements typically contain fewer steps than IFBs and RFPs. Although the terminology and process surrounding the procurement process may change, this structure is intended to provide a framework for conducting IPro reviews.

A. Workpaper structure for Cooperative Procurements (CP):

- 1. Award
  - a. Procurement request form from UA
  - b. Department memo to CPO attesting that substantial needs will be met and the service or commodity was procured by competitive means
  - c. IIREA form
  - d. Statement of work and quotes that match the cooperative agreement
  - e. Copy of actively "competitively" procured agreement
  - f. Insurance (if applicable)
  - g. SAM.gov compliance
  - h. License to Transact Business
  - i. Final DOP determination letter with the CPO's signature
- 2. Due diligence (database (such as TLO, CLEAR) and email searches for violations and impropriety)

#### Database checks

- a. Search the IPro SharePoint site for existing reports for vendor contacts prior to performing new ones; save to the specific project folder
  - i. Run new report on all submittals if not found or if existing reports are more than 60 days old
  - ii. Focus testing on proposed awardee contacts such as company names, principals, and management listed on the Contact Directories or in other documents (try for at least five contacts)
- b. Search the IPro SharePoint site for existing reports for city contacts prior to performing new ones; save to the specific project folder
  - i. Run new report if not found or used or if existing reports are more than 60 days old
  - ii. Focus testing on key city contacts (executive office, procurement staff and management, user department evaluators and contacts)
- c. Record pending or closed litigation or bankruptcies in the last five years

#### Email review

- a. Complete the investigative email request to submit to AIM
- b. Include names of contacts from database inquiries
- c. Include project names and numbers
- d. Construct time period from 30 days prior to advertisement to receipt of the DOP determination letter with the CPO's signature
- e. Download and open employee emails
  - i. Using the link from AIM/vendor, download PST files into the Downloads folder
  - ii. Open Outlook. Go to File>Open & Export>Open Outlook Data File
  - iii. Browse and select the email (pst) file from the Downloads folder
  - iv. Click 'OK'
  - v. Access the emails in Personal Folder (usually titled "Exchange" or the name of the file)
  - vi. Save a copy of the email (pst) with the link to the email file in the project folder

Record observations in an IPro generated summary sheet with used search terms and with references to support from database reports and emails

- B. Workpaper structure for Special (SP), Sole Source (SS), and Emergency (EA/EP) Procurements:
  - 1. Award
    - a. Procurement request form from UA
    - b. Department memo to CPO detailing the unusual and unique situation for SPs and SSs or detailing crisis or threat for EAs

- c. IIREA form
- d. Statement of work and corresponding competitive quotes (at a minimum three (3) quotes shall be reflected or justification otherwise)
- e. Insurance (if applicable)
- f. Approved requisition
- g. SAM.gov compliance
- h. License to Transact Business
- i. Final DOP determination letter with the CPO's signature
- 2. Due diligence (database (such as TLO, CLEAR) and email searches for violations and impropriety)

#### Database checks

- a. Search the IPro SharePoint site for existing reports for vendor contacts prior to performing new ones; save to the specific project folder if used
  - i. Run new due diligence report on all submittals if not found or if existing reports are more than 60 days old
  - ii. Focus testing on proposed awardee contacts such as company names, principals, and management listed on the Contact Directories or in other documents (try for at least five contacts)
- b. Search the IPro SharePoint site for existing reports for city contacts prior to performing new ones while considering recency of reports; save to the specific project folder if used
  - i. Run new due diligence report if not found or if existing report is more than 60 days old
  - ii. Focus testing on key City contacts (executive office, procurement staff and management, user department evaluators and contacts)
- c. Record pending or closed litigation or bankruptcies in the last five years

#### Email review

- a. Complete the investigative email request to submit to AIM
- b. Include names of contacts from database inquiries
- c. Include project names and numbers
- d. Construct time period from 30 days prior to advertisement to receipt of the DOP determination letter with the CPO's signature
- e. Download and open employee emails
  - i. Using the link from AIM/vendor, download.PST files into the Downloads folder
  - ii. Open Outlook. Go to File>Open & Export>Open Outlook Data File
  - iii. Browse and select the email (pst) file from the Downloads folder
  - iv. Click 'OK'
  - v. Access the emails in Personal Folder (usually titled "Exchange" or the name of the file)
  - vi. Save a copy of the email (pst) with the link to the email file in the project folder

Record observations in an IPRO generated summary sheet with used search terms and with references to database reports and emails

APPROVED BY:

Shannon K. Manigault Inspector General



#### POLICIES AND PROCEDURES

**SUBJECT:** Report Writing and Referencing Procedures

SECTION: 3-6

**PURPOSE:** The purpose of this document is to provide guidance for writing and

referencing the IPro report to communicate and support results of the

review.

**SCOPE:** This section applies to IPro staff.

#### **POLICIES AND PROCEDURES:**

1. Select the appropriate IPro report template from the IPro SharePoint site.

- 2. Save a copy of the report template with a project reference in the file name.
- 3. Complete the Background section, list the procurement user agency, procurement type, brief procurement type description, and any previous cancellations from the workbook review and supporting documentation
- 4. Complete the table to include the following information:
  - a. Solicitation number
  - b. Project name
  - c. Estimated dollar value
  - d. Term
  - e. Recommended awardee (one entity per line in alphabetical order)
  - f. DOP responsive bidders (one entity per line in alphabetical order)
  - g. All bidders (one entity per line in alphabetical order)
- 5. Complete the Observations and Responses section by listing and numbering observations by phase of the procurement from the workbook review and supporting documentation. Include criteria such as DOP SOPs, solicitation requirements, and City Code.
  - a. For observations that appear from external factors such as limited submissions or where DOP proactively notes and supports when there are deviations in the process, cite the condition and criteria (if applicable) then the potential impact. These observations typically do not require a response from DOP.

- b. For observations that appear to result from internal factors, cite the condition and criteria (if applicable) then the potential impact
- c. Observations shall not include opinions about the procurement process.
- 6. Use the Office of Inspector General Stylebook when drafting reports.
- 7. Save one version of the report in Word format on the IPro SharePoint site for the review and revision (if applicable) process.
- 8. Upon completion, send notification to Deputy Inspector General for the Independent Procurement Review Division.

APPROVED BY:

Shannon K. Manigault Inspector General



#### **MISSION**

The City of Atlanta Office of the Inspector General (OIG) endeavors to ensure that the government of the City of Atlanta operates with integrity and efficiency. Through prevention, investigation and review, and enforcement, OIG seeks to eliminate fraud, waste, abuse, and corruption, and thereby build community trust and make City government more accountable to its constituents.



#### MISSION STATEMENT RECEIPT

**MISSION** 

The City of Atlanta Office of the Inspector General (OIG) endeavors to ensure that the government of the City of Atlanta operates with integrity and efficiency. Through prevention, investigation and review, and enforcement, OIG seeks to eliminate fraud, waste, abuse, and corruption, and thereby build community trust and make City government more accountable to its constituents.

# ACKNOWLEDGEMENT ANNUAL STATEMENT OF RESPONSIBILITY AND UNDERSTANDING

Mission Statement acknowledgement	nt for year <u>2023</u> .	
I,understand the OIG's Mission State the mission and goals of OIG pursua	ment. I agree to promote and	, ,
	Signature	Date



## ORGANIZATIONAL CHART RECEIPT

### **ACKNOWLEDGEMENT**

Organizational Chart acknowl	edgement 2023.	
_	al structure and reporting stand that the organizational cha	ledge that I have received, read, and requirements set forth in OIG's art will be modified as changes occur
	 Signature	Date



# PRINCIPLES AND STANDARDS FOR OFFICES OF INSPECTOR GENERAL RECEIPT

_	ACKNOWLEDGEMENT	
1,	, acknowledg	ge that I have received, read, and
understand the Principles and	Standards for Offices of Inspector G	eneral, also known as "the Green
Book." I understand that the	Green Book principles and standards	s will be the industry guide used
	he OIG Policies and Procedures Mar	• •
•		
	Signature	 Date

#### OIG STANDARDS OF CONDUCT ANNUAL STATEMENT OF UNDERSTANDING AND RESPONSIBILITY FORM

As an employee of the City of Atlanta Office of the Inspector General (OIG), I am aware of my responsibility to comply with the Code of Ethics as set forth in Section 2-801 of the City of Atlanta Code of Ordinances, *Standards of Conduct*. Public trust is earned as OIG employees conduct themselves in accordance with the high standards established by the Office. As an OIG employee, I shall adhere to the highest ethical principles by conducting my work with integrity.

#### **RESPONSIBILITIES TO OIG**

Each OIG employee must maintain the highest standards of conduct and ethics in all official and personal actions. Each OIG employee must conduct themselves with honesty and integrity.

Integrity is the cornerstone of all ethical conduct, ensuring adherence to accepted codes of ethics and practice. Objectivity, independence, professional judgment, and confidentiality are all elements of integrity.

Public office carries with it a responsibility to apply public resources economically, efficiently, and effectively. OIG employees will work to detect and deter fraud, waste, and abuse within the City of Atlanta's programs and projects, as well as evaluate the efficiency and effectiveness of such programs. OIG employees will also conduct their own work in a manner that uses public resources economically, efficiently, and effectively.

Each OIG employee will uphold and support the Constitution and laws of the United States and the Constitution and laws of the State of Georgia, and follow local laws, and the procedures established by the City of Atlanta and OIG. OIG employees will conduct their work within the bounds of the authority granted to the Office in Article 8 of the Charter of the City of Atlanta. OIG staff will conduct fair and impartial investigations, audits, and reviews to identify potential fraud, waste, abuse and corruption in City activities, projects, programs, or contracts.

#### **CONFLICT OF INTEREST**

The Inspector General and OIG staff involved in performing or supervising an investigative, audit, or other assignment must be free from personal, external, and organizational impairments to independence. Employees will refer to Section 1-6 of the OIG Policies and Procedures Manual, which sets out the principles for maintaining the independence of OIG and OIG staff.

Employees will avoid activities which would compromise or give the perception of compromising the best interests of OIG. Employees will conduct investigations, audits, and reviews fairly and objectively.

Employees will avoid any private or professional activity that would create a conflict between their personal interest and the interests of OIG. Employees will avoid the appearance of unethical or compromising practices in their actions and communications.

#### **GIFTS**

OIG employees will never solicit or accept gifts of any kind, including but not limited to: money, loans, entertainment, favors, or services, as such gifts might influence or appear to influence the decisions, results, or conclusions of their work. Any gifts sent to employees in connection with their employment will be returned with an explanation. If perishable, the gift will be returned, if possible, donated to a charity in the name of the sender, or consumed by the office.

#### **CONFIDENTIAL INFORMATION**

Maintaining the confidentiality of information is of paramount importance to OIG. Employees will refer to Section 1-7 of the OIG Policies and Procedures Manual, which sets out the principles for maintaining the confidentiality of information of OIG and OIG staff.

#### **MISUSE OF RESOURCES**

OIG employees are expected to use city resources for OIG business only. Information gleaned from an investigation, audit, or review is not to be used for personal business or benefit. Databases and other sources of information OIG utilizes to conduct its work should not be accessed, searched, or in any way used for personal knowledge or benefit. The consequences for the misuse of resources are severe and will result in disciplinary action, up to and including immediate dismissal from the office.

## ACKNOWLEDGEMENT ANNUAL STATEMENT OF UNDERSTANDING AND RESPONSIBILITY

Standards of Conduct acknowledgement for year	ar <u>2023</u> .	
Iconveys OIG's commitment to integrity, fairner OIG's principal objective to restore and promote to abide by the concepts and requirements set for and Procedures Manual Section 1-5.	the public's trust in government. I ackn	nt. I will advance owledge and agree
	Signature	Date

Original: OIG Personnel File

Copy: Employee

#### INDEPENDENCE FROM IMPAIRMENTS ATTESTATION

City of Atlanta Office of the Inspector General (OIG) employees must be free both in fact and appearance from personal, external, and organizational impairments to independence. The Inspector General and OIG staff have a responsibility to maintain independence, so that findings, conclusions, and recommendations will be impartial and will be viewed as impartial by third parties. The Inspector General and OIG staff should avoid situations that could lead third parties with knowledge of the relevant facts and circumstances to conclude that the Office is not able to maintain independence in conducting its work.

There are circumstances in which the Inspector General or OIG staff cannot be impartial because their personal, external or organizational situations may create actual or perceived conflicts of interest. In such situations, OIG employees who are impacted by these circumstances will report the impairment pursuant to Section 1-6 of the OIG Manual of Policies and Procedures in order to disqualify themselves from any work on the matter and allow the work to continue without them.

#### PERSONAL IMPAIRMENTS

Personal situations may create actual or perceived conflicts of interest. Personal impairments may include, but are not limited to the following:

- Official, professional, personal, or financial relationships with any person or entity under investigation, audit, inspection, or review, which could or may appear to affect the OIG staff member by changing, limiting, or altering the scope or the outcome of the work.
- 2) Preconceived ideas or biases towards activities, individuals, groups, organizations, objectives, or particular programs that could affect or may be perceived as affecting the objectivity of the OIG staff and the outcome of the work.
- 3) Previous involvement, whether as staff, managerial or in a decision-making capacity, regarding the subject of an investigation, audit, inspection, or review that could or may be perceived as affecting the objectivity or the outcome of the OIG's work.

#### **EXTERNAL IMPAIRMENTS**

Factors external to OIG can restrict the efforts of or interfere with OIG's ability to form independent and objective opinions and conclusions. For example, under the following conditions, work could be adversely affected and OIG would not have complete freedom to make an independent and objective judgment:

- 1) Interference or undue influence in the selection, appointment, and employment of the Inspector General or OIG staff.
- 2) Interference or undue interference with the OIG budget.
- 3) Limiting or interfering with access to evidence, documents, records or individuals necessary to conduct the investigation, audit, inspection or review.
- 4) Improper political pressure intended to influence the selection of or the performance of an investigation, audit, inspection or review or the reporting of findings.

#### **ORGANIZATIONAL IMPAIRMENTS**

An oversight organization's independence can be affected by its place within the structure of the government entity of which it is a part. OIG was created as an independent entity responsible for detecting fraud, waste, abuse, corruption, and misconduct without political influence. OIG should be insulated from any interference or influence by any individual or department within City of Atlanta government that might affect the independence and impartiality of the office.

#### REPORTING REQUIREMENTS

On an annual basis, each OIG employee will execute the attached *Independence from Impairments Attestation Form* by January 31<sup>st</sup> of each year.

If a personal, external, or organizational impairment occurs at any time, the affected OIG employee must document and discuss the situation with the Inspector General and execute an IMPAIRMENT NOTIFICATION FORM (Appendix A1-6.2 of the OIG Policies and Procedures Manual).

Failure to disclose an actual or potential conflict of interest may subject the OIG staff member to disciplinary action, up to and including termination.

#### **ATTESTATION**

Independence from Impairments Attestation for year					
I,	_,	submit	this	Independence	from
I have no impairments in the performance of r	ny (	duties.			

I have an impairment for which I (Appendix A1-6.2).	will complete a Notification of Impairment Form
• •	re true and complete, and I agree to abide by the endence from Impairments, of the OIG Policies and
Signature	Date
Original: OIG Personnel File	

Copy: Employee

#### **POLICIES AND PROCEDURES**

City of Atlanta Office of the Inspector General (OIG) employees must be free both in fact and appearance from personal, external, and organizational impairments to independence. In circumstances where the Inspector General or OIG staff cannot be impartial because their personal, external, or organizational situations may create actual or perceived conflicts of interest, the employee is to <u>immediately</u> report the impairment pursuant to Section 1-6 of the OIG Policies and Procedures Manual in order to disqualify themselves from any work on the matter and allow the work to continue without them.

#### **IMPAIRMENT NOTIFICATION**

Impairment occurred, relating to case number					
Check one:					
Personal	External	Organizational			
DESCRIPTION OF	IMPAIRMEN	T: (Attach description	on separate	sheet if needed)	
Printed Name		Signature		Date	
Reviewed by:					
	Deputy/Assi	stant Inspector General	Date		
Reviewed by:	Inspector Ge	on aval	Date		
	mspeciol Ge	eneral	Date		
ACTION TAKEN:					

Original: Personnel File

Copy: Case File Copy: Employee

OIG Policies and Procedures Manual Appendix A1-6.2 Effective August 7, 2023 Page 1 of 1

#### OIG EMPLOYMENT CONFIDENTIALITY AGREEMENT

#### **Confidentiality Standards**

- 1. Maintaining the confidentiality of information is of paramount importance to the OIG. It is the cornerstone to conducting fair, impartial and effective investigations. It is essential in maintaining the integrity of the OIG and its operations. The public, governmental officials and other criminal justice and law enforcement agencies have an expectation that information received by the Office of the Inspector General will be treated in a professional and confidential manner.
- 2. OIG conducts reviews and investigates allegations that may result in a finding that no wrongdoing was committed. As such, it is imperative that no information be revealed prematurely that may reflect erroneously on a person or entity and cause that person or entity undue and unnecessary harm to their reputations and integrity.
- 3. Any information pertaining to OIG activities, including but not limited to investigations, audits, inspections, litigation, administrative actions or other work, is not to be disclosed or discussed with anyone external to the OIG, unless such disclosure is unavoidable or necessary during the course of the OIG work assignment.
- 4. Disclosure of any records pertaining to OIG work will be as required by law and/or at the discretion of the Inspector General in accordance with Section 1-7 of the OIG Policies and Procedures Manual.

#### ACKNOWLEDGEMENT AND AGREEMENT

I, \_\_\_\_\_\_, acknowledge that I have received, read, and fully understand my responsibility regarding the disclosure of information and records relating to the work of the Office of the Inspector General. I agree to abide by the OIG Policies and Procedures Manual Section 1-7 relating to Employee Confidentiality.

I understand and agree that in the event of a breach of this Employee Confidentiality Agreement, I may be subject to disciplinary action, up to and including termination. Furthermore, I understand that termination of employment may not be the only sanction or remedy sought by the OIG and that the Inspector General may pursue legal action.

This agreement supersedes any other confidentiality agreement the employee may have signed the is dated prior to the execution of this agreement.				
Signature	Date			
Original: OIG Personnel File				
Copy: Employee				



## HEALTHY WORK ENVIRONMENT RECEIPT

	ACKNOWLEDGEMENT	
	ACKNOWLEDGEMENT	
•	, acknowledge Environment policy. I understand t the Office as set forth in the OIG l	1 -
	Signature	Date



## **INVESTIGATIVE PLAN**

CA	CASE NUMBER/NAME:				
	restigation initiated pursua $8-101(f)(1)$ $\square 8-101(f)(2)$		□8-101(f)(4) □	□8-101	(f)(5) $\square 8-101(f)(6)$
1.	( )	` '			
	Name	Positio	on Title		Agency
2.	COMPLAINANT(S)				
	Name	Positi	on Title		Contact Information
3.	OTHER DEPARTMEN	NTAL CONTACT(	S) (e.g., Humar	ı Resou	ırces/Payroll)
	Name	Position	Title		Agency
4.	SPECIFIC ALLEGAT	ION(S) TO BE INV	ESTIGATED		
	Allegation			Partie	s Involved
5.	MATTER(S) CONSID	ERED TO BE OUT	SIDE OF INV	ESTIG	SATION SCOPE

6.	RELEVANT STATUT	ΓES, REGULATIONS, PO	LICIES, PROCEDURES
7.	POTENTIAL SOURCE	CE(S) OF EVIDENCE/INF	ORMATION
8.	PEOPLE WHO MAY	NEED TO BE INTERVIE	WED
	Name	Position Title	Agency
9.	INVESTIGATION CO	OMMENCEMENT DATE	(including preliminary inquiry)
10.	EXPECTED COMPL	ETION DATE (180 days fr	rom case assignment)
	POST INVESTIGATI		
(]	nclude administrative/o	criminal referrals, prosecut	cion, sentencing, restitution)

12	OTHED	INFORMATION	DEDTINENT TO	THE INVESTIGATION
IZ.	OIHER	HNFORWALION	I PRRIINBANI IO	THE INVESTIGATION

(Include a brief summary of the complaint and any information discovered during the initial review of the case)

Investigator:	
[Name] [Position/Title] [Date]	
Reviewed by:	
[Name] Assistant Inspector General [Date]	
Approved by:	
Shelby J. Williams Deputy Inspector General [Date]	



# **INVESTIGATIVE PLAN UPDATE**

## **CASE NUMBER/NAME:**

1.	AUTHORITY			
То	To conduct an investigation pursuant to (check one):			
	$\Box$ 8-101(f)(1)	$\Box$ 8-101(f)(4)		
	$\Box 8-101(f)(2)$	$\Box 8-101(f)(5)$		
	$\Box$ 8-101(f)(3)	$\Box 8-101(f)(6)$		
2.	ADDITONAL SUR	SJECT(S) OF THE ALLI	EGATION(S)	
	Name	Position		Agency
				<b>.</b>
3.		LEGATION(S) TO BE I		
	Allegat	ions	Parti	ies Involved
4.	4. ADDITIONAL ISSUES/MATTERS DISCOVERED DURING THE INVESTIGATION			
	INVESTIGATION			

5.	ADDITIONAL RELE PROCEDURES	VANT STATUTES, REG	ULATIONS, POLICIES,
6.	ADDITIONAL SOUR	CE(S) OF EVIDENCE/IN	FORMATION
7.		LE WHO MAY NEED TO	
	Name	Position Title	Agency
8.	INVESTIGATION CO	OMMENCEMENT DATE	(including preliminary inquiry)
о. П	INVESTIGATION CO	SMINIENCEMENT DATE	(mending premimary inquiry)
L.			
9.	EXPECTED COMPL	ETION DATE (including	additional time/extension granted)
10	. ADDITIONAL POST	INVESTIGATION ACTI	VITY
			tion, sentencing, restitution)

## 11. OTHER INFORMATION/CHANGES TO THE INVESTIGATION

(Include justification for case extension request, change of investigative scope, and any significant changes to the investigation)

Investigator:	
[Name] [Position/Title] [Date]	
Reviewed by:	
[Name] Assistant Inspector General [Date]	
Approved by:	
Shelby J. Williams Deputy Inspector General [Date]	



## **CASE ACTIVITY LOG/NOTES**

Case # / Name	
Investigator(s)	
DATE	ACTIVITY/NOTES



## CITY OF ATLANTA OFFICE OF THE INSPECTOR GENERAL

#### **REPORT OF INTERVIEW**

Interview Date/Time:	Case No:
Interviewee:	Department/Title:
Investigator:	<b>Contact Information:</b>
Location:	
If city employee, reviewed and signed City 1	Employee Interview Warning (Y/N)?
	"Title/Namel interviewed [enter namel recording

On the above noted date and time, [Investigator Title/Name] interviewed [enter name] regarding [enter information here]. After identifying herself and advising [enter interviewee's name] of the nature of the interview, [enter name of the interviewee] provided the following information:

## (Use bullets or paragraph format in this section)

Interview ended at [enter time and time of day].		
Completed by:	Reviewed by:	
[Investigator Name] Date [Title]	[Name] [Title]	Date



#### CITY OF ATLANTA OFFICE OF THE INSPECTOR GENERAL

## **FIELD ACTIVITY REPORT**

Activity Date/Time:	Case No:
Activity Type:	Department/Title:
Investigator(s):	Equipment Used:
Location:	
Video/Audio Recording (Y/N)?	
activity] regarding [enter information h Name] observed the following:	Investigator Title/Name] conducted [enter specific fielere]. In the course of the [field activity], [Investigator Last paragraph format in this section)
(Ose bullets or	paragraph format in this section)
Field activity ended at [enter time and t	ime of day].
Completed by:	Reviewed by:
[Investigator Name] Date [Title]	[Name] Date [Title]