

Ethics Review Board City of New Orleans

Board Meeting

August 22, 2018 3:35 P.M. – 4:30 P.M.

City Council Chambers | 1300 Perdido Street | New Orleans, Louisiana 70112

Minutes of Board Meeting

Board Members Present: James Brown, Chair

Brandon Boutin

Elizabeth Calderon (joined mid-meeting)

Allen Miller Joe Ricks

Howard Rodgers

Staff Present: Jessica Lang, Administrative Assistant

Call to Order: At 3:35 p.m., a quorum being present, the Chair called the meeting to order.

1. Approval of Minutes of July 30, 2018 (Chair).

On a motion by Mr. Rodgers and a second by Mr. Boutin, the board unanimously approved the minutes of the July 30, 2018, after correcting the spelling of the last name of Mr. Howard L. Rodgers on the last page of the draft minutes.

2. Report of the Office of the Inspector General (Chair).

IG Derry Harper appeared on behalf of the Office of Inspector General.

Mr. Harper discussed three documents that he also provided to the Board. These letters are attached and made part of the minutes, including the following: (1) Mr. Harper's letter to Ms. Tran (Aug. 22, 2018); (2) Ms. Tran's letter to Mr. Harper (Jul. 16, 2018); and, (3) Peer Review Letter re New Orleans IG's Office (Jun. 11, 2018)

Mr. Harper stated that the IG's office is very important and that he was pleased that the peer-review team gave the office a favorable review.

Mr. Harper discussed the standards applicable to inspectors general that were applied in the peer review. Those standards are designed to assure that inspectors general produce credible and competent investigations and reports.

Mr. Harper discussed the "management letter" prepared by Ms. Tran on behalf of the peer review committee dated July 16, 2018. First, he read from the letter the areas of distinction. (The letter speaks for itself.) Second, he responded to recommended areas of improvement. His office agreed with them all. His office has implemented CPE requirements for the office's auditors. His office has improved document storage practices. His office has implemented a suggestion to improve the case-management system used by the investigation division. His office has implemented a formal follow-up procedure after issuing a draft report. His office has removed the technical assistant as a project category. (These suggested improvements and responses are set forth in the documents provided to the board and speak for themselves.)

Mr. Harper also addressed the "overall consideration" by of "career advancement" raised by the peer review team. At present, there are not "promotional opportunities" for many staff members in the OIG. Mr. Harper finds this to be "challenging." He needs more time to implement this. At present, there are limited opportunities for advancement to supervisory responsibility. There are limited "classified" and "unclassified" slots. He is restructuring the office. He will work on this issue going forward as he implements the new staffing structure in the office.

Mr. Brown asked whether the peer review report of June 11, 2018, was the "final" report to be provided to the City and its governing units. Mr. Harper considers all three letters (attached) collectively constitute the "final report." Mr. Brown suggested that Mr. Harper provide the documents to the entities and individuals listed in the ordinance governing distribution of the peer review report. He agreed.

Mr. Rodgers noted that career advancement in his office could be facilitated during the restructuring of the OIG.

Mr. Ricks clarified that Mr. Harper intended to publish on the website the management letter and that he would do so consistently.

Mr. Harper reported that he has been reactivated "certified inspector general." At a recent national conference, he had the benefit of meeting with inspectors general from all over the country from all different practice centers. Mr. Harper reported that Ms. Morales taught a cybersecurity course at the conference, and Erica Smith taught an investigations course.

Mr. Harper reported that after six months on the job, he has observed a "reservoir of respect" in the community for the OIG. He plans to continue the good work of the office.

Mr. Brown emphasized the importance of producing to the ERB a "Work Plan" from the OIG by September 1, 2018 and complimented the OIG for committing to meet that deadline even though he has only been on the job for six months.

Mr. Ricks discussed whether the Work Plan should be confidential. Mr. Harper responded that the Work Plan will be very general and will not compromise any investigation.

Mr. Brown asked whether the OIG has filled the Deputy Inspector General for Audit position and the General Counsel position. Mr. Harper expects to start interviewing for the audit position in the next few weeks. He expects to interview General Counsel applicants soon. Mr. Harper noted that he accepted the resignation of Howard Schwartz as Deputy IG for Investigations; Mr. Bonnie will serve as an interim deputy.

Mr. Brown asked about the S&WB, the issues associated with the S&WB's operations, and whether an embedded auditor is a possibility. Mr. Harper reported that he has had meetings with the staff at the S&WB to discuss the billing system at the S&WB. He has asked for an early meeting with the new permanent director of the S&WB after Labor Day. He says he is being "vigilant" but he does not want to interfere with other serious investigations by other agencies that are underway. Mr. Harper said his Work Plan will have S&WB matters, but the Work Plan will describe those projects and investigations at a "very high level" of generality.

3. Report of the Office of Independent Police Monitor (Chair).

Susan Hutson appeared on behalf of the Office of Independent Police Monitor.

Ms. Hutson thanked Mr. Allen and Mr. Brown for their leadership in the past administration.

Ms. Hutson reported her statistics. This report was contained in a document emailed to the board prior to the meeting and attached to these minutes.

Ms. Calderon asked why concerns from officers on the rise. Ms. Hutson explained that these concerns arise from officers who are the subject of retaliation cases. Those officers want "outside eyes" on the proceeding.

Ms. Hutson reported that she received 29 applications for Deputy Police Monitor. She has hired Stella Zement as the Deputy Police Monitor. She also hired Bonceal LNU Deputy Director of Community Relations.

Ms. Hutson reported that she is not hiring an auditor and her office will only be doing reviews and not formal audits. This is because no one other than her is qualified to do so. Mr. Ricks expressed concern over this change of focus given the importance of auditing to spot widespread issues. Ms. Hutson says she has been frustrated with the searches for auditors. So, for "right now" she does not have a quality employee for this work.

Mr. Brown reported that at the next meeting the ERB will consider only one item—the OIPM Annual Report for 2017. He also noted that in the spring he would like the board to do the same thing for the OIG. There was no objection from the board. The board voted and unanimously approved that agenda in principle.

Ms. Hutson reported on access to NOPD data. Her office can access many of the data bases for arrests, FIC, evidence.com, and NOPD.org. The Insight early-warning system still is not fully accessible; she will resolve the issues with the NOPD. The ADP system is still not accessible. The IE Pro system and the NOPD training system are not accessible; she is working on these. She also needs to work on access to MAX, which is used by NOPD supervisors to manage the department; she will work on access tomorrow. The curated dispatch system also was not accessible. Five of 12 databases are up and running though.

Mr. Brown asked about a formal MOU between NOPD and the OIPM. Ms. Hutson says she needs her IT personnel to give her more information. She is trying to push this forward. There are also communications differences between NOPD and OIPM IT personnel. Ms. Hutson reported that the ERB's efforts "broke log jams." Mr. Brown

offered the assistance of the ERB in getting full data access. He asked the IPM to set at least an informal deadline for getting this MOU done.

Ms. Hutson reported on a new database that went on line for complaint intake. It has been on line since August. It is custom built.

Ms. Hutson went to the training advisory committee meeting under the consent decree. This was the first time her office was invited. Her office had good input and was well received. She reported that the NOPD has a good training plan for next year.

Mr. Rodgers asked about whether the OIPM has monitored a recent internal investigation on a shooting involving two officers. She reported that it is an open criminal investigation, and that her office is not yet actively monitoring it.

4. Annual Quality Assurance Review of OIG and OIPM (Chair).

Mr. Brown noted that the Quality Assurance Review ("QAR") committee for the OIG needs to be fully staffed with appointees so that the process can be in place. The report of the committee is due by May 31st of each year. He reported that he will contact the City Council and the Mayor's office to confirm or to obtain appointments so that this committee can be properly constituted.

A separate QAR committee for the OIPM needs to be created and staffed with appointees. Mr. Brown has asked Ms. Calderon to search for an appointee from the ERB.

Ms. Calderon reported that she conducted a search and recommends Dr. Marcus M. Kondkar, Ph.D. He is a faculty member at Loyola University New Orleans, he is domiciled in New Orleans, and is otherwise well qualified. Mr. Brown reported that Dr. Cowan knows the nominee from the university and supports him. Ms. Calderon moved to appoint Dr. Kondkar as the ERB's appointment to the OIPB QAR Committee; Dr. Ricks seconded her motion. The motion carried unanimously, and Dr. Kondkar was appointed to the committee.

5. Ethics Education Training Report (Chair).

Mr. Brown read a written report from the Hackett Group into the record. (Ms. Hackett was unable to attend the meeting.) The written report noted that the Hackett Group is scheduling ethics educational sessions for the S&WB, the mayor's office, and, the NOLA Business Alliance.

The written reported noted that as to the "special project" involving liaisons, two meetings have been scheduled at City Hall with liaisons for August 30-31, 2018. Mr. Brown noted that liaisons have been appointed as to most city departments. Mr. Brown noted the importance of appointing and engaging liaisons to foster a culture of compliance in city government. Mr. Brown reported that the trainers intend to wrap up the special project in October 2018.

Mr. Ricks asked about the status of renewal of the Hackett Group's contract. Mr. Brown will consult with Ms. Hackett and Mr. Ciolino on that issue.

5. Adjournment (Chair).

At 4:30 p.m., Mr. Ricks moved to adjourn the meeting; Mr. Rodgers seconded the motion. The motion carried unanimously and the meeting adjourned.



Association of Inspectors General 524 West 59th Street, 3532N New York, New York 10018

June 11, 2018

Derry Harper Inspector General New Orleans Office of Inspector General 525 St. Charles Ave New Orleans, LA 70130

Dear Inspector General Harper,

The Association of Inspectors General (AIG) performed a Peer Review of the New Orleans Office of Inspector General (NOLA OIG) Audit Division (AD), Investigations Division (ID), and Inspections and Evaluations Division (I&E) at your request. The Peer Review Team (Team) evaluated the work of these three Divisions covering the last three years (January 1, 2015 through December 31, 2017). The Team performed the review during the week of June 4, 2018 through June 7, 2018, which took place at your offices at 525 St. Charles Ave, New Orleans, LA 70130. The Peer Review assessed the work of the AD, ID, and I&E Divisions for compliance with the AIG Principles and Standards for Offices of Inspector General (Green Book) and/or the Government Auditing Standards (Yellow Book) issued by the U. S. Government Accountability Office (GAO). These standards are consistent with the qualitative standards under which your office's AD, ID, and I&E Divisions have operated throughout the review period.

The three-person Peer Review Team consisted of the following individuals:

Team Lead Flora Tran, Regional Investigator/Accreditation Manager I&E Review Office of Inspector General, Florida Department of Children

And Families

AD Review Edyth Porter-Stanley, Forensic Auditor

Office of Inspector General, City of Detroit

ID Review James Mazer, Supervisory Special Agent

Office of Inspector General, Miami-Dade County

On behalf of the Team, I am pleased to advise that we found no reportable instances of failure to meet these standards. There are no limitations or qualifications on our

Inspector General Derry Harper Peer Review Opinion Letter June 11, 2018

opinion. It is the unanimous conclusion of the Team that the AD, ID, and I&E Divisions met all relevant AIG and GAO standards for the period under review.

The remainder of this letter sets forth the purpose, scope, and methodology of the Peer Review.

Purpose

The Team conducted an independent, qualitative review of the operations of the AD, ID, and I&E Divisions of the NOLA OIG, focusing on compliance with agreed-upon standards.

Scope

The Peer Review covered AD, ID, and I&E operations, resulting work products, and related file materials chosen from closed investigations and completed inspections between January 1, 2015 and December 31, 2017. The Peer Review's scope also covered each of the Divisions' compliance with their relevant policy and process manuals and procedural guides; staff qualifications; and professional training requirements. Lastly, the Peer Review assessed supervisory review and quality control over the work product, reporting of results, and the NOLA OIG's relationship and communications with outside agencies. For this last step, the Peer Review Team met with external stakeholders with whom the NOLA OIG frequently work, or who are the recipients of the NOLA OIG work products.

Method

The Peer Review Team generally followed the Peer Review/Qualitative Assessment Review Checklists developed for AD, ID, and I&E Divisions. These Checklists are based on the AIG and GAO Quality Standards. The Team also called upon their own professional experience as senior managers of various Offices of Inspectors General and through their knowledge of and familiarity with best practices within the Inspector General community.

Prior to the actual on-site review, the Team requested information from the AD, ID, and I&E Divisions, including but not limited to policy and procedures manuals, closed case logs, a list of issued reports, and a list of external stakeholders. The Team used this information to select the work products and related case materials that were ultimately reviewed.

On June 4, 2018, the Team held an entrance conference with you and your executive leadership, during which time we explained the Peer Review scope, methodology, limitations, and proposed schedule. During that afternoon, we also delivered our request for sample review materials. During the week, the Peer Reviewers conducted their fieldwork through examination of the selected case files. Peer Reviewers also



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interviewed staff from AD, ID, and I&E. Interviewees for all three Divisions included the Assistant Inspector General (AIG) and Deputy Inspector General (DIG); and the respective Division staff. Members of the ID Peer Review Team also interviewed staff members responsible for Information Technology.

The Team also reviewed the personnel files of current AD, ID, and I&E employees and reviewed their Resumes, Training and Continuing Education files, and all relevant policy and process manuals and procedural guides. All file requests were met fully and timely.

Team members also met with you and with members of your executive leadership to gauge their involvement and interaction with AD, ID, and I&E.

- Howard Schwartz, Assistant Inspector General
- Lance Cardwell, General Counsel (Interim)
- Erica Smith, Deputy Inspector General of Audit
- Rebecca Mowbray, Deputy Inspector General of Inspections & Evaluations (Interim)
- William Bonney, Deputy Inspector General of Investigations

The Team conducted all interviews in confidence and without any limitation on scope or time. Reviewers requested follow-up interviews and explanations, as well as any supplemental documentation, and NOLA OIG staff graciously accommodated the Team.

The two Peer Review Teams also independently chose several external stakeholders to interview. Meetings were arranged between the Peer Reviewers and the external stakeholders for the purpose of evaluating agency cooperation, effectiveness, and responsiveness. Stakeholders included representatives from the:

- New Orleans Police Department
- District Attorney's Office
- City of New Orleans Ethics Review Board

Finally, the Team held an exit conference with you and your executive leadership on June 7, 2018, during which time the Team shared its conclusion that all three Divisions fully met the applicable AIG and/or GAO standards. Team members provided you with our observations and opinions gathered during the review. We held separate exit conferences with the respective Assistant Inspector General and/or Deputy Inspector General of each Division. During each of these exit conferences, Peer Review Team members elaborated on the observations made during the week of review. In each of the exit conferences, Team members provided several observations that did not limit or

Inspector General Derry Harper Peer Review Opinion Letter June 11, 2018

qualify the opinion of the Peer Review, but were shared with you and your leadership team as possible areas of consideration going forward. Throughout the week, we had productive discussions with NOLA OIG members (from the leadership to professional staff) regarding their positive experiences from past Peer Reviews and their affirming opinions about the Peer Review process.

As noted above, it is the unanimous conclusion of the Peer Review Team that the AD, ID, and I&E Divisions met all current and relevant AIG and/or GAO standards for the review period.

On behalf of the AIG, I want to thank you for the confidence placed in the Association by requesting that we conduct this review. On behalf of the Peer Review Team, we would like to acknowledge and thank Inspector General Derry Harper, as well as his designee, Assistant Inspector General for Investigations Howard Schwartz, for all of his efforts in the coordination and planning of this event and for ensuring that we were provided with the necessary records and tools for a thorough and smooth review. Lastly, on behalf of the Team, we would like to recognize that in all of our interactions with your staff, we were shown the respect and cooperation that is the hallmark of a professional staff truly interested in a full and open review of their work. At the same time, this has been a learning experience for each member of the Peer Review Team, for which we wish to convey our sincerest thanks.

Please feel free to contact me or any member of the Peer Review Team if you have any questions.

Yours truly,

Flora Tran, Team Leader, AIG Peer Review for New Orleans Office of Inspector General, June 2018

Peer Review Committee, Association of Inspectors General

CC:

James Mazer, Team Member, AIG Peer Review for New Orleans Office of Inspector General, June 2018

Edyth Porter-Stanley, Team Member, AIG Peer Review for New Orleans Office of Inspector General, June 2018



Association of Inspectors General 524 West 59th Street, 3532N New York, New York 10018

July 16, 2018

Derry Harper Inspector General New Orleans Office of Inspector General 525 St. Charles Ave New Orleans, LA 70130

Dear Inspector General Harper,

On behalf of the Association of Inspectors General's (AIG's) Peer Review Team (Team), I am writing to share with you some observations we made when we were at your offices from June 4, 2018 through June 8, 2018. The Peer Review Team (the Team) was invited to conduct a Peer Review of your organization's Audit Division (AD), Investigations Division (ID), and Inspections and Evaluations Division (I&E).

The Team unanimously concluded that all three Divisions of the New Orleans Office of Inspector General (OIG) complied with the standards set by the Association of Inspectors General (AIG) Principles and Standards for Offices of Inspector General and/or the United States Government Accountability Office (GAO) Government Auditing Standards. An earlier letter dated June 11, 2018, provided this unqualified opinion. The purpose of the present letter is to provide the comments shared with you and your executive staff during the exit conference that took place on June 7, 2018.

On June 7, 2018, the Team met with you and your executive leadership. We provided you with our general conclusion regarding compliance, and noted several areas of distinction and consideration regarding the Divisions. We met separately with your Assistant Inspectors General (AIG) and/or Deputy Inspectors General (DIG) for AD, ID, and I&E. In general, the same comments were shared in those, although more operational detail and operating considerations may have been provided to assist your executive team with their functional responsibilities.

The remainder of this letter will address Division-specific areas of distinction and consideration. These comments are based on the direct observations of the Team members assigned to review the Division; Team member interviews with external

Inspector General Derry Harper Peer Review Management Letter July 16, 2018

stakeholders; interviews with Division staff, including interviews with the AIG and/or DIG of each Division; case file reviews; review of Divisional administrative and operating materials; and the professional judgment and experience of the Peer Reviewer. Once again nothing in this management letter diminishes the Team's unanimous conclusion that the AD, ID, and I&E Divisions met the applicable standards for the period under review.

Overall – Areas of Distinction

- Experienced and Well-Trained Staff: OIG staff possess a wealth of experience and commendable education and certifications. During the Peer Review period, staff overwhelmingly exceeded the minimum training requirements.
- External Relationships: The Peer Review Team met with representatives from the City of New Orleans Police Department, City of New Orleans District Attorney's Office, and the Ethics Review Board. All were very complimentary of the working relationship with the OIG.
- Peer Review Follow-Up: Since the last Peer Review in 2015, the OIG took every area of consideration into account and implemented all but two of the Peer Review Team's recommendations. It is noted that the two recommendations not implemented were no longer necessary during this review.

Overall – Areas of Consideration

Career Advancement: As mentioned previously, the OIG is fortunate to have a team
comprised of individuals with a wealth of experience and knowledge. During the
Peer Review there were discussions regarding limited promotional opportunities and
pay raises within the office. While these are issues that affect many small offices,
the OIG should consider reviewing its structure to identify where potential growth
and/or expansion is possible for career development.

Audit Division – Areas of Distinction

- Shared Goals: The AD exhibited a great willingness to contribute to the overall success of the office by working with I&E to establish a joint risk assessment template. In addition, they provide assistance to ID by providing compilation and audit skills necessary to quantify and qualify evidence for litigation.
- Focus on Fraud: The AD incorporates one of the primary purposes of the Inspector General community by including an internally developed fraud questionnaires for consideration during the planning stage of audits.

Inspector General Derry Harper Peer Review Management Letter July 16, 2018

 Communication: The AD includes an audit summary in the OIG in Brief for each engagement, which concisely describes the engagement and its related findings. This concise reporting tool is evidence of the division's commitment to disseminating valuable information effectively and efficiently.

Audit Division – Areas of Consideration

- Detailed Training Guidelines: The AD met all training requirements on a continual basis to fortify the AD's training efforts and maintain compliance with Generally Accepted Government Auditing Standards (GAGAS 3.76). Although the Audit Manual included CPE required by GAGAS, the AD should consider updating the Audit Manual to also include specific language requiring auditors to align their CPE training with the certifications they hold (i.e. CPAs, CFEs, etc.). The AD staff is highly certified and it is important the training they receive supports the benefits the office gains from these certifications.
- Confirmation of Supervisory Review: The engagement binder contained evidence of supervisory reviews, which included multiple sign-offs on each workpaper. Although AD electronically maintains the cleared review notes on a secured network drive, AD should consider uploading the cleared notes to the Engagement System.
- Documentation of Agreed Upon Procedures: GAGAS 5.63 indicates, "Due to the objective and public accountability of GAGAS agreed-upon procedures engagements, additional consideration for agreed-upon procedure engagements in accordance with GAGAS may apply. These considerations relate to (a) establishing an understanding regarding services to be performed; and (b) reporting on agreed-upon procedure engagements." AD, ID, and I&E should consider developing formalized documents outlining the objectives, scope, and expected deliverables related to non-audit procedures that AD performs for either ID or I&E.

Investigations Division – Areas of Distinction

- Case File Reviews: While this is not a new practice, investigators commented that
 quarterly case file reviews (three months) have proven to be beneficial. This allows
 management an opportunity to review case file materials with staff, discuss concerns
 and guide the investigation to its ultimate conclusion.
- Commitment to Technology: ID staff possess a wealth of experience and knowledge, which contributes to their successes. One such member serves in a dual role as an investigator and is also a computer forensic specialist, which provides the OIG with the unique ability to tackle complex data mining investigations. The ID understands the importance of technology's role in complex investigations and remains committed to furthering its capabilities in this arena.

Investigations Division – Areas of Consideration

 WingSwept Case Management System (CMTS): CMTS is currently utilized by ID as a central point for electronic case management. While the current ID team has created useful templates and formats for its day-to-day operations, ID should consider using CMTS to its fullest potential (i.e., drop-downs, supervisory reviews, signature lines) as discussed in our management briefing.

Inspections & Evaluations Division – Areas of Distinction

- Risk Assessment/Audit Partnership: I&E staff have partnered with AD to develop a
 Risk Assessment model that will help them stay mission-focused and identify areas
 at greatest risk for potential fraud, waste, or abuse. Having a fully-developed Risk
 Assessment model will help guide projects and balance work throughout the year.
- Relationship Building: Through its leadership, I&E has recognized the need to
 engage City Departments by maintaining, building, and/or creating solid working
 relationships. I&E is in the process of developing different approaches (i.e.,
 preliminary findings) that will further its relationships with City Departments. This is
 a commendable approach that will surely have positive effects.

<u>Inspections & Evaluations Division – Areas of Consideration</u>

- Corrective Action Follow-Up: I&E should consider developing a continual follow-up plan (i.e., 60, 120 days) in order to ensure City Departments address corrective action recommendations.
- Technical Guidance: I&E should consider removing this section from I&E as it is an overall office function and can be utilized to track all OIG activities related to technical guidance, outreach, training, etc.

Lastly, we would like to commend the New Orleans Office of Inspector General on staying mission-focused and remaining steadfast in its duties. The sheer size of the governmental operations that your office oversees and your office's jurisdiction and responsibility are unparalleled by any other local government Inspectors General office. Your office is unique, and as Peer Reviewers, we had an insightful learning experience. We hope that you find our comments helpful and we look forward to continuing to support your organization's needs in the future.

Inspector General Derry Harper Peer Review Management Letter July 16, 2018

Please feel free to contact me or any member of the Peer Review Team if you have any questions.

Yours truly,

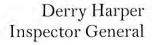
Flora Tran, Team Leader, AIG Peer Review for New Orleans Office of Inspector General, June 2018

Peer Review Committee, Association of Inspectors General

CC:

James Mazer, Team Member, AIG Peer Review for New Orleans Office of Inspector General, June 2018

Edyth Porter-Stanley, Team Member, AIG Peer Review for New Orleans Office of Inspector General, June 2018





August 22, 2018

Flora Tran, AIG Peer Review Team Leader Office of Inspector General Florida Department of Children and Families 375 Commerce Parkway, Suite 101 Rockledge, FL 32955

Dear Ms. Tran:

I want to take this opportunity to again thank you and the members of the Association of Inspectors General Peer Review Team for the valuable feedback provided to the City of New Orleans Office of Inspector General (OIG) as the result of the recent assessment of the OIG's adherence to all applicable professional standards. An external peer review process is critical to the OIG's overall program of quality assurance, and provides the citizens of New Orleans a level of confidence that all OIG activities adhere to the highest standards of professional conduct. We are extremely pleased, as stated in your June 11, 2018 letter, that the OIG's Audit (AD), Inspections and Evaluations (I&E) and Investigations (ID) divisions met all relevant and applicable professional standards during the previous three-year period.

In your July 16, 2018 letter to the OIG you noted ten areas of distinction which highlight the efficiency and effectiveness of existing policies and procedures and six (6) areas of consideration which, if adopted, may enhance or improve current processes. We thank you for noting those areas you concluded were worthy of commendation. In addition, we agree with your recommendations regarding specific areas of consideration and, as set forth below, present the OIG's plan to implement changes designed to enhance existing processes for our AD, I&E, and ID divisions.

Peer Review Area of Consideration: The AD met all training requirements on a continual basis to fortify the AD's training efforts and maintain compliance with Generally Accepted Government Auditing Standards (GAGAS 3.76). Although the Audit Manual included CPE [continuing professional education] required by GAGAS, the AD should consider updating the Audit Manual to also include specific language requiring auditors to align their CPE training with the certifications they hold (i.e. CPAs [Certified Public Accountant], CFEs [Certified Fraud Examiner], etc.). The AD staff is highly

certified and it is important the training they receive supports the benefits the office gains from these certifications.

OIG Response: The AD implemented this recommendation. The AD updated the audit manual to include specific language requiring auditors to obtain CPE in accordance with their certifications. AD staff possess many highly respected certifications, and we fully acknowledge the importance they receive training to maintain certifications, which benefit the quality and validity of the reports issued by the OIG.

Peer Review Area of Consideration: The engagement binder contained evidence of supervisory reviews, which included multiple sign-offs on each workpaper. Although the AD electronically maintains the cleared review notes on a secured network drive, [the] AD should consider uploading the cleared notes to the Engagement System.

OIG Response: The AD implemented this recommendation. The OIG updated the audit manual to require review notes to be maintained in the engagement binder instead of the secured drive. On existing and future engagements, the Audit Division will upload cleared review notes to the Engagement System instead of the secured drive.

Peer Review Area of Consideration: GAGAS 5.63 indicates, "Due to the objective and public accountability of GAGAS agreed-upon procedures engagements, additional consideration for agreed-upon procedure engagements in accordance with GAGAS may apply. These considerations relate to (a) establishing an understanding regarding services to be performed; and (b) reporting on agreed-upon procedure engagements." AD, ID, and I&E should consider developing formalized documents outlining the objectives, scope, and expected deliverables related to non-audit procedures that AD performs for either ID or I&E.

OIG Response: The AD implemented this recommendation. In conjunction with ID and I&E, the AD created an Audit Support Plan. This form will be used to document the objectives, scope, and methodology for any substantial audit support provided to other divisions within the OIG. The OIG also updated the audit manual to ensure this policy is memorialized and that all Audit Division members are aware of the new requirement.

Peer Review Area of Consideration: [Case Management Tracking System] CMTS is currently utilized by ID as a central point for electronic case management. While the current ID team has created useful templates and formats for its day-to-day operations, ID should consider using CMTS to its fullest potential (i.e., drop-downs, supervisory reviews, signature lines) as discussed in our management briefing.

OIG Response: The ID implemented this recommendation. The ID updated our electronic case management system to enable our investigators to access a document templates folder within each open investigation and added an OIG letterhead template to the folder. Although we had access to a document templates folder in previous versions of our electronic case management system, the folder itself did not appear in each open investigation.

The ID enabled the system to populate the investigation case number into the Memorandum of Interview (MOI) template and the Investigative plan for each case. In addition, the ID modified the MOI template to include a space in the document footer to add the initials of the Assistant Inspector General, or other designee, as part of our review process.

Peer Review Area of Consideration: I&E should consider developing a continual follow-up plan (i.e., 60, 120 days) in order to ensure City Departments address corrective action recommendations.

OIG Response: I&E will implement this recommendation. I&E will develop a process to change follow-up reports into a series of regular check-ins with the agency to ensure that solving problems identified by OIG reports remain a priority. Once we develop a formal process for continuous follow-up, we will include the new approach in the new I&E manual to ensure this policy is memorialized and that all I&E members are aware of this revised process.

Peer Review Area of Consideration: I&E should consider removing [the technical assistance] section from [the] I&E [manual] as it is an overall office function and can be utilized to track all OIG activities related to technical guidance, outreach, training, etc.

OIG Response: I&E will implement this recommendation. I&E will remove "technical assistance" as a project category in the new I&E manual. Additionally, the Inspector General, General Counsel, and division heads will develop a plan on how to institutionalize technical assistance to outside agencies as a general OIG function that can be carried out by any OIG department.

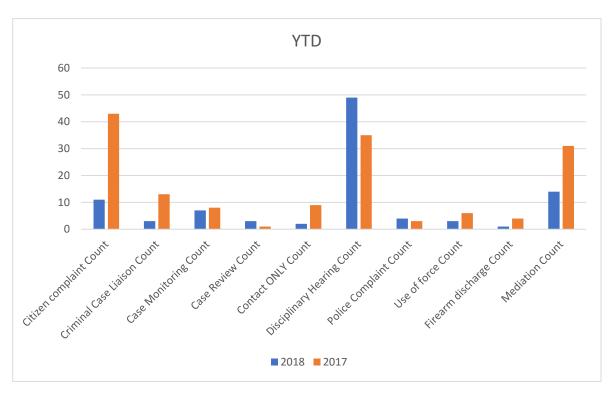
We appreciate all of the information provided to us during the peer review process. If you have any additional comments or questions, please do not hesitate to contact me.

Sincerely,

Derry Harper Inspector General cc: James Mazer, AIG Peer Review Team Member Edyth Porter-Stanley, AIG Peer Review Team Member City of New Orleans Ethics Review Board

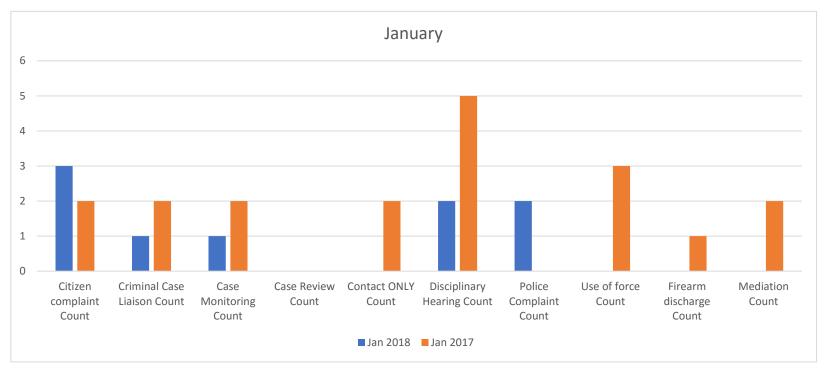


	2018	2017
Citizen complaint Count	11	43
Criminal Case Liaison Count	3	13
Case Monitoring Count	7	8
Case Review Count	3	1
Contact ONLY Count	2	9
Disciplinary Hearing Count	49	35
Police Complaint Count	4	3
Use of force Count	3	6
Firearm discharge Count	1	4
Mediation Count	14	31
Grand Total	97	153



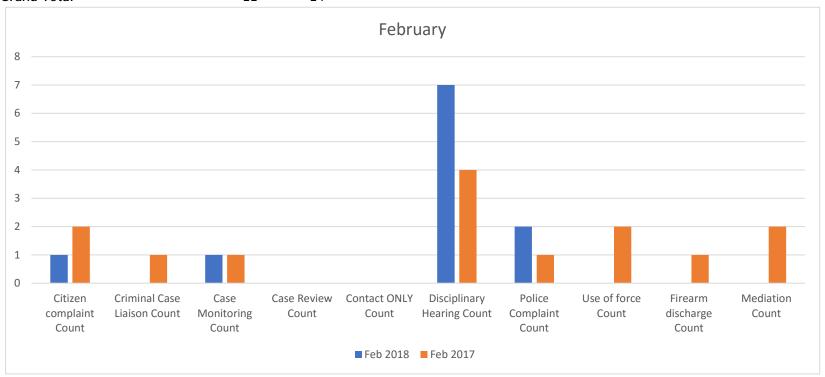


	Jan 2018	Jan 2017
Citizen complaint Count	3	2
Criminal Case Liaison Count	1	2
Case Monitoring Count	1	2
Case Review Count	0	0
Contact ONLY Count	0	2
Disciplinary Hearing Count	2	5
Police Complaint Count	2	0
Use of force Count	0	3
Firearm discharge Count	0	1
Mediation Count	0	2
Grand Total	9	19



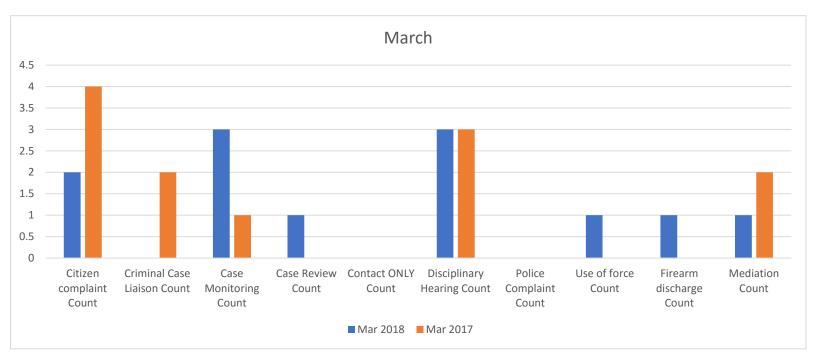


Feb 2018	Feb 2017
1	2
0	1
1	1
0	0
0	0
7	4
2	1
0	2
0	1
0	2
11	14
	0 1 0 0 7 2 0 0



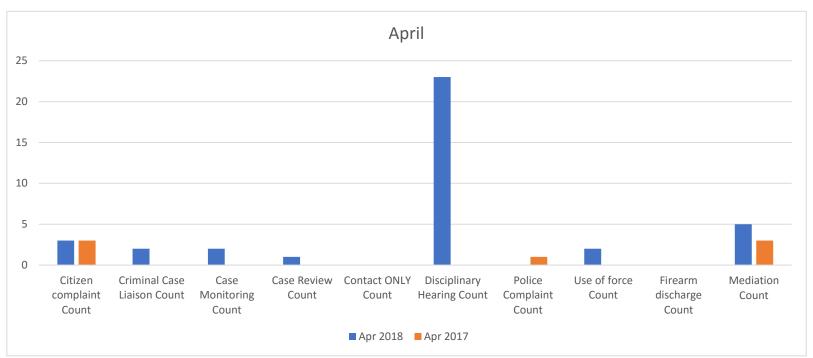


	Mar 2018	Mar 2017
Citizen complaint Count	2	4
Criminal Case Liaison Count	0	2
Case Monitoring Count	3	1
Case Review Count	1	0
Contact ONLY Count	0	0
Disciplinary Hearing Count	3	3
Police Complaint Count	0	0
Use of force Count	1	0
Firearm discharge Count	1	0
Mediation Count	1	2
Grand Total	12	12



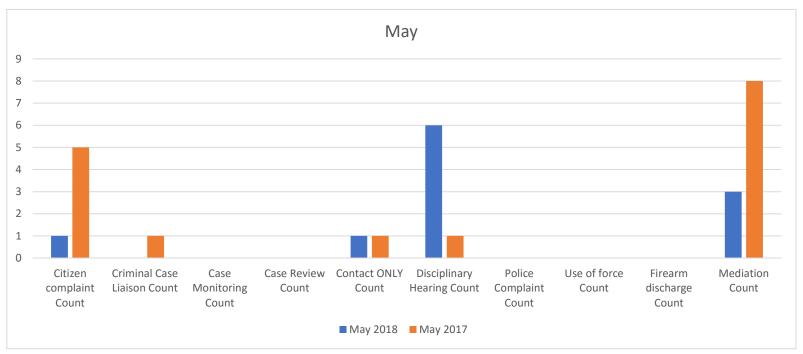


	Apr 2018	Apr 2017
Citizen complaint Count	3	3
Criminal Case Liaison Count	2	0
Case Monitoring Count	2	0
Case Review Count	1	0
Contact ONLY Count	0	0
Disciplinary Hearing Count	23	0
Police Complaint Count	0	1
Use of force Count	2	0
Firearm discharge Count	0	0
Mediation Count	5	3
Grand Total	38	7



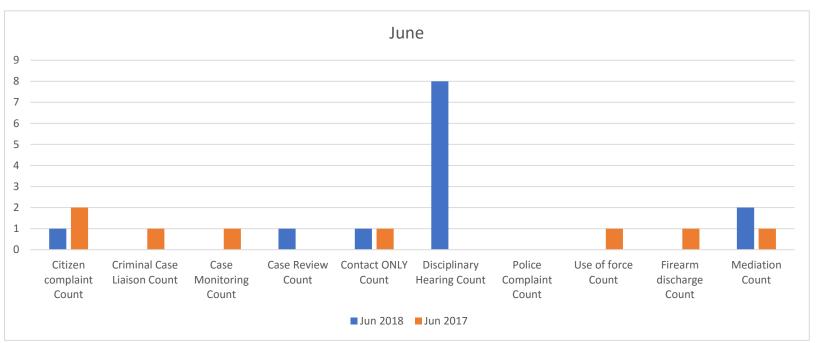


	May 2018	May 2017
Citizen complaint Count	1	5
Criminal Case Liaison Count	0	1
Case Monitoring Count	0	0
Case Review Count	0	0
Contact ONLY Count	1	1
Disciplinary Hearing Count	6	1
Police Complaint Count	0	0
Use of force Count	0	0
Firearm discharge Count	0	0
Mediation Count	3	8
Grand Total	11	16





	Jun 2018	Jun 2017
Citizen complaint Count	1	2
Criminal Case Liaison Count	0	1
Case Monitoring Count	0	1
Case Review Count	1	0
Contact ONLY Count	1	1
Disciplinary Hearing Count	8	0
Police Complaint Count	0	0
Use of force Count	0	1
Firearm discharge Count	0	1
Mediation Count	2	1
Grand Total	13	8





	Jul 2018	Jul 2017
Citizen complaint Count	1	2
Criminal Case Liaison Count	1	3
Case Monitoring Count	2	1
Case Review Count	0	0
Contact ONLY Count	0	0
Disciplinary Hearing Count	3	4
Police Complaint Count	0	0
Use of force Count	0	0
Firearm discharge Count	0	0
Mediation Count	3	3
Grand Total	10	13

