



CITY OF ATLANTA
OFFICE OF THE INSPECTOR GENERAL

COMPLIANCE DIVISION

ANNUAL REPORT

January 2022

From the Inspector General

Last year, in compliance with Atlanta City Charter §8-106(b)(10), I issued the first report on the activities of the newly formed Compliance Division of the Office of the Inspector General (OIG). I had started with the City of Atlanta three weeks prior, and I was the first and only employee of the division. Naturally, that report conveyed little. We have made considerable strides in the year that has followed and this report details that progress.

The report outlines the foundational steps that we have taken to build our new office: developing infrastructure by hiring personnel, securing office space, obtaining resources, and crafting internal governance; cultivating relationships with stakeholders in Atlanta and within the Inspector General community across the country; and establishing lines of communication with City employees, elected officials, and the public to introduce the office, provide anti-corruption education, and facilitate complaints.

Building an office from the ground up presents challenges. Acquiring the common workplace fixtures that one takes for granted—from a website to a photocopier—requires more time and more process than one might imagine. Limitations of the citywide remote work context exacerbate the startup challenges. The Compliance Division has been eager to overcome such obstacles, driven by a sense of urgency to establish the office so the citizens of Atlanta know that we stand ready to fulfill our duty to prevent and detect fraud, waste, abuse, and misconduct. Our team is dedicated to combatting the kind of municipal corruption that precipitated our office, and we hope that with each action we take, we help restore Atlanta's trust in its government.

At points throughout 2021, including during the May budget presentation before City Council, City leaders expressed enthusiasm for this office and for the work that it will perform to benefit the people of Atlanta. There are high hopes and expectations for this new division and we strive every day to further develop our program to meet those expectations. The Compliance Division grew significantly in its inaugural year and I look forward to the continued pace of progress in the year to come.



Shannon K. Manigault
Inspector General

HIRING

Among competing priorities for building the Compliance Division, none was as important as staffing the office. The individuals to be hired for the office would fuel development of the new program; the collective experience, skills, work ethic, and commitment of those staffed would form the foundation for all other progress.

Six positions were originally assigned to the Compliance Division when the office was formed in 2020: an inspector general, a deputy inspector general, an executive assistant, and three investigation managers. By the end of June 2021, each of these positions was filled.

Given the scope of responsibility of the division—prevention and detection of fraud, waste, abuse, and misconduct across Atlanta city government, including all employees, elected officials, and contractors—the OIG sought additional positions during the Fiscal Year 22 budget process. To help drive proactive data-driven investigations and provide analytical support across all investigations, the division sought an investigative data analyst. To help address the day-to-day legal issues that arise for the division, the division sought an investigative attorney. To expand its general investigative capacity and diversify its ranks, the division sought a junior level investigator and a senior level investigator. Recognizing the needs of the division, the Council approved each of the positions sought. This was a promising start for the growth of the division, as it doubled its investigative staff. By the end of November 2021, each of these positions was filled.

As assembled, the Compliance Division reflects decades of experience in investigation, audit, law enforcement, and law, in offices of inspectors general and other compliance and oversight entities from state and local government across the country. Many staff members have obtained certifications that demonstrate their knowledge, motivation, and commitment to the profession. Professional certifications and training acquired by Compliance Division staff members include:

- Certified Inspector General (CIG)
- Certified Inspector General Investigator (CIGI)
- Certified Fraud Examiner (CFE)
- Peace Officer Standards and Training (P.O.S.T.)
- Certified Law Enforcement Officer (CJST Florida)
- Certified Commission for Florida Law Enforcement Accreditation Manager
- Advanced Interviewing Techniques (CIGIE)
- Special Victims Investigator (NYPD)
- Criminal Investigator (NYPD)
- Financial Fraud AFMLS Investigations (DOJ)

INTERNAL GOVERNANCE

With a review of practices in other jurisdictions and based on the team’s collective experience, the Compliance Division has been working to consolidate its internal policies and processes within a comprehensive investigative manual. This manual will guide all future investigations and those currently pending.

OFFICE SPACE

While the City of Atlanta was operating in mandatory telework in January 2021, the OIG sought to secure office space in anticipation of the return to in-person work.

An office of inspector general has particular office space needs. To maintain the confidentiality of ongoing investigations, the Compliance Division required a space that would be walled off from other City departments. No options within City Hall large enough to accommodate the Office of the Inspector General afforded the isolation required for the Compliance Division. The City’s Department of Enterprise Asset Management (DEAM) presented the possibility of housing the OIG in a new City facility at 185 Ted Turner Drive, a space undergoing a complete renovation. By taking this space, the OIG would be able to design the office to specification, incorporating not only the security considerations, but also additional needs of the Compliance Division, such as dedicated space to conduct interviews. The OIG selected this space for the permanent office of the Compliance and Independent Procurement Review Divisions.¹

Because of the time required for construction, the OIG then needed to find temporary space awaiting the completion of 185 Ted Turner Drive. Working with DEAM, the OIG secured temporary space at 98 Mitchell Street, City-leased office space on the ground floor of a residential building near City Hall.

Taking advantage of a confluence of events—full staffing of its originally assigned positions, moving dates for the staff members who relocated to Atlanta, the City’s resumption of in-person operations after the prolonged mandatory telework, and the readiness of the temporary space—the Compliance Division began functioning out of 98 Mitchell Street in June 2021.

Based on forecasts from DEAM, the Compliance Division will move to its permanent space in June 2022.

¹ Please note that the Ethics Division of the Office of the Inspector General, which has been housed in its current location in the ground floor of City Hall for three years, opted to remain in its current space.

COMPLAINT MECHANISMS

For years before the formation of the Office of the Inspector General, the City of Atlanta used a service to field complaints and concerns pertaining to ethics, fraud, waste, and abuse. The City's Integrity Hotline, a 24-hour telephone line staffed by a third-party vendor, provides an around-the-clock option for city employees and members of the public to issue complaints.

Building on this existing infrastructure, the Compliance Division sought to provide additional avenues for City employees and citizens to raise concerns regarding fraud, waste, abuse, and misconduct. The Compliance Division established an email address, inspectorgeneral@atlantaga.gov, where individuals can submit complaints, with attachments as applicable. The Compliance Division established the OIG Tip Line, 404.546.2271, which is staffed by Compliance Division investigators during business hours, to provide direct access to City of Atlanta staff with City government expertise. Finally, the Compliance Division established an online complaint form accessible via the OIG website, atloig.org.

COMMUNICATION

The development of a website was a crucial element of the Office of the Inspector General's buildout. The website would fulfill a number of purposes: announcing the presence of the office, providing details about its function within the City, and offering both a forum and direction for employees and the public to report potential misconduct. Following a protracted process, the OIG launched its own website in October 2021. The independent site (atloig.org) is also accessible through the City of Atlanta website.

With its website established, the OIG turned to its social media presence. The OIG created a Twitter account (@atloig) and Facebook page, enabling the Compliance Division to reach a broader audience to circulate information regarding its case matters and education and outreach efforts.

To most effectively connect with the citizens of Atlanta, however, professional assistance is required. In June 2021, the Compliance Division secured City funding to engage a firm to design and execute a public awareness campaign. Publicizing the OIG is critical to the work of the office: City stakeholders (employees, contractors, members of the public) must know about the function of the OIG and its Compliance Division and understand that they have an avenue to raise concerns regarding misconduct. Public outreach campaigns yield increases in reported complaints; this is vital because industry studies indicate tips are the leading method of fraud detection within organizations. In addition, as awareness of the OIG grows—as Atlanta citizens know that there is an office dedicated to combating corruption—so too should public trust in City government. The procurement process for these marketing services is underway.

EDUCATION

Education forms the cornerstone of the Compliance Division's efforts to combat corruption. As a preventative measure, the Compliance Division seeks to educate City employees and the public about common pitfalls of fraud, waste, abuse, and misconduct. Anti-corruption education includes background regarding the history of the OIG, the role of the OIG and its Compliance Division, and a review of the common issues that arise in the municipal context that yield administrative and criminal sanctions. The Compliance Division laid the foundation of its educational campaign in 2021 with presentations to the heads of all units of City departments, the Atlanta Planning and Advisory Board, and the City's Law Department. Building on that foundation, the Compliance Division will begin a series of anti-corruption lectures in early 2022, ideally capitalizing on offices' resumption of in-person work schedules.

TRAINING²

In addition to educational anti-corruption outreach, the Compliance Division has identified the following areas of concern about which the office proposes to conduct training this year: (1) timekeeping and (2) tone at the top.

The Compliance Division has observed shortcomings in the memorialization of time, including but not limited to inaccuracy of time punches, time schedule deviations, third party clocking, and undocumented overtime. Training surrounding timekeeping would help limit and deter time theft and fraud.

The Compliance Division has identified issues surrounding the tone at the top, a term used to refer to the general ethical atmosphere created by an organization's leadership, across multiple departments.³ Based on Compliance Division observations to date, breakdowns in professionalism from department leaders appear to have contributed to employee misconduct, waste, and fraud, and to have impacted broader employee performance. Training regarding setting a professional work standard and leading by example would help ameliorate these issues.

INVESTIGATIVE RESOURCES

Many tools are necessary to complete an effective investigation. In the past year, the Compliance Division has worked to obtain rudimentary necessities, including general office supplies and equipment, as well as investigative resources: after applying and receiving clearance, the Compliance Division gained access to two leading investigative databases; the division purchased interview equipment; the division secured funding for the purchase of

² Atlanta City Charter §8-106(c) requires the Compliance Division to annually report its "determination of area(s) of greatest concern on which the Inspector General proposes to conduct training during the calendar year of the report for approval by the council."

³ The issue of tone at the top was also flagged by a City Auditor's Office consultant in June 2021 in the context of an audit of transactions and controls during the tenure of former-City of Atlanta Chief Financial Officer James Beard; indeed, one of the consultant's recommendations was that the city engage in tone at the top training.

vehicles for the division to conduct field work; and the division is in the procurement process to secure a case management system to effectively memorialize all complaint and case activity.

STAKEHOLDER OUTREACH

Relationships are critical to the function of an office of inspector general. Teaming with prosecutors allows investigations to yield criminal charges. Partnership with law enforcement entities fosters sharing of ideas and critical investigative resources. Collaboration with elected officials and City department heads facilitates greater understanding of government offices and hastens the identification of corruption vulnerabilities. Outreach with community representatives spreads awareness of the office so that the public knows of the City's outlet to raise issues surrounding municipal fraud, waste, and abuse.

In 2021, the Compliance Division engaged in outreach with each of these stakeholders to the office, developing relationships constituting long term investments in the future of the Compliance Division.

IG COMMUNITY

As a brand new program, the Compliance Division has relied heavily on its connections within the Inspector General (IG) community. The staff of established IG offices at various levels of government provide assistance, precedents, and advice.

The Association of Inspectors General (AIG) is a professional, non-profit organization that supports and advances the professionalism and integrity of IG offices. A standard-bearer of the IG community, the AIG offers resources, certification, and training on core competency areas identified as crucial to IG offices. The OIG is a member of the AIG and is included in its directory of state and local offices of inspector general.

The AIG offers rigorous certification programs that, upon successful completion and examination, yield the credentials of Certified Inspector General Investigator, Certified Inspector General Auditor, Certified Inspector General Inspector/Evaluator, and Certified Inspector General. In August 2021, the Inspector General for the City of Atlanta completed the curriculum and attained the accreditation of Certified Inspector General. In addition to the credential, during this program, the Inspector General forged relationships with federal, state, and local IG offices from across the country.

INVESTIGATION CASE STATISTICS

As noted above, the OIG and its Compliance Division needed to take a number of steps before it was ready to perform its core function, investigations. The statistics set forth below reflect the nascency of the program.

2021 At a Glance

COMPLAINTS	
SOURCE	NUMBER
Integrity Hotline	65
Inspector General Mailbox	8
Verbal Referral	10
OIG Tip Line	0
OIG Website	0
TOTAL	83

CASE INVESTIGATIONS	
STATUS	NUMBER
Active	20
Closed	6
TOTAL	26