ETHICAL PRACTICES BOARD

2019

Annual Report

Minneapolis
City of Lakes

Jacob Frey, Mayor ~ Lisa Bender, City Council President
Walter Bauch, Chair ~ Susan L. Trammell, Ethics Officer

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Introduction

The Ethical Practices Board ("EPB") was created in 2003 with the passage of the City's Ethics in Government Ethics Code ("Ethics Code"), codified at M.C.O. Ch. 15. Section 15.210 of the Ethics Code establishes the EPB and outlines the powers and duties of the EPB, which include issuing advisory opinions and investigating complaints from City employees and members of the public that the Ethics Code has been violated. The Ethics Code sets forth some specific standards which no City official or employee should violate and, as importantly, sets forth aspirations for ethical conduct that go above and beyond the minimum requirements of the Ethics Code.

Further, Ethics Code §15.210(f) states:

> The ethical practices board shall prepare and submit an annual report to the mayor and the city council detailing the ethics activities of the board and the city during the prior year. The format of the report must be designed to maximize public and private understanding of the board and city ethics activities. The report may recommend changes to the text or administration of this Code. The city clerk shall take reasonable steps to ensure wide dissemination and availability of the annual report of the ethical practices board and other ethics information reported by the board.

This annual report is respectfully submitted to the Mayor and to the City Council in response to the requirements of the Ethics Code.

Appointment and Membership

The 2019 members of the EPB were Walter Bauch, Mehmet Konar-Steenberg and JP Hagerty. Walter Bauch was the EPB's 2019 chair.

Walter Bauch was originally appointed to the EPB in August 2010 and is currently serving a term to expire January 2, 2021. Mr. Bauch is a partner with the law firm of Collins, Buckley, Sauntry & Haugh, PLLP, in St. Paul. He practices in the areas of family law, insurance defense and personal injury, business and business litigation, and appellate practice. He is a family law mediator and, since 1994, has served as a Hennepin County Conciliation Court Referee.

JP Hagerty was originally appointed to the EPB in January 2012 and her current term expired on January 2, 2020. Ms. Hagerty is transplant to Minnesota and has been a resident of the Windom Park neighborhood of Northeast Minneapolis for 15 years. She is employed by Wells Fargo as a Business Project Management Vice President. She was previously was employed as a Strategic Project Manager for Allina Health and she held various leadership roles at the University of Minnesota. Ms. Hagerty's credentials include a master's degree in Organizational Leadership from St. Catherine University, a Health Care Compliance Graduate Certificate from Mitchell Hamline's Health Law Institute, a project management certificate from the U of MN, and a bachelor's degree from the UNC Charlotte. Ms. Hagerty has decided not to seek an additional term.

Mehmet Konar-Steenberg was appointed to the EPB in March 2018 and his current term expires January 2, 2021. Mr. Konar-Steenberg is the Briggs & Morgan/Xcel Energy Chair in Energy and Environmental Law at Mitchell Hamline School of Law ("Mitchell Hamline"). At Mitchell Hamline, he oversees the government practice curriculum and teaches administrative law, constitutional law, environmental law, and property law courses. Previously, he both served as a Minnesota assistant attorney general representing the MPCA and the DHS and represented cities and counties through the League of Minnesota Cities and the Minnesota Counties Insurance Trust while in private practice at Greene Espel PLLP.

Ethics Code §15.220 provides that the City Attorney shall designate an assistant city attorney as the City's Ethics Officer. Susan Trammell was designated Ethics Officer in February 2006 and continues to serve in that role.

Mission

The Mission of the Board is to promote integrity in City government by providing the services set forth in Ethics Code §15.210(e). These services include providing interpretations of the Ethics Code, responding to allegations of Ethics Code violations, and providing policy advice to the Ethics Officer.

2019 Accomplishments

I. Ethics Education

Requirements of the Ethics Code

The Ethics Code requires attendance at an ethics education seminar within six months of becoming a local official or employee and every four years thereafter for local officials and every three years thereafter for employees. The Ethics Code states that the education seminars are to be designed and implemented by the Human Resources Department to educate local officials and employees about their duties and responsibilities under the Ethics Code. Department heads are responsible for ensuring that all of their employees attend the required ethics education seminars.

Board and Commission Ethics Code Education

The Ethics Code requires the resident volunteers serving on approximately 50 boards, commissions and advisory committees (collectively "boards") to attend ethics education upon beginning their service and every four years thereafter. A 2009 gift of web-based computerized training permits the board members to participate in the training at their own convenience. The City Clerk's office is automatically notified of the board member's completion of the training when the member reaches the end of the training materials and supplies the member's name and board membership.

The City Clerk's office has moved forward both a spring and a fall orientation for new board members through which it communicates the electronic ethics education requirement to newly appointed members. The City Clerk's office also regularly communicates with board liaisons to remind the appointed members when their refresher training is due. At the time this report was created, only 480 of the 546 appointments were filled. Of the filled memberships, training compliance is at 65%. This is a sharp decrease from the 80% compliance at the end of 2018. Compliance at the end of 2018 was the highest compliance since tracking began in 2009. Efforts will be made to improve the 2020 compliance.

Employee Ethics Code Education: Historical Perspective and Current Statistics

Upon passage of the Ethics Code in March of 2003, a concerted effort was made to provide Ethics Code education to the entire City workforce, the elected officials and the members of the City's boards and commissions. To this end, a videotaped training featuring "Dr. Bill" was produced and the vast majority of covered persons attended ethics education prior to March 31, 2004. Beginning in October 2006, Ethics Officer Susan Trammell began conducting in-person ethics education seminars for city employees, elected officials and the members of the City's boards and commissions. In collaboration with the Human Resources Department Training and Development division ("Training and Development"), a city-wide employee Ethics Code refresher class was offered twice each month through 2012 in conjunction with required Respect in the Workplace education.

In 2019, the Ethics Code was amended to require refresher ethics education every three years for employees instead of every four years. The ordinance change resulted in a large number of regular employees falling out of compliance. Much effort was invested in 2009-2011 to provide ethics education opportunities to employees and remind department heads of the Ethics Code's education requirement and their duty to ensure their employees attend ethics education.

Since 2010, the Board's work plan has included an objective to implement electronic ethics education training for City employees. In 2012, the City Council appropriated $40,000 of 2011 rollover funds for development of electronic-based ethics education refresher training for all city personnel. The Ethics Officer collaborated with staff from the Communications and Information Technology departments to create a new electronic ethics refresher training program which was rolled out to employees in 2013. The thirty-minute electronic training module discusses conflicts of interest, issues related to outside employment, gifts and use of City property. Staff from several departments volunteered to act in the video segments to illustrate ethical issues that employees could face as they perform their duties. The training received a 2014 honorable mention in the National Association of Telecommunications Officers and Advisers' government programming awards.

With the rollout of the electronic training module, employees are no longer required to travel to a classroom location and take the refresher training during pre-set times. The electronic training module was added to COMET's Learning and Development portal in Fall of 2015 for automatic reporting upon electronic training completion. In 2018, in collaboration with the Human Resources Training and Development team, a second-generation electronic training module was developed and rolled out for the next three-year refresher training cycle. This 2018 eLearning module received a 2019 Brandon Hall Group Excellence Award in the category of Best Advance in Custom Content. As of December 31, 2019, 78.1% of employees, regular and seasonal, are compliant with the required Ethics Code education. The percent compliant is consistent with the 77.0% and the 83.1 % compliant for the previous two calendar years.

A ten-minute political activity electronic training module outlining the do's and don'ts employees must follow during election season was completed in summer of 2016. Nearly 100% of employees and all elected officials completed this training in 2016 notwithstanding the COMET technology difficulties. The training module remains active in COMET and employees who want to engage in political activity are encouraged to watch the video. COMET records indicate that the political activity video was accessed 50 times in 2019.

The Ethics Officer, or a designee, presents ethics education at all new employee orientations. In 2019, the Ethics Officer, or a designee, conducted 20 in-person trainings for new employees, new supervisors and elected officials. This in-person training will continue as this Ethical Practices Board strongly believes it is important for those new to the City or assuming new responsibilities to have more intensive training as well as an ethics discourse opportunity. To ensure this in-person education remains a City priority, amendments to the ethics education ordinance provision are proposed.

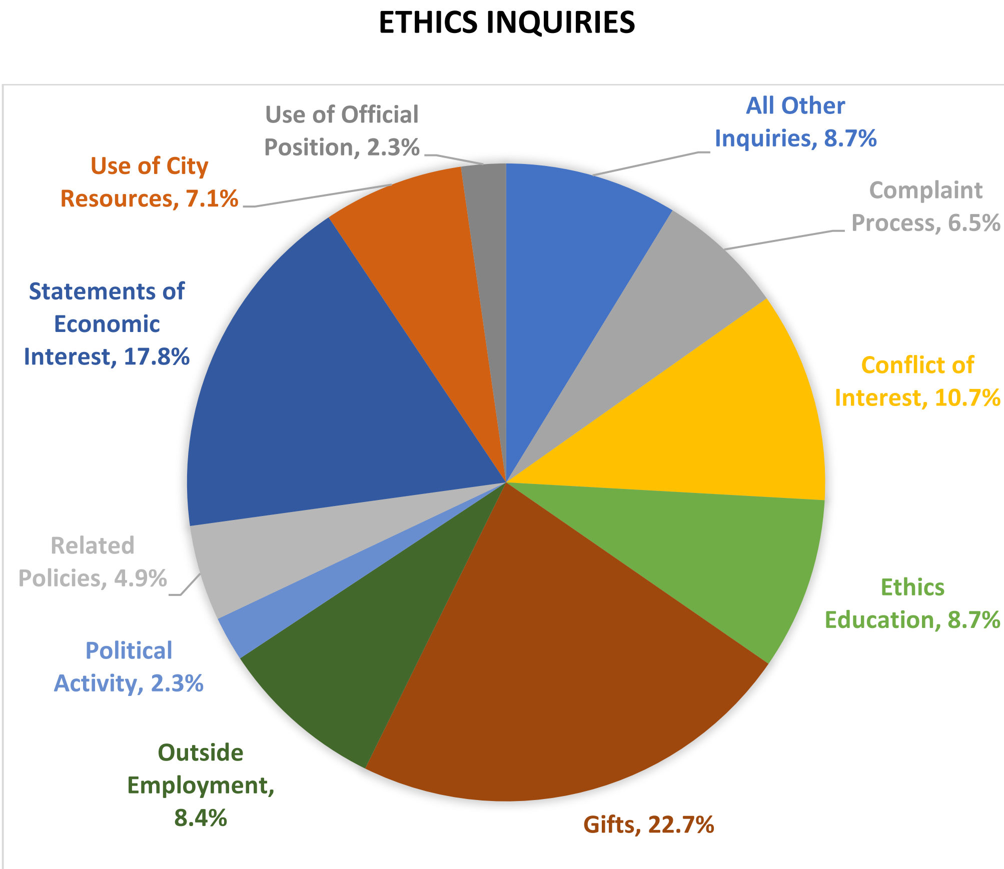
The following chart depicts the Ethics Code education status of the employees of each department.

Employee Ethics Education Status by Department
As of December 31, 2019

Department	COMET Reported Number of Employees	Employees Up to date with Ethics Education	Employees out of Compliance	Refresher Training Due in 2020
311	29	29	0	2
911	80	61	19	3
ASSESSOR	42	41	1	5
ATTORNEY	120	107	13	44
CITY CLERK	112	112	0	4
CITY COORDINATOR	41	32	9	4
CIVIL RIGHTS	35	27	8	3
COMMUNICATIONS	12	4	8	3
COMMUNITY PLANNING & ECONOMIC DEVELOPMENT	198	190	8	166
CONVENTION CENTER	252	244	8	71
EMERGENCY MANAGEMENT	10	10	0	2
FINANCE AND PROPERTY SERVICES	268	250	18	66
FIRE DEPARTMENT	438	406	32	244
HUMAN RESOURCES	60	54	6	5
INFORMATION TECHNOLOGY	91	90	1	32
INTERGOVERNMENTAL RELATIONS	10	5	5	0
INTERNAL AUDIT	3	3	0	1
MAYOR	14	13	1	0
MINNEAPOLIS HEALTH DEPARTMENT	118	105	13	41
NEIGHBORHOOD COMMUNITY RELATIONS	20	18	2	2
POLICE DEPARTMENT	1,084	393	691	114
PUBLIC WORKS	1,136	1,028	108	374
REGULATORY SERVICES	179	177	2	15
Totals	4,352	3,399	953	1,201

II. Ethics Inquiries

From January 1, 2019 through December 31, 2019, the Ethics Officer answered 309 telephone and email inquiries regarding ethics.[1] The number of inquiries decreased slightly from 343 inquiries in 2018. The Board finds it encouraging that so many employees are mindful of the ethical issues and seek guidance when these issues arise in the workplace. The substantive topics of 2019 inquiries were as follows:



The top three categories of inquiries (Gifts, Conflict of Interest and Statements of Economic Interest) changed from 2018 (Conflict of Interest, Gifts and Use of City Resources). Calls related to gifts is once again the most frequent inquiry category. Gifts has been the top inquiry category for 9 of the last 10 years. Most conflict of interest inquiries involve employees' outside employment and board and commission members' professional lives coming before their board or commission. City employee service on non-profit boards raises both conflict of interest and fiduciary duties questions.

[1] Inquiries presented during education sessions and in person immediately after ethics education sessions are not included in the numbers.

The inquiry category "All Other Inquiries" contains all categories of inquiries constituting less than 2.3% of total inquiries. Changes over the years in inquiry percentages are depicted in the following chart:

ETHICS INQUIRIES – HISTORICAL

Category, Ethics Code Section	Percentage Inquiries 2015	Percentage Inquiries 2016	Percentage Inquiries 2017	Percentage Inquiries 2018	Percentage Inquiries 2019
Aspirations, 15.10,15.20,15.130 & 15.180	0.5%	0.8%	0.6%	0.0%	0.6%
Fiduciary Duty, 15.30	0.5%	0.0%	0.6%	0.0%	0.3%
Conflict of Interest, 15.40	12.1%	10.9%	16.9%	13.1%	10.7%
Lobbyists, 15.40(b)(4)	0.0%	0.0%	0.0%	0.0%	0.3%
Gifts, 15.50	27.0%	30.8%	16.6%	21.3%	22.7%
Outside Employment, 15.60	9.3%	4.2%	10.2%	11.1%	8.4%
Post-employment, 15.90	0.0%	1.2%	3.8%	1.4%	1.6%
Use of Official Position, 15.70	1.4%	0.0%	2.9%	4.7%	2.3%
Statements of Economic Interest, 15.80	7.0%	7.4%	7.6%	5.8%	17.8%
Use of City Resources, 15.100	8.8%	12.8%	8.3%	11.4%	7.1%
Political Activity, 15.110	2.3%	7.4%	8.0%	4.1%	2.3%
Loans, 15.120	0.5%	0.8%	0.0%	0.6%	0.6%
Required Reporting, 15.140	0.0%	0.0%	0.0%	0.0%	0.6%
Discrimination / Harassment, 15.150	0.0%	0.4%	0.3%	0.6%	0.0%
Nepotism, 15.160	0.5%	0.8%	1.0%	0.6%	0.0%
Use/disclosure of Information, 15.170	1.4%	0.0%	2.2%	0.9%	0.3%
Bias/Favoritism, 15.190	5.1%	1.6%	2.5%	1.1%	0.3%
Inappropriate Influence, 15.200	0.0%	0.8%	0.6%	0.0%	0.0%
Ethical Practices Board, 15.210	0.9%	1.2%	0.6%	1.4%	1.3%
Complaint Process, 15.230	10.2%	4.7%	5.1%	10.2%	6.5%
Contracts, 15.250	0.5%	1.2%	0.0%	0.0%	0.0%
Ethics Education, 15.260	3.2%	5.6%	4.5%	3.8%	8.7%
Related Policies	6.5%	7.0%	6.1%	4.7%	4.9%
Miscellaneous	2.3%	1.2%	1.6%	3.2%	2.6%

III. Ethics Complaints and Ethics Report Line

Ethics Complaints

In 2019, a total of 39 new complaints alleging 69 allegations were received and 13 complaints were carried over from prior years. The Ethics Officer received 34 complaints alleging 64 violations, either directly or through the Ethics Report Line. Ethics Code §15.230(c) requires a supervisor or department head to notify the Ethics Officer of a report of an alleged Ethics Code violation and the subsequent outcome; this required reporting resulted in an additional 5 reports alleging 5 Ethics Code violations. In addition, the HR Investigative Unit reported an additional 30 complaints.[2]

The complaints were reported by the following methods:[3]

Reporting Method	2013	2014	2015	2016	2017	2018	2019
Ethics Officer	9	8	24	12	17	8	8
Ethics Report Line – Internet	13	18	10	10	14	17	28
Ethics Report Line – Telephone	15	17	19	13	10	3	6
Ethics Report Line – Email	0	10	0	0	0	0	0
Required Reporting by Department	4	32	74	19	4	18	5
311 Reporting	2	0	1	0	0	1	0
Employee Self Reporting	0	1	0	0	0	1	0
Totals	**43**	**86**	**128**	**54**	**45**	**48**	**47**

The historical usage of the Ethics Report Line is as follows:

Year	Ethics Report Line as a Percent of Total Reports
2011	50%
2012	50%
2013	65%
2014	53%
2015	23%
2016	43%
2017	58%
2018	42%
2019	72%

The use of the Ethics Report Line, as a reporting mechanism, has remained fairly constant as a percentage of reports in recent years although filing via internet has steadily replaced calls to the hotline number. The increased 2019 Ethics Report Line usage percentage is attributable to the decreased departmental reporting of ethics violations.

The subject matter of the 68 complaint allegations covered the entire Ethics Code as well as other management concerns.[4]

[2] The Human Resources Investigative unit reported 36 complaints in 2019, including 6 of the discrimination/harassment complaints received via Ethics Report Line. Anti-Discrimination, Harassment & Retaliation ("ADH&R") investigations were conducted for 22 complaints and 14 of the complaints were returned to the applicable departments as non-ADH&R complaints. Only the Ethics Report Line discrimination/harassment complaints are included on the chart on page 9.

[3] Occasionally complaints are reported utilizing multiple reporting mechanisms. For those years in which complainants utilized multiple reporting methods, the reporting method numbers will not equal the number of complaints received.

[4] Some complaints contained more than one allegation so these numbers will not equal the number of complaints received.

Subject Matter, Ethics Code Section	2013	2014	2015	2016	2017	2018	2019
Fiduciary Duty, 15.30	0	2	5	0	0	0	1
Conflict of Interest, 15.40	1	1	2	4	3	2	3
Gifts, 15.50	1	0	1	1	0	2	1
Outside Employment, 15.60	2	1	4	2	6	2	0
Use of Official Position, 15.70	0	4	2	2	5	1	0
Statements of Economic Interest, 15.80	0	0	0	0	0	0	0
Post-employment, 15.90	0	0	0	0	0	0	0
Use of City Property or Resources, 15.100	17	10	21	16	17	20	17
Political Activity, 15.110	1	0	0	1	2	2	1
Loans	0	0	0	0	1	0	0
Required Reporting of Fraud, 15.140	2	1	0	0	4	1	0
Discrimination/Harassment, 15.150[5]	27	14	13	16	10	7	21
Nepotism, 15.160	3	4	2	4	0	1	2
Use/Disclosure of Information, 15.170	3	3	72	1	4	3	7
Bias or Favoritism, 15.190	11	15	9	7	20	14	5
Inappropriate Influence, 15.200	0	2	2	2	1	0	1
Contract Compliance, 15.250	0	1	0	0	0	0	0
Management Issues/Employee Relations	4	1	5	9	5	5	1
Other Policy Violations	0	2	3	0	3	2	6
Compliance with Other Laws	2	3	1	0	0	6	1
Ethical Aspirations, 15.10, 15.20, 15.130, &	1	6	0	6	3	1	2
Other	1	4	6	2	8	4	0

In past years, complaints related to the use of city property and resources have historically been a substantial portion of total complaints. In 2019, 22% of the complaints involved allegations of employee misuse of city property and resources, including employee time and timekeeping. The only category of complaint allegations exceeding allegations of misuse of property and resources category was the discrimination or harassment complaint category. Discrimination or harassment allegations constituted 30% of the total allegations received. If the 30 complaints received directly by HR's ADHR Policy investigators are considered, discrimination and harassment allegations constituted over 50% of the total allegations received.

Discrimination and harassment allegations involving protected classes are investigated by the Human Resources Lead Investigator for violations of the ADH&R Policy whereas discrimination and harassment complaints containing non-protected class allegations are forwarded to the appropriate department for investigation.[6] The HR ADH&R Investigation Unit declined to investigate 71% of the Ethics Code discrimination or harassment allegations alleged pursuant to Ethics Code § 15.150 based upon those complaints not revealing any allegations, which if true, would implicate the ADH&R Policy. In other words, the allegations did not allege discrimination or harassment based upon the specific protected classes set

[5] Does not include the 30 complaints received directly by HR's ADH&R Policy investigators. See footnote 2, *supra.*
[6] See footnote 2, *supra.*

forth in the ADH&R Policy. The discrimination and harassment complaints declined by the ADH&R Investigation Unit are forwarded to the involved department for investigation.[7]

Complaints alleging non-protected class discrimination or harassment may warrant investigation pursuant to the City's Civil Service Rules or Ethics Code § 15.190, bias or favoritism. Civil Service Rules state: "Violence, threats of violence, abusive behavior, abusive language or mental harassment" is an example of misconduct, which may be cause for disciplinary action.[8] Allegations often involve employee performance issues, difficult employee relations situations, or a supervisor or manager favoring a particular employee or group, thereby leaving excluded employees at an unfair disadvantage. Both non-ADH&R and bias and favoritism allegations can be complicated subjects and difficult to prove. Of the 17 non-ADHR discrimination and harassment complaints and the 5 bias or favoritism complaints received in 2019, nearly 80% were closed as unsubstantiated, not action taken. It is important to be aware of this trend in complaints because abusive behavior, abusive language, mental harassment and bias or favoritism at work can be damaging to the City, its employees, and the City's work environment. Policies, procedures and training programs should be reviewed to ensure they are as neutral and objective as possible.

The end-of-the-year status of the 13 carryover complaints and the 39 new 2019 complaints are as follows:[9]

Pending – 7	Discipline imposed – 5
Unsubstantiated, no action taken – 32	Coaching – 6
Department action taken – 13	No jurisdiction – 1
No probable Cause – 2	Closed, no investigation (Rule 7.6) – 3
Complainant failed to cooperate – 4	Administrative Closure – 7

The Ethics Officer has taken the opportunity, while assisting departments with the handling of these complaints, to review and suggest changes to the departments' internal policies. Such reviews and revisions of policies assist departments in avoiding appearances of impropriety and promote a healthy, ethical culture in the City.

Ethics Report Line

The Ethics Report Line has been operational since June 1, 2008. All reports made through the Ethics Report Line are forwarded to the City's Ethics Officer, Susan Trammell. If the report is an ADH&R Policy report, it is also forwarded to the City's Human Resources Lead ADH&R Investigator. If the report is a non-ADH&R Policy allegation, it is also forwarded to the City's Internal Auditor. This process is to ensure no complaint is overlooked. Once received, the reports are forwarded as required by the Ethics Code to the appropriate official for investigation, usually the Department Head and Human Resources Generalist for the applicable department. The Ethics Officer contacts the department periodically to check on the status of the investigation until the complaint is closed.

The Ethics Report Line vendor tracks statistics related to the reports made through its clients' compliance lines.[10]

[7] See footnote 2, *supra.*
[8] Civil Service Rules, Rule 11.03(B)(11).
[9] Some complaints contained more than one outcome so these numbers will not equal the number of complaints received.
[10] NAVEX Global, *2019 Ethics & Compliance Hotline & Incident Management Benchmark Report* (2019).

Original Incident Reports	2016		2017		2018		2019	
	% City	% Vendor Clients	% City	% Vendor Clients	% City	% Vendor Clients	% City	% Vendor Clients
Anonymous Reports	92%	58%	82%	56%	78%	57%	65%	59%
Non-Anonymous Reports	8%	42%	18%	44%	22%	43%	35%	41%
Caller Callbacks	19%	30%	17%	32%	14%	20%	6%	36%

Historically, the City's anonymous reporting has been significantly higher than that of the vendor's other clients and 2019 continued that trend. A lower rate of anonymous reporting is an indicator of trust in the system and the people who manage it. Anonymous callers are instructed to re-contact the hotline after a designated period-of-time to answer any questions the assigned investigator may have for the caller. The importance of calling back is stressed when the Ethics Report Line process is discussed during Ethics Education classes. Calling back is essential for the City to properly investigate anonymous complaints. The City's anonymous callers generally do not re-contact the hotline and failure to do so has resulted in the inability to further investigate some complaints.

IV. Proposed Ordinance Amendments

The Board recommends the following amendment to the Ethics Code:

1. Changes to the Ethics Education provision, § 15.260

The Board recommends amendment of the ethics education section of the Ethics Code. This section was amended in 2016 to allow for eLearning. As previously discussed, the Board feels strongly that active participation and engagement with the Ethics Officer or other designated trainer is vital to a successful ethics education program. While agreeable to the utilization of eLearning for refresher ethics education, the Board maintains the Ethics Officer facilitated initial ethics education is invaluable. The 2016 amendment allowing for eLearning has created a lack of clarity about permissible initial ethics education trainings. This proposed amendment clarifies the ethics education required.

A potential amendment is:

15.260. Ethics Education

~~Each local official or employee shall attend an ethics education seminar within twelve (12) months of the effective date of this Code. New employees and local officials shall participate in an ethics education training within six (6) months of becoming a local official or employee. Employees shall participate in ethics education training every three (3) years thereafter. Non-employee local officials and elected local officials shall participate in an ethics education training every four (4) years thereafter. Employees in the job titles of election judge and stagehand/production technician temporary intermittent are exempt from this education requirement but shall be provided a copy of this Code upon hire. The training shall educate persons as to their duties and responsibilities under this Code. The human resources department shall~~

~~design and implement the ethics education training. Department heads are responsible for ensuring that all of their employees attend this training.~~

The ethics officer, with the assistance of the human resources department, shall design and implement the ethics education training. The training shall educate persons as to their duties and responsibilities under this Code.

(a) *Elected officials*. Each elected official shall participate in trainer-facilitated ethics education training within one (1) month of becoming an elected official and every four (4) years thereafter.

(b) *Employees*. Each employee shall participate in ethics education training in trainer-facilitated ethics education training within three (3) months of becoming an employee and in an eLearning module every three (3) years thereafter. Department heads are responsible for ensuring that all of their employees attend this training.

(c) *Non-employee local officials*. Local officials, as defined in subsection (3) or (4) of that definition in section 15.280 of this Code, shall participate in an eLearning module ethics education training within one (1) month of becoming a local official and every four (4) years thereafter.

(d) *Exemptions*. Employees in the job titles of election judge and stagehand/production technician temporary intermittent are exempt from this education requirement but shall be provided a copy of this Code upon hire.

2. Changes to the Ethics Officer Provision, § 15.2200

The Board continues to recommend amendment to the ethics officer section of the Ethics Code. This amendment was first proposed in this Board's 2016 Annual Report due the new role and job title of the Ethics Officer within the Office of the City Attorney. The proposed changes update the ordinance to reflect the current situation.

A potential amendment is:

15.220. Ethics Officer

The city attorney shall designate an ~~assistant city~~ attorney as the city's ethics officer. The ethics officer shall respond to local official and employee questions about this Code, give opinions on interpretation of this Code, and serve as the staff to the ethical practices board. The ethics officer shall work with the human resources department to design the ethics education seminars required by this Code. The ethics officer shall also work to promote the city's ethics program and high ethical standards in city government. The ethics officer may delegate duties to other attorneys in the Office of the City Attorney. (2003-Or-034, § 1, 3-21-03)

2019 Volunteer Hours

The three members of the Board collectively spent approximately 33 hours on work related to the Board during the 2019 calendar year. This year's business before the Board only necessitated the Board holding bi-monthly meetings. On average, each member spent two hours per meeting on Board-related activities which is slightly less than prior years.

2020 Work Plan
Approved by the Ethical Practices Board – 1/21/2020

The 2020 work plan is predicated on the availability of City staff to complete the tasks requiring staff involvement.

Ethics Education

- Conduct new employee ethics education seminars.
- Consult with departments to determine the ethics education needs of employees and contractors.
- Conduct ethics education seminars for departments as requested.
- Continue collaboration with the City Clerk's office to incorporate the required ethics education into the appointment process.
- Continue collaboration with the City's Communication Department to create a communication strategy to promote awareness of both ethics and the Ethics Report Line.
- Continue collaboration with Human Resources and Information Technology to produce an electronic ethics education game for the next three-year cycle of ethics education.

Ethics Code Review

- Review the City's Ethics Code and propose potential amendments to improve effectiveness of the Code.

Ethical Practices Board Structure

- Research best practices relating to scope of board authority.

Code Interpretation through Policy Recommendations

- Assist departments with policy drafting upon request.

Ethics Inquiries

- Answer Ethics Code inquiries from employees, local officials and the public.

Ethics Complaints and the Ethics Report Line

- Manage complaints received directly as well as from the Ethics Report Line.
- Collaborate with the City's Complaint Protocol Project.

Promote an Ethical Culture in the City of Minneapolis

- Reach out to departments to engage them in discussions about their ethical cultures and ways to improve the culture.