

Memorandum



CITY OF DALLAS

DATE November 14, 2014

TO Honorable Mayor and Members of the City Council

SUBJECT **City of Dallas Ethics Program Update**

On Tuesday, November 14, 2014, the City Council will be briefed on an update of the City of Dallas Ethics Program by Cheryl Orr, Ethics & Diversity Officer. The materials are attached for your review.

If you have any questions, please let me know.


A.C. Gonzalez
City Manager

c: Warren M.S. Ernst, City Attorney
Craig D. Kinton, City Auditor
Rosa A. Rios, City Secretary
Daniel F. Sois, Administrative Judge
Ryan S. Evans, First Assistant City Manager
Eric Campbell, Assistant City Manager

Jill A. Jordan, P.E., Assistant City Manager
Mark McDaniel, Assistant City Manager
Joey Zapata, Assistant City Manager
Jeanne Chipperfield, Chief Financial Officer
Sana Syed, Public Information Officer
Elsa Cantu, Assistant to the City Manager – Mayor & Council

City of Dallas Ethics Program Update



City Council Briefing
November 18, 2014

Overview

- ▶ To provide an update on the Citywide employee Ethics initiative
 - ▶ Citywide Training Update
 - ▶ Current Citywide Ethics Resources - Foundation
 - ▶ Ethics Cycle overview
 - ▶ Ethics Work Plan

Goal: Ethics Program

- ▶ Assure availability to all City employees the resources they need to work effectively in an ethical environment.

Introduction

- ▶ April 2013, City began conducting city-wide ethics training for employees
- ▶ Initially led and conducted by HR and instructors subcontracted through the City's Ethics consultant, Navigant
- ▶ As of June 2014, the Office of Ethics and Diversity responsible for training remainder of employees
- ▶ Training effort completed October 2014

Ethics Training - Data

of City Employees= 12,360

Trained = 11,811 (96%)

	Pre-OED*	Post-OED (5/14/14)	Combined
# of Employees Trained	11,027	784	11,811
Total Cost	\$389,889	\$29,167	\$419,056
Cost per Employee	\$35.36	\$37.20	\$35.48
Avg. Cost per Session	\$1,695	\$729	\$1,552
# of Sessions Held	230	40	270
Avg. Class Size	48	20	34
# of Locations Used	30	11	41

*Pre-Office of Ethics and Diversity

Ethics Training - Survey Results*

- ▶ Majority of respondents strongly approved of the training effort (material and trainers) - 85%
- ▶ Some employees felt ambivalent (neutral) towards the training effort - 11%
- ▶ Limited number of employees questioned the value of the training - 4%

*8,642 surveys completed with 1,120 written comments recorded

Ethics Resources Currently in Place

- ▶ Code of Ethics - 12 A
- ▶ Personnel Rules - Chapter 34
- ▶ Dallas Strategic Plan - (Key Focus Area 6: Obj. 3 Enhance the Culture of Ethics at City Hall)
- ▶ Auditor's Report on the City of Dallas Ethics Program (2/17/2012)
- ▶ Performance Evaluation System - Values and Competencies
- ▶ Strategic Customer Service - Strategic Plan
- ▶ Ongoing Ethics Training - New Employee Orientation
- ▶ WOW Program - One of nine values is "Integrity"
- ▶ Public Safety - Ethics training in curriculum

Citywide Ethical Resource Enhancement Strategies

Ethics Cycle



Prevention

Prevention Activities

- ▶ OED available for information, consultation, and referral
 - ▶ Email: Dallasethics@Dallascityhall.com
 - ▶ Phone: 214-671-9812 or 214-670-1894
 - ▶ Employee Intranet site: <http://cod/ethics/index.htm>
- ▶ Intake Form
 - ▶ Capture and document issues & concerns
 - ▶ Produce data regarding issues
- ▶ Ongoing meetings with departments to present on leadership responsibility regarding ethics in the workplace
 - ▶ September through December 2014
 - ▶ (31 Departments or Offices)
 - ▶ 7 mtgs. completed, 11 scheduled

Prevention Activities

- ▶ Implementation of Auditor's report recommendations
 - ▶ Federal Sentencing Guidelines for Organizations (FSGO)
 - ▶ 7 Program Standards
- ▶ Ethics Measures for FY15 Budget
 - ▶ 75% of EAC members aware of Ethics/Diversity Office
 - ▶ 80% of Focus Group members aware of reporting process

Prevention Activities

- ▶ Ongoing Ethics Training
 - ▶ “Choosing The Ethical Path” - Citywide Training completed
 - ▶ New Employee Orientation
 - ▶ Other opportunities
 - ▶ Ethics videos
 - ▶ Online training
- ▶ Reward/Recognition of ethical behavior
- ▶ Participate in other Citywide training programs
 - ▶ Example: Human Resources Supervisory Training Program

Prevention Activities

- ▶ Ongoing Ethics communication:
 - ▶ Ethics Webpage
 - ▶ Cards and brochures
 - ▶ Email announcements
 - ▶ Meetings with employee groups
- ▶ Identify speakers on Ethical subjects - universities, associations and businesses:
 - ▶ Special Events by the Ethics and Diversity Office
 - ▶ Department Head Meetings

Prevention Activities

- ▶ November 2014, Navigant conducted follow-up focus groups with employees who attended training in 2012
 - ▶ Compare initial feedback on Ethics with current focus groups
- ▶ Retaliation Prevention
- ▶ Ethics Work Plan
 - ▶ Completed through January 2015

Compliance

Compliance

- ▶ Compliance activities currently conducted in the City*:
 - ▶ Field Complaints
 - ▶ Provide Consultation
 - ▶ Conduct Investigations
 - ▶ Write Comprehensive Reports
 - ▶ Recommend Disciplinary Action(s)
 - ▶ Process Grievances
 - ▶ Facilitate Terminations
 - ▶ File Criminal Charges
- ▶ City's Ethics Advisory Commission - Council Appointees

(*Human Resources, City Auditor - Fraud Waste and Abuse Hotline, City Attorney's Office, Fair Housing, Department of Police - Public Integrity Unit, Compliance Office, City Secretary's Office)

Compliance

- ▶ **Ethics and Diversity Office role:**
 - ▶ Regular dialogue with Human Resources' Executive Staff and HR Employee Relations Staff
 - ▶ Monthly meetings with City Auditor's Office - Fraud Waste and Abuse administrator
 - ▶ Collaboration with City Attorney's Office
 - ▶ Consultation to the Ethics Advisory Commission
 - ▶ Upon request, consultation during investigative processes

Correction

Correction

- ▶ Current City Correction Activities:
 - ▶ Provide retraining
 - ▶ Reengineer processes to prevent reoccurrence
 - ▶ Implement disciplinary actions
 - ▶ Review of internal controls
 - ▶ Develop new processes for prevention

Correction

- ▶ Ethics and Diversity Office role:
 - ▶ Provide recommendations on best practices in addressing future/potential ethical issues
 - ▶ Design Ethics awareness programs specifically for department divisions and work units
 - ▶ Available for Departmental consultation on Ethical issues

Ethics Program Summary

- ▶ Opened Office of Ethics and Diversity
- ▶ Completed city-wide ethics training
- ▶ Enhanced Ethics program relating to prevention, correction, and compliance
- ▶ Implemented of on-going training related to ethics
- ▶ Collaborated with Auditor and City Secretary for Ethics compliance activities

Next Steps

- ▶ Finalize Ethics program metrics
- ▶ Design and deliver specialized Ethics training for employees through City University
- ▶ Continue education and communications to City Departments including ongoing communication with the EACs
- ▶ Conclude the Ethic's Audit by complying with recommendations

Questions and Comments?

Ethics and Diversity Office

DallasEthics@Dallascityhall.com

214-671-9812

Appendix

Ethics Training	
DEPT	Trained
AVI	177
BMS	46
CCO	41
CCS	323
CCT	71
CMO	14
CTS	141
CVS	17
DEV	240
DFDC	85
DFDU	1819
DPDC	432
DPDU	3510
DSV	161
DWU	1397
EBS	411
ECO	39
HOU	339
LIB	260
MGT	142
OCA	57
ORM	23
PBW	133
PER	42
P & R	670
PNV	19
POM	38
SAN	454
STS	467
TWM	170
MISC*	73
TOTAL	11811

Federal Sentencing Guidelines for Organizations		
FSGO Element	Description	Rating
1	Establish standards, policies and procedures to prevent and detect unethical or unlawful conduct.	Satisfies
2	Exercise oversight, assign responsibilities and delegate day-to-day operations of ethics and compliance.	Does Not Satisfy
3	Exercise due diligence and avoid delegation of authority of unethical individuals.	Satisfies
4	Communicate and educate individuals on ethics and compliance.	Does Not Satisfy
5	Monitor, audit and evaluate Ethics Program effectiveness periodically, including mechanisms for reporting on ethical misconduct.	Partially Satisfies
6	Enforce ethical standards and design appropriate disciplinary actions.	Partially Satisfies
7	Prevent future occurrences and respond to identified unethical behavior.	Does Not Satisfy

*Employees who voluntarily took the training such as ATT & AUD, etc.

Appendix

Survey Results

Grand Total	Admin	Exec	F/O	Fire	Mgr/Sup	Pol	P/T	Mixed	Total	%
Total Sum of Strongly Agree	4627	649	9899	5346	2689	7721	4832	3800	39563	42
Total Sum of Agree	3321	476	9891	5494	3108	11379	4570	3082	41321	43
Total Sum of Neutral	544	38	2069	1361	476	4517	688	430	10123	11
Total Sum of Disagree	96	13	284	207	50	1236	106	47	2039	2
Total Sum of Strongly Disagree	69	1	274	199	68	1283	45	74	2013	2

Survey Questions

1. This course was worth attending.
2. The training goals were stated and met.
3. The content was easy to follow.
4. The exercises helped me understand the content.
5. I can apply the material I learned.
6. The training met my expectations.
7. The handout, Choosing the Ethical Path, will be useful in my work.
8. The instructor was knowledgeable.
9. The instructor was prepared.
10. Class participation was encouraged
11. We had enough time for the training.