



ETHICAL PRACTICES BOARD

2020

Annual Report



Jacob Frey, Mayor ~ Lisa Bender, City Council President
Mehmet Konar-Steenberg, 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 2020 members of the EPB were Walter Bauch, Mehmet Konar-Steenberg and Kyle Kroll. Mehmet Konar-Steenberg was the EPB's 2020 chair.

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. Mr. Konar-Steenberg was recently appointed to Minnesota's Environmental Quality Board *Enviro* and is subsequently not seeking re-appointment for another term.

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. Mr. Bauch is seeking re-appointment for another term.

Kyle R. Kroll was appointed to the EPB in January 2020 and is currently serving a term to expire in 2023. Mr. Kroll is an attorney at the law firm of Winthrop & Weinstine, P.A. in Minneapolis. He represents businesses in complex commercial litigation, particularly in matters involving class actions, fraud and fiduciary duties, false advertising, intellectual property, and utilities. Prior to his practice, he clerked for federal district court Judge Joan N. Ericksen in the District of Minnesota. In addition to his service on the Board, Mr. Kroll is heavily involved in the Minnesota State Bar Association, Federal Bar Association, and American Bar Association, and he is an adjunct professor at the University of Minnesota Law School. He also volunteers as a judge for collegiate mock trial tournaments.

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.

In Fall of 2020, Matthew Wilcox transferred from the City Attorney's Criminal Division to the Civil Division – Client Services. Mr. Wilcox has a L.L.M in Ethics from the St. Thomas School of Law. Upon his transfer Mr. Wilcox began assisting with the City's ethics related matters.

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.

2020 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 535 of the 661 appointments were filled. Of the filled memberships, training compliance is at 51%. This is a sharp decrease from the 80% and 65% compliance at the end of 2018 and 2019 respectively. Compliance at the end of 2018 was the highest compliance since tracking began in 2009. In late December 2020, there were at least 24 appointments made to city boards and commissions. These appointees have not yet had the opportunity to comply with the ethics education requirement. These late year appointments are impacting the compliance percentage figure. Regardless, efforts will be made to improve the 2021 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.

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.

A new generation of refresher training is created for each three-year education cycle to provide fresh materials each time an employee is required to take the refresher training. The third generation of electronic refresher training is due January 1, 2022. The Human Resources Department has informed the Ethics Officer they do not have the budget to develop a new Ethics training program in 2021 and have postponed the development of the required training until 2022. The Board believes such postponement fails to reflect the ethical values of our city as adopted by the City Council through the Ethics Code's aspirational provisions and urges the City Council to direct the Human Resources to reexamine its training funding priorities.

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 144 times in 2020. The presidential election year undoubtedly contributed to the large number of employee viewings as the 2019 and 2018 viewings were 50 and 44 respectively.

Since adoption of the Ethics Code, the Ethics Officer, or a designee, has presented 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. Prior to COVID-19, the Human Resources Department informed the Ethics Officer that in-person ethics education, including a remote meeting option, would be discontinued for all new employee education beginning May 2020. The 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 and disagrees with the Human Resources Department's decision. The Board will be seeking amendments to the ethics education ordinance provision to ensure in-person education remains a City priority.

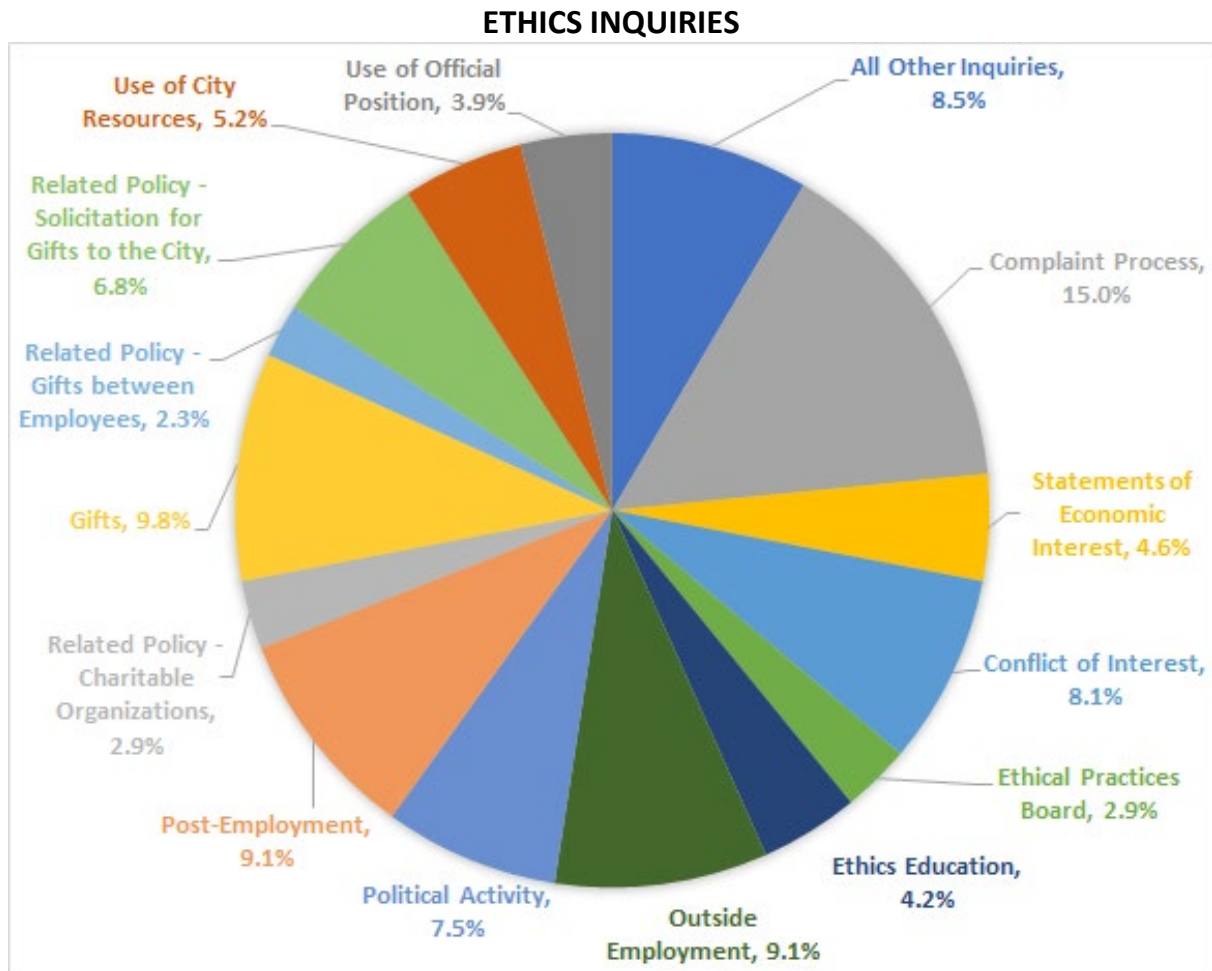
As of December 31, 2020, COMET records show 77.0% of employees, regular and seasonal, are compliant with the required Ethics Code education. The percent compliant is consistent with the 78.1% and the 77.0% compliant for the previous two calendar years. The following chart depicts the Ethics Code education status of the employees of each department according to COMET records.

**Employee Ethics Education Status by Department
As of December 31, 2020**

Department	COMET Reported Number of Employees	Employees Up to date with Ethics Education	Employees out of Compliance	Refresher Training Due in 2020
311	26	26	0	19
911	75	75	0	0
ASSESSOR	35	32	3	4
ATTORNEY	106	96	10	19
CITY CLERK	70	69	1	39
CITY COORDINATOR	30	22	8	3
CIVIL RIGHTS	29	26	3	8
COMMUNICATIONS	14	14	0	0
COMMUNITY PLANNING & ECONOMIC DEVELOPMENT	225	210	15	42
CONVENTION CENTER	112	102	10	3
EMERGENCY MANAGEMENT	9	9	0	1
FINANCE AND PROPERTY SERVICES	263	244	19	37
FIRE DEPARTMENT	423	156	267	20
HUMAN RESOURCES	53	48	5	19
INFORMATION TECHNOLOGY	86	56	30	19
INTERGOVERNMENTAL RELATIONS	5	1	4	0
INTERNAL AUDIT	3	2	1	2
MAYOR	12	11	1	7
MINNEAPOLIS HEALTH DEPARTMENT	110	74	36	22
NEIGHBORHOOD COMMUNITY RELATIONS	18	16	2	5
POLICE DEPARTMENT	928	586	342	8
PUBLIC WORKS	1129	984	145	269
REGULATORY SERVICES	174	171	3	2
Totals	3,935	3,030	905	346

II. Ethics Inquiries

From January 1, 2020 through December 31, 2020, the Ethics Officer answered 307 telephone and email inquiries regarding ethics. The number of inquiries are on par with the 309 inquiries in 2019. 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 2020 inquiries were as follows:



Complaint Process was the top inquiry of the year followed by Gifts and a tie for third between Outside Employment and Post Employment. Gifts was the only category previously ranked as a top three category. (Gifts, Conflict of Interest, and Statements of Economic Interest). Gifts has been a top three inquiry category in each of the last 10 years. Interestingly, inquiries about how the complaint process works requiring responses regarding the required elements for appropriately filing a complaint placed in a top three advice category for the first time. This top three showing was due to a steady stream of inquiries from those interested in filing complaints after the George Floyd protests.

The inquiry category “All Other Inquiries” contains all categories of inquiries constituting less than 2.0% 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 2016	Percentage Inquiries 2017	Percentage Inquiries 2018	Percentage Inquiries 2019	Percentage Inquiries 2020
Aspirations, 15.10,15.20,15.130 & 15.180	0.8%	0.6%	0.0%	0.6%	0.3%
Fiduciary Duty, 15.30	0.0%	0.6%	0.0%	0.3%	1.0%
Conflict of Interest, 15.40	10.9%	16.9%	13.1%	10.7%	8.1%
Lobbyists, 15.40(b)(4)	0.0%	0.0%	0.0%	0.3%	1.6%
Gifts, 15.50	30.8%	16.6%	21.3%	22.7%	9.8%
Outside Employment, 15.60	4.2%	10.2%	11.1%	8.4%	9.1%
Post-employment, 15.90	1.2%	3.8%	1.4%	1.6%	9.1%
Use of Official Position, 15.70	0.0%	2.9%	4.7%	2.3%	3.9%
Statements of Economic Interest, 15.80	7.4%	7.6%	5.8%	17.8%	4.6%
Use of City Resources, 15.100	12.8%	8.3%	11.4%	7.1%	5.2%
Political Activity, 15.110	7.4%	8.0%	4.1%	2.3%	7.5%
Loans, 15.120	0.8%	0.0%	0.6%	0.6%	0.0%
Required Reporting, 15.140	0.0%	0.0%	0.0%	0.6%	0.0%
Discrimination / Harassment, 15.150	0.4%	0.3%	0.6%	0.0%	0.0%
Nepotism, 15.160	0.8%	1.0%	0.6%	0.0%	1.3%
Use/disclosure of Information, 15.170	0.0%	2.2%	0.9%	0.3%	0.3%
Bias/Favoritism, 15.190	1.6%	2.5%	1.1%	0.3%	1.3%
Inappropriate Influence, 15.200	0.8%	0.6%	0.0%	0.0%	0.0%
Ethical Practices Board, 15.210	1.2%	0.6%	1.4%	1.3%	2.9%
Complaint Process, 15.230	4.7%	5.1%	10.2%	6.5%	15.0%
Contracts, 15.250	1.2%	0.0%	0.0%	0.0%	1.0%
Ethics Education, 15.260	5.6%	4.5%	3.8%	8.7%	4.2%
Related Policies - Solicitation of Gifts to the City, Gifts between Employees & Charitable Organizations	7.0%	6.1%	4.7%	4.9%	12.1%
Miscellaneous	1.2%	1.6%	3.2%	2.6%	1.6%

III. Ethics Complaints and Ethics Report Line

Ethics Complaints

In 2020, a total of 54 new complaints alleging 89 allegations were received and 15 complaints were carried over from prior years. The Ethics Officer received 32 complaints alleging 64 violations, either directly or through the Ethics Report Line. Two of the complaints had a combined total of 26 complainants.

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 22 reports alleging 29 violations. In addition, the HR Investigative Unit reported an additional 55 complaints.¹

Complaints were reported using the following methods:²

Reporting Method	2016	2017	2018	2019	2020
Ethics Officer	12	17	8	8	22
Ethics Report Line – Internet	10	14	17	28	29
Ethics Report Line – Telephone	13	10	3	6	12
Required Reporting by Department	19	4	18	5	22
311 Reporting	0	0	1	0	0
Employee Self Reporting	0	0	1	0	0
Totals	54	45	48	47	85

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

Year	Ethics Report Line as a Percent of Total Reports
2016	43%
2017	58%
2018	42%
2019	72%
2020	48%

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 the web 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 that year.

The subject matter of the 89 complaint allegations covered the entire Ethics Code as well as other management concerns.³

¹ The Human Resources Investigative unit reported 55 complaints in 2020, including 15 of the discrimination/harassment complaints received via Ethics Report Line. Anti-Discrimination, Harassment & Retaliation (“ADH&R”) investigations were conducted for 39 complaints and 9 of the complaints were returned to the applicable departments for investigation as non-ADH&R complaints. Only the Ethics Report Line and Ethics Officer discrimination/harassment complaints are included on the chart on page 10.

² 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. As an example, one of this year’s complaints was reported by 17 complainants using the Ethics Report Line, the Ethics Officer and Human Resources as the reporting mechanism. One of the 17 complainants reported the complaint via two reporting mechanisms.

³ Some complaints contained more than one allegation so these numbers will not equal the number of complaints received.

Subject Matter, Ethics Code Section	2014	2015	2016	2017	2018	2019	2020
Fiduciary Duty, 15.30	2	5	0	0	0	1	2
Conflict of Interest, 15.40	1	2	4	3	2	3	3
Gifts, 15.50	0	1	1	0	2	1	0
Outside Employment, 15.60	1	4	2	6	2	0	2
Use of Official Position, 15.70	4	2	2	5	1	0	9
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 Time, 15.100	10	21	16	17	20	17	17
Political Activity, 15.110	0	0	1	2	2	1	2
Loans	0	0	0	1	0	0	0
Required Reporting of Fraud, 15.140	1	0	0	4	1	0	0
Discrimination/Harassment, 15.150	14	13	16	10	7	21	23
Nepotism, 15.160	4	2	4	0	1	2	1
Use/Disclosure of Information, 15.170	3	72	1	4	3	7	10
Bias or Favoritism, 15.190	15	9	7	20	14	5	10
Inappropriate Influence, 15.200	2	2	2	1	0	1	3
Contract Compliance, 15.250	1	0	0	0	0	0	0
Management Issues/Employee Relations	1	5	9	5	5	1	2
Other Policy Violations	2	3	0	3	2	6	1
Compliance with Other Laws	3	1	0	0	6	1	1
Ethical Aspirations, 15.10, 15.20, 15.130, & 15.180	6	0	6	3	1	2	2
Other	4	6	2	8	4	0	1

In past years, complaints related to the use of city property and resources have historically been a substantial portion of total complaints. In 2020, 19% 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 26% of the total allegations received. If the 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.⁴

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.⁵ Allegations often involve employee performance issues, difficult employee relations situations, or a supervisor or manager favoring a

⁴ See footnote 2, *supra*.

⁵ Civil Service Rules, Rule 11.03(B)(11).

particular employee or group, thereby leaving excluded employees at an unfair disadvantage. Both ADH&R and non-ADH&R as well as bias and favoritism allegations can be complicated subjects and difficult to prove. Of the 23 ADHR discrimination and harassment complaints and the 10 bias or favoritism allegations received in 2020, over 80% were closed as unsubstantiated, no 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 7 carryover complaints and the 54 new 2020 complaints are as follows:⁶

Pending – 15	Discipline imposed – 5
Unsubstantiated, no action taken – 16	Coaching – 13
Department action taken – 2	No jurisdiction – 2
No probable Cause – 0	Closed, no investigation (Rule 7.6) – 7
Complainant failed to cooperate – 1	Administrative Closure – 2

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. Reports are also forwarded to the City's Human Resources Lead ADH&R Investigator and 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.⁷

⁶ Some complaints contained more than one outcome so these numbers will not equal the number of complaints received.

⁷ NAVEX Global, *2020 Ethics & Compliance Hotline & Incident Management Benchmark Report* (2020).

Original Incident Reports	2017		2018		2019		2020
	% City	% Vendor Clients	% City	% Vendor Clients	% City	% Vendor Clients	% City
Anonymous Reports	82%	56%	78%	57%	65%	59%	77%
Non-Anonymous Reports	18%	44%	22%	43%	35%	41%	23%
Caller Callbacks	17%	32%	14%	20%	6%	36%	24%

Historically, the City’s anonymous reporting has been significantly higher than that of the vendor’s other clients and it is likely that 2020 continued that trend. As of the publication of this report, the vendor’s 2020 statistics were not available. 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 is not proposing any amendments to the Ethics Code at this time. The Ethics Code has been in effect for nearly 20 years. The Board is of the opinion a comprehensive review of the Ethics Code and a comparative analysis of other Ethics Codes is needed. This review and analysis is included on the 2021 Workplan. The Board anticipates staff will bring forward proposed ordinance changes later in the year when the review and analysis is completed.

2020 Volunteer Hours

The three members of the Board collectively spent approximately 33 hours on work related to the Board during the 2020 calendar year. Due to COVID-19, the Board did not hold its regularly scheduled meetings in March and May. The Board met bi-monthly for the remainder of the year. On average, each member spent 3 hours per meeting on Board related activities.

2021 Work Plan

The 2021 work plan is predicated on the availability of City staff to complete the tasks requiring staff involvement.

Ethics Education

- Pursue conducting new employee ethics education seminars via Teams.
- 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'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

- Comprehensive review of the City's Ethics Code and comparative analysis of other governmental ethics codes.
- Draft proposed 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.