



ETHICAL PRACTICES BOARD

2021

Annual Report



Jacob Frey, Mayor ~ Andrea Jenkins, City Council President
Kyle Kroll, 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 2021 members of the EPB were Walter Bauch, Kyle Kroll and Clinton Collins, Jr. Kyle Kroll was the EPB’s 2021 chair.

Walter Bauch was originally appointed to the EPB in August 2010 and is currently serving a term to expire January 2, 2024. 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 has served as a Hennepin County Conciliation Court Referee since 1994.

Clinton Collins, Jr., was appointed to the EPB in January 2021 to serve a term expiring January 2, 2024. Mr. Collins is a managing attorney with GEICO practicing insurance law. He has served as a member of the Minneapolis Civil Rights Commission, and the board chair of the Minneapolis Urban League. Mr. Collins resigned from the EPB in December 2021 due to relocating outside of the City.

Kyle R. Kroll was appointed to the EPB in January 2021 to serve a term expiring January 2, 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 the Fall of 2020, Matthew Wilcox began assisting with the City's ethics related matters. Mr. Wilcox has a L.L.M in Ethics from the University of St. Thomas School of Law.

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.

2021 Accomplishments

I. Ethics Education

Requirements of the Ethics Code

The Ethics Code requires new local official and employees to attend an ethics education seminar within six months of beginning their term or employment, respectively. A local official must attend the seminar every four years thereafter while employees must attend every three years. 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 ethical duties and responsibilities. Department heads are responsible for ensuring that all of their employees attend the required ethics education seminars.

Board and Commission Ethics Code Education

The City currently has 54 boards, commissions and advisory committees (collectively "boards") to which residents are appointed. The Ethics Code requires the resident volunteers serving on these 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 communicates the 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 487 of the 604 appointments were filled. Of the filled memberships, training compliance is at 79%. This is a sharp increase from the 65% and 51% compliance at the end of 2019 and 2020 respectively. Credit for the improved compliance with training is entirely due to the City Clerk's continuous compliance requirement communications with board members and board liaisons.

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, elected officials and 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. In October 2006, Ethics Officer Susan Trammell began conducting in-person ethics education seminars for city employees, elected officials, and 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 Communications and Information Technology staffs 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 Ethics Code, § 15.260, makes the Human Resources Department responsible for the design and implementation of the ethics education training. The third generation of electronic refresher training was due January 1, 2022, but as noted in this board's 2020 report, a new Ethics training program was not included in the Human Resources Department's 2021 work plan due to budgeting priorities. The Human Resources Department's 2022 work plan does include the third generation of electronic refresher training. The Board remains hopeful the third generation refresher training will be ready for implementation for calendar year 2023.

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. Despite challenges due to COMET technologies, nearly 100% of employees and all elected officials completed this training in 2016. 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 109 times in 2021. The city-wide elections undoubtedly contributed to the large number of employee viewings, as the video was accessed 50 times in 2019 and 144 times in 2020, a presidential election year. The political activity training module was accessed seven times in 2021.

Between 2006 and May of 2020, the Ethics Officer, or a designee, has presented ethics education at all new employee orientations. The Human Resources Department discontinued the new employee in-person and remote ethics education in May 2020. The only in-person ethics education still conducted is the new employee training specifically requested by the Minneapolis Police Department and the Minneapolis Fire Department. In 2021, the Ethics Officer, or a designee, conducted only one in-person trainings for new employees in the Minneapolis Police Department and one ethics overview for newly elected officials. 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 opportunity to discuss ethics questions. As such the Board disagrees with discontinuation of in-person ethics education. The Board will continue to seek a reversal of the Human Resources Department’s decision and will be considering amendments to the ethics education ordinance provision to ensure in-person education remains a City priority.

As of December 31, 2021, COMET records show 81.2% of employees, regular and seasonal, are compliant with the required Ethics Code education. The percent compliant slightly improved over 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.

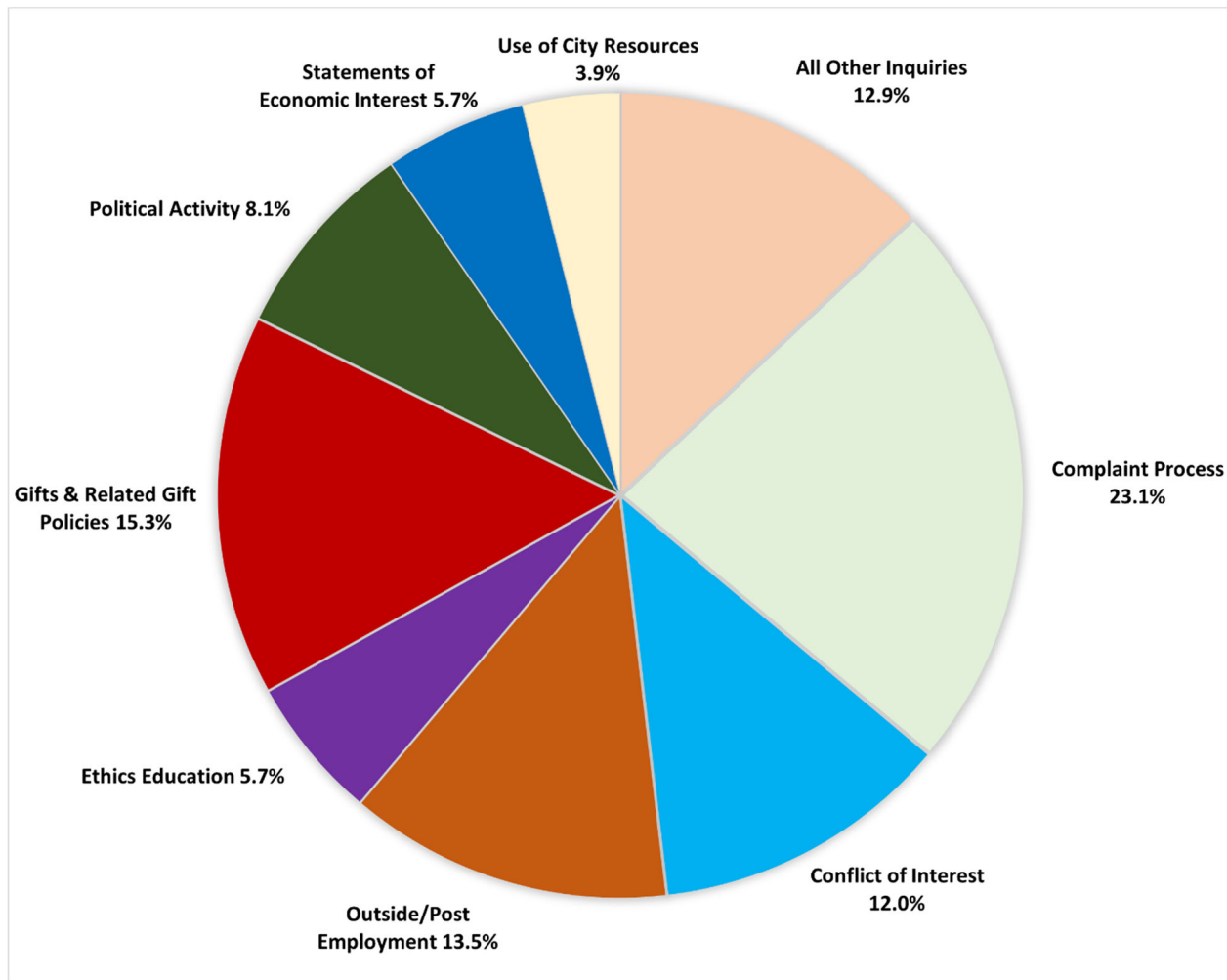
Employee Ethics Education Status by Department As of December 31, 2021

Department	COMET Reported Number of Employees	Up-to-date Ethics Education	Employees out of Compliance	Refresher Training Due in 2022
311	30	20	10	4
911	67	65	2	40
ASSESSOR	34	34	0	18
ATTORNEY	98	80	18	30
CITY CLERK	77	59	18	12
CITY COORDINATOR	27	20	7	8
CIVIL RIGHTS	37	36	1	7
COMMUNICATIONS	14	13	1	1
COMMUNITY PLANNING & ECONOMIC DEVELOPMENT	221	221	0	101
CONVENTION CENTER	130	122	8	1
EMERGENCY MANAGEMENT	10	10	0	3
FINANCE AND PROPERTY SERVICES	265	243	22	89
FIRE DEPARTMENT	404	263	141	92
HUMAN RESOURCES	53	48	5	17
INFORMATION TECHNOLOGY	91	68	23	30
INTERGOVERNMENTAL RELATIONS	5	3	2	1
INTERNAL AUDIT	3	3	0	0
MAYOR	14	13	1	1
MINNEAPOLIS HEALTH DEPARTMENT	157	109	48	33
NEIGHBORHOOD COMMUNITY RELATIONS	28	28	0	10
POLICE DEPARTMENT	755	548	207	145
PUBLIC WORKS	1075	883	192	221
REGULATORY SERVICES	168	168	0	126
Totals	3763	3056	707	990

II. Ethics Inquiries

From January 1, 2021 through December 31, 2021, the Ethics Officer answered 310 telephone and email inquiries regarding ethics. The number of inquiries is on par with the 307 inquiries in 2020. 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 2021 inquiries were as follows:

ETHICS INQUIRIES



Complaint Process was the leading inquiry category of the year, followed by Conflict of Interest and Outside/Post Employment inquiries. 2021 is the second year in a row in which Complaint Process inquiries was the leading advice category. Complaint Process inquiries range from questions regarding “how to file” to what proof is required for a particular Code violation to the necessary requirements for an appropriately filed complaint. Historically, Conflict of Interest and Outside Employment inquiries have consistently comprised a substantial volume of the inquiries and, like 2021, usually were part of the top three categories. Complaint Process replaced Gift inquiries as a top three inquiry category in 2021 when Gift inquiries dropped to fourth. Prior to 2021, Gift inquiries were the most often asked inquiries.

In the above Ethics Inquiries Chart, the inquiry category “All Other Inquiries” contains all categories of inquiries constituting less than 2.0% of total inquiries. The composition of the “All Other Inquiries” category is included in the following chart which depicts the changes over the years in inquiry:

ETHICS INQUIRIES – HISTORICAL

Category, Ethics Code Section	Percentage Inquiries 2018	Percentage Inquiries 2019	Percentage Inquiries 2020	Percentage Inquiries 2021
Aspirations, 15.10,15.20,15.130 & 15.180	0.0%	0.6%	0.3%	0.6%
Fiduciary Duty, 15.30	0.0%	0.3%	1.0%	0.3%
Conflict of Interest, 15.40	13.1%	10.7%	8.1%	12.0%
Lobbyists, 15.40(b)(4)	0.0%	0.3%	1.6%	0.3%
Gifts, 15.50	21.3%	22.7%	9.8%	10.2%
Outside Employment, 15.60	11.1%	8.4%	9.1%	10.8%
Post-employment, 15.90	1.4%	1.6%	9.1%	2.7%
Use of Official Position, 15.70	4.7%	2.3%	3.9%	1.5%
Statements of Economic Interest, 15.80	5.8%	17.8%	4.6%	5.7%
Use of City Resources, 15.100	11.4%	7.1%	5.2%	3.9%
Political Activity, 15.110	4.1%	2.3%	7.5%	8.1%
Loans, 15.120	0.6%	0.6%	0.0%	0.0%
Required Reporting, 15.140	0.0%	0.6%	0.0%	0.0%
Discrimination / Harassment, 15.150	0.6%	0.0%	0.0%	0.0%
Nepotism, 15.160	0.6%	0.0%	1.3%	0.9%
Use/disclosure of Information, 15.170	0.9%	0.3%	0.3%	0.6%
Bias/Favoritism, 15.190	1.1%	0.3%	1.3%	0.9%
Inappropriate Influence, 15.200	0.0%	0.0%	0.0%	0.3%
Ethical Practices Board, 15.210	1.4%	1.3%	2.9%	1.2%
Complaint Process, 15.230	10.2%	6.5%	15.0%	23.1%
Contracts, 15.250	0.0%	0.0%	1.0%	0.3%
Ethics Education, 15.260	3.8%	8.7%	4.2%	5.7%
Related Policies - Solicitation of Gifts to the City, Gifts between Employees & Charitable Organizations	4.7%	4.9%	12.1%	6.0%
Miscellaneous	3.2%	2.6%	1.6%	5.1%

III. Ethics Report Line and Ethics Complaints

Employee Report Line

Maintaining a confidential reporting line for employees to make anonymous reports of their concerns is a well-established best practice. The City's confidential reporting line, the Employee Report Line, has been operational since June 1, 2008. In mid-2021, as a result of a procurement required Request for Proposals, the City switched to a new confidential employee reporting line vendor. The switch was seamless for employees using the Employee Report Line, as the telephone number for making reports did not change and all links to the internet option were updated on CityTalk.

Contemporaneous with the switch to a new vendor, changes were made in the complaint tracking account to more effectively account for situations in which a complainant brings allegations against more than one person. In past years, a complaint with multiple subjects was counted as one complaint with outcomes counted separately only when outcomes differed for the named subjects. Beginning January 1, 2021, each person alleged to have violated an ethics code provision receives a separate complaint number even though the allegations against multiple persons were contained in just one complaint. When multiple complainants file complaints alleging (a) violation(s) against one person, however, the past practice of opening only one complaint is being maintained; those complaints are counted separately only for recording method of filing.

Currently, all reports made through the Employee 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. When reports contain allegations of fraud or misuse of City property, funds or resources, the reports are 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.

Ethics Complaints

In 2021, a total of 87 new complaints containing 114 allegations were received and 18 complaints were carried over from prior years. The 87 total complaints received includes 19 alleged ethics violations reported by City departments. 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. In addition, the Human Resources Investigative Unit reported an additional 26 Anti-Discrimination, Harassment & Retaliation ("ADH&R") complaints.¹ The ADH&R complaints received solely by Human Resources are not included in the Ethics Officer's complaint numbers; only the ADH&R complaints filed directly with the Ethics Officer or filed via the Employee Report Line are included in the number in this report.

¹ The Human Resources Investigative unit reported 36 complaints in 2021, including 10 of the discrimination/harassment complaints received by the Employee Report Line for Anti-Discrimination, Harassment & Retaliation ("ADH&R"). Of the 36 complaints, investigations were conducted for 10 complaints, 14 of the complaints were returned to the applicable departments for investigation as non-ADH&R complaints, and 12 complaints were, for various reasons, closed with no further action. Only the Human Resources Investigative unit's discrimination/harassment complaints received via the Employee Report Line reported are included on the chart on page 11.

Complaints were reported using the following methods:²

Reporting Method	2018	2019	2020	2021
Ethics Officer	10	9	16	24
Ethics Report Line – Internet	27	27	24	24
Ethics Report Line – Telephone	5	4	8	23
Required Reporting by Department	20	5	17	19
311 Reporting	1	0	0	2
Self Reporting	1	0	0	0
Totals	64	45	70	92

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

Year	Ethics Report Line as a Percent of Total Reports
2018	48%
2019	69%
2020	48%
2021	54%

The use of the Employee Report Line, as a reporting mechanism, has remained fairly constant as a percentage of reports in recent years, though employee use of the web-based filing tool has steadily increased. The increased 2019 Employee Report Line usage percentage is attributable to the decreased departmental reporting of ethics violations that year.

Original Incident Reports	2018		2019		2020		2021	
	% City	% All Reports	% City	% All Reports	% City	% All Reports	% City	% All Reports
Anonymous Reports ³	78%	57%	65%	59%	77%	58%	52%	50%
Non-Anonymous Reports	22%	43%	35%	41%	23%	42%	48%	50%

Historically, the City’s anonymous reporting has been significantly higher than that of the vendor’s benchmarks, but City employees are slowly becoming more comfortable with disclosing their names when filing a complaint. A lower rate of anonymous reporting is indicative 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

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, some of this year’s complaints were reported by multiple complainants using the Ethics Report Line, the Ethics Officer, and Human Resources as the reporting mechanism. Another example is the one complaint filed by 19 different complainants via two reporting methods.

³ The statistics provided by the prior vendor, Navex, are used for this table.

back is essential for the City to properly investigate anonymous complaints. When the City’s anonymous callers do not re-contact the report line, some complaints are closed due to an inability to further investigate.

The subject matter of the 114 complaint allegations covered the entire Ethics Code as well as other management concerns.⁴

Subject Matter, Ethics Code Section	2018	2019	2020	2021
Fiduciary Duty, 15.30	0	1	2	7
Conflict of Interest, 15.40	1	3	3	2
Gifts, 15.50, & Related Policies	3	1	0	2
Outside Employment, 15.60	2	0	2	4
Use of Official Position, 15.70	1	0	9	4
Statements of Economic Interest, 15.80	0	0	0	0
Post-employment, 15.90	0	0	0	0
Use of City Resources, incl. Time, 15.100	19	16	17	14
Political Activity, 15.110	2	2	2	12
Loans	0	0	0	0
Required Reporting of Fraud, 15.140	1	0	0	0
Discrimination/Harassment, 15.150	10	21	23	18
Nepotism, 15.160	1	2	1	2
Use/Disclosure of Information, 15.170	4	7	10	7
Bias or Favoritism, 15.190	11	5	10	6
Inappropriate Influence, 15.200	0	1	2	10
Contract Compliance, 15.250	0	0	0	0
Management Issues/Employee Relations	3	1	1	14
Other Policy Violations	9	6	2	0
Compliance with Other Laws	1	1	1	1
Ethical Aspirations, 15.10, 15.20, 15.130, & 15.180	1	2	3	9
Other	3	0	0	2

The top three categories of complaints were discrimination/harassment, use of City resources, and management issues/employee relations. In past years, complaints related to the use of city property and resources and discrimination/harassment have historically been a substantial portion of total complaints. In 2021, we saw a significant increase in both political activity complaints and complaints regarding City management and employee relations.

In 2021, bias or favoritism allegations and discrimination or harassment allegations constituted 21% of the total allegations received. If the complaints received directly by Human Resource’s ADHR Policy investigators are considered, discrimination and harassment allegations constituted over a third 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

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

the appropriate department for investigation.⁵ 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” “are examples of misconduct, which may be cause for disciplinary action.”⁶ 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 ADH&R and non-ADH&R, as well as bias and favoritism allegations, can be complicated subjects and difficult to prove. Of the 18 ADHR discrimination and harassment complaints and the 6 bias or favoritism allegations received in 2021, over 87% were closed as unsubstantiated, no action taken. Nevertheless, it is important to be aware of this continuing 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 routinely reviewed to ensure they are effective as well as neutral and objective as possible.

Political activity, and related allegations significantly increased previous calendar years. The number political activity of complaints filed in 2021 equaled the total number of political activity complaints filed in the last fifteen years combined. The increased filing coincides with the 2021 election in which all City elected officials and changes to the City Charter were on the ballot. Upon review, the vast majority of complaints contained allegations not covered by the Ethics Code, with some appearing to use the ethics complaint process as a political weapon. The Board is concerned about the public’s understanding of both the complaint process and the scope of the Board’s authority as to a filed complaint. Staff is working on adding educational information to the Board’s website to address these concerns. The new website information will include information regarding the necessary and what must be proven to support a finding of a violation of the Ethics Code. It will also include additional details about the complaint process and how the process differs for general employees versus department heads, appointed board and commission members and elected officials.

The end-of-the-year status of the 18 carryover complaints and the 87 new 2021 complaints are as follows:⁷

Pending – 27	Discipline imposed –5
Unsubstantiated, no action taken – 31	Coaching –13
Department action taken –8	No jurisdiction – 2
No probable Cause – 3	Closed (Rule 7.6) – 10
Complainant failed to cooperate – 3	Administrative Closure – 5

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.

⁵ See footnote 2, *supra*.

⁶ Civil Service Rules, Rule 11.03(B)(11).

⁷ Some complaints contained more than one outcome so these numbers will not equal the number of complaints received.

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 believes a comprehensive review of the Ethics Code and a comparative analysis of other Ethics Codes is needed. The review and analysis are included on the 2022 Workplan and are dependent upon the availability of staff. The Board anticipates staff will bring forward proposed ordinance changes in 2023 when the review and analysis is completed.

2021 Volunteer Hours

The three members of the Board collectively spent approximately 65 hours on work related to the Board during the 2021 calendar year. On average, each member spent approximately 3.75 hours per meeting on Board related activities.

2022 Work Plan

The 2022 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.