



ETHICAL PRACTICES BOARD

2022

Annual Report



Jacob Frey, Mayor ~ Andrea Jenkins, City Council President
Walter G. Bauch, Chair ~ Susan L. Trammell, Ethics Officer

TABLE OF CONTENTS

Introduction	2
Appointment and Membership	2
Mission	3
2021 Accomplishments	3
I. Ethics Education	3
II. Ethics Inquiries	6
III. Ethics Report Line and Ethics Complaints	8
IV. Proposed Ordinance Changes	11
2021 Volunteer Hours	11
2022 Ethical Practices Board Work Plan	12

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 2022 members of the EPB were Walter Bauch, Kyle Kroll, Robert Dube and Michael Friedman. Walter Bauch was the EPB’s 2022 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, 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.

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. Mr. Kroll resigned from the EPB at the end of January 2022 due to relocating outside of the City. Robert Dube, was appointed to the EPB in March 2022 to serve the remainder of the term vacated by Mr. Kroll. Mr. Dube is an associate attorney with the law firm of Eckland & Blando, LLP. He practices in the area of commercial litigation labor and employment law and international trade and customs.

Michael Friedman was appointed to the EPB in March of 2022 to serve a term expiring January 2, 2024. Mr. Friedman is the former Executive Director of the Legal Rights Center (LRC). His work with LRC has spanned the adversarial, restorative, and collaborative processes of the legal system. He also serves as a public member of the Lawyers Professional Responsibility Board and previously served as a member of the Fourth Judicial District Ethics Committee and the Minneapolis Civilian Police Review Authority.

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 newly elected officials, appointed board and commission members, and employees to attend an ethics education seminar within six months of beginning their term or employment. 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 464 of the 606 appointments were filled. Of the filled memberships, ethics education compliance is at 71% which is down from 79% in 2021. The compliance rate in both 2021 and 2022 was significantly higher than prior years. The gains made in board member ethics education compliance is entirely due to the City Clerk's continuous compliance requirement communications with board members and board liaisons. Additional efforts will need to be taken to improve the rate of board member 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, 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 the date of this report, this training is not yet ready for implementation. It is expected that this training will be completed in quarter two of 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 85 times in 2022.

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 2022, the Ethics Officer, or a designee, conducted 7 in-person trainings for new employees in the Minneapolis Police Department, 2 trainings for new employees in the Minneapolis Fire Department and 3 ethics trainings 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 disagreed with discontinuation of in-person ethics education. The Ethics Officer is continuing discussions with the Human Resources Department to reverse the department’s decision and to ensure in-person education remains a City priority.

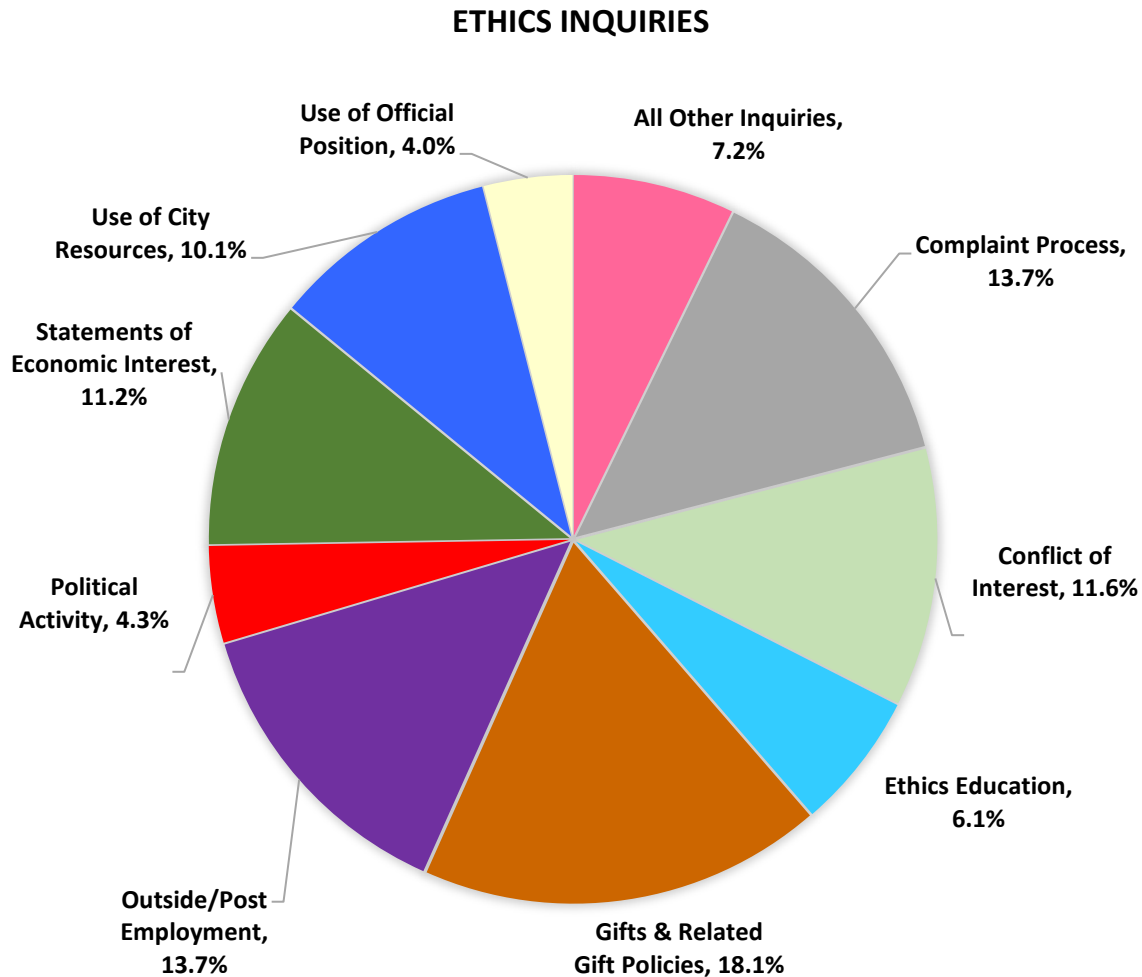
As of December 31, 2022, COMET records show 81.7% of employees, regular and seasonal, are compliant with the required Ethics Code education. The percent compliant slightly improved over the 77.0% and the 81.2% compliant for the previous two calendar years. In 2022, the Ethics Officer worked with the IT Department and Human Resources, Training and Development Division to automate reminders to employees when they need to take refresher education. This automatic notification system will begin April 1, 2023 and should assist in improving the compliance percentages. 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 30, 2022**

Department	COMET Reported Number of Employees	Up-to-date Ethics Education	Employees out of Compliance	Refresher Training Due in 2023
311	41	41	0	1
911	61	54	7	5
ASSESSOR	37	35	2	8
ATTORNEY	107	92	2	33
CITY CLERK	90	89	1	9
CITY COORDINATOR	31	24	7	3
CIVIL RIGHTS	31	29	2	2
COMMUNICATIONS	15	12	3	10
COMMUNITY PLANNING & ECONOMIC DEVELOPMENT	227	223	4	54
CONVENTION CENTER	144	135	9	62
EMERGENCY MANAGEMENT	9	9	0	1
FINANCE AND PROPERTY SERVICES	267	262	5	61
FIRE DEPARTMENT	465	207	258	32
HUMAN RESOURCES	56	48	8	3
INFORMATION TECHNOLOGY	91	68	23	7
INTERGOVERNMENTAL RELATIONS	5	3	2	0
INTERNAL AUDIT	5	5	0	0
MAYOR	14	12	2	2
MINNEAPOLIS HEALTH DEPARTMENT	154	134	20	18
NEIGHBORHOOD COMMUNITY RELATIONS	26	25	1	1
POLICE DEPARTMENT	745	523	222	317
PUBLIC WORKS	1093	962	131	350
REGULATORY SERVICES	176	175	1	15
Totals	3890	3180	710	994

II. Ethics Inquiries

From January 1, 2022, through December 31, 2022, the Ethics Officer answered 277 telephone and email inquiries regarding ethics. The number of inquiries was down slightly from the 307 inquiries in 2020 and the 310 inquiries in 2021. The Board finds it encouraging that so many employees are mindful of adhering to the ethical requirements and seek guidance when these issues arise in the workplace. The substantive topics of 2022 inquiries were as follows:



Gifts was the leading inquiry category of the year, followed by complaint process and outside/post employment in a tie for second. Prior to 2021, gift inquiries ranked in the top three most asked categories for over a decade. In 2021, it dropped to fourth.

This is the third year that complaint process inquiries have been in the top three most asked category. These 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. While complaint process inquiries are occasionally presented by employees, more often they come from non-employees. Historically, conflict of interest and outside employment inquiries have consistently comprised a substantial volume of the inquiries and usually ranked in the top three inquiry categories. conflict of interest inquiries dropped to fourth this year.

In the above Ethics Inquiries Chart, the inquiry category “All Other Inquiries” contains all categories of inquiries constituting less than 1.0% 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 inquiries:

ETHICS INQUIRIES – HISTORICAL

Category, Ethics Code Section	Percentage Inquiries 2019	Percentage Inquiries 2020	Percentage Inquiries 2021	Percentage Inquiries 2022
Aspirations, 15.10,15.20,15.130 & 15.180	0.6%	0.3%	0.6%	0.0%
Fiduciary Duty, 15.30	0.3%	1.0%	0.3%	1.1%
Conflict of Interest, 15.40	10.7%	8.1%	12.0%	11.6%
Lobbyists, 15.40(b)(4)	0.3%	1.6%	0.3%	0.0%
Gifts, 15.50	22.7%	9.8%	10.2%	13.7%
Outside Employment, 15.60	8.4%	9.1%	10.8%	11.2%
Post-employment, 15.90	1.6%	9.1%	2.7%	2.5%
Use of Official Position, 15.70	2.3%	3.9%	1.5%	4.0%
Statements of Economic Interest, 15.80	17.8%	4.6%	5.7%	11.2%
Use of City Resources, 15.100	7.1%	5.2%	3.9%	10.1%
Political Activity, 15.110	2.3%	7.5%	8.1%	4.3%
Loans, 15.120	0.6%	0.0%	0.0%	0.0%
Required Reporting, 15.140	0.6%	0.0%	0.0%	0.4%
Discrimination / Harassment, 15.150	0.0%	0.0%	0.0%	0.0%
Nepotism, 15.160	0.0%	1.3%	0.9%	0.7%
Use/disclosure of Information, 15.170	0.3%	0.3%	0.6%	0.7%
Bias/Favoritism, 15.190	0.3%	1.3%	0.9%	0.4%
Inappropriate Influence, 15.200	0.0%	0.0%	0.3%	0.0%
Ethical Practices Board, 15.210	1.3%	2.9%	1.2%	1.1%
Complaint Process, 15.230	6.5%	15.0%	23.1%	13.7%
Contracts, 15.250	0.0%	1.0%	0.3%	0.4%
Ethics Education, 15.260	8.7%	4.2%	5.7%	6.1%
Related Policies - Solicitation of Gifts to the City, Gifts between Employees & Charitable Organizations	4.9%	12.1%	6.0%	4.3%
Miscellaneous	2.6%	1.6%	5.1%	2.5%

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 accommodate 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 Business Partner for the applicable department. The Ethics Officer contacts the department and/or the HRBP periodically to check on the status of the investigation until the complaint is closed.

Ethics Complaints

In 2022, a total of 88 new complaints containing 107 allegations were received and 27 complaints were carried over from prior years.¹ The 88 total complaints received include 33 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 39 Anti-Discrimination, Harassment & Retaliation Policy ("ADH&R") complaints.² The ADH&R complaints received solely by Human Resources

¹ Some complaints have been filed in duplicate by several complainants. Only one of the duplicate complaints is counted for record keeping purposes. In 2022, there were two complaints filed in duplicate: One complaint had 1,325 complainants and the second was filed by 3 complainants.

² The Human Resources Investigative unit reported 50 complaints in 2022, including 4 of the discrimination/harassment complaints received by the Employee Report Line for Anti-Discrimination, Harassment & Retaliation ("ADH&R"). Of the 50 complaints, investigations were conducted for 18 complaints, 17 of the complaints were returned to the applicable departments for investigation as non-ADH&R complaints, and 15 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.

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.

Complaints were reported using the following methods:³

Reporting Method	2019	2020	2021	2022
Ethics Officer	9	16	24	31
Ethics Report Line – Internet	27	24	24	19
Ethics Report Line – Telephone	4	8	23	7
Required Reporting by Department	5	17	19	33
311 Reporting	0	0	2	0
Self Reporting	0	0	0	0
Totals	45	70	92	90

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

Year	Ethics Report Line as a Percent of Total Reports
2019	69%
2020	48%
2021	54%
2022	33%

Employee use of the web-based filing option has steadily increased over the use of the telephone option. In 2022, 75% of the Employee Report Line reporters used the web-based tool instead of the telephone option.

Original Incident Reports	2019		2020		2021		2022	
	% City	% All Vendor Clients	% City	% All Vendor Clients	% City	% All Vendor Clients	% City	% All Vendor Clients
Anonymous Reports ⁴	65%	59%	77%	58%	52%	50%	52%	27%
Non-Anonymous Reports	35%	41%	23%	42%	48%	50%	48%	73%

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-

³ Occasionally a complainant utilizes multiple reporting mechanisms to report their concerns. For those years in which complainants utilized multiple reporting methods, the reporting method numbers will not equal the number of complaints received. In 2022, there were two complainants who utilized more than one reporting mechanism.

⁴ The statistics provided by the city’s prior employee report line vendor, Navex, are used for years 2019-2021. The City’s current employee report line vendor, Ethico, reported the following percentages of anonymous calls from 2019 – 35%, 2020 – 32%, 2021 – 28% for those same years.

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. 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 107 complaint allegations covered the entire Ethics Code as well as other management concerns.⁵

Subject Matter, Ethics Code Section	2019	2020	2021	2022
Fiduciary Duty, 15.30	1	2	7	1
Conflict of Interest, 15.40	3	3	2	3
Gifts, 15.50, & Related Policies	1	0	2	4
Outside Employment, 15.60	0	2	4	1
Use of Official Position, 15.70	0	9	4	3
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	16	17	14	7
Political Activity, 15.110	2	2	12	2
Loans	0	0	0	0
Required Reporting of Fraud, 15.140	0	0	0	2
Discrimination/Harassment, 15.150	21	23	18	28
Nepotism, 15.160	2	1	2	1
Use/Disclosure of Information, 15.170	7	10	7	15
Bias/Favoritism, 15.190	5	10	6	11
Inappropriate Influence, 15.200	1	2	10	4
Contract Compliance, 15.250	0	0	0	0
Management Issues/Employee Relations	1	1	14	3
Other Policy Violations	6	2	0	13
Compliance with Other Laws	1	1	1	6
Ethical Aspirations, 15.10, 15.20, 15.130, & 15.180	2	3	9	1
Other	0	0	2	2

The top three categories of complaints were discrimination/harassment, use of information, and other policy violations. 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. 2021 was unusual year with a significant increase in both political activity complaints and complaints regarding City management and employee relations. In 2022, these political activity complaints returned to a more typical level. Other policy violations, however, rose dramatically this year. This complaint category covers allegations related to all the other policies governing the City’s workplace and does not implicate any actual provisions of the Ethics Code.

In 2022, bias or favoritism allegations and discrimination or harassment allegations constituted 36% of the total allegations received. If the complaints received directly by Human Resource’s ADHR Policy

⁵ Some complaints contained more than one allegation so these numbers will not equal the number of complaints received.

investigators are added, discrimination/harassment and bias/favoritism allegations constituted over half of the total allegations received. Discrimination/harassment allegations involving protected classes are investigated by the Human Resources Investigation Unit for violations of the ADH&R Policy, whereas discrimination/harassment complaints containing non-protected class allegations are forwarded to the appropriate department for investigation.⁶ Complaints alleging non-protected class discrimination/harassment may warrant investigation pursuant to the City’s Civil Service Rules or Ethics Code. 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.”⁷ Such 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/favoritism allegations, can be complicated subjects and difficult to prove. 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.

The end-of-the-year status of the 27 carryover complaints and the 88 new 2022 complaints are as follows:⁸

Pending – 42	Discipline imposed –0
Unsubstantiated, no action taken – 24	Coaching –11
Department action taken –7	No jurisdiction – 9
Closed (No probable Cause) – 1	Closed (Rule 7.6) – 10
Complainant failed to cooperate – 9	Administrative Closure – 4

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.

IV. Proposed Ordinance Amendments

The Board is not proposing any amendments to the Ethics Code at the time of this report. The Ethics Code has been in effect for nearly 20 years. During 2021 and 2022 the Ethics Officer reviewed the ethics codes of other jurisdictions and is recommending changes to both the Ethics Code and the Board structure. The Board has directed staff to pursue the necessary amendments. The Board anticipates staff will bring forward proposed ordinance changes in 2023 when the review, analysis and drafting is completed.

2022 Volunteer Hours

The three members of the Board collectively spent approximately 83 hours on work related to the Board during the 2022 calendar year. On average, each member spent approximately 5 hours per meeting on Board related activities.

⁶ See footnote 2, *supra*.

⁷ Civil Service Rules, Rule 11.03(B)(11).

⁸ Some complaints contained more than one outcome so these numbers will not equal the number of complaints received.

2023 Work Plan

The 2023 work plan is predicated on the availability of City staff to complete the tasks requiring staff involvement.

Ethics Education

- Consult with departments to determine the ethics education needs of employees and contractors, conducting ethics education seminars for departments as requested.
- Create and implement a communication strategy to promote awareness of both ethics and the Ethics Report Line.
- Review all content for electronic ethics education course.
- Seek reinstatement of in person ethics education for new employees.

Ethics Code Review & Revision

- Conduct 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 and the Ethical Practices Board.

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 Employee Report Line

- Participate in the Human Resources triage team to review and assign complaints received alleging employee misconduct.
- Collaborate with the Human Resources to address the issues found in the Internal Investigation Process Audit.
- Appropriately address complaints regarding elected officials and department heads:
 - Present case analysis and recommendations to the Board.
 - Arrange for and manage investigations when necessary.
 - Prosecute contested cases before the Board.

Promote an Ethical Culture in the City of Minneapolis

- Reach out to elected officials and department management to engage them in discussions about ethical cultures and ways to improve the City's culture.