
FY 2019 Recommendations

1. AGENCY: FIRE/ EMS

ALLEGATION: 18-0226e - Employee's misuse of prestige of office in directing business to County vendor and engagement in secondary employment without agency approval.

DISPOSITION: Partially Substantiated

RECOMMENDATIONS:

1. Fire Chief enforce uniform compliance with the secondary employment provision of the Ethics Code as outlined by Administrative Procedure 152. Further, Fire Chief advise the employee to obtain ethics advice from OEA with regards to employee's company.
2. Fire/EMS ensure that the manager recuse self from any contract negotiations, selection, extensions or related matters with regards to the contractor and the County to avoid an actual or appearance of a conflict of interest.
3. Fire/EMS Apparatus Division develop a written procedure for staff to request parts, equipment or services from vendors. The procedure should include, but not limited to, staff name, date of request, and part, equipment or service requested.
4. The Fire Chief establish a secondary employment policy that meets the needs of the Department, for review and approval by the Board of Ethics.

ACTION(S) TAKEN/RESPONSE(S):

1. An agency memorandum was sent to all Fire/EMS personnel reminding them of the County's secondary employment and County's Administrative Procedure 152 requirements.
2. The employee, as part of employee's company, was instructed to not engage with any business that is providing services for the County.
3. The purchasing of parts, services and equipment by Apparatus Maintenance will be tracked and documented using Shop Tickets. These tickets will be tracked by fiscal year in an Access database that is accessible to personnel who are authorized to make purchases for the County. County credit card purchases will be entered into the Shop Ticket System.
4. The department will continue to follow the County's Administrative Procedure 152 for approval of secondary employment requests.

2. AGENCY: Office of Central Services (OCS)

ALLEGATION: 18-0332e - Employee falsification of timecards.

DISPOSITION: Unsubstantiated

RECOMMENDATIONS:

1. The Director of OCS ensure that all staff are using the correct Electronic Time System (ETS) codes when entering their work time using the offsite code to document start and/or finish times.
-

2. Although the respondent's supervisor was in agreement with time reporting and work locations, they have not followed the County's Telework policy to document the work arrangement and create risks associated with disability leave under Personnel Law Section 16-224 and Administrative Procedure 284. The Director should ensure that, pursuant to County Personnel Procedure 226, a formalized agreement is in place to document employee's work schedule.

ACTION(S) TAKEN/RESPONSE(S):

1. Current OCS Director conducted a follow-up meeting with staff to determine whether recommendations were implemented. Findings revealed that staff are currently using correct ETS codes. In addition, there is no evidence that the employee is currently engaged in telework. Therefore, no agreement is necessary at this time.

3. AGENCY: OCS

ALLEGATION: 18-0354 – Falsification of employee timecard and engagement in secondary employment without agency approval.

DISPOSITION: Partially Substantiated

RECOMMENDATIONS:

1. Although the respondent completed the mandatory 80 hours per pay period, and the supervisor was aware of the employee's documented attendance, the County's Telework and agency policies on time reporting were not followed. Pursuant to County Personnel Procedure 226 on Telework, a formalized agreement is required to document the employee's work schedule. It is also recommended that the agency consult with the Office of Human Resources Management (OHRM) on the appropriate application of the OHRM Procedure for the Alternative Work Schedule Program, which currently does not provide for an employee to report to work after 12:00 pm as part of its compressed or flex schedule.

2. It is further recommended that the Director of OCS enforce compliance with Administrative Procedure 152 Secondary Employment by instructing the employee to complete a secondary employment request within ten (10) business days of the Director's directive.

ACTION(S) TAKEN RESPONSE(S):

1. Contents of the report were reviewed, and measures were taken to address the substantiated allegations. The employee no longer participates in an alternate work schedule (AWS) or teleworking and works a regular work schedule.

2. An executed agreement authorizing secondary employment is on file now.

4. AGENCY: Office of Human Resources Management (OHRM)

ALLEGATION: 18-0360e – Receipt of prohibited gifts from County vendor who paid for employees' travel expenses to attend a meeting, mismanagement of temporary employees, and mismanagement of County resources through erroneous payment of death benefit.

DISPOSITION: Unsubstantiated

RECOMMENDATIONS:

1. The Benefits Administration adhere to Section 2-293(d) of the Code of Ethics, Solicitation and

Acceptance of Gifts. Prior to attending events sponsored by County vendors or potential County vendors, OHRM Director direct employees to receive ethics advice from OEA.

2. The Director of OHRM review the practice of sending County employees who participate in the selection process of County vendors to events sponsored by those vendors. Consideration should be given by OHRM to sending County employees who do not have direct or indirect authority in negotiations with vendors.

3. Employee be instructed to report on the employee's 2018 Financial Disclosure Statement the expenses related to the symposium and meeting attended in 2018 where the County vendor paid for the employee's expenses.

4. The former official be instructed to report on 2018 Financial Disclosure Statement, expenses related to the symposium that official attended in 2018.

5. The Director of OHRM conduct an internal review to determine how the incorrect individuals were paid a death benefits claim.

6. The Benefits Administration develop a standard operating procedure for the collection and processing of revenue that complies with the directives detailed in Administrative Procedure 346.

7. The Chief Administrative Officer direct the County to develop a policy to ensure that adequate controls and monitoring safeguards are put into place regarding the use of temporary staffing services by County agencies. The policy should be inclusive of circumstances, duration and supervision of temporary services. Administrative Procedure 204 - *Temporary Positions*, as revised in September 2018, is only applicable to temporary employees hired in a seasonal (1000-hour), provisional or emergency capacity. The policy does not address the use of temporary employees who are hired outside of those specific categories. This policy in its current form, does not fully address the allegations made in the instant matter.

ACTION(S) TAKEN RESPONSE(S):

1. OHRM sent email advising staff to consult with OEA regarding questions concerning ethics issues.

2. OHRM has reviewed the practice and will seek a formal opinion from the Board of Ethics when unclear if participation or payment violates the County's Code of Ethics.

3. Employee has amended the FDS.

4. Former Official has amended the FDS.

5/6. Due to the turnover in the Benefits Division and the time that has passed since the incident in question, the agency's leadership believes an internal review would not uncover the underlying issues. To conduct a transparent review of our processes, OHRM will look to engage a free Benefit Consultant resource offered through the Maryland Association of Counties (MACo) to perform a material audit. The agency hopes to secure services within the next six (6) months.

7. Chief Administrative Officer directed OCS, OMB and OHRM to create a work group to review policies and budget regarding the use of temporary staffing services.

5. AGENCY: Depart of Public Works and Transportation (DPW&T)

ALLEGATION: 18-0374e – Violation of County’s fraternization policy by supervisors within Highway Maintenance’s hiring and supervising family members.

DISPOSITION: Partially Substantiated

RECOMMENDATIONS:

1. DPWT conduct training for managers and employees regarding Administrative Procedure 228 - *Fraternization*. The training should include a review of Section 2-293(c), Use of Prestige of Office, of the Ethics Code.

ACTION(S) TAKEN/RESPONSE(S):

1. DPWT has reassigned those employees flagged as being in a chain of conflict. DPW&T will conduct agency training regarding fraternization, created new agency forms to identify incidents of fraternization and created a new agency directive that reiterates the County’s fraternization policy.

6. AGENCY: Office of Central Services (OCS)

ALLEGATION: 18-0383e - Employees receiving prohibited gifts of money to expedite the repair of County vehicles.

DISPOSITION: Unsubstantiated

RECOMMENDATIONS:

1. During the interviews it was noted that the managers had different understandings as to what the division’s policy was regarding gift-taking. For that reason, it is recommended that the Fleet Management Division develop a divisional policy that details the prohibition on gift-taking. The policy should reference the County’s Ethics Code and require that literature be posted throughout the facilities explaining that gifts and gratuities are not accepted. Staff members should receive regular training on the policy and sign a document indicating that they have received training and understand the information.

ACTION(S) TAKEN/RESPONSE(S):

1. To ensure all Fleet Division staff complete the annual mandatory ethics training (regarding gifts and gratuities) offered online by Office of Ethic and Accountability, the Fleet Division of OCS will adopt the following additional measures:
 - a) Update and reissue Division-wide email instructing staff to refrain from gift taking of any sort.
 - b) Continue to post signage throughout the work place prohibiting the acceptance of any gifts or gratuities from either vendors or customers.
 - c) Establish and issue a Divisional policy prohibiting acceptance of tips since employees are not required to submit financial disclosure.

7. AGENCY: Department of Permitting, Inspections and Enforcement (DPIE)

ALLEGATION: 18-0389e - Inspector misuse of prestige of office during a verbal dispute with a

restaurant owner.

DISPOSITION: Unsubstantiated

RECOMMENDATIONS:

1. In light of the respondent's position with the County as an inspector, the actions of identifying oneself as a County employee can reasonably be misconstrued. As such, OEA recommends the Director instruct the respondent to refrain from using their County title in a way other than its intended purpose to avoid any appearance of misuse of prestige of office.

ACTION(S) TAKEN RESPONSE(S):

1. Agency met with and instructed employee in accordance with recommendation.

8. AGENCY: Office of Information Technology (OIT) AND Office of Central Services (OCS)

ALLEGATION: 18-0400e – Human Resources Managers' misuse of their positions in the hiring of relatives.

DISPOSITION: Unsubstantiated

RECOMMENDATIONS:

1. OHRM institute a policy or guidance instructing Human Resources (HR) Liaisons and HR Managers/Officers to notify OHRM and agency Directors when their family members are part of a hiring certificate sent to their agency. Upon notification of the aforementioned conflict of interest, OHRM must provide HR Liaisons and Managers with options to proceed with the hiring process absent that HR representative's involvement.

ACTION(S) TAKEN RESPONSE(S):

1. Director will ensure the proper guidance and communication is directed to the Appointing Authorities and their respective HR Liaisons. Additionally, OHRM will be rolling out mandatory training for the HR community and managers in the upcoming months. The mandatory training will address these matters along with a full range of topics connected to HR activity for the full cycle of County employees.

9. AGENCY: Department of the Environment (DOE)

ALLEGATION: 18-0415e – Prohibited conflict of interest by manager in oversight of a contract of a vendor that employs manager's relative.

DISPOSITION: Substantiated

RECOMMENDATIONS:

1. The Board of Ethics is the advisory body responsible for interpreting the County's Code of Ethics and advising persons subject to its jurisdiction. OEA recommends that Executive Leadership seek a formal advisory opinion from the Board of Ethics regarding the conflicts of interests as discussed in the report regarding the manager. The Board of Ethics may conduct hearings and take appropriate enforcement actions in matters in which it has a reasonable basis to believe a violation has occurred.

ACTION(S) TAKEN RESPONSE(S):

1. DOE implemented the following safeguards: The manager is prohibited from discussing any matter relating to the County contract with relatives, knowingly attending any meeting in which the relative is a participant; participating in any discussion or decision regarding MES contract performance if the performance in any way involves a relative, approving MES invoices; and resolving any issue involving MES contract performance.

10. AGENCY: Office of Central Services (OCS)

ALLEGATION: 18-0429e – Falsification of County Official timecard.

DISPOSITION: Unsubstantiated

RECOMMENDATIONS:

1. In light of the allegations, the process currently in place has the Special Assistant to the Chief Administrative Officer (CAO) approving time without verifying with the Deputy Chief Administrative Officers (DCAO) or their special assistants, who maintain regular communication with Directors (within their cluster of agencies) and are aware of their time off/use of paid time off. OEA recommends the approval of Directors' time cards be completed by the Special Assistants to each DCAO, given the DCAO's are aware of paid time off for their Directors who report to them.

ACTION(S) TAKEN RESPONSE(S):

1. CAO directed OHRM to include timecard management in Executive Training Institute session. CAO directed DCAOs to ensure that their respective agencies are conveying and scheduling leave prior to use.

11. AGENCY: Office of Community Relations (OCR)

ALLEGATION: 19-0032e- Employee falsification of timecard and engagement in secondary employment without agency approval.

DISPOSITION: Partially Substantiated

RECOMMENDATIONS:

1. OCR Director instruct employee submit a secondary employment request within ten (10) business days.

ACTION(S) TAKEN/RESPONSE(S):

1. The employee has submitted a secondary employment request in compliance with County regulations.

12. AGENCY: Office of Central Services (OCS)

ALLEGATION: 19-0033e – Misuse of prestige of office by County Official by referring a family member to a temporary staffing agency to obtain employment with Office of Information Technology.

DISPOSITION: Unsubstantiated

RECOMMENDATIONS:

1. The Chief Administrative Officer review the County's use of temporary staff using temporary staffing agencies and utilization of agency General & Administrative (G&A) budgets to fund temporary staff, particularly when a project extends or is expected to extend beyond a year. This review should include any practices of referring individuals to temporary staffing agencies in order to effectuate a direct hire.
2. Office of Management and Budget (OMB) conduct an internal review of Office of Technology's use of temporary staffing services utilizing contracting services account funds, which exceed 100% of the approved budgeted amount.

ACTION(S) TAKEN/RESPONSE(S):

1. Chief Administrative Officer directed OCS, OMB and Office of Human Resources Management to create a workgroup to review policies and budget for temporary staffing services.
2. The Office of Management and Budget has reviewed the information provided on the case and the recommendation that OMB review OIT's use of temporary staffing where it exceeds 100% of the approved amount. This has been noted and OMB will look into the use of Temporary staffing by OIT and consider whether any adjustments to procedures are warranted. Extensive use of temporary staff was already a concern of OMB.

13. AGENCY: Office of Central Services (OCS)

ALLEGATION: 19-0037/38e – Misuse of prestige of office by County employees assisting friends and family members obtain both temporary and permanent employment positions in County government.

DISPOSITION: Unsubstantiated

RECOMMENDATIONS:

1. Implement the previous OEA recommendations detailed in case #18-0030e:
 - a) OEA recommends a written County policy be implemented to ensure that adequate controls and monitoring safeguards are put into place regarding the use of temporary staffing services by all County agencies (including OCS). The policy should include when temporary services may be used; under what circumstances; how rates of pay will be determined in relation to the class of work; and the duration of the use of temporary services.
 - b) Administrative Procedure 204 (Temporary Positions), is only applicable to temporary employees hired in a seasonal employee (1000-hour), Provisional or Emergency Capacity. The policy does not address the use of temporary employees who are hired outside of those specific categories. Even with the revisions, the policy still allows agencies to directly select and hire an applicant. Agencies are required to first submit the applications to OHRM to verify that the applicants meet the minimum qualifications. This policy in its current form, does not fully address the allegations made in the instant matter or those alleged in case #18-003e.
 - c) Conduct an external audit of OCS' use of temporary staffing services and to determine if OCS is circumventing the competitive hiring process for filling permanent positions.
 - d) As part of the approval process for temporary/provisional appointments, including Limited Term Granted Funded positions, instruct OHRM to inquire from the applicants and

requesting Department Heads, if applicant has previously worked for the County.

- e) Request the Office of Finance to audit OCS' expenditures on use of temporary staffing services.
 - f) Instruct OCS to consult with OHRM to ensure that the classifications of work used when requesting temporary staff to fill a position is done in alignment with OHRM classifications and corresponding rates of pay for those positions.
2. Instruct OCS Human Resources Department to consult with OHRM for assistance in developing a written policy regarding personnel record retention of all OCS employees including temporary staff.

ACTION(S) TAKEN/RESPONSE(S):

- 1. Chief Administrative Officer directed OCS, OMB and OHRM to create a work group to review policies and budget regarding the use of temporary staffing services.

14. AGENCY: COUNTY COUNCIL

ALLEGATION: 19-0063e – Employees' use of County resources to send email promoting a political event.

DISPOSITION: Substantiated

RECOMMENDATIONS:

- 1. Notification be sent to Council Administrator regarding employees' actions with a recommendation of appropriate discipline.

ACTION(S) TAKEN RESPONSE(S):

- 1. Council Administrator advised employees were disciplined and the Board of Ethics sent a letter to the Council Member.

15. AGENCY: Department of Permitting, Inspections and Enforcement (DPIE) and Department of Public Works and Transportations (DPW&T)

ALLEGATION: 19-0072 – Waste of County resources when employee approved task orders for staff augmentation services that compensated vendor at a 100% markup instead of 75%.

DISPOSITION: Substantiated

RECOMMENDATIONS:

- 1. The Director of DPW&T review and evaluate the management of RFP S10-029 and take measures to ensure adequate checks and balances are in place to verify compliance with the requirements of the contract by the administrator.
- 2. The Director of DPW&T direct an audit of the task orders that were completed by vendor under S10-029, related to staff augmentation, to ensure that the firm was compensated at the appropriate administrative and overhead rate.
- 3. The Director of DPW&T consult with the Office of Law to ensure the appropriate method of

reconciling the misinformation concerning the markup rate associated with the task order and any other task orders that may be discovered as a result of DPW&T's audit.

4. The Director of OCS and OOL review the language in contracts regarding audit letters to determine whether periodic updated audit letters should be required, especially with contracts that have the capacity for multiple extensions.

5. OCS develop and provide training and policy guidance for proper contract administration (as previously recommended in case #15-0131) for contract administrators in agencies with delegated authority.

ACTION(S) TAKEN/RESPONSE(S):

1. After a review of the management of RFP S10-029, DPW&T now has tasks orders reviewed by the Office of Administrative Services, Financial Management Division to ensure contract rates are accurate and requires final approval of the Director or Deputy Director prior to any issuance of notice to proceed for any task orders.

2. An agency audit confirmed that the vendor was being paid at the incorrect markup rate of 100% which resulted in the vendor being overpaid by the County a total of \$41,615.58

3. The DPW&T, OMB consulted with OOL to ensure appropriate measure of reconciling the overpayment.

4. OCS and OOL will review the language in contracts regarding audit letters to determine if periodic updated audit letters should be required.

5. OCS will provide training and policy guidance for proper contract administration and review future language for services.

16. AGENCY: Office of Central Services (OCS)

ALLEGATION: 19-0084e – Employee's engagement in secondary employment without agency approval and prohibited use of County time and resources by conducting personal business entity's work during County work hours.

DISPOSITION: Substantiated

RECOMMENDATIONS:

1. The Acting Director of OIT, review the agency's policies regarding the appropriate business use of County e-mail and Internet and its alignment with Administrative Procedure 119 - *Electronic Information Policy* and revise accordingly to ensure standardized wording and procedures for clarity.

ACTION(S) TAKEN/RESPONSE(S):

1. OIT will review the agency's policies regarding the appropriate use of County technology resources for standardized wording and clarity. OIT will undertake a comprehensive look at the policy and other associated policies to ensure there are no conflicts, misinterpretations or abuses allowed. OIT will research industry best practices and make a recommendation to leadership on new policy positions.

2. OCS Director provided the appropriate discipline to the respondent.

17. AGENCY: Office of Information Technology (OIT)

ALLEGATION: 19-0113e- Misuse of prestige of office by appointed official in hiring of a family member and friend through a temporary staffing agency.

DISPOSITION: Unsubstantiated

RECOMMENDATIONS:

1. The Director of OCS develop a policy that requires agencies to disclose the names of individuals they are seeking to hire when submitting temporary staffing requests. Agencies also should be required to include the individual's qualifications and disclose any fraternal relationships in compliance with Administrative Procedure 228 - *Fraternization*.
2. The Chief Administrative Officer review County agencies practice of referring individuals to temporary staffing agencies to effectuate a direct hire.

ACTION(S) TAKEN/RESPONSE(S):

1. OIT Director will continually emphasize to staff the need to adhere to the policies, procedures and recommendations outlined in the report.
2. Chief Administrative Officer directed OCS, OMB and OHRM to create a work group to review policies and budget regarding the use of temporary staffing services.

18. AGENCY: Office of Human Resources Management (OHRM)

ALLEGATION: 19-0127e – Prohibited gift from County vendor in providing lunch to agency employees for appreciation for their work.

DISPOSITION: Substantiated

RECOMMENDATIONS:

1. OHRM reimburse the vendor for the costs associated with the luncheon.
2. OHRM disseminate OEA's Guidance on Gifts to all OHRM staff.
3. OHRM send a letter to the vendor advising them to cease refrain from offering any future gifts of appreciation to OHRM employees.

ACTION(S) TAKEN RESPONSE(S):

1. OHRM Director reimbursed the vendor for the costs associated with the luncheon.
2. An email was sent to OHRM staff regarding Guidance on Gifts.
3. OHRM sent a letter to the vendor advising them to cease from offering any future gifts of appreciation to OHRM employees.

19. AGENCY: Department of Permitting, Inspections and Enforcement (DPIE)

ALLEGATION: 19-0147e - County Inspector misuse of County resources when witnessed by citizen

sleeping in a County Vehicle.

DISPOSITION: Unsubstantiated

RECOMMENDATIONS:

1. Although it may be impractical for employees to return to the office to retrieve their personal vehicles prior to taking breaks, OEA recommends the agency provide written guidance for employees regarding the use of County vehicles during breaks and lunch to avoid an appearance of misuse of County resources. The agency should consult with the Office of Law and the Office of Human Resources Management to ensure that all proposed guidelines comply with union and other negotiated agreements that govern the rights of DPIE employees.

ACTION(S) TAKEN/RESPONSE(S):

1. Director of DPIE issued an agency directive which will be effective October 1, 2019, regarding use of the County vehicles.

20. AGENCY: Office of Central Services (OCS)

ALLEGATION: 19-0156e – Employee’s provision of confidential information by disclosing interview questions to candidate for hire.

DISPOSITION: Unsubstantiated

RECOMMENDATIONS:

1. Office of Human Resources Management (OHRM) develop a Countywide written directive that requires County employees involved in interview panels to maintain confidentiality of all information associated with the interview process and disclose extended relationships.
2. OCS consult with OHRM to develop a process for the development of interview questions for classifications of positions within the division.

ACTION(S) TAKEN/RESPONSE(S):

1. OHRM will be rolling out mandatory training for the HR community and managers in the coming months. The mandatory training will address these matters along with a full range of topics connected to HR activity for the full life cycle of County employees.
2. OCS Human Resources Division (HR) has developed a protocol to ensure confidentiality of interview questions prior to interviews to the maxim extent practical. All final interview questions are drafted by HR and sealed until day of interview where such questions are then distributed to interview panel members. This practice ensures that no interview applicant receives the official interview questions prior to interview. This practice is adopted and implemented agency-wide.

21. AGENCY: Department of Permitting, Inspections and Enforcement (DPIE)

ALLEGATION: 19-0157e – Employees’ misuse of prestige of office to harm the professional reputation and business of a County vendor.

DISPOSITION: Substantiated

RECOMMENDATIONS:

1. Because matters involving employee relations fall outside of the jurisdiction of the OEA, OEA recommends the Office of Law (OOL) and DPIE in coordination with the Office of Human Resources Management (OHRM), discuss the actions of employees detailed herein and determine whether any personnel actions should be taken.
2. OOL consult with DPIE and OHRM regarding whether an employee should continue duties with the Electrical Board based on the employee's actions.
3. OOL instruct DPIE to develop a written policy prohibiting DPIE employees and officials from providing any recommendations for engineer professionals to DPIE customers; and from entering into employment relationships with DPIE customers who fall under the agency's jurisdiction.
4. OOL instruct DPIE to develop a written policy and standard operating procedures to address concerns regarding the competency of a professional engineer and/or the quality of their work submitted to DPIE. The policy should detail specific steps DPIE will take in these matters and the consequences for an engineer who fails to remedy the problem (i.e. suspension from submitting plans for review, referral to DLLR, etc.).
5. OOL consult with DPIE to determine which DPIE officials and employees should be responsible for reviewing the work of engineers and making a final determination regarding his ability to sign and seal drawings in Prince George's County.
6. OOL consult with DPIE to make a final determination regarding the status of the other professional engineers DPIE sent notices of suspension.

ACTION(S) TAKEN/RESPONSE(S):

1. At the end of OEA's investigation, the findings were submitted to OOL for review and follow up. The matter is being considered for administrative actions by OOL.

22. AGENCY: REVENUE AUTHORITY

ALLEGATION: 19-0218e- Revenue Authority employee's misuse of County resources when observed in a County vehicle in another municipality while on duty with the County and engagement in secondary employment without agency approval.

DISPOSITION: Unsubstantiated

RECOMMENDATIONS:

1. The Revenue Authority incorporate written guidance in their Vehicle Safety and Usage Policy for employees regarding the use of County vehicles during breaks and lunch to avoid the appearance of abuse of County resources (as previously recommended in a similar case 19-0147e). The Revenue Authority should consult with their attorney and the OOL on the proposed guidelines.

ACTION(S) TAKEN/RESPONSE(S):

1. The Revenue Authority revised the Vehicle Safety and Usage Policy, requiring employees to record their lunch breaks times upon returning to the agency daily.

23. AGENCY: Department of Public Works and Transportation (DPW&T)

ALLEGATION: 19-0239e – Employee’s misuse of prestige of office to improperly provide a consultant firm with certain contract information regarding the County’s Southern Stormwater Ponds project outside of the normal procurement process.

DISPOSITION: Unsubstantiated

RECOMMENDATIONS:

1. The Director of DPW&T in consultation with the Office of Central Services (OCS) and the Office of Law (OOL) develop an agency policy governing the process consultants, current and/or prospective, must follow to make presentations before the agency and its representatives. At a minimum, the policy should address when and how consultants may make presentation to DPW&T.

ACTION(S) TAKEN/RESPONSE(S):

1. After consultation with OCS and OOL, DPW&T will draft and implement an internal policy and SOP regarding requests for presentations by consultants. Pending the implementation of the new policy all presentation requests will be forwarded to the Director’s Office for review and approval. All DPW&T employees will be informed of the new policy, once enacted, and will be required to sign acknowledgment of the policy.