



STRATEGIC PLAN FISCAL YEAR 2019

Office of the Chief Integrity Officer | City of Philadelphia

September 30, 2018

The Strategic Plan is available on the IntegrityWorks website at: www.phila.gov/integrityworks/overview

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ABOUT THE STAFF: OFFICE OF THE CHIEF INTEGRITY OFFICER

Ellen Mattleman Kaplan was appointed Chief Integrity Officer on January 4, 2016. Before joining the Kenney administration, Kaplan was the long-time Vice President and Policy Director for the non-profit, government watchdog Committee of Seventy. Before Seventy, and after serving as Policy Director for Sam Katz’s 1999 mayoral campaign, she was the Director of Policy and Communications for Greater Philadelphia First, an organization of Chief Executive Officers of the region’s largest companies and academic institutions that later became the Greater Philadelphia Chamber of Commerce’s CEO Council for Growth. Kaplan has also served as the Associate Director of Pennsylvanians for Modern Courts and a Philadelphia Assistant District Attorney. Kaplan has a J.D. from Temple University’s Beasley School of Law and an A.B. in History and certificate in Russian Area Studies from Princeton University.

Krystle Baker is Deputy Chief Integrity Officer. Prior to this role, Krystle also served as an attorney investigator with the City of Philadelphia Office of Inspector General for seven years. During that time, she specialized in contract fraud, complex investigations, and compliance related issues. Baker received her law degree from the University of Detroit Mercy and her undergraduate degree in Political Science from Temple University. She holds bar admissions in Pennsylvania and New Jersey and is a Certified Compliance and Ethics Professional (CCEP) and a Certified Fraud Examiner (CFE).

PART I: INTRODUCTION & MISSION

Mayor James F. Kenney, on his first day in office on January 4, 2016, re-established the Chief Integrity Officer position in the Office of the Mayor to “promote honesty, integrity, and transparency and accountability throughout the Executive and Administrative Branch in the day to day operations of City government.”¹

The Office of the Chief Integrity Officer (“Office”), initially created by former Mayor Michael A. Nutter, plays a critical role in City government. Preventing wrongdoing *before* it occurs avoids the corrosive impact misconduct has on citizens’ trust in their government.

The mission of the Office is to uphold the public’s trust by ensuring that the City operates with fairness and integrity, uncompromised by conflicts of interest, political affiliation, favoritism, or other unfair considerations.

Reporting directly to the Mayor, the Office works throughout the Executive and Administrative Branch to:

1. Monitor all aspects of City procurement and contracting; the disposition of City property, facilities and equipment and the provision of City services to ensure their operations are in compliance with the law and are being conducted in an open, honest and transparent manner;
2. Create and support a comprehensive program for the identification, prioritization and management of compliance risk to proactively prevent wrongdoing;
3. Deliver trusted advice and guidance to the Mayor, City officials, employees, boards and commissions and vendors about applicable City and mayoral ethics laws and policies, including the receipt of gifts;
4. Oversee the regulatory environment in which city departments, agencies, authorities, boards and commissions operate to assure adherence to ethical standards, as well as efficient and timely reporting, as mandated by the Mayor, City and State;
5. Provide education on ethics rules and Mayor’s Executive Orders through employee trainings, communications and on its website: www.phila.gov/integrityworks;
6. Improve transparency and accessibility to City information and open data; and,
7. Handle other projects, as directed by the Mayor.

¹ Executive Order No. 02-16, Office of the Chief Integrity Officer.

Core Values, Mission, and Vision

Core Values

Core Values are the fundamental and lasting principles that guide our work.

They shape everything we strive to do.

Our Core Values are:

**ETHICS INTEGRITY TRANSPARENCY RESPONSIVENESS
PREVENTION**

Mission

Our Mission is the reason our Office exists.

It is why we do what we do.

Our Mission is:

**TO UPHOLD THE PUBLIC'S TRUST BY ENSURING THAT THE CITY OPERATES WITH FAIRNESS
AND INTEGRITY, UNCOMPROMISED BY CONFLICTS OF INTEREST, POLITICAL AFFILIATION,
FAVORITISM, OR OTHER UNFAIR CONSIDERATIONS.**

Vision

The Vision is what we believe can be achieved through our work.

It is what we want to see for the City of Philadelphia.

Our Vision is:

**THE CITY OF PHILADELPHIA IS A MODEL FOR ETHICAL AND TRANSPARENT OPERATIONS
AND INSTILLS PUBLIC CONFIDENCE.**

Part II: Chief Integrity Officer Executive Order No. 02-16

EXECUTIVE ORDER NO. 2-16

OFFICE OF THE CHIEF INTEGRITY OFFICER

WHEREAS, the citizens of Philadelphia (“citizens”) have bestowed a public trust on their government and have a right to expect that their government embodies unassailable principles of integrity, transparency and accountability; and

WHEREAS, the citizens must have confidence that their government operates, and public officials and employees act, according to the highest ethical standards and without improper influence or considerations other than the best interest of the public; and

WHEREAS, it is incumbent upon public officials and employees to avoid real or perceived conflicts of interest that could undermine the citizens’ trust; and

WHEREAS, the City of Philadelphia (“City”) must develop policies, procedures and protocols to promote integrity, transparency and accountability within government and ensure adherence to these policies, procedures and protocols by public officials and employees;

NOW, THEREFORE, I, JAMES F. KENNEY, Mayor of the City of Philadelphia, by the powers vested in me by the Philadelphia Home Rule Charter, do hereby order as follows:

SECTION 1. Chief Integrity Officer.

The position of Chief Integrity Officer (“CIO”) is hereby re-established and continued in the Office of Mayor to promote honesty, integrity, transparency and accountability throughout the Executive and Administrative Branch in the day to day operations of City government. The CIO shall report directly to the Mayor.

SECTION 2. Responsibilities.

Specific responsibilities assigned to the CIO by the Mayor shall include, but are not limited to:

(1) **Integrity of City Operations.** Monitor and review, and as necessary, create or recommend, policies and procedures to ensure that the following areas of activity in the Executive and Administrative Branch are in compliance with the law and conducted in an open, honest and transparent manner:

- (a) All aspects of City procurement and contracting;
- (b) The disposition and use of City property, facilities and equipment;
- (c) The provision of City services; and
- (d) Others at the direction of the Mayor.

When, with respect to the foregoing matters, the CIO receives a complaint or otherwise becomes aware of any conduct that is unethical, unlawful or otherwise inconsistent with the aims of this Executive Order, she or he may look into the issue and, if necessary, shall promptly refer it to the appropriate entities as prescribed in this Executive Order.

(2) **Compliance Program.** Create, support, and monitor a comprehensive program for the identification, prioritization and management of compliance risk throughout the Executive and Administrative Branch. The purpose of such program shall be to prevent potential wrongdoing, misfeasance, and other conduct that could undermine the public's trust in government, by proactively addressing and recommending strengthened City policies, procedures and protocols, and Mayor's Executive Orders, designed to promote integrity, transparency and accountability.

(3) **Advice and Support.** Serve as an advisor to the Mayor, City officials, employees, boards and commissions and vendors about applicable laws, policies, procedures and Executive Orders related to integrity, transparency and accountability within government. The CIO shall give advice and support not merely on complying with affirmative requirements, but also on conducting City business in a rigorously ethical and forthright manner that promotes public confidence.

(4) **Reporting and Oversight.** Provide oversight and support to City departments, agencies, authorities, boards and commissions regarding the City's regulatory environment to ensure that covered employees are aware of the requirements, that mandatory reporting is completed in an efficient and timely manner, and that ethical standards are adhered to.

(5) **Education and Communication.** Through trainings, internal and external communications and other methods of dissemination, increase awareness within the City's workforce and within the general public of the City's policies, procedures, protocols and Mayor's Executive Orders related to integrity, transparency and accountability.

(6) **Transparency.** Improve access to City information, promote open data initiatives and support use of City data both within City government and outside it, and engage the public in order for the City to become a model for transparent government operations.

(7) **Other Duties.** Perform such other duties as directed by the Mayor.

SECTION 3. Coordination and Cooperation.

(1) The CIO shall coordinate with City departments, agencies, authorities and boards and commissions to provide training and informal advice related to integrity, transparency and

accountability within City government. All such entities are directed to cooperate with the CIO in the performance of the CIO's duties and responsibilities hereunder.

(2) The CIO shall work in coordination and cooperation with the Office of the Inspector General ("OIG") and shall report to the OIG all matters requiring the investigation and resolution of instances or patterns of fraud, waste, corruption, misconduct or abuse of office related to the operations of City government or those who transact business with the City or receive financial benefits from the City.

(3) The CIO and OIG shall jointly develop and implement training programs to correct systemic problems and prevent future misconduct within City government.

(4) The CIO shall work in coordination and cooperation with the Philadelphia Board of Ethics ("BOE") and shall report to the BOE whenever the CIO determines that a violation of the City's Ethics Code, Lobbying Code, Campaign Finance Law, and Home Rule Charter restrictions on political activity, gratuities and interests in certain City contracts may have occurred.

(5) The CIO shall work with the BOE to jointly develop and implement appropriate training programs and other communications with public officials and employees within the jurisdiction of the CIO and with businesses that are seeking or doing business with the City that support and reinforce the mission and goals of the CIO set forth in this Executive Order.

(6) The CIO shall work in coordination and cooperation with the Law Department to report all matters in which the City may appropriately seek redress for damages or loss caused by unlawful or unethical conduct by any person or entity for such action as the City Solicitor may deem appropriate.

(7) The CIO shall conduct all activity in a manner that does not interfere with the performance of the duties of the OIG, BOE or Law Department or other law enforcement authorities.

SECTION 4. Deputies.

Subject to the advance approval of the Mayor, the CIO may hire deputies and assistants to aid in carrying out the CIO's responsibilities herein.

SECTION 5. Rescission of Existing Executive Orders

Executive Order 2-08 (Relating to Office of Chief Integrity Officer) is hereby rescinded.

SECTION 6. Effective Date.

This Order shall take effect immediately.

Date 1/4/16

James F. Kenney
James F. Kenney, Mayor

Part III: Fiscal Year 2019 Projects & Goals

Quarterly updates of all projects detailed in this Strategic Plan will be posted on the [IntegrityWorks website](#).

| Responsibility per CIO Executive Order | Project Description | Deadline | Planning | On-Track | Behind Schedule | Completed | Completion Date | Status Updates |
|--|--|----------|----------|----------|-----------------|-----------|-----------------|--|
| Advice and Support | Provide timely and accurate advice to Executive and Administrative Branch employees, members of Boards and Commissions, vendors and the public about laws, policies, regulations and Executive Orders related to integrity, transparency and accountability within government. Refer matters to the Inspector General and Board of Ethics, as needed. Issue bi-annual updates on the inquiries resolved by the office during each fiscal year. | On-going | | X | | | | The most recent report is available on the IntegrityWorks website . |
| Compliance Program | Issue guidance to registered lobbyists regarding compliance with the Gifts Executive Order. | Dec-18 | X | | | | | Originally planned for FY18Q4, the issuance date was pushed back to FY19Q2 to coincide with the 2018 holiday season. |
| Compliance Program | Enact Executive Order to prevent conflicts of interest in the "Revolving Door" into City government. | Jun-19 | X | | | | | Conduct research into policies in other jurisdictions and draft an Executive Order for consideration by the Mayor. If signed, office will provide ongoing guidance to incoming Executive Branch employees. |
| Compliance Program | Ensure 100% compliance by top Executive Branch officials with annual financial disclosure filing and ethics refresher training requirements. | May-19 | | X | | | | One hundred percent (100%) compliance with the May 1, 2018 Financial Disclosure Statement filing requirement, and with the FY18Q2 annual ethics refresher |

| Responsibility per CIO Executive Order | Project Description | Deadline | Planning | On-Track | Behind Schedule | Completed | Completion Date | Status Updates |
|--|---|----------|----------|----------|-----------------|-----------|-----------------|---|
| | | | | | | | | training, was achieved by the Mayor and currently serving top Executive Branch officials. The next ethics refresher will take place during Integrity Week, FY19Q2. |
| Compliance Program | Conduct comprehensive Ethics Survey of all City employees every two years to seek employees' views about the ethical culture of the City, identify their key concerns and assess their knowledge of ethics resources, e.g., Chief Integrity Office, Inspector General, Board of Ethics. | Nov-18 | | X | | | | The next Ethics Survey will take place in FY19Q2. |
| Compliance Program | Participate in internal working group monitoring the implementation of the Executive Order on Sexual Harassment Prevention in City Government that was signed by Mayor Kenney in July 2018. | On-going | | X | | | | |
| Education and Communications | Utilize Integrity Officers to ensure a steady flow of relevant and timely ethics-related information within their departments, offices and agencies; to coordinate department-specific ethics trainings; and to determine interests/needs of their employees. | On-going | | X | | | | Liaisons to our office from Executive branch departments, offices and agencies ("Integrity Officers") were appointed in FY18Q2. Bi-annual meetings are held with the Integrity Officers. |
| Education and Communications | Issue bi-annual IntegrityWorks newsletter. | On-going | | X | | | | The June 2018 newsletter is available on the IntegrityWorks website . |
| Education and Communications | Create in-person and online Ethics trainings for the City's Executive Branch workforce. | On-going | | X | | | | Develop educational materials, one-pagers, power points, online presentations, etc. regarding ethics-related matters including, but not limited to, gifts, whistleblower protections, outside |

| Responsibility per CIO Executive Order | Project Description | Deadline | Planning | On-Track | Behind Schedule | Completed | Completion Date | Status Updates |
|--|--|----------|----------|----------|-----------------|-----------|-----------------|--|
| | | | | | | | | employment, political activity (with the Board of Ethics) and the Philadelphia Code Chapter 17-1400 (Non-Competitively Bid Contracts; Financial Assistance). |
| Education and Communications | Host Integrity Week annually. | Nov-18 | | X | | | | Nearly 300 employees attended five programs during Integrity Week 2017, FY18Q2. A status report on Integrity Week 2018 will be posted in the FY19Q2 quarterly update. |
| Education and Communications | Move IntegrityWorks website to the new Beta.phila.gov Platform. | Feb-19 | X | | | | | The City is embarking on a multi-phase update and migration of all City departmental websites to the new Beta platform. |
| Education and Communications | Participate in the annual COGEL (Council on Governmental Ethics Laws) Conference in Philadelphia from December 9-12, 2018 | Dec-18 | | X | | | | |
| Integrity of City Operations | Work with the Chief Administrative Officer and other City departments to create internal guidance on issues related to the integrity of the City's contracting and procurement processes, vendor communications and advertising. | On-going | X | | | | | A memorandum on Contracts Policy changes was issued in FY19Q1. |
| Integrity of City Operations | Participate in internal working group to develop proposed amendments to Chapter 17-1400 of the Philadelphia Code and establish regulations to clarify existing provisions. | On-going | X | | | | | Revisions to the ordinance by our office, in partnership with the Law Department, Office of the Chief Administrative Officer, and the Contracts Legislation Unit are being reviewed. |
| Integrity of City Operations | Review of Administrative Board Policies and Processes. | On-going | | X | | | | As of September 2018, 47 of 54 rules have been reviewed and |

| Responsibility per CIO Executive Order | Project Description | Deadline | Planning | On-Track | Behind Schedule | Completed | Completion Date | Status Updates |
|--|---|----------|----------|----------|-----------------|-----------|-----------------|---|
| | | | | | | | | updated, if necessary, or in some cases, rescinded. |
| Integrity of City Operations | Monitor the implementation of programs funded by the City of Philadelphia beverage tax: Rebuild, PHLPreK, Community Schools. Participate in internal groups addressing ethics-related issues involving the three initiatives, e.g., contract compliance, communications with vendors. The Chief Integrity Officer serves on the Rebuild Oversight Board, which meets quarterly. | On-going | | X | | | | |
| Integrity of City Operations | Partnered with the Rebuild team to develop a Rulebook and Resource Guide to ensure that Rebuild program dollars are spent efficiently, effectively, and with integrity and that all program requirements are met. | Sept-19 | | | | X | | |
| Transparency | Post online the Financial Disclosure Statements of the Mayor, top Executive Branch officials and members of selected Boards and Commissioners that exercise significant governmental powers. | Jul-19 | | X | | | | Financial Disclosure Statements are posted on the Records Department website. |

Appendix A: Inquiries Resolved by the Office of the Chief Integrity Officer: Annual Report
July 1, 2017 – June 30, 2018

| Inquiry Totals: July 1, 2017 - June 30, 2018 | |
|--|------|
| Total # of Inquiries ¹ : | 1001 |
| Total # of Referrals ² : | 56 |
| Average # of Days to Resolve (Gift Inquiries): | 2 |
| Average # of Days to Resolve (All Inquiries): | 5 |

| Category | Total # of Inquiries | Avg. Time to Resolve (Days) | % of Total Inquiries Received |
|-----------------------|----------------------|-----------------------------|-------------------------------|
| GIFTS | 333 | 2 | 33% |
| OTHER ³ | 70 | 13 | 7% |
| COMMUNICATIONS | 85 | 2 | 8% |
| CONFLICTS OF INTEREST | 56 | 4 | 6% |
| CONTRACTS | 27 | 10 | 3% |
| POLITICAL ACTIVITY | 40 | 3 | 4% |
| OUTSIDE EMPLOYMENT | 18 | 2 | 2% |
| PROJECTS ⁴ | 14 | 106 | 1% |
| TRAINING | 14 | 1 | 1% |
| FINANCIAL DISCLOSURES | 308 | 1 | 31% |
| DONATIONS | 22 | 4 | 2% |
| NEPOTISM | 5 | 1 | 0% |
| PRE-EMPLOYMENT | 2 | 1 | 0% |
| POST-EMPLOYMENT | 6 | 2 | 1% |
| CAMPAIGN FINANCE | 1 | 2 | 0% |

¹ Inquiries are questions or issues brought to the attention of the Office of the Chief Integrity Officer for resolution. These inquiries may include requests for guidance on a particular matter or require longer-term engagement by the Office.

² The Office refers matters to other entities when it is beyond the Office's jurisdiction to provide guidance on a particular issue or question.

³ The "Other" category refers to questions or issues that do not fall within one of the standard categories detailed above. For example, the other category may capture citizen inquiries that are unrelated to the work of the Office but require follow-up.

⁴ The "Projects" category refers to inquiries that require longer-term involvement or follow-up by the Office and/or short-term projects generated by the Office that are not captured by the projects detailed in the Office's Strategic Plan.