

**SUBCOMMITTEE REPORT**

(Please use one report for each subcommittee recommendation)

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|-----------------------------------|--|
| Subcommittee Name                 | Compliance   |
| Subcommittee Chairperson(s)       | Amy March  |
| Title of recommendation           | Establish and implement a compliance and ethics program for the City   |
| Describe the recommendation       | <p><u>100 days</u></p> <ul style="list-style-type: none"> <li>• Define roles and responsibilities</li> <li>• Develop risk assessment protocols to include defined tasks, target dates and questionnaire</li> <li>• Develop a training plan</li> <li>• Identify internal and external reporting requirements</li> </ul> <p><u>6 months</u></p> <ul style="list-style-type: none"> <li>• Institute an anonymous helpline/hotline</li> <li>• Develop ethics reporting requirements to include anti-retaliation measures</li> <li>• Complete risk assessment interviews and identify remediation plans for any control gaps</li> <li>• Establish both an internal and external compliance and ethics website <ul style="list-style-type: none"> <li>○ Dashboard metrics/statistics</li> <li>○ Publish financial disclosures</li> <li>○ Information on how to report ethics/compliance concerns from both internal and external sources</li> </ul> </li> <li>• Identify testing programs for auditors</li> </ul> <p><u>1 year</u></p> <ul style="list-style-type: none"> <li>• Complete remediation plan</li> <li>• Complete testing activities for high risk areas</li> <li>• Create compliance plan for upcoming year revising program based on results of risk assessment and testing activities</li> <li>• Develop annual report detailing accomplishments of program and goals and objectives for upcoming year</li> </ul> |
| Is this an immediate or long term | Both   |

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|--|--|
| recommendation?  |  |
| How will this address our challenges or reach our goals? | Create an accountable and transparent government   |
| What are the obstacles to implementation?                | Time, staff, funding   |
| Who needs to be involved?                                | Solicitor's office, Resources to perform compliance audits (i.e., 3 <sup>rd</sup> party firm, controller's office), Technology group, Department heads |
| What city resources need to be invested?                 | People, website technology, database resources   |
| What will be different if the recommendation is adopted? | An accountable, transparent government   |
| Describe any background materials that you consulted     | Other Cities, Pennsylvania State Ethics Commission, Other company programs, Compliance and Ethics Leadership Council (CELC)                            |
| Have other cities implemented this recommendation?       | Yes, Jacksonville  |
| Are there any other considerations?                      | Budget constraints, potential competing priorities   |

We request that each recommendation be submitted by the subcommittee Chairperson to Kevin Acklin and your Committee Chair by **5:00 pm on Friday, December 27.**