

# Quarterly Report

3<sup>rd</sup> Quarter

July 1, 2023 – September 30, 2023



October 16, 2023

**Ellen Ha, Esq., CIG  
Inspector General**

## Message from the Inspector General



From time to time, the Office of Inspector General (OIG) finds no fraud, abuse, waste, or corruption (FAWC) after an investigation is completed, but we still believe it is necessary to make certain recommendations to various departments and agencies. Such recommendations tend to confuse some individuals, so I am taking this opportunity to explain why the OIG makes recommendations when we find no FAWC.

The 2012 Charter of the City of Detroit not only requires that the OIG investigate matters concerning FAWC, but it also requires the OIG to prevent FAWC. The recommendations we make after we complete our investigation or audit applies to the latter duty of the OIG. Preventing FAWC is just as important as investigating or auditing an allegation of FAWC.

Often, during an investigation or an audit, we discover a risk of FAWC that is not properly addressed by the existing policies and procedures in place. When this happens, the OIG makes recommendations to address the vulnerabilities that could lead to FAWC if left unaddressed. Recommendations made to prevent FAWC, whether made on actual findings of FAWC or the perceived risk of FAWC, should be thoroughly reviewed by the department and given adequate consideration. There are times when the OIG's recommendations, while well-intended, may be impracticable. In those instances, it is important that the department find a reasonable resolution to prevent the risk of FAWC identified by the OIG. It is important to note that just because the OIG makes recommendations does not necessarily mean that something wrong happened or that someone did anything wrong.

Lastly, we often suggest that the department or the agency consult the Law Department or legal counsel when considering and making changes to the existing policies or process. This suggestion does not mean that someone committed an illegal activity. It simply means that whatever changes are made, the changes should be within the law and in alignment with other City policies, collective bargaining agreement, or memorandum of understanding with other governmental agencies.

It is my sincere hope that I have clarified one of the many reasons why we do what we do. Having said that, the following pages contain information of what we did during the third quarter of 2023. In this report, you will also find a list of the current and ongoing recommendations we have made to various City departments as well as the status of our recommendations.

## **Introduction**

Prior to filing for bankruptcy in 2013, the City of Detroit suffered another negative historic moment in 2008. At the request of the Detroit City Council, then Governor Jennifer Granholm presided over a forfeiture hearing of then Mayor Kwame Kilpatrick, who was criminally charged with public corruption and eventually sentenced to a lengthy prison term.

Shortly thereafter, the 2009 Charter Commission was created to review and recommend certain revisions to the Charter. The people of the City of Detroit later adopted the Commission's recommendations on November 8, 2011, to ensure such negative history does not repeat itself. The 2012 Detroit City Charter therefore contains lessons learned in 2008 and the prior years.

More specifically, the 2012 Charter of the City of Detroit created the Office of Inspector General (OIG); and provided the OIG with independent authority "to ensure honesty and integrity in City government."

Although the creation of the OIG appears to make the Inspector General (IG) omnipotent over all branches of City government and contractors, its powers are limited under the Charter. Specifically, Section 7.5-305 of the Charter limits the jurisdiction of the IG to "the conduct of any Public Servant and City agency, program or official act, contractors and subcontractors . . . business entities . . . and persons" seeking certification or who are participating in "any city programs."

Section 7.5-306 of the Charter further restricts the power and the authority of the IG to "investigate. . . in order to detect and prevent waste, abuse, fraud and corruption;" and to report such matters and/or recommend certain actions be taken in accordance with Sections 7.5-308 and 311. To conduct such investigations, Section 7.5-307 of the Charter provides the IG with the power to subpoena witnesses and evidence; to administer oaths and take testimony of individuals; to enter and inspect premises; and to enforce the same.

The Charter further requires that every public servant, contractor, subcontractor, licensee, applicant for certification to cooperate in the IG's investigation, as failure to do so would subject that person "to forfeiture of office, discipline, debarment or any other applicable penalty." See Section 7.5-310.

To encourage individuals to report "waste, abuse, fraud and corruption," Section 7.5-313 requires all investigative files to be confidential except where production is required by law; and Section 7.5-315 prohibits retaliation against any persons who participate in the IG's investigation. In keeping with due process, Section 7.5-311 of the Charter requires that when issuing a report or making recommendations "that criticizes an official act," the affected party be allowed "a reasonable opportunity to be heard at a hearing with the aid of counsel."

Since all governmental bodies must be held accountable in their role, the Charter requires that the IG issue quarterly reports to the City Council and the Mayor, which shall be made public and published on the City's website. See, Section 7.5-306.

The Detroit Office of Inspector General is a proud and active member of the Association of Inspectors General (AIG). The Association is the professional organization for offices dedicated to government accountability and oversight. The Detroit Office of Inspector General was founded

on the model principals of the Association, and the OIG staff participated in AIG training and received their certification in their area of discipline.

### **How OIG Complaints Are Resolved**

All complaints submitted to the OIG, regardless of the method, are given a complaint number and assigned to an OIG staff member for further review. Based on initial review of the complaint, the Inspector General may:

- 1) Close the complaint and open an investigative file with a new file number;
- 2) Have an OIG employee follow-up with the complainant to obtain additional information pertaining to the complaint; or
- 3) Close the complaint without opening an investigation.

If the Inspector General elects to close the complaint without opening an investigation, one or more of the following actions will be taken:

- 1) The OIG will send a letter or an email to the complainant, or call the complainant, stating that we have decided not to investigate your complaint or that we are closing the complaint;
- 2) Refer the complaint to another department, agency, or legal entity, such as the City's Ombudsman's Office, Detroit Police Department, City of Detroit Buildings, Safety Engineering, and Environmental Department, Wayne County Sheriff or Prosecutor's Office, FBI, Michigan Department of Health and Human Services, or a legal aid office; or
- 3) The OIG will close the complaint without notifying the complainant. This usually occurs when the complainant has not left contact information or if the OIG does not believe it is appropriate to contact the complainant<sup>1</sup>.

Based on the OIG's historical data, most of the complaints received by the OIG do not result in an investigation. However, every complaint is carefully reviewed before the complaint is closed without additional action or referred to another agency. For more information on how complaints are resolved, please visit [www.detroitmi.gov/inspectorgeneral](http://www.detroitmi.gov/inspectorgeneral).

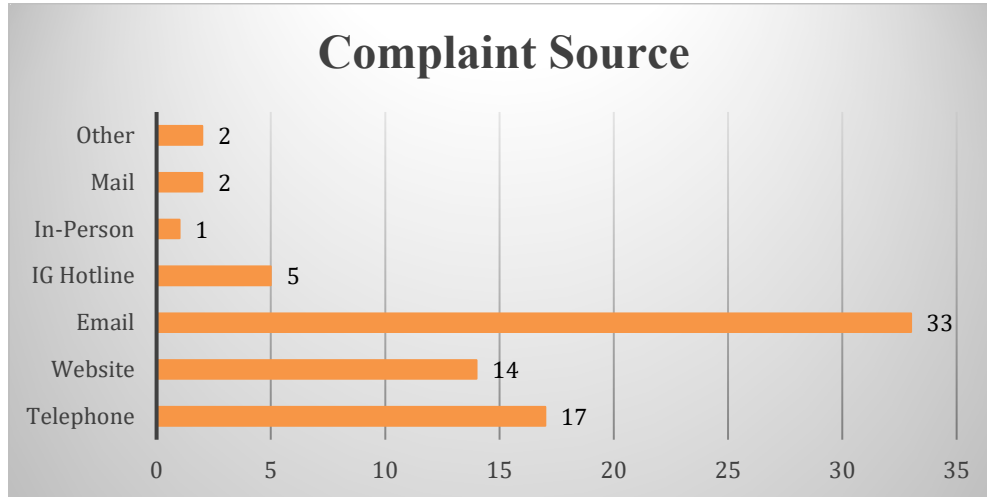
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<sup>1</sup> For example, on occasion, two complainants with competing interests will file separate complaints with the OIG. If the OIG has a reasonable suspicion that criminal charges may result from a law enforcement investigation, the OIG will not notify either complainant before referring the case and closing it.

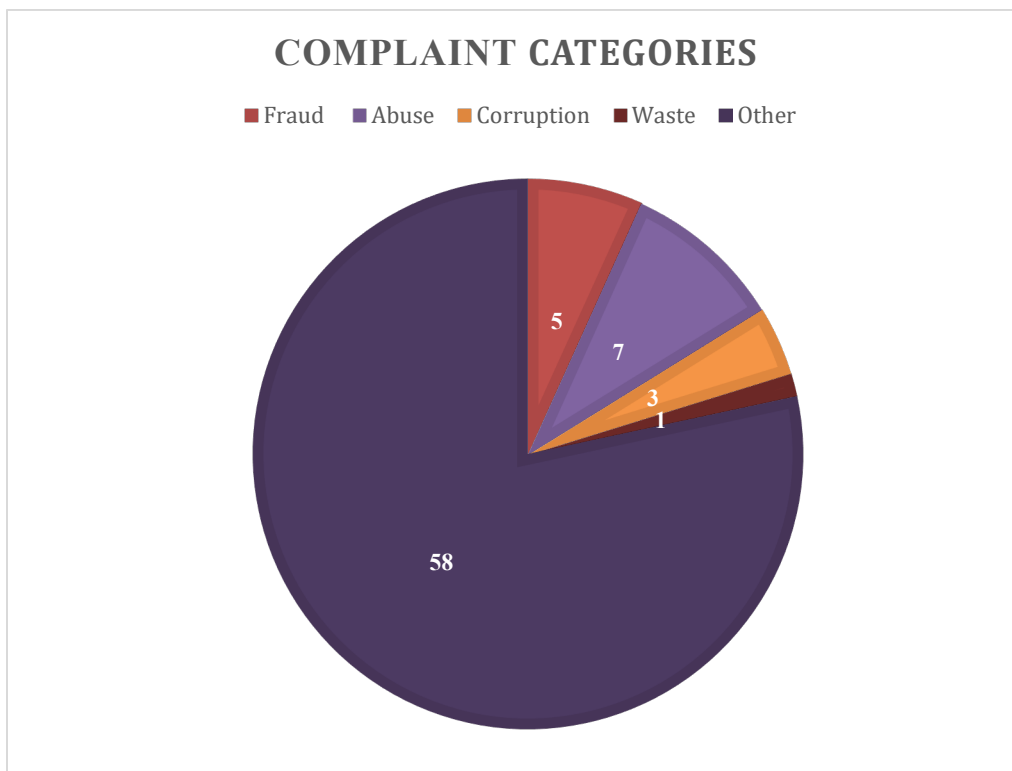
## 2023 3<sup>rd</sup> QUARTER COMPLAINT STATISTICS

(July 1, 2023 – September 30, 2023)

### Sources of Complaints Received by the OIG in the 3<sup>rd</sup> Quarter



### Categories of Complaints Received by the OIG in the 3<sup>rd</sup> Quarter



## How Complaints Were Resolved by the OIG in the 3<sup>rd</sup> Quarter

Complaints Pending Prior to Quarter	4
Complaints Received During the Quarter	74
<b>Total</b>	<b>78</b>
Open investigative files	5
Open audit files	0
Pending	7
Referral	32
Decline investigation (No Action)	34
<b>Total</b>	<b>78</b>

The statistics above show the OIG actively worked on 78 complaints this quarter. By the end of the quarter, 37 of the 78 complaints were resolved by either opening a new investigation or referring the matter to the appropriate agency for investigation. The OIG declined to investigate 34 of the 94 complaints. As of September 30, 2023, the OIG still had 7 complaints pending.

## **How OIG Investigations Are Conducted and Resolved**

The OIG may initiate an investigation based on information received in the complaint or on its own initiative.

An investigation is initiated when an Investigative File is opened and an auditor(s) and/or investigator(s) is/are assigned to the file.

An investigation would generally involve one or more of the following:

- 1) Interview of complainant(s) and/or witness(es);
- 2) Acquisition of evidence and/or documents and review of the same; and
- 3) Analyses of the evidence and/or documents reviewed, including forensic audit or review.

An OIG investigation may result in findings by the OIG which substantiate the complainant's allegation of waste, abuse, fraud or corruption in the City's operation or personnel or that of its contractors and/or subcontractors.

In some instances, although the complainant's allegations do not equate to waste, abuse, fraud or corruption, during the investigation of the allegations, the OIG may find other evidence of waste, abuse, fraud or corruption that was not contained in the initial complaint. In such instances, the OIG may initiate an investigation on its own initiative.

Likewise, if the investigation reveals that criminal activity may be involved, pursuant to Section 7.5-308 of the 2012 Charter of the City of Detroit (the Charter), the Inspector General is required to "promptly refer the matter to the appropriate prosecuting authorities."

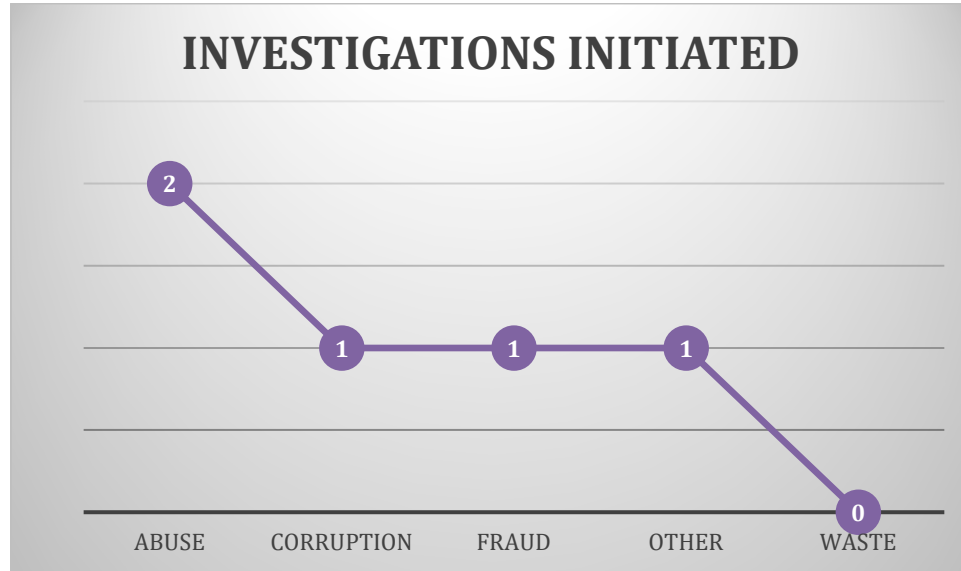
Pursuant to Section 7.5-311(1) of the Charter, "no report or recommendation that criticizes an official act shall be announced until every agency or person affected [by the report or recommendation] is allowed a reasonable opportunity to be heard at a hearing with the aid of counsel." Therefore, when our draft findings are critical, we send a copy of our draft findings, either as a draft memorandum or as a draft report to the affected parties. Thereafter, pursuant to the OIG's Administrative Hearing Rules (Hearing Rules), the parties have 14 calendar days to either provide a written response and/or seek an administrative hearing. Reports and memorandums are not finalized until the Administrative Hearing process has concluded. For additional information on this process, please visit our website at [www.detroitmi.gov/inspectorgeneral](http://www.detroitmi.gov/inspectorgeneral).

The OIG summarizes the findings of the investigation in the OIG's final memorandum. At times, the OIG can elect to issue a formal final report instead of an internal memorandum. All formal final reports have been and will continue to be published on-line. In addition, from time to time, we exercise our discretion to publish some of our internal memoranda through the City and the OIG's website at: [www.detroitmi.gov/inspectorgeneral](http://www.detroitmi.gov/inspectorgeneral). For more information on what type of reports and memorandums are published, please visit our website. You can also find copies of previously posted reports and memorandums.

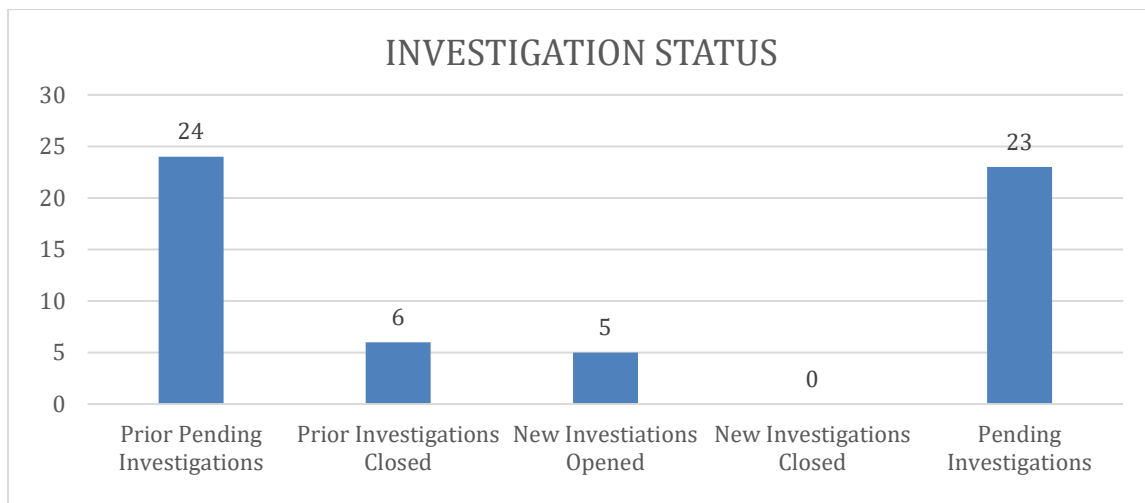
## 2023 3<sup>rd</sup> QUARTER INVESTIGATION STATISTICS

(July 1, 2023-September 30, 2023)

### Categories of OIG Investigations Initiated by the OIG in the 3<sup>rd</sup> Quarter



### Status of OIG Investigations in the 3<sup>rd</sup> Quarter



The statistics above show the OIG had 29 active investigations during the quarter. By the end of the quarter, 6 of the 29 investigations were closed. As of September 30, 2023, the OIG still had 23 investigations pending.



## **Summary of Investigations Closed in the 3<sup>rd</sup> Quarter of 2023**

The following reflects the six investigations the OIG closed in the 3<sup>rd</sup> Quarter of 2023 with an accompanying synopsis for each investigation.

### **22-0009-INV**

On June 24, 2022, the OIG received an email from the Board of Ethics (BOE), requesting that the OIG investigate alleged defamatory and fraudulent statements made by a City of Detroit (City) employee. The BOE initially received the complaint that alleged the employee treated Prospective Bidder A with contempt and disrespect. The complainant alleged that the statements in question were made during the bidding process for a new City sign language interpretive services contract or American Sign Language (ASL) contract and that the statements were made to steer the awarding of the ASL Contract to another party. Prior to referring the matter to the OIG, the BOE investigated the allegations submitted by the complainant to determine if there was willful neglect of duty and improper use of an official position. The BOE determined that the complaint did not allege facts sufficient to constitute a violation of the City's Ethics Ordinance.

Based on the evidence gathered and reviewed by the OIG, we cannot substantiate that any waste, fraud, or abuse occurred. There is no evidence to support the allegation the employee made false statements regarding Prospective Bidder A to influence the bid evaluation for a new contract. There is no evidence to support the allegation the employee had an improper relationship with the owner of the Prospective Bidder C, who submitted a collaborative bid with Prospective Bidder B. Therefore, there is no evidence Prospective Bidder B won the contract based on the alleged improper relationship. Finally, there is no evidence to support that the employee's alleged bias resulted in lower scores being given to BHIS in the bid evaluation process.

During the investigation, the OIG also identified vulnerabilities in the procurement process that create a risk for abuse. The OIG also discovered fees included on the invoices from the vendor that were not listed in the fee schedule of the contract. Based on the above, the OIG made the following recommendations to OCP:

- Training for all city employees involved in the procurement process should be completed prior to bid evaluations.
- ODFS should review all invoices submitted by the vendor for any improper charges and take appropriate action, including requiring reimbursement for any improper charges.
- The OCP SOP should be updated to reflect policies and procedures that are currently utilized or practiced by OCP but not in writing, such as collaborative contracts.
- OCP should revise their SOP and further review and amend the terms any current contract to be consistent with the OCP SOP to provide clarity and guidance on how to properly handle joint bid responses.
- Ensure that the omissions referenced in this report are included in future contracts.

## **22-0013-INV & 23-0001-INV**

The OIG received two separate complaints alleging abuse of authority by two employees of the Department of Public Works (DPW). The complaints alleged the employees committed time fraud and violated City of Detroit (City) policies and procedures. One complaint alleged that an employee committed time fraud by driving a City owned vehicle home, regularly spending time at home during working hours. The complaint also alleged the employee abused their authority as a DPW employee to obtain a handicap parking sign in front of their home. The second complaint alleged the second employee did not record their work hours accurately and violated the City's Vehicle Use policy by taking a vehicle home.

Regarding the first complaint, the OIG found no evidence the employee committed fraud related to spending time at home during their work hours or to obtain the handicap parking sign in front of their home. Similarly, the OIG found no evidence the second employee committed time fraud. The OIG found evidence no evidence of abuse of authority because:

1. Both employees were unaware of the City Vehicle Use policy, nor were their immediate supervisors. Therefore, they were not aware their actions were in violation of the policy.
2. City policies and procedures require employees to enter their time accurately, not daily. Therefore, the second employee did not violate City policies and procedures by entering their time on a weekly basis. Furthermore, because of the employees' position, the Human Resources Department did not issue the employee a swipe card. As such, they were allowed to enter their time online, instead of using a time clock.

Based on the OIGs finding, we recommended the Office of the Chief Financial Officer revise the City policies and procedures to clarify the requirement that hourly employees must enter their time each workday. In addition, the OIG recommended DPW administration require all employees who drive City vehicles to read and sign copies of the City's Vehicle Use policy. These actions will reduce the risk of waste, fraud and abuse related to employees being paid for time they did not work and misuse of City assets.

## **22-0018-INV**

The OIG received a complaint alleging potential fraud in connection with backfilling operations and load tickets submitted by a vendor. More specifically, the complaint alleged that a supervisor instructed a subordinate to place names and addresses on load tickets that did not correspond to the actual drivers and addresses to which the trucks were deployed. The complaint further alleged that backfill materials were coming from unapproved sources, and this activity had been ongoing for several months. The OIG's initial review of evidence revealed that several demolition sites received passing backfill inspection grades based on what appeared to be staged piles of dirt, one or more days before the backfilling was completed. If true, the potential fraud alleged in the complaint would also extend to backfill monitoring/inspections. Accordingly, the OIG expanded its investigation to determine if the backfill monitors, called field liaisons, also engaged in any improper conduct related to their monitoring and inspection duties.

The OIG interviewed key Detroit Demolition Department (3D) staff to determine the policies and procedures related to the City's Backfill Monitoring/Inspection requirements. The OIG also interviewed several employees of the vendor, including the company's owner, to determine their policies and practices related to backfilling operations and data submissions to the City of Detroit

(City). In addition, the OIG reviewed numerous backfill load tickets, compliance forms, and backfill inspection data related to approximately 140 demolition sites assigned to the vendor.

The OIG did not find evidence to substantiate the allegations that the vendor submitted fraudulent load tickets that falsely identified the source of materials, volumes, and/or drivers of the loads. The OIG also did not find any evidence that subcontractors are hauling and delivering materials for the vendor from unapproved sources. Finally, the OIG did not find that field liaisons engaged in fraudulent activity in completing backfill inspection grades and reports. Despite the appearance that backfill inspection grades had been awarded prematurely, the OIG found that 3D's field liaisons performed the inspections in accordance with 3D's relevant policies and procedures. Although the OIG did not find evidence of fraud, we note that the vendor's practices related to backfill load tickets led to questionable document submissions that may expose risks in 3D's *Documentation Policy* and in its *Demolition Program Compliance Checklist Guidance* ("*Compliance Guidelines*"). Therefore, to prevent potential waste, abuse, fraud, or corruption in backfilling operations, the OIG recommends, among other things, that 3D work with its contractors to develop a data documentation policy and/or procedure that can better ensure dirt is properly tracked from source to site.

### **23-0003-INV**

The OIG received a complaint alleging that a vendor was fraudulently using a license (or licenses) belonging to the entity's former owner to perform demolitions and demo-related services for the City of Detroit. The complaint further alleged that the vendor's current owners are fraudulently signing its former owner's name to State of Michigan Notification of Intent to Renovate/Demolish forms (Intent to Demolish forms) for the same purpose. The OIG interviewed key Building Safety, Engineering, & Environmental Department (BSEED) and Detroit Demolition Department (3D) staff to determine the policies and procedures related to the City's Residential Demolitions programs. In addition, the OIG reviewed numerous licenses, applications, certifications, permits, and RFQQ responses submitted by or belonging to the vendor.

The OIG did not find evidence of fraud, waste, abuse, or corruption in this matter. The OIG's review of the evidence received shows that the vendor's current owners obtained a City of Detroit Wrecking License and Residential Builder's Registration using their own names and qualifications, and that all necessary licenses and registrations are current. Although the OIG did find that from 2021 to 2022 members of the vendor's team had electronically signed it former owner's name to numerous Intent to Demolish forms, the OIG also found that the vendor's current owners were qualified to sign the forms themselves and that all recent (i.e., January 2023 – present) Intent to Demolish forms have been signed by a current owner. In addition, evidence shows that both before and after the entity changed hands members of the vendor's leadership team made reasonable efforts to add their own name(s) the Michigan Department of Environment, Great Lakes and Energy (EGLE) online database that generates the Intent to Demolish forms and to update relevant City departments appropriately. Finally, while the OIG's review of evidence revealed that internal 3D processes may cause some contractors to be unaware of the City's newer Residential Builder's Registration requirement, 3D's Director has already indicated that contractors will be reminded of the requirement at their next mandatory

contractor meeting. Therefore, the OIG determined no further investigation is needed in this matter.

### **23-0009-INV**

On April 6, 2023, the OIG received a complaint from the owner of a Detroit-based demolition contractor. The complainant alleged the following:

1. An Office of Contracting and Procurement (OCP) employee abused his authority by improperly approving demolition contractors for participation in the City of Detroit's Proposition N (Prop) Demolition Program despite knowing the contractors did not have employees. The complainant asserted that this was a violation of the City's Wrecking Ordinance, which prohibits the use of independent contractors to perform demolitions.
2. OCP did not correct the fraudulent actions of the employee, who allowed select contractors to use independent contractors to increase their crew capacity. As a result, the employee abused his authority by steering bids to select contractors.

Based on the investigation conducted by the OIG, we made the following findings and recommendations:

- The employee abused his authority by neglecting to notify all contractors that OCP would accept alternatives to verify crew capacity such as employment agreements for planned hires.
  - The OIG is aware the employee has already been disciplined for his actions but recommends that OCP consider if the discipline was appropriate based on all available information.
- The employee did not abuse his authority by allowing contractors to submit alternatives to the certified payroll requirement to verify crew capacity. Though his actions were improper, there is no evidence that the employee knew that allowing independent contractors to count towards crew capacity was a violation of the Wrecking Ordinance, as he received the approval from the then Chief Procurement Officer (CPO) to accept alternatives to certified payroll. Additionally, there is no evidence that the former CPO was aware that allowing alternatives to certified payroll, specifically the use of independent contractors, was a violation of the Wrecking Ordinance.
  - The OIG recommends that all changes to the requirements listed in RFQs, RFPs, and procurement contracts be reviewed by the relevant department(s) and/ or the Law Department to determine if the changes may have an impact on the performance of the contract and/ or may be contrary to the law.
- The OIG did not find that the employee abused his authority by purposefully steering bids to select contractors. Though the employee's actions resulted in unqualified contractors being awarded Prop N contracts, he mistakenly believed that such actions were allowed.

- The OIG did not find that OCP failed to correct the employee’s improper actions at the time the matter was brought to OCP’s current CPO. The CPO required OCP to conduct audits once she became aware of the issue and, as this report details, the CPO has implemented several changes related to the Prop N demolition procurement process. Additionally, the CPO cancelled the vendors preliminary awards in October 2022 though she did not receive confirmation that the vendor was demolishing properties in violation of the Wrecking Ordinance until November 2022.
  - Now that OCP is aware of the provision in the Wrecking Ordinance prohibiting the use of independent contractors in demolition, the OIG recommends that OCP review all existing demolition contracts to ensure that no contractor is operating in violation of this provision. If any such contractors are found, the OIG recommends that OCP take appropriate action.
  
- OCP indicated that they do not have the capacity for continuous monitoring of employment information and requested recommendations from the OIG about how to verify employment. Therefore, the OIG recommends that OCP consider the following to verify employment:
  - At the time of invoicing, require contractors to submit the names of the employees who worked on crews that completed the demolition work as well as sign an affidavit attesting that the work was completed by the identified employees. In addition, OCP should perform a random audit of the contractor’s certified payroll to verify the employee’s status.
    - On July 10, 2023, the OIG sent the draft report to the employee and OCP pursuant to Section 7.5-311 of the City of Detroit Charter and OIG Administrative Hearing Rules. After reviewing the draft report, and in response to the above recommendation, OCP stated that an “OCP Project Manager will work with Demo and CRIO to perform random audits.”
  - OCP should consider working with CRIO when they are verifying that a contractor is hiring the required number of Detroit residents when CRIO does work site checks.
    - After reviewing the OIG’s draft report, OCP stated that the “Civil Rights and Inclusion and Opportunity Department is now sharing employment information with OCP. OCP is using information from both Demo and CRIO to track the employees in the Smartsheet.”

## How OIG Audits Are Conducted and Resolved

The OIG's Forensic Auditors are specially trained to investigate programs, practices, and financial transactions to obtain evidence of fraud, abuse, waste, and corruption in City of Detroit government. The Forensic Auditors use this expertise to identify fraud risks, detect the misappropriation of City assets and make recommendations to prevent future incidents. In addition, OIG Forensic Auditors review various programs, policies, and procedures to determine whether they are sufficient to detect and prevent fraud, abuse, waste, and corruption. The OIG may initiate an audit based on information received in the complaint or based on an assessment of risk.

An audit generally involves performing one or more of the following:

- 1) A preliminary survey to gather background information and identify audit objectives.
- 2) A risk assessment to identify areas of concern.
- 3) Interviews department staff and leadership.
- 4) Review of requested documents.
- 5) Analytical procedures for detailed testing.

An OIG audit may result in findings that identify actual incidents, or actions that increase the risk of, waste, abuse, fraud, or corruption in the City's operations. If the audit reveals that criminal activity may be involved, pursuant to Section 7.5-308 of the 2012 Charter of the City of Detroit (the Charter), the Inspector General is required to "promptly refer the matter to the appropriate prosecuting authorities." An audit can also result in an OIG investigation.

A report is drafted at the end of each audit that includes any conditions that increase the risk of fraud, abuse, waste, and corruption as well as recommendations to mitigate the conditions identified during the audit. Pursuant to Section 7.5-311(1) of the Charter, "no report or recommendation that criticizes an official act shall be announced until every agency or person affected [by the report or recommendation] is allowed a reasonable opportunity to be heard at a hearing with the aid of counsel." Therefore, when our draft findings are critical, we send a copy of our draft findings, either as a draft memorandum or as a draft report to the affected parties. Thereafter, pursuant to the OIG's Administrative Hearing Rules (Hearing Rules), the parties have 14 calendar days to either provide a written response and/or seek an administrative hearing. Reports are not finalized until the Administrative Hearing process has concluded. For additional information on this process, or to see copies of our audit reports, please visit our website at [www.detroitmi.gov/inspectorgeneral](http://www.detroitmi.gov/inspectorgeneral).

*Note: The OIG did not have any open audits during the 3<sup>rd</sup> quarter of 2023.*

**RECOMMENDATIONS TO CITY DEPARTMENTS AND AGENCIES FROM THE OIG**

**Status Report as of September 30, 2023**

<b>Case Number</b>	<b>Public Servant, Department, Board or Agency</b>	<b>Recommendation</b>	<b>Status</b>	<b>Recommendation Date</b>	<b>Public Servant, Department, Board or Agency Response</b>
20-0001-INV	Retirement System	Develop policies to verify the pensioner's information and put benefits in escrow when a individual has been charged with fraud related to their benefits, work with attorneys to ensure changes apply with applicable laws.	Closed	9/21/2022	On March 23, 2023, Dave Cetlinski reported that the recommendations have been brought up to the trustees of the system previously and they have taken it under advisement. No additional information has been provided since March.
21-0016-INV	Detroit Police Department-Human Resources (HR)Division	Revise policies to mandate when HR must hold an appeal hearing and require HR to provide a timely notification the appeal was received. It was also recommended that DPD convene a hearing for the complainant in accordance with DPD Manual Directive 401.1-6.2.	Closed	3/11/2022	DPD agreed there should be clarification to relevant portions of the manual regarding a mandatory set time to hold a hearing. However, DPD disagreed with the OIG's recommendation to hold an appeal hearing due to the time that has passed (6 years) from when the performance evaluation was initially issued.
21-0018-INV	Detroit Fire Department	Training to all DFD employees on the Outside Employment Policy; disciplinary action for the employee that failed to adhere to the policy	Open	2/3/2022	The recommendations were reviewed and appropriate action will be taken. At this time, the OIG has not received any notice of any actions taken.

<b>Case Number</b>	<b>Public Servant, Department, Board or Agency</b>	<b>Recommendation</b>	<b>Status</b>	<b>Recommendation Date</b>	<b>Public Servant, Department, Board or Agency Response</b>
21-0001-AUD	Treasury	Revise policies to instruct non-personnel to send all checks received to ODFS, Report to the State organizations that did not maintain supporting documentation as required.	Open	3/31/2022	No response from the department. However, the OIG learned the City worked with a third-party vendor to obtain some of the funds held by the State of Michigan.
21-0002-AUD	Office of Contracting and Procurement	Require departments to submit invoices with detailed descriptions, training of department personnel, holding vendors accountable that provide goods or services without a contract, coordinate with the Law Department and Board of Ethics on purchases with the name/likeness of elected officials.	Closed	6/29/2022	OCP responded that their policies already cover unauthorized purchases, that the Law Department is consulted whenever necessary, and training is already provided to City employees. The OIG responded by reiterating our specific recommendations to prevent fraud, abuse, waste, and corruption.
22-0001-INV	Elections Department	Develop a tracking system for computers, develop policies for computer use, involve Department of Innovation and Technology with computer purchases.	Open	3/29/2022	No response from the department.



<b>Case Number</b>	<b>Public Servant, Department, Board or Agency</b>	<b>Recommendation</b>	<b>Status</b>	<b>Recommendation Date</b>	<b>Public Servant, Department, Board or Agency Response</b>
22-0003-INV	Civil Rights, Inclusion and Opportunity (CRIO)	Revise policies to add an analytical component to its document review process, review the Finance Ordinance to provide clarity to contractors on requirements, training to contractors on requirements, contractor compliance with all City requests.	Open	9/13/2022	As of July 10, 2023, the policy has not yet been completed.
22-0005-INV	Elections/City Clerk	Create a policy regarding prohibited political activities, City Clerk to train campaign volunteers that are employees on prohibited political activities.	Closed	6/24/2022	As of March 3, 2023, the Department of Elections issued an Administrative Directive #90 regarding the Standard of Conduct for Elections and City Clerk employees. The document cited applicable sections of the Charter and advised adherence would be strictly enforced and violations would result in disciplinary action.
22-0007-INV	Office of Contracting and Procurement	Revise the procurement policy to include verification of the commodity code selected, advertise all bids that will exceed \$10,000, and additional training to staff on how to handle supplier protests.	Open	12/13/2022	No Response from Department

Case Number	Public Servant, Department, Board or Agency	Recommendation	Status	Recommendation Date	Public Servant, Department, Board or Agency Response
22-0009-INV	Office of Contracting and Procurement	Training for all city employees involved in the procurement process; Update policies and procedures reflect procedures that are currently used by OCP but not in writing; Review the invoices submitted by the vendor for improper charges and take appropriate action.	Closed	8/17/2023	OCP will train department and contract liaisons annually. OCP will increase their training and supply job aids for their staff to ensure appropriate implementation of OCP's policies.
22-0011-INV	Office of Contracting and Procurement	OCP should adhere to established policies and procedures regarding non-standard purchases; Revise policies and procedures where necessary to ensure a fair and competitive procurement process; Train staff members from other departments involved in the procurement process.	Open	5/22/2023	No response from the department.

<b>Case Number</b>	<b>Public Servant, Department, Board or Agency</b>	<b>Recommendation</b>	<b>Status</b>	<b>Recommendation Date</b>	<b>Public Servant, Department, Board or Agency Response</b>
22-0013-INV& 23-0001-INV	Office of the Chief Financial Officer; Department of Public Works	OCFO should revise the City policies and procedures to clarify the requirement that hourly employees must enter their time each workday; DPW administration should require all employees who drive City vehicles to read and sign copies of the City's Vehicle Use policy.	Open	9/29/2023	No response from the department.
22-0018-INV	Construction & Demolition Department	Develop a data documentation policy and/or procedure that can better ensure dirt is properly tracked from source to site.	Open	9/27/2023	No response from the department.
23-0003-INV	Construction & Demolition Department	Revise the internal processes to ensure all vendors are aware of the residential builder requirements, including any changes.	Closed	7/24/2023	Construction & Demolition Department Director indicated the vendors would be reminded on the residential builder registration requirements at their next mandatory meeting.
23-0007-INV	Buildings, Safety Engineering and Environmental Department	Coordinate with the General Services Department to revise the list of vehicles assigned to that division to accurately reflect the license plate and vehicle numbers for tracking purposes.	Open	3/28/2023	No response from the department.

Case Number	Public Servant, Department, Board or Agency	Recommendation	Status	Recommendation Date	Public Servant, Department, Board or Agency Response
23-0009-INV	Office of Contracting and Procurement	Require contractors to submit the names of the employees who worked on crews that completed the demolition work as well as sign an affidavit attesting that the work was completed by the identified employees; Perform a random audit of the contractor's certified payroll to verify the employee's status; Work with CRIO when they are verifying that a contractor is hiring the required number of Detroit residents when CRIO does work site checks.	Closed	7/26/2023	OCP will work with Demo and CRIO to perform random audits. CRIO is now sharing employment information with OCP. OCP is using information from both Demo and CRIO to track the employees in the Smartsheet.

## Office of the Inspector General Organizational Structure: 3<sup>rd</sup> Quarter of 2023

Between July 1, 2023, and September 30, 2023, the City of Detroit Office of the Inspector General (OIG) consisted of the following individuals:

Ellen Ha, Esq., CIG, **Inspector General**  
Kamau Marable, CIG, **Deputy Inspector General**  
Jennifer Bentley, Esq., CIGI, **OIG Attorney**  
Tiye Greene, Esq., **Associate Attorney**  
Edyth D. Porter-Stanley, CIGA, CFE, **Forensic Auditor**  
Beverly L. Murray, CIGA, CFE, **Forensic Auditor**  
Kelechi Akinbosede, Esq., CIGI, **Investigator**  
April Page, CIGI, **Investigator**  
Kasha Graves, **Administrative Assistant**  
Kaniya Foster, **Administrative Assistant**  
Kendall Nelson, **OIG Intern**

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### OIG Contact Information

**Via Internet:** [www.detroitmi.gov/inspectorgeneral](http://www.detroitmi.gov/inspectorgeneral)

*(The website is on a secure server, which allows individuals to provide information on a secure electronic report form 24 hours a day, 7 days a week.)*

**Via Telephone Hotline:** 313-964-TIPS (8477)

**Via OIG Telephone Line:** 313-628-2517

**Via Mail:** City of Detroit Office of Inspector General  
615 Griswold, Suite 1230  
Detroit, Michigan 48226

**Via Email:** [oig@detoig.org](mailto:oig@detoig.org) or [Suggestions@detoig.org](mailto:Suggestions@detoig.org)

**You can also visit the OIG at the address above to file a complaint in person.**