



**Manual of
Policies and Procedures**

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MISSION

The Jefferson Parish Office of Inspector General (“JPOIG”) provides a full-time program of investigation, audit, inspections and performance review of parish government operations.¹ The purpose of these programs is to assist government in improving operations and deterring and identifying fraud, waste, abuse and illegal acts and to provide increased accountability of parish government, its departments, agencies, special districts and entities receiving funds through the parish.² The JPOIG achieves this mission through:

- Administrative and Criminal Investigations
- Audits of Parish programs and operations
- Reviews of Parish programs, operations and policies³

Based upon these activities, the JPOIG issues final reports of findings and recommendations to the Jefferson Parish Ethics and Compliance Commission.⁴

¹ JPCO §2-155.10(7).

² The proper operation of democratic government requires that elected officials and public employees be accountable for their actions, that governmental decisions are made in a transparent manner subject to complete ethical and operation review, that public office and employment serve the highest standards of honesty and competence, and that there be public confidence in the integrity of government. La.R.S. 33:9611.

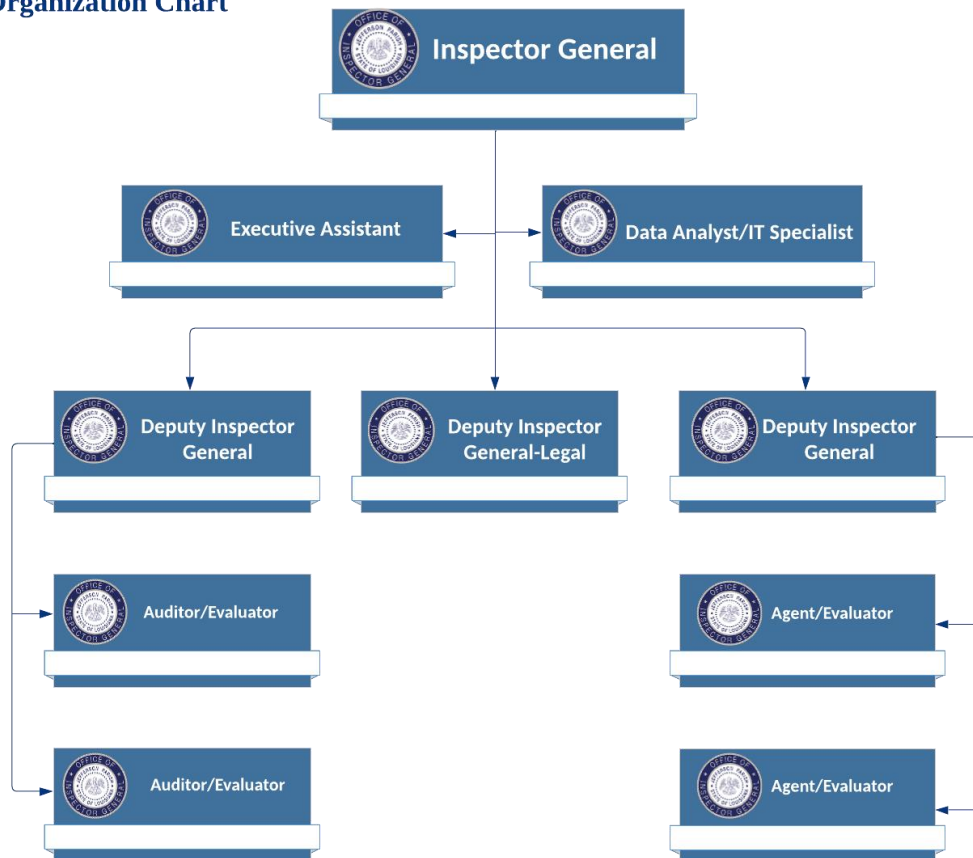
³ Standards for initiating and conducting audits, investigations, inspections and performance reviews by the office of inspector general will conform to the Principles and Standards establish by Association of Inspector General (“AIG Standards”). *See* JPCO §2-155.10(13). *See also* AIG Standards, Organizing.

⁴ JP Charter §4.10.



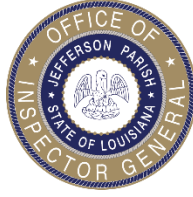
ORGANIZATIONAL CHART

JPOIG Organization Chart



The JPOIG is a department within Jefferson Parish government created by charter and is operationally independent from the legislative and executive branches of the parish. “Operationally independent” means that neither the parish council, parish president, nor any employee of the parish shall prevent or impair, or prohibit the Inspector General from initiating, carrying out, or completing any audit, investigation, inspection or performance review.⁵

⁵ See JP Charter §4-09 and JPCO §2-155.10(7)



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Chapter 1 – Organizational Principles and Legal Authority

Chapter 1 sets forth the policies and procedures attendant to the principles, purpose, authority, power and independence of the Jefferson Parish Office of Inspector General (JPOIG), as well as the fundamental policies and procedures relating to confidentiality of records, whistleblower and future policy development. The foundation for these policies and procedures lies within the Jefferson Parish Charter, the Jefferson Parish Code of Ordinances and Louisiana state law. These policies and procedures incorporate the Association of Inspectors General's national standards and, where appropriate, best practices as demonstrated by other local, state and federal offices of inspectors general.



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Chapter 1 – Organizational Principles and Legal Authority Section: 1-1 Statement of Principles

AIG STANDARDS: AIG Statement of Principles

IIA STANDARDS: N/A

PARISH ORDINANCE: JP Charter §4.09; JPCO §2-155.10

STATE LAW: La.R.S. 33:9611 *et seq*

I. INTRODUCTION

Accountability is the key to maintaining the public's trust. Inspectors general are entrusted with fostering and promoting accountability and integrity in government. In order to earn and maintain the public's trust, the JPOIG will adhere to the basic principles of integrity, objectivity, independence, professionalism, competence, courage, trust, honesty, fairness, forthrightness, public accountability and respect for others as more fully defined and set forth in this policy.⁶

II. PURPOSE

The purpose of this section is to recognize by policy the basic principles by which the JPOIG meets its mission and to provide for related procedures. This section is not intended to be definitive, but the principles set forth shall serve as the framework underlying all actions, decisions and reports of the JPOIG.

III. SCOPE

This section applies to all the JPOIG staff.

IV. POLICY

These principles shall guide and govern the JPOIG and its staff in the conduct of work and work-related decisions:

- ◆ **Integrity and Honesty** Being truthful and forthright in all JPOIG engagements, in both actions and communications, verbal as well as written.
- ◆ **Objectivity** Avoiding conflicts of interest and bringing attention to any situation that may cause, or appear to cause, a conflict of interest.
- ◆ **Independence** Protecting the integrity of the JPOIG by maintaining confidentiality of information and sources of information as required by law.
- ◆ **Confidentiality** Guarding and protecting JPOIG information, regardless of the format or manner in which it was gathered, from improper release, disclosure or dissemination.

⁶ See AIG Standards, Statement of Principles for Offices of Inspector General. See also JPCO §2.155.10(13), Professional standards. Standards for initiating and conducting audits, investigations, inspections, and performance reviews by the office of inspector general will conform to the Principles and Standards of Offices of Inspectors General (Green Book) promulgated by the Association of Inspectors General.

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- ◆ **Professionalism** Maintaining the highest degree of decorum, internally and externally.
- ◆ **Competence** Developing and maintaining a high level of proficiency and excellence with respect to the JPOIG duties and responsibilities.
- ◆ **Courage** Willingness and commitment to speak up and to inquire, to challenge assumptions notwithstanding opposition.
- ◆ **Trust** Acting in a reliable and dependable manner
- ◆ **Fairness and Respect for others** Treating others with respect and decency.
- ◆ **Forthrightness** Being focused, efficient and straightforward in action and communications while performing duties for and meeting responsibilities to the JPOIG.
- ◆ **Public Accountability** Completing all assigned tasks and performing those duties necessary to comply with policies, procedures and appropriate professional standards.

V. PROCEDURE

- A. The JPOIG will, as an organization, assess all actions, decisions and reports against these principles to ensure that the JPOIG's actions, decisions and reports reflect these principles and meet the professional standards of the Association of Inspectors General.
- B. The JPOIG will adopt a separate policy, "Professional Standards of Conduct," for the JPOIG staff that will incorporate these principles and serve to guide and govern the JPOIG staff in fulfilling their duties and responsibilities to the JPOIG.

APPROVED BY:



Kim Raines Chatelain
Inspector General

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Chapter 1 – Organizational Principles and Legal Authority Section: 1-2 Authority of the Office of Inspector General

AIG STANDARDS: AIG Basis of Legal Authority, Subparagraph B

IIA STANDARDS: N/A

PARISH ORDINANCE: JP Charter §4.09; JPCO §2-155.10(11)

STATE LAW: La.R.S. 33:9611 *et seq*

I. INTRODUCTION

An OIG should be established by law that defines the office's mandate, authority and powers. The law should authorize the OIG to conduct specific functions. The JPOIG is authorized under parish ordinance and state law to engage in specific functions.

II. PURPOSE

The purpose of this section is to recognize by policy the specific functions of the JPOIG that are authorized under parish ordinance and state law and to provide for related procedures.

III. SCOPE

This section applies to all the JPOIG staff.

IV. POLICY

A. Legal Authority – parish ordinance. The JPOIG is authorized by ordinance to engage in the following:

1. Audit, evaluate, investigate, and inspect the activities, records, and individuals with contracts, subcontracts, procurements, grants, agreements and other programmatic and financial arrangements undertaken by parish government and any other function, activity, process, or operation conducted by parish government.
2. Audit the efficiency and effectiveness of parish government operations and functions.
3. Review the reliability and validity of the information provided by parish government performance measures and standards.
4. Initiate investigations, audits, inspections, and performance review of parish government as the Inspector General deems appropriate.
5. Receive and investigate complaints from any source and investigate those complaints that the Inspector General deems credible, or upon his own initiative conduct investigations concerning alleged fraud, waste, abuse, illegal acts and service deficiencies including deficiencies in the operation and maintenance of facilities.

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6. Engage in prevention activities, including but not limited to the prevention of fraud, waste, abuse, and illegal acts; review of legislation; review of rules, regulations, policies, procedures, and transactions; and the supplying, providing and conducting of programs for training, education, certification and licensing.
7. Conduct joint investigations and projects with other oversight or law enforcement agencies, including but not limited to the district attorney, attorney general, and the United States attorney.
8. When efficiency problems are noted, the Inspector General has an affirmative duty to provide a standard of efficient practice to the unit in question, and to assess whether adequate resources are available for implementation of a program.
9. Issue reports and recommend remedial actions to be taken by the Parish Council, the Parish President, Parish departments or agency heads to overcome or correct operating or maintenance deficiencies and inefficiencies identified by the JPOIG
10. Monitor implementation of recommendations made by the JPOIG and other audit, investigative, and law enforcement agencies.
11. Establish policies and procedures to guide functions and processes conducted by the JPOIG.
12. Maintain information regarding the cost of investigations and cooperate with appropriate local, state, and federal administrative and prosecutorial agencies in recouping such costs from non-governmental entities involved in willful misconduct.
13. Require reports from the office of the parish president, parish council or parish departments, agencies, special districts, boards or commissions, regarding any matter within the jurisdiction of the JPOIG.
14. Upon discovering credible information of corruption, fraud, waste, abuse or illegal acts in carrying out the duties and responsibilities as inspector general, the Inspector General shall report to the district attorney, or the United States attorney, or other appropriate law enforcement agency.
15. Whenever the Inspector General has reasonable grounds to believe there has been a violation of federal or state law, the Inspector General shall refer a matter to the district attorney, the United States attorney or other appropriate law enforcement agency.
16. Upon detecting a potential violation of the state ethics law, the JPOIG shall notify the state ethics board pursuant to R.S. 42:1161.
17. Upon detecting a potential violation of a parish ethics ordinance, the JPOIG shall notify the Ethics and Compliance Commission.
18. The JPOIG shall be notified in writing prior to any meeting of a selection or negotiation committee relating to procurement of goods or services by the parish, including meetings involving third-party transactions. The notice required shall be given to the Inspector General as soon as possible after a meeting has been scheduled, but in no event later than twenty-four (24) hours prior to the scheduled meeting. The Inspector General may attend all parish meetings relating to the procurement of goods or services

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as provided, and the Inspector General may pose questions and raise concerns consistent with the functions, authority and powers of the Inspector General. An audio recorder or court stenographer may record all selection or negotiation committee meetings attended by the JPOIG.

19. The person in charge of any department, agency, board, commission, the parish president, the parish council, or any parish council member, may request the assistance of the JPOIG with respect to implementation of any suggested legislation or legislative policy. In such an event, the Inspector General may assign personnel to conduct, supervise or coordinate such activity.
20. The Inspector General may do all things necessary to carry out the functions and duties, including the promulgation of rules and regulations regarding the implementation of responsibilities, duties and powers of the office.⁷

B. Legal authority – other

The JPOIG recognizes that, in addition to local parish ordinance, operations may be affected by other laws, including federal and state law. Nothing contained in these policies and procedures is intended to contradict or supersede those laws and regulations.

V. PROCEDURE

- A. The JPOIG will adopt, as needed, policies and procedures to ensure that the JPOIG's authority is appropriately exercised in a manner compliant with professional standards of the Association of Inspectors General.
- B. The JPOIG staff will receive counseling and on-going instruction on the JPOIG's authority, as well as on JPOIG policies and procedures, to ensure that the JPOIG staffs' actions, decisions and reports are an appropriate exercise of the JPOIG authority.

APPROVED BY:



Kim Raines Chatelain
Inspector General

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⁷ JPCO §2-155.10(11)



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Chapter 1 – Organizational Principles and Legal Authority Section: 1-3 Powers of the Office of Inspector General

AIG STANDARDS: AIG Basis of Legal Authority, Subparagraph C

IIA STANDARDS: N/A

PARISH ORDINANCE: JP Charter § 4.09; JPCO §2-155.10(11)-(12) and JPCO §2-155.10(18)

STATE LAW: La.R.S. 33:9613 *et seq*

I. INTRODUCTION

An OIG should be established by law that defines the office’s mandate, authority and powers. The law should grant the OIG specific powers. The JPOIG is vested with certain powers under parish ordinance and state law.

II. PURPOSE

The purpose of this section is to recognize by policy the specific powers vested in the JPOIG under parish ordinance and state law, and to establish procedures for the exercise of these powers by the JPOIG.

III. SCOPE

This section applies to all the JPOIG staff.

IV. POLICY

A. Power – parish ordinance

1. The JPOIG shall have access to all records of the Parish or of any individual, partnership, corporation or organization involved with the Parish in any financial or official capacity.
2. The JPOIG shall have access to all employees of the Parish.
3. The JPOIG shall have access to any building or facility that is owned, operated or leased by the Parish.⁸
4. The JPOIG shall be considered a parish law enforcement agency but shall not be a police force and shall not bear firearms. The JPOIG is conferred with all investigative powers and privileges appurtenant to a law enforcement agency under state law.⁹
5. The JPOIG may issue or caused to be issued a subpoena.¹⁰
6. The JPOIG shall conduct preliminary inquiries, inquiries or investigations on behalf of the Ethics and Compliance Commission on all matters brought before it.¹¹

⁸ JP Charter §4-09(A); JPCO §2-155.10(3)

⁹ JPCO §2-155.10(7)

¹⁰ JPCO §2-155.10(18); La.R.S. 33:9613(A)

¹¹ JPCOO §2-155.10(7)(b).

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- C. Power – state law
1. The JPOIG is conferred with all investigative powers and privileges appurtenant to a law enforcement agency under state law.¹²
 2. The JPOIG may make investigations and examinations, within or outside of the state.¹³
 3. The JPOIG may compel the attendance of witnesses to be deposed under oath or the production of public or private records by issuing a subpoena upon approval of a judge of the 24th Judicial District Court, unless otherwise permitted to issue an administrative subpoena.
 4. The JPOIG may issue an administrative subpoena to require the production of books, records, documents or other evidence deemed relevant or material to an investigation or audit, or inspection from local governmental subdivision officer, employee, elected official, department, agency, board, commission, public benefit corporation, quasi-public agency or body, contractor, subcontractor, licensees, and every application for certification of eligibility for parish contract or program.¹⁴

VI. PROCEDURE

- A. The JPOIG will adopt, as needed, policies and procedures with which the JPOIG will comply to ensure that powers are appropriately exercised in a manner compliant with professional standards of the Association of Inspector Generals.
- B. The JPOIG staff will receive counseling and on-going instruction on the JPOIG's powers, as well as policies and procedures, to ensure that the JPOIG staffs' actions, decisions and reports align with the JPOIG's powers.

APPROVED BY:



Kim Raines Chatelain
Inspector General

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¹² La.R.S. 33:9612

¹³ La.R.S. 33:9613

¹⁴ La.R.S. 33:9613(A)(4)(a) and La.R.S. 33:9613(D)-(E).



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Chapter 1 – Organizational Principles and Legal Authority Section: 1-4 Confidentiality

AIG STANDARDS: AIG Basis of Legal Authority, Subparagraph D
IIA STANDARDS: 2330 Recording Information
PARISH ORDINANCE: JP Charter §4.09; JPCO §2-155.10
STATE LAW: La.R.S. 33:9614

I. INTRODUCTION

An OIG should be established by law that authorizes the OIG to maintain appropriate confidentiality of records and, to the extent practicable, of the identities of individuals who provide information to the OIG, unless it is necessary to make such records or identities public in the performance of duties. The law should impose penalties for breach of confidentiality.¹⁵ The JPOIG is authorized under parish ordinance and state law to maintain appropriate confidentiality of records, and to the extent practicable, of the identities of individuals who provide information to the JPOIG. Penalty for breach of confidentiality is provided under parish ordinance and state law.

II. PURPOSE

The purpose of this section is to recognize by policy the JPOIG's legal authority to maintain appropriate confidentiality of records as well as individuals who provide information, and to establish procedures to ensure compliance with the JPOIG's legal authorities in these matters.

III. SCOPE

This section applies to all the JPOIG staff.

IV. POLICY

A. Confidentiality of records – pending matters

Any material, records, data and information compiled by the JPOIG in an investigation, examination, audit, inspection, or performance review pursuant to state law is confidential and privileged and not subject to the Public Records Act until the investigation, examination, audit inspection, or performance review is complete. The investigation, examination, audit, inspection or performance review is not deemed complete if the JPOIG has submitted material, records, data and information from the results of such investigation, examination, audit, inspection or performance review to any other law enforcement or regulatory agency for further investigation or for criminal or civil prosecution, and if such investigation or prosecution has not been completed or become inactive.¹⁶

¹⁵ AIG Basis of Legal Authority, Subparagraph D

¹⁶ La.R.S. 33:9614: *See also* JPCO §2-155.10(8) providing that all records of the office of inspector general shall be exempt from public disclosure and shall be considered confidential, unless it is necessary for the inspector general to make such records public in the performance of his duties. Unauthorized disclosure of information by the inspector general or any employee of the office of inspector general is subject to review and disciplinary action by the appointing authority.

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B. Confidentiality – complainants

1. The Inspector General may receive and investigate complaints or information from any public employee concerning the possible existence of any activity constituting fraud, waste, abuse, and illegal acts. The Inspector General shall not, after receipt of a complaint or information from an employee, disclose the identity of the employee without written consent of said employee, unless the Inspector General determines such disclosure is necessary and unavoidable during the course of the investigation. In such event, the employee shall be notified in writing at least seven (7) days prior to such disclosure.¹⁷
2. The Inspector General may receive and investigate complaints or information from individuals, other than public employees, concerning the possible existence of any activity constituting fraud, waste, abuse, and illegal acts. The Inspector General will not, within the confines of the law, disclose the identity of the individual providing the information unless the individual has consented.

C. Privileged and confidential information

1. No privilege established by law shall be deemed waived on any record obtained by the JPOIG in connection with the performance of the JPOIG's duties. Any record that is confidential or privileged pursuant to any other provision of law shall remain confidential or privileged.
2. It shall be a misdemeanor punishable by a fine or not more than two thousand dollars or imprisonment for not more than one year, or both, for the JPOIG or any designated staff member or any other public official, corporation, or individual to make public any such information or record.¹⁸

D. Legal communications – Parish¹⁹

Providing the office of the Inspector General, an agency of parish government, with communications by and between any parish attorney and the Parish Council, parish president, or any parish officer, employee, department, agency, special district, board or commission shall not be deemed or construed as a waiver of any attorney-client privilege enjoyed by the parish, the Parish Council, the parish president, or any parish officer, employee, department, agency, special district, board or commission.²⁰

¹⁷ JPCO §2-15.10(21)

¹⁸ La.R.S. 33:9614; *See also* JPCO §2-155.10(20) providing the office of inspector general, an agency of parish government, with communications by and between any parish attorney and the parish council, parish president, or any parish officer, employee, department, agency, special district, board or commission, pursuant to the provisions of JPCO §2-155.10, shall not be deemed or construed as a waiver of any attorney-client privilege enjoyed by the parish, the parish council, the parish president, or any parish officer, employee, department, agency, special district, board or commission.

¹⁹ JPCO §2-155.10(14)

²⁰ JPCO §2-155.10(20)

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V. PROCEDURE

- A. The JPOIG will adopt, as needed, specific policies and procedures to ensure that the identify of public employees and individuals providing information about fraud, waste and abuse are kept confidential within the confines of the law.
- B. The JPOIG will adopt, as needed, specific policies and procedures to ensure that information, accessed or received by the JPOIG, that is privileged, confidential and/or otherwise protected by law is appropriately safeguarded.
- C. The JPOIG staff will receive counseling and training on the JPOIG's legal authority to access and receive information that is privileged, confidential and/or otherwise protected by law is appropriately safeguarded.
- D. The JPOIG staff will receive instruction and training on the JPOIG's obligation to safeguard information that is privileged, confidential and/or otherwise protected by law.

APPROVED BY:



Kim Raines Chatelain
Inspector General

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Chapter 1 – Organizational Principles and Legal Authority Section: 1-5 Inspector General and Staff Qualifications

AIG STANDARDS: AIG Basis of Legal Authority, Subparagraph E
IIA STANDARDS: 1200 Proficiency and Due Professional Care
PARISH ORDINANCE: JP Charter §4.09; JPCO §2-155.10(3)
STATE LAW: None

I. INTRODUCTION

An OIG should be established by law that sets forth the requirements for the position of inspector general and staff. The Inspector General should be selected without regard to political affiliation on the basis of integrity, capability for strong leadership, and demonstrated ability in accounting, auditing, financial analysis, law, management analysis, public administration, investigation, criminal justice administration or other appropriate fields. An OIG staff should collectively possess the variety of knowledge, skills, and experience needed to accomplish the OIG mission. The OIG should ensure that staff receive appropriate training and that OIG staff attain and maintain appropriate professional licensure and certification.

Qualifications for the Inspector General are established by Charter and by ordinance. Qualifications for JPOIG staff are established by the Inspector General.

II. PURPOSE

The purpose of this section is to recognize by policy and procedure the qualifications for the Inspector General established by charter and ordinance, and the means by which the Inspector General ensures that JPOIG staff collectively possess knowledge, skills and experience to accomplish the JPOIG mission.

III. SCOPE

This section applies to the Inspector General and JPOIG staff

IV. POLICY

A. Inspector General qualifications

1. The Inspector General shall be qualified by special training and experience in the administration and managing of programs for prevention, examination, investigation, audit, detection, elimination and prosecution of fraud, corruption, waste, mismanagement, or misconduct in the operation of government or organizations.²¹
2. The Inspector General is to be selected without regard to political affiliations and on the basis of integrity, capability for strong leadership, and demonstrated ability in accounting, auditing, financial analysis, law, management analysis, public administration, investigation, criminal justice administration or other closely related fields. In addition, the Inspector

²¹ JP Charter §4.09(B)

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General should possess demonstrated knowledge, skills, abilities and experience in conducting audits, investigations, inspections and performance reviews.

3. A qualified candidate for the Inspector General shall be a person who:
 - a. Has at least five (5) years experience in any one (1), or combination of the following fields: (1) as an inspector general; (2) as a federal law enforcement officer; (3) as a federal or state court judge; (4) as a licensed attorney with expertise in the areas of audit and investigation of fraud, mismanagement, waste, corruption and abuse of power; (5) as a senior-level auditor or comptroller; (6) supervisory experience in an office of an inspector general or an investigative public agency similar to an office of inspector general.
 - b. Has a four-year degree from an accredited institution of higher learning.
4. A highly qualified candidate, in addition to the minimal qualifications, shall be a person who:
 - a. Has managed and completed complex investigations involving allegations of fraud, waste, abuse, illegal acts, theft, public corruption, deception and conspiracy;
 - b. Has demonstrated the ability to work with local, state and federal law enforcement agencies and the judiciary; and/or
 - c. Has an advanced degree in law, accounting, public administration or other relevant field.
5. A former or current elected official or employee of parish government may not be appointed inspector general within five (5) years following the end of such individual's period of service. Notwithstanding the foregoing restriction, employees of the Office of Inspector General who have served in the office for four (4) or more years may be immediately eligible for appointment to the position of inspector general. The Inspector General shall hold at appointment professional certification as a certified inspector general (CIG). Two (2) or more other professional certifications such as certified inspector general investigator (CIGI), certified inspector general auditor (CIGA), certified public accountant (CPA), certified internal auditor (CIA), certified governmental financial manager (CGFM) and certified fraud examiner (CFE). A former or current elected official or employee of the state or its political subdivisions may not be appointed Inspector General within five (5) years following that individual's period of service. This shall not prohibit the reappointment of an inspector general currently holding the position of inspector general.
6. The Inspector General shall not hold, nor be a candidate for, any elective office while inspector general, and no officer or employee of the Office of the Inspector General shall hold, or be a candidate for, any elective office while an officer or employee. The Inspector General shall not hold office in any political party or political committee, nor shall he/she participate in any political campaign of any candidate for public office, nor make any

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campaign contribution or campaign endorsement during his/her service as inspector general.²² No officer or employee of the Office of the Inspector general shall hold office in any political party or political committee, or participate in any political campaign of any candidate for public office, or make any campaign contribution or campaign endorsement, while an officer or employee of the Office of Inspector General.²³

- B. Staff qualifications
 - 1. The staff collectively possesses the variety of knowledge, skills, and experience to accomplish the JPOIG mission.
 - 2. The staff receives appropriate training and maintains appropriate professional licensure and certification.

V. PROCEDURE

- A. The Ethics and Compliance Commission will appoint the Inspector General as provided by ordinance.²⁴
- B. The Inspector General will appoint the JPOIG staff, and the JPOIG staff will serve at the will of the Inspector General.
- C. The JPOIG will adopt, as needed, separate policies and procedures to ensure that staff possess a variety of knowledge, skills and experience to accomplish the mission of the JPOIG.
- D. The JPOIG will adopt, as needed, separate policies and procedures to ensure the JPOIG staff receives appropriate training and maintains appropriate professional licensure and certification.

APPROVED BY:



Kim Raines Chatelain
Inspector General

EFFECTIVE DATE : 05/18/2017

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²² JPCO §2-155.10(3)-(i)

²³ JPCO §2-155.10(4)

²⁴ JPCO §2-155.10(5)



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Chapter 1 – Organizational Principles and Legal Authority Section: 1-6 Independence

AIG STANDARDS: AIG Basis of Legal Authority, Subparagraph F

IIA STANDARDS: N/A

PARISH ORDINANCE: JP Charter § 4.09; JPCO §2-155.10(3)-(7)

STATE LAW: N/A

I. INTRODUCTION

An OIG should be established by law that sets forth provisions to create and maintain the independence of the inspector general and the office of inspector general. The law should address: (1) appointment and removal of the inspector general; (2) the term of appointment of the inspector general; (3) organizational placement of the office of inspector general; and (4) funding for the inspector general.

The appointment and removal of the Inspector General, term of office and organizational placement of the Office of Inspector General are established by Parish Charter and ordinance. Dedicated funding for the support and maintenance of the JPOIG is established by Parish Charter.

II. PURPOSE

The purpose of this section is to recognize and establish by policy and procedure the means by which the Inspector General and the JPOIG creates and maintains independence.

III. SCOPE

This section applies to the Inspector General and all JPOIG staff.

IV. POLICY

A. Inspector General appointment

1. The appointing authority for the Inspector General shall be the Ethics and Compliance Commission.
2. The Ethics and Compliance Commission shall convene within sixty (60) days of a vacancy in the position of inspector general to initiate a national search to fill the position.
3. The appointing authority shall conduct a nationwide search to fill the position of inspector general. The appointing authority will recommend the annual salary of the Inspector General and approve the annual salary each year thereafter.
4. In case of a vacancy in the position of inspector general, the chairperson of the appointing authority may appoint a first assistant inspector general, deputy inspector general, or other office of inspector general management personnel as interim inspector general until the appointing authority permanently fills the position. The appointing authority may by majority

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vote of all members overrule the chairperson's appointment and appoint an alternative candidate with majority approval.²⁵

- B. **Inspector General, term of office**
The Inspector General is appointed for a term of four (4) years, which term shall begin when the Inspector General begins employment with the Parish. One (1) subsequent four-year term may be renewed at the discretion of the appointing authority. An inspector general who has served more than one and one-half (1 ½) terms in two (2) consecutive terms shall not be eligible for reappointment as inspector general for the succeeding term.²⁶
- C. **Inspector General, removal**
Following a public hearing by the appointing authority, the Inspector General may be removed from office for cause by two-thirds (2/3) vote of the entire membership of the ethics and compliance commission, which must then publicly report the reasons for removal to the parish council. Causes for removal may include abuse of power or authority, conviction of a state or federal felony, or entry of a guilty or nolo contendere plea to a state or federal felony charge, discrimination, ethical misconduct in office, unprofessional conduct and other acts tarnishing the integrity of the JPOIG.²⁷
- D. **Organizational placement**
The JPOIG is a department within Jefferson Parish government created by charter and is operationally independent from the legislative and executive branches of the parish. “Operationally independent” means that neither the Parish Council, parish president, nor any employee of the parish shall prevent or impair, or prohibit the Inspector General from initiating, carrying out, or completing any audit, investigation, inspection or performance review.²⁸
- E. **Staffing and procurement**
The Inspector General shall have the power to establish personnel procedures and procurement procedures for the JPOIG. The Inspector General has the power to appoint, employ, contract and remove such assistants, employees, consultants and personnel including but not limited to legal counsel, as deemed necessary for the efficient and effective administration of JPOIG activities.²⁹

²⁵ JPCO §2-155.10(3)(a)-(d)

²⁶ JPCO §2-155.10(4). The ordinance was amended in 2018 via Ordinances 25962. It previously provided that the Inspector General is appointed for a term of five (5) years, which term shall begin when the inspector general begins employment with the parish. Subsequent four-year terms may be renewed at the discretion of the appointing authority.

²⁷ JP Charter §4-09(B); JPCO §2-155.10(5)

²⁸ JP Charter §4-09 and JPCO §2-155.10(7); *See also* JPCO §2-155.10(14) providing that the office of inspector general shall be located off site from the General Government Building and the Yenni Building, and shall have sufficient and necessary equipment, office supplies, and office furnishings to enable it to fulfill its functions and duties.

²⁹ JPCO §2-155.10(15)(a); *See also* JP Charter §4-03 (A)(7) and (B) excepting employees of the inspector general from Personnel Administration.

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- F. Funding
The JPOIG receives the proceeds of a special tax levied and approved by the voters of Jefferson Parish that is dedicated to providing, maintaining, administering and operating the JPOIG and Ethics and Compliance Commission.³⁰

V. PROCEDURE

- A. The Ethics and Compliance Commission will appoint the Inspector General, and the Inspector General will serve the term of appointment as provided by ordinance or as otherwise agreed upon between the Ethics and Compliance Commission and the Inspector General.³¹
- B. The JPOIG will operate in suitable office space in Jefferson Parish that is not within the General Government Building nor the Yenni Building.³²
- C. The JPOIG will, as needed, adopt separate policies and procedures for the recruitment, selection and retention of staff.
- D. The JPOIG will, as needed, adopt separate policies and procedures for procurement. In the absence of separate policies and procedures for procurement, the JPOIG will comply with the Parish procurement policies and procedures.
- E. The JPOIG will coordinate with the Ethics and Compliance Commission and prepare a joint budget plan for submission and inclusion in the annual parish budget.

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Kim Raines Chatelain
Inspector General

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³⁰ JP Charter § 4.09(D); *See also* JPCO §2-155.10(6) providing that the office of inspector general shall be funded by an annual appropriation by the parish council in an amount sufficient to cover its operations pursuant to Section 4.09(D) of the Jefferson Parish Charter. The inspector general shall prepare and transmit an annual operating budget to the chief operating officer, identifying in the budget all of the proposed expenditures.

³¹ JPCO §2-155.10(5)

³² JPCO §2-155.10(14).



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Chapter 1 – Organizational Principles and Legal Authority Section: 1-7 Whistleblower Protection

AIG STANDARDS: N/A
IIA STANDARDS: N/A
PARISH ORDINANCE: JPCO §2-155.10(21); Personnel Rule II-7
STATE LAW: N/A

I. INTRODUCTION

An OIG should be established by law which provides protections to complainants who, as a result of their complaints to the OIG, might be subject to retaliation by their employers.

II. PURPOSE

The purpose of this section is to identify the sources of protection from reprisal for reports received by the JPOIG, and procedure for compliance with local and state whistleblower laws.

III. SCOPE

This section applies to all JPOIG staff.

IV. POLICY

A. Confidentiality – complainants

The JPOIG may receive and investigate complaints or information from any public employee concerning the possible existence of any activity constituting fraud, waste, abuse and illegal acts. The JPOIG shall not, after receipt of a complaint or information from an employee, disclose the identity of the employee without written consent of said employee, unless the JPOIG determines such disclosure is necessary and unavoidable during the course of the investigation. In such event, the employee shall be notified in writing at least seven (7) days prior to such disclosure.³³

B. Protection from reprisal – parish ordinance

Any employee who has authority to take, direct others to take, recommend, or approve any personnel action shall not, with respect to such authority, take or threaten to take any such action against any employee as a reprisal for making a complaint or disclosing information to the JPOIG, unless the complaint was made or information disclosed with the knowledge that it was false or with willful disregard for its truth or falsity.³⁴

C. Protection from reprisal –parish employees of the classified service

Jefferson Parish Personnel Rules of the Classified Service, Ordinance No. 4074, as amended, provides Whistleblower Protection at Rule II, Section 7. Section 7

³³ JPCO §2-15.10(21)

³⁴ JPCO §2-155.10(21).

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provides that an appointing authority shall not engage in reprisal against an employee for disclosing a violation or suspected violation of (1) a state or federal law; (2) a lawful regulation or rule promulgated by Jefferson Parish or other political subdivision of the state of Louisiana; (3) a civil service rule or regulation adopted through the Jefferson Parish Personnel Board's rule-making process as provided in the Jefferson Parish Charter, Section 4.03. Section 7 also specifies the parameters or application of whistleblower protection, the recognized form of reprisal, right of appeal, burden of proof and penalty for knowingly making false disclosures. Rule II, Section 8, Exclusivity and Review, provides that the Jefferson Parish Personnel Board shall have the exclusive power and authority to hear and decide all removal and disciplinary cases and other actions appealable under Rules.

- D. Protection for reprisal – reporting violations of state ethics laws
Freedom from reprisal for disclosure of illegal acts: “If any public employee is suspended, demoted, dismissed, or threatened with such suspension, demotion, or dismissal as an act of reprisal for reporting an alleged act of impropriety in violation of this Section, such employee shall report such action to the board.” The State Board of Ethics shall then report any instances of wrongdoing by the agency in question to the State District Attorney's Office.³⁵

V. PROCEDURE

- A. Confidentiality
1. The identity of the employee who provides information to the JPOIG regarding the possible existence of any activity constituting fraud, waste, abuse or illegal acts will not be disclosed and will be safeguarded as confidential information.
 2. If JPOIG determines that disclosure of individual's identity is necessary and unavoidable during the course of the investigation, the employee will be notified in writing at least seven (7) days prior to such disclosure.
 3. The written notice and circumstances necessitating disclosure of employee's identify shall not be made without legal review.
- B. Complaints of reprisal – Parish ordinance
1. Complaints of reprisal for reporting matters to the JPOIG will be investigated by the JPOIG Investigations Division.
 2. The JPOIG will report on actions constituting reprisal when the complaint can be substantiated.
- C. Complaints of reprisal – state ethics laws
1. The JPOIG will refer to the Louisiana State Ethics Board any complaints of reprisal related to the reporting of violations of state ethics laws.
 2. The JPOIG will document matters referred to the Louisiana State Ethics Board in accordance with JPOIG policies and procedures.

³⁵ La. R.S. 42:1169.

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Chapter 1 – Organizational Principles and Legal Authority Section: 1-8 Development, Revision and Distribution of Policies

AIG STANDARDS: N/A
IIA STANDARDS: N/A
PARISH ORDINANCE: JPCO §2-155.10(11) and JPCO §2-155.10(15)(a)
STATE LAW: N/A

I. INTRODUCTION

The JPOIG is authorized to establish policies and procedures to guide the functions and processes conducted by the JPOIG.³⁶ The Inspector General has the power to establish personnel procedures and procurement procedures.

II. PURPOSE

The purpose of this section to establish a policy and procedures for the development, revision and maintenance of a written directive system that provides clear guidance to all JPOIG staff.

III. SCOPE

This section applies to all JPOIG staff.

IV. POLICY

A. Manual of Policies and Procedures:

1. The Inspector General establishes policies and procedures for the JPOIG through the Manual of Policies and Procedures.
2. Only the Inspector General has the authority to issue, revise or rescind a policy or procedure.
3. A policy or procedure established by the Inspector General is presumed to be in full force and effect until such time as it is revised or rescinded by the Inspector General
4. Each section of the JPOIG Manual of Policies and Procedures constitutes a written directive.
5. The Manual of Policies and Procedures is to provide all JPOIG employees guidance on the office's operating policies and procedures, organizational requirements, functions, authorities and carrying out of activities.

B. Format: Each section will be constructed in the following manner:

1. Header: The first page of each manual section will contain the following, in this order:
 - a. Seal: the JPOIG will be aligned to the left of the page.
 - b. Heading: The words "Manual of Policies and Procedures" will be centered at the top of the page. The heading will be in Times New Roman, 14 pt.

³⁶ JPCO §2-155.10(11)(l)

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- c. Manual Chapter: the chapter will appear immediately beneath the heading and to the right of the seal. Chapter titles should, when logical, align and follow those of the Association of Inspector General (AIG) Principles and Standards for Offices of Inspector General, except for those policies and procedures relating to human resources. It should be in Times New Roman, 14 pt.
- d. Manual Section and Subsection: The manual section and subsection will appear immediately below chapter headings. The sections and subsections should communicate the subject matter of the policy, and, where logical, follow sections within the Association of Inspector General (AIG) Principles and Standards for Offices of Inspector General, except for those policies and procedures relating to human resources. It should be in Times New Roman, 14 pt.
- e. A line will be drawn immediately below the section, or subsection when present.
- f. Standards: The legal authority, accrediting or authoritative body's standards and/or principles will be set forth in a table with citations. The source and/or professional associations will appear on the left in a column. The corresponding standards number and/or the appropriate section of the principles and standards will appear on the right in a column. The legal authority and accrediting or authoritative bodies to be included are:
 - i. Principles and Standards for Offices of the Inspector General promulgated by the Association of Inspectors General (AIG).
 - ii. Standards of Institute of Internal Auditors (IIA)
 - iii. Parish Ordinance, including citations to Parish Charter
 - iv. State statute.
 - v. If none of the above are applicable, it will be indicated by N/A (not applicable).
- g. Introduction: The introduction should provide a brief statement about the basis and need for the policy. The word "INTRODUCTION" will appear capitalized, and it will be numbered "I".
- h. Purpose: The purpose identifies the need or intended direction to be accomplished by the directive. The word "PURPOSE" will appear capitalized, and it will be numbered "II".
- i. Scope: The scope statement designates which JPOIG employees are affected by the written directive. The word "SCOPE" will appear capitalized, and it will be numbered "III".
- j. Policies: This section will identify the policy upon which the procedures are based. Policies may incorporate, reiterate or synthesize authority and standards identified in the table of standards appearing at the top of each policy. If applicable, the corresponding citations may be cited as footnotes to each directive.

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The word “POLICY” will appear capitalized and will be numbered “IV”.

- k. Procedures: This section sets out the procedures for policy implementation. Procedures will delineate the action required as “will,” “should,” “must” or “may” as appropriate. The word “PROCEDURE” will appear capitalized and numbered “V”.
 2. Text: The text will include as many pages as necessary to complete the policies and procedures. The text will be in Times New Roman, 12 pt. font, lower case.
 3. Outline Format: the following descending order of multilevel alphanumeric characters will differentiate and establish topic relationships.
 - I.
 - A.
 1.
 - a.
 - 1)
 4. Footer: Every page will contain a page number. The pages of the Manual of Policies and Procedures will be sequentially numbered. The footer may also contain footnotes. The footer will be in Times New Roman, 10 pt. font
 5. Authentication: The last page of each directive will contain authentication information containing the following information: (1) “APPROVED BY,” followed below by a signature line; (2) Printed name of the Inspector General; (3) “EFFECTIVE DATE,” with a line to the right; (4) “LAST REVIEWED,” with a line to the right; (5) “LAST UPDATED,” with a line to the right.
- C. Procedure for Numbering, Indexing or Searching:
1. The Manual of Policies and Procedures will be divided into a series of sequentially numbered chapters, containing one or more written sections with interrelated subject matters.
 2. A chapter number will identify each section with a section number following in sequential order. Example: 1-1 is Chapter 1, Section 1.
 3. The Table of Contents in the front of the Manual of Policies and Procedures will contain location of subject matter by chapter and section.
- D. Procedure for Proposing Changes:
1. Any JPOIG employee may propose a new policy and procedure or suggest revisions or deletions of existing manual sections. All proposals will be made in writing to the 1st Assistant Inspector General, who will present them to the Inspector General.
 2. Before considering a new policy, it shall be the responsibility of the 1st Assistant Inspector General to assess whether the proposed new policy is redundant to an existing policy and/or existing policies require or will require amending.

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3. Upon establishing the need for revising or adding a manual section, the 1st Assistant Inspector General, in conjunction with the appropriate JPOIG staff members, will draft the new manual section. The new section will adhere to the strict guidelines of the Written Directive System manual section. The new manual section must be specific, accurate, logical and written in a clear and concise manner.
- E. Procedure for Staff Review and Adoption:
1. The JPOIG 1st Assistant Inspector General, the affected Deputy Inspector General and the Inspector General will review all new, updated, revised or deleted manual section(s).
 2. Copies of the proposed or revised manual sections(s) will be forwarded to the above list along with a “Manual of JPOIG Policies and Procedures Review Transmittal Form” by the 1st Assistant Inspector General. The “Manual of JPOIG Policies and Procedures Review Transmittal Form” can be found in the Appendix and is incorporated herein by reference.
 3. Reviews will be completed and returned to the 1st Assistant Inspector General within the time period specified on the “Manual of Policies and Procedures Review Transmittal Form.”
 4. The above listed staff members are to provide their comments and recommendations on all new and proposed changes to the Manual of Policies and Procedures.
 5. Upon completion of individual staff reviews, the 1st Assistant Inspector General will incorporate the suggested changes into a draft manual section and submit it the Inspector General for approval and signature.
 6. Only the Inspector General has the authority to issue, revise or rescind a policy or procedure.
- F. Distribution:
1. A Manual of JPOIG Policies and Procedures will be issued to each staff member during the member’s JPOIG orientation.
 2. The 1st Assistant Inspector General will distribute new policies and procedures under the cover of a “Manual of Policies and Procedures Distribution Receipt Form.” Manual sections that have been revised will be distributed in the same manner.
 3. All JPOIG staff members will be provided a copy of the new, amended or revised manual sections and required to sign a “Manual of Policies and Procedures Distribution Receipt Form” acknowledging receipt and responsibility to review, understand and comply with the new sections. The staff member’s supervisor will collect the signed receipt and deliver it to the Inspector General Administrative Assistant for filing and retention in the staff member’s personnel record.
 4. All JPOIG staff members are charged with acquiring a sound working knowledge of all policies and procedures. If there is a question regarding a policy or procedure, the staff member is responsible for seeking clarification from the staff member’s supervisor.

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5. Instructions on how to incorporate new or amended material or information into the *Manual of Policies and Procedures* will be included with each distribution.
 - a. This will include the insertion or removal of an entire manual section. The revised manual section will have the Revised On date (month, day and year) printed at the bottom of every page.
 - b. Staff members will be required to make the necessary changes to their individual *Manual of Policies and Procedures*. All purged manual sections will be immediately destroyed.
 - c. A current *Manual of Policies and Procedures Distribution Receipt Forms* will be maintained by the 1st Assistant Inspector General.
6. Maintaining Records: The 1st Assistant Inspector General will maintain a complete and readily accessible file of current, revised and rescinded policies and procedures.
7. Procedure for Keeping Policies and Procedures Current:
 - a. The 1st Assistant Inspector General will periodically (every 1-2 years) review all JPOIG Policies and Procedures to determine the need for updates, revisions, amendments, or deletions as necessary to ensure their continued relevance and compliance. The review will be conducted in coordination with the Deputy Inspectors General and/or the Inspector General.
 - b. If it is determined that an update or revision is required, the changes will be made in accordance with subsection D (Procedure for Proposing Changes) and subsection F (Procedure for Staff Review and Adoption) of this Section. After the proposed changes have been reviewed by supervisory personnel and approved by the Inspector General, they will be distributed to all JPOIG staff members in accordance with subsection F (Distribution).
 - c. If no changes are required to the current JPOIG policies and procedures, a "Policies and Procedure Review Form" will be signed by the 1st Assistant Inspector General. The signed "Policies and Procedures Review Form," along with a copy of the current manual section, will be maintained by the 1st Assistant Inspector General to document review.

APPROVED BY:



Kim Raines Chatelain
Inspector General

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Chapter 2 – Quality Standards for Office of Inspector General

Chapter 2 identifies the quality standards established by the Association of Inspectors General (AIG) for Offices of Inspectors General (OIGs). The JPOIG adopts these quality standards. Public office carries with it a responsibility to apply public resources economically, efficiently, and effectively with the integrity necessary to maintain the public trust. The OIG has a unique mission in government related to public office responsibility and has a special need for high standards of professionalism and integrity. The sections in this chapter establish the policies and procedures necessary to ensure that AIG standards for quality are met, and a foundation to ensure the highest level of professionalism and integrity is set. These policies and procedures address independence, staff qualifications, planning, organizing and other matters related to the operation and conduct of the JPOIG.



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Chapter 2 – Quality Standards for Office of Inspector General Section: 2-1 Independence from Personal and External Impairments

AIG STANDARDS:	AIG Quality Standards for Office -- Independence
IIA STANDARDS:	1300 Quality Assurance and Improvement Program
PARISH ORDINANCE:	JPCO §2-155.10(3)-(7)
STATE LAW:	N/A

I. INTRODUCTION

The Inspector General and the staff must be free in fact and appearance from personal, external and organizational impairments to independence. The Inspector General and JPOIG staff have a responsibility to maintain independence, so that opinions, conclusions, judgments, and recommendations will be impartial and will be viewed as impartial by knowledgeable third parties.

The JPOIG will, through policy and procedure, establish and maintain independence so that opinions, conclusions, judgments, and recommendations will be impartial and viewed by others as impartial. The JPOIG will consider not only whether they are independent and whether their own attitudes and beliefs permit them to be independent, but also whether there is anything about their situation which might lead others to question their independence. All situations deserve consideration since it is important that the JPOIG be as independent as possible and impartial in fact and in appearance.³⁷

II. PURPOSE

The purpose of this section is to state the policy and establish the procedures for ensuring that personal, external or organizational impairments do not impugn JPOIG independence in fact or appearance.

III. SCOPE

This section applies to all JPOIG staff.

IV. POLICY

If circumstances result in an impairment, actual or perceived, to the independence of any JPOIG employee they shall immediately disclose the nature of the conflict. Whenever merited, the affected JPOIG employee(s) will be removed from the respective audit, investigation or evaluation. The impairments may be personal, external or internal.

³⁷ AIG Quality Standards for Offices of Inspector General, Independence Subparagraph B.

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A. Personal Impairments

Personal impairments may include, but are not limited to:³⁸

1. Self-interest
The threat that official, professional or financial relationships with any person or entity under investigation, audit, inspection or review, which may appear to affect the JPOIG staff member by changing, limiting or altering the scope of the outcome of work or otherwise inappropriately influence judgment or behavior;
2. Preconceived ideas or bias
The threat that preconceived ideas or biases towards activities, individuals, groups, organizations, objectives or particular programs could bias the outcome of the JPOIG work
3. Familiarity
The threat that aspects of a current or former relationship with management or personnel of government, or an entity subject to investigation, evaluation or audit will impact a JPOIG staff member's ability to make independent and objective judgments.
4. Previous involvement
Previous involvement, especially involvement in a decision-making or management capacity that could affect the work

B. External Impairments

The JPOIG must be insulated from external impairments that could restrict or interfere with its ability to form independent and objective opinions or conclusions. External impairments may include, but are not limited to:³⁹

1. Undue influence over staff -- External interference or undue influence in the selection, appointment and employment of JPOIG staff.
2. Undue influence or interference -- External interference or undue influence that impacts a JPOIG employee's ability to make independent and objective assessments and judgments.
3. Undue influence over tasks -- External interference or undue influence over the selection, scope, timing or the performance of an investigation, evaluation or over the content of any resulting report.
4. Undue influence over employment -- External interference or undue influence that jeopardizes the Inspector General or JPOIG staff's continued employment for reasons other than competency.
5. Interference with access -- Interference with JPOIG access to documents or individuals necessary to perform JPOIG work.
6. Funding and procurement -- Restrictions on funding or other resources dedicated to the JPOIG. Control over or interference with JPOIG funding, budget or procurement.
7. Political pressure -- Improper political pressure intended to influence the selection of or the performance of an investigation, evaluation or audit or the reporting of the findings.

³⁸ AIG Quality Standards for Offices of Inspector General, Independence Subparagraph C.

³⁹ AIG Quality Standards for Inspector General, Independence Subparagraph D.

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C. Organizational Impairments

The JPCO §2-155.10(7) provides that the office of inspector general shall be operationally independent from the legislative and executive branches of the parish, including the parish council, and the office of the parish president, but is authorized and encouraged to work cooperatively with the ethics and compliance commission.

1. Operationally independent means that neither the parish council, the parish president, nor any employee of the parish shall prevent, impair nor prohibit the Inspector General from initiating, carrying out or completing any audit, investigation, inspection or performance review.
2. Any actual or perceived threat to independence attributable to the placement of the JPOIG within government structure should be disclosed in any JPOIG reports, findings or recommendations.

V. PROCEDURE

- A. The Inspector General and the JPOIG staff are to avoid situations that could lead reasonable third parties with knowledge of the relevant facts and circumstances to conclude that the JPOIG is not able to maintain independence.
- B. The Inspector General and the JPOIG staff are to act with integrity and exercise objectivity and professional skepticism and avoid circumstances that would cause reasonable and informed third parties to believe that staff is not capable of exercising objective and impartial judgment or that the JPOIG's work has been compromised.
- C. The Inspector General and the JPOIG staff are to consider both personal, external and organizational impairments. If such impairments affect the JPOIG, whether individually or organizationally, the JPOIG should decline to perform the work and report the circumstances to the appropriate official. If the JPOIG cannot decline to perform the work, the impairment should be disclosed in any resulting report, along with any potential impact the impairment might have on the report's conclusions.⁴⁰
- D. The Inspector General and the JPOIG staff, as individuals and in the aggregate, are to evaluate any impairment as a potential threat to independence because impairments can have a cumulative effect on the JPOIG's independence. In situations where impairments exceed an acceptable level, the Inspector General and JPOIG staff should document the impairment and look for safeguards to eliminate it or reduce it to an acceptable level.
- E. In order to best ensure independence, the JPOIG staff will follow these steps to assess threats to independence:
 1. Identify any impairment that threatens independence;

⁴⁰ AIG, Quality Standards for Offices of Inspector General, Independence, Subparagraph B.

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2. Evaluate the significance of the impairment identified, both individually and in the aggregate; and
 3. Apply safeguards such as staff re-assignment, disclosure, and a documented statement from the Inspector General that a work product or project was declined, with reasons therefore stated. These safeguards will be applied as necessary to eliminate the impairments that threaten independence or reduce risk to an acceptable level. *See* Section G Reporting Requirements.
- F. Annual Attestation Requirement
1. By May 15th of each year, every JPOIG staff member will be required to sign an *Independence from Impairments Attestation Form* as a confirmation of their independence from personal, external or organizational impairments.
 2. The original signed “Independence from Impairments Attestation Form” will be maintained in each employee’s JPOIG personnel file. A copy will be provided to each employee.
 3. New JPOIG employees will be required to sign an “Independence from Impairments Attestation Form” during their initial orientation.
 4. The “Independence from Impairments Attestation Form” can be found in the Appendix and is incorporated herein by reference.
- G. Intakes, Investigations and Assigned Matters Attestation
- The Inspector General and the JPOIG staff will attest to personal independence from impairments on each individual intake, investigation and assigned matter through the JPOIG Case Management System or other such documentation as may be prescribed.
- H. Reporting requirements when an impairment is identified
1. When an impairment is identified, the affected staff member will disclose the actual or potential impairment to the staff member’s supervisor. The affected staff member will complete and sign an “Impairment Notification Form” detailing the impairment.
 2. The supervisor will receive and acknowledge receipt of the completed “Impairment Notification Form,” and submit the form to the 1st Assistant Inspector General.
 3. After review, the completed “Impairment Notification Form,” along with any specific recommendations or action items to the Inspector General for action.
 4. If the Inspector General determines that there exists an actual or potential impairment that may affect the performance or the outcome of the work, then the Inspector General will reassign the work and remove the affected employee from such assignment. The investigation, audit, inspection or review will continue without the participation of the affected employee.
 5. The original signed “Impairment Notification Form” will be maintained in the employee’s personnel file. A copy of the completed and signed form

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will be part of the permanent case file. A copy will be provided to the employee.

6. Failure to disclose an actual or potential conflict of interest may subject the JPOIG staff member to disciplinary action up to and including termination.
7. Consistent with the procedures established herein, Deputy Inspector Generals, to include 1st Assistant Inspector General, will report impairments to Deputy Inspector General - Legal, who will then report the impairment through the organizational hierarchy as previously described.
8. The Deputy Inspector General - Legal will report any impairment to the Inspector General.
9. Should the Inspector General have an impairment, the Inspector General will notify the Chair of the Ethics and Compliance Committee and the 1st Assistant Inspector General. When an impairment is identified, the Inspector General will complete and sign an “Impairment Notification Form” detailing the impairment. The Inspector General will give the completed “Impairment Notification Form” to those notified, who will acknowledge receipt. Those notified will jointly decide a course of action, including whether to continue with said action with or without the participation of the Inspector General. Those notified may decide whether to refer the action to another agency.

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Kim Raines Chatelain
Inspector General

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Chapter 2 – Quality Standards for Office of Inspector General Section: 2-2 Planning

AIG STANDARDS: AIG Quality Standards for Office -- Planning
IIA STANDARDS: 2100 Nature of the Work
PARISH ORDINANCE: JPCO §2-155.10(17)
STATE LAW: N/A

I. INTRODUCTION

An OIG should maintain a planning system for assessing the nature, scope, trends, vulnerabilities, special problems and inherent risks of programs and operations for use in establishing goals, objectives and tasks to be accomplished by the OIG within a specific time period.⁴¹

An OIG is responsible for ensuring that the resources available are used efficiently and effectively. Execution of this responsibility requires a planning process designed to maximize the impact of an OIG in detecting and preventing fraud, waste and abuse and in encouraging economy, efficiency, and effectiveness, with the commitment of resources needed to accomplish each OIG task.

II. PURPOSE

The purpose of this section is to state the policy and establish the procedures for ensuring that available JPOIG resources are used as efficiently and effectively as possible through planning and execution of investigations, audits and reviews.

III. SCOPE

This section applies to all JPOIG staff.

IV. POLICY

A. Annual performance planning

The JPOIG will annually engage in a purposeful process to identify specific programs, agencies and departments within the Parish to audit, investigate, inspect or evaluate. Such plan shall translate these priorities into outcome-driven goals, objectives and performance measures.

B. Elements of Planning

The elements of planning include, but are not limited to, the assessment of areas within the JPOIG jurisdiction and resource availability; the Parish's relative risk across program areas and functions; and the program or function's relationship to the Parish's core services.

1. Assessing JPOIG scope and resource availability includes:
 - a. programs and entities subject to JPOIG jurisdiction.

⁴¹ AIG Quality Standards for Offices of Inspector General, Planning.

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- b. effective use of JPOIG resources, including previous JPOIG work, joint efforts between differing JPOIG functions, input from JPOIG staff; and
 - c. plans of other organizations, both internal and external to Parish government;
 2. Assessing the Parish's relative risk across various program areas and functions to include, but not limited to, consideration of the following:
 - a. nature and type, as well as relationship with government and whether it is internal or external;
 - b. scope and subject matters covered or affected;
 - c. dollar magnitude, fiscal impact;
 - d. staffing, human capital expended;
 - e. budgetary trends, resource allocation;
 - f. perceived vulnerabilities; and
 - g. inherent risks.
 3. Assessing a program or function's relationship to the Parish's core services may include consideration of:
 - a. known or probable vulnerabilities to fraud, waste, abuse and mismanagement;
 - b. level and type of resources allocated;
 - c. type and level of funding provided;
 - d. potential benefits likely to result from JPOIG review, such as better internal controls; improved economy, efficiency, and effectiveness; detection and prevention of fraud, waste, abuse and mismanagement; and cost recovery;
 - e. probable cost effectiveness of each selection (JPOIG resources that would be expended compared to anticipated benefits);
 - f. impacts of alternative JPOIG review approaches, i.e. identifying systemic problems as opposed to concentrating on individual manifestations of these systemic problems.

C. Prevention

The JPOIG planning will incorporate a consideration of prevention strategies to include:

1. A procedure for JPOIG staff to identify and report prevention opportunities as these may come up in their work;
2. Awareness and training initiatives designed to inform the public and governmental personnel about the JPOIG's mission and how to report concerns;
3. Engaging public employees through direct training on recognizing and addressing fraud, waste and abuse in their programs and operations;
4. Ensuring the opportunity to assist in initial development of programs and operations;
5. Analyses of audit, investigation, and other JPOIG reports to identify trends and patterns;
6. Tracking the acceptance and implementation of recommendations.

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V. PROCEDURE

- A. The JPOIG staff performing investigations will establish an annual planning process that clearly addresses those elements noted above as well as others deemed appropriate. The supervising Deputy Inspector General will ensure the results shall be submitted in written form to the Inspector General no later than August 1 of each calendar year.⁴²
- B. The JPOIG staff performing audits will establish an annual planning process that clearly addresses those elements noted above as well as others deemed appropriate. The resulting Annual Work Plan is a public document that shall be submitted in written form to the Inspector General no later than August 1 of each calendar year.⁴³
- C. The JPOIG staff performing evaluations will establish an annual planning process that clearly addresses those elements noted above as well as others deemed appropriate. The supervising Deputy Inspector General will ensure the results shall be submitted in written form to the Inspector General no later than August 1 of each calendar year.⁴⁴
- D. JPOIG prevention strategies include but may not be limited to the following:
1. Raising public awareness of the JPOIG mission through public speaking engagements;
 2. Raising Parish employee awareness of the JPOIG through training, education and increased visibility by coordinating with Parish administration, including the Department of General Services, Public Information Office and Department of Human Resources; and
 3. Annual assessment of investigation, evaluation and audit reports for trends and patterns against recommendations and remedial action where feasible.

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⁴² See Section 3 – Quality Standards for Investigations for policies and procedures. See also JPCO §2-155.10(17).

⁴³ See Section 4 – Quality Standards for Audit for policies and procedures.

⁴⁴ See Section 4 – Quality Standards for Audit for policies and procedures.



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Chapter 2 – Quality Standards for Office of Inspector General Section: 2-3 Organizing

AIG STANDARDS:	AIG Quality Standards for Office -- Organizing
IIA STANDARDS:	N/A
PARISH ORDINANCE:	JPCO §2-155.10(15)(b)
STATE LAW:	N/A

I. INTRODUCTION

The Inspector General is responsible for organizing an OIG to assure efficient and effective deployment of resources. An OIG may emphasize such areas as fraud control, investigations, vulnerability assessments, internal controls, inspections, operational surveys, or computer security.⁴⁵

II. PURPOSE

The purpose of this section is to set forth the organizational principles upon which the JPOIG operates.

III. SCOPE

This section applies to all JPOIG staff.

IV. POLICY

- A. Organizational structure. The JPOIG is structured to foster coordinated, balanced and integrated accomplishment of the JPOIG's mission, goals and objectives.⁴⁶
1. The JPOIG may be divided into functional areas which are supervised by a Deputy Inspector General, but assignments will be based upon available resources and staffs' skills or areas of expertise.
 2. Staff possessing audit skills will audit Parish internal controls to ensure fiscal accountability and reduce the risk of fraud, waste or abuse. Staff may also engage in forensic reviews as required.
 3. Staff possessing investigative skills will initiate, conduct, supervise and coordinate investigative activity in both the administrative and criminal environment.
 4. Staff possessing evaluation skills will inspect, evaluate and review Parish functions and operations for efficiency and effectiveness.
 5. Legal will review all activities for efficacy and compliance.
 6. Staff assigned to audits, investigations and evaluations will lead, plan and manage projects as assigned by the Inspector General that further the JPOIG's mission, goals and objectives. These will be completed in coordination with Legal.
 7. One named Deputy Inspector General will serve as 1st Assistant Inspector General and acting Inspector General when necessary.

⁴⁵ AIG Quality Standards for OIG, Organizing, Subparagraph B.

⁴⁶ AIG Quality Standards for OIG, Organizing, Subparagraphs A and C-2.

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8. Other positions may be added to advance administrative and operational efficiency.
- B. Modifying organizational structure
1. This policy is not intended to preclude the additional functional areas.
 2. Additional positions may be created to support the JPOIG's mission, and at the discretion of the Inspector General, the new positions will be assigned to a specific functional area or otherwise identified within the organizational structure to establish a line of supervision and oversight.
- C. Duties and Responsibilities. Clearly assigned duties and responsibilities within the organization will be sufficiently flexible to ensure optimal productivity within the context of available resources.⁴⁷
1. Supervising Deputy Inspector General is responsible for the daily supervision of audit activity, the development of short and long-term objectives, including but not limited to the JPOIG Annual Work Plan, and actively participates in projects as appropriate.
 2. Supervising Deputy Inspector General is responsible for initiating, conducting, supervising and coordinating JPOIG investigative activity in both the administrative and criminal environment.
 3. Supervising Deputy Inspectors General is responsible for the daily supervision of evaluation activity, the development of short and long term objectives for evaluations and actively participate in projects as appropriate.
 4. Deputy Inspector General serving as general counsel is responsible for ensuring the legal efficacy of work performed.
 5. In the absence of the Inspector General, the Deputy Inspector General named 1st Assistant Inspector General serves as acting Inspector General.
- D. Recruiting, staffing and training
Recruiting, staffing and training will be conducted in a manner that supports the JPOIG's mission and organizational structure.⁴⁸
- V. PROCEDURE
- A. Organizational structure
1. The Deputy Inspectors General and any named 1st Assistant Inspector General each fall under the direct supervision of the Inspector General.
 2. Audits activity shall be supervised by a Deputy Inspector General.
 3. The Deputy Inspector General shall assign audits to one or more staff members who may be full-time, part-time, temporary or as-needed staff of the JPOIG.
 4. Investigative activity shall be supervised by a Deputy Inspector General.

⁴⁷ AIG Quality Standards for OIG, Organizing, Subparagraph C-1.

⁴⁸ AIG Quality Standards for OIG, Organizing, Subparagraph C-3.

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5. The Deputy Inspector General shall assign investigations to one or more staff who may be full-time, part-time, temporary or as-needed staff of the JPOIG.
 6. Evaluation activity shall be supervised by a Deputy Inspector General.
 7. The Deputy Inspector General shall assign evaluations to one or more staff who may be full-time, part-time, temporary or as-needed staff of the JPOIG.
- B. Modifying organizational structure
1. This policy is to be amended to reflect substantial or significant changes to the organizational structure, such as the addition of a functional area.
 2. This policy may, at the discretion of the Inspector General, be amended to reflect other or new positions. Otherwise, the position will be reflected by adoption and inclusion of a position description. *See Appendix.*
- C. 1st Assistant Inspector General Essential Duties and Responsibilities
1. Duties and responsibilities of the JPOIG 1st Assistant Inspector General are to be set forth in position descriptions. *See Appendix.* Position descriptions may be modified from time to time to comply with the policies and procedures established herein.
 2. Serve as Inspector General *ad hoc* in the absence of the Inspector General.
- D. Audit Essential Duties and Responsibilities
1. Duties and responsibilities of the JPOIG staff engaging in audit activity are to be set forth in respective position descriptions. *See Appendix* Position descriptions may be modified from time to time to comply with the policies and procedures.
 2. Supervising Deputy Inspector General (Audit)
 - a. Supervises and manages JPOIG staff performing audits.
 - b. Prepares JPOIG Annual Work Plan.
 - c. Plans, supervises, conducts and participates in audits and reviews.
 - d. Ensures that all work is conducted in accordance with prevailing professional standards.
 - e. Plans, attends and participates in meetings with local, state and federal enforcement and oversight authorities.
 - f. Plans and conducts training for Auditors and support staff.
 - g. Supervises and evaluates the intake of complaints and assigns matters for audit.
 - h. Maintains a current working knowledge of Jefferson Parish structure, programs and administrative policies.
 - i. Maintains a current working knowledge of Jefferson Parish Civil Service Personnel Rules and operational policies/procedures.
 3. Staff performing audits
 - a. Plans and prepares performance and financial audits (financial and compliance, efficiency and economy, program results and comprehensive audits) under a wide variety circumstance.

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- b. Engages in stand-alone efforts or works in conjunction with, or support of, investigative or evaluation efforts by prosecutorial or other partner local, state and federal law entities.
 - c. Collects, compiles, organizes, analyzes and preserves data pertaining to announced and unannounced audits. Typical material reviewed may include bank records, invoices, receipts, corporate filings, financial statements, business certifications, responses to public procurement solicitations, contracts, change orders, etc.
 - d. Prepares comprehensive and complex reports addressing multiple issues and systems that clearly state scope, actions taken, findings and recommendations.
 - e. Interprets and communicates findings.
 - f. Develops and analyzes data through relevant computer software.
 - g. Interviews individuals as needed during the course of JPOIG audits.
 - h. Recommends the issuance of subpoenas when needed.
 - i. Prepares and compiles interim progress reports detailing time utilized and projections of time required.
 - j. Recommends changes in policies, procedures and strategies internally and externally when appropriate.
 - k. Completes routine administrative duties, including appropriate documentation of audit activities.
 - l. Attends and participates in all required training sessions.
 - m. Other related duties as necessary.
- E. Investigations Essential Duties and Responsibilities
- 1. Duties and responsibilities of JPOIG staff engaging in investigative activity are to be set forth in respective position descriptions. *See* Appendix. Position descriptions may be modified from time to time to comply with the policies and procedures established herein
 - 2. Deputy Inspector General (Investigations)
 - a. Plans, supervises, conducts and participates in investigations.
 - b. Ensures that all work is conducted in accordance with prevailing professional standards.
 - c. Plans, attends and participates in meetings with local, state and federal enforcement and oversight authorities.
 - d. Plans and conducts training for Special Agents, Auditors and support staff.
 - e. Supervises and evaluates the intake of complaints and assigns matters for investigation or audit.
 - f. Testifies at official proceedings regarding investigations and findings.
 - g. Maintains a current working knowledge of Jefferson Parish structure, programs and administrative policies.
 - h. Maintains a current working knowledge of Jefferson Parish Civil Service Personnel Rules and operational policies/procedures.

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3. Staff performing investigations
 - a. Interviews witnesses and other individuals with knowledge pertaining to investigations.
 - b. Conducts overt and covert surveillance as necessary.
 - c. Collects and documents written, visual and electronic evidence.
 - d. Reviews and analyzes business documents such as bank records, invoices, receipts, corporate filings and financial statements.
 - e. Reviews government business documents such as business certifications, responses to public procurement solicitations, contracts and change orders.
 - f. Attends meetings and other activities, participating and providing information and oversight in an objective and professional manner.
 - g. Prepares written memoranda, correspondence and/or reports on any and all issues or activities that may be required, including the preparation of complex multi-issue investigative reports.
 - h. Testifies at official proceedings regarding investigations and findings.
 - i. Develops and maintains a working knowledge of Jefferson Parish structure, officials and programs, Administrative Management Policies, Civil Service Personnel Rules and operational policies and procedures.
 - j. Completes routine administrative duties, including appropriate documentation of investigative activities.
 - k. Attends and participates in all required training sessions.
 - l. Other related duties as necessary.

- F. Legal Essential Duties and Responsibilities
 1. Duties and responsibilities of the JPOIG Legal staff are to be set forth in respective position descriptions. *See Appendix* Position descriptions may be modified from time to time to comply with the policies and procedures.
 2. Deputy Inspector General (Legal)
 - a. Provide expert and independent legal counsel to the JPOIG and staff on a variety of matters including intra and inter-governmental relations.
 - b. Coordinate with appropriate federal, state and local prosecutorial authorities on all programmatic matters.
 - c. Determine the legal sufficiency of JPOIG investigative, audit and evaluation reports, and formally issued memorandum where findings and recommendations are made.
 - d. Provide general advice supporting legally sufficient operations within the JPOIG.
 - e. Respond to operational, audit, investigative and evaluation concerns when presented.
 - f. Administer, direct and monitor the JPOIG internal policies and procedures to ensure they are legally sufficient, represent industry

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best practices and provide for documental and transparent compliance.

- G. Other positions: Essential Duties and Responsibilities
1. Duties and responsibilities of other JPOIG staff are to be set forth in position descriptions. *See* Appendix.
 2. Position descriptions may be modified from time to time to comply with the policies and procedures established herein.
- H. Recruiting, staffing and training
- Recruiting, staffing and training activities are intended to support the JPOIG's mission and organizational structure.
1. Training for staff should include all minimum hours required to maintain key professional licenses that support the overall mission of the JPOIG.
 2. The JPOIG will reimburse costs of professional license renewal in accordance with the JPOIG policy and procedure and based upon availability of funding.
 3. The Inspector General is the appointing authority for all JPOIG employees, but the Inspector General may by policy and procedure delegate recruiting, staffing and supervisory authority to the 1st Assistant Inspector General or to a Deputy Inspector General.
- I. Quality assurance and internal evaluation
1. Internal quality assurance reviews serve as a means to assess the JPOIG's overall compliance with its established case management processes. Each Deputy Inspector General is responsible for developing a systematic method of internal quality review for cases within their divisions. Quality reviews are to include compliance with all aspects of the Audit and Investigation standards set forth in this manual.
 2. These quality reviews shall be conducted annually at the close of each calendar year covering the time period of the closing calendar year. Each Deputy Inspector General shall report the results of the internal quality review to the Inspector General annually by January 31st of each calendar year.

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Chapter 2 – Quality Standards for Office of Inspector General

Section: 2-4 Staff Qualifications

Subsection: 1 Basic Qualifications

AIG STANDARDS: AIG Quality Standards for Office – Staff Qualifications, Paragraph C, Basic Qualifications

IIA STANDARDS: N/A

PARISH ORDINANCE: N/A

STATE LAW: N/A

I. INTRODUCTION

OIG staff should collectively possess the variety of knowledge, skills and experience needed to accomplish its mission.⁴⁹

II. PURPOSE

The purpose of this section is to establish basic qualifications needed for the JPOIG as an organization.

III. SCOPE

This section applies to all JPOIG staff.

IV. POLICY

A. The qualifications set forth in this policy relate to the collective knowledge, skills and abilities of the JPOIG, not necessarily to any one staff member. It is the Inspector General's responsibility to assess the following:

1. Skills that can be obtained through outside contractors and consultants;
2. Effective utilization of staff members who possess requisite skills;
3. Need for staff development and training, or recruitment options.

B. Basic knowledge, skills and abilities

1. Knowledge of the JPOIG statutory requirements and applicable directives, rules and regulations.
2. Knowledge of entities, groups and individuals that interface with government agencies and programs within the JPOIG's jurisdiction.
3. Knowledge of Parish departments, agencies, special districts and other governmental organizations, programs, activities and functions within the JPOIG.
4. Technical skills, as needed, including but not limited to computer skills, word-processing applications, Excel, internet usage and other public records databases.
5. Analytic and investigative skills, as needed, including statistical sampling and analysis, factor analysis, trend analysis, systems and management analysis, undercover techniques and covert surveillance.

⁴⁹ AIG Quality Standards for Offices of Inspector General, Staff Qualifications, Subparagraph A.

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6. Organization skills, as needed, to include abilities to: 1) organize and maintain information and documents and 2) analyze and preserve data pertaining to investigations, audits and evaluations using various computer databases, spreadsheets and commercial and specialized software.
7. Communication skills, as needed, to include ability to draft, review or prepare investigative, audit or evaluation reports clearly addressing multiple issues and systems and including stated scope, actions taken, findings and recommendations.
8. Ability to evaluate the efficiency, economy and effectiveness of program performance within the JPOIG's jurisdiction.
9. Ability to review and process confidential case information with other JPOIG staff and deal with sensitive matters for the Inspector General.
10. Ability to engage in stand-alone efforts or works in conjunction with, or in support of, the JPOIG staff performing investigative, audit or evaluation activity.⁵⁰

C. Licensure and certifications

In addition to the above, appropriate licensure and certification in professional activities conducted by the JPOIG is a basic qualification.

V. PROCEDURE

- A. Minimal qualifications for JPOIG staff are set forth in respective position descriptions. Position descriptions may be modified from time to time to comply with the policies and procedures established herein. *See Appendix.*
- B. All JPOIG staff will be recruited based upon the following minimal qualifications:
 1. Excellent computer skills including word-processing applications, Excel, internet usage and other public records databases;
 2. Demonstrated ability to engage in stand-alone efforts or works in conjunction with others; and
 3. Excellent written and oral communication skills with demonstrated ability to draft, review and prepare investigative, audit or evaluation reports.
- C. JPOIG performing Legal will be recruited based upon the following minimal qualifications:
 1. Graduation from an accredited law school with an LL.B. or J.D. Degree;
 2. Active member in good standing with the Louisiana State Bar; and
 3. Eight years of progressively responsible experience in legal research, writing and document drafting, and two years of experience practicing law in the government forum on the local, state or federal level.
- D. JPOIG staff performing investigations, audits or evaluations will be recruited based upon the following minimal qualifications:

⁵⁰ AIG Quality Standards for Offices of Inspectors General, Staff Qualifications Subparagraph C.

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1. A Bachelor's Degree from an accredited college or university. Preferred fields of study are accounting, finance, management, business administration, public administration, criminal justice, social science or closely related fields; and
2. Relevant work experience in specific area of investigations, audits or performance reviews as set out in respective position descriptions;
3. One or more preferred certifications as set out in respective position descriptions, including but not limited to:
 - a. Certified Compliance and Ethics Professional (CCEP);
 - b. Certified Fraud Examiners (CFE);
 - c. Certified Internal Auditor (CIA);
 - d. Certified Information Systems Auditor (CISA)
 - e. Certified Public Accountant (CPA)
 - f. Certified Project Management Professional (PMP)
 - g. Certified by the Association of Inspectors General (AIG) as auditor, investigator, evaluator or inspector general.

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Chapter 2 – Quality Standards for Office of Inspector General Section: 2-4 Staff Qualifications

Subsection: 2 Skills Assessment and Staff Development

AIG STANDARDS: AIG Quality Standards for Office – Skills Assessment and Staff Development and Continuing Education

IIA STANDARDS: N/A

PARISH ORDINANCE: N/A

STATE LAW: La.R.S. 42:1170; La.Senate Concurrent Resolution No. 107, SLS 12RS-390

I. INTRODUCTION

An OIG must collectively possess a variety of knowledge, skills and experience to meet departmental mission.⁵¹

II. PURPOSE

The purpose of this policy is to establish guidelines for a skills assessment and staff development, including a program of professional development and continuing education, to improve public service through enhanced efficiency and effectiveness of employees, to build and retain a workforce of skilled professionals and to ensure currency and relevancy of practices. The achievement of relevant certifications supports professional skills enhancement, personal development and the overall mission of the JPOIG.

III. SCOPE

This section applies to all JPOIG staff.

IV. POLICY

A. The JPOIG will ensure that staff receive appropriate education regarding employment and meet mandatory education requirements for respective job positions.

B. Skills Assessment

To ensure that the JPOIG staff possesses needed skills, the Inspector General, or delegate, will:

1. Assess the skills of the JPOIG staff, individually and collectively;
2. Determine the extent to which these skills match the JPOIG staff requirements;
3. Establish a correction method to address any deficiencies;
4. Identify opportunities for staff development to meet JPOIG skill needs.⁵²

⁵¹ AIG Quality Standards for Offices of Inspector General, Staff Qualifications (A).

⁵² AIG Quality Standards for Offices of Inspector General; Staff Qualifications (D).

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C. Education and Staff Development

1. The JPOIG will provide the time and resources necessary for the JPOIG's staff to reasonably complete mandatory educational requirements, achieve and maintain one primary certification and one secondary certification. The JPOIG will provide time and resources necessary for the JPOIG staff to complete and achieve one specialized inspector general training. The JPOIG may consider providing time and resources to achieve advanced certifications or participate in additional educational opportunities if it serves a dual purpose of maintaining a primary or secondary certification.

2. Definitions

- **Mandatory Education** Education annually required by the state, the parish or the JPOIG.
- **Primary Certification** A certification required for initial hire or within a period of time post hire.
- **Secondary Certification** A certification that is: (1) directly related to the mission of the JPOIG and (2) recognized as providing knowledge, skills or abilities that can materially advantage a JPOIG staff member's performance.
- **Specialized Inspectors General** Certifications conferred by Association of Inspectors General (AIG) upon completion of Institute course.
- **Professional Development Work Plan** An approved work plan prepared by the JPOIG staff member identifying the certification sought, the relevance to their position and proposed schedule for achievement.

D. Mandatory Education

1. **Employee Orientation.** The Department of Human Resources conducts an orientation for all new Parish employees on matters relating to employee benefits, job safety and other pertinent orientation matters.
2. **JPOIG Orientation.** The JPOIG will conduct an orientation for all new JPOIG employees on matters relating to the Parish and JPOIG policies, procedures and operations.
3. **Ethics Education.** Staff shall participate in one hour of approved training on the Louisiana Code of Governmental Ethics once every calendar year.⁵³
4. **Sexual Harassment.** Staff shall participate in one hour of approved sexual harassment education and training each year.⁵⁴

⁵³ La.R.S. 42:1170.

⁵⁴ La.Senate Concurrent Resolution No. 107, SLS 12RS-390.

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- E. Mandatory Continuing Education
1. JPOIG staff performing investigations, inspections, evaluations, reviews or audits need to maintain their professional competencies through continuing education (CPE).
 2. JPOIG staff should complete at least 40 hours of CPE every 2 years that directly enhances professional proficiency. A minimum of half of these hours should be in subjects directly related to the person's primary responsibility (investigation, inspection, evaluation, review or audit) and the government environment.⁵⁵
- F. Primary Certification – Continuing Education
- Staff shall attend and fulfill mandated continuing education necessary to maintain certification/licensure and a proficiency level sufficient to properly perform job duties and responsibilities as set forth in the position description.
- G. Secondary Certification -- Professional Development Program
1. There is established a Professional Development Program (PDP) to facilitate the achievement of approved certifications through financial assistance, flexible scheduling and continuing commitments to the JPOIG.
 2. Approved Certification(s) under the PDP program include the following certifications. The list of approved professional certifications may be amended from time to time at the discretion of the Inspector General and based upon the needs of the office.
 - Certified Compliance and Ethics Professional
 - Certified Information System Auditor
 - Certified Internal Auditor
 - Certified Fraud Examiner
 - Certified Public Accountant
 - Certified Project Management Professional
 3. Continued Commitment Obligation
- Employees receiving funds pursuant to the Professional Development Program (PDP) are required to commit to 18 months of continued employment from the date of completion of the course, review or examination, whichever is the later.
4. Specialized inspectors general training
- There is established a program to receive specialized inspectors general training to facilitate the achievement of certification by the Association of

⁵⁵ AIG Quality Standards for Offices of Inspectors General, Staff Qualifications, Subparagraph E recommends 80 hours of CPE every two years.

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Inspectors General (AIG) through financial assistance and flexible scheduling.

5. Approved Certification(s) for specialized inspectors general training include the following certifications.
 - Certified Inspector General
 - Certified Inspector General Investigator
 - Certified Inspector General Auditor
 - Certified Inspector General Evaluator

H. Funding and Employee Reimbursement

1. Funding and reimbursement for education and training is subject to budgetary constraints and availability of funds.
2. Staff Development and Continuing Education
Continuing education, training and related costs may be provided on a reimbursement basis to the JPOIG staff to maintain the highest level of competence and skill within their professional disciplines.
3. Professional Development Program
 - a. Funding for Professional Development Program may be provided for approved expenditures on a reimbursement basis conditioned upon proof of satisfaction of completion and commitment to future employment.
 - b. Review courses. Funds may be expended or reimbursed for attendance in a recognized review course, and/or to obtain materials related to examination preparation and study.
 - c. Certification examinations. The Inspector General may approve expenditure of funds or reimburse costs required for examinations, or parts thereof, necessary to attain a professional certification.
4. Maximum Amount. JPOIG may reimburse up to \$5000 over the tenure of the JPOIG employee toward the costs associated with attaining secondary certifications approved by this policy. The maximum amount is exclusive of approved expenditure to obtain specialized inspectors general training.

V. PROCEDURE

A. Training and Education Opportunities

1. In-House Training
 - a. The JPOIG will provide in-house training as appropriate and feasible.
 - b. Staff will be given advance notice of in-house training sessions. Staff attendance at these sessions is mandatory unless informed otherwise by immediate supervisor.
 - c. Staff are encouraged to develop training blocks that share their expertise, identify and propose training blocks that can be presented by other industry professionals, or submit suggestions for in-house training topics.

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2. Outside Training
 - a. Staff who wish to attend outside training opportunities (regardless of the source of the training) must seek approval from supervising Deputy Inspector General.
 - b. Requests for outside training must be made in writing through staff member's immediate supervisor to the Inspector General even if there are no costs.
 - c. Examples of permitted outside training include, but are not limited to, conferences, seminars and participation in professional societies.
 3. Online Training
 - a. Staff may participate in up to one hour per month of online training (regardless of the source of the training) without approval from supervising Deputy Inspector General if there are no costs and credit is given for participation.
 - b. Staff who wish to attend outside training (regardless of the source of the training) must seek approval from supervising Deputy Inspector General.
 - c. Requests for online training, when required, must be made in writing through staff member's immediate supervisor to the Inspector General.
 - d. Examples of permitted on-line training include but are not limited to webinar, podcast or conference call.
- B. Professional Development Program
1. Submitting Professional Development Plan for approval
Staff seeking permission to pursue advance certification under PDP should submit a request in writing that includes the following:
 - a. Detailed information concerning the staff's educational background (i.e. current degrees and certifications)
 - b. The staff's educational goals and objectives
 - c. A narrative statement relating benefit of additional education/certification by staff to JPOIG
 - d. An itemized budget of anticipated and related expenses for tuition, study guides and associated fees
 - e. A detailed description of anticipated scheduling adjustments, if any, needed to attend courses, training, testing, etc.
 - f. Expected date to start and complete program of professional development
 2. Reviewing and modifying Professional Development Program
 - a. Staff shall keep the PDP current through annual review and modification, including documentation of the following:
 - i. Costs incurred;
 - ii. Educational leave and study time granted;
 - iii. All course participation, certifications attained and examination results.

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- b. The staff member's immediate supervisor shall review the PDP a minimum of once per year. PDP shall be amended as necessary and include staff member's annual performance evaluation.
- C. Requests and Approval
 1. Written requests must be submitted by completing the "Request for Training" form for all trainings, unless otherwise permitted, even if it is free and/or can be completed in the office. *See Appendix.*
 2. Supervisors are required to review and approve requests for trainings that occur out of the office or that require payment. Approval will be based on the following factors:
 - a. Benefit of the training to the JPOIG operations and mission;
 - b. Value of training to professional development;
 - c. Relevance to JPOIG's evolving human resource management plans; and
 - d. Service to the public interest.
- D. Documentation

All training and education must be properly documented.

 1. Course certificates or other proofs of successful completion of trainings will be maintained in the JPOIG staff member's personnel file.
 2. Acceptable documentation of successful completion of trainings include the following:
 - a. Registration forms;
 - b. Roster of attendees;
 - c. Certificates of completion;
 - d. Copy of course objectives;
 - e. Proof of continuing professional education credits.
 3. The JPOIG staff member and supervisor have the joint responsibility to ensure that training records are current, and that appropriate documentation resides in the staff member's personnel file.
- E. Reimbursement – Maintaining Certifications and Continuing Education
 1. The employee must request reimbursement of training costs, including any associated travel, when seeking approval for training.
 2. Training costs may be reimbursed, in part or in whole, according to this policy and other relevant policies upon approval.

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- F. Reimbursement -- Professional Development Plan
1. Funding for Professional Development Program will be provided to JPOIG staff for approved expenditures on a reimbursement basis conditioned upon receipt of the following:
 - a. A copy of the approved written professional development plan;
 - b. A completed and signed continued employment commitment letter;
 - c. Proof that the employee has registered and has been accepted to sit for the examination;
 - d. A copy of the employee's Notice to Schedule (NTS);
 - e. Documentation demonstrating registration for the certification or review course clearly setting forth registration and other fees due;
 - f. Accompanying support shall include proof of payment and a copy of a certified check, cashier's check, money order or credit/debit card statement;
 - g. Proof that the employee has enrolled in and successfully completed the testing, review, or course, to include certifications attained when applicable.
 2. Reimbursement to JPOIG – Exam Not Taken
 - a. An employee for whom funds have been expended, advanced and/or reimbursed under a professional development plan shall be required to provide full repayment to the JPOIG if they fail to take the scheduled examination or examination part, or fail to provide required documentation thereof. If an staff has to reschedule an examination or examination part that has been previously scheduled, they must submit proof of the newly scheduled date(s). If rescheduling of the examination or examination part incurs a fee, the employee will be responsible for the payment of any such fee, and this fee will not be reimbursed by the JPOIG.
 - b. The amount the staff is required to reimburse will be stated in a notice of demand furnished to the employee and shall be deducted from the employee's next scheduled paycheck(s), absent written exemption by the Inspector General.
 - c. All supporting documentation required under this section (i.e. paid receipts, course transcripts, exam registration, exam results, etc.) shall be incorporated into the employee's professional development plan and maintained in their employee personnel file.
 3. Reimbursement to JPOIG Upon Termination/Separation
 - a. Upon termination of employment with the JPOIG, an staff shall reimburse all professional development monies tendered (expended, reimbursed and/or advanced) to the employee on the employee's behalf during the period of the 18 months prior to their termination or employment. No reimbursement shall be required if the termination of employment is due to the death, permanent disability or retirement of the staff.

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- b. The amount an staff is required to reimburse the JPOIG shall be furnished to the employee through notice of a demand within a reasonable time prior to the employee's date of separation of employment with the JPOIG. The amount the staff is required to reimburse, as stated in the notice of demand, shall be deducted from the employee's final paycheck. In the event the staff's final paycheck is not sufficient to reimburse the entire amount owed, the staff, after receiving a notice of deduction, shall tender a personal check or money order to the JPOIG to cover the remaining portion owed prior to separation, absent written exemption by the JPOIG.

G. Compliance

1. The Inspector General and Deputy Inspector General are responsible for ensuring staff attend continuing professional educational and other professional development courses relating to their particular professional disciplines.
2. Documentation of compliance. All documentation shall be turned into the Inspector General – Administrative Assistant who is responsible for tracking compliance with mandated education and required education for licensure and proficiency.
3. The Inspector General – Administrative Assistant, with the assistance of the Deputy Inspector Generals, shall conduct a bi-annual audit of compliance by JPOIG staff with mandatory education and continuing education requirements for licensure and proficiency.

H. Follow-up

JPOIG staff receiving outside training may be required to provide an oral or written summary of training to the JPOIG staff. Relevant and non-prohibited training material should be made available to JPOIG staff members.

I. Staff Conduct

JPOIG staff attending and receiving outside training must remember that they are representing the JPOIG and must conduct themselves in a professional manner. JPOIG staff are reminded to adhere to the JPOIG's policies regarding confidentiality with regard to JPOIG business.

APPROVED BY:



Kim Raines Chatelain
Inspector General

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Chapter 2 – Quality Standards for Office of Inspector General Section: 2-4 Staff Qualifications

Subsection: 3 Professional licenses and membership

AIG STANDARDS: AIG Quality Standards for Office – Skills Assessment and Staff Development

IIA STANDARDS: N/A

PARISH ORDINANCE: N/A

STATE LAW: N/A

I. INTRODUCTION

An OIG must collectively possess a variety of knowledge, skills and experience to meet departmental mission.⁵⁶

II. PURPOSE

The purpose of this policy is to ensure the JPOIG staff continually meet mandates to hold essential professional certifications.

III. SCOPE

This section applies to all JPOIG staff.

IV. POLICY

A. Individuals holding JPOIG staff positions that require professional licenses or certifications will attain and maintain such licensures and/or certifications and remain in good standing with the licensing body.

B. The JPOIG will recruit and retain staff based upon the ability to attain and maintain certifications identified as essential to the JPOIG.

C. The below certifications are identified as essential to the JPOIG operations.

- Certified Inspector General
- Certified Inspector General Investigator
- Certified Inspector General Auditor
- Certified Inspector General Evaluator
- Certified Inspector General Investigator
- Certified Information System Security Personnel
- Certified Inspector General Inspectors/Evaluator
- Certified Internal Auditor
- Certified Fraud Examiner

⁵⁶ AIG Quality Standards for Offices of Inspector General, Staff Qualifications Subparagraph A.

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- Certified Ethics and Compliance Professional
- Certified Public Accountant
- Certified Fraud Examiner
- Certified Inspector General
- Certified Internal Auditor
- Certified Inspector General Auditor
- Certified Information Security Auditor
- Certified Inspector General Evaluator
- Certified Project Management Professional
- Certified Inspector General Investigator

- D. The JPOIG staff appointed to position of Legal must hold a license to practice law by the Louisiana State Supreme Court and be a member in good standing with the Louisiana State Bar Association.
- E. Suspension, revocation or disqualification of professional certifications and licenses will be cause for disciplinary action and/or termination.

V. PROCEDURE

- A. The JPOIG staff performing audits and investigations will possess required primary certifications upon employment or demonstrate the ability to attain required certifications within twelve months of employment.
- B. The JPOIG Legal will hold a license to practice law by the Louisiana State Supreme Court upon employment and be a member in good standing with the Louisiana State Bar Association.
- C. The JPOIG staff will be required to annually attest to compliance and good standing with mandates for professional certifications and licenses in conjunction with annual performance review.
- D. The JPOIG staff whose professional license and/or certification is suspended, revoked or otherwise deemed in bad standing will be disciplined and may be terminated.

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Chapter 2 – Quality Standards for Office of Inspector General Section: 2-5 Direction and Control

AIG STANDARDS: AIG Quality Standards for Office – Direction and Control

IIA STANDARDS: N/A

PARISH ORDINANCE: N/A

STATE LAW: N/A

I. INTRODUCTION

An OIG should direct and control operations to ensure that (1) all activities are adequately supervised; (2) performance is consistent with professional standards, and (3) periodic internal assessments are made of activities and accomplishments.⁵⁷

II. PURPOSE

The purpose of this section is to establish guidelines and procedures for ensuring that the JPOIG activities are adequately supervised, performance is consistent with professional standards, and there are periodic internal assessments of activities.

III. SCOPE

This section applies to all JPOIG staff.

IV. POLICY

A. Supervision

1. JPOIG supervisors at all levels should ensure that the JPOIG staff receive effective direction, guidance, oversight and training.
2. Proper supervision is required throughout project assignments:
 - a. Staff should explicitly understand, without ambiguity, the nature scope, content and timing of work assigned;
 - b. Staff should understand work product expected; and
 - c. Staff should receive interim feedback on progress of projects to sufficiently correct course of action when necessary.
3. Supervision will be exercised at each level of the organization and for each level of task responsibility based upon resources available, complexity and sensitivity of the work and experience of the JPOIG staff member.⁵⁸

⁵⁷ AIG Quality Standards for Offices of Inspectors General, Direction and Control Subparagraph A.

⁵⁸ AIG Quality Standards for Offices of Inspectors General, Direction and Control Subparagraph B.

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- B. Quality Control
 1. Quality control is understood to be the process by which supervisors ensure that the work of their immediate staff meets professional standards.
 2. JPOIG will establish and comply with procedures to ensure adequate quality control over the JPOIG work product.⁵⁹

- C. Assessing JPOIG Accomplishments
 1. The JPOIG will periodically assess its results and accomplishments against goals and objectives.
 2. The JPOIG will maintain a planning process to show expected performance and management information system showing past performance and results.
 3. The JPOIG will perform, where feasible, a cost-benefit analysis of various approaches to detect fraud, waste, abuse and mismanagement and encourage economy and efficiency.
 4. The JPOIG will endeavor to innovate.⁶⁰

- V. PROCEDURE
 - A. Supervision
 1. The JPOIG staff will receive general direction and guidance through orientation, education and training regarding Parish government, the JPOIG Manual of Policies and Procedures and Standard Operating Procedures for the respective JPOIG sections.
 2. The JPOIG staff will receive one-on-one supervision and guidance from supervising Deputy Inspector General, to include 1st Assistant Inspector General, regarding assignments, planning, course of action and progress.
 3. The JPOIG staff may receive one-on-one feedback from the Inspector General regarding work, work product, course of action and progress.
 - B. Quality Control
 1. The JPOIG will adopt Standard Operating Procedures for each function that will include policies and procedures to ensure adequate quality control over work and work product.
 2. The JPOIG will maintain a case management system that relates professional standards to investigation, evaluation, and audit activity to ensure work and work product meet professional standards.
 - C. Assessing JPOIG Accomplishments
 1. The JPOIG will maintain a case management system that supports periodic assessment of the JPOIG accomplishments as well as efficiency of operations and utilization of resources.

⁵⁹ AIG Quality Standards for Offices of Inspectors General, Direction and Control, Subparagraph C.

⁶⁰ AIG Quality Standards for Offices of Inspector General, Direction and Control, Subparagraph D.

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2. The JPOIG will maintain statistical information, where feasible and appropriate, concerning findings and recommendations, accepted recommendations and dollar value of identified waste.

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Chapter 2 – Quality Standards for Office of Inspector General Section: 2-6 Coordination

AIG STANDARDS: AIG Quality Standards for Office – Coordination
IIA STANDARDS: N/A
PARISH ORDINANCE: JPCO §2-155.10(11)(n)-(u)
STATE LAW: N/A

I. INTRODUCTION

An OIG should coordinate its activities internally and with other components of government to assure effective and efficient use of available resources.⁶¹

II. PURPOSE

The purpose of this section is to establish policy and procedure to ensure effective and efficient use of limited resources, and to avoid fragmentation or duplication of effort.

III. SCOPE

This section applies to all JPOIG staff.

IV. POLICY

- A. In planning work, the JPOIG will coordinate with appropriate officials, taking into consideration requests from other enforcement agencies, complaints from Parish employees and private citizens and needs of the Parish Council and the Administration.
- B. The JPOIG will take appropriate steps to minimize unnecessary, duplicative work by internally coordinating its own work and work with other groups performing independent evaluations and operations.
- C. The JPOIG will seek information concerning prior reviews of activity or function upon beginning a project, and may rely upon data to avoid redundancy.
- D. The JPOIG should be alert to situations or problems that might affect other governmental organizations. When such situations arise, the JPOIG should coordinate with other affected organizations, as appropriate.⁶²

V. PROCEDURE

- A. The JPOIG planning process for investigations, evaluations and audits will, where practicable, begin with research of available public filings and information relevant to subject matter, persons or entities subject of investigation, evaluation, or audit including:
 - 1. Public filings by elected officials;

⁶¹ AIG Quality Standards for Offices of Inspector General, Coordination, Subparagraph A.

⁶² AIG Quality Standards for Offices of Inspector General, Coordination, Subparagraph C.

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2. Public filings by entities;
 3. Past investigative reports, including past JPOIG investigations;
 4. Past evaluation reports, including past JPOIG evaluations;
 5. Past audit reports, including past JPOIG reports;
 6. Information regarding open or active investigations and audits by the JPOIG as well as other enforcement agencies.
- B. Coordination with Law Enforcement
1. The JPOIG staff will coordinate with outside investigative or law enforcement agencies so as not to duplicate efforts and/or hinder any ongoing criminal investigation. Coordination with an outside investigative or law enforcement agency will be brought to the attention of the Deputy Inspector General or the Assistant Inspector General/Legal Counsel who will closely monitor the activity.
 2. The JPOIG staff will not interfere with any ongoing criminal investigation upon explicit notification by the United States Attorney for the Eastern District of Louisiana, the Attorney General for the State of Louisiana, the District Attorney for the Parish of Jefferson or attendant law enforcement agency that JPOIG action is resulting in such interference.
- C. Coordination between the JPOIG staff and sections
1. The JPOIG will maintain a case management system that assembles and relates data in a manner to reduce internal risk of duplication or redundancy of efforts between and amongst the JPOIG staff and sections.
 2. The JPOIG staff will promptly notify the supervising Deputy Inspector General in writing upon recognizing duplication or redundancy of effort.
 3. Upon receipt of notice, the supervising Deputy Inspector General will report the matter to the Inspector General with a recommendation that may include recommendation to combine matters or amend existing investigative and audit plans.

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Chapter 2 – Quality Standards for Office of Inspector General

Section: 2-7 Reporting

Subsection: 1 Reports to Appropriate Officials

AIG STANDARDS:	AIG Quality Standards for Office – Reporting
IIA STANDARDS:	N/A
PARISH ORDINANCE:	JPCO §2-155.10(11)
STATE LAW:	La. R.S. 42:1161

I. INTRODUCTION

An OIG should inform appropriate officials through oral and written reports of important undertakings, outcomes, and any problem encountered that warrant the official's attention.⁶³

II. PURPOSE

The purpose of this section is to establish policies and procedures for the timely notification to appropriate officials concerning significant issues discovered during a JPOIG investigation, evaluations or audit and the timely notification to appropriate law enforcement officials when there are reasonable grounds to believe that a criminal violation has occurred. This written directive restates, in part, and is intended to satisfy the mandates established by Parish ordinance relating to the release of JPOIG reports.

III. SCOPE

This section applies to all JPOIG staff.

IV. POLICY

- A. The JPOIG will inform appropriate officials through oral or written communication of important undertakings, their outcomes and any problems encountered that warrant the officials' attention.
- B. The JPOIG will alert appropriate officials as early as possible to instances of criminal behavior or egregious waste that become known to the JPOIG, to the extent consistent with requirements imposed by confidentiality rules, the prosecutorial system, and effective investigation, evaluation, audit or other review by the JPOIG.
- C. The JPOIG will inform appropriate individuals as soon as possible, consistent with confidentiality requirements, of credible allegations or other evidence of a significant and immediate danger to the health or safety of people or property.
- D. The JPOIG will report to appropriate law enforcement agencies when there is a violation of federal, state or local criminal law and the matter is not subject to the jurisdiction of the JPOIG.

⁶³ AIG Quality Standards for Offices of Inspectors General, Reporting, Subparagraph A.

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V. PROCEDURE

A. Notification of Significant Issues – Imminent Risk

1. The JPOIG staff will notify the Inspector General through their immediate supervisor of any significant issues that may represent an imminent risk to the public's health, safety or welfare or an imminent risk of significant or gross financial loss.
2. If the Inspector General determines that such risk exists, then the Inspector General may notify appropriate Parish or other government officials or any other appropriate person or entity prior to the release of a report. Such notification may be verbal or in writing depending upon the level of risk and the exigency of the circumstances. Verbal notifications will be reduced to writing and noted in the JPOIG case file, if applicable, or at a minimum in the JPOIG's complaint registry as a complaint referral.
3. The Inspector General may make recommendations for the consideration of the Parish Council and Administration and/or other appropriate officials. These recommendations may include proposals for stopping the ongoing misconduct, implementing procedural and/or administrative changes, disciplinary action, instituting civil litigation to compel restitution and/or other appropriate action.

B. Notification to Law Enforcement

1. Upon discovering credible information of corruption, fraud, waste, abuse or illegal acts in carrying out duties of office, the JPOIG will report to the district attorney, or the United States attorney or other appropriate law enforcement agency.⁶⁴ The JPOIG will notify the appropriate law enforcement agencies when the JPOIG detects corruption or fraud. Such notification may be verbal or in writing depending on the level of risk and exigency of the circumstances. Verbal notifications will be reduced to writing and noticed in the JPOIG's main case file, if applicable, or at a minimum in the JPOIG's complaint registry as a complaint referral.
2. The JPOIG will notify the appropriate law enforcement agencies when the JPOIG detects an imminent risk of the commission of a crime. Such notifications may be verbal or in writing depending on the level of risk and the exigency of the circumstances. Verbal notifications will be reduced to writing and noted in the JPOIG main case file, if applicable, or at a minimum in the JPOIG complaint registry as a complaint referral.

C. Notification to the Louisiana State Board of Ethics

1. Upon detecting a potential violation of state ethics law, the JPOIG will notify the Louisiana State Board of Ethics pursuant to La.R.S. 42:1161.⁶⁵
2. Notifications may be made in the form of complaint or a referral to the Louisiana State Board of Ethics.

⁶⁴ JPCO §2-155.10(11)(o)

⁶⁵ JPCO §2-155/10(11)(t)

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3. Notifications will be documented in the JPOIG main case file, if applicable, or at a minimum in the JPOIG complaint registry as a complaint referral.
- D. Notification to the Ethics and Compliance Commission
1. Upon detecting a potential violation of a parish ethics ordinance or code, the JPOIG will notify the Ethics and Compliance Commission.⁶⁶
 2. Notifications may be in the form of complaint or a referral to the Louisiana State Board of Ethics.
 3. Notifications will be documented in the JPOIG main case file, if applicable, or at a minimum in the JPOIG complaint registry as a complaint referral.

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⁶⁶ JPCO §2-155.10(11)(u)



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Chapter 2 – Quality Standards for Office of Inspector General Section: 2-7 Reporting

Subsection: 2 Final Reports - Notice of Findings and Recommendations

AIG STANDARDS: AIG Quality Standards for Office – Reporting
IIA STANDARDS: N/A
PARISH ORDINANCE: JPCO §2-155.10(9)
STATE LAW: N/A

I. INTRODUCTION

An OIG final report should be distributed or otherwise made available to appropriate legislative bodies, interested parties, and the public to the extent consistent with the law, including requirements imposed by confidentiality.⁶⁷

II. PURPOSE

The purpose of this section is to establish policies and procedures for notification of findings, response submission, timeframes and inclusion of responses. This written directive restates, in part, and is intended to satisfy the mandates established by Parish ordinance relating to the release of JPOIG reports.

III. SCOPE

This section applies to all JPOIG staff.

IV. POLICY

A. Draft reports – response to draft reports

1. Prior to concluding a report or recommendation which contains findings as to the person or entity being reported, or who is the subject of the recommendation, the JPOIG will provide the affected person or entity a draft of the report or recommendation. Person or entity, for purposes of this policy, shall not include a person or entity incidentally named.⁶⁸
2. All intended recipients of the report, person or entities contained in findings, who is being reported or who is the subject of the recommendation, will be identified in the draft report. Identified recipients may be modified, as appropriate to include upon request of the Council or Administration, before the report is complete, finalized.
3. “Parish Draft Report”, the Parish President, any member of the Parish Council or persons in charge of any Parish department, agency board or commission may be provided a draft report as provided by ordinance.⁶⁹ Persons receiving a “Parish Draft Report” shall have thirty (30) working days to submit a written explanation or rebuttal of the findings and

⁶⁷ AIG Quality Standards for Offices of Inspectors General, Reporting, Subparagraph D.

⁶⁸ JPCO §2-155.10(9).

⁶⁹ JPCO §2-155.10(9).

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recommendations.⁷⁰ These reports will be marked, “Parish Draft Report,” and may contain confidential information, information which would not be subject to public records request, and/or information which is subject to other agreements of confidentiality and nondisclosure, but to which the person is permitted to receive.

4. “Non-Parish Draft Report,” persons other than those designated to receive a “Parish Draft Report,” but who are otherwise entitled to submit a written explanation or rebuttal of findings and recommendations, will be provided a draft report after thirty (30) working days and shall have twenty (20) working days to submit a written explanation or rebuttal of the findings and recommendations.⁷¹ These reports will be marked, “Non-Parish Draft Report,” and any information which would not be subject to public records requests, and/or information which is subject to other agreements of confidentiality and nondisclosure affecting the Parish shall be redacted.
5. In cases where there are more than one person or entity who is the subject of findings or recommendation, the JPOIG will provide each with a draft report or access to a draft report.
6. “Person,” for purposes of this section, does not include Parish employees except as otherwise provided. Reports involving employee misconduct or abuse will be directed to the employee’s appointing authority and director, where appropriate, in draft form for response or rebuttal.⁷²
7. Timely submitted written response received by persons or entities being reported or who is the subject of a recommendation will be attached to the finalized report.⁷³
8. Requests for additional time to provide responses must be submitted in writing to the JPOIG. Request for extensions of time will be reviewed and granted on a case-by-case basis.

B. Document control and confidentiality

1. The JPOIG will maintain document control to ensure the integrity of the reporting system to the full extent possible.
2. The JPOIG draft reports and recommendations are considered confidential and privileged and protected from disclosure. The draft report shall not be disclosed, reproduced, distributed, or disseminated, in whole or in part, by any recipient until such time as the report is finalized.
3. The JPOIG may take appropriate action and/or recommend disciplinary action for the unauthorized disclosure, reproduction, distribution or dissemination of draft reports.

C. Receipt of responses and finalization of reports

1. The JPOIG will review written response(s) received from persons or entities being reported or who are the subject of the recommendation. If

⁷⁰ JPCO §2-155.10(9).

⁷¹ JPCO §2-155.10(9).

⁷² JPCO §2-155.10(9).

⁷³ JPCO §2-155.10(9).

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the JPOIG requires further investigation, evaluation or audit fieldwork, it will be conducted, and/or the report will be revised accordingly.

2. The final report will document receipt of a timely submitted written response(s) attached to the final report as an appendix. The JPOIG's rebuttal to any response, if any, will be incorporated into the final report. The report will then be issued accordingly.
3. If no written response is received, the report will be finalized and issued accordingly.

D. Final reports

1. Final reports are reports that have gone through the draft report process.
2. Final reports will be provided to the Ethics and Compliance Commission at the conclusion of the draft process, and upon direction and request, a copy will be provided to General Counsel for the Ethics and Compliance Commission.⁷⁴
3. Recipients of draft reports will be provided with copies of or access to the final report.
4. The JPOIG will issue a public version of the report upon expiration of at least five (5) business days.

V. PROCEDURE

A. All persons who are intended recipients will receive notice of the opportunity to submit a written explanation or rebuttal to a draft report. The notice may be sent via ordinary mail, hand-delivery or other appropriate means. The notice to intended recipients will be maintained as part of the case file.

B. Distribution of confidential draft reports

1. All draft reports will refer to Case Number and staff assigned to the matter.
2. All draft reports will contain the following "Notice of Confidentiality:"

"This confidential memorandum is issued by the Inspector General pursuant to the authority conferred by JPCO §2-155.10. It is intended for the sole use of the named recipients. It is not intended to be read, disclosed, reproduced, distributed, disseminated, in whole or in part for any purpose other than review and comment by the recipients. The JPOIG reports that have not been completed shall be deemed confidential and privileged and protected from disclosure. The report may also contain confidential information, information which would not be subject to public records request, and/or information which is subject to other agreements of confidentiality and nondisclosure."

⁷⁴ JPCO §2-155.10(9).

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3. Reports will be clearly marked “CONFIDENTIAL PARISH DRAFT REPORT” or “CONFIDENTIAL NON-PARISH DRAFT REPORT,” as appropriate.
 4. Intended recipients will receive a “Notice” that a confidential draft JPOIG report will be released containing important dates and deadlines.
 5. Reports may be distributed via hand-delivery or electronic access.
 6. Recipients will be required to acknowledge receipt and/or access to the report before viewing the draft report. If written, the “Acknowledgement” will reflect the (a) case number; (b) date delivered; (c) printed name of person accepting delivery; (d) signature of person accepting delivery; (e) and acknowledgement of confidentiality. Signed “Acknowledgements” will be maintained with the case file. If electronic, all persons receiving the report electronically will be identified and maintained with the case file.
 7. Delivery of confidential reports by means other than in person will be documented in the file. The documentation will include the date, method of delivery and evidence of receipt, where possible.
- C. Receipt of responses and finalization of reports
1. The JPOIG will review timely received responses and determine whether additional field work is required.
 2. If additional fieldwork is required, the JPOIG will give written notice to recipients of report that additional field work will be undertaken.
 3. The JPOIG may, at the discretion of the Inspector General, reissue a second draft report at the conclusion of any additional fieldwork.
 4. If no additional fieldwork is required, the report will be finalized and incorporate the responses in the appendix.
 5. If the report contained confidential information, information which would not be subject to public records request, and/or information which is subject to other agreements of confidentiality and nondisclosure, then such information will be redacted from a final report if the recipient is not a person entitled to receive such information.
- D. Final reports
1. Final reports will be hand delivered or otherwise made available to recipients of the Parish and Non-Parish Draft Report and to members of the Ethics and Compliance Commission. At the direction and request of the Ethics and Compliance Commission, a final report will be available to the General Counsel in a like manner. Delivery and receipt of reports will be documented in case files.

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2. JPOIG will publish final reports on the JPOIG website upon expiration of at least five (5) business days.

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Chapter 2 – Quality Standards for Office of Inspector General Section: 2-7 Reporting

Subsection: 3 Periodic Reports – Annual Reports

AIG STANDARDS: AIG Quality Standards for Office - Reporting
IIA STANDARDS: N/A
PARISH ORDINANCE: JPCO §2-155.10(9)(a)-(10)
STATE LAW:

I. INTRODUCTION

An OIG should issue periodic reports summarizing the OIG’s activities, findings, recommendations, and accomplishments since the prior reporting period.⁷⁵

II. PURPOSE

The purpose of this section is to establish policy and procedure for periodic and annual reporting by the JPOIG.

III. SCOPE

This section applies to all JPOIG staff.

IV. POLICY

- A. The JPOIG will report its findings and recommendations to the Ethics and Compliance Commission.
- B. The JPOIG will periodically report on activities and accomplishments to the Ethics and Compliance Commission.
- C. The JPOIG will annually report on the activities of the office for the preceding calendar year to the Ethics and Compliance Commission, on or before the 31st of March.

V. PROCEDURE

- A. Report on findings and recommendations
The JPOIG will provide a copy of a report on its findings and recommendations to the Ethics and Compliance Commission under a separate cover letter.
- B. Periodic reports
The JPOIG will periodically brief the Ethics and Compliance Commission on JPOIG activities, including the following, when permissible by law:
 - 1. A description of significant problems with the JPOIG’s jurisdiction and JPOIG recommendations for corrective action, including any recommendations for statutory changes;

⁷⁵ AIG Quality Standards for Offices of Inspectors General, Reporting Subparagraph E.

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2. Identification of each significant recommendation described in previous periodic JPOIG reports that have not resulted in corrective action;
3. A summary of referrals to prosecutorial authorities and the prosecutions, convictions, recoveries and other results from such referrals;
4. A summary of civil and administrative referrals and the results from such referrals;
5. A description of audits, evaluations or other reports completed during the reporting period; and
6. A statement of recommended amendments to the statute, ordinance, regulations or procedures affecting the JPOIG's effectiveness or operation.⁷⁶

C. Annual report

1. The JPOIG will provide a written report to the Ethics and Compliance Commission on or before the 31st of March each calendar year on the activities of the office for the preceding calendar year. The report will describe accomplishments of the office.⁷⁷
2. The JPOIG will provide a copy of the annual report to the Parish Council, Parish President and any oversight agencies interested in the activities of the JPOIG.
3. The JPOIG will notify members of the media electronically when the report has been issued and provide a copy upon request.
4. The JPOIG will post the report on its website www.jpoig.net.

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Kim Raines Chatelain
Inspector General

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⁷⁶ AIG Quality Standards for Offices of Inspectors General, Reporting, Subparagraph E.

⁷⁷ JPCO §2-155.10(10).



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Chapter 2 – Quality Standards for Office of Inspector General Section: 2-8 Confidentiality

AIG STANDARDS:	AIG Quality Standards for Office – Confidentiality
IIA STANDARDS:	N/A
PARISH ORDINANCE:	JPCO §2-155.10(8)
STATE LAW:	La.R.S. 33:9614

I. INTRODUCTION

An OIG should establish and follow procedures for safeguarding the identity of confidential sources and for protecting privileged and confidential information. OIG should ensure that confidential sources who make complaints or provide information to the OIG will not have their identities disclosed without their consent unless the OIG determines that such disclosure is required by law or necessary to further the purpose of an audit, investigation, inspection, evaluation, review or other inquiry. The OIG should ensure that privileged or confidential information gathered by the OIG will be protected from disclosure unless the OIG determines that such disclosure is required by law or necessary to further the purposes of an audit, investigation, inspection, evaluation, review or other inquiry.⁷⁸

II. PURPOSE

The purpose of this policy is to establish procedures to ensure guarding of privileged, confidential and/or otherwise protected information when accessed by JPOIG employees. This policy is not intended to address requests for information, access to information that is related to JPOIG personnel files or personal to individual JPOIG staff, or information that is routine and therefore not privileged, confidential or otherwise protected from disclosure.

III. SCOPE

This section applies to all the JPOIG staff.

IV. POLICY

- A. The JPOIG staff shall not comment on the existence or status of an investigation, investigatory procedures being utilized or information being gathered except as investigative needs require or upon express permission of the Inspector General, the 1st Assistant Inspector General or the appropriate Deputy Inspector General.
- B. The JPOIG is in the fact-gathering business. Information gathered often concerns personal or propriety matters.⁷⁹ The JPOIG staff shall not disclose any information that may reasonably be considered confidential, privileged or otherwise protected, nor shall such information be referenced in a report, absent a specific review and determination by the Legal, the 1st Assistant Inspector

⁷⁸ AIG Quality Standards for Office of Inspector General, Confidentiality Subparagraph A.

⁷⁹ AIG Quality Standards for Office of Inspector General, Confidentiality Subparagraph C.

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General or Inspector General as to the appropriate and legal use of the information.

- C. The JPOIG staff shall protect sensitive information compiled during the course of audits, investigations, inspections, evaluations, reviews or other inquiries.⁸⁰
- D. The JPOIG staff shall safeguard the identities of confidential sources and protect sensitive information compiled during the course of audits, investigations, inspections, evaluations, reviews or other inquiries.⁸¹
- E. The disclosure of any records pertaining to the JPOIG work will only be as required by law, after consultation with the JPOIG legal counsel, and in accordance with the procedures above.

V. PROCEDURE

- A. The JPOIG staff will acknowledge in writing to the understanding that there is an affirmative obligation under state law to:
 - 1. Maintain the confidentiality of records gathered and proceedings conducted in the course and scope of my job duties for the JPOIG.
 - 2. Maintain the confidentiality of records submitted to any law enforcement or regulatory agency for further investigation or for criminal or civil prosecution until such investigation or prosecution has been completed or becomes inactive. *See Appendix.*
- B. The JPOIG staff shall guard against any unauthorized access, use or disclosure of information that is privileged, confidential or otherwise protected and that is viewed or gathered in the course of their JPOIG duties.
- C. The JPOIG staff shall whenever practicable segregate, redact or otherwise protect information that is privileged, confidential or otherwise protected from disclosure. This may include, but is not limited to, storing information on a device that is password protected and ensuring that documents are not left unattended in an area accessible to the public.
- D. The JPOIG staff are to immediately notify their supervisor in writing upon reasonable belief that confidential or privileged information has been compromised or is at risk of being compromised. The written notification shall include the time and date that the information was compromised, all persons who may have knowledge of the compromise, a description of the confidential and privileged information compromised, and the original source of the information.

⁸⁰ AIG Quality Standards for Office of Inspector General, Confidentiality Subparagraph C..

⁸¹ AIG Quality Standards for Office of Inspector General, Confidentiality Subparagraph C.

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- E. The JPOIG reports and communications, including but not limited to draft reports, final reports, written requests and correspondence, which may include confidential and privileged information, shall undergo legal review before release or otherwise be approved by the Inspector General.

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Kim Raines Chatelain
Inspector General

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Chapter 2 – Quality Standards for Office of Inspector General Section: 2-9 Quality Assurance

AIG STANDARDS: AIG Quality Standards for Office – Quality Assurance
IIA STANDARDS: N/A
PARISH ORDINANCE: JPCO §2-155.10(16)
STATE LAW: N/A

I. INTRODUCTION

An OIG should establish and maintain a quality assurance program to ensure that work performed adheres to established OIG policies and procedures, meets established standards of performance, and is carried out economically, efficiently, and effectively.⁸²

II. PURPOSE

The purpose of this section is to establish the policy and procedures to ensure that the JPOIG work meets standards of performance and is carried out economically, efficiently and effectively.

III. SCOPE

This section applies to all JPOIG staff.

IV. POLICY

- A. The JPOIG investigations, evaluations, and audits are subject to annual quality assurance reviews by a third-party advisory committee. The JPOIG will receive and respond to recommendations made by the third-party advisory committee.
- B. The JPOIG will submit to peer review by the Association of Inspectors General every three years beginning in 2017. The JPOIG will comply with recommendations of the peer review within ninety (90) days, provided that the recommendations and findings are accepted and approved by the Ethics and Compliance Commission.
- C. The JPOIG will maintain a case management system that shows the status, progress and results of the JPOIG efforts. The case management system should support analysis data to include timely completion of tasks and compliance with professional standards.

⁸² AIG Quality Standards for Office of Inspector General, Quality Assurance, Subparagraph A

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V. PROCEDURE

- A. The JPOIG will cooperate with annual quality assurance review by the third-party advisory committee. The JPOIG will receive and respond to recommendations made by the third-party advisory committee.
- B. The JPOIG will submit to peer review by the Association of Inspectors General every three years beginning in 2017.
- C. The Inspector General and Deputy Inspectors General will regularly assess timeliness of tasks and compliance with professional standards.

APPROVED BY:

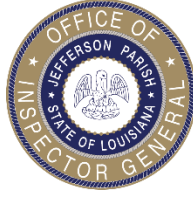


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Chapter 3 – Quality Standards for Inspector General Investigations

Chapter 3 identifies the quality standards established by the Association of Inspectors General for investigations. The JPOIG adopts these quality standards. The sections in this chapter establish policies and procedures to ensure these quality standards are met. These policies and procedures address planning, conducting, and documenting investigations as well as gathering and preserving case supporting materials and reporting of investigative results and conclusions. .



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Chapter 3 – Quality Standards for Inspector General Investigations

Section: 3-1 General Standards

Subsection: 1 Compliance with Principles and Standards for Offices of Inspectors General

AIG STANDARDS: AIG Quality Standards for Investigations - General
IIA STANDARDS: N/A
PARISH ORDINANCE: JPCO §2-155(13)
STATE LAW: N/A

I. INTRODUCTION

Standards for initiating and conducting investigations by the JPOIG will conform to the Principles and Standards for the Offices of Inspectors General, Association of Inspector General.⁸³

II. PURPOSE

The purpose of this section is to establish policies and procedures for conducting investigations in a manner compliant with the Principles and Standards for the Offices of Inspectors General, Association of Inspector General.

III. SCOPE

This policy applies to JPOIG staff performing investigative functions

IV. POLICY

- A. It is the policy of the JPOIG that standards for initiating and conducting investigations by the JPOIG will conform to the General Standards identified by the Principles and Standards for the Offices of Inspectors General, Association of Inspector which are as follows:
1. Staff qualifications: individuals assigned to conduct investigative activities possess needed knowledge, skills and experience.
 2. Independence: JPOIG staff assigned to investigations are free from personal or external impairments.
 3. Due professional care: Due professional care should be used in conducting investigations and in preparing accompanying reports.
- B. It is the policy of the JPOIG that standards for initiating and conducting investigations by the JPOIG will conform to the Qualitative Standards identified by the Principles and Standards for the Offices of Inspectors General, Association of Inspector which are as follows:
1. Quality control
 2. Planning
 3. Data collection and analysis

⁸³ AIG Quality Standards for Investigations by Office of Inspector General.

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4. Evidence
5. Timeliness
6. Reporting
7. Confidentiality
8. Follow-up

V. PROCEDURE

- A. The JPOIG staff are to initiate and conduct investigations in a manner consistent with the Principles and Standards for the Offices of Inspectors General, Association of Inspector General as set forth in this Manual of Policies and Procedures and in the Investigations Standard Operating Procedures.
- B. The JPOIG staff are to plan and execute investigations for the purpose of:
 1. Identifying and documenting sufficient factual information and evidence to determine whether violations of law or policy have occurred.
 2. Reporting accurately and ensuring that findings are appropriately supported.
 3. Supporting and tracking corrective actions taken as a result of investigative findings and efforts.
- C. Investigative activity and actions in the areas of planning, data collection, maintaining confidentiality, timeliness and reporting are to be documented in a case management system.

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Chapter 3 – Quality Standards for Inspector General Investigations Section: 3-2 General Standards Subsection: 2 Staff Qualifications

AIG STANDARDS: AIG Quality Standards for Investigations – Staff
IIA STANDARDS: N/A
PARISH ORDINANCE: N/A
STATE LAW: N/A

I. INTRODUCTION

Individuals assigned to conduct investigative activities should collectively possess the knowledge, skills, and experience required for investigative work.⁸⁴

II. PURPOSE

The purpose of this section is to establish policies and procedures to ensure individuals assigned to conduct investigative activities collectively possess the knowledge, skills and abilities required for investigative work.

III. SCOPE

This policy applies to JPOIG staff performing investigative functions.

IV. POLICY

- A. The General Standard of Staff Qualifications contained in the Quality Standards for Offices of Inspector General shall apply to investigations performed by the JPOIG staff.
- B. The supervising Deputy Inspector General is responsible for ensuring that the JPOIG staff collectively possess the necessary skills to conduct an investigation. At a minimum, these skills include:
 1. Familiarity with Jefferson Parish government and its functions, activities, projects, programs, records, contacts, policies and procedures.
 2. Prior investigative knowledge and experience in the areas of fraud, waste, abuse and misconduct.
 3. Training in the detection, investigation and prevention of fraud, waste, abuse and misconduct in Parish government.
 4. Educational background in the subject area being reviewed and/or generally with respect to fraud, waste, abuse and misconduct investigations.
 5. Ability to conduct preliminary research necessary to carry out the types of investigations conducted by the JPOIG.
 6. Specialized or technical skills depending on the subject matter being investigated.

⁸⁴ AIG Quality Standards for Investigations for Office of Inspector General, General Standards, Subparagraph A.

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V. PROCEDURE

- A. The General Standard for staff qualifications contained in the Quality Standards for Offices of Inspector General set out in Section 2-4 shall apply to investigations performed by the JPOIG staff. The supervising Deputy Inspector General will ensure that investigative team members possess qualifications contained in the Quality Standards for Offices of Inspector General set out in Section 2-4.
- B. The supervising Deputy Inspector General will annually assess and evaluate staff under this policy to determine whether staff individually and collectively possesses the below qualifications:
1. Familiarity with Jefferson Parish government and its functions, activities, projects, programs, records, contacts, policies and procedures.
 2. Prior investigative knowledge and experience in the areas of fraud, waste, abuse and misconduct.
 3. Training in the detection, investigation and prevention of fraud, waste, abuse and misconduct in Parish government.
 4. Educational background in the subject area being reviewed and/or generally with respect to fraud, waste, abuse and misconduct investigations.
 5. Ability to conduct preliminary research necessary to carry out the types of investigations conducted by the JPOIG.
 6. Specialized or technical skills depending on the subject matter being investigated.
- C. The supervising Deputy Inspector General will provide a written report to the Inspector General on the 31st of January with the results of the evaluation and assessment.

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Chapter 3 – Quality Standards for Inspector General Investigations

Section: 3-1 General Standards

Subsection: 3 Independence

AIG STANDARDS: AIG Quality Standards for Investigations - General
IIA STANDARDS: N/A
PARISH ORDINANCE: JPCO §2-155.10
STATE LAW: N/A

I. INTRODUCTION

An OIG involved performing or supervising any investigative assignment must be free from personal or external impairments to independence and should constantly maintain an independent attitude and appearance.⁸⁵

II. PURPOSE

The purpose of this section is to establish policies and procedures to ensure that staff conducting investigations are free from personal or external impairments to independence.

III. SCOPE

This policy applies to JPOIG staff performing investigative functions.

IV. POLICY

A. The JPOIG staff performing investigations will comply with the General Standard of Staff Qualifications contained in the Quality Standards for Offices of Inspector General.⁸⁶

B. The JPOIG staff performing investigations are to maintain an independence in all matters under review. The JPOIG staff will maintain a mental attitude free of partiality or bias and be free of any conflicts of interest.

C. The JPOIG staff performing investigations should not to be placed in situations where they are unable to make objective, professional judgments

V. PROCEDURE

A. The JPOIG staff will comply with the General Standard of Independence contained in the Quality Standards for Offices of Inspector General set out in Section 2-1, Independence from Personal and External Impairments.

B. The JPOIG staff will attest to and document their independence on each assignment, intake or case through the case management system.

⁸⁵ AIG Quality Standards for Investigations for Office of Inspector General, General Standards, Subparagraph B

⁸⁶ The elements of independence as they pertain to the JPOIG foundation are set forth in Chapter 1.6 Independence.

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- C. The JPOIG staff will promptly document any conflict of interest which may arise through the case management system and report the conflict of interest situations to the Deputy Inspector General-Investigations, the 1st Assistant Inspector General, or the Inspector General in accordance with Section 2-1, *Independence from Personal and External Impairments*.
- D. Reported conflicts will be assessed, and case agents will be reassigned as appropriate.

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Chapter 3 – Quality Standards for Inspector General Investigations

Section: 3-1 General Standards

Subsection: 4 Due Professional Care

AIG STANDARDS: AIG Quality Standards for Investigations – General
IIA STANDARDS: N/A
PARISH ORDINANCE: JPCO §2-155.10
STATE LAW: N/A

I. INTRODUCTION

OIG investigative staff should exercise due professional care in conducting investigations and in preparing accompanying reports.⁸⁷

II. PURPOSE

The purpose of this section is to establish policies and procedures to ensure that staff exercise due professional care conducting investigations and preparing reports.

III. SCOPE

This policy applies to the JPOIG staff performing investigative functions.

IV. POLICY

- A. Exercising due professional care means using good judgment in choosing investigation subjects and methodology as well as creating accurate and complete investigation documentation and investigative reports.⁸⁸
- B. Due professional care presumes a working knowledge consistent with investigative objectives.
- C. JPOIG investigations will be conducted with due professional care under the following basic tenets:
1. Standards -- JPOIG investigators should follow AIG professional standards and comply with applicable standards of conduct.
 2. Thoroughness – JPOIG investigations should be conducted in a diligent and complete manner; and reasonable steps will be taken to ensure that sufficient relevant evidence is collected; pertinent issues are sufficiently resolved; and appropriate criminal, civil, contractual, or administrative remedies are considered.
 3. Legal requirements – Investigations should be initiated, conducted, and reported in accordance with (a) all applicable laws, rules, and regulations; (b) guidelines from applicable prosecutorial authorities; and (c) internal agency policies and procedures. Investigations will be conducted with due respect for rights and privacy of those involved.

⁸⁷ AIG Quality Standards for Investigations for Office of Inspector General, General Standards, Subparagraph C.

⁸⁸ AIG Quality Standards for Investigations for Office of Inspector General, General Standards, Subparagraph C.

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4. Appropriate techniques – Methods and techniques used in each investigation should be appropriate for the circumstances and objectives.
5. Objectivity – Evidence should be gathered and reported in a fair and unbiased manner where determining the efficacy of alleged improprieties or evaluate the likelihood of violations of statutes, rules or regulations.
6. Ethics – At all times the actions of the JPOIG investigators should conform to the high standards expected of the JPOIG staff.
7. Timeliness – Investigations should be conducted in a timely manner while recognizing the individual complexities of each investigation.
8. Accurate and Complete Documentation – Investigative findings, conclusions, and outcomes (such as indictments, convictions, and recoveries) should be supported by adequate documentation.
9. Coordination – Appropriate JPOIG staff should coordinate investigations with appropriate officials. In cases where civil or administrative actions are necessary, appropriate JPOIG staff should coordinate actions with prosecutors and other appropriate officials.⁸⁹

V. PROCEDURE

A. Thoroughness and Documentation

The JPOIG staff will document actions and activity taken in the course of an investigation as well as compliance with applicable professional standards in the case management system.

B. Legal Requirements and Appropriate Techniques

1. The JPOIG staff will anticipate and incorporate reasonable investigative techniques into the planning process;
2. The JPOIG staff will consult legal counsel, as appropriate, and obtain necessary approval from the supervising Deputy Inspector General or Inspector General prior to the execution of certain investigative techniques as required by the JPOIG policies and procedures and applicable Standard Operating Procedures.

C. Objectivity and Ethics

1. The JPOIG staff will comply with Section 2-1 of the JPOIG Policies and Procedures addressing Independence from Personal and External Impairments.
2. The JPOIG staff member will attest to and acknowledge that there are no conflicts of interest which would impair judgment or acknowledge such conflicts of interest in each assigned matter through the case management system.

D. Coordination

1. The JPOIG staff will comply with Section 2-6 of the JPOIG Policies and Procedures addressing Coordination in all investigative matters.

⁸⁹ AIG Quality Standards for Investigations for Office of Inspector General, General Standards, Subparagraph C.

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2. The JPOIG staff will be alert to credible information of corruption, fraud, waste, abuse or illegal acts and will, upon discovery, report information in writing to the supervising Deputy Inspector General.
3. After assessing information, the supervising Deputy Inspector General will promptly notify the Inspector General.
4. The Inspector General will assess whether information is credible and must be reported to the district attorney, the United States attorney, or other appropriate law enforcement agency.⁹⁰

E. Timeliness

1. The JPOIG staff will prioritize investigations, weighing needed and available resources, to ensure investigative efforts are represented in work product which is current and relevant to Parish government.
2. The supervising Deputy Inspector General will regularly review progress on open cases with staff to ensure cases are appropriately prioritized to ensure timeliness of work product.

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Inspector General

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⁹⁰ JPCO §2-155.10(11)(o).



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Chapter 3 – Quality Standards for Inspector General Investigations

Section: 3-2 Qualitative Standards

Subsection: 1 Quality Control

AIG STANDARDS: AIG Quality Standards for Investigations - Qualitative
IIA STANDARDS: N/A
PARISH ORDINANCE: JPCO §2-155.10
STATE LAW: N/A

I. INTRODUCTION

OIG should develop appropriate procedures for determining and documenting that supervision has been adequately exercised to ensure quality and expedite progress of investigations.⁹¹

II. PURPOSE

The purpose of this section is to establish policies and procedures to ensure adequate control over quality and progress of investigations.

III. SCOPE

This policy applies to JPOIG staff performing investigative functions.

IV. POLICY

- A. The JPOIG staff should prioritize assigned cases in the following manner to ensure appropriate use of time and resources:
1. High priority: Investigations which involve allegations against elected officials or high-level public employees in sensitive positions; allegations of criminal conduct; allegations of significant dollar value involving waste of public funds; allegations of systematic fraud or corruption; and threats to public safety.
 2. Medium priority: Investigations which involve allegations of non-criminal conduct; allegations against non-supervisory public employees; non-specific allegations which are indicia of trends or patterns of fraud, waste and abuse.
 3. Low priority: Investigations involving allegations of regulatory infractions or policy infractions by a single individual with minimal impact on Parish government, as an organization.
- B. The supervising Deputy Inspector General should exercise proper supervision from start of work through its completion to ensure investigations are properly prioritized and progress according to plan.
- C. The supervising Deputy Inspector General should ensure that the JPOIG staff clearly understand assignments and tasks before work is begun.

⁹¹ AIG Quality Standards for Investigations, Qualitative Standards, Subparagraph A.

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- D. The JPOIG staff should work cooperatively with each other and the supervising Deputy Inspector General to recognize and acknowledge not only what work is to be done but also how to proceed and what is expected.

V. PROCEDURE

- A. The JPOIG staff will maintain case files in an organized manner to include the following:
 - 1. Investigative Plan: A written Investigative Plan will be completed for all investigations. The Investigative Plan will be prepared by the Investigative staff assigned to the case and will outline the preliminary investigative steps anticipated and estimated time and resources required. Investigative Plans will be reviewed approved by the Deputy Inspector General – Investigations before implementation;
 - 2. Evidence and Case Supporting Material: All evidence and case supporting material collected during the course of an investigation will be properly documented and maintained;
 - 3. Interviews: All interviews pertaining to an investigation will be properly conducted and documented;
 - 4. Documented Investigative Activity: All pertinent investigative activities will be documented in the JPOIG case management system;
 - 5. Written Report: At the conclusion of an investigation, a written report or memorandum, as appropriate, will be prepared; and
 - 6. Attachment and other supporting material to include ordinances, case law, open source material, etc.
- B. The JPOIG staff will document actions and activity in the JPOIG Case management system.
- C. The supervising Deputy Inspector General will conduct progress reviews to verify the following:
 - 1. Investigations are progressing in an efficient, effective, thorough and objective manner;
 - 2. Investigations have been appropriately prioritized to ensure best use of time and resources; and
 - 3. Investigative actions and activity are documented in the case management system, and files are maintained in an organized manner per procedures.
 - 4. Investigative plans are followed, except as amended and approved.
 - 5. Evidence adequately supports the findings, recommendations and any referrals for possible criminal, civil, or administrative actions.
 - 6. Investigation objectives are met in a timely manner or extensions of time are documented.
- D. The supervising Deputy Inspector General will meet regularly with the JPOIG staff, collectively and individually, to assess whether staff understand what work is to be done, how to proceed and what is expected.

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- E. The supervising Deputy Inspector General should, where appropriate, document meetings with Investigative staff, cases reviewed and guidance provided.

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Kim Raines Chatelain
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Manual of Policies and Procedures

Chapter 3 – Quality Standards for Inspector General Investigations

Section: 3-2 Qualitative Standards

Subsection: 2 Planning

AIG STANDARDS: AIG Quality Standards for Investigations - Qualitative
IIA STANDARDS: N/A
PARISH ORDINANCE: JPCO §2-155.10
STATE LAW: N/A

I. INTRODUCTION

OIG investigative work should be adequately planned.⁹²

II. PURPOSE

The purpose of this section is to establish policies and procedures for planning an investigation.

III. SCOPE

This policy applies to JPOIG staff performing investigative functions.

IV. POLICY

- A. The JPOIG investigations will be adequately planned. Effective planning provides the basis for prioritizing investigations and clearly identifying issues to be investigated.
- B. Planning should ensure that investigative objectives will be met within anticipated time constraints of the assignment. Planning should help clarify investigative issues to be addressed in advance of initiating the investigation and includes preparing a written investigative plan.
- C. A written “Investigative Plan” should be completed for all investigations and should contain the following information:
 1. Case number;
 2. Date assigned and Case Agent;
 3. Brief description of the complaint, allegation, violation or issue;
 4. Objectives of the investigation;
 5. References to relevant statutes, ordinances or policies;
 6. Preliminary investigative steps;
 7. Time needed for completing preliminary investigative steps and anticipated time for completion of investigation;
 8. Outline of anticipated investigative techniques; and
 9. Approval by Deputy Inspector General – Investigations.

⁹² AIG Quality Standards for Investigations, Qualitative Standards, Subparagraph B.

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- D. The JPOIG staff will keep the supervising Deputy Inspector General informed of material and necessary changes to the “Investigative Plan.” Material and necessary changes to an approved “Investigative Plan” will be made through submission of an “Amended Investigative Plan.”
 - E. An approved “Investigative Plan” does not negate the need for approval to engage in specific investigative techniques which may be the subject of separate JPOIG Policies and Procedures or Investigations Standard Operating Procedures.
- V. PROCEDURE
- A. The JPOIG staff are to submit to the supervising Deputy Inspector General for approval a written “Investigative Plan” no later than ten days from the date the case has been assigned unless otherwise directed.
 - B. The JPOIG staff are not to act upon an “Investigative Plan” until such time as the supervising Deputy Inspector General has approved the plan or the staff member receives specific written direction to the contrary.
 - C. The JPOIG staff are to submit to the supervising Deputy Inspector General for approval an updated “Amended Investigative Plan,” as needed, prior to engagement of planned investigative activity.
 - D. The JPOIG staff are to conduct investigations according to an approved Investigative Plan, recognizing that the Investigative Plan may be modified to meet new or changing objectives or to recognize unanticipated developments.
 - E. The JPOIG staff are to conclude investigations within 180 days from the date of assignment absent an extension of time approved by the Deputy Inspector General – Investigations.
 - F. Extensions of time within which to complete an investigation is to be approved by the supervising Deputy Inspector General on a case-by-case basis and is to be documented in the case file.
 - G. Planned investigative activity, including any extensions of time, is to be documented in the JPOIG Case management system.

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Chapter 3 – Quality Standards for Inspector General Investigations Section: 3-2 Qualitative Standards

Subsection: 3 Data Collection and Analysis

AIG STANDARDS: AIG Quality Standards for Investigations - Qualitative
IIA STANDARDS: N/A
PARISH ORDINANCE: JPCO §2-155.10(12)&(18)
STATE LAW: N/A

I. INTRODUCTION

Information and data gathered during an OIG investigation should be carefully documented and organized relative to case objectives.⁹³

II. PURPOSE

The purpose of this section is to establish policies and procedures which ensure that information and data gathered during an investigation is documented and organized relative to case objectives.

III. SCOPE

This policy applies to the JPOIG staff performing investigations.

IV. POLICY

- A. Appropriate investigative techniques should be chosen and employed to ensure that the data gathered is sufficiently reliable for making judgments regarding the matters being investigated.
- B. Sources of investigative information should be documented in sufficient detail to provide a basis for assessing its reliability. Such documentation should address pertinent questions related to the objectives of the investigation and provide information needed to determine the facts relative to potential violations of laws, rules, regulations, policies and procedures.
- C. Data gathered and analyzed as part of the investigation should be accurately interpreted, logically presented and maintained in the investigative case file. The basis and support for the results of investigations should be carefully organized and described in the investigative case file.

V. PROCEDURE

- A. The JPOIG staff will plan and utilize appropriate investigative techniques which may include but are not limited to:
 - 1. Accessing records, information, data, reports, plans, projections, contracts, memoranda, correspondence, audit, reviews, papers, books, documents,

⁹³ AIG Quality Standards for Investigations, Qualitative Standards, Subparagraph C.

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- computer hard drives, e-mails, instant messages, recommendations and other relevant material to an investigation;
2. Issuing request or subpoena for records, as needed, for records, information, data, reports, plans, projections, contracts, memoranda, correspondence, audit, reviews, papers, books, documents, e-mails, instant messages, recommendations and other relevant material to an investigation;
 3. Obtaining sworn and un-sworn written statements; and
 4. Conducting interviews.
- B. The JPOIG staff will document source of investigative information in sufficient detail to provide a basis for assessing its reliability, to include but not be limited to:
1. Means and method of gathering and preserving integrity of data, including any required consent, approvals or receipts;
 2. Time, date and place data was gathered, unless otherwise identifiable;
 3. Person or entity from whom data was gathered, when necessary;
 4. Potential value and relevance to investigation, as appropriate.
- C. The JPOIG staff will gather, maintain and organize data within investigative file in a logical manner which supports efficient and effective access and analysis to include by way of example:
1. Segregating or identifying data within investigative file by subject matter, date or other identifying feature;
 2. Segregating data by relevance to final report; and
 3. Rendering data searchable.

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Inspector General

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Chapter 3 – Quality Standards for Inspector General Investigations Section: 3-2 Qualitative Standards Subsection: 4 Interviews and Statements

AIG STANDARDS: AIG Quality Standards for Investigations - Qualitative
IIA STANDARDS: N/A
PARISH ORDINANCE: JPCO §2-155.10
STATE LAW: N/A

I. INTRODUCTION

Information and data gathered during an OIG investigation should be carefully documented and organized relative to case objectives.⁹⁴

II. PURPOSE

The purpose of this section is to establish policies and procedures which provide for gathering data and information through interviews and statements.

III. SCOPE

This policy applies to JPOIG staff performing investigations.

IV. POLICY

- A. The JPOIG recognizes that interviews are an important investigative technique and the preferred method for obtaining statements. Interviews with complainants, witnesses and subjects should be part of the JPOIG investigative plan, where appropriate.
- B. The JPOIG interviews will be properly conducted and documented. All interviews are subject to inclusion in reports.
- C. The JPOIG staff may, at its discretion, accept sworn and unsworn statements in lieu of or in addition to interviews.

V. PROCEDURE

A. Interviews

- 1. The JPOIG interviews will be planned whenever feasible. Prior to scheduling an interview, the JPOIG staff will spend adequate time researching facts, gathering pertinent data, reviewing pertinent data, assessing relationship of interviewee to investigation, and preparing written questions.
- 2. The JPOIG staff will conduct interviews in private. No one other than the JPOIG staff and the person being interviewed are allowed to participate or be present.

⁹⁴ AIG Quality Standards for Investigations, Qualitative Standards, Subparagraph C.

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3. The JPOIG staff should schedule interviews to take place at the JPOIG office, and interviews should be recorded. Recordings of interviews will be maintained in the case file.
4. The JPOIG staff may take interviews under oath, but it is not required of every interview.
5. The JPOIG staff will maintain any contemporaneous interview notes in the case file.
6. The JPOIG staff will give appropriate warnings to those individuals suspected of violating a law or regulation.
7. The JPOIG staff will document investigative activity related to interviews in the case file.

B. Written Statements

1. The JPOIG staff may, under certain circumstances, accept a written statement in lieu of an interview or in addition to an interview.
2. Written statements should be taken under oath and with counsel of Legal.

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Chapter 3 – Quality Standards for Inspector General Investigations Section: 3-2 Qualitative Standards

Subsection: 5 Evidence - Case Supporting Material

AIG STANDARDS: AIG Quality Standards for Investigations - Qualitative
IIA STANDARDS: N/A
PARISH ORDINANCE: JPCO §2-155.10
STATE LAW: N/A

I. INTRODUCTION

Sufficient, competent, and relevant evidence is to be obtained to afford a reasonable basis for investigative findings and conclusions.⁹⁵

II. PURPOSE

The purpose of this section is to establish policies and procedures which ensure that evidence and case materials are sufficient, competent and relevant to reported findings and conclusions.

III. SCOPE

This policy applies to the JPOIG staff performing investigations.

IV. POLICY

A. “Evidence” is understood to be any form of proof or probative matter collected during an investigation, including but not limited to physical property, electronic storage mediums, original documents, original photographs, audio and electronic recordings and statements in any form, which may be relied upon to support an investigative administrative or criminal action. Evidence is maintained in the JPOIG Evidence Room.

B. “Case supporting materials” are materials gathered to support findings and conclusions. Case supporting materials include any evidence collected during an investigation as well as any copies of documents which afford a reasonable basis for investigative findings and conclusions. Case supporting materials, other than evidence, will be maintained with the case file.

C. The JPOIG investigative findings and conclusions will be supported by adequate quantity and quality of evidence and case supporting materials which are competent, to the extent that they are consistent with facts, and relevant, in that there is a logical relationship to findings.

V. PROCEDURE

A. The JPOIG staff will document, and segregate where appropriate, case materials and evidence which support findings and conclusions.

⁹⁵ AIG Quality Standards for Investigations, Qualitative Standards, Subparagraph D.

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- B. JPOIG staff will review case supporting materials and evidence prior to rendering a report for the purpose of verifying that there is sufficient, competent and relevant evidence to support findings and conclusions.
- C. JPOIG staff will document the review and present proposed findings and conclusions to the supervising Deputy Inspector General for consideration and approval.
- D. The supervising Deputy Inspector General will review the case supporting materials and evidence in each investigation to ensure that it is sufficient, competent and relevant before approving findings and conclusions.
- E. JPOIG staff will report upon case materials and evidence that support findings and conclusions in accordance with Section 3-7 of the JPOIG Policies and Procedures.

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Chapter 3 – Quality Standards for Inspector General Investigations

Section: 3-2 Qualitative Standards

Subsection: 6 Timeliness

AIG STANDARDS: AIG Quality Standards for Investigations - Qualitative
IIA STANDARDS: N/A
PARISH ORDINANCE: JPCO §2-155.10
STATE LAW: N/A

I. INTRODUCTION

OIG investigations should be conducted in a timely manner.⁹⁶

II. PURPOSE

The purpose of this section is to establish policies and procedures which ensure that investigations are conducted in a timely manner.

III. SCOPE

This policy applies to the JPOIG staff performing investigations.

IV. POLICY

A. The JPOIG recognizes that the timeliness of investigations is often relevant to their value. The JPOIG investigations should be conducted and concluded in a timely manner.

B. Investigations necessarily require flexibility to adjust to changing priorities or unforeseen circumstances, such as the need to expand the scope of an investigation or respond to an emergent need caused by other events. Timeliness of an investigation will be assessed against complexity of investigation and availability of resources.

V. PROCEDURE

A. The JPOIG staff should conclude investigations within 180 days from the date of assignment in accordance with recognition that investigations differ in scope and complexity. Requests for extensions of time are to be submitted via an “Amended Investigative Plan” including a justification for the additional time requested.

⁹⁶ AIG Quality Standards for Investigations, Qualitative Standards, Subparagraph E.

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- B. The supervising Deputy Inspector General will conduct progress reviews to verify that investigations are progressing in an efficient, effective, and thorough manner to ensure timeliness.

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Chapter 3 – Quality Standards for Inspector General Investigations Section: 3-2 Qualitative Standards Subsection: 7 Reporting and Follow-Up

AIG STANDARDS: AIG Quality Standards for Investigations - Qualitative
IIA STANDARDS: N/A
PARISH ORDINANCE: JPCO §2-155.10
STATE LAW: N/A

I. INTRODUCTION

OIG investigative activity should result in a timely referral or written report. All reports shall present factual data accurately, fairly, and objectively, and present the results of investigation in a persuasive manner.⁹⁷ Appropriate follow-up to administrative or systematic issues identified by investigators should be performed to assure that any recommendations made to appropriate officials are adequately considered and properly addressed.⁹⁸

II. PURPOSE

The purpose of this section is to establish policies and procedures that provide for timely reporting and follow-up of investigative activity.

III. SCOPE

This policy applies to JPOIG staff performing investigations.

IV. POLICY

- A. Investigative reports will comply with Section 2-7 of the JPOIG Policies and Procedures.
- B. Investigative report language should be clear and concise and written in terms that are intelligible to informed professionals, recognizing that some assignments deal with technical, complex or sensitive material.
- C. Investigative reports should be adequately supported by facts which are presented in a straightforward manner and without the use of unnecessary, obscure, or confusing verbiage.
- D. The JPOIG staff should take necessary steps to determine whether appropriate officials and responsible persons have taken timely, complete and reasonable actions to correct problems identified in investigative reports. Ultimate investigative success depends on whether necessary corrective actions are taken.

⁹⁷ AIG Quality Standards for Investigations, Qualitative Standards, Subparagraph F.

⁹⁸ AIG Quality Standards for Investigations, Qualitative Standards, Subparagraph H.

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V. PROCEDURE

- A. The JPOIG staff will prepare draft reports to include the following sections:
1. Introduction: this section should outline the investigation and contain a statement of JPOIG jurisdiction as well as impetus for investigation whether it be anonymous tip, complaint, referral, etc.
 2. Scope: this section should set out scope of investigation and relevant timeframe.
 3. Background: this section should set forth facts and context necessary for reader to understand findings and conclusions. Facts should be supported by evidence and case supporting material which are referenced in footnotes.
 4. Findings: this section sets forth findings which are supported by facts and should be categorized, where appropriate, by fraud, waste or abuse.
 5. Conclusion: this section sets forth conclusions which are supported by findings and any recommendations for corrective action to prevent future fraud, waste or abuse.
- B. The JPOIG staff will apply principles of good report writing when writing investigative reports.
- C. The JPOIG staff will follow-up on reports which include findings and recommendations related to systemic weakness or patterns of conduct which leave government vulnerable to fraud, waste and abuse for re-assessment and subsequent report, if appropriate, within 18 months of the original report becoming final.

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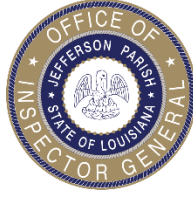


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Chapter 4 – Quality Standards for Audit

Chapter 4 identifies the audit standard(s) adopted by JPOIG. The AIG recommends that OIG’s adopt independent national standards. Unless otherwise indicated, the JPOIG has adopted the International Professional Practices Framework (IPPF) promulgated by the Institute of Internal Audits (IIA). This chapter establishes policies and procedures to ensure these standards are met where applicable.



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Chapter 4 – Quality Standards for Audit Section: 4-1 General Standards

AIG STANDARDS:	AIG Quality Standards for Audits
IIA STANDARDS:	1000 Purpose, Authority and Responsibility
PARISH ORDINANCE:	JPCO §2-155.10(13)
STATE LAW:	N/A

I. INTRODUCTION

Audits performed by an OIG should be done in accordance with generally accepted auditing standards. Each OIG should adopt and follow audit standards appropriate to the OIG's mission and authority.⁹⁹

II. PURPOSE

The purpose of this section is to set general policies and procedures which provide guidance for all JPOIG audit.

III. SCOPE

This policy applies to all JPOIG staff performing audits.

IV. POLICY

A. The JPOIG adopts the Standards for the Professional Practice of Internal Auditing issued by the Institute of Internal Auditors (IIA). The IIA Standards are divided into two elements: the attribute standards and performance standards.

1. Attribute standards represent general standards by which the audit function operates and are referenced below:
 - ✓ 1000 Purpose, Authority and Responsibility
 - ✓ 1100 Independence and Objectivity
 - ✓ 1200 Proficiency and Due Professional Care
 - ✓ 1300 Quality Assurance and Improvement Program
2. Performance standards are those standards associated with IIA compliant audits and are referenced below:
 - ✓ 2000 Managing the Audit Activity
 - ✓ 2100 Nature of the (Audit) Work
 - ✓ 2200 Engagement (Audit) Planning
 - ✓ 2300 Performing the Engagement (Audit)
 - ✓ 2400 Communicating Results
 - ✓ 2500 Monitoring Progress
 - ✓ 2600 Management Acceptance of Risks

⁹⁹ AIG Quality Standards for Audit. JPOIG has adopted Internal Professional Practice Framework (IPPF) promulgated by the Institute of Internal Auditors.

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- B. The JPOIG staff will perform both compliant and non-compliant audits due to the unique nature of JPOIG operations, mission and resources.

V. PROCEDURE

- A. Audits may be conducted in compliance with the IPPF, both Attribute and Performance standards. Audits may also be conducted utilizing the IPPF Attributes and Performance standards, in part but not in whole. Audit reports will identify whether it meets IPPF standards in full or in part.
- B. All audits will be conducted in compliance with JPOIG policies and procedures applicable to all JPOIG staff, including Section 1-1, *Statement of Principles*, which encompasses or exceeds the IIA Code of Ethics. For this reason, the IIA Code of Ethics is not duplicated in this Chapter.
- C. The JPOIG staff will comply with the JPOIG Audit Division Standard Operating Policies, as applicable, when engaging in audit activity.

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Chapter 4 – Quality Standards for Audit Section: 4-2 Independence and Objectivity

AIG STANDARDS:	AIG Quality Standards for Audits
IIA STANDARDS:	1100 Independence and Objectivity
PARISH ORDINANCE:	JPCO §2-155.10(13)
STATE LAW:	N/A

I. INTRODUCTION

Audits performed by an OIG should be done in accordance with generally accepted auditing standards. Each OIG should adopt and follow audit standards appropriate to the OIG's mission and authority.¹⁰⁰

II. PURPOSE

The purpose of this policy is to identify criteria to ensure independence and objectivity.

III. SCOPE

This policy applies to all JPOIG staff performing audits.

IV. POLICY

The JPOIG staff shall have a process by which it ensures all audits are conducted with the appropriate independence and objectivity.¹⁰¹

V. PROCEDURE

A. Independence

1. The JPOIG staff are to maintain an independent mental attitude free of partiality or bias when performing audits and are not to subordinate their judgment on audit matters to others.

B. Objectivity

1. Audit methods and procedures should be designed to foster objectivity.
2. Auditors are not to be placed in situations in which they feel unable to make objective professional judgments.

C. Compliance

Staff assignments are made so that potential and actual conflicts of interest and bias are avoided as follows:

1. The JPOIG staff are expected to report conflict of interest situations to the supervising Deputy Inspector General or the Inspector General.

¹⁰⁰ AIG Quality Standards for Audit. JPOIG has adopted Internal Professional Practice Framework (IPPF) promulgated by the Institute of Internal Auditors.

¹⁰¹ See also Chapter 1.6-Independence regarding independence.

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2. The JPOIG staff are required to attest to their independence and objectivity through an affirmative attestation at the inception of an assignment.
3. In the event that circumstances change to present a conflict of interest, the JPOIG staff is required to cease audit activity and advise their supervisor.

D. Supervision

1. Reported conflicts will be assessed and the JPOIG staff will be reassigned as appropriate.
2. The JPOIG staff will not be assigned to audit any activity for which they had authority or responsibility in the prior 24 months.

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Chapter 4 – Quality Standards for Audit Section: 4-3 Due Professional Care

AIG STANDARDS:	AIG Quality Standards for Audits
IIA STANDARDS:	1200 Due Professional Care
PARISH ORDINANCE:	JPCO §2-155.10(13)
STATE LAW:	N/A

I. INTRODUCTION

Audits performed by an OIG should be done in accordance with generally accepted auditing standards. Each OIG should adopt and follow audit standards appropriate to the OIG's mission and authority.¹⁰²

II. PURPOSE

The purpose of this section is to identify the elements and standards for Due Professional Care as required by the IIA standards.

III. SCOPE

This policy applies to all JPOIG staff performing audits.

IV. POLICY

The purpose of this policy is to identify the requisite care and skill required to perform.

V. PROCEDURE

The following processes will ensure that due professional care is achieved in all IPPF complaint audits:

- A. Reasonable Audit Skill and Judgement- All audits begin using audit planning steps that lead to a clear understanding of the risks, processes and controls in order to determine the appropriate audit scope and objectives.
 1. The planning phase is documented through the use of a planning package which is approved by the supervising Deputy Inspector General, and may be reviewed by the Inspector General, prior to the commencement of the audit.
 2. Fieldwork is planned and testing implementation is supervised to ensure that the objectives of the audit will be met. Regular staff/supervisor communication is conducted to ensure that actual fieldwork practices support the audit scope and objectives.
 3. The JPPOIG staff will give consider the materiality, impact, cause, and effect of control concerns as they emerge during audit fieldwork. Materiality is considered in developing all potential audit findings. The supervising Deputy Inspector General and the Inspector General approves

¹⁰² AIG Quality Standards for Audit. JPOIG has adopted Internal Professional Practice Framework (IPPF) promulgated by the Institute of Internal Auditors.

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the issuance of final findings and recommendations contained in the Confidential Draft Report.

4. Professional care is to be performed in a manner that is appropriate to the complexities of the audit being performed.
- B. Professional Conduct is achieved by compliance with Chapter 1-1.
- C. Due Care is achieved by the following:
1. The JPOIG staff shall be alert to those conditions and activities where irregularities are most likely to occur.
 2. The JPOIG staff are expected to conduct examinations and verifications to a reasonable extent, with an appropriate degree of testing transactions.
 3. The JPOIG staff should determine the appropriate type and degree of interviewing, system review, and testing to provide proper due care.
 4. When the JPOIG staff suspects a criminal act or wrongdoing has occurred, the supervising Deputy Inspector General is notified. The supervising Deputy Inspector General will confer with the Inspector General and others as needed to assess the most effective manner in which to proceed.

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Chapter 4 – Quality Standards for Audit

Section: 4-4 Quality Assurance and Improvement

AIG STANDARDS: AIG Quality Standards for Audits

IIA STANDARDS: 1300 Quality Assurance and Improvement Program

PARISH ORDINANCE: JPCO §2-155.10(13)

STATE LAW: N/A

I. INTRODUCTION

Audits performed by an OIG should be done in accordance with generally accepted auditing standards. Each OIG should adopt and follow audit standards appropriate to the OIG's mission and authority.¹⁰³

II. PURPOSE

The purpose of this section is to identify the elements and standards a quality assurance and improvement program.

III. SCOPE

This policy applies to all JPOIG staff performing audits.

IV. POLICY

- A. The JPOIG staff performing audits will comply with Chapter 2-9 which sets forth the elements of the JPOIG quality assurance standards.
- B. The supervising Deputy Inspector General will establish an annual internal quality review and process improvement program to ensure that applicable standards are followed and compliance is documented.

V. PROCEDURE

- A. Specific information is to be retained in both electronic audit files, and within CMTS in accordance with the established audit protocols. These protocols are described in further detail within this Chapter sections 4-5 through 4-9.
- B. Such reviews are to be performed at least annually, however, more frequent reviews may be performed at the discretion of the supervising Deputy Inspector General.
- C. All JPOIG staff are expected to participate in and provide their full cooperation during the internal quality review process. Internal quality reviews are to be considered similar to an audit project assignment and such assignments will be prioritized accordingly to management direction.
- D. Annual Internal Quality Review-A listing of closed audits will be produced from the automated the JPOIG case management system.

¹⁰³ AIG Quality Standards for Audit. JPOIG has adopted Internal Professional Practice Framework (IPPF) promulgated by the Institute of Internal Auditors.

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1. The supervising Deputy Inspector General will assign each JPOIG staff certain closed audit files to review in accordance with established standards.
 2. The audit files will be used to determine the level of quality achieved for audit files relative to applicable standards.
- E. Annual Quality Report to the Inspector General-supervising Deputy Inspector General will prepare a written report to communicate the results of the internal quality review to the Inspector General.
1. All deficiencies noted will be corrected by the auditor who performed the review after the results have been communicated to the Inspector General.
 2. The JPOIG management may use the results of these internal quality reviews as part of each auditor's annual performance review.
- F. In accordance with Chapter 2-9 Quality Assurance, the JPOIG staff performing audits will undergo an external quality review every 3 calendar years.

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Chapter 4 – Quality Standards for Audit

Section: 4-5 Direction and Control of the Audit Activity

AIG STANDARDS:	AIG Quality Standards for Audits
IIA STANDARDS:	2000 Managing the Audit Activity
PARISH ORDINANCE:	JPCO §2-155.10(13)
STATE LAW:	N/A

I. INTRODUCTION

Audits performed by an OIG should be done in accordance with generally accepted auditing standards. Each OIG should adopt and follow audit standards appropriate to the OIG's mission and authority.¹⁰⁴

II. PURPOSE

The purpose of this section is to establish the requirements for the operational management of the JPOIG staff performing audits.

III. SCOPE

This policy applies to all JPOIG staff performing audits.

IV. POLICY

This policy identifies the standards, procedures, and protocols for the management of all technical and administrative activities.

V. PROCEDURE

- A. The supervising Deputy Inspector General is responsible for the following management activities which include but are not limited to the following:
1. Developing, coordinating, directing, and executing a comprehensive audit program for the evaluation of the management controls provided over all Parish activities.
 2. Preparing and presenting the annual risk assessment and annual audit plan.
 3. Managing the day to day operations of the audit function, including but not limited to the following:
 - a. Assigning audits to be performed and related deadlines for the completion of same.
 - b. Participating in periodic status meetings for all ongoing work.
 - c. Approving all audit planning packages
 - d. Reviewing and approving all workpapers, testing summaries and audit evidence contained in the electronic audit files.
 - e. Reviewing, approving, and issuing all Confidential Draft, Confidential Final and Public Audit reports.

¹⁰⁴ AIG Quality Standards for Audit. JPOIG has adopted Internal Professional Practice Framework (IPPF) promulgated by the Institute of Internal Auditors.

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- B. The supervising Deputy Inspector General will provide periodic reports to the Inspector General as required, such as:
1. Audit Work Plans
 2. Audit Coverage and Results
 3. Audit Resource Hours Used
 4. Audit Division Personnel
 5. Audit Division Administration

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Chapter 4 – Quality Standards for Audit Section: 4-6 Audit Project Management

AIG STANDARDS: AIG Quality Standards for Audits
IIA STANDARDS: 2100: Nature of the Work
PARISH ORDINANCE: JPCO §2-155.10(13)
STATE LAW: N/A

I. INTRODUCTION

Audits performed by an OIG should be done in accordance with generally accepted auditing standards. Each OIG should adopt and follow audit standards appropriate to the OIG's mission and authority.¹⁰⁵

II. PURPOSE

The purpose of this section is to establish the requirements for the management of all audit projects undertaken by the JPOIG.

III. SCOPE

This policy applies to all JPOIG staff performing audits.

IV. POLICY

The JPOIG has selected and implemented a Case Management System (CMTS) which is used to track and report on the progress of all audit cases.

V. PROCEDURE

- A. The CMTS will be the document repository for all audits and serve as the controlling system where key documents are maintained that identify each phase of the audit as it is completed. The audit phases are: planning, fieldwork, reporting and follow-up.
- B. The JPOIG staff are required to document the completion of each phase of the audit process by uploading key documents into the CMTS. Examples of documents to support an audit include but are not limited to the following:
 1. Approved planning package
 2. Draft confidential report
 3. Final report
 4. Public report
 5. Follow up report
 6. Case Closure Checklist

¹⁰⁵ AIG Quality Standards for Audit. JPOIG has adopted International Professional Practice Framework (IPPF) promulgated by the Institute of Internal Auditors (IIA).

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- C. The JPOIG staff are required to maintain any additional or supplemental documentation and work papers obtained or generated during the course of the audit activity in the designated electronic or paper file during the audit and upon its closure.

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Chapter 4 – Quality Standards for Audit

Section: 4-7 Audit Engagement and Planning

AIG STANDARDS:	AIG Quality Standards for Audits
IIA STANDARDS:	2200 Audit Engagement Planning
PARISH ORDINANCE:	JPCO §2-155.10(13)
STATE LAW:	N/A

I. INTRODUCTION

Audits performed by an OIG should be done in accordance with generally accepted auditing standards. Each OIG should adopt and follow audit standards appropriate to the OIG's mission and authority.¹⁰⁶

II. PURPOSE

The purpose of this section is to identify elements for the audit engagement planning.

III. SCOPE

This policy applies to all JPOIG staff performing audits.

IV. POLICY

- A. All audits will be performed in accordance with an audit plan, referred to as the "Audit planning package." The purpose of the audit plan is to assemble the information needed to determine the audit objective, scope, major areas to be included, and specific testing steps to be performed.
- B. The potential for fraud, waste or abuse will be considered when preparing the "Audit planning package."
- C. The standard "Audit planning package" will include the following deliverables:
 - 1. Flowcharts for all key process that depict key processes, controls, and documents.
 - 2. A planning memo that summarizes the audit scope and objectives to be performed, and it outlines any key concerns or allegations made regarding management practices or operational results.
 - 3. An audit program that links risks, processes, controls and testing steps that are to be used to evaluate transactions, books, records or operations.

V. PROCEDURE

- A. The JPOIG staff will obtain a general working knowledge, that can be utilized to develop an audit plan. A working knowledge will, at a minimum, include but not be limited to an understanding of processes to be tested, key laws and regulations involved, the organizational background.

¹⁰⁶ AIG Quality Standards for Audit. JPOIG has adopted Internal Professional Practice Framework (IPPF) promulgated by the Institute of Internal Auditors.

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- B. The JPOIG staff will submit a completed planning package, to include where applicable, the flowcharts, planning memo and audit program, to the supervising Deputy Inspector General for approval.
- C. The supervising Deputy Inspector General will review the planning package for review, comment, amendment, and/or approval.
- D. The supervising Deputy Inspector General will present an approved audit planning package to the Inspector General for review, comment, amendment and/or approval.
- E. After the audit planning package has received and approved by the supervising Deputy Inspector General, the JPOIG staff will upload the audit planning package into the Case Management System (CMTS). The Inspector General may review and approve the planning package before it is uploaded to CMTS. This completes the planning phase.

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Chapter 4 – Quality Standards for Audit

Section: 4-8 Performing the Audit Engagement

AIG STANDARDS: AIG Quality Standards for Audits

IIA STANDARDS: 2300: Performing the Audit Engagement

PARISH ORDINANCE: JPCO §2-155.10(13)

STATE LAW: N/A

I. INTRODUCTION

Audits performed by an OIG should be done in accordance with generally accepted auditing standards. Each OIG should adopt and follow audit standards appropriate to the OIG's mission and authority.¹⁰⁷

II. PURPOSE

The purpose of this section is to identify elements for performing the audit engagement, fieldwork.

III. SCOPE

This policy applies to all JPOIG staff performing audits.

IV. POLICY

A. Fieldwork will be performed in accordance with the audit plan and to achieve the audit objectives.

B. Findings will be supported by field work sufficient to allow a third party to arrive at the same or similar conclusion as the auditor.

C. Fieldwork is concluded when audit testing programs with auditor's initials and date the testing was performed, and the electronic file reference for supporting evidence or workpaper summaries is completed.

V. PROCEDURE

A. The JPOIG staff will document fieldwork in work papers.

B. Fieldwork may include, but is not limited to, interviews, observations, document review, and analysis sufficient to arrive at a specific conclusion relating to the audit objectives identified in the audit planning package.

C. The fieldwork phase of an audit includes the identification and development of issues or findings, and the written documentation that will become the basis for the confidential draft report. All potential findings should be supported by

¹⁰⁷ AIG Quality Standards for Audit. JPOIG has adopted Internal Professional Practice Framework (IPPF) promulgated by the Institute of Internal Auditors.

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conclusions in the testing work papers that will allow any third party to arrive at the same conclusions as the auditor.

- D. The JPOIG staff will notify the supervising Deputy Inspector General that the electronic file is ready for detailed review.
- E. The supervising Deputy Inspector General reviews the work performed, makes any edits or comments necessary, and closes the fieldwork phase of the review.

APPROVED BY:



Kim Raines Chatelain
Inspector General

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Chapter 4 – Quality Standards for Audit Section: 4-9 Communicating Results

AIG STANDARDS: AIG Quality Standards for Audits
IIA STANDARDS: 2400: Communicating Results
PARISH ORDINANCE: JPCO §2-155.10(13)
STATE LAW: N/A

I. INTRODUCTION

Audits performed by an OIG should be done in accordance with generally accepted auditing standards. Each OIG should adopt and follow audit standards appropriate to the OIG's mission and authority.¹⁰⁸

II. PURPOSE

The purpose of this section is to identify policy and procedure for communicating the results of all audits undertaken by the JPOIG.

III. SCOPE

This policy applies to all JPOIG Audit Division staff.

IV. POLICY

Audit reports will be prepared and published in accordance with Section 2-7, Reporting, Subsection 2, Final Reports.

V. PROCEDURE

The JPOIG staff will communicate results by preparing and publishing reports in accordance with Section 207, Reporting, Subsection 2, Final Reports.

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Kim Raines Chatelain
Inspector General

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¹⁰⁸ AIG Quality Standards for Audit. JPOIG has adopted International Professional Practices Framework (IPPF) promulgated by the Institute of Internal Auditors (IIA).



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Chapter 5 – Quality Standards for Inspections, Evaluations and Reviews

Chapter 5 identifies the quality standards established by the Association of Inspectors General for inspections, evaluations and reviews. The JPOIG adopts these quality standards. The sections in this chapter establishes policies and procedures to ensure these quality standards are met. These policies and procedures address planning, conducting, and documenting inspections, evaluations and reviews as well as gathering and preserving supporting materials and reporting of results and conclusions.

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Chapter 5 – Quality Standards for Inspector General Inspections, Evaluations and Reviews

Section: 5-1 General Standards

Subsection: 1 Compliance with Principles and Standards for Offices of Inspectors General

AIG STANDARDS: AIG Quality Standards for Inspections, Evaluations and Reviews - General

IIA STANDARDS: N/A

PARISH ORDINANCE: JPCO §2-155(13)

STATE LAW: N/A

I. INTRODUCTION

Standards for initiating and conducting inspections, evaluations and reviews by the JPOIG will conform to the Principles and Standards for the Offices of Inspectors General, Association of Inspector General.¹⁰⁹

II. PURPOSE

The purpose of this section is to establish policies and procedures for conducting inspections, evaluations and reviews in a manner compliant with the Principles and Standards for the Offices of Inspectors General, Association of Inspectors General.

III. SCOPE

This policy applies to JPOIG staff performing inspections, evaluations and reviews functions

IV. POLICY

A. It is the policy of the JPOIG that standards for initiating and conducting inspections, evaluations and reviews by the JPOIG will conform to the General Standards identified by the Principles and Standards for the Offices of Inspectors General, Association of Inspectors which are as follows:

1. Staff qualifications: individuals assigned to conduct inspections, evaluations and reviews activities possess needed knowledge, skills and experience.
2. Independence: JPOIG staff assigned to inspections, evaluations and reviews are free from personal or external impairments.
3. Due professional care: Due professional care should be used in conducting inspections, evaluations and reviews and in preparing accompanying reports.

B. It is the policy of the JPOIG that standards for initiating and conducting inspections, evaluations and reviews by the JPOIG will conform to the Qualitative

¹⁰⁹ AIG Quality Standards for Inspections, Evaluations and Reviews by Office of Inspector General.

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Standards identified by the Principles and Standards for the Offices of Inspectors General, Association of Inspectors General which are as follows:

1. Quality control
2. Planning
3. Data collection and analysis
4. Evidence
5. Timeliness
6. Reporting
7. Confidentiality
8. Follow-up

V. PROCEDURE

- A. The JPOIG staff are to initiate and conduct evaluations, inspections and reviews in a manner consistent with the Principles and Standards for the Offices of Inspectors General, Association of Inspectors General as set forth in this Manual of Policies and Procedures and any Inspections, Evaluations and Reviews Standard Operating Procedures.
- B. The JPOIG staff are to plan and execute inspections, evaluations, and reviews for the purpose of:
1. Identifying and documenting sufficient factual information and evidence to meet objectives of inspection, evaluation or review.
 2. Reporting accurately and ensuring that findings are appropriately supported.
 3. Supporting and tracking corrective actions taken as a result of findings and efforts.
- C. Inspection, Evaluation and Review activity and actions in the areas of planning, data collection, maintaining confidentiality, timeliness and reporting are to be documented in a case management system.

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Chapter 5 – Quality Standards for Inspector General Inspections, Evaluations and Reviews

Section: 5-2 General Standards

Subsection: 2 Staff Qualifications

AIG STANDARDS: AIG Quality Standards for Inspections, Evaluations and Reviews – Staff

IIA STANDARDS: N/A

PARISH ORDINANCE: N/A

STATE LAW: N/A

I. INTRODUCTION

Individuals assigned to conduct inspection, evaluation and review activities should collectively possess the knowledge, skills, and experience required for the work.¹¹⁰

II. PURPOSE

The purpose of this section is to establish policies and procedures to ensure individuals assigned to conduct inspection, evaluation and review activities collectively possess the knowledge, skills and abilities required to perform the work.

III. SCOPE

This policy applies to JPOIG staff performing inspection, evaluation and review functions.

IV. POLICY

- A. The General Standard of Staff Qualifications contained in the Quality Standards for Offices of Inspectors General shall apply to inspections, evaluations and reviews performed by the JPOIG staff.
- B. The supervising Deputy Inspector General is responsible for ensuring that the JPOIG staff collectively possess the necessary skills to conduct an inspection, evaluation or review. At a minimum, these skills include:
1. Familiarity with Jefferson Parish government and its functions, activities, projects, programs, records, contacts, policies and procedures.
 2. Prior experience with measuring performance, assessing efficiency and effectiveness of operations, monitoring compliance and providing a source of factual and analytical information.
 3. Educational background in the subject area being reviewed and/or generally with respect to inspections, evaluations and reviews.
 4. Ability to conduct preliminary research necessary to carry out the types of inspections, evaluations and reviews conducted by the JPOIG.

¹¹⁰ AIG Quality Standards for Inspections, Evaluations and Reviews for Office of Inspector General, General Standards, Subparagraph A.

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5. Working knowledge of government operations and functions; public contracts and procurement; and legislative process.
6. Specialized or technical skills depending on the subject matter being inspected, evaluated or reviewed.

V. PROCEDURE

- A. The General Standard for staff qualifications contained in the Quality Standards for Offices of Inspectors General set out in Section 2-4 shall apply to inspections, evaluations and reviews performed by the JPOIG staff. The supervising Deputy Inspector General will ensure that inspection, evaluation and review team members possess qualifications contained in the Quality Standards for Offices of Inspector General set out in Section 2-4.
- B. The supervising Deputy Inspector General will annually assess and evaluate the JPOIG staff under this policy to determine whether staff individually and collectively possesses the below qualifications:
 1. Familiarity with Jefferson Parish government and its functions, activities, projects, programs, records, contacts, policies and procedures.
 2. Prior experience with measuring performance, assessing efficiency and effectiveness of operations, monitoring compliance and providing a source of factual and analytical information.
 3. Educational background in the subject area being reviewed and/or generally with respect to inspections, evaluations and reviews.
 4. Ability to conduct preliminary research necessary to carry out the types of inspections, evaluations and reviews conducted by the JPOIG.
 5. Working knowledge of government operations and functions; public contracts and procurement; and legislative process.
 6. Specialized or technical skills depending on the subject matter being inspected, evaluated or reviewed.
- C. A written report will be prepared by supervising Deputy Inspector General on the 31st of January with the results of the evaluation and assessment of staff performing inspections, evaluations and reviews.

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Chapter 5 – Quality Standards for Inspector General Inspections, Evaluations and Reviews

Section: 5-1 General Standards

Subsection: 3 Independence

AIG STANDARDS: AIG Quality Standards for Inspections, Evaluations and Reviews - General

IIA STANDARDS: N/A

PARISH ORDINANCE: JPCO §2-155.10

STATE LAW: N/A

I. INTRODUCTION

An OIG involved in performing or supervising any inspection, evaluation or review assignment must be free from personal or external impairments to independence and should constantly maintain an independent attitude and appearance.¹¹¹

II. PURPOSE

The purpose of this section is to establish policies and procedures to ensure that staff conducting inspections, evaluations and reviews are free from personal or external impairments to independence.

III. SCOPE

This policy applies to JPOIG staff performing inspections, evaluations and reviews functions.

IV. POLICY

- A. The JPOIG staff will comply with the General Standard of Staff Qualifications contained in the Quality Standards for Offices of Inspector General.¹¹²
- B. The JPOIG staff are to maintain independence in all matters under review. The JPOIG staff will maintain a mental attitude free of partiality or bias and be free of any conflicts of interest.
- C. The JPOIG staff should not to be placed in situations where they are unable to make objective, professional judgments

V. PROCEDURE

- A. The JPOIG staff will comply with the General Standard of Independence contained in the Quality Standards for Offices of Inspector General set out in Section 2-1, Independence from Personal and External Impairments.

¹¹¹ AIG Quality Standards for Inspections, Evaluations and Reviews for Office of Inspector General, General Standards, Subparagraph B

¹¹² The elements of independence as they pertain to the JPOIG foundation are set forth in Chapter 1.6 Independence.

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- B. The JPOIG staff will attest to and document their independence on each assignment, intake or case through the case management system.
- C. The JPOIG staff will promptly document any conflict of interest which may arise through the case management system and report the conflict of interest situations to the Inspector General or the 1st Assistant Inspector General, in accordance with Section 2-1, *Independence from Personal and External Impairments*.
- D. Reported conflicts will be assessed, and case agents will be reassigned as appropriate.

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Chapter 5 – Quality Standards for Inspector General Inspections, Evaluations and Reviews

Section: 5-1 General Standards

Subsection: 4 Due Professional Care

AIG STANDARDS: AIG Quality Standards for Inspections, Evaluations and Reviews – General

IIA STANDARDS: N/A

PARISH ORDINANCE: JPCO §2-155.10

STATE LAW: N/A

I. INTRODUCTION

OIG staff should exercise due professional care in performing inspections, evaluations and reviews and in preparing accompanying reports.¹¹³

II. PURPOSE

The purpose of this section is to establish policies and procedures to ensure that staff exercise due professional care when conducting inspections, evaluations and reviews and preparing reports.

III. SCOPE

This policy applies to the JPOIG staff performing inspection, evaluation and review functions.

IV. POLICY

A. Exercising due professional care means using good judgment in choosing inspection, evaluation and review subjects and methodology as well as creating accurate and complete inspection, evaluation and review documentation and reports.¹¹⁴

B. Due professional care presumes a working knowledge consistent with inspection, evaluation and review objectives.

C. JPOIG inspections, evaluations and reviews will be conducted with due professional care under the following basic tenets:

1. Standards -- JPOIG staff should follow AIG professional standards and comply with applicable standards of conduct. If issues of possible illegal behavior arise, the JPOIG staff should promptly present such information to their supervisors for review and possible referral to the appropriate investigative office.

¹¹³ AIG Quality Standards for Inspections, Evaluations and Reviews for Office of Inspector General, General Standards, Subparagraph C.

¹¹⁴ AIG Quality Standards for Inspections, Evaluations and Reviews for Office of Inspector General, General Standards, Subparagraph C.

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2. Thoroughness – JPOIG inspections, evaluations and reviews should be conducted in a diligent and complete manner; and reasonable steps will be taken to ensure that sufficient relevant evidence is collected; pertinent issues are sufficiently resolved; and appropriate civil, contractual, or administrative remedies are considered.
3. Legal requirements – JPOIG inspections, evaluations and reviews should be initiated, conducted, and reported in accordance with all applicable laws, rules, and regulations. Inspections, evaluations and reviews will be conducted with due respect for rights and privacy of those involved.
4. Appropriate techniques – Methods and techniques used in each inspections, evaluations and reviews should be appropriate for the circumstances and objectives.
5. Objectivity – Evidence should be gathered and reported in a fair, unbiased and independent manner to convince the report user of the validity of the conclusions and recommendations made during the inspection, evaluation or review.
6. Ethics – At all times, the actions of the JPOIG staff should conform to the high standards.
7. Timeliness – JPOIG inspections, evaluations and reviews should be conducted and reported in a timely manner while recognizing the individual complexities case or project situation.
8. Accurate and Complete Documentation – Report findings, conclusions, and recommendations should be supported by adequate documentation.
9. Coordination – Appropriate JPOIG staff should coordinate the results of the inspection, evaluation or review with appropriate officials.¹¹⁵

V. PROCEDURE

A. Thoroughness and Documentation

JPOIG staff will document actions and activity taken in the course of an inspection, evaluation and review as well as compliance with applicable professional standards in the case management system.

B. Legal Requirements and Appropriate Techniques

1. JPOIG staff will anticipate and incorporate appropriate techniques into the planning process;
2. JPOIG staff will consult legal counsel, as appropriate.
3. JPOIG staff will employ the methods most appropriate for the object of study. They may rely on the work of others to the extent feasible once they satisfy themselves of the quality of the work by the appropriate tests or by other acceptable means.

¹¹⁵ AIG Quality Standards for Inspections, Evaluations and Reviews for Office of Inspector General, General Standards, Subparagraph C.

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- C. Objectivity and Ethics
 1. JPOIG staff will comply with Section 2-1 of the JPOIG Policies and Procedures addressing Independence from Personal and External Impairments.
 2. JPOIG staff will attest to and acknowledge that there are no conflicts of interest which would impair judgment or acknowledge such conflicts of interest in each assigned matter through the case management system.

- D. Coordination
 1. JPOIG staff will comply with Section 2-6 of the JPOIG Policies and Procedures addressing Coordination in all inspection, evaluation and review matters.
 2. JPOIG staff will be alert to credible information of corruption, fraud, waste, abuse or illegal acts and will, upon discovery, report information in writing to the Inspection General.

- E. Timeliness
 1. JPOIG staff will prioritize inspections, evaluations and reviews, weighing needed and available resources, to ensure efforts are represented in work product which is current and relevant to Parish government.
 2. The supervising Deputy Inspection General will regularly review progress to ensure matters are appropriately prioritized to ensure timeliness of work product.

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Chapter 5 – Quality Standards for Inspector General Inspections, Evaluations and Reviews

Section: 5-2 Qualitative Standards

Subsection: 1 Quality Control

AIG STANDARDS: AIG Quality Standards for Inspections, Evaluations and Reviews- Qualitative Standards

IIA STANDARDS: N/A

PARISH ORDINANCE: JPCO §2-155.10

STATE LAW: N/A

I. INTRODUCTION

OIG should develop appropriate procedures for determining and documenting that supervision has been adequately exercised to ensure quality and expedite progress of inspections, evaluations and reviews.¹¹⁶

II. PURPOSE

The purpose of this section is to establish policies and procedures to ensure adequate control over quality and progress of inspections, evaluations and reviews.

III. SCOPE

This policy applies to JPOIG staff performing inspections, evaluations and reviews.

IV. POLICY

- A. The JPOIG staff should assess the assignment and prioritize, based upon the nature of the work to be performed, expected time to perform it, and anticipated resources:
1. Inspections;
 2. Evaluation;
 3. Review.
- B. The supervising Deputy Inspector General should exercise proper supervision from start of work through its completion to ensure inspections, evaluations and reviews are properly assessed and progress according to plan.
- C. The supervising Deputy Inspector General should ensure that JPOIG staff clearly understand assignments and tasks before work is begun.
- D. The JPOIG staff should work cooperatively with each other and the supervising Deputy Inspector General to recognize and acknowledge not only what work is to be done but also how to proceed and what is expected.

¹¹⁶ AIG Quality Standards for Inspections, Evaluations and Reviews, Qualitative Standards, Subparagraph A.

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V. PROCEDURE

- A. The JPOIG staff will maintain case files in an organized manner to include the following:
 - 1. Plan: A written plan will be completed for all inspections, evaluations and reviews. The plan will be prepared by the JPOIG staff and will outline the preliminary steps, anticipated and estimated time and resources required. The plan will be reviewed approved by the supervising Deputy Inspector General and Inspector General before implementation;
 - 2. Evidence and Case Supporting Material: All evidence and case supporting material collected during the course of an inspection, evaluation and review will be properly documented and maintained;
 - 3. Interviews: All interviews will be properly conducted and documented;
 - 4. Documented Activity: All pertinent activities will be documented in the JPOIG case management system;
 - 5. Written Report: At the conclusion, a written report will be prepared; and
 - 6. Attachment and other supporting material to include ordinances, case law, open source material, etc.

- B. The JPOIG staff will document actions and activity in the JPOIG Case management system.

- C. Supervising Deputy Inspector General will conduct progress reviews to verify the following:
 - 1. Inspections, evaluations and reviews are progressing in an efficient, effective, thorough and objective manner;
 - 2. Inspections, evaluations and reviews have been appropriately prioritized to ensure best use of time and resources; and
 - 3. Inspections, evaluations and reviews actions and activity are documented in the case management system, and files are maintained in an organized manner per procedures.
 - 4. Inspections, evaluations and reviews plans are followed, except as amended and approved.
 - 5. Evidence adequately supports the findings, recommendations and any referrals for possible criminal, civil, or administrative actions.
 - 6. Investigation objectives are met in a timely manner or extensions of time are documented.

- D. Supervising Deputy Inspector General will meet regularly with the JPOIG staff performing inspections, evaluations and reviews, collectively and individually, to assess whether staff understand what work is to be done, how to proceed and what is expected.

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- E. Supervising Deputy Inspector General should, where appropriate, document meetings with staff performing inspections, evaluations and reviews and guidance provided.

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Chapter 5 – Quality Standards for Inspector General Inspections, Evaluations and Reviews

Section: 5-2 Qualitative Standards

Subsection: 2 Planning

AIG STANDARDS: AIG Quality Standards for Inspections, Evaluations and Reviews – Qualitative Standards

IIA STANDARDS: N/A

PARISH ORDINANCE: JPCO §2-155.10

STATE LAW: N/A

I. INTRODUCTION

OIG inspections, evaluations and reviews work are to be adequately planned.¹¹⁷

II. PURPOSE

The purpose of this section is to establish policies and procedures for planning an inspection, evaluation or review.

III. SCOPE

This policy applies to JPOIG staff performing inspection, evaluation and review functions.

IV. POLICY

- A. The JPOIG inspections, evaluations and reviews will be adequately planned. Effective planning provides the basis for prioritizing inspections, evaluations and reviews and clearly identifies matters for inspection, evaluation or review.
- B. Planning should ensure that inspection, evaluation or review objectives will be met within anticipated time constraints of the assignment. Planning should help clarify issues to be addressed in advance of initiating the inspection, evaluation or review and includes preparing a written plan.
- C. A written plan should be completed for all inspections, evaluations and reviews and should contain the following information:
 - 1. Case number;
 - 2. Date assigned and staff assigned;
 - 3. Brief description of nature of inspection, evaluation or review;
 - 4. Objectives;
 - 5. References to relevant statutes, ordinances or policies;
 - 6. Preliminary steps;
 - 7. Time needed for completing preliminary steps and anticipated time for completion of assignment;
 - 8. Outline of anticipated techniques and methodology; and
 - 9. Approval by supervising Deputy Inspector General and Inspector General.

¹¹⁷ AIG Quality Standards for Inspections, Evaluations and Reviews, Qualitative Standards, Subparagraph B.

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- D. The JPOIG staff will keep the supervising Deputy Inspector General informed of material and necessary changes to the plan. Material and necessary changes to an approved plan will be made through submission of an “Amended” plan.

An approved inspections, evaluation, or review plan does not negate the need for approval to engage in specific techniques which may be the subject of separate JPOIG Policies and Procedures or any Inspections, Evaluations and Reviews Standard Operating Procedures.

V. PROCEDURE

- A. The JPOIG staff are to submit to the supervising Deputy Inspector General a written plan no later than ten days from the date the case has been assigned unless otherwise directed.
- B. JPOIG staff are not to act upon a plan until such time as the supervising Deputy Inspector General and Inspector General have approved the plan or the staff member receives specific written direction to the contrary.
- C. The JPOIG staff are to submit to the supervising Deputy Inspector General for approval an updated “Amended” plan, as needed, prior to engagement of planned inspection, evaluation or review activity.
- D. The JPOIG staff are to conduct inspections, evaluations and reviews according to an approved plan, recognizing that the plan may be modified to meet new or changing objectives or to recognize unanticipated developments.
- E. The JPOIG staff are to conclude inspections, evaluations and reviews within 180 days from the date of assignment absent an extension of time approved by the supervising Deputy Inspector General and the Inspector General.
- F. Extensions of time within which to complete an inspection, evaluation or review is to be approved by the Inspector General on a case-by-case basis and is to be documented in the case file.
- G. Planned inspections, evaluations and reviews activity, including any extensions of time, is to be documented in the JPOIG Case management system.

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Chapter 5 – Quality Standards for Inspector General Inspections, Evaluations and Reviews

Section: 5-2 Qualitative Standards

Subsection: 3 Data Collection and Analysis

AIG STANDARDS: AIG Quality Standards for Inspections, Evaluations and Reviews - Qualitative

IIA STANDARDS: N/A

PARISH ORDINANCE: JPCO §2-155.10(12) & (18)

STATE LAW: N/A

I. INTRODUCTION

Information and data gathered during an OIG inspection, evaluation and review about the organization, program, activity or function being examined should be consistent with objectives, carefully documented and organized, and lead to a reasonable basis for conclusions.¹¹⁸

II. PURPOSE

The purpose of this section is to establish policies and procedures which ensure that information and data gathered during an inspection, evaluation and review is documented and organized relative to objectives.

III. SCOPE

This policy applies to the JPOIG staff performing inspections, evaluations and reviews functions.

IV. POLICY

- A. Appropriate inspections, evaluations and reviews techniques should be chosen and employed to ensure that the data gathered is sufficiently reliable for making judgments regarding the matters being inspected, evaluated or reviewed.
- B. Sources of inspections, evaluations or reviews information should be documented in sufficient detail to provide a basis for assessing its reliability. Such documentation should address pertinent questions related to the objectives and provide information needed to determine the facts relative to efficiency, effectiveness, and compliance. Documentation should also provide needed information to determine facts that may be relevant to potential violations of laws, rules, regulations, policies and procedures.
- C. Data gathered and analyzed as part of the inspection, evaluation or review should be accurately interpreted, logically presented and maintained in the case file. The basis and support for the results of an inspection, evaluation or review should be carefully organized and described in the case file.

¹¹⁸ AIG Quality Standards for Inspections, Evaluations and Reviews, Qualitative Standards, Subparagraph C.

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V. PROCEDURE

- A. The JPOIG staff will plan and utilize appropriate techniques which may include but are not limited to:
1. Accessing records, information, data, reports, plans, projections, contracts, memoranda, correspondence, audit, reviews, papers, books, documents, computer hard drives, e-mails, instant messages, recommendations and other relevant material to an inspection, evaluation and review;
 2. Issuing request or subpoena for records, as needed, for records, information, data, reports, plans, projections, contracts, memoranda, correspondence, audit, reviews, papers, books, documents, e-mails, instant messages, recommendations and other relevant material to an investigation;
 3. Obtaining sworn and un-sworn written statements; and
 4. Conducting interviews.
- B. The JPOIG staff will document source of information in sufficient detail to provide a basis for assessing its reliability, to include but not be limited to:
1. Means and method of gathering and preserving integrity of data, including any required consent, approvals or receipts;
 2. Time, date and place data was gathered, unless otherwise identifiable;
 3. Person or entity from whom data was gathered, when necessary;
 4. Potential value and relevance to the inspection, evaluation and reviews, as appropriate.
- C. The JPOIG staff will gather, maintain and organize data within the file in a logical manner which supports efficient and effective access and analysis to include by way of example:
1. Segregating or identifying data within the file by subject matter, date or identifying feature;
 2. Segregating data by relevance to final report; and
 3. Rendering data searchable.

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Manual of Policies and Procedures

Chapter 5 – Quality Standards for Inspector General Inspections, Evaluations and Reviews

Section: 5-2 Qualitative Standards

Subsection: 4 Interviews and Statements

AIG STANDARDS: AIG Quality Standards for Inspections, Evaluations and Reviews - Qualitative

IIA STANDARDS: N/A

PARISH ORDINANCE: JPCO §2-155.10

STATE LAW: N/A

I. INTRODUCTION

Information and data gathered during an OIG inspection, evaluation and review should be carefully documented and organized relative to case objectives.¹¹⁹

II. PURPOSE

The purpose of this section is to establish policies and procedures which provide for gathering data and information through interviews and statements.

III. SCOPE

This policy applies to JPOIG staff performing inspections, evaluations and reviews functions.

IV. POLICY

A. The JPOIG recognizes that interviews are an important technique for gathering information and the preferred method for obtaining statements. Interviews should be part of the JPOIG inspection, evaluation or review plan, where appropriate.

B. The JPOIG interviews will be properly conducted and documented. All interviews are subject to inclusion in reports.

C. The JPOIG may, at its discretion, accept sworn and unsworn statements in lieu of or in addition to interviews.

V. PROCEDURE

A. Interviews

1. The JPOIG interviews will be planned whenever feasible. Prior to scheduling an interview, the JPOIG staff performing inspections, evaluations and reviews will spend adequate time researching facts, gathering pertinent data, reviewing pertinent data, assessing relationship of interviewee to inspection evaluation or review, and preparing written questions.

¹¹⁹ AIG Quality Standards for Inspections, Evaluations and Reviews, Qualitative Standards, Subparagraph C.

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2. The JPOIG staff will conduct interviews in private. No one other than the JPOIG staff and the person being interviewed are allowed to participate or be present.
 3. The JPOIG staff should schedule interviews to take place at the JPOIG office when appropriate, and interviews should be recorded. Recordings of interviews will be maintained in the case file.
 4. The JPOIG staff may take interviews under oath, but it is not required of every interview.
 5. The JPOIG staff will maintain any contemporaneous interview notes in the case file.
 6. The JPOIG staff will give appropriate warnings to those individuals suspected of violating a law or regulation.
 7. The JPOIG staff will document activity related to interviews in the case file.
- B. Written Statements
1. The JPOIG staff may, under certain circumstances, accept a written statement in lieu of an interview or in addition to an interview.
 2. Written statements may be taken under oath and with counsel of Legal if necessary to the integrity of the inspection, evaluation or review.

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Chapter 5 – Quality Standards for Inspector General Inspections, Evaluations and Reviews

Section: 5-2 Qualitative Standards

Subsection: 5 Evidence - Case Supporting Material

AIG STANDARDS: AIG Quality Standards for Inspections, Evaluations and Reviews - Qualitative

IIA STANDARDS: N/A

PARISH ORDINANCE: JPCO §2-155.10

STATE LAW: N/A

I. INTRODUCTION

Sufficient, competent, and relevant evidence is to be obtained to afford a reasonable basis for inspections, evaluations and reviews findings and conclusions.¹²⁰

II. PURPOSE

The purpose of this section is to establish policies and procedures which ensure that evidence and case materials are sufficient, competent and relevant to reported findings and conclusions.

III. SCOPE

This policy applies to the JPOIG staff performing inspections, evaluations and reviews functions.

IV. POLICY

- A. “Evidence” is understood to be any form of proof or probative matter collected during an inspections, evaluations and reviews, including but not limited to physical property, electronic storage mediums, documents, photographs, audio and electronic recordings and statements in any form.
- B. “Case supporting materials” are materials gathered to support findings and conclusions. Case supporting materials include any evidence collected during an inspection, evaluation and review as well as any copies of documents which afford a reasonable basis for findings and conclusions. Case supporting materials, other than evidence, will be maintained with the case file.
- C. The JPOIG inspections, evaluations and reviews findings and conclusions will be supported by adequate quantity and quality of evidence and case supporting materials which are competent:
 - 1. Evidence is sufficient if there is enough of it to support the report’s findings;
 - 2. Evidence used to support findings is relevant if it has logical, sensible relationships to those findings;

¹²⁰ AIG Quality Standards for Investigations, Qualitative Standards, Subparagraph D.

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3. Evidence is competent to the extent that it is consistent with fact.

V. PROCEDURE

- A. The JPOIG staff will document case materials and evidence which support findings and conclusions.
- B. The JPOIG staff will review case supporting materials and evidence prior to rendering a report for the purpose of verifying that there is sufficient, competent and relevant evidence to support findings and conclusions.
- C. The JPOIG staff will document the review and present proposed findings and conclusions to the supervising Deputy Inspector General for consideration and approval.
- D. The supervising Deputy Inspector General will review the case supporting materials and evidence in each investigation to ensure that it is sufficient, competent and relevant before approving findings and conclusions.
- E. The JPOIG staff will report upon case materials and evidence that support findings and conclusions in accordance with Section 5-7 of the JPOIG Policies and Procedures.

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Kim Raines Chatelain
Inspector General

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Chapter 5 – Quality Standards for Inspector General Inspections, Evaluations and Reviews

Section: 5-2 Qualitative Standards

Subsection: 6 Timeliness

AIG STANDARDS: AIG Quality Standards for Inspections, Evaluations and Reviews – Qualitative

IIA STANDARDS: N/A

PARISH ORDINANCE: JPCO §2-155.10

STATE LAW: N/A

I. INTRODUCTION

OIG inspections, evaluations and reviews investigations should be conducted in a timely manner.¹²¹

II. PURPOSE

The purpose of this section is to establish policies and procedures which ensure that inspections, evaluations and reviews are conducted in a timely manner.

III. SCOPE

This policy applies to the JPOIG staff performing inspections, evaluations and reviews functions.

IV. POLICY

A. The JPOIG recognizes that the timeliness of inspections, evaluations and reviews is often relevant to their value. The JPOIG inspections, evaluations and reviews should be conducted and concluded in a timely manner.

B. Inspections, evaluations and reviews necessarily require flexibility to adjust to changing priorities or unforeseen circumstances, such as the need to expand the scope or respond to an emergent need caused by other events. Timeliness of an inspection, evaluation or review will be assessed against complexity of a subject and availability of resources.

V. PROCEDURE

A. The JPOIG staff should conclude an inspection, evaluation or review within 180 days from the date of assignment in accordance with recognition that each may differ in scope and complexity. Requests for extensions of time are to be submitted via an “Amended” plan including a justification for the additional time requested.

¹²¹ AIG Quality Standards for Inspections, Evaluations and Reviews, Qualitative Standards, Subparagraph E.

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- B. The supervising Deputy Inspector General will conduct progress reviews to verify that inspection, evaluation or review are progressing in an efficient, effective, and thorough manner to ensure timeliness.

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Chapter 5 – Quality Standards for Inspector General Inspections, Evaluations and Reviews

Section: 5-2 Qualitative Standards

Subsection: 7 Fraud and Other Illegal Acts

AIG STANDARDS: AIG Quality Standards for Inspections, Evaluations and Reviews - Qualitative

IIA STANDARDS: N/A

PARISH ORDINANCE: JPCO §2-155.10

STATE LAW: N/A

I. INTRODUCTION

OIG inspections, evaluations and reviews staff have a responsibility to be alert for indications of illegal activity in the course of conducting their work. If during or in connection with an inspection, evaluation or review, staff become aware of illegal acts, or indications of such acts, they should promptly present such information to their supervisors for review and possible referral to the appropriate investigative office.¹²²

II. PURPOSE

The purpose of this section is to establish policies and procedures that provide for indications of illegal activity in the course of conducting an inspection, evaluation or review.

III. SCOPE

This policy applies to JPOIG staff performing inspection, evaluation and review functions.

IV. POLICY

- A. The JPOIG staff should be alert for indications of illegal activity in the course of conducting their work.
- B. An assessment of indications of illegal activity will be made by the Inspector General or, upon direction, a designated JPOIG staff person with knowledge, skills and expertise to assess whether information requires further action or change in Inspection, Evaluation or Review plan.

V. PROCEDURE

- A. The JPOIG staff will promptly present such information to their supervisors for review and possible referral to the appropriate investigative office.
- B. The information will be promptly assessed, and the JPOIG staff will be notified of any affect to the inspection, evaluation or review.

¹²² AIG Quality Standards for Inspections, Evaluations and Reviews, Qualitative Standards, Subparagraph F.

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- C. The Inspector General, in concert with the supervising Deputy Inspector General, will assess whether information is credible and must be reported to the district attorney, the United States attorney, or other appropriate law enforcement agency.¹²³

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¹²³ JPCO §2-155.10(11)(o).



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Chapter 5 – Quality Standards for Inspector General Inspections, Evaluations and Reviews

Section: 5-2 Qualitative Standards

Subsection: 8 Reporting and Follow-Up

AIG STANDARDS: AIG Quality Standards for Inspections, Evaluations and Reviews - Qualitative

IIA STANDARDS: N/A

PARISH ORDINANCE: JPCO §2-155.10

STATE LAW: N/A

I. INTRODUCTION

OIG inspections, evaluations and reviews activity should result in a timely written report. All reports shall present factual data accurately, fairly, and objectively, and present the results of inspections, evaluations and reviews in a persuasive manner.¹²⁴ Appropriate follow-up should be performed to ensure that any recommendations are adequately considered and properly addressed.¹²⁵

II. PURPOSE

The purpose of this section is to establish policies and procedures that provide for timely reporting and follow-up of inspections, evaluations and reviews activity.

III. SCOPE

This policy applies to JPOIG staff performing inspection, evaluation and review functions.

IV. POLICY

- A. Inspections, evaluations and reviews reports will comply with Section 2-7 of the JPOIG Policies and Procedures.
- B. Inspections, evaluations and reviews report language should be clear and concise and written in terms that are intelligible to informed professionals, recognizing that some assignments deal with technical, complex or sensitive material.
- C. Inspections, evaluations and reviews reports should be adequately supported by facts which are presented in a straightforward manner and without the use of unnecessary, obscure, or confusing verbiage.
- D. The JPOIG staff should take necessary steps to determine whether appropriate officials and responsible persons have taken timely, complete and reasonable actions to correct problems identified in the inspection, evaluation or review

¹²⁴ AIG Quality Standards for Inspections, Evaluations and Reviews, Qualitative Standards, Subparagraph G.

¹²⁵ AIG Quality Standards for Inspections, Evaluations and Reviews, Qualitative Standards, Subparagraph I.

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reports. Ultimate success depends on whether necessary corrective actions are taken.

V. PROCEDURE

- A. The JPOIG staff will prepare draft reports to include the following sections:
1. Introduction: this section should outline the inspection, evaluation or review and contain a statement of JPOIG jurisdiction as well as impetus for the inspection, evaluation or review.
 2. Scope: this section should set out scope of the inspection, evaluation or review and relevant timeframe.
 3. Background: this section should set forth facts and context necessary for reader to understand findings and conclusions. Facts should be supported by evidence and case supporting material which are referenced in footnotes.
 4. Findings: this section sets forth findings which are supported by facts and should be categorized, where appropriate, by efficiency, effectiveness, compliance fraud, waste or abuse.
 5. Conclusion: this section sets forth conclusions which are supported by findings and any recommendations for corrective action.
- B. The JPOIG staff will apply principles of good report writing.
- C. The JPOIG staff will follow-up on reports which include findings and recommendations related to systemic inefficiencies, ineffectiveness, non-compliance, weakness or patterns of conduct which leave government vulnerable to fraud, waste and abuse for re-assessment and subsequent report, if appropriate, within 18 months of the original report becoming final.

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Chapter 6 – Legal

Chapter 6 sets for the policies and procedures relating to the JPOIG legal function. The sections in this chapter state the authority of the JPOIG’s legal unit, duties and responsibilities of JPOIG legal counsel, legal positions of the JPOIG, and describes various statutes that may impact JPOIG activities.



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Chapter 6 – Legal Section: 6-1 Legal Function

AIG STANDARDS: AIG Basis of Legal Authority, Subparagraph F Independence

IIA STANDARDS: N/A

PARISH ORDINANCE: JP Charter §4.09(C); JPCO §2-155.10(15)

STATE LAW: La.R.S. 33:9613(G)

I. INTRODUCTION

The JPOIG is a department within Jefferson Parish government created by charter and is operationally independent from the legislative and executive branches of the parish.¹²⁶ The JPOIG may retain special counsel to ensure timely access to independent legal counsel in all matters under the purview of the JPOIG.¹²⁷

II. PURPOSE

The purpose of this section is to set out authority and establish the purpose and responsibility of the JPOIG legal function.

III. SCOPE

This section applies to the JPOIG staff engaged providing legal counsel.

IV. POLICY

A. Organizational and governing authority

1. Primary authority: The Inspector General is authorized by Parish Charter to retain special counsel. The Inspector General is empowered to appoint, employ, contract and remove such assistants, employees, consultants, and personnel, including, but not limited to legal counsel, as deemed necessary for the efficient and effective administration of the JPOIG activities. Retaining special counsel. The JPOIG will retain special counsel as permitted by Parish Charter to ensure timely access to independent legal counsel in all matters under the purview of the JPOIG.¹²⁸
2. Additional authority: The JPOIG is empowered to exercise certain legal authority, including but not limited to:
 - a. Issuing, and causing to be issued, subpoena to witnesses and requiring the production of records through administrative process or by court order.
 - b. Refer cases to the Ethics and Compliance Commission, the state board, and other enforcement agencies.

¹²⁶ JP Charter §4-09.

¹²⁷ JPCO §2-155.10(15). La.R.S. 33:9613(G) provides “A local ethics entity, ethics review board, or office of inspector general may employ its own legal counsel. A local ethics entity or ethics review board may also employ, contract with, or accept the assistance of other legal counsel in the conduct of a civil or criminal case.

¹²⁸ JP Charter §§4.04 and 4.09.

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- c. Assist law enforcement agencies in the conduct of any investigation.
 - d. Receive and maintain information which is protected as private, privileged or confidential.
 - B. The purpose and responsibility of the legal function is to support the mission of the JPOIG to detect and prevent fraud, waste and abuse and may include:
 - 1. Providing program oversight through administration, including but not limited to budget and procurement.
 - 2. Developing and maintaining internal policies and procedures to ensure they are legally sufficient, represent industry best practices and provide documentation for compliance.
 - 3. Providing expert and independent legal counsel to the JPOIG and staff on operational and programmatic matters.
 - 4. Support acquisition of information, assessment and evaluation of information, and investigative techniques.
 - 5. Support in-service training to staff on legal matters relevant to JPOIG operations as deemed necessary and appropriate and ensuring compliance.
 - 6. Coordinate with appropriate federal, state and local authorities on all programmatic matters.
- V. PROCEDURE
 - A. The legal function shall fall under the duties and responsibilities of a designated Deputy Inspector General.
 - B. The term JPOIG legal counsel, unless otherwise noted, will refer to the Deputy Inspector General or any other JPOIG employee whose job responsibilities fall under the Deputy Inspector General's supervision and who meets the qualifications by education, experience and licensure to fulfill the duties and responsibilities associated with this section.

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Chapter 6 – Legal

Section: 6-2 Legal Consultation and Review

AIG STANDARDS: AIG Basis of Legal Authority, Subparagraph F Independence

IIA STANDARDS: N/A

PARISH ORDINANCE: JP Charter §4.09; JPCO §2-155.10

STATE LAW: La.R.S. 33:9613(G)

I. INTRODUCTION

The JPOIG is a department within Jefferson Parish government created by charter and is operationally independent from the legislative and executive branches of the parish.¹²⁹ The JPOIG may retain special counsel to ensure timely access to independent legal counsel in all matters under the purview of the JPOIG.¹³⁰

II. PURPOSE

The purpose of this section is to state the duties of the JPOIG legal section relating to legal analysis, including review of cases, written reports, subpoenas, and other applications of legal sufficiency.

III. SCOPE

This section applies to all JPOIG staff.

IV. POLICY

A. Legal review of reports and other work product

1. JPOIG legal counsel will review reports for legal sufficiency and work product integrity before reports are issued.
2. JPOIG legal counsel will upon request of the Inspector General provide the following review:
 - a. Review of proposed ordinances and resolutions to provide an independent legal assessment of their potential impact;
 - b. Review of Parish contracts to determine rights, liabilities, efficiency and/or cost effectiveness;
 - c. Examination of data to assess efficacy of defending or prosecuting a lawsuit;
 - d. Conduct or participate in sworn statements of witnesses in an investigation;
 - e. Advise investigators or auditors regarding the relevant state statutes, local ordinances and administrative rules which may apply to a particular investigation or audit, as well as national legal trends and current affairs that may impact an investigation or audit.

¹²⁹ JP Charter §4-09.

¹³⁰ JPCO §2-155.10(15).

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- B. Legal review of request for records and subpoena
 1. JPOIG legal counsel may review request for records for legal sufficiency and form upon request by Inspector General or Deputy Inspector General.
 2. JPOIG legal counsel may independently assess whether requests for records are issued in compliance with applicable local and state authority.
 3. JPOIG legal counsel will receive requests for issuance of subpoena from JPOIG staff to determine efficacy and form.
 4. JPOIG legal counsel will prepare subpoena to ensure compliance with applicable local and state authority.

- C. Legal review of investigative requests
 1. The JPOIG legal counsel may be consulted prior to execution of certain investigative techniques, including accessing electronic mail, Parish security video, installation of covert video device, etc.
 2. Investigative techniques requiring prior approval per JPOIG policy are subject to approval of the Inspector General, or designee, which includes the Deputy Inspector General, who is also legal counsel, and other supervising Deputy Inspectors General.

V. PROCEDURE

- A. Legal review of reports and other work product
 1. Supervising Deputy Inspectors General will forward reports to legal counsel for review for legal sufficiency before issuance. Final approval on issuance of reports remains with the Inspector General.
 2. JPOIG legal counsel will upon request of the Inspector General provide the following review:
 - a. Review of proposed ordinances and resolutions to provide an independent legal assessment of their potential impact;
 - b. Review of Parish contracts to determine rights, liabilities, efficiency and/or cost effectiveness;
 - c. Examination of data to assess efficacy of defending or prosecuting a lawsuit;
 - d. Conduct or participate in sworn statements of witnesses in an investigation;
 - e. Advise investigators or auditors regarding the relevant state statutes, local ordinances and administrative rules which may apply to a particular investigation or audit, as well as national legal trends and current affairs that may impact an investigation or audit.

- B. Legal review of request for records and subpoena
 1. JPOIG staff shall utilize the prescribed JPOIG form for “Request for Records” when making a formal request for records. *See Appendix.*
 2. Supervising Deputy Inspectors General will forward to legal counsel a request for issuance of a subpoena on “Request for Subpoena”. *See Appendix.*

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3. JPOIG legal counsel will determine whether and when an administrative subpoena will be issued or the subpoena will be issued under court order.
 4. JPOIG legal counsel will prepare and oversee issuance of subpoena in accordance with JPOIG policy.
- C. Legal review of investigative requests
JPOIG staff may consult legal counsel on any matter relating to the legal efficacy of investigative techniques prior to executing such investigative technique. All requests for advice should be in writing to the JPOIG legal counsel, and the JPOIG legal counsel shall respond in writing.

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Chapter 6 – Legal Section: 6-3 Subpoena

AIG STANDARDS: N/A

IIA STANDARDS: N/A

PARISH ORDINANCE: JP Charter §4.09; JPCO §2-155.10

STATE LAW: La.R.S. 33:9613(A)(3)-(4)

I. INTRODUCTION

The JPOIG is a department within Jefferson Parish government created by charter and is operationally independent from the legislative and executive branches of the parish.¹³¹ The JPOIG may retain special counsel to ensure timely access to independent legal counsel in all matters under the purview of the JPOIG.¹³²

II. PURPOSE

The purpose of this section is to set out guidelines for preparing, reviewing, authorizing and serving subpoena by the JPOIG.

III. SCOPE

This section applies to all JPOIG staff.

IV. POLICY

A. Definition: For purposes of this policy, a subpoena shall be defined as court order summoning a witness for testimony or a written legal order requiring materials be produced.

B. Governing authority – state law

1. Subpoena *Ad Testificandum* and *Duces Tecum*. The JPOIG may compel the attendance of witnesses to be deposed under oath or the production of public and private records by issuing a subpoena. The subpoena *ad testificandum* or subpoena *duces tecum* shall be issued upon approval of a 24th Judicial District Court judge who will issue a written decision within 72 hours after receipt of application by the JPOIG. Any subpoena for production of private records shall be in compliance with all applicable constitutionally established rights and processes. Any request for financial records in the possession or under the control of a bank shall comply with the requirements and procedures of La.R.S. 6:333. The subpoena may be served by certified mail, return receipt requested, at the addressee's residence or business address, or by representatives appointed by the

¹³¹ JP Charter §4-09.

¹³² JPCO §2-155.10(15). La.R.S. 33:9613(G) provides "A local ethics entity, ethics review board, or office of inspector general may employ its own legal counsel. A local ethics entity or ethics review board may also employ, contract with, or accept the assistance of other legal counsel in the conduct of a civil or criminal case.

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office of inspector general, or may be directed for service to the office of the municipal police.¹³³

2. Administrative Subpoena *Duces Tecum*. The JPOIG may issue an administrative subpoena *duces tecum* for the production of books, records, documents or other evidence deemed relevant or material to an investigation, audit, or inspection. The subpoena *duces tecum* may be served by certified mail, return receipt requested, at the addressee's residence or business address.¹³⁴
3. Opposition to subpoena. An entity receiving a subpoena *duces tecum* may file a motion with the 24th Judicial District Court to amend or quash the subpoena.¹³⁵
4. Non-compliance. If the subpoena *duces tecum* is not quashed and is not complied with by the date for production of documents, the JPOIG may apply to the 24th Judicial District Court for an order compelling compliance with the subpoena. A person failing to comply shall be adjudged in contempt of court. The JPOIG may seek recovery of costs and attorney's fees associated with order to compel.¹³⁶
5. Subpoena for cause. The JPOIG may apply by verified petition to the district court where a person resides or has a business or in which materials may be found for an order protecting materials from concealment or destruction where there is reason to believe that materials essential to an investigation, examination, audit, inspection or performance review may be concealed or destroyed.¹³⁷
6. Additional authority: The JPOIG is empowered to exercise certain legal authority, including but not limited to:
 - a. Issuing, and causing to be issued, subpoena to witnesses and requiring the production of records through administrative process or by court order.
 - b. Refer cases to the Ethics and Compliance Commission, the state board, and another
 - c. Assist law enforcement agencies in the conduct of any investigation.
 - d. Receive and maintain information which is protected as private, privileged or confidential.

C. Issue of JPOIG Subpoena

1. Subpoena shall only be issued upon approval of the Inspector General. In his absence, the Deputy Inspector General may authorize a subpoena.
2. Subpoena should only be issued where there are no other means available to obtain the information or testimony sought, or when the circumstances

¹³³ La.R.S. 33:9613.

¹³⁴ La.R.S. 33:9613(A)(4). The administrative subpoena *duces tecum* shall be issued only in furtherance of authority provided by local ordinance and by Subsection D and E of this Section and shall comply with all applicable constitutionally established rights and processes. La.R.S. 433:9613(4)(a).

¹³⁵ La.R.S. 33:9613(A)(4)(c).

¹³⁶ La.R.S. 33:9613(A)(4)(d)-(B).

¹³⁷ La.R.S. 33:9613(C).

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of the investigation, audit, inspection or review requires that such information or testimony be obtained expeditiously without undue delay and/or be obtained preserving its evidentiary value.

3. JPOIG subpoenas will only be issued where the JPOIG has an active investigation, audit, inspection or review.
4. Subpoena must be narrowly drawn in breadth and scope so that the demand is not too indefinite and that information sought is likely to lead to information relevant to inquiry.
5. Where possible, the recipient of the subpoena will be allowed ten (10) calendar days to comply with the subpoena.

D. Review of JPOIG Subpoena

1. The JPOIG legal counsel will review all requests for subpoena and recommend whether the subpoena should issue under court authority or as an administrative subpoena.
2. The JPOIG legal counsel will review all subpoena for legal sufficiency and form before subpoena are issued.
3. The JPOIG legal counsel will be listed on all subpoena as the individual to contact regarding any issues with compliance.

V. PROCEDURE

A. Request for Subpoena

1. JPOIG staff shall utilize the prescribed JPOIG form for “Request for Subpoena.” *See* Appendix.
2. Supervising Deputy Inspectors General will receive and review “Request for Subpoena” for compliance with policy, and approve for review by legal counsel.
3. Review by legal counsel. JPOIG legal counsel will review “Request for Subpoena” and recommend whether subpoena should issue as an administrative subpoena will be issued or the subpoena will be issued under court order.

B. Issuance and Service of Administrative Subpoena

1. JPOIG legal counsel shall prepare the subpoena in a manner like the “Request for Subpoena” to ensure legal sufficiency.
2. Approval by Inspector General. The Inspector General will review the subpoena for final approval and service.
3. Subpoena shall be prepared and served via ordinary and certified mail.
4. A copy of the original will be placed in the main case file.
5. The return receipt will be placed in the maintained by legal counsel.

C. Issuance and Service of Subpoena

1. JPOIG legal counsel shall prepare the subpoena in a manner like the “Request for Subpoena” to ensure legal sufficiency.
2. Approval by Inspector General. The Inspector General will review the subpoena for final approval and service.

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3. Subpoena shall be prepared in duplicate originals. One executed original shall be served, and the second executed original shall be returned to the office and placed in the Subpoena Log. A copy will be placed in the main case file.
 4. Method of service shall be determined on a case-by-case basis.
- D. Subpoena for Testimony (*Ad Testificandum*)
1. Subpoena for testimony will be sought after consultation with JPOIG legal counsel.
 2. Once issued, appropriate arrangements will be made for the best method of memorializing, i.e. recording, transcribing, videotaping, etc. testimony.
 3. JPOIG legal counsel will be present for any testimony compelled by a JPOIG subpoena.
- E. Subpoena Log
1. Subpoena will be issued in sequential order for that calendar year. The JPOIG Subpoena numbering system will begin with the preface “SUB” followed by a hyphen, followed by a sequential number assigned in chronological order beginning with 001. The assigned JPOIG Subpoena number will appear on the subpoena. The corresponding JPOIG Case Number will also appear on the subpoena.
 2. The JPOIG will maintain a JPOIG Subpoena Log that tracks all subpoenas issued by the JPOIG. Copies of required notifications and original executed subpoenas will be maintained as part of the Subpoena Log. The Subpoena Log will track whether the subpoena has been complied with and any other material deemed relevant to the issuance and compliance of the subpoena will be maintained therein, including any costs incurred.
 3. JPOIG staff requesting issuance of subpoena have an affirmative duty to notify the custodian of the subpoena log whether the subpoena has been satisfied and of any issues relating to non-compliance.

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Kim Raines Chatelain
Inspector General

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Chapter 6 – Legal

Section: 6-4 Receipt of Request and Subpoena for Information

AIG STANDARDS: AIG Basis of Legal Authority, Subparagraph D

IIA STANDARDS: N/A

PARISH ORDINANCE: JP Charter §4.09; JPCO §2-155.10

STATE LAW: La.R.S. 33:9614 and La.R.S. 44:4 *et seq*

I. INTRODUCTION

The JPOIG is authorized to maintain appropriate confidentiality of records and, to the extent practical, of the identities of individuals who provide information to the JPOIG, unless it is necessary to make such records or identities public in the performance duties.¹³⁸

II. PURPOSE

The purpose of this section is to establish procedure for responding to requests from outside entities seeking documents or information gathered or maintained by the JPOIG and to ensure compliance with Louisiana Public Records Law and other applicable federal and state laws.

III. SCOPE

This section applies to all JPOIG staff.

IV. POLICY

A. Governing authorities

The right of access to JPOIG records and restrictions on disclosure is governed by both local and state law.

1. State law provides at La.R.S. 33:9614 that any material, records, data and information compiled by the JPOIG in an investigation, examination, audit, inspection, or performance review pursuant to state law is confidential and privileged and not subject to the Public Records Act until the investigation, examination, audit inspection, or performance review is complete. The investigation, examination, audit, inspection or performance review is not deemed complete if the JPOIG has submitted material, records, data and information from the results of such investigation, examination, audit, inspection or performance review to any other law enforcement or regulatory agency for further investigation or for the filing of criminal or civil prosecution, and if such investigation or prosecution has not been completed or become inactive.¹³⁹

¹³⁸ La.R.S. 33:9614. *See also* AIG Basis of Legal Authority, Subparagraph D.

¹³⁹ La.R.S. 33:9614:. *See also* JPCO §2-155.10(8) providing that all records of the office of inspector general shall be exempt from public disclosure and shall be considered confidential, unless it is necessary for the inspector general to make such records public in the performance of his duties. Unauthorized disclosure of information by the inspector general or any employee of the office of inspector general is subject to review and disciplinary action by

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2. Parish ordinance provides at JPCO §2-155.10(8) that all records of the office of inspector general shall be exempt from public disclosure and shall be considered confidential, unless it is necessary for the Inspector General to make such records public in the performance of his duties.
- B. Requests for records, information, materials or documents should immediately be forwarded to the legal counsel. The JPOIG may receive requests for information from several sources, including but not limited to:
1. Persons involved in investigations (complainants, subjects or witnesses);
 2. The public through public records requests;
 3. Subpoenas/court orders;
 4. Attorneys representing the Parish in litigation; and
 5. Media.
- C. Every reasonable effort will be made to ensure compliance with applicable provisions of the law regarding protection and disclosure of information and records.
- V. PROCEDURE
- A. The Inspector General will designate one or more Administrative staff members as the JPOIG Records Custodian for the purposes of processing Public Records requests.
- B. Requests for public records, Louisiana Public Records Act
1. Louisiana Public Records Act generally permits access *to certain* public records. Request for public records should be directed to:
JEFFERSON PARISH OFFICE OF INSPECTOR GENERAL
990 N. CORPORATE DRIVE, SUITE 300
JEFFERSON, LA 70123
 2. Any JPOIG staff who receives a written public records request will provide the request to legal counsel. Any employee who receives an oral public records request will memorialize the request in a memorandum and provide it to the legal counsel. After review, legal counsel will provide the Records Custodian with the request for processing.
 3. Requests for public documents or records must be date stamped or otherwise indicate the date and time of receipt of the request.
 4. The JPOIG staff who is designated as Records Custodian will log the request in the *Public Records Request Log* and locate any records pertaining to the request.
 5. The *Public Records Log* will contain:
 - a. A log of public records requests by calendar year;
 - b. The actual request, if in writing, or a memorandum memorializing the request;
 - c. Copies of any correspondence;

the appointing authority.

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- d. Copies of the records provided (if the records are voluminous then a notation of which documents were provided will be maintained in its place).
 - e. Notation(s) of actions taken on any request, including final disposition.
6. Acknowledgement and response
- a. Records Custodian will promptly acknowledge to the requester of receipt of request in an approved form.
 - b. Legal counsel will determine whether there are any limitations on disclosure, i.e. records or portions of records that are exempt or confidential pursuant to statute, and communicate that to the requesting party.
 - c. Records Custodian will provide the requester a written estimate of any fees. Such estimate will be provided using approved JPOIG form. No records will be copied, redacted or provided for inspection until the JPOIG receives payment of the estimated costs.
 - d. Records Custodian will provide the requester with the actual cost of production using approved JPOIG form. No records will be copied, redacted or provided for inspection until the JPOIG receives payment of the estimated costs.
 - e. At the time of production of duplicates or inspection, the Records Custodian will complete the approved form acknowledging production and satisfaction of request.
 - f. At the conclusion of any records inspection, the Records Custodian will complete and provide the requestor a copy of the completed form.
 - g. If the public records request pertains to records of an investigation, inspection or audit, copies of the request, response and other correspondence will be filed in the main case file in addition to the Public Records Log.
- C. Subpoenas or Court Orders
1. Subpoenas are official demands for testimony or information and can be issued by administrative bodies, prosecuting agencies or courts.
 2. Service of Subpoena
 - a. JPOIG personnel are not authorized to accept a subpoena that is specifically directed to another JPOIG employee without prior approval of the Inspector General or legal counsel.
 - b. Subpoenas directed generally toward the JPOIG or Custodian of Records may be accepted by any JPOIG personnel.
 3. Receipt of Subpoena/Court Order
All subpoenas and court orders must be forwarded to legal counsel as soon as they are received.

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- D. Media Inquiries
1. All requests for information from the news media must be immediately referred to legal counsel and/or the Inspector General.
 2. JPOIG personnel are prohibited from contact with the media without the express prior consent of the Inspector General.
- E. Requests from the Parish Attorney or outside counsel
1. All requests for information or documents must be forwarded to the 1st Assistant Inspector General.
 2. No information may be released without review and approval from the Inspector General or 1st Assistant Inspector General.
- F. Requests from Outside Law Enforcement Entities
All requests for information or documents should be forwarded to legal counsel for evaluation prior to release.
- G. Informal requests for non-investigative documents or information.
JPOIG personnel must consult their immediate supervisor prior to releasing any non-investigative information or documents to ensure that such release will not adversely impact an investigation or other matter.

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Kim Raines Chatelain
Inspector General

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Manual of Policies and Procedures

Chapter 7 –Case Management, Intake and Closure

Chapter 7 sets forth the policies and procedures relating to case management, intake of information, preservation of information and the initiation, assessment, assignment, documentation and disposition of matters.



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Chapter 7 – Intake and Case Management Section: 7-1 Case Management

AIG STANDARDS: AIG Quality Standards for Office – Quality Assurance
IIA STANDARDS: N/A
PARISH ORDINANCE: N/A
STATE LAW: N/A

I. INTRODUCTION

An OIG should ensure that work performed adheres to established policies and procedures, meets established standards of performance, and is carried out economically, efficiently, and effectively.¹⁴⁰

II. PURPOSE

The purpose of this section is to establish a policy and procedure to ensure that JPOIG work meets standards of performance and is carried out economically, efficiently and effectively through application of case management system.

III. SCOPE

This section applies to all JPOIG staff.

IV. POLICY

- A. Case Management System.- The JPOIG will maintain a comprehensive, automated case management system (CMTS) through which intakes, investigations, and audits will be documented, tracked and monitored.
- B. Intake/Case Numbers - All intakes, investigations, audits and inspections/evaluations/reviews will be assigned a JPOIG case number through CMTS. JPOIG case numbers will be formatted with the four-digit calendar year, a hyphen, and a four digit number. The first case number of each new calendar year will be 0001, and cases will be consecutively numbered throughout the year regardless of the type of case, i.e. audit or investigation.
- C. Intake/Case Assignments - Intakes, investigations, audits and inspections/evaluations/reviews will be assigned to JPOIG staff through CMTS by the Inspector General or the Inspector General's designee.
- D. Documenting Essential Intake/Case Information - Information pertinent to tracking and monitoring intakes/cases for quality assurance will be documented in CMTS to include the following:
 1. Attestation of independence from internal and external impairments by JPOIG staff;

¹⁴⁰ AIG Quality Standards for Office of Inspector General, Quality Assurance, Subparagraph A

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2. The origin of the audit or initial complaint, i.e. on-line complaint, telephone call to hotline, referral from an outside entity, internally initiated.
 3. Summary or descriptor for the intake or case.
 4. Nature of complaint or information, i.e. improper practice, theft, abuse of office.
 5. JPOIG staff member assigned and any subsequent changes in staff assignment.
 6. The date of assignment.
 7. The date of last action taken or review.
 8. Current status.
 9. Closure report.
 10. Referrals to internal and external entities.
 11. Compliance with applicable internal and external standards.
- E. Central repository for essential case documents - The JPOIG CMTS will be the central repository for essential documents related to intakes, investigations, audits and inspections/evaluations/reviews.
- F. Essential documents
1. Essential documents for Intakes include when applicable:
 - a. Approved Intake Report.
 - b. Copies of any original correspondence received or submitted. In cases where data is voluminous, a partial representative submission or synopsis may be sufficient.
 - c. Any approved requests and results for specialized investigative techniques.
 - d. Approved letters of referral.
 - e. Approved Closure Reports.
 2. Essential documents for Cases (Audits, Investigative or Inspections/Evaluations/Reviews) includes when applicable:
 - a. Approved planning documents.
 - b. Any approved requests and results for specialized investigative techniques and/or subpoenas.
 - c. All documentation necessary to prove or disprove findings and observations.
 - d. Approved letters of referral.
 - e. Approved Confidential Draft Reports and responses received.
 - f. Approved Confidential Final Reports.
 - g. Approved Public Reports.
- G. Maintaining and storing nonessential case material - The JPOIG will maintain additional secured storage for information which is relevant to cases (audits, investigations and inspections/evaluations/reviews) but is not essential to the internal tracking and monitoring progress.

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H. Access to intakes/case files -- Access by JPOIG staff to case materials through CMTS or otherwise will be appropriately limited and segregated to preserve confidentiality and to ensure independence and integrity of work product.

V. PROCEDURE

- A. The JPOIG staff are to document all information pertinent to tracking and monitoring cases for quality assurance in CMTS in accordance with this policy.
- B. The JPOIG staff shall attest that there exist no conflicts of interest whenever inputting information into CMTS and/or modifying a file in CMTS. Conflicts of interest must be documented by the JPOIG staff in CMTS and reported to the appropriate supervisor in accordance with JPOIG policies.
- C. JPOIG staff will store essential documents related to intakes, investigations, audits and inspections/evaluations/reviews in CMTS.
- D. JPOIG staff will maintain a physical case file in an orderly fashion and in a secured location.

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Kim Raines Chatelain
Inspector General

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Manual of Policies and Procedures

Chapter 7 – Intake and Case Management

Section: 7-2 Intake of Complaints and Case Approval

AIG STANDARDS: AIG Quality Standards for Office – Quality Assurance

IIA STANDARDS: N/A

PARISH ORDINANCE: N/A

STATE LAW: N/A

I. INTRODUCTION

An OIG should ensure that work performed adheres to established OIG policies and procedures, meets established standards of performance, and is carried out economically, efficiently, and effectively.¹⁴¹

II. PURPOSE

The purpose of this section is to establish the policy and procedures attendant to the JPOIG case management system.

III. SCOPE

This section applies to all JPOIG staff.

IV. POLICY

A. The JPOIG will maintain a case management system (CMTS).

B. Complaints and cases will be logged and tracked through CMTS in accordance with Section 7-1 of this policy.

C. Complaints constitute the initial receipt of information and are logged and tracked in the CMTS system as an “Intake”.

D. Cases are the result of accepted complaints and are assigned to either the investigative, audit or inspections/evaluations/reviews section and will be logged and tracked in CMTS.

V. PROCEDURE

A. Complaints

1. Complaints arise in the form of an e-mail to the JPOIG central e-mail address, by phone, by mail, the website complaint form or in person. Complaints may also arise from internal intelligence developed or discovered by the JPOIG staff.

2. After a complaint is identified or received, the process for entry of an Intake into the CMTS is performed as soon as possible, and is shown below in chronological order.

¹⁴¹ AIG Quality Standards for Office of Inspector General, Quality Assurance, Subparagraph A

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- a. The Inspector General is informed of the complaint and directs a staff member to proceed with the creation of a new intake within CMTS.
- b. JPOIG staff member accesses the CMTS, and a consecutive new intake number is assigned.
- c. JPOIG staff member inputs the following data into CMTS:
 - i. The data group is always “Intake”.
 - ii. The case summary is a brief narrative description of the case.
 - iii. The status defaults to “Draft”.
 - iv. The Intake origin represents the manner in which the complaint was received.
 - v. The categorization tier #1 automatically defaults to “Intake”.
 - vi. The organization name is selected from a drop-down selection window that best depicts the department, agency or non-Jefferson Parish entity involved.
 - vii. The file location is the Investigative, Audit or Inspections/Evaluations/Reviews shared drive location of the electronic case documents.
 - viii. The assigned group is “Intake Assignment-All team”.
 - ix. Specific allegations may be added at the defined tab with a new or separate allegation recorded for each specific allegation.
 - x. Specific individuals or locations are either related to the intake or added to CMTS and related to the intake.
 - xi. The case is saved and closed to preserve all entered data.
3. The intake is routed automatically to the Inspector General’s queue for assignment to a team or individual.
4. All documentation received is submitted into the applicable CMTS intake file and/or saved into designated shared drive case folder (audits, investigations or evaluations) with the same identification number used as a reference.
5. The JPOIG staff assigned then has a period of 45 calendar days to complete the preliminary review of the intake, and prepare a Preliminary Review Closure Report setting forth the facts of the complaint, actions taken, and a recommendation to close the intake as information only, accept for investigation or audit, refer to another agency, or decline and close due to a lack of substantive evidence supporting the allegations.

B. Cases

1. Cases are automatically created in CMTS when a complaint/intake is approved for further action.
 - a. The original tracking number carries through to a newly created case, which is separate and distinct from the intake file.
 - b. All data and documents also are replicated in the newly created CMTS case.

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2. Upon assignment by the Inspector General, the case will be worked in a manner that includes the following elements.
 - a. Cases are assigned as an audit, an investigation or an inspection/evaluation/review.
 - b. The supervising Deputy Inspector General assigns the case to the designated staff for further action.
 - c. The JPOIG staff acknowledges no-conflicts of interest exist if not previously involved in the investigation, audit or inspection/evaluation/review.
 - d. Assigned JPOIG staff develops a plan in accordance with these policies and section specific guidance.
 - e. The supervising Deputy Inspector General applies a compliance checklist to the case that tracks elements required to demonstrate compliance.
 3. The case is then in an “under investigation, audit or inspection/evaluation/review” status while actions are taken consistent with the approved plan.
 4. Upon conclusion of the field work a Confidential Draft Report is prepared for approval by the respective supervising Deputy Inspector General, legal and the Inspector General.
 5. The approved Confidential Draft report to Parish recipients is issued in accordance with policy for a review and response period of at least 30 business days.
 6. The approved Confidential Draft report to Non-Parish recipients is issued in accordance with policy for a review and response period of at least 20 business days.
 7. The Confidential Final Report is issued to the Ethics and Compliance Commission with the inclusion of all responses received.
 8. After a period of no less than 5 days a Public Report will be issued and posted on the JPOIG website.
 9. Upon conclusion of the case, assigned JPOIG staff and the supervising Deputy Inspector General will ensure that:
 - a. The compliance checklist is complete and supported.
 - b. All documentation required to prove or disprove has been submitted to CMTS.
 - c. Any received responses, referrals or other relevant material has been submitted to CMTS.
 10. Upon proper completion of the case and CMTS being fully updated the assigned staff will request final supervisory approval for Closure.
- C. Supervisor approval is required at two points during both the intake and case process.
1. Approvals are initiated when the assigned JPOIG staff moves the status of the intake or case to specific status’ that serve as checkpoints. See chart below:

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Intake		Case	
STATUS	APPROVAL	STATUS	APPROVAL
Draft		Under Investigation/Audit	
Draft Approval	DIG, IG, & Legal	Under Review	DIG, IG, & Legal
Preliminary Review		Conf. Draft Report Issued	
Recommendation		Conf. Final Report Issued	
Recommendation Approval	IG	Public Report Issued	
		Closure Approval	IG

2. Supervisory approvals are managed and recorded through CMTS.

APPROVED BY:

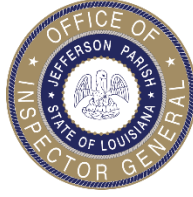


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Inspector General

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Chapter 8 – Access Management and Evidence

Chapter 8 sets forth the policies and procedures relating to JPOIG security, access and records management, including evidence and case supporting material.



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Chapter 8 – Access Management and Evidence

Section: 8-1 Accessing Parish Information and Documents

AIG STANDARDS: AIG Quality Standards for Office – Direction and Control

IIA STANDARDS: N/A

PARISH ORDINANCE: JP Charter §4.09; JPCO §2-155.10

STATE LAW: La.R.S. 33:9611 *et seq*

I. INTRODUCTION

The JPOIG shall have access to all records, information, data, reports, plans, projections, matters, contracts, memoranda, correspondence, audits, reviews, recommendations, and any other material of the parish council, office the parish president, all parish departments, agencies, boards, and commissions.¹⁴²

II. PURPOSE

The purpose of this policy is to set forth general protocols and procedures for accessing parish records, information, data, reports and the like by the JPOIG belonging to the Parish Council, office of the Parish President, all parish departments, agencies, boards and commissions. This policy is not intended to address routine requests for administrative business of the JPOIG or the collection of evidence.

III. SCOPE

This policy applies to all JPOIG staff.

IV. POLICY

A. Parish records, information, data, memoranda, correspondence, documents, computer hard drives, e-mails, instant messages, recommendations, or any other material shall be accessed by sending a written request to the department having custody of those records. The parish attorney, or a designee from the parish attorney's office, shall be copied on all such requests. In the alternative, a written request may be sent directly to the parish attorney or his designee to assist in obtaining the information. All such written requests and the responses thereto are confidential and shall not be disclosed by any parish department or employee to any third parties or other parish employees.¹⁴³

B. Access to parish records, information, data, reports and the like by the JPOIG shall be for the use in active audits, investigations, and inspections/evaluations/reviews only.

¹⁴² JPCO §2-155.10(12)

¹⁴³ JPCO §2-155.10(12)(v)

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- C. Any parish record, information, data, report and the like obtained or retrieved by the JPOIG shall be maintained and retained by the JPOIG in accordance with applicable local, state or federal law.
- D. Parish records, information, data, reports and the like may only be used or referenced by the JPOIG in a report or written recommendation as permitted or not otherwise prohibited by local, state, or federal law.
- E. Access to records, information, data, reports and the like by the JPOIG which are contained within or otherwise stored upon personal property, including by way of example cell phones or other personal digital devices, shall be in accordance with state law.¹⁴⁴

V. PROCEDURE

- A. Cooperation with the JPOIG
Parish officials, employees, commissioners and board members shall cooperate with the JPOIG in any audit, investigation or inspection/evaluation/ review.¹⁴⁵
- B. Authorization and Records of Authorizations
 1. JPOIG employees may access and retrieve parish records, information, data and reports upon assignment of intake, preliminary review or active matter, to include but not be limited to the following:
 - a. Information contained in Parish financial management system (AS400);
 - b. Information contained in Parish data bases, e.g. vehicle tracking data; and
 - c. Any documents which are considered public records, other than Parish emails.
 2. Request shall reference an active audit, investigation or inspection/evaluation/ review. Records of access shall be maintained by the JPOIG.
 3. Inspector General or Inspector General's designee shall authorize request and retrieval of parish records, information, data, and reports by JPOIG employees not otherwise identified above.
- C. Access to parish records, information, data, reports and the like, generally
 1. Requests for parish records, information, data, reports and the like may be via electronic mail, written, or verbal. Absent exigent circumstances, reasonable notice will be provided of needed parish records, information data, reports and the like. JPOIG employee will notify Inspector General or Inspector General's designee of exigent circumstances to ensure prompt access to records, information, data, reports and the like.

¹⁴⁴ La.R.S. 33:9613.

¹⁴⁵ JPCO §2-155.10(19)

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2. Copies of records shall be the preferred method of obtaining records, information, data reports and the like shall. Review of original records may be required.
 3. Upon determination by JPOIG employee that original document is integrally related to active audit, investigation or performance review, JPOIG shall secure the original parish record, information, data, reports and the like but shall provide the custodian a copy until such time as the original may be returned. Receipt for originals shall be provided to custodian.
- D. Access to electronic data (other than e-mails). Data which is stored electronically can present unique considerations. The request is dependent on the role the data will serve, i.e. background information or direct evidence. While the decision is ultimately made by the JPOIG staff, the decision should be made in consultation with their respective supervising Deputy Inspector General and Inspector General.
- E. Request for parish e mails
1. Written approval is required by the Inspector General or designee prior JPOIG staff requesting Parish e-mails:
 - a. The tracking number of the open investigation, audit, inspection or performance review.
 - b. The parameters of the queries to be run and the nexus between those parameters and the inquiry.
 2. Recovery of Data: Authorized and approved JPOIG staff shall follow the procedures set forth below in recovering emails:
 - a. Any data, including complete query responses, will be saved to a JPOIG electronic storage device for transportation purposes only.
 - b. The data shall be transferred to the JPOIG secure server within the folder designated for the specific case or within the case management system once the system is in place.
- F. Use of Data: Archival data recovered via this process must be carefully reviewed to ensure that confidential information and/or attorney-client privileged information is handled in accordance with the lawful restrictions on that data. Access to records, information, data, reports and the like by the JPOIG which are located at or otherwise stored upon personal property, including by way of example cell phones or other personal digital devices, shall be in accordance with state law.¹⁴⁶
- G. Confidentiality and Privilege
1. All records of the JPOIG are exempt from public disclosure and shall be considered confidential, unless disclosure is required of the Inspector General in the performance of official duties.
 2. Communications, including legal communications, which are confidential or otherwise private shall be kept confidential except as otherwise provided or permitted by local, state or federal law.

¹⁴⁶ La.R.S. 33:9613.

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3. JPOIG employees shall not disclose any information which may reasonably be considered confidential, privilege or otherwise protected, nor shall such information be referenced in a report, absent a specific review and determination by the 1st Assistant Inspector General the appropriateness of the use of information.
- H. JPOIG staff should direct any questions regarding this policy to their direct supervisor, legal counsel or both.

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Kim Raines Chatelain
Inspector General

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Chapter 8 – Access Management and Evidence Section: 8-2 Evidence

AIG STANDARDS: AIG Quality Standards for Office – Direction and Control

IIA STANDARDS: N/A

PARISH ORDINANCE: JP Charter §4.09; JPCO §2-155.10

STATE LAW: La.R.S. 33:9611 *et seq*

I. INTRODUCTION

The JPOIG shall have access to all records, information, data, reports, plans, projections, matters, contracts, memoranda, correspondence, audits, reviews, recommendations, and any other material of the parish council, office the parish president, all parish departments, agencies, boards, and commissions.¹⁴⁷

II. PURPOSE

This purpose of this policy is to generally set forth the guidelines to designate and govern the responsibilities for obtaining, handling, securing, protecting, preserving, processing and disposing of evidence gathered in the course of case development.

III. SCOPE

This policy applies to all JPOIG staff.

IV. POLICY

- A. It is the duty and obligation of the JPOIG to maintain all evidence in such a manner as to prevent its destruction and alteration.
- B. Items removed as evidence by JPOIG staff during the course of a case must be properly collected, recorded, stored, and disposed in an appropriate manner.
- C. Items of physical or electronic evidence which may be relevant to potential quasi-judicial and judicial proceedings will be identified, collected, preserved, secured and stored in a fair and consistent manner, which would encompass collecting exculpatory evidence.

V. PROCEDURE

- A. Collection of Evidence
The JPOIG staff will collect all evidence in such a manner as to preserve its condition, prevent the introduction of foreign materials, ensure as complete a sample as possible and practical and mark the evidence in the proper manner so as not to destroy it.
 1. Jefferson Parish Government: Evidence that is otherwise the property or product of Jefferson Parish will normally be collected from Parish

¹⁴⁷ JPCO §2-155.10(12)

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departments, employees, and record holders. Evidence which may fall in the purview of Jefferson Parish government are those things that are owned by the Parish, generated or created by Parish employees in their official capacity, generated or created on or with Parish equipment, or otherwise tied to the operation of Jefferson Parish government.

2. Outside Entities: Evidence may also be obtained from outside entities or vendors voluntarily, by subpoena or search and seizure.
3. Individuals: Evidence that is not otherwise within the purview of Jefferson Parish government may be collected from individuals voluntarily by subpoena or search and seizure.
4. Interviews: Evidence may be generated through interviews (recorded, taped, or witnessed).
5. Financial Records: In some cases, financial records can be obtained from a financial institution on a formal written request, with written authorization of the account holder, administrative subpoena, etc.

B. Recording of Evidence

Evidence stored in the evidence room shall be logged in on a Property Record form that is verified by an Evidence Manager and recorded in the Evidence Log.

1. Property Record
 - a. Each piece of evidence shall be submitted on a Property Record form. Multiple identical items or like items without individual significance can be submitted on the same form. The Property Record form shall include:
 - i. the case number,
 - ii. the submitting employee,
 - iii. the date the item entered JPOIG custody,
 - iv. where and/or who it was recovered from, and
 - v. the initials and ID # of the Evidence Manager or an Evidence Officer.
 - b. Anytime evidence is checked in or out for additional processing or judicial proceedings the action shall be reflected on the Property Record in subsequent lines as provided and include:
 - i. the removing/returning employee,
 - ii. the date the item was removed or returned to JPOIG custody,
 - iii. the purpose for the removal, and
 - iv. the initials and ID # of the Evidence Manager or an Evidence Officer releasing or accepting the item.
 - c. Anytime the item will be placed into the custody of another person or entity, that transfer must be recorded in a similar fashion on a subsequent line as stated above. The Property Record must reflect a full chain of custody.
2. Evidence Log
 - a. All evidence entering or leaving the evidence room will be recorded in the evidence log.

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- b. Each entry must be initialed by the submitting employee and the Evidence Manager or an Evidence Officer.
- c. The evidence log shall remain within the evidence room. Any removal of the evidence log shall be recorded in the evidence log to include the purpose for its removal.

C. Storage of Evidence

The JPOIG shall store and maintain evidence within a secure and restricted evidence room.

- 1. The evidence room shall be monitored via video, card access and independently alarmed.
- 2. Access is restricted to those individuals submitting evidence or designated as the Evidence Manager or as an Evidence Officer.
- 3. The JPOIG shall maintain an Evidence Room Entry Log of all persons who enter the evidence room.

D. Return/Destruction of Evidence

At the conclusion of a case, when appropriate (considering legal procedures and appellate proceedings) all evidence will either be returned or destroyed. To ensure this protocol is followed, no evidence can be returned or destroyed until it is documented in the case file that:

- 1. All criminal, civil, administrative hearings and procedures are concluded.
- 2. If no adjudication - a declination statement or letter from the appropriate Assistant District Attorney or Assistant United States Attorney is in the file.
- 3. All potential forfeitures, fines, restitutions have been identified.

APPROVED BY:



Kim Raines Chatelain
Inspector General

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Manual of Policies and Procedures

Chapter 8 – Access Management and Evidence Section: 8-3 Maintaining Case Supporting Material

AIG STANDARDS: N/A

IIA STANDARDS: N/A

PARISH ORDINANCE: JP Charter §4.09; JPCO §2-155.10

STATE LAW: La.R.S. 33:9611 *et seq*

I. INTRODUCTION

The JPOIG shall have access to all records, information, data, reports, plans, projections, matters, contracts, memoranda, correspondence, audits, reviews, recommendations, and any other material of the parish council, office the parish president, all parish departments, agencies, boards, and commissions.¹⁴⁸

II. PURPOSE

The purpose of this section is to establish procedures for documenting receipt of case supporting materials.

III. SCOPE

This policy applies to all JPOIG staff.

IV. POLICY

Proper use and documentation of supporting material is a substantial element of every case. Supporting material collected or obtained from outside sources or obtained or developed internally should be done in such a way as to ensure that all relevant supporting material is obtained and documented in a manner sufficient to support the conclusions.

V. PROCEDURE

A. “Case supporting materials” are materials gathered to support findings and recommendations. Case supporting materials may include any evidence collected as well as any copies of documents which afford a reasonable basis for an audit or investigative finding or conclusion:

1. Internally researched, gathered, and produced supporting material may include criminal histories, personnel and corporate records, employment and labor records, court records, property information, and other investigative information assembled by JPOIG staff.
2. Other materials, such as bank records, telephone records, utility records, and corporate and business records obtained from a business entity, may be obtained voluntarily or through the issuance of a subpoena.
3. “Case supporting materials” which constitute evidence will be identified, logged, secured, tracked and maintained in accordance with Section 8-2, Evidence.

¹⁴⁸ JPCO §2-155.10(12)

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- B. Case supporting material assembled in the course of an audit or investigation will be documented as follows:
1. The time, date and location of all case supporting material collected will be documented in the JPOIG file via notes or the Activity Log/Notes form. *See* Appendix.
 2. Where feasible, the auditor or agent will initial, date, and note the name of the person from whom the document was obtained on the front of the document.

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Chapter 8 – Access Management and Evidence Section: 8-4 Cooperation and Interviewing

AIG STANDARDS: AIG Basis for Legal Authority, and AIG Quality Standards for Offices

IIA STANDARDS: N/A

PARISH ORDINANCE: JPCO §2-155.10(12)

STATE LAW: La.R.S. 33:9613

I. INTRODUCTION

An OIG should be established by law which authorizes the OIG to conduct specific functions.¹⁴⁹ An OIG should be authorized by law to maintain appropriate confidentiality of the identities of individuals who provide information to the OIG.¹⁵⁰ An OIG should establish and follow procedures for safeguarding the identity of confidential sources.¹⁵¹

The JPOIG is authorized under parish ordinance and state law to maintain the confidentiality and, to the extent practicable, the identities of persons who provide information to the JPOIG.

II. PURPOSE

The purpose of this section is to establish an effective and efficient process that supports communication and sets expectations regarding interviews by the JPOIG of persons who are believed to possess knowledge relevant to any investigation, audit, inspection or performance review.

III. SCOPE

This policy applies to all JPOIG staff.

IV. POLICY

A. JPOIG staff will make investigations and examinations pursuant to state law as it deems necessary in order to carry out its duties and responsibilities in any legally appropriate manner, to include but not be limited to, interviewing and receiving information from any person believed to possess knowledge relevant to any investigation, audit, inspection or performance review.¹⁵²

B. JPOIG staff may reasonably expect that every parish officer, employee, department, agency, special district, board and commission; and every contractor, subcontractor, and licensee of the parish, as well as every applicant for certification of eligibility for parish contract or program will cooperate with the

¹⁴⁹ AIG Basis for Legal Authority, Subparagraph B.

¹⁵⁰ AIG Basis of Legal Authority, Sub-paragraph D.

¹⁵¹ AIG Quality Standards for Office of Inspector General, Confidentiality Sub-paragraph A.

¹⁵² La.R.S. 33:9613(A)(1).

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JPOIG in any investigation, audit, inspection or performance review in accordance with local ordinance.¹⁵³

- C. JPOIG may avail itself of all legal remedies, including but not limited to, subpoena issued under court order, to compel any person who withholds cooperation from the JPOIG to the detriment and impairment of any investigation, audit, inspection/evaluation/review to appear before the JPOIG staff for interviewing.
- D. JPOIG will organize and conduct interviews with any person believed to possess knowledge relevant to any investigation, audit, inspection/evaluation/review in a manner that is secure and efficient for the JPOIG based upon the individual circumstances present. However, JPOIG staff will consider the person's personal and professional obligations in the scheduling and coordination.
- E. JPOIG may publicly report upon all instances in which there is a failure to cooperate with the JPOIG to gain information from any person believed to possess knowledge relevant to any investigation, audit, inspection or performance review and any related consequences and costs.

V. PROCEDURE

A. Scheduling and location of interviews

- 1. Time and date of interviews
 - a. JPOIG interviews should, when possible, be scheduled at a time and date mutually convenient and agreeable to the JPOIG staff and person being interviewed.
 - b. When scheduling interviews, JPOIG staff are to consider the personal and professional obligations of the person being interviewed, but not the personal preferences of the individual's supervisor or employer.
 - c. In the absence of an agreement, JPOIG staff are to schedule interviews to take place Monday through Friday between the hours of 8:30 AM to 4:30 PM.
- 2. Location of interviews
 - a. JPOIG will conduct interviews at the JPOIG office, 990 N. Corporate Drive, Suite 300, absent circumstances attendant to the audit, investigation, or performance review which supports conducting the interview in an alternate location.
 - b. Attendant circumstances related to the audit, investigation or performance review may result in a determination by the JPOIG that an interview be conducted outside of the JPOIG office including, by way of example
 - The need to have ready access to files, data, equipment, processes and physical locations and
 - Content and context of interview.

¹⁵³ JPCO §2-155.10(19).

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- c. Attendant circumstances related to the audit, investigation or performance review does not include the personal preference or convenience of the person being interviewed, their supervisor or employer.
 - d. When JPOIG interviews are conducted outside of the JPOIG office, interviews may be conducted at the person's office, place of employment or other location mutually agreed upon by the JPOIG and the person being interviewed.
 3. Providing notice of interview
 - a. JPOIG may communicate with the person being interviewed about the time, date and location of the interview by any means reasonable under the circumstances, including by way of example e-mail, electronic messaging, telephone call or voice message.
 - b. JPOIG will confirm the time, date and location of the interview with the person being interviewed by any means reasonable under the circumstances.
 - c. JPOIG is under no obligation to provide notice to supervisors or management.
 - d. Parish employees receiving a request for interview are under no obligation to advise supervisors or management of an interview request. However, Parish employees may advise supervisors or management of their receipt of notice to interview if they wish to do so.
 - e. When necessary, JPOIG may provide or send a written "Notice of Interview" with the time, date and location of the interview to the person being interviewed, and when appropriate, to the person's supervisor or employer. Use of a written "Notice of Interview" should be an exception and not the customary practice for confirming time, date and location of interview.
- B. Documenting and recording interviews
 1. The time, date, location and name of persons participating in the JPOIG interview will be documented by the JPOIG staff and maintained as a confidential record except as otherwise provided or permitted by law.
 2. JPOIG interviews may be audio and/or video recorded by JPOIG staff.
 3. No outside recording devices are permitted in JPOIG offices.
- C. Confidentiality of interviews and permitted attendees
 1. JPOIG staff shall comply with federal, state and local law regarding confidentiality of JPOIG investigations, audits and performance reviews as well as JPOIG policies and procedures when organizing and conducting interviews.
 2. JPOIG staff shall maintain the confidentiality of information learned from interviews in accordance with federal, state and local law.
 3. JPOIG staff can confirm the time, date and duration of the interview *with* the person's knowledge and to the person's immediate supervisor when

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interview takes place during working hours, unless otherwise prohibited by law.

4. JPOIG staff are not to confirm the identity, time, date, duration or location of any interview which takes place outside of working hours, unless otherwise compelled by law.
5. JPOIG interviews shall be conducted in a confidential manner, and participants are restricted to JPOIG staff, the person being interviewed and the person's private attorney. No other individual or representative is permitted.

D. Cooperation and reporting upon lack of cooperation

1. JPOIG staff can expect that every parish employee, parish official, and any other individual, who by virtue of appointment, agreement, contract or employment is subject to the authority and jurisdiction of the JPOIG, will cooperate with JPOIG staff to organize and conduct an interview.
2. JPOIG staff are to notify the person's supervisor or employer, when appropriate, of a person's failure to cooperate in the organizing and conducting of an interview.
3. It is expected that management will cooperate by ensuring that employees are directed to cooperate and provided the opportunity to do so.
4. JPOIG staff are to document any instances of failure to cooperate.
5. JPIOG may seek a subpoena under court authority to compel the attendance at an interview of any individual who fails to cooperate with the JPOIG in organizing and conducting an interview in accordance with state and local law and in accordance with JPOIG policies and procedures.
6. JPOIG may publicly report upon all instances in which there is a failure to cooperate with the JPOIG to gain information from any person believed to possess knowledge relevant to any investigation, audit, inspection or performance review and any related consequences and costs.

APPROVED BY:



Kim Raines Chatelain
Inspector General

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Manual of Policies and Procedures

Chapter 9 –Administrative Policies

Chapter 9 sets forth administrative policies and procedures relating to employee conduct, accountability and compensation.¹⁵⁴ These policies and procedures may be more restrictive than those imposed upon other Parish employees or Parish officials. Where Chapter 9 specifically conflicts with Parish ordinances and policy governing employee conduct, these policies shall take precedence.¹⁵⁵ In the absence of specific JPOIG policy, JPOIG employees shall be subject to Parish ordinances and policies in the same manner as if such policies were set forth herein.

The policies contained in this manual, and particularly this chapter, are not to be construed as a contract of employment, to create any such contractual obligations for the JPOIG or the parish, and do not create or abridge any rights otherwise provided by state or federal law. Nothing in these policies should be construed as a guaranty of any particular term or condition of employment or of any particular position or otherwise confer the expectation of continued employment.

¹⁵⁴ The term "JPOIG employee" and "JPOIG personnel" are used throughout and include: all full or part-time employees, detailed law enforcement officers, and interns (paid and unpaid). Detailed law enforcement officers are expected to be aware of JPOIG policies, but certain policies may not apply to them due to their collective bargaining agreement or departmental policies and procedures.

¹⁵⁵ "parish policy" means "Jefferson Parish Administrative Management Policies."



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Chapter 9 – Administrative Policies Section: 9-1 General Conduct Policies Subsection: 1 Gifts and Gratuity

AIG STANDARDS: AIG Quality Standards for Office – Independence
IIA STANDARDS: 1300 Quality Assurance and Improvement Program
PARISH ORDINANCE: JPCO §23-112
STATE LAW: La.R.S. 42:1111 *et seq*

I. INTRODUCTION

The Inspector General and JPOIG staff have a responsibility to maintain independence, so that opinions, conclusions, judgments, and recommendations will be impartial and will be viewed as impartial by knowledgeable third parties.¹⁵⁶

II. PURPOSE

The purpose of this section is to establish restrictions governing the receipt, solicitation or offering of anything of economic value, including but not limited to gifts, gratuity by JPOIG staff.

III. SCOPE

This section applies to all JPOIG staff.

IV. POLICY

- A. Receiving or soliciting gifts or gratuity from non-JPOIG staff, including Parish employees.
1. Definitions of the following terms apply throughout this policy:
 - a. “Gift” and “Gratuity” means anything of economic value for which the JPOIG staff did not earn or acquire by giving consideration at fair market value.¹⁵⁷
 - b. “Prohibited Source” means any individual or entity who (1) has or seeks to have a business, financial or contractual relationship with JPOIG; (2) who has a financial interest that may be affected by the performance or non-performance of the functions of JPOIG; (3) an elected official or employee of the parish or its special district; (4) an officer, member, agent or employee of an entity who receives funds through the parish.
 - c. “Relative” means the JPOIG staff’s spouse or domestic partner, the parents of the JPOIG staff and the JPOIG staff’s spouse or domestic partner, staff’s children and step-children, the staff’s

¹⁵⁶ AIG Quality Standards for Offices of Inspector General, Independence Subparagraph B.

¹⁵⁷ “Gift” or “Gratuity” does not include promotional items as defined by La.R.S. 42:1111 and interpreted by the Louisiana Board of Ethics. “Gifts” and “Gratuity” may include food and drink, whether or not consumed as a personal guest of the provider, when valued at greater than \$50.00 per individual for purposes of this policy. *See* La.R.S. 42:1115.1.

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siblings and the siblings of the staff's spouse or domestic partner; grandparents; other relatives living in the same household.

"Domestic partner" means an interpersonal relationship between two individuals who live together and share a common domestic life but who are not joined by marriage.

2. Except as otherwise provided, JPOIG staff may not:
 - a. Solicit or accept any gift or gratuity from any prohibited source as defined above;
 - b. Solicit or accept any gift or gratuity, anonymously, from any person or entity which the employee should reasonably believe to be a prohibited source; or
 - c. Solicit or accept any gift or gratuity for appearing or participating in speaking engagements, lectures, debates or organized discussion forums related to or which may be reasonably perceived to be related to duties and position with JPOIG.
3. JPOIG staff may accept gifts for special occasions unless otherwise prohibited by the state code of ethics.
4. Subject to the requirements of subsections (3), (5) and (6), the restrictions in subsection (A) do not apply to the following:
 - a. Any opportunity, benefit, loan or service that is available to the public on the same terms;
 - b. Anything for which the JPOIG staff gives consideration at fair market value;
 - c. Any gift from a personal friend, unless the employee should reasonably believe that such gift is related to staff's duties or position with JPOIG;
 - d. Any bequest, inheritance, or other transfer at death;
 - e. Awards for meritorious public service;
 - f. Any food, refreshment, lodging and transportation which would otherwise be permitted under state ethics laws;
 - g. Any food, refreshment, lodging, transportation, or other benefit resulting from outside business or employment activities of the JPOIG staff or staff's relative not prohibited by the state code of ethics.
 - h. Reasonable hosting, including travel and expenses, entertainment, meals or refreshment furnished in connection with meetings, public events, appearances or ceremonies related to official Parish business, if furnished by the sponsor of such meeting or public event and which would not otherwise violate state ethics code.
5. An JPOIG staff, nor any relative residing with the JPOIG staff, may accept anything of economic value as a gift or gratuity, or promise of future employment or benefit based upon an understanding or expectation, whether explicit or implicit, that the employee would perform or fail to perform duties associated with JPOIG.
6. Any JPOIG staff, nor any relative residing with the JPOIG staff, may accept anything of economic value as a gift or gratuity, or promise of

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future employment or benefit in return for advice or assistance on matters concerning the operation or business of the JPOIG or Parish.

B. Gifts among JPOIG staff

1. The following definitions apply to gifts among JPOIG staff:
 - a. “Supervisor” refers to the primary JPOIG staff member who is assigned to provide direction to another JPOIG staff member with respect to that staff member’s job duties and includes all other JPOIG staff in the ascending channel of administration up to and including the 1st Assistant Inspector General and Inspector General.
 - b. “Solicit” as used in this policy means to request contributions by personal communication or by general announcement.
 - c. “Voluntary contribution” as used in this policy means a contribution given freely, without pressure or coercion. A contribution is not voluntary unless it is made in an amount determined by the contributing JPOIG staff, except that where an amount for a gift is included in the cost for a luncheon, reception or similar event, an JPOIG staff who freely chooses to pay a proportionate share of the total cost in order to attend such event will be deemed to have made a voluntary contribution.
 - d. “Occasional” as used in this provision will be interpreted strictly to mean infrequent or irregular.
2. No supervisory JPOIG staff may solicit or accept anything of economic value as a gift or gratuity to or from a JPOIG staff within their channel of administration or supervision whether for the supervisor’s personal benefit or for the benefit of another.
3. No JPOIG staff may give anything of economic value as gift or gratuity, nor solicit another for such purposes, to any supervisor within their channel of administration or supervision except as specifically permitted herein.
4. Notwithstanding the above restrictions, the following is permitted:
 - a. On an occasional basis, including any occasion on which gifts are customarily given or exchanged, the following may be received and shared:
 - i. Food and drink;
 - ii. Personal hospitality at a residence which is of a type and value otherwise considered reasonable among friends; or
 - b. Voluntary gifts of reasonable value appropriate to an occasion may be given, shared or exchanged among employees irrespective of position within their channel of administration:
 - i. In recognition of special occasion of personal significance such as marriage, illness, or the birth or adoption of a child; or
 - ii. In recognition of a promotion, retirement, resignation, transfer, etc.

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V. PROCEDURE

A. Disposition of improper gifts

1. JPOIG staff who receive an improper gift do not violate this policy if the JPOIG staff promptly takes action to return the prohibited gift to its source and to notify legal counsel of the receipt of the gift and the action take to return it.
 - a. JPOIG staff returning an improper gift must do so as soon as possible along with a letter providing details of the time and place and manner in which the gift was provided and received, and indicating that the JPOIG gift policy prohibits the gift from being accepted.
 - b. Any gift consisting of a perishable item or any gift from an anonymous source must be donated to a not-for-prohibit charitable organization in the name of the person providing the gift or anonymously.
2. JPOIG staff may not take a tax deduction or other form of benefit for passive donation of such a prohibited gift or gratuity.

B. Reporting receipt of improper gift

1. JPOIG staff shall provide a copy of the letter returning the improper gift or written confirmation that the gift has been properly donated in accordance with this policy to legal counsel.
2. A copy of the letter returning the improper gift or written confirmation that gift has been properly donated in accordance with this policy shall be retained in the JPOIG staff member's personnel file.

APPROVED BY:



Kim Raines Chatelain
Inspector General

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Chapter 9 – Administrative Policies

Section: 9-1 General Conduct Policies

Subsection: 2 Non-Partisan and Non-Discriminatory

AIG STANDARDS: AIG Statement of Principles

IIA STANDARDS: N/A

PARISH ORDINANCE: JP Charter §4.09; JPCO §2-155.10

STATE LAW: N/A

I. INTRODUCTION

The JPOIG will adhere to the basic principles of integrity, objectivity, independence, professionalism, competence, courage, trust, honesty, fairness, forthrightness, public accountability and respect for others.¹⁵⁸

II. PURPOSE

The purpose of this section is to ensure equal opportunity for employment with the JPOIG, to make clear employees have the right to work free from discriminatory conduct, to define responsibilities for reporting violations of this section and to establish reporting procedures.

III. SCOPE

This section applies to all JPOIG staff.

IV. POLICY

- A. The JPOIG is a non-partisan, independent Parish department. Political affiliation and/or views will not be considered in hiring, assignment of work, performance evaluations or discipline (including termination).
- B. Equal employment opportunity as to age applies to persons who are age 18 or older. Federal and state law forbids the JPOIG from employment discrimination on the basis of age. The JPOIG is committed to the principles of equal employment opportunity/affirmative action in all areas of its employment process, including but not limited to recruitment, hiring, promotion, discipline, discharge and the awarding of benefits for all qualified individuals.
- C. Unlawful discrimination and/or discriminatory conduct is strictly prohibited in the workplace or in any work-related setting whether it be directed at a JPOIG staff member and whether it occurs among or between fellow staff members regardless of position.

¹⁵⁸ See AIG Standards, Statement of Principles for Offices of Inspector General. See also JPCO §2-155.10(13), Professional standards. Standards for initiating and conducting audits, investigations, inspections, and performance reviews by the office of inspector general will conform to the Principles and Standards of Offices of Inspectors General (Green Book) promulgated by the Association of Inspectors General.

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- D. Partisan or discriminatory factors will not influence the JPOIG actions, decisions or judgments concerning an investigation, audit, program review or recommendation for disciplinary or administrative actions.

V. PROCEDURE

- A. Race, color, religion, gender, marital status, age, national origin, ancestry, physical or mental disability, or veteran's status is not to be considered in any employment decision or service provided by the JPOIG.
- B. The JPOIG staff are not to be disadvantaged or discriminated against in compensation or other conditions of employment in violation of this section, and it will administer all personnel matters in accordingly.
- C. Physical capacity requirements relating to minimum standards for employment may be a reasonable selection factor. However, such standards will be reasonably necessary to the specific work to be performed and uniformly applied to all applicants for the particular position regardless of age or gender.
- D. JPOIG staff and applicants with disabilities
 1. Equal employment opportunity for persons with disabling conditions includes making a reasonable accommodation to known disabilities of a qualified disabled applicant or JPOIG employee who would be able to perform essential duties of the job if such reasonable accommodation was made.
 2. The American with Disabilities Act Amendments Act of 2008 (ADAAA) defines a disability as a physical or mental impairment that substantially limits one or more major life activities, has a record of such physical or mental impairment, or is regarded as having such impairment.¹⁵⁹
 3. A qualified individual with a disability is a person with (a) sensory, mental or physical condition that is medically diagnosable, (b) who satisfies the job requirements by educational background, employment experience, skills, licenses or any other qualification standards that are job related, (c) who is able to perform all functions that are essential to the job, with or without reasonable accommodation, and (d) who is able to meet the production and performance standard(s) for the position.
 4. Reasonable Accommodation
 - a. Qualified individuals with disabilities have the right to requires and receive reasonable accommodations in those aspects of employment that are considered necessary to perform the essential functions of the job.
 - b. An interactive process will be initiated when there is a request for an accommodation from an employee or applicant.
 - c. Requests for accommodation will be received by the JPOIG and forwarded to Parish Human Resource.

¹⁵⁹ 42 U.S.C. Section 12101 *et seq.*, generally. Louisiana employment discrimination law defines disability in a like manner as the ADAAA. La.R.S. 23:301-369.

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- d. The JPOIG will invite Human Resource to participate in an interactive process with the JPOIG staff member to reach a recommendation and appropriate accommodation.
 - e. Any initial information received from a JPOIG staff and a potential qualifying disability as well as any request for accommodation shall be documented and maintained in a confidential personnel file.
 - f. JPOIG staff who fail to provide necessary information may forfeit their eligibility for reasonable accommodation. The JPOIG assumes no obligation to create vacant positions, to offer reassignment to promotion positions or to waive job qualifications or essential functions in the accommodation process or to make any other non-reasonable accommodation.
- E. JPOIG staff responsibility
- 1. All JPOIG staff have an affirmative obligation to refrain from conduct which is contrary to this section.
 - 2. Each JPOIG staff has an affirmative obligation to thoroughly and impartially assist in any investigation or complaint of discriminatory conduct.
 - 3. All JPOIG staff have a right and a responsibility to report conduct with the JPOIG staff believes to violate this policy.
- F. Inspector General and Deputy Inspector General responsibilities
- 1. Each Deputy Inspector General has an affirmative obligation to ensure that discrimination is not practiced in the workplace or in the work-related settings and that there is full compliance with this Section by each JPOIG staff member under the supervision of the Deputy Inspector General.
 - 2. The Inspector General will take necessary and/or recommended action against JPOIG staff member who is shown to have violated this section.
- G. Complaints and reporting procedure
- 1. Violations of local, state, federal law or this section will not be tolerated and will constitute just cause for disciplinary action.
 - 2. JPOIG staff may make a complaint of violations to the staff member's supervisor and/or to the Inspector General.
 - 3. Complaints should be made in writing or otherwise appropriately documented.
 - 4. Every complaint of violation will be appropriately investigated, and where appropriate, the matter may be referred out for investigation.

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5. Applicants for employment with the JPOIG who wish to file a complaint for violations of this section may make a complaint to the Inspector General.

APPROVED BY:



Kim Raines Chatelain
Inspector General

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Chapter 9 – Administrative Policies

Section: 9-2 Recruitment and Retention of Employees

AIG STANDARDS: AIG Quality Standards for Office – Staff Qualifications, Paragraph A,

IIA STANDARDS: N/A

PARISH ORDINANCE: JP Charter §4.09; JPCO §2-155.10

STATE LAW: N/A

I. INTRODUCTION

OIG staff should collectively possess the variety of knowledge, skills and experience needed to accomplish its mission.¹⁶⁰

II. PURPOSE

The purpose of this section is to ensure that qualified candidates are considered for employment, successful candidates are adequately and fairly vetted and all appointments to employment with the JPOIG are made in a non-discriminatory manner.

III. SCOPE

This section applies to all JPOIG staff.

IV. POLICY

A. The JPOIG hiring process and practices shall adhere to applicable local, state and federal employment laws.

B. Open Positions/Job Announcement

1. Open positions for employment with the JPOIG will be posted on the JPOIG website.
2. Open positions for employment with the JPOIG may be advertised in newspapers, trade publications, or through other means.
3. Applications for open positions will be accepted for a period not less than two weeks absent exigent circumstances necessitating a shorter period of time.

C. Interviews

1. Qualified applicants will be considered for interview.
2. The JPOIG will select applicants for an interview based upon assessment of best qualified, qualified and least qualified applicants.

D. Appointment to Position/Notification of Selection

1. Applicants for employment should be notified in writing of their selection or non-selection for employment.

¹⁶⁰ AIG Quality Standards for Offices of Inspector General, Staff Qualifications, Subparagraph A.

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2. The JPOIG may make a preliminary offer of employment which is conditional on the results of the background investigation and pre-placement physical/drug screening.
- E. Background Checks
1. All JPOIG staff are subject to background checks prior to employment.
 2. JPOIG will, as part of background check, verify whether applicant has prior employment history with Jefferson Parish.
- F. Medical Examination/Drug Screening
1. All prospective JPOIG staff must undergo a pre-placement physical examination conducted by Parish-authorized physician(s) prior to employment with the JPOIG.
 2. All candidates for employment must also undergo a drug screening as outlined in the Jefferson Parish Substance Use Policy, prior to being hired by the JPOIG.
- G. “E-Verify”/I-9 Form
- JPOIG staff will complete employment verification I-9 process through Parish Human Resources.¹⁶¹
- H. Louisiana Driver’s license
1. All JPOIG staff must possess a valid Louisiana state driver’s license.
 2. JPOIG staff shall not operate any vehicle in the course and scope of employment with the JPOIG unless the staff member possesses a valid Louisiana driver’s license and any required endorsements.
 3. Suspension, revocation or disqualification of driver privileges may be cause of disciplinary action or termination.
- I. Professional License Requirement
1. Positions which require a professional license or certification shall only be occupied by individuals who maintain licensure and/or certification and who remain in good standing with the licensing body.
 2. Suspension, revocation or disqualification of professional license shall be cause for disqualification or other action, including termination or rescission of offer of employment.
- V. PROCEDURE
- A. Open Positions/Job Announcement
1. Job announcement for open positions with the JPOIG will incorporate approved position description. *See Appendix.*
 2. Job announcements will include required notices and disclaimers, including but not limited to:

¹⁶¹ JP Resolution 118097; Title IV, Subtitle A, of the Illegal Immigration Reform & Immigrant Responsibility Act of 1996, Pub. L. 104-208, 110 Stat. 3009, as amended (8U.S.C. §1324a note). *See also* Jefferson Parish Administrative Management Policies §202.3.

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- a. Applicants are subject to background checks;
 - b. Notice that JPOIG is an equal opportunity employment;
 - c. Notice that JPOIG complies with the American with Disability Act Amendments Act (ADAAA) and Louisiana state law against discrimination in its hiring practices.
3. Job announcement will clearly identify the opening and closing period for receipt of applications and provide directions on where and how to apply.
 4. JPOIG will maintain a record of job postings to include the job announcement and the date and place the announcement was advertised.
- B. Interviews
1. The JPOIG will endeavor to personally interview all best qualified candidates but may limit interviews to the top five best qualified candidates.
 2. Interviews may be in person or by telephone.
- C. Appointment to Position/Notification of Selection
1. Applicants selected for employment will be given a written offer of employment contingent upon satisfying pre-employment conditions to include but not be limited to:
 - a. Background check;
 - b. Medical Examination/Drug Screening;
 - c. Proof of valid driver's license; and
 - d. Verification of professional licensure, where applicable.
 2. Applicants not selected for employment
Applicants not selected for employment should be notified in writing that they were not selected for the position, "I would like to thank you for your recent interest in working for the Jefferson Parish Office of Inspector General. A decision has been reached to hire another qualified applicant. I wish you the best of luck in your career endeavors. Respectfully...."
- D. Background Checks
1. The JPOIG will conduct background checks of applicants during the normal employment process.
 2. All postings for open positions will include a notice that a background check is required prior to employment with the JPOIG.
 3. Successful applicants for positions will be required to sign a release.
 4. The results of the background investigation shall be maintained confidential unless disclosure is otherwise required by state or federal law.
- E. Medical Examination/Drug Screening
1. Once a tentative hiring decision has been made, the prospective staff must be informed that employment is contingent upon the prospective staff passing a pre-placement physical examination and drug screening.
 2. All original "Pre-Placement Physical Examination" shall be completed and forwarded to the Parish authorized physician.

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3. The JPOIG will await proceeding with employment until such time as the candidate successfully completes the entire pre-placement physical and the Human Resource Management – Substance Use Office notifies the JPOIG that a date of employment can be established.
 4. All medical records pertaining to the pre-placement physical will be kept in separate, confidential files maintained by the Parish Human Resource Manager – Substance Use Office.
 5. Any questions relating to pre-placement physical exam are to be directed to the Parish Human Resource Manager.
- F. “E-Verify”/I-9 Form
Newly retained JPOIG staff will complete the employment verification I-9 process through Parish Human Resources within the first three (3) days of employment.
- G. Driver’s License
1. Prior to employment, a successful applicant shall provide proof of a valid state driver’s license.
 2. Proof of a valid Louisiana driver’s license is to be provided within 30 days of employment.
 3. A copy of driver’s license will be maintained with employment record.
- H. Professional License Requirement
1. Prior to any offer of employment, a successful applicant for a position requiring a professional license or certification will be required to provide verification of good standing with licensing/certification authority.
 2. Verification of good standing at time of employment will be maintain as part of the applicant’s personnel file.

APPROVED BY:



Kim Raines Chatelain
Inspector General

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Chapter 9 – Administrative Policies

Section: 9-3 Separation from Employment

AIG STANDARDS: AIG Statement of Principles

IIA STANDARDS: N/A

PARISH ORDINANCE: JP Charter §4.09; JPCO §2-155.10

STATE LAW: N/A

I. INTRODUCTION

The JPOIG will adhere to the basic principles of integrity, objectivity, independence, professionalism, competence, courage, trust, honesty, fairness, forthrightness, public accountability and respect for others.¹⁶²

II. PURPOSE

The purpose of this section is to ensure the orderly separation of employment from the JPOIG.

III. SCOPE

This policy applies to all JPOIG staff.

IV. POLICY

- A. All employees serve at the will of the Inspector General and may only be terminated by the Inspector General.
- B. The resignation, retirement, or termination of an JPOIG staff member will be adequately documented, to include but not be limited to an exit interview with the JPOIG staff member.
- C. JPOIG will conduct an interview with separating staff member for the purposes of
 - (a) learning the circumstances and/or reason for which the individual is leaving JPOIG employment except in circumstances involving disciplinary termination;
 - (b) documenting via departing individual's own words the reason the individual is leaving JPOIG employment when separation is voluntary;
 - (c) identifying conflicts, disputes or problems which may require corrective action;
 - (d) to document positive or negative feedback relative to the employment experience;
 - (d) to provide individual security by providing terminated individual with the opportunity to voice complaint, and/or identify any employee who may verbalize or otherwise indicate a threat of violence;
 - (f) answer any questions the individual

¹⁶² See AIG Standards, Statement of Principles for Offices of Inspector General. See also JPCO §2-155.10(13), Professional standards. Standards for initiating and conducting audits, investigations, inspections, and performance reviews by the office of inspector general will conform to the Principles and Standards of Offices of Inspectors General (Green Book) promulgated by the Association of Inspectors General.

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may have regarding final pay, benefits and/or insurance; (g) inform individual on employment restrictions post government service.

V. PROCEDURE

A. Resignation

1. A staff member desiring to leave JPOIG employment shall normally submit a written resignation to the Inspector General at least fourteen calendar days prior to the effective date of the resignation.
2. Upon receipt of a notice of resignation, the Inspector General will forward a written notice to the staff member acknowledging the notice of intent to resign and any terms or conditions that need to be satisfied prior to the last day of employment.
3. At the direction of the Inspector General, the Administrative Assistant will complete an HR21 documenting the date of resignation.

B. Termination

1. JPOIG staff are subject to termination only by the Inspector General.
2. JPOIG staff will receive a written notice of termination which identifies the last day of employment. The individual should normally acknowledge receipt of notice of termination in writing.

C. Retirement

1. Upon receipt of a notice from an JPOIG staff member's intent to retire, the Inspector General, in conjunction with the Department of Human Resources, shall forward written notice of intent to retire and any terms or conditions that need to be satisfied prior to the last day of employment.
2. At the direction and upon the approval of the Inspector General, the Administrative Assistant will complete an HR21 documenting the date of retirement in consultation with the Department of Human Resources.

D. Exit Interview

1. The Inspector General or designee shall conduct the exit interview utilizing the JPOIG "Exit Interview" form. *See Appendix.* The form shall be retained in the employee's personnel file. A copy of the form may be provided to the employee upon request.
2. The exit interview will be conducted in connection with signing any necessary payroll documents, retirement documents, and retrieval of JPOIG/Parish identification, keys, parking card, computers, and any other JPOIG property.

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3. At the conclusion of the exit interview, the individual shall receive and acknowledge in writing the receipt of a “Post Employment” information sheet published by the Louisiana Board of Ethics *See Appendix, Post Employment Information Sheet.*

APPROVED BY:



Kim Raines Chatelain
Inspector General

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Chapter 9 – Administrative Policies

Section: 9-4 Staff Accountability

Subsection: 1 Work Schedule and Accountability

AIG STANDARDS: AIG Statement of Principles

IIA STANDARDS: N/A

PARISH ORDINANCE: JPCO §2-155.10(15)

STATE LAW: N/A

I. INTRODUCTION

As OIG is expected to exercise the same, or higher, level of prudence in utilizing the public's resources.¹⁶³ Achieving the mission of the JPOIG demands flexibility of work schedule but anticipates work to be accomplished in a regular work week. Thus, there is an attendant duty to reconcile operational needs with accountability for public resources.

II. PURPOSE

The purpose of this policy is to establish a regular work week for JPOIG employees and to provide a policy that permits flexibility of work schedule to ensure that operational needs of department are met with the greatest measure of efficiency in use of time

III. SCOPE

This policy applies to all JPOIG staff.

IV. POLICY

A. Standard Work Schedule

1. Staff are expected to work whenever required to satisfy needs of service, which sometimes requires irregular hours and days.
2. Subject to the needs the above, a regular work week for JPOIG the staff consists of not less than thirty-five (35) hours each week exclusive of meal period(s) and declared holidays.¹⁶⁴
3. A regular work week coincides with normal hours of office operations which is Monday through Friday 8:30 a.m. until 4:30 p.m.¹⁶⁵
4. The regular work week does not permit time to be "made-up" should the JPOIG staff fail to meet hours of work under regular work schedule, e.g.

¹⁶³ AIG Statement of Principles

¹⁶⁴ January 1 (New Year's Day); Mardi Gras, Good Friday, July 4 (Independence Day); First Monday in September (Labor Day), November 11 (Veteran's Day); Fourth Thursday in November (Thanksgiving Day); Fourth Friday in November (Day after Thanksgiving Day); December 25 (Christmas); any other holiday which may be declared by the Parish Council or the Parish President. Should any holiday fall on a day that is not a scheduled working day, then next following or immediately preceding working day, whichever is closer, shall be observed as a holiday. *See, generally* JPO No. 18483. Subject to authority conferred by JP Charter §4.09, *Inspector General* and JPCO §2-155.10(15).

¹⁶⁵ JPCO §2.155.10(15); JPOIG adopts Parish periods of payroll. A work week consists of seven (7) consecutive calendar days beginning at 12:01 on a Saturday and ending at 12:00 midnight on Friday.

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staff is not permitted to work solely for the purpose of “restoring” time lost due to absence from the job.

5. The JPOIG staff work week is subject to adjustment and modification by the supervisor to meet project assignments and operational needs and concerns. Here, “supervisor” refers to the principal staff member who is assigned to provide direction to with respect to performance of ordinary, work-related tasks, duties and responsibilities, or another staff member who shares in the provision of said direction up to and including the Inspector General.

B. Alternative Work Schedules

As operational needs demand, JPOIG staff may be called upon to work or otherwise be permitted to work an alternative work schedule when directed or approved by supervisor.

C. Availability Out-side Regular Work Schedule

1. JPOIG Executive Staff, to include 1st Assistant and Deputy Inspectors General, are subject to being contacted at any time and shall be responsive when contacted.
2. JPOIG staff may be required to be reachable out-side of regular hours. It is the responsibility of each Deputy Inspector General to communicate with each staff person who is required to be reachable out-side of regular hours via telephone or by electronic mail. JPIOG staff notified of such designation (may be on an operational basis) is responsible for checking devices at least once per day for communication, unless identified circumstances dictate greater availability.
3. This policy is not intended to impede travel out-side of regular work schedule and should not be interpreted to limit employee to a particular geographic region. Employee is encouraged to communicate to supervisor any travel which would prevent communication with the JPOIG.

V. PROCEDURE

A. Documenting Work Week -- Time Sheets

JPOIG staff will accurately report and attest to hours worked each pay period on the JPOIG “Bi-Weekly Time Sheet.” *See Appendix.*

B. Work Schedules

1. Supervisors will adjust work schedules where appropriate to achieve maximal efficiency of use of employee time. Supervisors are encouraged to work with staff for this same purpose. Alternative Work Schedules are not guaranteed.
2. It is the shared responsibility of staff to ensure that alternative work schedules are approved and fully documented.
3. Approval of alternative schedule does not diminish expectation and duty to work whenever and whatever hours are required to satisfy needs of service.

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- C. Availability Out-side Regular Work Schedule
JPOIG staff expected to be reachable out-side of regular work hours via phone or electronic mail should regularly check devices unless prior notice has been provided to the Inspector General that employee is unreachable.

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Kim Raines Chatelain
Inspector General

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Chapter 9 – Administrative Policies

Section: 9-4 Staff Accountability

Subsection: 2 Time and Attendance

AIG STANDARDS: AIG Statement of Principles
IIA STANDARDS: N/A
PARISH ORDINANCE: JPCO §2-155.10(15)
STATE LAW: N/A

I. INTRODUCTION

Accountability is a key to maintaining the public's trust.. The JPOIG is committed to maintaining accurate time and attendance records ¹⁶⁶

II. PURPOSE

The purpose of this policy is to establish the JPOIG system for maintaining accurate time and attendance records of all JPOIG employees.

III. SCOPE

This policy applies to all JPOIG staff.

IV. POLICY

A. Attendance

1. JPOIG staff have an obligation to correctly and accurately report and attest to hours worked each pay period on the prescribed JPOIG form.
2. Except as may be protected by applicable law or otherwise permitted by policy, staff shall maintain a pattern of regular and reliable attendance.
3. JPOIG staff shall report ready for work in a timely manner. The office shall be routinely staffed for normal operations from Monday through Friday 8:30 a.m. until 4:30 p.m.; however, employees are permitted to report from 7:30 a.m. to 9:30 a.m. to ensure operational flexibility. Staff reporting outside of these time shall do so only with supervisory notification and approval.
4. Staff reporting to work are expected to be at the office or on the job ready to begin work and shall normally remain on duty until the end of the work day.
5. Unless prior approval has been given by supervisor, JPOIG staff who for any reason fails to report to work shall immediately notify appropriate supervisor of the reason for the absence or tardiness.
6. Authorized absences shall be accounted and reported on prescribed form.
7. Unauthorized absences shall be considered an absence without approval and reported as "Absent Without Leave."

¹⁶⁶ AIG Statement of Principles.

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- B. Unearned Compensation
 1. Unearned compensation is a prohibited donation of public funds.¹⁶⁷
 2. Unearned compensation results from, but is not limited to, overpayment of wages, miscalculations of leave and erroneous refunds of deductions.¹⁶⁸
 3. JPOIG staff have an affirmative obligation to review wage statements for accuracy of accounting. Upon learning of an overpayment or possible overpayment, employee shall notify supervisor and JP Department of Accounting, Payroll Division and JP Human Resource by electronic mail with copies to 1st Assistant Inspector General and Inspector General.
 4. It is the joint and shared responsibility of employee and the JPOIG to work with JP Department of Accounting, Payroll Division and JP Human Resource to resolve any issue of unearned compensation.
 5. Recoupment of overpayments shall be in accordance with public policy per Administrative Management Policy.

V. PROCEDURE

- A. Documenting Work Week -- Time Sheets

JPOIG staff will accurately report and attest to hours worked each pay period on the JPOIG “Bi-Weekly Time Sheet.” *See* Appendix.
- B. Field work and Out of Office Meetings

JPOIG staff performing field or otherwise attending out-of-office meetings will document and note on the “Bi-Weekly Time Sheet”, where feasible, location and/or purpose of field work or out-of-office meeting, to include by way of example attending Council meetings, Board meetings, audit conferences, and the like.
- C. Unearned Compensation
 1. Notification to JPOIG staff

JPOIG staff is to be notified in writing immediately (verbally or in written or electronic form) if and when Parish Accounting determines that an overpayment has been made. If the initial notification is verbal, it must be followed with a written confirmation. The written notice and/or confirmation will include:

 - a. Pay date(s) on which the overpayment occurred;
 - b. Amount of overpayment;
 - c. Reason that overpayment occurred;
 - d. Plan of action for recoupment of overpayment;
 - e. Options for reimbursement of overpayment, as appropriate; and
 - f. Options for disputing any aspect of the overpayment.

¹⁶⁷ While La.R.S. 42:60 concerning recoupment of overpayments pertains to state employees, the statute is used as a guideline for local agencies to recover overpayments. La.R.S. 42:460 makes no reference to authorization by an employee. Recoupment of an overpayment is distinguishable from those payroll deductions contemplated by La.R.S. 42:456 which do require prior authorization by an employee. La. Atty. Gen. Op. 2007-0080 (12/14/2007).

¹⁶⁸ Deduction means any voluntary/involuntary reduction in gross pay (e.g. health insurance, taxes).

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2. Recoupment of overpayment

The amount to be recouped from any one paycheck cannot cause the staff's bi-weekly gross hourly wage to fall below the federal minimum wage without specific written approval from the staff member.

 - a. From current staff

Should an overpayment be discovered for a current JPOIG staff member, the procedures outlined above will be followed. Repayment options will include:

 - i. Direct deposit reversal; or
 - ii. One-time deduction from a subsequent paycheck; or
 - iii. Payment plan. Recurring deductions can be established for a period not to exceed 12 months. Any exceptions to the 12 month period must be approved by the Inspector General;
 - iv. Personal payment from the JPOIG staff member (e.g. check or money order). Prior approval for this method of payment must be obtained from Parish Accounting Director.
 - b. If a JPOIG staff member who is separating from employment has been overpaid, procedures should be employed to secure repayment including withholding amounts owed from final paycheck. If full amount is not recovered in final payment, the JPOIG will work with the Parish Accounting to following the procedures below.
 - c. From separated staff
 - i. One-time personal payment from the JPOIG staff member (e.g. check of money order), or
 - ii. Payment plan. The JPOIG staff member may submit multiple payments as agreed upon and the period of recoupment may not exceed 12 months.
 - iii. Should these procedures for recoupment of overpayment fail, then the JPOIG will refer the matter to the Parish Attorney for legal action.
3. Responsibilities
 - a. JPOIG staff should review pay statements at every pay period.
 - b. JPOIG staff have an affirmative obligation to report any underpayment or overpayment of compensation, to include accumulated leave and compensatory time.
 - c. Upon discovering an overpayment or underpayment, the JPOIG staff member must promptly notify the supervising Deputy Inspector General, Inspector General and Administrative Aide.
 - d. It is the shared responsibility of the affected JPOIG staff member, Inspector General and Administrative Aide to resolve the issue with Accounting in an expeditious and efficient manner.

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- e. It is the joint responsibility of the affected JPOIG staff member, Inspector General and Administrative Aide to maintain adequate documentation of the overpayment/underpayment and resolution/corrective action.

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Kim Raines Chatelain
Inspector General

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Chapter 9 – Administrative Policies Section: 9-4 Employee Accountability Subsection: 3 Compensatory Time

AIG STANDARDS: AIG Statement of Principles
IIA STANDARDS: N/A
PARISH ORDINANCE: JPCO §2-155.10(15)
STATE LAW: N/A

I. INTRODUCTION

As OIG is expected to exercise the same, or higher, level of prudence in utilizing the public's resources.¹⁶⁹ Achieving the mission of the JPOIG demands flexibility of work schedule but anticipates work to be accomplished in a regular work week. Thus, there is an attendant duty to reconcile operational needs with accountability for public resources.

II. PURPOSE

The purpose of this policy is to ensure that JPOIG staff are fairly compensated for hours worked and to otherwise ensure compliance with federal labor laws where applicable. Full time salaried staff must account for a minimum of 35 hours per week (inclusive of time worked and leave). The policy is not intended to alter in any way the expectation that JPOIG staff are to work whenever and whatever hours are required to satisfy needs of service, and by no means guarantees approval of compensatory time irrespective of hours worked unless otherwise required by federal labor laws.

III. SCOPE

This policy applies to all JPOIG staff.

IV. POLICY

A. Official duties of a time-sensitive nature may necessitate JPOIG staff work outside and in addition to regular hours of work for which staff may receive, but are not entitled to, compensatory time unless otherwise required by federal or state law.

B. Overtime

As a matter of policy, the JPOIG does not compensate staff with overtime pay for hours worked outside and in addition to regular hours of work. The JPOIG may compensate staff with compensatory time.

C. Compensatory time

1. "Compensatory time" means an arrangement by which eligible staff can receive time off in lieu of overtime pay.
2. JPIG staff may accrue compensatory time for hours actually worked in excess of 35 hours, exclusive of meal times, providing regular hours are

¹⁶⁹ AIG Statement of Principles

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accurately reported and additional hours are deemed essential to operations by the respective supervisor.

a. “Essential to Operations:” Supervisors may only approve compensatory time when the services rendered meet the following criteria:

- For the completion of tasks that are not related to the staff’s primary function of the positions (IT related work benefiting the office, media and website support, public speaking engagements), or
- If related to the primary staff function are of the nature that could not have been reasonably anticipated or scheduled (late meeting for which no notice was provided, surveillance, receipt of time sensitive actionable information, etc.).

3. JPOIG staff are not entitled to monetary compensation for any unused compensatory time unless otherwise required by state or federal law. Any compensatory time which is not used in compliance with this policy shall be loss.

D. Accrual and approval of compensatory time

1. All compensatory time earned shall be recorded and approved via the JPOIG leave slip. Compensatory time may only accrue under the following conditions. Absent these conditions, staff will not be compensated for additional hours worked.
 - a. JPOIG staff is called upon by supervisor to work hours beyond and in addition to regular hours of work which are 8:30 a.m. until 4:30 p.m. to complete a time-sensitive project or otherwise meet operational concerns.
 - b. JPOIG staff has maintained an accurate record of all hours worked, and employee actually works greater than thirty-five (35) hours, exclusive of meal periods and use of other leave and the additional hours have been deemed operationally essential.
 - c. Accrual of compensatory time cannot otherwise be avoided by adjusting or modifying a work schedule given the current operational needs or concerns of the department and which would dictate additional work hours by employees.
2. Compensatory time may only be accrued upon the approval of and accompanying valid signature of the respective supervisor on the affected staff member’s Bi-Weekly Time Sheet. Here, “supervisor” means Inspector General in case of 1st Assistant Inspector General and Deputy Inspectors General, and it means Deputy Inspector Generals in the case of persons directly under their respective supervision.
3. JPOIG staff may accrue up to but not exceed eighty (80) hours of compensatory time which shall be used in the manner prescribed below.

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- E. Use of compensatory time
 1. JPOIG staff shall use compensatory time before annual leave, but may utilize compensatory time and annual leave consecutively.
 2. JPOIG staff must request use of compensatory time in writing. If utilizing compensatory time and annual leave consecutively, requests for leave shall be made separately and for specified days and/or hours.
 3. It is the shared responsibility of JPIOG staff and supervisor to ensure that use of compensatory time authorized and accurately reported.
 4. It is the shared responsibility of each JPOIG staff to ensure that use of compensatory time authorized and accurately reported.¹⁷⁰

V. PROCEDURE

- A. Compensatory time earned
 1. JPOIG staff requesting compensatory time must give notice via electronic mail to the Inspector General, with copy to Administrative Aide.
 2. Compensatory time must be approved by supervising Deputy Inspector General or Inspector General.

- B. Compensatory time used
 1. JPOIG staff seeking time-off may request to use accumulated compensatory time by giving notice via electronic mail to Inspector General, with copy to Administrative Aide.
 2. Compensatory time shall also be reported on employee Time and Attendance Sheet for the effected pay period.
 3. Accumulated compensatory must be verified through payroll before request is submitted for approval.
 4. If utilizing compensatory time and annual leave consecutively, requests for leave shall be made separately and for specified days and/or hours.
 5. Use of compensatory time by JPIOG staff must be approved by Deputy Inspector General.
 6. Use of compensatory time by 1st Assistant Inspector General or Deputy Inspector General must be approved by Inspector General.
 7. Use of compensatory time by Inspector General must be approved by the 1st Assistant Inspector General.

¹⁷⁰ See JPCO §2.155.10(15).

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- C. Records of compensatory time requested and used shall be maintained within JPOIG personnel files.

APPROVED BY:



Kim Raines Chatelain
Inspector General

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Manual of Policies and Procedures

Chapter 9 – Administrative Policies

Section: 9-4 Employee Accountability

Subsection: 4 Annual Leave and Leave Reimbursement

AIG STANDARDS: AIG Statement of Principles

IIA STANDARDS: N/A

PARISH ORDINANCE: JPCO §2-155.10(15)

STATE LAW: N/A

I. INTRODUCTION

Accountability is a key to maintaining the public's trust.¹⁷¹ The JPOIG is committed to maintaining accurate time and attendance records. JPOIG staff may earn annual leave in tandem with regular hours work. This leave shall be earned and reimbursed in a like manner to Parish employees in the unclassified service. Adoption by JPOIG of the Parish's leave policies for unclassified employees should not be misconstrued as an abrogation of authority conferred upon the Inspector General to establish personnel procedures, but an acknowledgment that consistency with regard to benefits is in the best interest of JPOIG staff without compromising the independence of the department.

II. PURPOSE

This purpose of this policy is to generally set forth leave benefits of JPOIG staff, which benefits are like those of Parish employees of the unclassified service, approved by ordinance of the Parish Council.¹⁷²

III. SCOPE

This policy applies to all JPOIG staff.

IV. POLICY

A. Annual Leave, Accrual

1. JPOIG executive staff, staff auditors and staff investigators will be advanced 13 days of annual leave upon employment against which earned leave will subsequently be charged. Executive staff includes the Inspector General, the 1st Assistant Inspector General, and the Deputy Inspector Generals. After the initial twelve (12) month period, all career JPOIG employees shall earn leave as provided below.
2. JPOIG staff shall earn and accumulate Annual Leave with pay as follows:
 - a. Staff with fewer than five (5) years of continuous service shall accumulate at the rate of one-half (1/2) of a working day per bi-weekly pay period worked;
 - b. Staff with more than five (5) years but fewer than ten (10) years of continuous service shall accumulate at a rate of five-eighths (5/8) of a working day per bi-weekly pay period worked;

¹⁷¹ AIG Statement of Principles

¹⁷² JPCO §2.155.10(15); *see source generally* JPO No. 18483, Jefferson Parish Executive Pay Plan.

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- c. Staff with ten (10) or more years of continuous service shall accumulate at the rate of three-quarters (3/4) of a working day per bi-weekly pay period worked;
 - d. Unused annual leave shall be accumulated for each staff member and shall be carried forward from one calendar year to the next; however, the maximum amount of accumulated leave which may be carried over is forty (40) days.
 3. Staff shall be entitled to use at least the amount of leave accumulated during that calendar year and may, with approval of supervisor, use any amount not in excess of the total accumulated and unused. Leave may only be used at the time or times approved by supervisor, based upon the operational needs of the department.
 4. Staff shall be permitted to use accumulated Annual Leave in case of illness where all accumulated Sick Leave has been used.
 5. The Inspector General may grant staff Leave Without Pay for a period not to exceed an aggregate of ninety (90) working days within a period of twelve (12) consecutive months, whenever such leave is considered to be in the best interest of the service.
 6. Staff shall not accrue Annual Leave for any bi-weekly pay period when on Leave Without Pay or is Absent Without Leave for more than one (1) working day.
 7. Staff shall be permitted to use accumulated Annual Leave in order to comply with Family and Medical Leave Act of 1993, as amended. Absence from service which is covered under Family and Medical Leave Act of 1993, as amended, shall be reported as such on Leave request.
- B. Annual Leave, Earned and Unused
1. Upon termination of employment, staff may be compensated for accumulated, unused annual leave, if funds are available, in the manner set forth herein.
 2. Under no condition shall the compensation of accumulated, unused annual leave be considered as salary or wages for work performed, for purposes of retirement benefit computation, or for any other purpose; the compensation being merely a payment of the terminal leave benefit.
 3. Unused Annual Leave shall be compensated at the rate of pay in effect at the time the leave accrued. In determining compensation, leave is presumed to be used in the order in which it accrues.
 4. For budgetary purposes, requests for compensation must be submitted to the Inspector General, or his designee, in writing not later than October 1 of the year preceding the year in which compensation is anticipated. Compensation may be denied by the Inspector General in any case in which such request is not timely submitted.
 5. Upon termination of employment, death or entry into active duty with Armed Forces of the United States, the employee shall be paid for all unused Annual Leave accrued to the employee's credit subject to the following:

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- a. Staff are not under any circumstances entitled to be compensated for accumulated leave in excess of 20 days or 140 hours, whichever is the greater.
- b. Staff who are granted advanced leave upon employment and employment terminates within first twelve months and before leave is earned shall reimburse the JPOIG the difference between leave earned and leave used except and unless in the event of death of the employee.
- c. Staff who terminate service with JPOIG without giving at least ten (10) working days' notice may not be paid any unused accumulated Annual Leave less than ten (10) days or seventy (70) hours except in the case of good cause shown by staff for failing to give notice and at the discretion of the Inspector General.
- d. Staff whose service with JPOIG is terminated by the Inspector General shall be compensated for unused, accumulated leave in accordance with this policy except that the JPOIG may withhold payment in any amount necessary to offset the cost to the JPOIG for damages which may have been caused by staff or for failure of staff to return in good condition any JPOIG property, including but not limited to JPOIG equipment, and materials which were issued or entrusted to employee's care and control.

V. PROCEDURE

- A. Annual leave used, request for leave
 1. JPOIG staff seeking time-off may request to use accumulated leave by giving notice via electronic mail to Inspector General, with a copy to the Administrative Aide.
 2. Accumulated leave must be verified through payroll before request is submitted to for approval.
 3. If utilizing compensatory time and annual leave consecutively, requests for leave shall be made separately and for specified days and/or hours.
 4. Use of compensatory time by JPIOG staff must be approved by supervising Deputy Inspector General.
 5. Use of compensatory time by 1st Assistant Inspector General or Deputy Inspector General must be approved by Inspector General.
 6. Use of compensatory time by Inspector General must be approved by the 1st Assistant Inspector General.
- B. JPOIG staff shall request use of Annual Leave via electronic mail to Inspector General, with copy of Administrative Adie. Leave shall also be reported on employee Time and Attendance Sheet for the effected pay period.
- C. Leave shall also be reported on employee Time and Attendance Sheet for the effected pay period.

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- D. Records of Annual Leave used shall be maintained within JPOIG personnel files.¹⁷³

APPROVED BY:



Kim Raines Chatelain
Inspector General

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¹⁷³ JPCO §2-155.10(15); *see source, generally*, JPO No. 18483, Jefferson Parish Executive Pay Plan



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Chapter 9 – Administrative Policies Section: 9-4 Employee Accountability Subsection: 5 Sick Leave

AIG STANDARDS: AIG Statement of Principles
IIA STANDARDS: N/A
PARISH ORDINANCE: JPCO §2-155.10(15)
STATE LAW: N/A

I. INTRODUCTION

Accountability is a key to maintaining the public's trust.¹⁷⁴ JPOIG employees may earn sick leave in tandem with regular hours work. This leave shall be earned and reimbursed in a like manner to Parish employees in the unclassified service. Adoption by JPOIG of the Parish's leave policies for unclassified employees should not be misconstrued as an abrogation of authority conferred upon the Inspector General to establish personnel procedures, but an acknowledgment that consistency with regard to benefits is in the best interest of JPOIG employees without compromising independence of department.

II. PURPOSE

This purpose of this policy is to generally set forth leave benefits of JPOIG employees, which benefits are like those of Parish employees of the unclassified service, approved by ordinance of the Parish Council.¹⁷⁵

III. SCOPE

This policy applies to all JPOIG staff.

IV. POLICY

A. Sick Leave, Accrual

1. JPOIG staff shall be advanced 13 days of sick leave upon employment against which earned leave will subsequently be charged. After the initial twelve (12) month period, all career JPOIG staff shall earn leave as provided below.
2. JPOIG staff earn and accumulate Sick Leave at the rate of one-half (1/2) of a working day, or 3.5 hours, per bi-weekly pay period worked.
3. Central payroll's records, which are maintained by the Parish Payroll Department, shall be used in determining and recording Sick Leave. Use of Sick Leave shall be reported to the Parish Payroll Department.
4. The Inspector General may grant staff Leave Without Pay for a period not to exceed an aggregate of ninety (90) working days within a period of twelve (12) consecutive months, whenever such leave is considered to be in the best interest of the service.

¹⁷⁴ AIG Statement of Principles

¹⁷⁵ JPCO §2-155.10(15), *see source, generally* JPO No. 18483.

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5. Staff shall not accrue Sick Leave for any bi-weekly pay period during which the employee is on Leave Without Pay or is Absent Without Leave for more than one (1) working day.
6. Staff shall be permitted to use accumulated Sick Leave in order to comply with Family and Medical Leave Act of 1993, as amended. Absence from service which is covered under Family and Medical Leave Act of 1993, as amended, shall be reported as such on Leave request.

B. Sick Leave: Earned and Unused

1. Earned and accumulated Sick Leave may be carried forward from one year to the next if unused without limitation.
2. All unused Sick Leave will remain to the JPOIG staff's credit as long as the JPOIG staff remains within the service of the Parish, including but not limited to that of the JPOIG.
3. All unused Sick Leave shall remain to the JPOIG staff's credit during any period of absence due to Military Leave
4. After having attained seven (7) years of creditable service to qualify for a current or deferred retirement benefit under the Parochial Employee's Retirement system and/or the Employee's Retirement System of Jefferson Parish, an employee who voluntarily terminates Parish service, including but not limited to service in the JPOIG, may be compensated up to but not more than forty (40) days or 280 hours, whichever is the lesser.
5. All unused Sick Leave credits shall be certified to the retirement system for credit as provided by applicable law. To this end, JPOIG staff may waive the entitled payments for Sick Leave credits.
6. Sick Leave credits to be reimbursed or certified as provided herein shall be limited only to that Sick Leave which is earned under provisions of this rule. No such payment or certification shall be made for any other Sick Leave advanced or bestowed under any other authority.¹⁷⁶

V. PROCEDURE

A. Sick leave used, request for leave

1. JPOIG staff seeking time-off may request to use accumulated leave by giving notice via electronic mail to the Inspector General, with a copy to the Administrative Aide.
2. Accumulated leave must be verified through payroll before request is submitted to for approval.
3. If utilizing compensatory time and annual leave consecutively, requests for leave shall be made separately and for specified days and/or hours.
4. Use of compensatory time by JPIOG staff must be approved by the supervising Deputy Inspector General.
5. Use of compensatory time by 1st Assistant Inspector General or Deputy Inspector General must be approved by Inspector General.
6. Use of compensatory time by Inspector General must be approved by the 1st Assistant Inspector General.

¹⁷⁶ Source JPO 18483, Jefferson Parish Executive Pay Plan

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- B. JPOIG staff shall request use of Sick Leave by sending electronic mail to Inspector General, with copy to Administrative Aide.
- C. Leave shall also be reported on employee Time and Attendance Sheet for the effected pay period.
- D. Records of used Sick Leave shall be maintained within JPOIG personnel files.
- E. JPOIG staff shall furnish notice or report to supervisor, as appropriate, of the need for and cause of absence from work due to staff's illness or injury, unrelated to employment, and when appropriate, the prognosis. Sick Leave may only be used due to illness or injury suffered by staff or staff's immediate family and which is unrelated to employment. "Immediate family" for purposes of leave includes employee's parents, parents of spouse, employee's grandparents, siblings and spouses of siblings, spouse's siblings and their spouses, children and spouses of children, employee's and spouse's step-parents, and employee's and spouse's step-children.
- F. It is the responsibility of the supervisor to approve Sick Leave, and forward original signed and approved Sick Leave notice to 1st Assistant Inspector General.
- G. Records of Sick Leave used shall be maintained within JPOIG personnel files.¹⁷⁷

APPROVED BY:



Kim Raines Chatelain
Inspector General

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¹⁷⁷ JPCO §2-155.10(15); *see source, generally*, JPO 18483, Jefferson Parish Executive Pay Plan



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Chapter 9 – Administrative Policies Section: 9-4 Employee Accountability Subsection: 6 Other Leave

AIG STANDARDS: AIG Statement of Principles
IIA STANDARDS: N/A
PARISH ORDINANCE: JPCO §2-155.10(15)
STATE LAW: N/A

I. INTRODUCTION

Accountability is a key to maintaining the public's trust.¹⁷⁸ JPOIG employees may take leave with or without pay. This leave is to ensure compliance with applicable law. This leave shall be earned and reimbursed in a like manner to Parish employees in the unclassified service. Adoption by JPOIG of the Parish's leave policies for unclassified employees should not be misconstrued as an abrogation of authority conferred upon the Inspector General to establish personnel procedures, but an acknowledgment that consistency with regard to benefits is in the best interest of JPOIG employees without compromising independence of department.

II. PURPOSE

This purpose of this policy is to generally set forth leave benefits of JPOIG employees, which benefits are like those of Parish employees of the unclassified service, approved by ordinance of the Parish Council.¹⁷⁹

III. SCOPE

This policy applies to all JPOIG staff.

IV. POLICY

A. Civil Leave

1. JPOIG staff shall be given paid time off when:
 - a. Performing jury duty;
 - b. Subpoenaed to appear before a court, public body, commission, or board in a capacity other than as a party to a cause or action;
 - c. Performing emergency civilian duty in connection with national defense;
 - d. Ordered to appear for a medical or other examination by the Selective Service System or by a branch of the Armed Forces of the State or the United States;
 - e. Voting or serving as an election official in either a primary, general, or special election in Jefferson Parish.
 - f. Taking an examination for licensure or credentialing that will benefit the JPOIG if approved in advance.

¹⁷⁸ AIG Statement of Principles

¹⁷⁹ ; JPCO §2-155.10(15), *see source, generally* JPO No. 18483.

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2. When staff is authorized or assigned to attend a convention, a conference, or a training program directly related to staff's position or to the functions and operations of JPOIG, staff shall be considered on duty and no leave shall be reported for or charged against the employee.
- B. Funeral Leave
1. When there is a death within staff's immediate family, the JPOIG staff member may take two (2) days of leave which shall not be charged to Annual or Sick Leave. "Immediate family" for purposes of leave includes employee's parents, parents of spouse, employee's grandparents, siblings and spouses of siblings, spouse's siblings and their spouses, children and spouses of children, employee's and spouse's step-parents, and employee's and spouse's step-children.
 2. Employee shall furnish notice of the need for absence, including the relationship of the deceased and such other information as may reasonably be required to justify the leave requested.
- C. Paternal Leave
1. Regular staff who have been employed with Jefferson Parish for a period of at least one (1) year, including but not limited to employment with the JPOIG, shall be eligible for Parental Leave. The JPOIG staff is required to present a statement from a physician, adoption agency, or another verification requested by the Inspector General that is reasonable and necessary to confirm eligibility. Parental leave shall be recorded as paid leave in addition to the staff member's accumulated sick leave, annual and compensatory leave.
 2. Childbirth leave may be for up to four (4) consecutive weeks of Parental Leave taken for childbirth beginning the day following the birth of a child/children for the purposes of recovering from pregnancy and childbirth. The JPOIG staff may return to work any time following the childbirth provided that she has the permission of her attending physician. A statement from the physician certifying that the employee is able to resume her duties is required. In addition to the Parental Leave provided herein, the JPOIG staff who has given birth to a child/children shall be eligible for additional Parental Leave as provided in the section below. .
 3. Child Bonding leave for all but the birth mother may be for up to two (2) consecutive weeks of Parental Leave beginning the day following the birth of a child/children, the child/children's first release from a medical facility, or immediately following the placement of the child/children with the JPOIG staff for adoption. Child Bonding leave for the birth mother begins at the conclusion of Childbirth leave. In order to qualify, the JPOIG staff must meet one of the following criteria:
 - a. Have given birth to the child/children
 - b. Be the spouse of a person who has given birth to a child/children;
 - c. Be the biological father of the newborn child/children, or;
 - d. Be the adoptive parent of a child under five (5) years of age.

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4. The JPOIG staff shall be required to use appropriate accumulated paid leave for any other leave utilized for the birth or adoption of a child. The Inspector General may grant Leave without Pay in the event that all paid leave has been exhausted. The JPOIG staff who are eligible for leave under this section are eligible for participation in the Voluntary Leave Transfer Policy.
5. Parental Leave may not be used by the JPOIG staff more than once in any twelve (12) month period. The twelve (12) month period shall be computed using a rolling twelve (12) month period measured backwards from the first date leave is used. If multiple children are born/adopted, the event shall be considered a single qualifying event.
6. Childbirth leave and Child Bonding leave shall be for a continuous period of four (4) week and two (2) week period, respectively. The leave shall not be used on an intermittent basis. No other forms of leave (including but not limited to: Annual Leave, Sick Leave, Civil Leave, Non-Declared Emergency Leave, Declared Emergency Leave, Leave Without Pay, Military Leave, Holidays, Funeral leave, and Donated leave) shall extend and/or interrupt the continuousness of the applicable Parental Leave.
7. The provisions of the Family Medical Leave Act (FMLA) apply to Parental Leave. The JPOIG staff on approved Parental Leave shall be reinstated to the staff member's former position, or a comparable position in supervisory and duty responsibilities at the same pay, upon return to work within the twelve (12) weeks provided by FMLA. Any and all Parental Leave shall run concurrently with leave under the FMLA.

D. Leave Of Absence Without Pay

Inspector General may grant an employee Leave Without Pay for a period not to exceed an aggregate of ninety (90) working days within a period of twelve (12) consecutive months, whenever such leave is considered to be in the best interest of the service of JPOIG.

E. Family and Medical Leave

Employee shall be entitled to and shall be granted Sick Leave, Annual Leave, and/or Leave Without Pay for Family and Medical Leave purposes in order to comply with the Family and Medical Leave Act of 1993, as amended.

V. PROCEDURE

- A. JPOIG staff shall request use of Leave via electronic mail to Inspector General, with copy to Administrative Aide.
- B. Leave shall also be reported on employee Time and Attendance Sheet for the effected pay period.

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- C. Records of used Leave shall be maintained within JPOIG personnel files.
- D. The JPOIG staff shall furnish notice or report, as appropriate, to the staff's immediate supervisor of the need for and cause of absence from work due to staff's illness or injury, unrelated to employment, and when appropriate, the prognosis.
- E. Records of Leave used shall be maintained within JPOIG personnel files.¹⁸⁰

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Kim Raines Chatelain
Inspector General

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¹⁸⁰ JPCO §2-155.10(15); *see source, generally*, JPO No. 18483, Jefferson Parish Executive Pay Plan



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Chapter 9 – Administrative Policies Section: 9-4 Employee Accountability Subsection: 7 Personal Property

AIG STANDARDS: AIG Statement of Principles
IIA STANDARDS: N/A
PARISH ORDINANCE: JPCO §2-155.10(15)
STATE LAW: N/A

I. INTRODUCTION

Offices of Inspector General are expected to exercise the same, or higher, level of prudence in utilizing the public's resources.¹⁸¹ Operational efficiency of the JPOIG demands both flexibility and accountability. The JPOIG will provide employees with essential supplies and equipment necessary to perform their official duties. However, the JPOIG may compensate employees for the use of personal property in the course and scope of employment.¹⁸²

II. PURPOSE

The purpose of this policy is to set forth guidelines and expectation of employees regarding personal property and associated compensation.

III. SCOPE

This policy applies to all JPOIG staff.

IV. POLICY

A. Personal Vehicles, allowance

1. JPOIG staff may be expected to travel in order to perform official duties for the JPOIG. Employee shall maintain a valid Louisiana driver's license at all times.
2. JPOIG staff receiving monthly allowance for travel will not be reimbursed for travel in the absence of an extenuating and documented cause.
3. JPOIG staff receiving compensation for travel and use of personal vehicle shall maintain and provide proof of current, liability insurance as required by state law.
4. Monthly allowance shall be suspended whenever the employee fails to maintain or provide proof of insurance or is on extended leave of absence from duty for a period in excess of thirty (30) days.¹⁸³

B. Personal cell phone, allowance

1. JPOIG staff are expected to work whenever required to satisfy needs of

¹⁸¹ AIG Statement of Principles.

¹⁸² JPCO §2.155.10(15); *see source generally* JPO No. 18483, Jefferson Parish Executive Pay Plan.

¹⁸³ *See* JPCO §23-60 et seq.

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service, and employees are expected to be readily accessible outside of regular working hours or when working out-of-office.

2. JPOIG staff must be available and on-call for duty as needed.
3. JPOIG staff are required, as a condition of employment, to secure and maintain a cellular mobile device by which JPOIG staff may be reached by the JPOIG and through which JPOIG staff can receive electronic mail.
4. JPOIG staff's cell phone is personal property, and neither the JPOIG nor the Parish, will compensate the JPOIG staff for the acquisition, loss or damage to the cellular phone whether or not such loss or damage occurs in the course and scope of job duties, nor does the JPOIG or the Parish assume any responsibility or liability for contractual obligations assumed by JPOIG staff in connection with cellular service.
5. JPOIG information and data which may be accessed or transmitted via cellular phone shall be considered as confidential and privileged as if such material were accessed through JPOIG information and technology equipment. Staff should assume that data created, captured, transmitted or stored on cellular phone may be subject to disclosure insofar as data created, captured, transmitted or stored is related or reasonably related to employment with the JPOIG.

C. Other personal property

1. Personal property or equipment should not be used in lieu of JPOIG property absent express permission.
2. Personal property, absent the above, should not be used or relied upon to perform job duties for the JPOIG.
3. Personal property should not be stored at the JPOIG absent express authorization from the Inspector General.

V. PROCEDURE

A. Personal Vehicles, allowance

1. Employees may be compensated for necessary travel in one of two ways: (1) staff will be compensated monthly for documented travel at the current mileage allowance used by the Internal Revenue Service; (2) staff may receive a monthly allowance for travel.
2. Allowance shall be determined at time of employment and shall be considered a benefit related to service for JPOIG.

B. Personal cell phone, allowance

1. JPOIG staff will secure and maintain a reliable, cellular mobile device by which JPOIG staff may be reached by the JPOIG and through which JPOIG staff can receive electronic mail.
2. JPOIG staff shall utilize protocols outlined in the JPOIG's Information and Electronic Data policy, where appropriate, to safeguard and protect the access, receipt or transmission of JPOIG data and information by cellular device including but not limited to:
 - a. password protecting the cellular phone;

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- b. limiting access and use of the cellular phone by another; and
 - c. leaving cellular phone unsecure and unprotected.
 - 3. JPOIG staff will receive a monthly allowance for complying with policy, said allowance shall be considered a benefit related to service for JPOIG.
 - 4. The amount of the allowance shall be determined at the time of employment.
 - 5. The allowance shall be suspended whenever the employee is on extended leave of absence from duty for a period in excess of thirty (30) days.
- C. Other personal property
- 1. Written authorization from the Inspector General Personal is required if situating personal property at the JPOIG.
 - 2. Employee will not be compensated for the use, damage or loss of personal property under any circumstances whether or not such use was permitted by the JPOIG.

APPROVED BY:



Kim Raines Chatelain
Inspector General

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Manual of Policies and Procedures

Chapter 9 – Administrative Policies

Section: 9-4 Employee Accountability

Subsection: 8 IT Equipment and Electronic Data

AIG STANDARDS: N/A

IIA STANDARDS: N/A

PARISH ORDINANCE: JPCO §2-155.10(15)

STATE LAW: N/A

I. INTRODUCTION

Offices of Inspector General are expected to exercise the same, or higher, level of prudence in utilizing the public's resources. Employees will be assigned or have access to information technology (IT) resources and equipment necessary to perform job duties. Fact finding and gathering of information is integral to the JPOIG's operations. It is incumbent upon the employee to protect the propriety of facts and information gathered, stored and/or accessed through technology.

II. PURPOSE

The purpose of this policy is to provide strict guidelines regarding the use of JPOIG and/or Parish technology and communication systems, to provide strict guidelines regarding computers, storage devices, and/or mobile devices (including, but not limited to, smart phones tablets and other mobile devices) present at the work place, whether or not such equipment is owned by the JPOIG or the Parish, which may be used to access JPOIG or Parish information technology or is otherwise supported by JPOIG's network system, including internet access.

III. SCOPE

This policy applies to all JPOIG staff.

IV. POLICY

A. Policy Definitions

1. Information technology: the technology involving the development, maintenance and use of computer systems, software and networks for the processing and storing of data.
2. Electronic data: information and data created developed, processed, accessed, or stored in the course of official JPOIG work (e.g. documents, spreadsheets, email).
3. Information technology and electronic data equipment: Computer hardware and software, recording, and storage devices and cards acquired and maintained by or on behalf of the JPOIG that supports the use of technology by the JPOIG and includes, but is not limited to, computers, tablets, printers, scanners, cell phones, data storage devices and cards, peripheral devices servers, routers and switches or evolving technologies that perform or replace the functions performed by such IT equipment.

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4. Personal technology and electronic equipment: Computer hardware and software, recording and storage devices personally acquired and maintained by JPOIG employees and includes, but is not limited to, personal computers, tablets, cell phones, data storage devices and cards, digital cameras.
- B. JPOIG Information and technology equipment, assigned
1. JPOIG information and technology equipment shall be acquired by, or upon, the authorization of the Inspector General or designee, and shall be installed, configured and inventoried upon acquisition in accordance with parish policy.
 2. JPOIG information and technology equipment is for the effective and efficient operation of the JPOIG and those uses related to JPOIG employment. Use of JPOIG information and technology equipment for strictly personal reasons is prohibited.
 3. JPOIG staff may be assigned as primary user of specific information and technology equipment, such as desktop, laptop, tablet and printer, etc. JPOIG staff shall sign for each item of equipment, and shall maintain care, custody and control of the equipment until time as the equipment is returned to JPOIG. JPOIG staff may be held liable for loss or damage to equipment resulting from employee's failure to adequately guard against damage or loss, regardless of the reason or circumstance.
 4. JPOIG Staff may be assigned temporary use of specific information and technology equipment, such as cameras and storage devices. Employees shall sign for each item of equipment, and shall maintain care, custody and control of equipment until such time as the item is returned to JPOIG inventory for use by another employee. Employees may be held liable for loss or damage to equipment resulting from employee's failure to adequately guard against damage or loss, regardless of the reason or circumstance.
 5. Loss or damage to information and technology equipment, including but not limited to a reasonable belief that integrity or stability of technology has been compromised, shall be immediately reported in writing to supervising Deputy Inspector General with a copy to legal counsel.
 6. JPOIG staff shall upon returning information and technology equipment to the JPOIG inspect and verify that equipment is returned in substantially the same condition as first assigned to the JPOIG employee. Receipt or return of equipment shall be verified by employee and supervising Deputy Inspector General
 7. The JPOIG separately or through the Parish has licensed the use of certain commercial software application programs for JPOIG purposes. Third parties retain the ownership and distribution rights to such software. No employee may create, use or distribute copies of such software in a manner which does not comply with applicable licensing agreement or otherwise violates the terms of the license agreement.

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- C. JPOIG Information and technology equipment, uses
1. Uses. All forms of data created, entered, shared, transmitted, received or stored using JPOIG information and technology equipment is subject to being monitored, viewed or released except as may be otherwise prohibited or provided by law.
 2. No expectation of privacy. JPOIG staff should assume that all forms of data created, entered, shared, transmitted, received or stored using JPOIG information and technology equipment will be monitored and viewed. JPOIG staff using JPOIG or Parish information and technology systems, including communication systems, to create, access, share, transmit or receive data or information that would otherwise be subject to any claim of confidentiality or privilege from disclosure hereby waive the right to assert such claim of confidentiality or privilege from disclosure unless related to JPOIG job duties and functions.
 3. Electronic mail and electronic mail tampering. JPOIG e-mail and access to Parish e-mail is for the sole and exclusive purposes of communications and investigations in accordance with established policy and procedure of the JPOIG. Transmission or receipt of e-mails for strictly personal reasons is considered a misuse of JPOIG information and technology. Further, e-mail messages received shall not be altered without the sender's permission nor attachments placed on another's e-mail without the individual's persons consent except as is necessary to redact confidential and privileged information. All JPOIG e-mails sent shall be in the form and format prescribed by the Inspector General and shall contain required disclosures and disclaimers.
 4. Internet use and browsing. Internet access is restricted to uses which further effective and efficient operation of JPOIG, to provide enhanced services of the highest quality, and to further the JPOIG mission. Internet access is a JPOIG resource which is provided for employees to engage in necessary research, professional development and work-related communications.
 5. The following is a non-exclusive list of prohibited uses of JPOIG information and technology:
 - Causing congestion, disruption disablement, alteration or impairment through misuse of JPOIG or Parish technology and communication systems;
 - Installing software on JPOIG or Parish computer without verifiable license;
 - Installing software on JPOIG computers that is legally licensed to the user, but is not licensed to JPOIG;
 - Installing or reconfiguring hardware or software on JPOIG or Parish computers or network without approval;
 - Using systems to solicit or sell products or services that are unrelated to JPOIG operations;

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- Accessing networks, servers, drives, folders or files to which the employee has not been granted access or authorization by Inspector General or his designee;
- Making unauthorized copies of JPOIG or Parish files, information or data;
- Destroying, deleting, erasing or concealing JPOIG or Parish files or other data, or otherwise making such files or data unavailable or inaccessible to the JPOIG or Parish or to another authorized user of the JPOIG or Parish system;
- Propagating any virus, worm, Trojan horse, or other program or code designed to disrupt, disable, impair, or otherwise harm either JPOIG or Parish technology and communication systems or those of any individual computer;
- Using abusive, profane, threatening, discriminatory or otherwise objectionable language through use of JPOIG or Parish technology and communication systems;
- Sending chain letters or participating in any way in the creation or transmission of unsolicited commercial e-mail (“spam”);
- Sending, receiving or accessing offensive materials, including but not limited to sexually explicit materials or materials whose content would otherwise be considered discriminatory or harassing;
- Engaging in unlawful or malicious activities;
- Engaging in recreational games, gambling or wagering activity through use of JPOIG or Parish technology and communication systems;
- Defeating or attempting to defeat security restrictions governing use of JPOIG technology and communication systems;
- Engaging in political or partisan activity;
- Maintaining, organizing, or participating in non-work related Web logs (“blogs”), Web journals, “chat rooms”, social media sites

D. Information and technology, security

1. JPOIG staff shall utilize security protocols to safeguard and protect the JPOIG information and technology equipment, including but not limited to:
 - a. Choosing a secure password and regularly changing password be it JPOIG or Parish passwords;
 - b. Protecting and preserving security by keeping confidential passwords;
 - c. Logging of JPOIG and/or Parish computer and/or networks; and
 - d. Refraining from leaving computer unattended without enabling proper security.
2. Information and technology equipment should never be left unattended in unsecured spaces even if equipment has been powered off, including but not limited to passenger compartments of vehicles.

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3. JPOIG staff shall log out of information and technology equipment at the end of each work day, and equipment shall be powered off unless otherwise notified in writing.
- E. Information and technology, confidentiality
1. JPOIG staff have an affirmative obligation to adhere strictly to JPOIG Confidentiality as it relates to information and technology.
 2. JPOIG staff may only access JPOIG or Parish electronic data files on an as-needed-as authorized basis based upon present job duties and assignments.
 3. JPOIG staff shall not divulge the contents of any JPOIG electronic data to any person except as authorized based upon present job duties and assignments.
 4. JPOIG staff shall not remove, cause to be removed, or make unauthorized copies of JPOIG electronic data.
- F. Information and technology data, preservation
1. JPOIG staff shall save and store all JPOIG information and data on JPOIG network servers.
 2. JPOIG information and data shall not be stored on any personally owned laptops, tablets, computer hard drive(s), or other mobile electronic devices.
 3. Working copies of documents may be temporarily saved to other JPOIG issued laptops, tablets, or storage devices specifically authorized and approved for such purpose.
 4. JPOIG staff shall ensure that all JPOIG information and data, including any information and data first stored on external storage devices, shall be stored, saved and/or backed-up on the JPOIG network server, and deleted from the JPOIG authorized devices on a regular and/or as needed basis.
- G. Personal information and technology equipment
Personal information and technology equipment may not be connected or installed to any JPOIG equipment without prior written approval from supervising Deputy Inspector General or as otherwise authorized by policy.
- V. PROCEDURE
- A. Newly retained JPOIG staff shall complete an “IT Equipment and Electronic Data” form attesting to policy and receipt of any JPOIG IT and Electronic Equipment. *See Appendix*
 - B. “IT Equipment and Electronic Data” forms shall be annually reviewed in conjunction with employee’s annual evaluation unless issuance or return of equipment necessitates an earlier update.

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- C. “IT Equipment and Electronic Data” form shall be maintained in JPOIG staff personnel files.

APPROVED BY:



Kim Raines Chatelain
Inspector General

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Manual of Policies and Procedures

Chapter 9 – Administrative Policies

Section: 9-4 Employee Accountability

Subsection: 9 Identification Card and Access Privileges

AIG STANDARDS: N/A

IIA STANDARDS: N/A

PARISH ORDINANCE: JPCO §2-155.10(15)

STATE LAW: N/A

I. INTRODUCTION

The JPOIG possesses investigative powers and privileges appurtenant to a law enforcement agency as a matter of state and local law.¹⁸⁴ With these powers and privileges, JPOIG employees have a concomitant obligation to accurately represent and identify themselves as JPOIG employees. Employees are issued an identification card and, in connection therewith, are given access to places and things in the course and scope of fulfilling official job duties for JPOIG. This credential is to be used only in connection with official duties.

II. PURPOSE

The purpose of this policy is to ensure that employee identification and access card(s) and are appropriately secured and used only in connection with official JPOIG duties.

III. SCOPE

This policy applies to all JPOIG staff.

IV. POLICY

- A. JPOIG staff will be issued a Parish JPOIG Identification Card at the time of employment that includes the employee's photograph. JPOIG staff shall possess and display the identification card whenever the employee is in the course, scope or performance of assigned duties, tasks and responsibilities, except whenever the display of such may be adverse to the conduct of a specific duty or task or may pose a risk to the safety of an employee.
- B. Identification Cards, uses
1. JPOIG identification cards may be used only by the person to whom it has been issued and only for authorized official use. Authorized official use includes, but is not limited to: identification at an interview, identification during surveillance, or to gain access to government facilities for the purpose of conducting official JPOIG business.
 2. Possession of a JPOIG identification card does not connote law enforcement or peace officer status or authority and does not constitute authority to carry firearms, notwithstanding any designation under state and local law.

¹⁸⁴ La.R.S. 33:9612

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3. JPOIG staff shall not alter or change the identification card issued in any way including, but not limited to, affixing any unauthorized item or writing to it.
4. Identification cards shall be kept secure, and shall not be maintained with key cards or other identification.

C. Identification Cards, misuse

1. JPOIG staff shall not use or permit the use of their identification card or title to directly, or indirectly, participate in or allow any form of solicitation or demand wherein use is made of official position without proper authorization;
2. JPOIG staff shall not use or permit the use of their identification card or title for personal or financial gain or for the benefit of an individual or group of individuals;¹⁸⁵
3. JPOIG staff shall not display or use their identification card or otherwise use title to avoid consequences of an unlawful act;
4. JPOIG staff shall not display identification cards at a place of business in order to gain access at a reduced cost or no cost, or to receive any other privilege not available to the general public;
5. JPOIG staff shall not display identification card for personal reasons or when use of civilian identification card is required or appropriate.
6. JPOIG staff shall take all reasonable measures to secure or maintain control of identification card;

D. Identification card, loss or theft

1. JPOIG staff shall make all reasonable efforts to prevent theft or loss of JPOIG identification card.
2. Avoidable loss credentials may be considered as grounds for disciplinary action.

E. Identification cards, JPOIG property

Employee identification cards are the property of the JPOIG, and employees must immediately relinquish identification card to Inspector General, or designee, upon request and/or upon termination of employment.

V. PROCEDURE

- A. JPOIG staff identification cards shall be displayed in a manner which facilitates easy viewing and ready recognition especially during the course, scope and performance of duty which necessitates the interaction with any non-employee of the Parish.

¹⁸⁵ See La.R.S. 42:1116 and 42:1117.

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- B. Identification Cards, misuse
The misuse or unauthorized use of identification card or JPOIG credentials will result in discipline up to an including immediate discharge from employment.
- C. Identification card, loss or theft
1. JPOIG staff shall promptly give written notice to Inspector General and Administrative Aide of loss or theft of identification card upon determining that it is missing or cannot be located which notice shall include a description of the circumstances surrounding the loss.
 2. The Administrative Aide shall verify the facts surrounding the loss and shall submit a written summary to the Inspector General that includes a determination as to whether or not the loss was avoidable and/or caused by the staff's negligence.
 3. The Inspector General shall determine whether or not the loss of the identification card was reasonably avoidable.
 - a. If determined be unavoidable, a replacement identification card shall be issued to the JPOIG personnel at no cost.
 - b. If determined have been reasonably avoidable by exercise of due care, the JPOIG employee will be required to pay the replacement cost if any.
 4. A copy of the report, determination by Inspector General, and any subsequent action will be kept in employee file. Reports may be made to outside agencies as may be appropriate.
- D. Identification cards, damaged or worn
Damaged or severely worn employee identification card shall be turned into the Inspector General, and a replacement will be requested.

APPROVED BY:



Kim Raines Chatelain
Inspector General

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Manual of Policies and Procedures

Chapter 9 – Administrative Policies

Section:9-4 Employee Accountability

Subsection: 10 Moving Violations and Parking Tickets

AIG STANDARDS: N/A

IIA STANDARDS: N/A

PARISH ORDINANCE: JPCO §2-155.10(15)

STATE LAW: N/A

I. INTRODUCTION

Maintaining the public's trust is integral to JPOIG mission. Employees shall obey all motor vehicle laws, vehicle registration laws and laws related to automobile insurance.

II. PURPOSE

The purpose of this policy is to provide guidelines for JPOIG with regard to moving violations, civil traffic citations and parking tickets, whether or not employees are cited inside or outside of regular working hours.

III. SCOPE

This policy applies to all JPOIG staff.

IV. POLICY

A. Valid Louisiana Driver's License

Where required as a condition of employment, JPOIG staff shall maintain a valid Louisiana driver's license at all times.

B. Responsibility

Staff are personally responsible for resolving any citation, whether or not such citation was received while operating a personal vehicle or one acquired or leased by JPOIG.

V. PROCEDURE

A. Valid Louisiana Driver's License

JPOIG staff who must maintain a valid driver's license as a condition of employment must immediately notify their direct supervisor if their license has been suspended or revoked

B. Moving Violations

1. JPOIG staff who receives a moving violation while operating a vehicle during working hours must prepare a memorandum to supervising Deputy Inspector General explaining circumstances in which violation was received, identifying any passengers in the automobile, and staff's intent regarding resolving the citation no later than the end of work day in which violation was received.

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2. JPOIG staff who receives a moving violation outside of working hours shall prepare a memorandum to supervising Deputy Inspector General explaining circumstances in which violation was received and describing who citation will be resolved.

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Kim Raines Chatelain
Inspector General

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Manual of Policies and Procedures

Chapter 9 – Administrative Policies

Section: 9-4 Employee Accountability

Subsection: 11 Secondary Employment

AIG STANDARDS: N/A

IIA STANDARDS: N/A

PARISH ORDINANCE: JPCO §2-155.10(15)

STATE LAW: N/A

I. INTRODUCTION

Maintaining public trust is integral to JPOIG mission. JPOIG staff must avoid any situation, including secondary or supplemental employment, which might compromise or appear to compromise the independence, fairness or integrity of the JPOIG or to otherwise compromise or appear to compromise an employee's ability to fully perform job duties for JPOIG.

II. PURPOSE

The purpose of this policy is to provide guidelines and boundaries to ensure that secondary or supplemental employment outside of JPOIG does not interfere with employment obligations to JPOIG and performance of job duties. It is further the purpose of this policy to ensure that secondary or supplemental employment does not conflict with the staff's position with the JPOIG, obligations to the JPOIG, or performance of duties associated with the JPOIG within the context of the Parish.

III. SCOPE

This policy applies to all JPOIG staff.

IV. POLICY

A. Definitions

Secondary or "supplement" employment includes self-employment, consulting activities, and volunteer activities that, if compensated, could be considered outside employment. Volunteer activities may include, but are not limited to, bookkeeping, accounting, legal and the like performed for a church or other non-profit.

B. Limitations on secondary or supplemental employment

1. JPOIG employment shall be the primary employment taking precedence over any other occupation or profession.
2. JPOIG staff shall not have any secondary or supplemental employment without the express written approval of the Inspector General.
3. JPOIG staff have an affirmative obligation to disclose any actual or intended secondary or supplemental employment prior to taking the engagement.
4. Failure to disclose secondary or supplemental employment may result in disciplinary action, including termination of JPOIG employment.

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5. Irrespective of disclosure and/or approval, no JPOIG staff shall engage in secondary or supplemental employment or otherwise receive compensation from any person, business, entity who is a prohibited source under the Code of Governmental Ethics.¹⁸⁶
6. No JPOIG staff shall utilize the JPOIG property or equipment in furtherance of or in connection with secondary or supplemental employment, including but not limited to vehicles, office space, computer/data processing, hardware, software, terminals, telecommunications equipment and services.
7. No JPOIG staff shall engage in secondary or supplemental employment activities while on duty with JPOIG.
8. No JPOIG staff shall present themselves as a JPOIG employee while engaged in secondary or supplemental employment
9. JPOIG staff may not engage in secondary or supplemental employment outside of the JPOIG in any case where:
 - a. Work schedule conflicts with or interferes with employee's ability to comply with JPOIG work schedule;
 - b. Work would impair employee's ability to safely and effectively perform duties for JPOIG;
 - c. Work tends to compromise employee's judgment or actions relative to employee's obligations to the JPOIG or otherwise cast the JPOIG in unfavorable light.

V. PROCEDURE

- A. JPOIG staff have an affirmative obligation to disclose secondary or supplemental employment to the Inspector General, or his designee, prior to accepting the engagement. Said disclosure shall be made in the form and manner prescribed by the Inspector General. *See Appendix*
- B. JPOIG staff shall as a condition of continued employment with JPOIG refrain from engaging in any secondary or supplemental employment if the Inspector General, or his designee, determines secondary or supplemental is contrary to the interest or mission of JPOIG.
- C. JPOIG staff shall confirm receipt of decision by Inspector General in writing.

¹⁸⁶¹⁸⁶ La.R.S. 42:1111 *et seq.*

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- D. Irrespective of whether secondary or supplemental employment may from time to time be approved or authorized, no employee shall have any expectation that secondary or supplemental employment is permissible or permitted.

APPROVED BY:



Kim Raines Chatelain
Inspector General

EFFECTIVE DATE: 05/18/2017

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Chapter 9 – Administrative Policies

Section: 9-4 Employee Accountability

Subsection: 12 Performance Evaluation

AIG STANDARDS: N/A
IIA STANDARDS: N/A
PARISH ORDINANCE: JPCO §2-155.10(15)
STATE LAW: N/A

I. INTRODUCTION

The Office of Inspector General must collectively possess a variety of knowledge, skills and experience needed to meet its departmental mission. Employees fairly deserve to be informed about the specific job duties and responsibilities, provided adequate administrative and supervisory direction, be evaluated, and be provided an opportunity to provide insight into any obstacles to performance on an annual basis.¹⁸⁷

II. PURPOSE

The purpose of this policy is to establish guidelines by which employees will receive a performance evaluation. The purpose of this policy is also to set forth parameters for a JPOIG General Pay Plan and the eligibility for raises, establish criteria for efficiency and effectiveness of employees, to assist in building and retaining a workforce of skilled professionals, and to ensure the currency and relevancy of JPOIG process.

III. SCOPE

This policy applies to all JPOIG staff.

IV. POLICY

A. Annual Evaluation

JPOIG staff shall be evaluated at least once in each calendar year in conjunction with consideration of staff's annual pay raise eligibility.¹⁸⁸

B. Evaluation Criteria

Performance is evaluated against the JPOIG's Professional Standards of Conduct, including (1) Accountability; (2) Objectivity; (3) Independence; (4) Professionalism; (5) Fairness; (6) Trustworthiness and (7) Ethics.

1. Accountability: Completing all assigned tasks and performing those duties necessary to comply with policy and procedures.
2. Objectivity: Avoiding conflicts of interest and bringing to attention any situation that may cause, or appear to cause a conflict of interest.

¹⁸⁷ AIG Standards.

¹⁸⁸ JPCO §2-155.10(15), *see generally* JPO No. 18483, Jefferson Parish Executive Pay Plan. Contrary to Jefferson Parish Executive Pay Plan, JPOIG employment is not subject to an "Introductory Period" as per Executive Pay Plan, Section XV, JPOIG employees are not considered eligible for meritorious pay increases until one year anniversary of employment.

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3. Independence: Protecting integrity of the JPOIG by maintaining confidentiality of information and sources of information as required by law.
4. Professionalism: Conducting business with competence and forthrightness.
5. Fairness: Treating others with respect and decency.
6. Trustworthiness: Acting in a reliable and dependable manner.
7. Ethics: Adhering to or exceeding those ethical standards set forth in the Louisiana Code of Government Ethics and those other policies established by the JPOIG.

C. Self-Evaluation

JPOIG staff will, as part of the annual evaluation, complete a self-evaluation assessment and attestation of compliance with JPOIG Administrative Policies, as well as, other pertinent provisions of law and policy.

D. Supervisor Evaluation of Employee

Supervisors shall utilize the approved JPOIG evaluation form in evaluating all staff *See Appendix.*

E. Disclaimer

JPOIG staff performance evaluation is not to be construed as creating a contract of employment or any such other contractual obligation for the JPOIG or the parish, and does not create or abridge any rights otherwise provided by state or federal law. Nothing in this policy should be construed as a guaranty of any particular term of employment, condition of employment, any particular employment position, or otherwise confer the expectation of continued employment or increase in compensation.

V. PROCEDURE

A. Self-Evaluation

1. JPOIG staff will, as part of the annual evaluation, complete a self-evaluation assessment and attestation of compliance with JPOIG Administrative Policies, as well as, other pertinent provisions of law and policy.
2. Ethics Education: Staff have, or will have, completed mandatory Ethics Education on the Louisiana Code of Governmental Ethics in a compliant manner.¹⁸⁹
3. Discrimination/Sexual Harassment: Staff have, or will have, completed one hour of approved employee discrimination/sexual harassment education and training in a compliant manner.¹⁹⁰
4. Licensure and proficiency. Staff have, or will have, satisfied mandates to maintain licensure and a proficiency level sufficient to properly perform

¹⁸⁹ La.R.S. 42:1170.

¹⁹⁰ La. Senate Concurrent Resolution No. 107, SLS 12RS-390.

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job duties and responsibilities as set forth in or contemplated by the position.

B. Supervisor Evaluation of Staff

Supervisors shall utilize the approved JPOIG evaluation form in evaluating staff. *See Appendix.*

1. Staff shall be evaluated based on a “Satisfactory” or “Needs Improvement” rating system. It is the intention of this performance assessment process to focus on the performance and development potential of the employee. In addition to the rating for each category, there are three other sections. Employee Comments, Evaluator Comments, and Action Plan.
2. The completing supervisor shall rate the employee independently in each performance category. The assigned rating must be supported in writing in the “Evaluator Comments” section. In addition, the supervisor should complete the “Action Plan” section regarding any remedial efforts, new direction or focus, additional tasking, opportunities to learn new skills, etc.
3. Upon completion of the evaluation the supervisor will forward the completed evaluation to the Inspector General for review prior to presenting the document to the employee.
4. The completing supervisor should present the completed and approved evaluation to the employee. It is expected that the evaluation will be discussed.
 - a. The employee will be provided with up to 2 business days to comment in the “Employee Comment” section after presentation and review.
 - b. The completing supervisor shall consider any comments from the employee regarding the ratings and, with the approval Inspector General, should feel free to make changes to the ratings and comments if appropriate.
5. JPOIG staff will then meet with the Inspector General, if applicable, prior to the evaluation being finalized. If staff wishes to meet with Inspector General prior to responding in writing, then staff may do so.

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6. JPOIG staff have no right to appeal an annual performance evaluation. However, staff's comments will be attached to the performance evaluation.

APPROVED BY:



Kim Raines Chatelain
Inspector General

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Chapter 9 – Administrative Policies Section: 9-4 Employee Accountability Subsection: 13 Compensation

AIG STANDARDS: AIG Quality Standards for Office – Staff Qualifications, Paragraph C, Basic Qualifications

IIA STANDARDS: N/A

PARISH ORDINANCE: JPCO §2-155.10(15)

STATE LAW: N/A

I. INTRODUCTION

The Office of Inspector General must collectively possess a variety of knowledge, skills and experience needed to meet its departmental mission. Employees fairly deserve to be informed about the specific job duties and responsibilities, provided adequate administrative and supervisory direction, be evaluated, and be provided an opportunity to provide insight into any obstacles to performance on an annual basis.¹⁹¹

II. PURPOSE

The purpose of this section is to set forth parameters for the Office of Inspector General Pay Plan and eligibility for raises.¹⁹²

III. SCOPE

This policy applies to all JPOIG staff.

IV. POLICY

A. Pay – Applicability

1. For purposes of administering the pay schedule, each position shall consist of an open range including a minimum entrance annual rate, a normal maximum rate, and an absolute maximum rate. The grade range between the normal and maximum rate and the absolute maximum rate shall be used for longevity pay purposes. Under no circumstances shall an employee's pay exceed the absolute maximum rate of pay grade to which his position is assigned. Where the term maximum rate is used in this policy, it shall mean the normal maximum rate state in the position description.
2. All appointments shall be made at the minimum rate or such other starting rate as specifically authorized by the Inspector General.

B. Equivalents – Parish automated payroll system

When necessary to the operation of the Parish automated payroll system, salary equivalents of the annual pay rates may be computed on an hourly, day, and bi-weekly basis as follows:

¹⁹¹ AIG Quality Standards for Office – Staff Qualifications, Paragraph C, Basic Qualifications..

¹⁹² JPCO §2-155.10(15), *see generally* JPO No. 18483, Jefferson Parish Executive Pay Plan.

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1. Hourly rate = annual rate/annual base hours for the position (1820 hours for 35 hour/week base); rounded to the nearest four (4) decimal places.
2. Day rate=hourly rate multiplied times regular hours per day, rounded to the nearest two (2) decimal places.
3. Bi-weekly rate=day rate multiplied by 10.

C. Pay Increases

1. Subject to the availability of funds, JPOIG staff may be granted a pay increase (subject to the maximum rate limitation) effective no earlier than the first day of the pay period following the anniversary of their date of hire. JPOIG staff shall be considered for an annual pay raise of up to five (5) percent of current annual salary.
2. JPOIG staff may, in addition to an annual pay raise, receive a merit raise for outstanding job performance of up to five percent of current salary, except that not more than one such merit raise may be granted per calendar year.
3. Pay increases above the normal maximum rate provided in the position description shall be used only as a reward and incentive for long-career and continued merit service. To be eligible for such raise(s), an employee must have at least seven (7) years of service, and the employee's pay rate after raise shall not exceed the normal maximum rate by more than five (5) percent compounded for each three (3) years of service.

D. Cost of Living Adjustments

Subject to the availability of funds and at the discretion of the Inspector General, staff may receive a cost of living raise ("across-the-board cost-of-living raise") whenever such raises are approved by the Parish for Parish employees under like conditions as those of other Parish employees.¹⁹³

E. Pay Reductions

If there is a change in position having a maximum salary rate which is lower than the JPOIG staff's current pay rate, the pay may be frozen, and no additional raise shall be granted while the lower paying position is occupied except in case of an across-the-board cost of living adjustment and/or a revision of the position description.

F. Maintenance Allowance

Reimbursement of actual and necessary expenses authorized or incurred as incidents to employment shall not be considered as deductible allowances; contributions or payments made by the Parish for purposes of providing group insurance and/or retirement benefits shall not be considered as deductible allowance.

¹⁹³ JPCO §2-155.10(15), *see generally* JPO No. 18483, Jefferson Parish Executive Pay Plan, Section XVII (17.6)

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- G. Automobile Allowance
 - 1. JPOIG staff receive monthly car allowance as a result of using their personal vehicle in conduct of JPOIG business.
 - 2. For JPOIG staff receiving a monthly car allowance, payment of such allowance shall be suspended whenever there is an extended leave of absence from duty. “Extended leave” means a period in excess of thirty (30) days.¹⁹⁴

V. PROCEDURE

- A. Pay – Applicability

The pay of all positions shall be determined in accordance with the position description. No person shall be paid at less than the minimum rate nor more than the maximum rate provided for his/her position, except as specifically permitted elsewhere or otherwise provided by the position description.
- B. Pay Increases

JPOIG staff will be evaluated at least once in each calendar year, and consideration of any pay increase will be made at that time in accordance with Section 9-4(12).
- C. Automobile Allowance

Employees pay receive monthly car allowance as a result of using their personal vehicle in conduct of JPOIG business.

APPROVED BY:



Kim Raines Chatelain
Inspector General

EFFECTIVE DATE: 05/18/2017

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¹⁹⁴ See also JPOIG Section 9-2, Sub-section 7.



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Chapter 9 – Administrative Policies

Section:9- Employee Accountability

Subsection: 14 Travel and Training Reimbursement Policy

AIG STANDARDS: N/A

IIA STANDARDS: N/A

PARISH ORDINANCE: JPCO §2-155.10

STATE LAW: N/A

I. INTRODUCTION

Accountability is a key to maintaining the public's trust.. The JPOIG is committed to maintaining accurate time and attendance records ¹⁹⁵

II. PURPOSE

The purpose of this policy is to establish accountability concerning the authorization and reimbursement of any and all travel and training expenses incurred by JPOIG staff.

III. SCOPE

This policy applies to all JPOIG staff.

IV. POLICY

A. All training must be approved in advance, including training conducted by a third party on Parish property where no travel is required.

B. All travel to conventions, seminars or governmental functions must be approved in advance, to include cost of convention, hotel, transportation, meals/per diem

V. PROCEDURE

A. Request for travel and training authorization

1. Obtain approval from the Inspector General by submitting a requests.

Requests under this policy must be accompanied by adequate supporting documentation such as:

a. Registration and Fees – registration form, brochure, conference agenda (required), invoice, quoted amount based on course materials or printed from applicable website.

b. Hotel – quoted amount based on correspondence from hotel, or printed from hotel website, or as indicated in conference or other applicable material.

c. Per Diem – anticipated travel start and end dates, along with estimated per diem as defined in this policy.

d. Airfare – invoice, flight itinerary, quoted amount based on web based searches or travel agent.

¹⁹⁵ AIG Statement of Principles.

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- e. Ground Transportation (Gas, Rental Car, Taxi) – estimation based on miles to travel, quoted amount from vendor or quote from applicable website.
 - f. Mileage Reimbursement – estimation based on miles of travel from known mapping source based on departure from the JPOIG facilities.
 - g. Miscellaneous – itemization of estimated miscellaneous expenses amounts
2. Upon approval for staff travel and training the JPOIG will only reimburse funds expended or otherwise actually incurred in accordance with this policy. Staff may not make travel reservations before approval for is received.
 3. Any amounts approved and are subject to change based on analysis of reimbursable costs as outlined in this policy. This is to include repayment of funds previously reimbursed if travel or training does not occur
- B. Direct Expenditure
Direct Expenditures are expenses which do not follow the Purchase Order process. All travel related items are allowed to be processed as Direct Expenditures using the AS/400 Financial Management System and require the signature of the requestor and the Inspector General.
- C. Travel Expense Voucher
1. The Travel Reimbursement Form must be completed and approved after the trip detailing all expenses incurred by the employee which have yet to be reimbursed by the Parish. *See Appendix.*
 2. Upon returning from a trip the employee must complete a travel expense voucher and account for all expenditures related to the trip, including payments made by direct expenditure. This voucher must be submitted, with all itemized receipts from the trip.
 3. JPOIG staff shall be reimbursed on an actual expense basis for all reasonable travel expenses as outlined. Any travel reimbursements or requests for reimbursements that are not supported by original receipts, may be deducted from the authorized amount. In the event the reimbursements have been made, any unsubstantiated amount will be reimbursed from ordinary pay via a deduction.
- D. Hotel
1. Parish employees are exempt from Louisiana state sales taxes pertaining to their in state hotel room charges. When making hotel reservations, inform the hotel of this exemption and provide the hotel with a Sales Tax Exempt Form (Exhibit A) which may be found on the Louisiana Department of Revenue website. (Contact the Department of Finance for assistance with completing the form.) Parish employees will not be reimbursed for the exempted sales taxes related to in state hotel room charges.
 2. JPOIG staff must remit payments directly to the hotel whenever possible.

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3. In an effort to obtain the most reasonable and cost effective rates when considering hotel accommodations for out of town travel, the JPOIG staff must choose sites within reasonable vicinity of the location where the business is being conducted. Typically, the Hotel hosting the event will offer discounted government rates that will be considered acceptable.
4. No hotel allowance is granted for staff staying with relatives or friends.
5. Miscellaneous hotel room expenses will not be reimbursed except for business related phone calls and internet access charges when necessary.

E. Per Diem

1. No reimbursement will be made when both legs of the travel is completed in one (1) day except when return to the official domicile is made after 8:00 p.m. In this case, only the dinner allowance will be paid.
2. For each full twenty-four (24) hour day of official travel away from the Parish, the allowance for three (3) meals, which includes tips for meals, will be paid to conform to the current meal allowance which is defined below. The first and last day of travel will be paid at seventy-five percent (75%) of the per diem rate regardless of time of departure on the first day of travel and time of return on the last day of travel.
3. The amounts of maximum reimbursement are based on the most current IRS Publication No.1542 "Per Diem Rates" including incidentals. The adjusted per diem rate table can be found on the Intranet: On-Line Forms / Accounting / Travel & Training. Tips on the meals are included in per diem and are not reimbursable separately.
4. Per Diem is ineligible for meals provided by the seminar. The table below provides an example of a breakdown of a per diem reimbursement rate. For the first and last day of travel, subtract the meal amount provided by the seminar and then multiply by 75%. For all other days, simply subtract the meal amount provided by the seminar from the per diem reimbursement rate.

Meals & Incidental Expense Breakdown	\$56
Breakfast	\$9
Lunch	\$13
Dinner	\$29
Incidentals	\$5

Example: Lunch is provided every day while attending a seminar.
 The per diem reimbursement for the first and last day assuming the \$56 rate illustrated above is \$32.25. The calculation is as follows:

\$56 minus \$13 equals \$43
\$43 times 75% equals \$32.25

The per diem reimbursement for all other days in attendance is \$43.

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F. Miscellaneous

1. JPOIG staff who anticipate that there may be a need for an automobile rental must document the need, in writing, prior to out of town travel. Approval is obtained from the Inspector General via the Request for Travel and Training Authorization Form and indicating in the “Description of Expense” section the need for the rental of an automobile. *See Appendix.*
2. For air travel, reimbursement for baggage is authorized, but only if such baggage solely contains equipment or supplies which are necessary for the purpose of the air travel, or if the scope of the personal baggage of the employee for which the cost is levied is reasonable for the purpose of the air travel.
3. A maximum of \$5 will be reimbursed for taxi tips on a one way trip with receipt required.

APPROVED BY:



Kim Raines Chatelain
Inspector General

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Manual of Policies and Procedures

Chapter 9 – Administrative Policies

Section: 9-4 Employee Accountability

Subsection: 14 Voluntary Leave Transfer Program

AIG STANDARDS: AIG Statement of Principles

IIA STANDARDS: N/A

PARISH ORDINANCE: JPCO §2-155.10(15)

STATE LAW: N/A

I. INTRODUCTION

Accountability is a key to maintaining the public's trust.¹⁹⁶ Leave is earned and reimbursed in a like manner to Parish employees in the unclassified service. Adoption by the JPOIG of the Parish's leave policies for unclassified employees should not be misconstrued as an abrogation of authority conferred upon the Inspector General to establish personnel procedures, but an acknowledgment that consistency with regard to benefits is in the best interest of JPOIG employees without compromising independence of department.

II. PURPOSE

The purpose of this policy is to generally set forth parameters for JPOIG staff to participate in the Voluntary Leave Transfer Program in a like manner to those Parish employees of the unclassified service, approved by ordinance of the Parish Council.¹⁹⁷

III. SCOPE

This policy applies to all JPOIG staff.

IV. POLICY

A. The JPOIG participates in the Voluntary Leave Transfer Program that is established by Jefferson Parish for the unclassified employees and is administered by the Department of Human Resources Management.

B. The Voluntary Leave Transfer Program established by Jefferson Parish is adopted by the JPOIG and incorporated herein because it is a benefit to JPOIG employees experiencing medical emergencies.

V. PROCEDURE

A. Voluntary Leave Transfer Program
Voluntary Leave Transfer Program is to be administered by the Department of Human Resources Management for all unclassified employees. Under the Voluntary Leave Transfer Program, a regular employee may donate leave directly to another regular employee, classified or unclassified, who has a personal medical emergency (as define in the Definitions section) or medical emergency of

¹⁹⁶ AIG Statement of Principles

¹⁹⁷ ; JPCO §2-155.10(15), *see source, generally* JPO No. 18483.

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an immediate family member and who has exhausted his or her paid leave, subject to the following conditions as outlined in this Section.

B. Donation of leave

Donation of leave shall be strictly voluntary, without coercion, implied or otherwise. An employee may not directly or indirectly intimidate, threaten, or coerce, or attempt to intimidate, threaten, or coerce, any other employee for the purpose of interfering with any right which such employee may have with respect to contributing, receiving, or using leave under this section. Such actions may be ground for disciplinary actions.

C. Approved Leave Recipient

A regular employee may be approved as a leave recipient and receive/use donated leave under the following conditions:

1. The potential leave recipient has been employed with the Parish for a period of at least one (1) year at the time of the application.
2. The potential leave recipient is not currently on Worker's Compensation.
3. The potential leave recipient must be entitled to accrue leave.
4. The potential leave recipient (or representative acting on behalf of the potential leave recipient, if appropriate) must complete and submit all application forms prescribed by the Department of Human Resource Management for the purpose of consideration as a potential leave recipient. Such forms include, but are not limited to, a medical certification from a licensed physician. The Inspector General may, at JPOIG's expense, require the potential leave recipient to obtain a second medical certification from a licensed physician. If there is a conflict between the first and second medical certification, the Inspector General may, at the JPOIG's expense, require the potential leave recipient to obtain a third medical certification from a licensed physician jointly approved by the Human Resource Management Director and the potential leave recipient. The third opinion shall be binding on both the JPOIG and the employee. All forms must be submitted to the Inspector General.
5. The Inspector General shall approve or disapprove an application of a potential leave recipient and notify the potential leave recipient (or representative acting on behalf of the potential leave recipient, if appropriate) of the decision, in writing, within (10) working days of receipt of the required complied forms.
6. Leave recipient must have exhausted all appropriate paid leave (Sick, Annual, and/or Compensatory leave) prior to the receipt of donated leave.
7. Leave recipient is not eligible to accrue leave time while using donated leave.
8. Leave recipient shall be paid at his designated hourly rate of pay.
9. Leave recipient shall be limited to receiving donated leave in an amount not to exceed a total of twelve (12) workweeks within a period of twelve (12) months.

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10. Leave recipient may use donated leave only for purposes related to the medical emergency for which the leave recipient is approved.
11. The eligibility for receipt and use of donated leave shall be considered terminated on the date of which:
 - a. the leave recipient notifies the Inspector General, in writing, that the medical emergency no longer exists;
 - b. the Inspector General determines, after written notification and opportunity for the leave recipient (or his representative acting on his behalf, if appropriate) to respond orally or in writing, that the medical emergency no longer exists; or
 - c. termination of the leave recipient's employment with the Parish.
12. Any unused donated leave remaining to a leave recipient's credit on termination of the medical emergency must be restored to the leave accounts of the leave donors and shall be prorated between the leave donors except under the following conditions:
 - a. donated leave shall not be restored or paid to leave donors no longer employed by the Parish;
 - b. donated leave shall not be restored if such restored leave would be less than one (1) hour; or
 - c. restoration of donated leave is not administratively feasible, as determined by the Department of Human Resources Management Director.

D. Approve Leave Donor

A regular employee may be approved as a leave donor and donate leave under the following conditions:

1. Potential leave donor must be complete and submit all forms prescribed by the Department of Human Resource Management for the purpose of donating leave. All forms must be submitted to the Inspector General. A designated employee of the Department of Human Resource Management shall review and concur in advance of the transfer of leave to confirm the eligibility of the potential leave donor.
2. Leave donor cannot have a leave balance of less than thirty (30) days of sick leave and less than ten (10) days of annual leave after donation of leave.
3. Leave donor may donate up to ten (10) days of sick leave and ten (10) days of annual leave in a leave year. However, a leave donor who has a current balance of forty (40) or more days of annual leave may donate up to the amount of annual they accrue in the leave year.
4. The minimum amount of leave that can be donate is (1) day.
5. Donation is irrevocable once made. The leave donor shall relinquish all future claims to donated leave, regardless of the medical condition of either the leave donor or leave recipient.
6. Leave donor cannot donate leave to his direct or indirect supervisor.

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- E. Distribution of leave
Leave donated by the leave donor shall be distributed to the leave recipient based on the monetary value of the leave. The conversion method (rounded to the nearest two (2) decimal places) takes the value of leave determined at the current hourly wage of the leave donor multiplied by hours then divided by the current hourly wage of the leave recipient.
- Ex: Donor leave value: 1 hour = \$10; donates 10 hours of leave
Recipient leave value: 1 hour = \$15
- $$\frac{10 \times 10}{15} = 6.67 \text{ hours}$$
- F. Nothing in Section 23-112 of the Jefferson Parish Code of Ordinances shall apply with solicitation, donation, or acceptance of leave under this Section.
- G. Records of Leave used shall be maintained within JPOIG personnel files.¹⁹⁸

APPROVED BY:



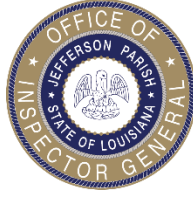
Kim Raines Chatelain
Inspector General

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¹⁹⁸ JPCO §2-155.10(15); *see source, generally*, JPO No. 18483, Jefferson Parish Executive Pay Plan



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Chapter 10 –Miscellaneous

Chapter 10 sets forth miscellaneous administrative and operational policies and procedures that are unique and/or specific from other chapters..



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Chapter 10 – Miscellaneous Section: 10-1 Visitor Procedure

AIG STANDARDS: N/A
IIA STANDARDS: N/A
PARISH ORDINANCE: N/A
STATE LAW: N/A

I. INTRODUCTION

The safety and security of JPOIG employees, as well as, those visiting JPOIG premises is inextricably connected to the integrity of operations of the JPOIG.

II. PURPOSE

The purpose of this policy is to establish guidelines for access to JPOIG premises, to establish policy regarding a visitor log and to provide for the confidentiality of such log.

III. SCOPE

This policy applies to all JPOIG staff.

IV. POLICY

A. JPOIG premises for the purposes of this section means that physical space utilized by JPOIG for daily operations, and any other space acquired for operations, but it shall not include common areas outside of space specifically occupied by JPOIG. This policy may be supplemented by notice posted on JPOIG premises.

B. JPOIG staff access

JPOIG staff access to JPOIG premises is provided and authorized by the Inspector General or the Inspector General's designee.

C. Visitors

1. Visitors for purposes of this policy does not include delivery persons, repair persons or personal guests of JPOIG employees.
2. Visitors may not be left unescorted or monitored while on JPOIG premises. It is the responsibility of the JPOIG employee receiving the visitor to ensure that the visitor is not left unescorted while on JPOIG premises.¹⁹⁹

D. IT Consultants

1. JPOIG does not consider IT consultants as visitors for purposes of this section.
2. IT Consultants will be escorted and monitored at all times.
3. Access is not to be permitted to audit, investigative or other files by non-JPOIG IT support or repair personnel under any circumstances.

¹⁹⁹ JPCO §2-155.10(8).

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E. Other persons

JPOIG will not maintain a record of delivery or repair persons or personal guests of employee absent facts or circumstances which dictate otherwise.

V. PROCEDURE

A. Visitors

1. JPOIG staff should notify administrative staff in advance of any anticipated visitors, whenever feasible;
2. Unless previously known to JPOIG employee, visitors are to provide photo identification;
3. Visitors failing or refusing to cooperate with the set forth procedures are to be vacated from the premise.

B. IT Consultants

IT consultants and representative are to be escorted and monitored at all time when access is granted to any JPOIG computer, server or other electronic device that has the ability to access the internal network or may have confidential or privileged material stored on the device.

APPROVED BY:



Kim Raines Chatelain
Inspector General

EFFECTIVE DATE: 05/18/2017

LAST REVIEWED: 03/18/2022

LAST UPDATED: 03/18/2022

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TABLE OF AMENDMENTS AND REVISIONS

Date	Policy	Amendment	Authority	Effective Date
5/18/2017		Issuance of Manual.	IG D McClintock	7/28/2017
3/18/2022		Reviewed and updated	IG K Chatelain	3/18/2022