

OFFICE OF INSPECTOR GENERAL JEFFERSON PARISH



CORRESPONDENCE TO THE PARISH COUNCIL

PROPOSED AMENDMENTS TO
JEFFERSON PARISH CODE OF ORDINANCES

INCLUSIVE OF:

1. Letter to Council Chairman from Inspector General
2. Resolution of the Ethics and Compliance Commission
3. Inspector General's Office Position Paper
4. Proposed Revisions to JPCO 2-155

3/20/2015

03/20/2015 - Letter to Council Chairman from Inspector General



OFFICE OF INSPECTOR GENERAL
JEFFERSON PARISH

DAVID N. McCLINTOCK
INSPECTOR GENERAL



March 20, 2015

Council Chairman Christopher Roberts
Jefferson Parish Council
General Government Building, Suite 6200
200 Derbigny Street
Gretna, LA 70053

Via Electronic Mail

RE Proposed Amendments JPCO 2-155.10 Office of Inspector General

Dear Chairman Roberts:

At the March 18, 2015 meeting of the Ethics and Compliance Commission, the Commission considered needed amendments to Chapter 2, Article V, Division 2.8, Section 2-155-10 of the Jefferson Parish Code of Ordinance (JPCO) relative to the Office of Inspector General. After discussion, the Commission passed Resolution 15 requesting the Parish Council amend JPCO 2-155.10, Office of inspector general, in a manner consistent with proposed draft language. A copy of the resolution is attached.

In one instance, the requested amendment relates back to the creation to the office prior to my appointment as Inspector General, e.g. process for quality review, which requires amendment before implementation due to certain impairments with the language as adopted. The second requested amendment will merely substitute language found in state law for present language found in local ordinance, but it does not otherwise change the law. The final requested amendment relates to the confidential, and/or non-confidential, of draft inspector general reports. The JPOIG's position on each of these amendments and reasons for requesting amendments is set out in a "Position Paper In Support of Amendments To JPCO 2-155.10 Office Of Inspector General" which was presented to the Ethics and Compliance Commission. A copy of the position paper is also being attached.

As Council Chairman, I am requesting your sponsorship of proposed amendments to JPCO 2-155.10 in a like sum and substance as proposed by the Ethics and Compliance Commission. I hope that you will consider sponsoring this legislation at the earliest opportunity. As always, I am available to discuss and/or answer any questions the Council may have regarding these requested amendments.

Sincerely,

A handwritten signature in blue ink that reads "David N. McClintock".

David N. McClintock

Cc: ECC Commission Chairwoman Carroll W. Suggs (w/ encls)
Councilmember Elton M. Lagasse (w/ encls)
Councilmember Ricky J. Templet (w/ encls)
Councilmember Paul D. Johnston (w/ encls)
Councilmember Mark D. Spears, Jr. (w/ encls)
Councilmember Ben Zahn, III (w/ encls)
Councilmember Cynthia Lee-Sheng (w/ encls)
Parish President John F. Young, Jr. (w/ encls)

03/18/2015 - Resolution of the Ethics and Compliance Commission

On joint motion of all Members of the Ethics & Compliance Commission present, the following resolution was offered:

RESOLUTION NO. 15

A resolution supporting a proposed ordinance to amend Section 2-155 of the Jefferson Parish Code of Ordinances relating to Office of Inspector General to amend subparagraph relating to records disclosure to align with state law; to provide for confidentiality of draft reports of inspector general; and to amend process for quality review of office of inspector general.

WHEREAS, Chapter 2, Article V, Division 2.8, Section 2-538 Code of Ordinances provides that the Jefferson Parish Ethics and Compliance Commission “may establish additional recommendations for the code of ordinances pertaining to ethics and standards of conduct for Jefferson Parish employees, officials and other persons who are the recipients of public funds, or who are engaged in the performance of a parish governmental function, who do business with the Parish, or are in a position to influence the conduct of Parish employees or officials.”

WHEREAS, the Jefferson Parish Ethics & Compliance Commission, at its meeting of March 18, 2015, considered the following proposed language to amend Section 2-155.10 of the Jefferson Parish Code of Ordinances relating to records disclosure to align with state law; to provide for confidentiality of draft reports of inspector general; and to amend process for quality review of office of inspector general:

Sec. 2-155.10. - Office of inspector general.

...

- (8) *Records disclosure.* ~~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. The records prepared or obtained by the office of inspector general shall be deemed confidential and privileged and protected from disclosure under public records laws except as otherwise provided by state law at R.S. 33:9614. Any record or information obtained by the office of inspector general which is confidential or privileged pursuant to any other provision of law shall remain confidential or privileged. It shall be a misdemeanor punishable by fine or imprisonment in accordance with state law governing local ethics entities for the office of inspector general, any designated representative of the office or staff member, or any other public official, corporation or individual to make public any such information or record.~~
- (9) *Reporting the results of inspector general findings.*
- (a) The office of inspector general shall report its recommendations and results of its findings to the ethics and compliance commission.

- (b) 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 inspector general shall provide the affected person or entity a copy of the report or recommendation. The report and recommendations shall be deemed confidential and privileged and protected from disclosure. The report shall not be disclosed, reproduced, distributed, disseminated, in whole or in part, by any named recipient until such time as the report is finalized. Unauthorized disclosure, reproduction, distribution or dissemination of reports and recommendations may be subject to review and disciplinary action by the appropriate authority.
- (c) Such person or entity shall have thirty (30) working days to submit a written explanation or rebuttal of the findings before the report or recommendation is finalized, and such timely submitted written explanation or rebuttal shall be attached to the finalized report or recommendation.
- (d) This section shall not apply when the inspector general, in conjunction with a district attorney, attorney general or United States attorney, determines that supplying the affected person or entity with such report will jeopardize a pending criminal investigation.

...

(16) *Quality review.*

- (a) Quality Assurance review: Finalized public Audits, investigations, inspections and performance reviews which have been published by the office of inspector general shall be subject to annual quality assurance reviews by an advisory a third-party advisory committee to include one (1) representative named by the parish council, one (1) representative named by the parish president, one (1) representative named by the Louisiana Supreme Court, one (1) representative named by the Association of Inspectors General, and one (1) representative named by the ethics and compliance commission; said committee shall be renewed annually.

Qualifications for membership of the committee are (1) members shall be domiciled in Jefferson Parish; (2) members may not hold any elective or appointed position with the parish nor any other government or political party office, nor be employed by any entity that is subject to review by the office of inspector general within two years prior to appointment to the committee.

The representative appointed by the parish council shall serve as chairman. The chairman shall be responsible for providing each committee member with materials for the annual review, presenting the committee's written review to the office of inspector general and setting a public meeting at which the committee will present its written review.

The office of inspector general shall cooperate fully with the committee by providing access to all completed public reports. The inspector general may appear before the committee at its scheduled public meeting.

The committee's written review of the office of inspector general shall be forwarded to the inspector general at least fifteen (15) days prior to the public meeting at which the committee will present its review. The public meeting shall be scheduled after publication of the inspector general's annual report but not later than May 31st.

WHEREAS, Section 2-155.10(8) of the Jefferson Parish Code of Ordinances provides that all records of the office of inspector general shall be exempt from public disclosure. However, the confidential nature of records obtained by an inspector

Inspector General's Office Position Paper



OFFICE OF INSPECTOR GENERAL JEFFERSON PARISH

DAVID N. McCLINTOCK
INSPECTOR GENERAL



March 18, 2015

POSITION PAPER IN SUPPORT OF AMENDMENTS TO JPCO 2-155.10, OFFICE OF INSPECTOR GENERAL

Kim Raines Chatelain
1st Assistant Inspector General

The JPOIG offers this position paper in support of requested amendments to the Jefferson Parish Code of Ordinance (JPCO) 2-155.10, *Office of inspector general*, relative to records disclosure, confidentiality of draft reports and quality review.

BACKGROUND

By way of background, Jefferson Parish received a report of the “Advisory Committee for the Establishment of an Office of Inspector General to the Jefferson Parish Council” dated September 10, 2010. The Committee made specific recommendations for the creation and establishment of an Office of Inspector General in Jefferson Parish. These recommendations took into consideration other model legislation for inspectors general offices, including that of the City of New Orleans. In April 2011, the Parish Council adopted Ordinance 23989 proposing an amendment to the Jefferson Parish Charter to provide for the establishment of an office of inspector general. Subsequently on May 11, 2011, the Parish Council adopted Ordinance 24011 amending the Code of Ordinances thereby creating the office of inspector general and detailing the office’s authority, powers, professional standards and review, as well as related matters. The proposed language was substantially like the language originally adopted by our neighboring parish of Orleans. There was subsequent and necessary amendments made by the City Council of New Orleans for the benefit of its Office of Inspector General.

At or about this same time, state enabling law was undergoing amendments. La.R.S. 33:9611 *et seq.*, adopted in 2008, generally authorizes the establishment of offices of inspectors general. La.R.S. 33:9611 was amended by Acts 2011, 1st Exec. Sess. No. 20 §1 to specifically provide that provisions set forth “applies to the city of New Orleans and the parishes of East Baton Rouge and Jefferson.” Then, La.R.S. 33:9613 and La.R.S. 33:9614, relative to investigative powers of offices of inspectors general and confidentiality of certain records, respectively, were amended by Acts 2012, No. 838 §1.

The overlay of amendments to other local legislation and state legislation with the creation of the Jefferson Parish Office of Inspector General (JPOIG) gave rise certain issues which require clarity. For this reason and those more fully set out below, it is the position of the JPOIG that the Jefferson Parish Council amend JPCO 2-155.10, *Office of inspector general*, relative to records disclosure, confidentiality of draft reports of the inspector general, and the process for quality review of the office. These requested amendments and proposed language will provide needed clarity and resolve issues with the anticipated quality review of the JPOIG.

PROPOSED AMENDMENTS

1. Records Disclosure

Presently, JPCO 2-155.10(8), *Records disclosure*, provides:

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.

The proposed amendment would strike the above language to read as follows:

The records prepared or obtained by the office of inspector general shall be deemed confidential and privileged and protected from disclosure under public records laws except as otherwise provided by state law at R.S. 33:9614. Any record or information obtained by the office of inspector general which is confidential or privileged pursuant to any other provision of law shall remain confidential or privileged. It shall be a misdemeanor punishable by fine or imprisonment in accordance with state law governing local ethics entities for the office of inspector general, any designated representative of the office or staff member, or any other public official, corporation or individual to make public any such information or record.

The requested amendment and proposed language are not intended as a substantive change to local law. Rather, the intent is to align the Parish ordinance with state law. Records disclosure and public records is a matter addressed by federal and state law. La.R.S. 33:9614 establishes a statutory exception or exemption to the publication of certain records of offices of inspectors general. It is the position of the JPOIG that amending the Jefferson Parish ordinance to read as state law provides would bring clarity with congruity between local and state law. *See attached copies of La.R.S. 33:9614.*

2. Confidentiality of Inspector General Draft Reports

Presently, there is no provision which clearly requires that inspector general reports be kept confidential until such time as the reports are finalized. Notwithstanding the absence of this provision, the Code of Ordinances mandates that reports *not* be publicized until such time as the reports are finalized. The lapse of time between the JPOIG's draft report and final report allows for comment and review by persons or entities who are the subject of the report. JPCO 2-155.10(9)(b)-(c) provides the following:

- (b) 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 inspector general shall provide the affected person or entity a copy of the report or recommendation.
- (c) **Such person or entity shall have thirty (30) working days to submit a written explanation** or rebuttal of the findings before the report or recommendation is finalized, and such timely submitted written explanation or rebuttal shall be attached to the finalized report or recommendation. (emphasis supplied).

To ensure that a recipient of a draft report is afforded adequate opportunity to consider a report's findings and recommendations, each draft report is released by the JPOIG with a like statement:

Confidentiality Notice

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 by anyone other than the recipients. The report contains 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.

Some JPOIG draft reports have nonetheless been distributed and disclosed. On August 11, 2014, Assistant Parish Attorney for Jefferson Parish, Angela M. Heath, provided a legal analysis to Parish Attorney Deborah Foshee answering the question, "Is the subject of the inspector general's investigation obligated to maintain confidentiality of the preliminary report?" The conclusion reached was, "No. The duty to not disclose preliminary report applies only to the office of the inspector general. The subject has no duty to maintain the confidentiality of the preliminary report under local or state law, which the exception of any documents or records that are otherwise privileged." This analysis was supplied to the JPOIG as an attachment to a draft report No. 2014-0023.

The proposed amendment to JPCO 2-155.10(9)(b) would clearly provide for confidentiality of draft reports by adding the following language:

- (b) 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 inspector general shall provide the affected person or entity a copy of the report or

recommendation. The report and recommendations shall be deemed confidential and privileged and protected from disclosure. The report shall not be disclosed, reproduced, distributed, disseminated, in whole or in part, by any named recipient until such time as the report is finalized. Unauthorized disclosure, reproduction, distribution or dissemination of reports and recommendations may be subject to review and disciplinary action by the appropriate authority.

It is the position of the JPOIG that the release and/or publication of a draft report by a recipient, or any single recipient when there are many, operates to the prejudice and integrity of the process otherwise mandated by Parish ordinance. Providing for a comment and review period for draft reports, such as an Inspector General's report, represents best practices. Release and/or publication of a draft report operates to negate the comment and review process as well as undermines the release of the final report. Providing for confidentiality of draft reports supports the integrity of the process, permits meaningful dialogue by affected individuals, and allows for purposeful response by subjects of reports without fear of premature publication.

3. Quality review process

Presently, JPCO 2-155.10(16), *Quality review*, provides:

- (a) Audits, investigations, inspections and performance reviews shall be subject to annual quality assurance reviews by a third-party advisory committee to include one (1) representative named by the parish council, one (1) representative named by the parish president, one (1) representative named by the Louisiana Supreme Court, one (1) representative named by the Association of Inspectors General, and one (1) representative named by the ethics and compliance commission; said committee shall be renewed annually.

The proposed amendment would strike certain provisions and amend the ordinance to read as follows:

- (a) Quality Assurance review: Finalized public audits, investigations, inspections and performance reviews which have been published by the office of inspector general shall be subject to annual quality assurance reviews by an advisory committee to include one (1) representative named by the parish council, one (1) representative named by the parish president, and one (1) representative named by the ethics and compliance commission; said committee shall be renewed annually.

Qualifications for membership of the committee are (1) members shall be domiciled in Jefferson Parish; (2) members may not hold any elective or appointed position with the parish nor any other government or political party office, nor be employed by any entity that is subject to review by the office of inspector general within two years prior to appointment to the committee.

The representative appointed by the parish council shall serve as chairman. The chairman shall be responsible for providing each

committee member with materials for the annual review, presenting the committee's written review to the office of inspector general and setting a public meeting at which the committee will present its written review.

The office of inspector general shall cooperate fully with the committee by providing access to all completed public reports. The inspector general may appear before the committee at its scheduled public meeting.

The committee's written review of the office of inspector general shall be forwarded to the inspector general at least fifteen (15) days prior to the public meeting at which the committee will present its review. The public meeting shall be scheduled after publication of the inspector general's annual report but not later than May 31st.

The proposed amendment removes representatives named by the Louisiana Supreme Court and the Association of Inspectors General as these entities' governing codes of conduct and/or for other reasons of conflict will not support or participate in process as set forth by ordinance. Unless amended, the quality review process cannot be implemented. The proposed amendment also defines qualifications for membership to the committee.

The proposed language is borrowed from the City of New Orleans which encountered similar issues in implementing the quality review process it initially anticipated. In its present form, the City of New Orleans refers the quality review process as "External review of the office of inspector general." See *attached City of New Orleans ordinance*. Neither the proposed amendment nor reference to the City of New Orleans "External review of office of inspector general" should be confused with "Peer review." Peer review, which is conducted by the Association of Inspectors General, is separately provided at JPCO 2-155.10(16)(b). The JPOIG is subject to peer review every three years.

CONCLUSION

In conclusion, it is the position of the JPOIG that the requested amendments to the Jefferson Parish Code of Ordinance (JPCO) 2-155.10, *Office of inspector general*, will provide needed clarity, will support the integrity of the process as intended, and resolve issues with anticipated quality review of the JPOIG.

Title 33. Municipalities and Parishes

Chapter 44. Ethics Administration; Local Entities

§ 9611 Application and purposes

A. (1) This Chapter applies to the city of New Orleans and the parishes of East Baton Rouge and Jefferson.

(2) “Local governmental subdivision” or “municipality”, as used in this Chapter, means municipalities and parishes to which the Chapter is applicable.

B. 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 operational 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. The purpose of this Chapter is to serve these objectives by empowering the applicable municipalities and public officials and employees thereof to implement and enforce vigorous ethical standards and codes of conduct, and to that end these provisions are to be liberally construed in support of the purposes for which this Chapter is enacted.

§ 9614 Confidentiality of certain records

A. A local ethics entity, including an ethics review board, shall maintain the confidentiality of records gathered and proceedings conducted during its preliminary investigation of any matters within its jurisdiction. The local ethics entity or ethics review board shall 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. If the local ethics entity decides to issue a report or to file charges after a preliminary investigation, all subsequent records and proceedings in connection with the matter are subject to public review and scrutiny, except as otherwise provided by law.

B. Any material, records, data, and information compiled by an office of inspector general in an investigation, examination, audit, inspection, or performance review under this Chapter is confidential and privileged and not subject to R.S. 44:1 et seq., until the investigation, examination, audit, inspection, or performance review is complete...

City of New Orleans Municipal Code
Article XIII Office of Inspector General

Sec. 2-1120. - Office of inspector general.

(16) External review of the office of inspector general.

- (a) Completed reports of audits, inspections and performance reviews, and public reports of investigation, shall be subject to an annual quality assurance review by a third-party advisory committee, known as the quality assurance review advisory committee for the office of inspector general.
 - 1. The quality assurance review advisory committee for the office of inspector general shall include a representative appointed by the city council, who shall serve as chair of the committee; a representative appointed by the office of the mayor; and a representative appointed by the ethics review board.
 - a. The committee shall be renewed annually, although representatives may be reappointed at the discretion of the appointing entities.
 - b. The chair shall be responsible for:
 - i. Providing each committee member with materials for the annual review;
 - ii. Setting a public meeting at which the committee will present its written review. The public meeting shall take place after the publication of the OIG's annual report mandated by subsection (9), but before May 31;
 - iii. Presenting the committee's written review to the office of inspector general at least 15 calendar days prior to the date of its public meeting.
 - c. Committee members must be domiciled in Orleans Parish.
 - d. A committee member may not hold any elective or appointed position with the city nor any other government or political party office, nor be employed by any entity that is subject to review by the office of inspector general. Additionally, a member may not have held any of these positions within two years before appointment to the committee.
 - 2. As the entity being reviewed, the office of inspector general does not participate on the committee, but will provide full cooperation, including access to all completed reports. The inspector general will appear before the committee at its annual public meeting.

Proposed Revisions to JPCO 2-155

On motion of _____, seconded of _____, the following ordinance was offered:

SUMMARY NO. _____ **ORDINANCE NO.** _____

An ordinance amending Section 2-155.10 of the Jefferson Parish Code of Ordinance relative to disclosure of records of the Office of Inspector General; to provide for confidentiality of draft reports of the inspector general; to amend the process for quality review of the office of inspector general and otherwise providing with respect thereto. (Parishwide)

WHEREAS, the ordinance amends Chapter 2, Article V, Division 2.8, Section 2-155-10(8) of the Jefferson Parish Code of Ordinances relative to disclosure of records of the office of inspector to read in a like manner as state law, La.R.S. 33:9614, which provides for confidentiality and protection of privilege of records obtained by the offices of inspectors general;

WHEREAS, the ordinance amends Chapter 2, Article V, Division 2.8, Section 2-155.10(9)(b) of the Jefferson Parish Code of Ordinances to provide that inspector general reports released in draft form shall be kept confidential by the recipients of the draft reports to support the comment period and publication of final report which is otherwise provided by ordinance. Presently, the law does not provide that draft reports issued by the inspector general be kept confidential by the recipients of such reports, but the ordinance prohibits the inspector general from releasing the report until the expiration of a thirty day comment period. The publication and/or release of draft reports by recipients, or any one or several recipients, operates to the detriment of the process which provides for a comment period before reports are made public and presents a risk of inadvertent disclosure of information which is otherwise confidential. e.g. would be redacted from final report.

WHEREAS, the ordinance amends Chapter 2, Article V, Division 2.8, Section 2-155.10(16) of the Jefferson Parish Code of Ordinances to relative to quality assurance review of the office of inspector general. Ordinance amends qualifications for membership on the committee and clarifies process to ensure implementation and execution of the intended quality assurance review is achievable. The present law provides for quality assurance review of office of inspector general but membership includes representatives from entities who cannot participate in such process.

WHEREAS, the Ethics and Compliance Commission has reviewed the proposed amendments and has recommended these amendments to the Parish Council for adoption by formal resolution passed at the meeting of the Ethics and Compliance Commission on ___ of March, 2015;

WHEREAS, the Inspector General by letter to the Parish Council has

likewise requested that ordinance be amended as recommended by the Ethics and Compliance Commission.

THE JEFFERSON PARISH COUNCIL HEREBY ORDAINS:

Sec. 2-155.10. - Office of inspector general.

...

- (8) *Records disclosure.* ~~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. The records prepared or obtained by the office of inspector general shall be deemed confidential and privileged and protected from disclosure under public records laws except as otherwise provided by state law at R.S. 33:9614. Any record or information obtained by the office of inspector general which is confidential or privileged pursuant to any other provision of law shall remain confidential or privileged. It shall be a misdemeanor punishable by fine or imprisonment in accordance with state law governing local ethics entities for the office of inspector general, any designated representative of the office or staff member, or any other public official, corporation or individual to make public any such information or record.~~
- (9) *Reporting the results of inspector general findings.*
- (a) The office of inspector general shall report its recommendations and results of its findings to the ethics and compliance commission.
- (b) 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 inspector general shall provide the affected person or entity a copy of the report or recommendation. The report and recommendations shall be deemed confidential and privileged and protected from disclosure. The report shall not be disclosed, reproduced, distributed, disseminated, in whole or in part, by any named recipient until such time as the report is finalized. Unauthorized disclosure, reproduction, distribution or dissemination of reports and recommendations may be subject to review and disciplinary action by the appropriate authority.
- (c) Such person or entity shall have thirty (30) working days to submit a written explanation or rebuttal of the findings before the report or recommendation is finalized, and such timely submitted written

explanation or rebuttal shall be attached to the finalized report or recommendation.

- (d) This section shall not apply when the inspector general, in conjunction with a district attorney, attorney general or United States attorney, determines that supplying the affected person or entity with such report will jeopardize a pending criminal investigation.

...

(16) *Quality review.*

- (a) Quality Assurance review: Finalized public Audits, investigations, inspections and performance reviews which have been published by the office of inspector general shall be subject to annual quality assurance reviews by an advisory a third-party advisory committee to include one (1) representative named by the parish council, one (1) representative named by the parish president, one (1) representative named by the Louisiana Supreme Court, one (1) representative named by the Association of Inspectors General, and one (1) representative named by the ethics and compliance commission; said committee shall be renewed annually.

Qualifications for membership of the committee are (1) members shall be domiciled in Jefferson Parish; (2) members may not hold any elective or appointed position with the parish nor any other government or political party office, nor be employed by any entity that is subject to review by the office of inspector general within two years prior to appointment to the committee.

The representative appointed by the parish council shall serve as chairman. The chairman shall be responsible for providing each committee member with materials for the annual review, presenting the committee's written review to the office of inspector general and setting a public meeting at which the committee will present its written review.

The office of inspector general shall cooperate fully with the committee by providing access to all completed public reports. The inspector general may appear before the committee at its scheduled public meeting.

The committee's written review of the office of inspector general shall be forwarded to the inspector general at least fifteen (15) days prior to the public meeting at which the committee will present its review. The public meeting shall be scheduled after publication of the inspector general's annual report but not later than May 31st.

The foregoing ordinance having been submitted to a vote, the vote thereon was as follows:

YEAS: ___ **NAYS:** ___ **ABSENT:** ___

This ordinance was declared to be adopted on this the ____ day of _____, 2015, and shall become effective as follows, if signed forthwith by the Parish President, ten (10) days after adoption, thereafter, upon signature by the Parish President or, if not signed by the Parish President, upon expiration of the time of ordinances to be considered finally adopted without the signature of the Parish President, as provided in Section 2.07 of the Charter. If vetoed by the Parish President and subsequently approved by the Council, this ordinance shall become effective on the day of such approval