

Management Advisory – OIG Procedure

Purpose

This Management Advisory procedure establishes a consistent, transparent process for the Office of Inspector General to formally notify City management of findings and recommendations that are best addressed through administrative action, while preserving OIG independence and promoting corrective action, accountability, and continuous improvement.

Definition

A Management Advisory (Advisory) is a formal written communication from the OIG to a City department, division, or office to identify observed issues that may warrant internal administrative action, review, or corrective response.

Criteria for Advisory

OIG generates Advisories for a variety of reasons including not limited to cases in which:

1. Abuse or waste is identified
2. Control weaknesses or gaps are discovered
3. High risk of loss to City resources exists
4. Advancement of ethical culture, internal controls, or compliance without duplicating investigative resources

Drafting and Approval

The Lead Prosecutor will draft an Advisory in collaboration with the investigator assigned to the case. The Inspector General approves each Advisory before release to other departments.

Content and Quality

Each Advisory is reviewed for accuracy, fairness, and tone and will include:

1. Summary of the issue(s) or finding(s)
2. Background and relevant facts
3. Applicable policies, procedures, or Code sections
4. Recommended managerial actions
5. Request for a written response, including an expected follow-up date and OIG liaison.

Pre-release Management Response Mechanism

The OIG will provide the city manager, Assistant City Manager (ACM) and department director (Management) with a draft report and work with Management and the City Controller's Office (CCO) to clarify, correct, etc., the Advisory. The OIG will then issue the final draft Advisory to Management for response. CCO will work with the department to draft the plan of action for each Advisory finding including a timeline for implementation. Management will send the acknowledgement and plan of action to OIG.

Release and Reporting

OIG will issue the completed Advisory to Council, including the management response, once the management response is received. OIG will release the report to the public five days later. The Advisory will be accessible on the OIG website and will be summarized in the quarterly OIG reports after release to the public.

Tracking and Follow-Up

OIG will log each Advisory in its case management system. CCO will work with departments to make sure they are implementing the plan of action that management committed to implement. The OIG may collaborate with the City Auditor for the purposes of tracking and follow up. Annually, OIG will prepare a "Prior Advisory Follow-up" annually to report on the progress of management in addressing the findings and recommendations as well as a report on the progress of each on the one year anniversary of an Advisory being acknowledged by management. Advisories may be escalated or reopened for investigation if warranted.

Avoidance of Duplication

The OIG will seek to reduce duplicative interviews, document requests, and operational disruption by:

1. using a single point of contact where practical,
2. sharing non-confidential, non-privileged factual summaries when appropriate,
3. sequencing requests to avoid "two teams asking the same thing," and
4. coordinating timelines where publication or management response processes intersect.

Deconfliction between City Auditor's Office Audits and OIG Advisories

Audits provide independent assurance over systems and controls; Advisories are faster, risk-focused communications arising from OIG work to drive immediate corrective action—coordinated with Audit to avoid duplication and protect independence. **Purpose.** Deconfliction

ensures the City Auditor's assurance work is not duplicated, preserves OIG independence, and minimizes operational burden on departments while still allowing timely escalation of risk.

Early coordination. When an Advisory topic appears to overlap with an ongoing or planned audit, the Inspector General (or designee) will notify the City Auditor's Office and the City Controller's Office (CCO) at the earliest practical stage with a high-level description of the issue, subject matter, and urgency—consistent with confidentiality requirements.

Role clarity.

- **Audit-led (City Auditor):** If the primary need is assurance, testing, and evaluation of controls/processes across a defined period, the matter is generally best handled as an audit.
- **OIG-led Advisory:** If the primary need is timely notification of a specific, credible control breakdown, waste/abuse risk, or management action item identified through OIG work, the OIG may proceed with an Advisory while coordinating to avoid duplicative requests.

Urgent risk exception. If the OIG identifies a credible, time-sensitive risk of loss, harm, or ongoing exposure, the OIG may proceed with an Advisory on an expedited basis while notifying the City Auditor/CCO as soon as reasonably practicable.

Follow-up and verification. Consistent with the Tracking and Follow-Up section, the OIG may collaborate with the City Auditor regarding implementation tracking or validation work, and Advisories may be escalated or reopened for investigation if warranted.

Duties and Obligations of Management

The Department Director receiving an Advisory shall:

1. Acknowledge receipt of the Advisory within 3 working days of receipt.
2. Ensure a good-faith review of the Advisory and related matters.
3. Respond to the Advisory with an initial response and plan of action to address the OIG's findings within 30 days of acknowledging receipt. If needed, Management shall cooperate fully with any OIG follow-up or additional inquiries within ten working days of receipt of any OIG follow-up or inquiry.
4. Work with the CCO to document the response to the plan of action.
5. Protect whistleblower confidentiality and prevent retaliation.