
2025 ANNUAL RISK ASSESSMENT



**Jefferson Parish
Office of Inspector General**





The Jefferson Parish Office of Inspector General (JPOIG) provides independent oversight and increased accountability of Jefferson Parish (Parish) government, its departments, agencies, special districts, and entities receiving funds through the Parish.

By September 1st of each year, the JPOIG is required by Parish ordinance to present an annual work plan for the upcoming year, that includes a risk assessment. Jefferson Parish Code of Ordinances (JPCO) 2-155.10(17) provides:

The inspector general shall present an annual work plan for the ensuing calendar year to the ethics and compliance commission, no later than September 1 of each year. The plan shall include:

(a) Risk assessment criteria used in establishing work plan...



Course Objectives

- Understand how people make decisions
- Identify sources of ethics standards
- Describe basic principles of ethics
- Identify AIG principles related to ethics
- Be able to apply ethics standards to your work



Course Objective: Understand how people make decisions

Ethics Awareness



Ethics Awareness

- Ethics, is it knowable?
- How many believe that it is definable?
- Is it something we can agree upon?



Ethics Awareness

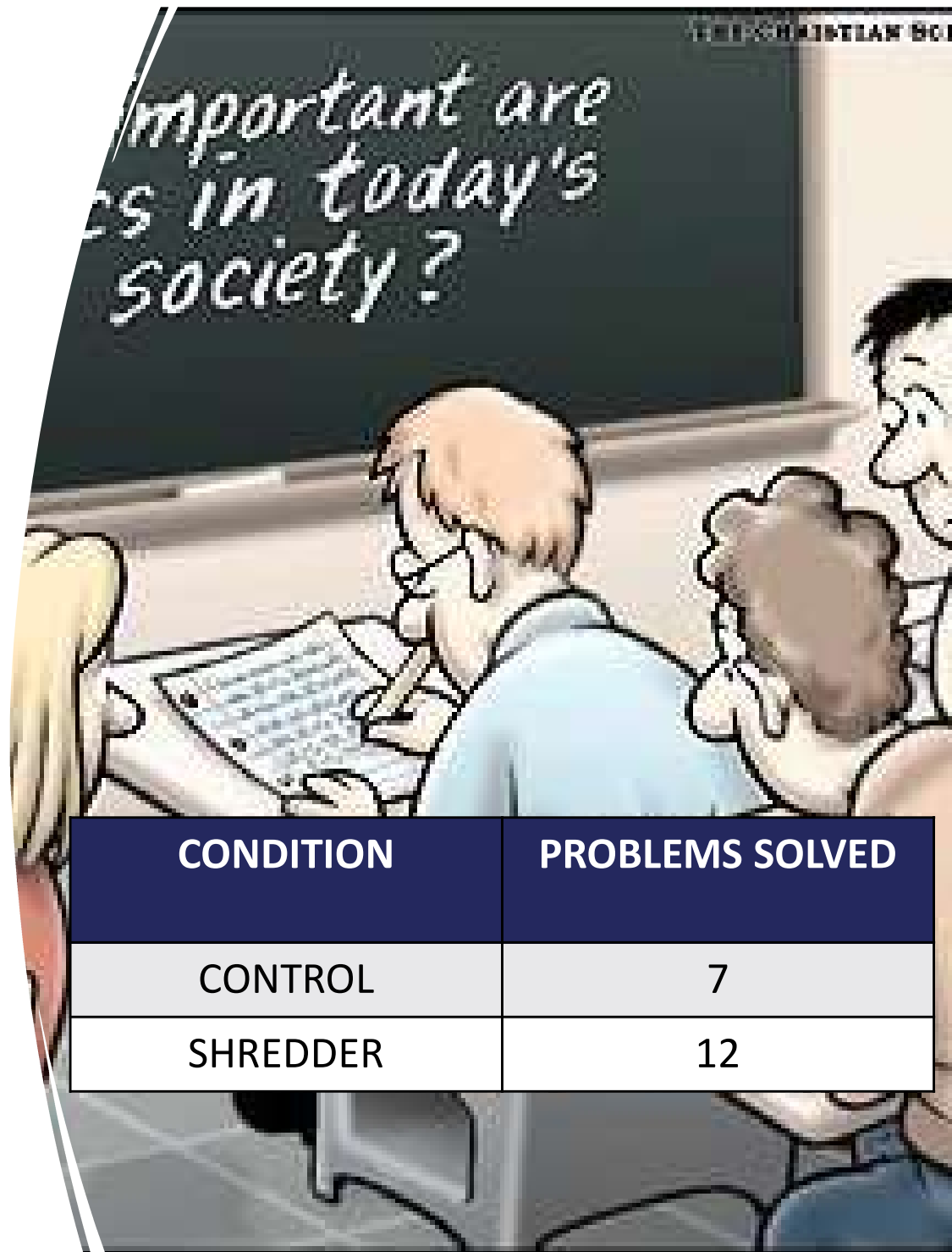
- The MIT testing experiment:
- Announcement is made seeking students to participate. Earn up to \$10 for about ten minutes of time. Students are presented with 20 matrices to solve, finding for two numbers that added up to 10.



Ethics Awareness

Guess how many problems were solved when students were allowed to self-report correct answers?

Guess how many problems were solved when students turned in papers to be checked?



CONDITION	PROBLEMS SOLVED
CONTROL	7
SHREDDER	12

Ethics Awareness

What factors might affect individual behavior?

What affect would adding the super achiever to the population of test takers?

How do we combat beliefs, rationalizations, and perceptions about individual or collective integrity?





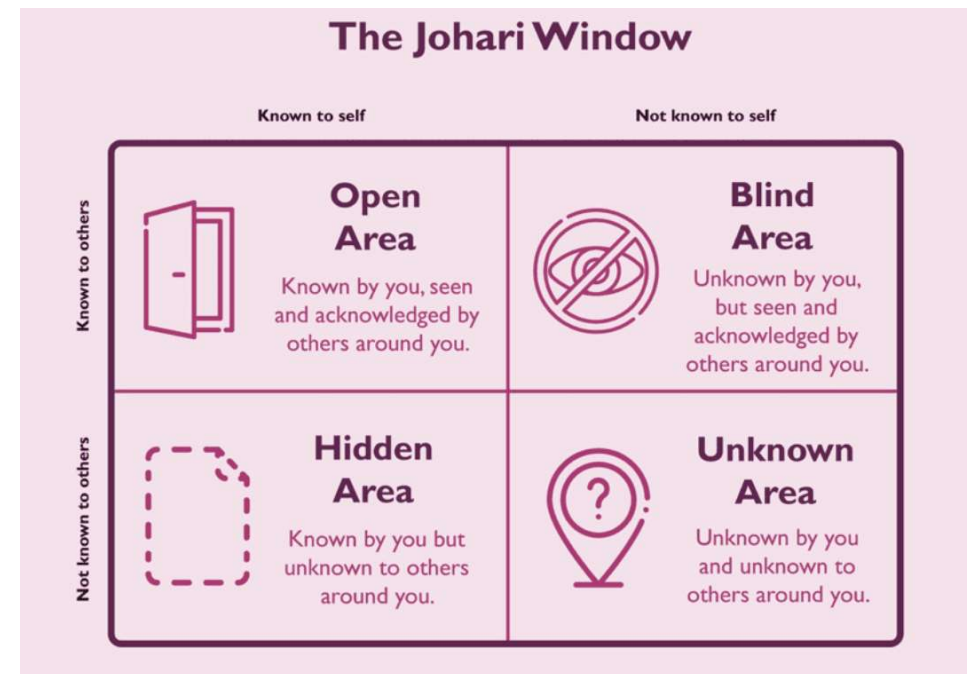
Truth or myth?

- It is easy to be ethical.
- Unethical behavior is committed by “a few bad apples.”
- Ethical leadership is about leader integrity
- People are less ethical than they used to be.

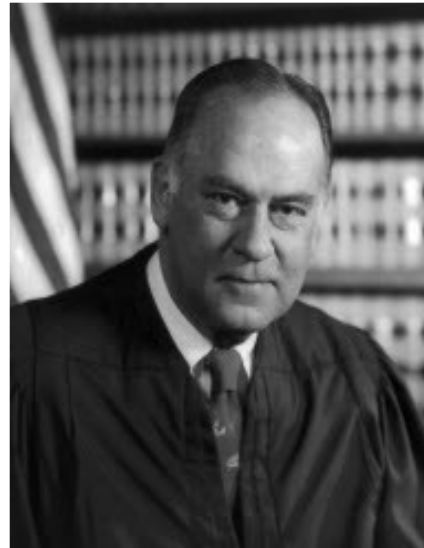


Ethics Awareness

- Most people believe they are ethical.
- Most inspectors general believe they are ethical.
- Are we as ethical as we believe?
- What are our vulnerabilities for rationalization?



A code of ethics is a set of principles and values used by individuals and organizations to establish what is acceptable behavior and to govern their decision-making process, e.g., codes of business ethics, codes of conduct for employees, and codes of professional practice.



**Former Supreme Ct. Associate
Justice Potter Stewart**

**“Ethics is knowing the
difference between what you
have a right to do and what
is right to do.”**



Course Objective: Identify sources of ethical standards



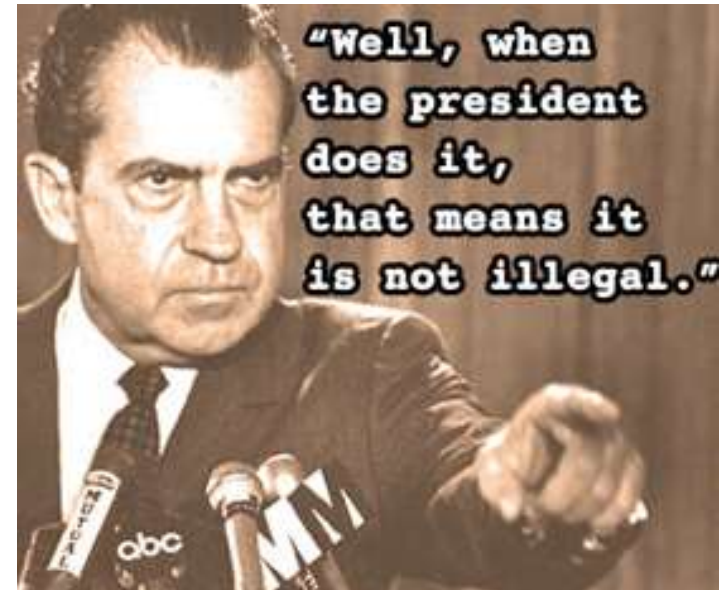
Sources of Ethical Standards

- Laws
- Rules and Regulations
- Codes of Conduct
- Policies
- Professional Standards
- Other



Sources of Ethical Standards

- **Laws**
 - US Ethics in Government Act of 1978
 - State Codes of Governmental Ethics
 - Local Codes of Governmental Ethics
- **Code of Conduct**
 - US Standards of Ethical Conduct for Employees of the Executive Branch
 - US Department of Defense Standards of Conduct (SOCO)
 - City of Chicago, Aspirational Code of Conduct
- **Policies**



Sources of Ethical Standards

- Professional Standards
 - Code of Professional Conduct, American Institute of Certified Public Accountants (AICPA)
 - Code of Ethics, The Institute of Internal Auditors (IIAA)
 - Certified Fraud Examiner Code of Professional Standards – Association of Certified Fraud Examiners (ACFE)
- Other
 - Personal ethical standards



Sources of Ethical Standards

Examples of Laws (Federal/State/Local)

- 18 U.S.C. § 201- Bribery of public officials and witnesses
- 18 U.S.C. § 207. Restrictions on former officers, employees, and elected officials of the executive and legislative branches
- Federal Ethics in Government Act of 1978
- Part III of Chapter 112, Florida Statutes
- Palm Beach County Code of Ethics



**Course
Objective:
Describe basic
principles of
ethics**



Basic ethics concepts

Ethics Concepts in Law (Federal/State/Local)

- Conflicts of interest
- Receiving something of value, gifts and gratuities
- Misuse of office or abuse of public position
- Nepotism
- Secondary Employment



Conflicts of Interest

A conflict of interest is a personal interest or relationship that conflicts with the faithful performance or official duty. Employee is prohibited from participating personally and substantially in an official capacity in any particular matter in which, to his knowledge, he or any person whose interest are imputed to him has a financial interest. US DoD Standards of Conduct Office



Gifts and Gratuity

An employee shall not, *except* as permitted by subpart B of this part, solicit or accept any gift or other item of monetary value from any person or entity seeking official action from, doing business with, or conducting activities regulated by the employee's agency, or whose interests may be substantially affected by the performance or nonperformance of the employee's duties. Code of Federal Regulations, Ethical Conduct Employees of Executive Branch



Gifts and Gratuity

- You may not accept any gift or money for participating in speaking engagements, lectures or discussion forums in the course of your service.
- You, your spouse, domestic partner or minor child may not solicit or accept money or anything of value in return for your advice or assistance on matters concerning your city business, unless that advice or assistance is wholly unrelated to your City responsibilities.

City of Chicago Governmental Ethics, Plain English.



Misuse of office or public position

No public servant shall use the authority of his office or position, directly or indirectly, in a manner intended to compel or coerce any person or other public servant

- to provide himself, any other public servant, or other person with any thing of economic value.
- to engage in political activity.

LA Code of Governmental Ethics





Nepotism

A public official may not appoint, employ, promote, or advance, or advocate for appointment, employment, promotion, or advancement, in or to a position in the agency in which the official is serving or over which the official exercises jurisdiction or control any individual who is a relative of the public official.
FL Code of Ethics

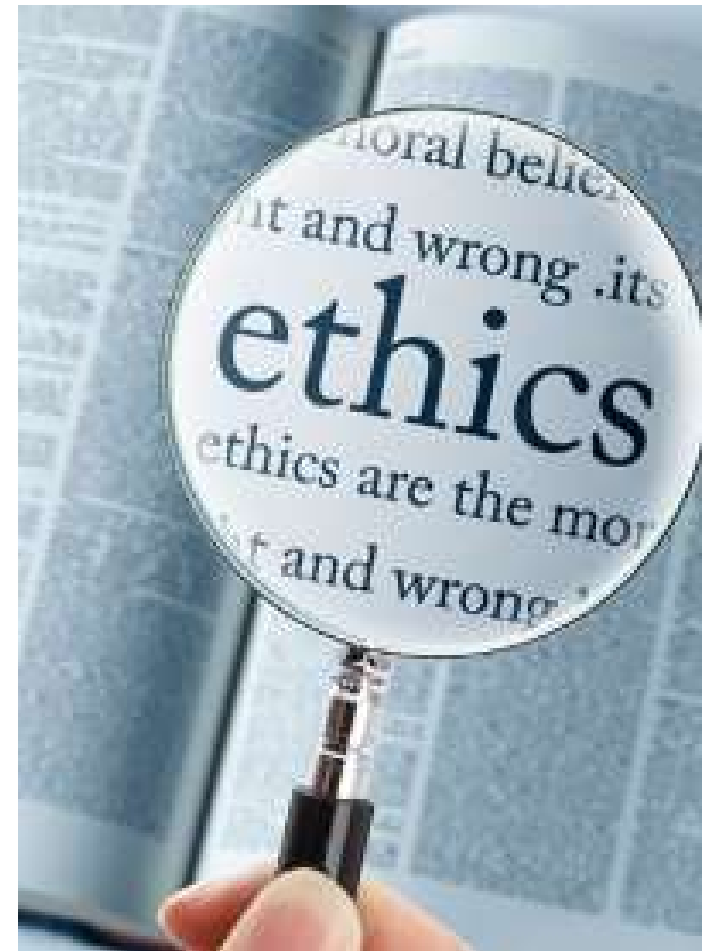


Resolving ethics issues

- Remedies provided by law, regulation, policy
- Recusal/ Disqualification from participation
- Disclosure

Resolving ethics issues

Remedies for conflicts of interest include regulatory exemptions, disqualification from participation in a conflicting particular matter, divestiture of the conflicting financial or other interest (to include resignation from the conflicting outside position), transfer, reassignment or limitation of duties, qualified trust, waiver, and resignation. US DoD Handbook for Ethics Counselors



Resolving ethics issues

Recusal

Every public employee, excluding an appointed member of any board or commission, shall disqualify himself from participating in a transaction involving the governmental entity when a violation of this Part would result. The procedures for such disqualification shall be established by regulations. LA Code of Governmental Ethics



Resolving ethics issues

Disclosure

- Financial Disclosure Statements
- Disclosing conflicts of interest



Resolving ethics issues

For example.

a. Individual Waiver (18 U.S.C. § 208(b)(1) and 5 C.F.R. 2640.301). (1) Procedure. DoD employees must make a written request through their supervisors to the cognizant Ethics Counselor. The Ethics Counselor will forward the request, along with findings of fact regarding the items listed in JER 5-302.d(1)-(8), up their chain of command to the Agency DAEO. JER 5-302.b. The Agency DAEO will make a recommendation to the appointing official as to whether the waiver may be granted.



Resolving ethics issues

NEW YORK

City Department of Investigation Commissioner Mark Peters recuses himself from de Blasio fundraising probe



By GREG B. SMITH | NEW YORK DAILY NEWS | APR 15, 2016 | 8:36 PM



Mark Peters, Commissioner of city Department of Investigation, announced Friday he is recusing himself from the agency's probe of Mayor de Blasio's fundraising efforts. (Photo by Paul Marini for the New York Daily News)

Are there situations when “recusal” isn’t enough?

How might this affect other agency work?

Resolving ethics issues

NEW YORK

EXCLUSIVE: Mayor de Blasio compiled secret dossier on city watchdog who's slapped City Hall with multiple damning reports



By GREG B. SMITH SEP 20, 2018 | 9:00 PM



On September 26, 2018, it is reported that the Mayor compiled document titled, “Statement of Reasons for Removal of Mark G. Peters.” Commissioner can only be removed “for cause.”

Mayor de Blasio (right) has compiled a seven-page document targeting Mark Peters (center), commissioner of the Department of Investigation since 2014. It details accusations by employees working for the mayor or agencies controlled by the mayor. (Christie M. Farriella New York Daily News)

Resolving ethics issues

Mayor Fires Mark Peters, Appoints New Head Of Department Of Investigation

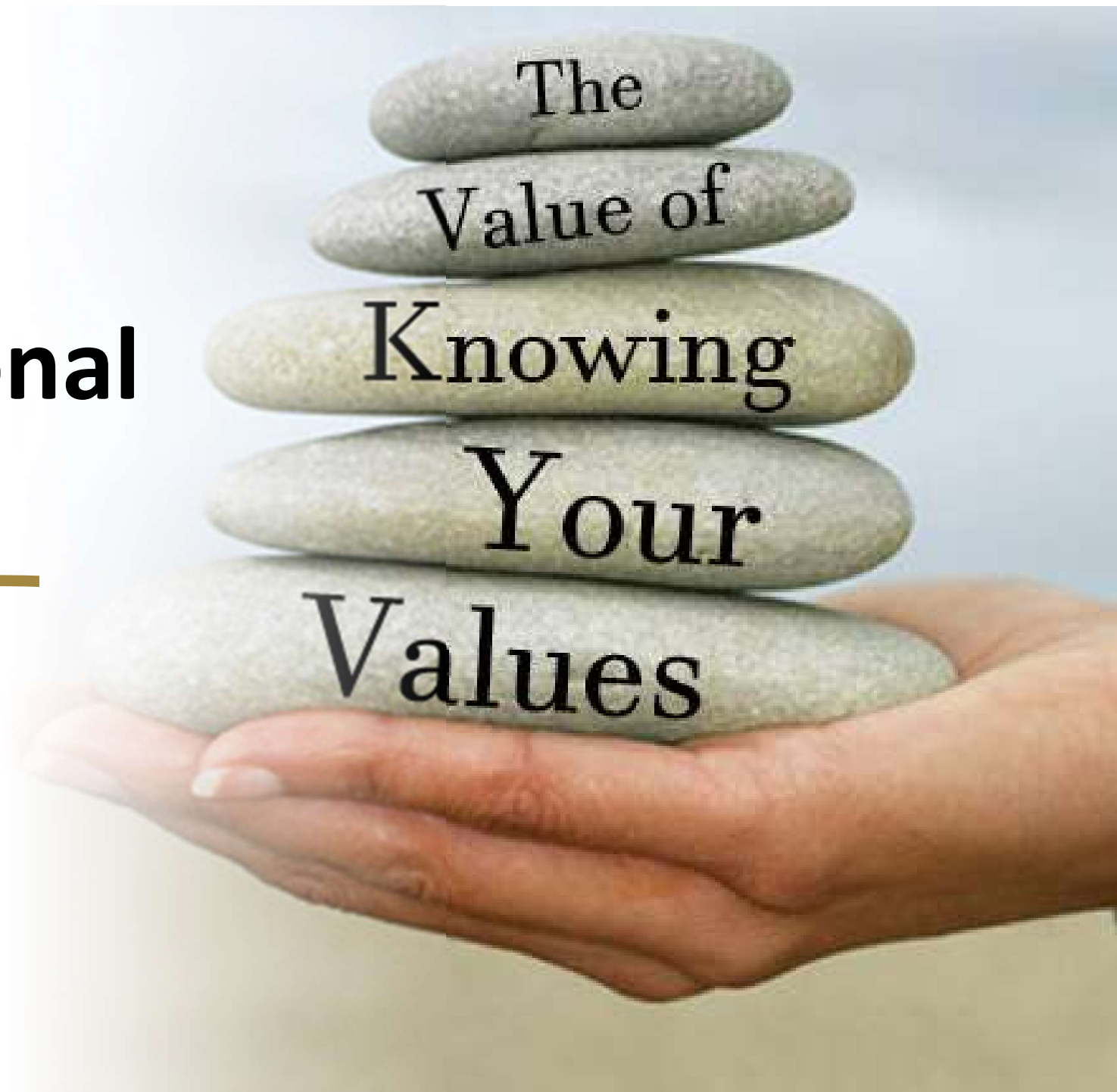
November 16, 2018 at 5:25 pm Filed Under: Bill de Blasio, Department of Investigation, Mark Peters, New York



NEW YORK (CBSNewYork/AP) - After a long battle, Mayor Bill de Blasio fired the city's Department of Investigation commissioner.

On November 16, 2018, de Blasio was quoted, “There has been abuse of power. There had been inappropriate treatment of employees. It’s quite clear from the McGovern report that these are not the type of activities becoming of a commissioner of DOI,” de Blasio said.
New York (CBS New York/AP)

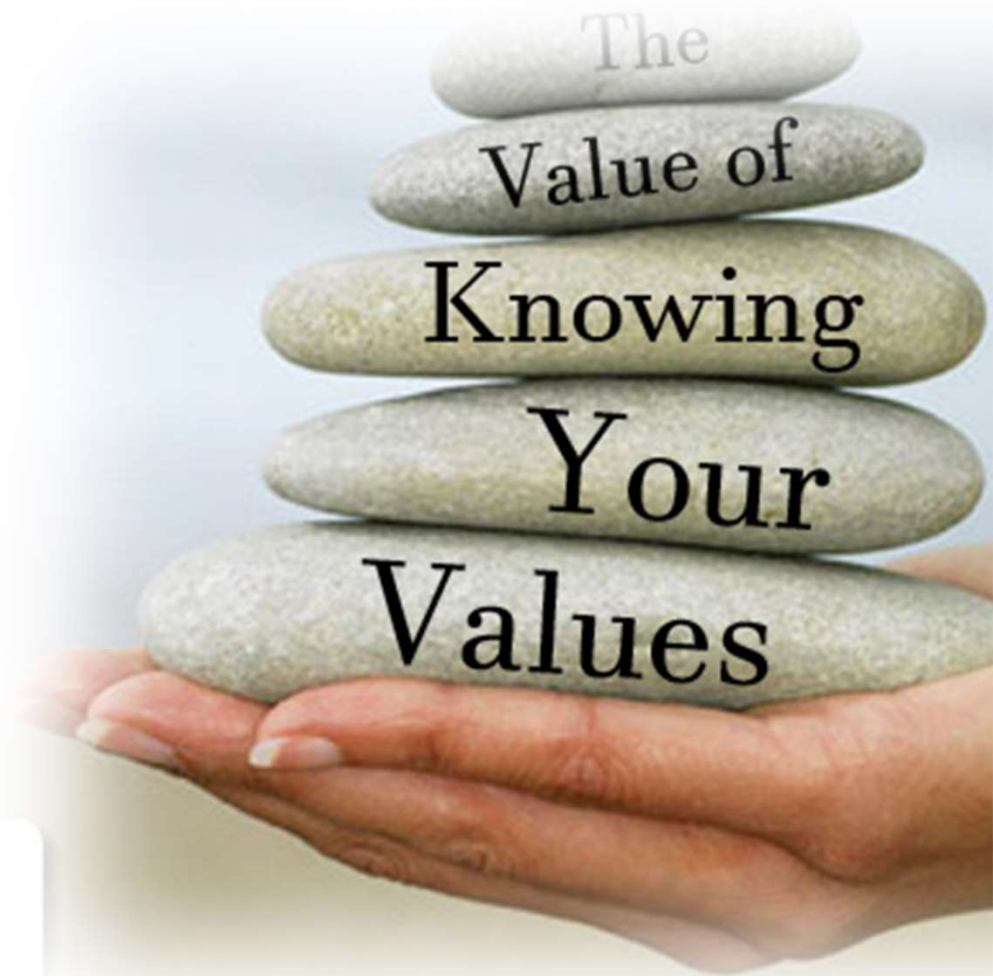
Professional Ethics



Professional Ethics

Examples of Professional Standards

- Code of Professional Conduct, American Institute of Certified Public Accountants (AICPA)
- Code of Ethics, The Institute of Internal Auditors (IIA)
- Certified Fraud Examiner Code of Professional Standards (ACFE)
- Associations of Inspectors General Principles and Standards (AIG Green Book)

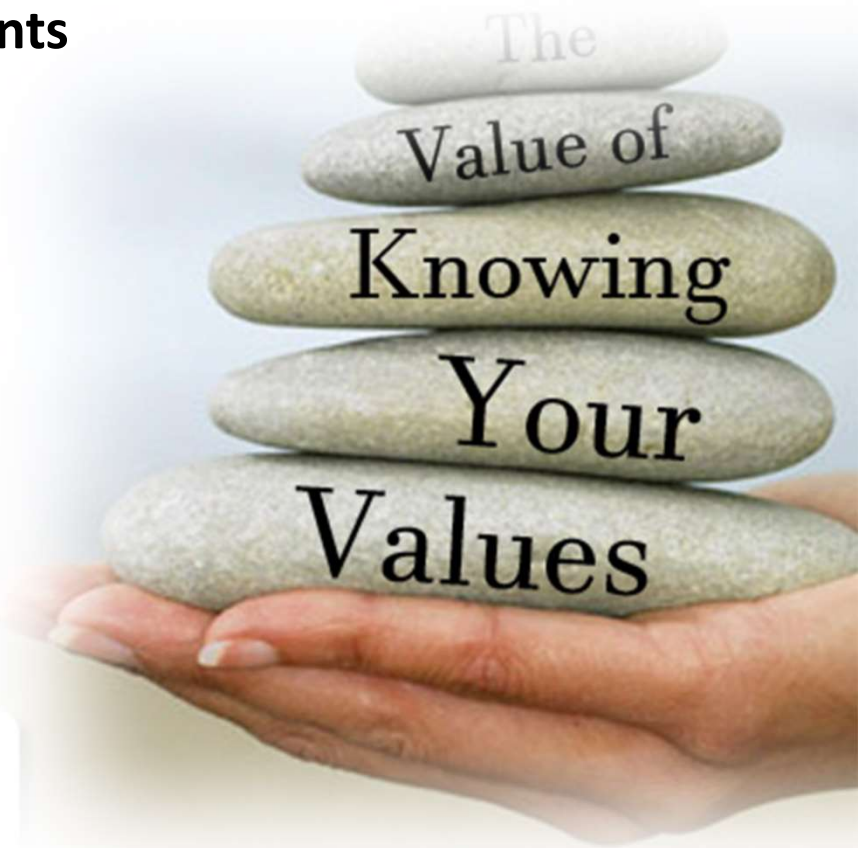


Professional Ethics

American Institute of Certified Public Accountants (AICPA) Code of Professional Conduct

A few of these governing ethics include:

- Responsibilities principle - In carrying out their responsibilities as professionals, members should exercise sensitive professional and moral judgments in all their activities.
- The public interest principle - Members should accept the obligation to act in a way that will serve the public interest, honor the public trust, and demonstrate a commitment to professionalism.
- Integrity principle - To maintain and broaden public confidence, members should perform all professional responsibilities with the highest sense of integrity.



Professional Ethics

The Legal Profession

Lawyers, paralegals and other employees of the legal profession are bound to a general code of ethics. A few of these governing ethics include:

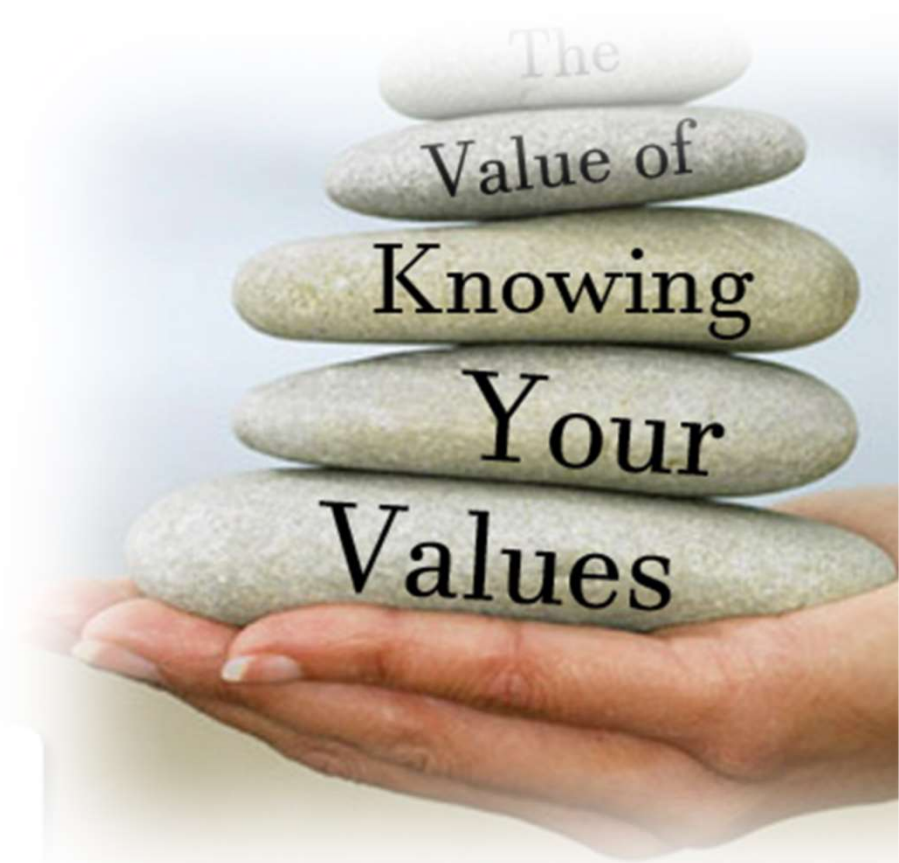
- Confidentiality - Lawyers must maintain their clients' confidence at all times.
- Competence - Legal professionals must represent their clients with a high level of competence.
- Communication - Lawyers shall inform clients of status of representation.



Professional Ethics

Statement of Principles for Offices of Inspector General

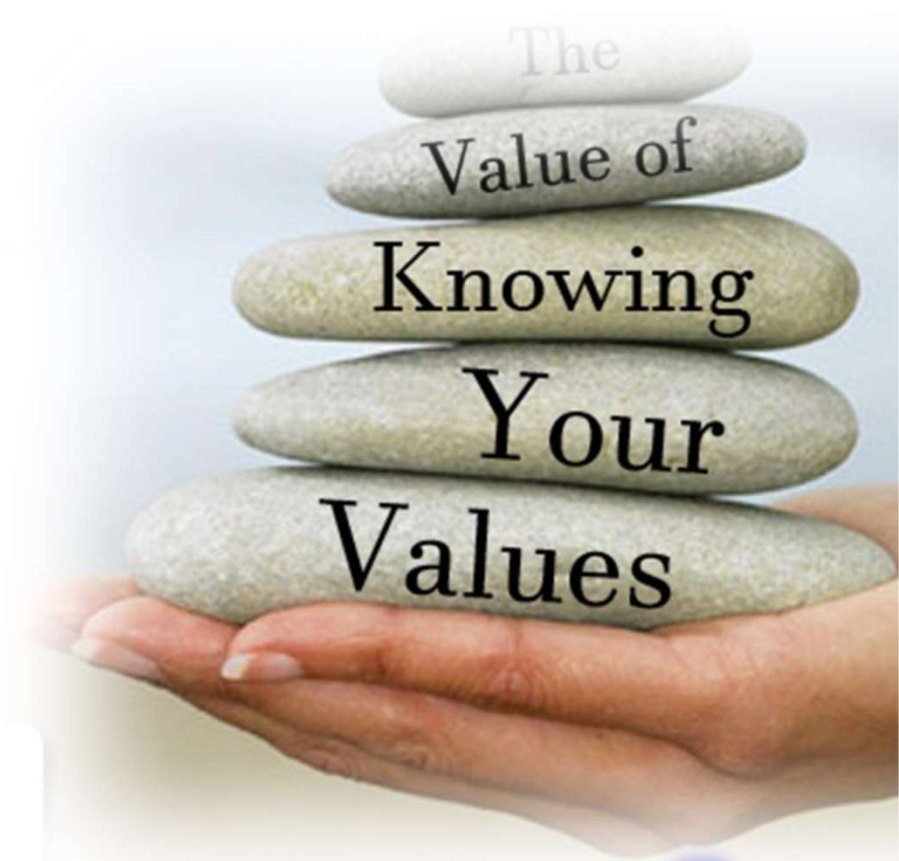
“The public expects OIGs to hold government officials accountable This public expectation is best served by inspectors general when they follow the basic principles of integrity, objectivity, independence, confidentiality, professionalism, competence, courage, trust, honesty, fairness, forthrightness, public accountability and respect for others and themselves.”



Professional Ethics

An Ethical Work Environment is Best Promoted by:

- Management's communication that ethics is a core value.
- Set the tone at the top – Model ethical behavior.
- Comprehensive set of ethics laws, rules, codes, procedure and policies.
- Continuous Ethics Training



Course Objective: Be able to apply ethics standards to your work

PRINCIPLES AND STANDARDS FOR OFFICES OF INSPECTOR GENERAL

REVISED & APPROVED
OCTOBER 22, 2022

EFFECTIVE JULY 1, 2024



ASSOCIATION OF INSPECTORS GENERAL
524 West 59th Street
New York, NY 10019
www.inspectorsgeneral.org

OIGs and Ethics

General Standards for Investigations, Inspections, Evaluations, and Reviews:

- Independence
- Due Professional Care

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OIGs and Ethics

Quality Standards for Offices of Inspector General:

INDEPENDENCE

The Inspector General and OIG staff involved in performing or supervising any assignment should be free from personal or external impairments to independence and should constantly maintain an independent attitude and appearance.

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OIGs and Ethics

Quality Standards for Offices of Inspector General:

INDEPENDENCE (cont.)

Personal impairments may include, but are not limited to, the following:

- Official, professional, personal, or financial relationships that might appear to lead the OIG to limit the extent of the work, to limit disclosure, or to alter the outcome of the work...

PRINCIPLES AND STANDARDS FOR OFFICES OF INSPECTOR GENERAL

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OIGs and Ethics

Due professional care includes:

Objectivity –Evidence should be gathered and reported in a fair, unbiased manner in an effort to determine the validity of alleged improprieties or evaluate the likelihood of violations of statutes, rules, or regulations.

Ethics - At all times the actions of the OIG investigators should conform with the high standards expected of OIG staff.

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OIGs and Ethics

Greenbook: Statement of Principles for Offices of Inspector General

“The public expects OIGs to hold government officials accountable This public expectation is best served by inspectors general when they follow the basic principles of integrity, objectivity, independence, confidentiality, professionalism, competence, courage, trust, honesty, fairness, forthrightness, public accountability and respect for others and themselves.”

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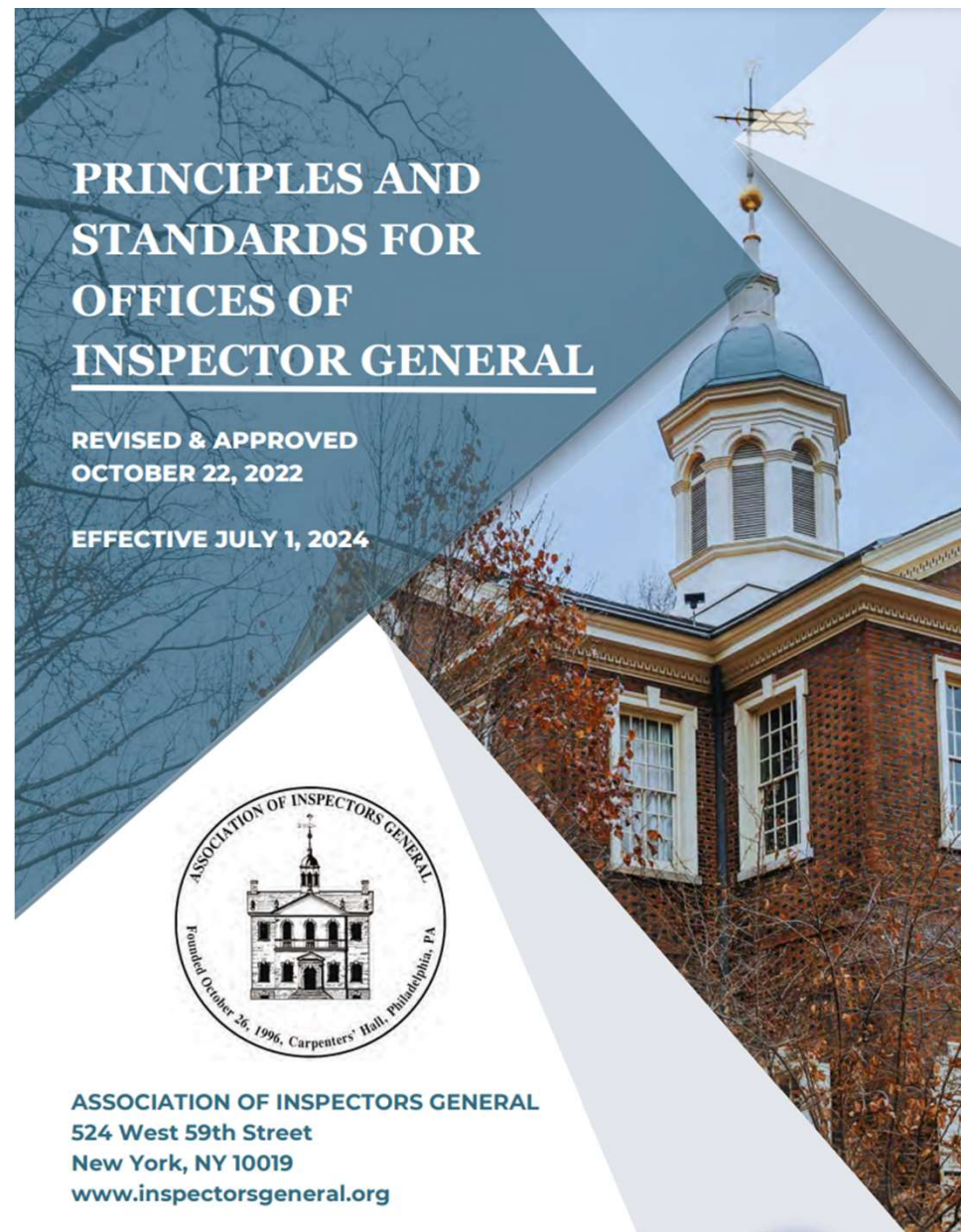
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OIGs and Ethics

- Even when **no actual conflict of interest exists**, IGs must always try to avoid any suggestion that some personal interest interfered with their decision-making process.
- All decisions must be fact-based and in the public interest. Facts that could be interpreted to suggest a conflict of interest need to be explained/considered.



OIGs and Ethics

After receiving numerous whistleblower allegations of misconduct by the Acting Inspector General and Deputy Inspector General of the Department of Homeland Security, the Senate Subcommittee on Financial and Contracting Oversight staff initiated an investigation into these allegations in June 2013.

United States Senate
Subcommittee on Financial and Contracting Oversight
Committee on Homeland Security and Governmental Affairs

Claire McCaskill, Chairman
Ron Johnson, Ranking Member

Investigation into Allegations of Misconduct by the Former Acting and Deputy Inspector General of the Department of Homeland Security

STAFF REPORT



State's top investigator resigns over conflict of interest

January 26, 2023

Longtime Florida Fish and Wildlife Conservation Commission Inspector General resigned following allegations that he shared confidential information about a criminal investigation with a complainant with whom he shared an inappropriate relationship and who was the wife of the subject of the investigation.

Investigators found that he did not recuse himself nor disclose a conflict of interest in a matter. No disciplinary action was recommended by the Office of the Chief Inspector General.

He told the Orlando Sentinel, “The appearance was not good, and I would never intentionally violate the law.”



OIGs and Ethics

What's the test for friendship?

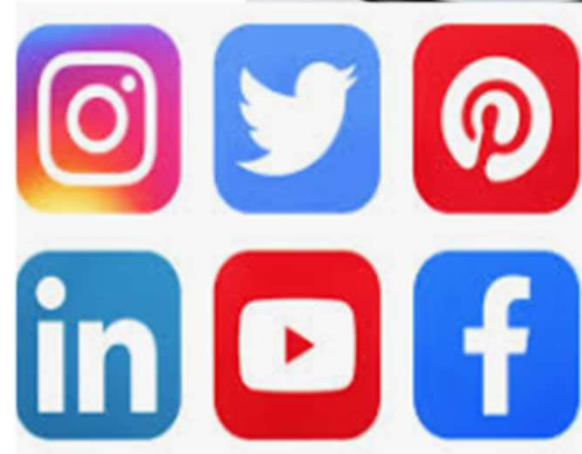
What questions might you consider asking, asking yourself?



OIGs and Ethics

What about “social media” friendships?

What about perception of “social media” friendships?



OIGs and Ethics

ABA Formal Opinion 488 -
Judicial Disqualification or
Disclosure

The ABA Ethics Committee identified three categories of relationships between judges and lawyers: acquaintanceships; friendships; and close personal relationships.



Anonymous letter calls out Jefferson Parish council member, IG for being too close

BY BLAKE PATERSON | Staff writer May 10, 2024 4 min to read



Jefferson Parish Council member Jennifer Van Vrancken, left, and Inspector General Kim Chatelain
Provided photos



An anonymous letter mailed to Jefferson Parish Council members this week has led to renewed skepticism of the Office of Inspector General as it seeks to restore investigatory powers stripped away years ago.

Sent from an unnamed group of “concerned citizens,” the letter suggests that Inspector General Kim Chatelain is too cozy with At-Large Council member Jennifer Van Vrancken to provide effective oversight, pointing to posts on social media showing the two socializing.

Van Vrancken in an interview called the letter “political theater at its worst” and “fake from top to bottom.”

OIGs and Ethics



OIGs and Ethics

What is your first reaction, break it down?

If this were you, if this were your Inspector General, what would you do or recommend be done? Why?

Are there any additional facts which you feel would be relevant and needed to guide your action or recommendation?



OIGs and Ethics

The criticism comes one week after the Parish Council temporarily shelved an ordinance that would have made it easier for the IG office to obtain information from the parish for its investigations; altered the qualifications required to be appointed inspector general; and allowed the role a third, four-year term.

The Parish Council was on the cusp of approving the ordinance at its May 1 meeting but backed off after Chatelain took the rare step of issuing a public letter the night before the meeting in which she argued that an unrelated budget amendment on the agenda lacked sufficient transparency.

Van Vrancken echoed Chatelain's criticism at the meeting. She likened the amendments to a "shell game" and sought to defer them but was outvoted by her colleagues.



“There’s certainly an appearance of impropriety,” said 5th District Council member Hans Liljeberg. “I think the council is going to look long and hard at this relationship before they give the inspector general more power.”

“It’s concerning, for sure,” added 2nd District Council member Deano Bonano. “It’s not a best practice to have a close relationship with someone who you’re charged with being a watchdog over.”

At-Large Council member Scott Walker said he hadn’t received the letter or seen the pictures, but said, “I haven’t seen any indication since I’ve been in office that the IG is not capable of doing her job in an unbiased way.”

What do I do?

Do you feel the article is fair and unbiased? Why or why not?

How is this similar or different from Wildlife Fisheries IG?

OIGs and Ethics



Jefferson Parish Council member Jennifer Van Vrancken, left, and Inspector General Kim Chatelain are shown at a Krewes of Hermes event in February 2024. The photo was included with an anonymous letter mailed to Parish Council members complaining about their too-close relationship.

Facebook

OIGs and Ethics

Do OIG ethical standards require/permit the OIG to produce a report pointing out “awful but lawful” conduct?

If yes, how “awful” must the conduct be?

What is the standard/test for “awful but lawful”?



OIGs and Ethics

*Palm Beach County OIG 2014-0009 WB -
Tanya McConnell*

PBC OIG received anonymous complaint that the County Engineering and Public Works Department Chair of the Engineering Short List Committee improperly voted for firms with whom she maintained close personal relationships and improperly influenced the votes of other committee members.



OIGs and Ethics

*Palm Beach County OIG 2014-0009
WB - Tanya McConnell (cont.)*

When interviewed by the OIG,
County Engineering and Public Works
Department Chair responded:

*“Everybody does their own vote...and I am entitled to vote
however I see fit.... and if it’s for my friends, hallelujah.”*



OIGs and Ethics

*Palm Beach County OIG 2014-0009
WB - Tanya McConnell (cont.)*

The OIG found no written standard/criteria the County Engineering and Public Works Department Chair violated in voting for her friends or just “joking” with subordinates to vote for her friends.

How you write this in a report?
Not substantiated/not supported?



OIGs and Ethics

How about something like this in an OIG report?



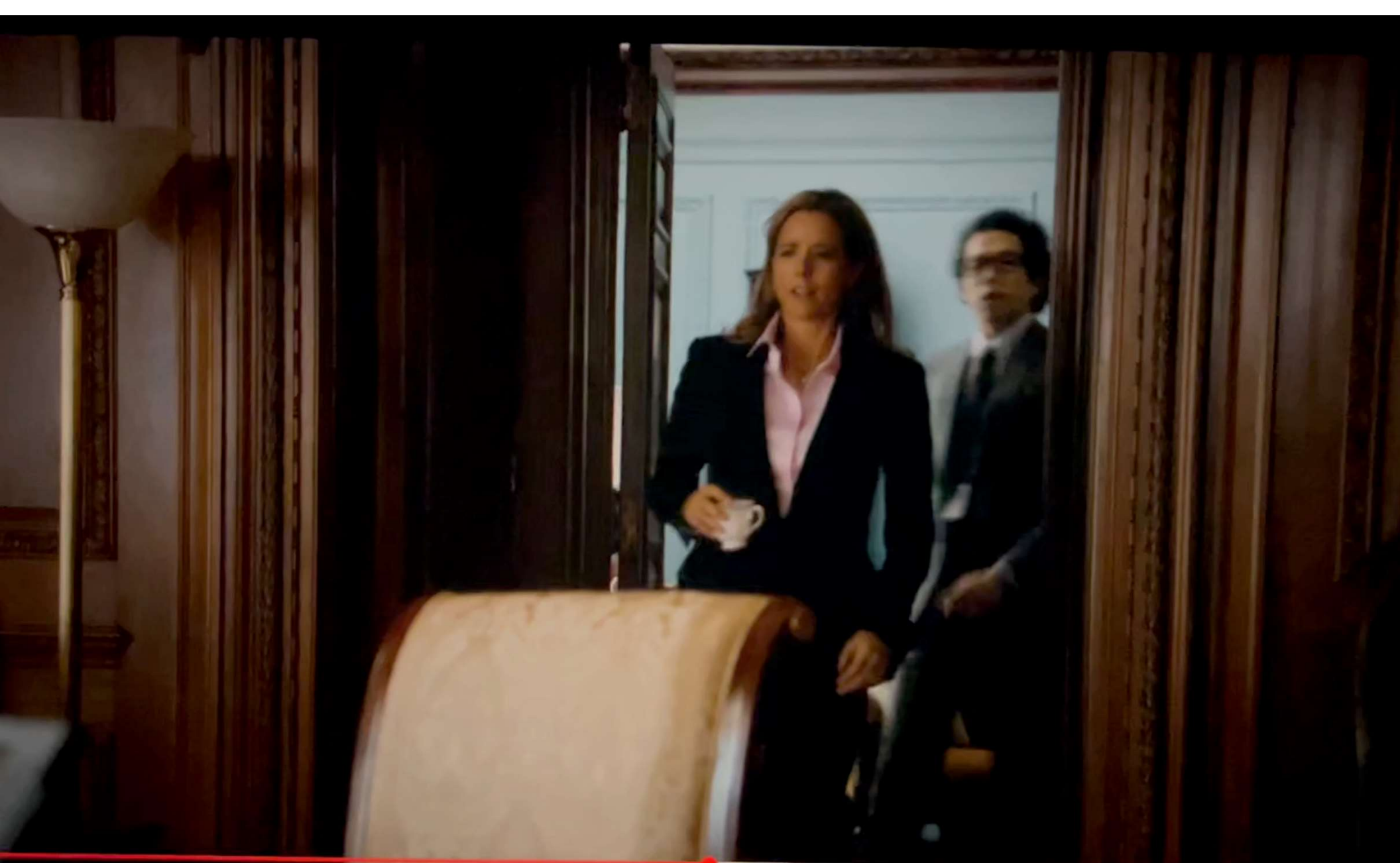
To better understand this report, some discussion of Office of Inspector General (OIG) investigation standards and the gray area between legality and what is right is warranted. OIG investigations usually measure a subject's actions against an established standard (law, ordinance, policy) to determine whether an allegation is either supported or not supported.

In this particular case, the OIG found no standards the subject violated. However, just because certain actions may not violate any written standards does not make those actions right. Under certain cases as this, the OIG is obliged to bring this to light and suggest corrective measures.

OIGs and Ethics

Choosing how to communicate a message, are there ethical considerations when writing a report?





OIGs and Ethics

- Can ethics be an issue when writing OIG reports?
- Consider, words are never created equal. Even synonyms vary as far as connotation.



OIGs and Ethics

Consider word choices and ask:

- What information am I presenting?
- Is this the best possible word choice?
Your word choices affect the attitudes your readers have toward you, your subject matter, and the witnesses/subject.
- Do your word choices convey bias or insinuate something that you do not wish to communicate?
- Active language is preferred; can passive language be appropriate? Misleading?



OIGs and Ethics

Grand Jury Report- *“Individual Unethical Behavior within the City of West Palm Beach Ethics Committee”* - January 31, 2007

“....City of West Palm Beach Mayor Lois Frankel announced the formation of an Ethics Committee. She appointed all ⁶⁵members including her friend State Representative Mary Brandenburg....

In July 2006, after her appointment to the Ethics Committee, Mary Brandenburg met with members of the Northwood Renaissance, a non-profit community development corporation in the north end of the city of West Palm Beach.... Northwood Renaissance members expected Rep. Brandenburg to address these ethical issues as part of the Ethics Commission’s work and create some type of code of conduct of acceptable behavior.

Mary Brandenburg dismissed that discussion and immediately addressed her own agenda, a lesson on how to get things done in the City of West Palm Beach....”

Questions Or Comments

