

From: Mark Steranka
To: Jones, Onyx
Cc: Chokshi, Punit; Colleen Rozillis; Halie Garcia
Subject: Ethics Hotline and FWA Program
Date: Tuesday, September 10, 2019 7:27:55 AM

Onyx,

Great job last night. The Council seemed pleased with the progress and momentum of activities to date relative to the audit program and implementation actions in response by management.

One item I wanted to comment on is the Ethics Hotline. It is best practice and industry standard for reports received by the third-party hotline provider (Lighthouse in this case) to go to the Internal Auditor for evaluation and dissemination, which ensures independence and protects confidentiality. See pages 7 through 9 of the FWA program document, which defines the role of the Internal Auditor as responsible for coordinating the FWA Program, monitoring, triaging complaints, conducting investigations, providing overall oversight as to the progress of complaints received, making reports, and performing follow-up procedures deemed appropriate.

Lighthouse will provide you with a form to input designate email addresses for dissemination purposes. You can provide my email address. I can also help you with ideas for building awareness of the program. For example, for City officials and staff, we typically provide training to the Council and senior management in person and prepare a recorded webcast that all employees can view. This makes it convenient to make this training a requirement (through new employee orientation and ongoing required training).

I look forward to discussing. Thanks very much.

Mark Steranka
Partner | **Moss Adams**
Business Consulting Services

999 Third Avenue, Suite 2800
Seattle, WA 98104
D (206) 302-6409
M (206) 890-3627

CONFIDENTIALITY NOTICE

This e-mail and any attachments are for the sole use of the intended recipients and contain information that may be confidential or legally privileged. If you have received this e-mail in error, please notify the sender by reply e-mail and delete the message. Any disclosure, copying, distribution, or use of this communication by someone other than the intended recipient is prohibited.