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# I. Statement from the Inspector General

It is an honor for me to present the fifth annual report of the Office of the Inspector General ("the Office"). The report details our efforts during fiscal year 2024, which covers the time period July 1, 2023 to June 30, 2024. This report is required under Section 3-14-111 of the Baltimore County Code, and its purpose is to summarize the work of the Office during the preceding fiscal year. The accomplishments highlighted in this report demonstrate the Office's ongoing commitment to increasing accountability and oversight in the operations of the Baltimore County government ("the County").

Since its inception, the Office has been committed to providing the highest level of service to the Baltimore County taxpayers. As part of that commitment, the Office underwent its first independent peer review by the Association of Inspectors General (AIG) in October 2023. While OIG offices must be in existence for at least three years to be eligible for such a review, the Office made its request to be peer reviewed in advance of meeting that eligibility. The purpose of the review was to measure the Office's adherence to the AIG's Principles and Standards for Offices of Inspector General. The scope of the review included the following areas: operations, work files and products, compliance with relevant policies and procedures, staff qualifications, adherence to professional training requirements, and relationships and communications with outside agencies. At the conclusion of the review, the AIG issued an Opinion Letter stating that the Office "met all relevant AIG standards for the period under review." In addition, the AIG issued a separate Management Letter to the Office highlighting areas of distinction and areas for consideration. Among the areas of distinction were the Office's "well-written policies and procedures that are thorough and provide clear direction to staff' as well as the Office's "wholeteam approach to its work products." The Management Letter also commended the Office for achieving full compliance with AIG standards after only three years in existence. Both the Opinion Letter and the Management Letter can be found on the Office's website under the "Learn About the Office" section. Finally, one of the ways that the AIG keeps the cost for peer review so minimal is by using volunteers from OIG offices that have already been peer reviewed to assist in future reviews. Since the Office has undergone this process, we will likely be asked to assist in future peer reviews of other OIG offices throughout the country.

In addition to our successful peer review, I am happy to report that fiscal year 2024 has been the Office's busiest year so far. The Office saw increases in the number of complaints received, cases opened, and reports issued when compared to fiscal year 2023. During this reporting period, the Office handled 277 complaints, opened 22 new investigations, and produced 11 reports. Of the 11 reports, six were issued to the public in the form of Investigative Reports and five were issued to the County's Administration in the form of Executive Management Referrals. As of the end of the fiscal year, the Office had two additional reports that were pending with the Administration. As of the release date of this annual report, one of those reports has already been issued to the public and the other may be released later in fiscal year 2025.

In addition to the increase in the Office's operational accomplishments, the Office also experienced growth in other areas. For instance, the Office hired its third investigator and filled a

new management analyst position to assist our investigators with their increasing workload. The Office's physical space also underwent an expansion to accommodate anticipated future growth. The Office would like to thank Property Management for their incredible efforts during the renovation project, which came in on time and under budget. The Office also continues to expand the number of members of its team who are certified by the AIG. During this fiscal year, the Office had yet another member of its team attend and pass the AIG's week-long Certified Inspector General Investigator course. The Office now has four employees who are certified members of the inspector general community. The Office's two newest employees will be attending the same training in fiscal year 2025. Finally, the Office hosted three interns from local law schools. The interns were given opportunities to work on a variety of projects. They conducted research, organized and analyzed evidence, observed interviews, and drafted documents in support of our reports. The Office looks forward to hosting more interns in the coming fiscal year.

I would be remiss if I did not highlight the important role that County employees and members of the public have played in the continued success of the Office during my tenure as your Inspector General. Time and again, dedicated County employees and hard-working citizens of Baltimore County have taken the time to report their concerns and to assist us in resolving complaints and advancing investigations. The overwhelming majority of County employees provide honest and diligent services to Baltimore County taxpayers and their work enhances the lives of all Baltimore County residents. I am humbled by your trust and support and honored to serve another year as Baltimore County's independent watchdog.

Respectfully,

Kelly Madigan

Kelly Madigan Inspector General

# II. Providing a Return on your Investment

For fiscal year 2024, the Office had a budget of \$835,042. Of that amount, the Office spent \$614,384. Approximately 94% of the spent budget was dedicated to the payment of salaries for the Office's six full-time employees. Also included in this year's budget was \$150,000 to fund the Office's access to independent legal counsel, which was a recommendation made by the Blue Ribbon Commission on Ethics and Accountability. The remaining funds were spent on a variety of items including software programs, office supplies, training, AIG membership fees, and travel pertaining to the peer review. Based on Baltimore County's population of 843,420,¹ the cost to operate the Office was approximately \$0.73 per resident, which is about the same cost as three, 25-cent gumballs.

In return for their investment of seventy-three cents in the Office, Baltimore County residents received reports on a wide range of issues. In August 2023, the Office issued an Investigative Report detailing a variety of issues within the Grinder Pump Section of the Department of Public Works and Transportation's Pumping and Treatment Division, which resulted in a lack of accountability and productivity among its personnel. In January 2024, the Office issued an Investigative Report detailing an employee's misuse of a Baltimore County vehicle, which wasted almost \$2,000 in County resources. In April 2024, the Office issued an Investigative Report detailing time and attendance fraud committed by an employee during at a minimum, the years 2022 and 2023. In June 2024, the Office issued an Investigative Report

detailing the County Administration's failure to notify County Council of three significant amendments to a 2008 contract regarding the purchase of radio equipment and parts for the 800 MHz communication system used by the County's 911 Center. Also in June 2024, the Office issued an Investigative Report summarizing six reports that had been delivered to the County Administration, three of which had never been made public, concerning the misuse of the County's electronic communications systems by eight employees during the 2021 to 2024 time period. purpose of this report was to highlight the Office's concern that the misuse of the County's computer system appeared to be ongoing, and that such conduct could jeopardize County data and the integrity of the County's information systems. The final Investigative Report issued in fiscal year 2024 detailed how a County-authorized residential trash hauler had been comingling its collected residential trash with commercial trash for at least five years, which caused an estimated loss to the County of \$224,737. In addition to these six public reports, the Office issued five internal reports, called Executive Management Referrals, which were delivered to the County's Administration.



<sup>&</sup>lt;sup>1</sup> See https://worldpopulationreview.com/us-counties/md/baltimore-county-population

# **III.** Inspector General

The primary function of the Office is to investigate allegations of fraud, waste, and abuse that concern County employees, vendors, and resources. Most of the Office's investigations are in response to complaints, which are received by the Office in several ways from a variety of sources. When appropriate, the Office publishes its findings in the form of Investigative Reports. These Reports are issued to the County's Administration, the County Council, other County stakeholders, and the public.

#### A. Office's Jurisdiction

The Office is only permitted to investigate matters within its jurisdiction. Determining jurisdiction is a two-step process. First, the Office assesses whether a complaint concerns a Baltimore County government employee, vendor, or resource. The Office does not have jurisdiction over any of the following, which are often the subject of complaints received by the Office: Baltimore County Public Schools, state and federal government programs, private attorneys, judges, family law matters, property disputes, fraud involving private citizens, or businesses that are based in Baltimore County. Second, the Office evaluates if the complaint involves an allegation of fraud, waste, or abuse.<sup>2</sup> The Office also takes into account whether investigating the complaint could result in better efficiency, accountability, or integrity within the County.

#### **B.** Business Process

The Office responds to complaints from current and former County employees, the public, and law enforcement partners. Complaints are received by the Office in a variety of ways: telephone calls, emails, letters, in-person meetings, and through the Office's online complaint form. The individual filing the complaint has the option to request anonymity. All complaints filed with the Office are carefully assessed to determine whether the complaint falls within the Office's jurisdiction, as previously described. This year, the Office received 277 complaints compared to 213 complaints in fiscal year 2023, which is an increase of 30%. Of the complaints received, 104 of them were within the Office's jurisdiction. That means 173 complaints were outside of the Office's jurisdiction and were either referred to another County agency (Agency Referrals), forwarded to an entity outside of Baltimore County government (External Referrals), or in some cases, both occurred (Dual Referrals).

If it is determined that the Office has jurisdiction over the complaint, a preliminary investigation is performed in an effort to validate the information. Whenever possible, the person making the complaint is interviewed so credibility and motivation can be assessed. Based on the results of a preliminary investigation, a determination is made to either convert the complaint to a

<sup>&</sup>lt;sup>2</sup> The Office interprets "abuse" as being synonymous with misconduct. The Office defines abuse as the use of County resources carelessly, extravagantly, or for a purpose that is not in the best interest of the County government or the citizens of Baltimore County. This includes incurring unnecessary costs from inefficient or ineffective practices, systems, or controls; or making decisions or choices in one's capacity as an employee that are excessive, improper, unethical, or otherwise detrimental to the County government or the citizens of Baltimore County.

full investigation or to administratively close the complaint. During fiscal year 2024, the Office converted 21 of its 277 complaints to full investigations. The Office also converted a complaint that had been pending at the end of fiscal year 2023 to a full investigation. This equated to a total of 22 investigations opened by the Office. The Office's complaint conversion rate this fiscal year was about 7.6%, which was only slightly lower than last year's conversion rate of 8.5%. In other words, for the last two fiscal years, about eight out of every 100 complaints received by the Office have turned into investigations.

During both the complaint assessment phase and the investigation phase, the overwhelming majority of the work performed by investigators involves communicating with County personnel on matters relevant to the complaint or investigation, whether that be via emails, phone calls, or in-person meetings; requesting records from County agencies as well as outside entities when applicable; organizing and analyzing those records for pertinent data; and conducting interviews. While this work mostly goes unnoticed by the public, it is critical to the success of the Office and serves as the foundation for our reports.

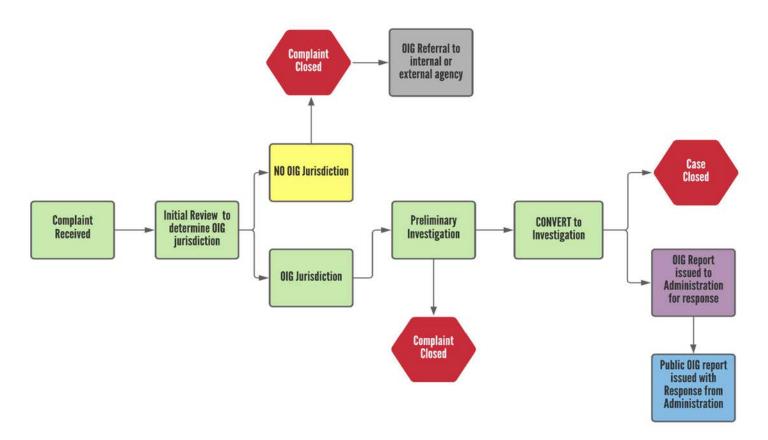


The Office conducts its investigations in accordance with a Policies and Procedures Manual ("the Manual") that was drafted and adopted during fiscal year 2021. The Manual has been periodically updated over the past few years. The Manual incorporates aspects of the AIG's Principles and Standards for Offices of Inspector General also known as *The Green Book*. At the

conclusion of an investigation, allegations that have been substantiated are summarized by the Office in an Investigative Report. Initially, the Investigative Report is distributed to the Administration, and when appropriate the County Council and other stakeholders, for review and a response. In some cases, the Office will issue a reply to that response. Subsequently, these documents are combined and published by the Office on its website. In fiscal year 2024, the Office published six Investigative Reports. The Office also has the discretion to publish the results of investigations in which the allegations are determined to be unsubstantiated or unresolved if the Office believes it is in the best interest of the public.

In some instances, the Office determines that while the County's Administration should be made aware of the results of the Office's investigations, the release of that information publicly is not necessary. This typically occurs with personnel-specific matters, such as those involving security-related issues. These findings are provided to the Administration in a memorandum called an Executive Management Referral. In fiscal year 2024, the Office issued five Executive Management Referrals to the Administration. Like with unsubstantiated or unresolved investigations, the Office has the discretion to publish the contents of an Executive Management Referral if warranted.

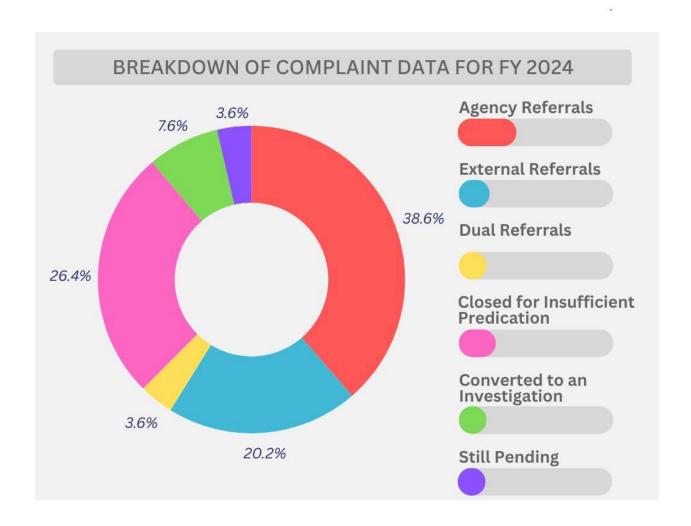
The following illustration depicts the business process of the Office from the receipt of the complaint to the publishing of a report:



# C. Statistics on Complaints

The following two charts summarize the disposition of the 277 complaints received by the Office in fiscal year 2024. It should be noted that two of the 73 complaints that were "Closed for Insufficient Predication" were actually merged into an existing investigation.

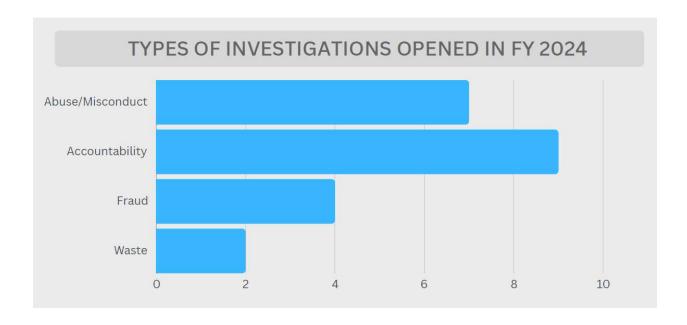
Agency	External	Dual	Closed for Insufficient Predication Investigation Resulted in an Executive Management Referral		Still	
Referrals	Referrals	Referrals			Pending	
107	56	10	73	21	0	10



## D. Statistics on Investigations

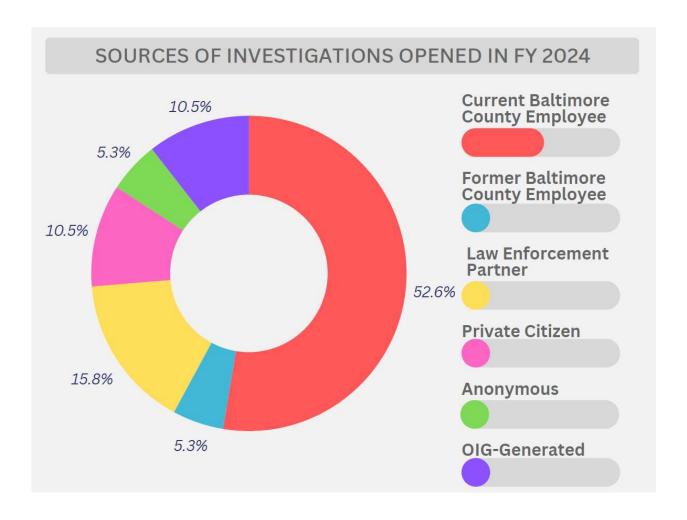
Listed below are two charts that provide statistics on the number and types of investigations handled by the Office in fiscal year 2024.

No. of Active Investigations as of 07/01/2023	No. of Investigations Opened During FY 2024	No. of Investigations Closed During FY 2024	No. of Active Investigations as of 06/30/2024	
12	22	17	17	



The following two charts show the sources of the investigations opened by the Office in fiscal year 2024. As seen in the charts, there are occasions in which the Office, during its work, becomes aware of information that is unrelated to an existing investigation but appears to be conduct that falls within the Office's jurisdiction and warrants further investigation. In those instances, the Office will open an "OIG-Generated" investigation.

Current Baltimore County Employee	Former Baltimore County Employee	Law Enforcement Partner	Private Citizen	Anonymous	OIG- Generated
15	0	0	3	1	3



# **E.** Investigative Reports

During fiscal year 2024, the Office issued Investigative Reports to the public covering a range of topics. Brief summaries of these Investigative Reports are listed below.<sup>4</sup>

<sup>&</sup>lt;sup>4</sup> All of the Investigative Reports are available at www.baltimorecountymd.gov/departments/inspectorgeneral/.

#### Case No. 23-010

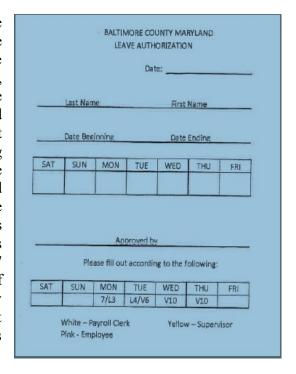
In August 2023, the Office issued an Investigative Report detailing the Office's examination of certain employees' activities over a three-month period within the Grinder Pump Section of the Department of Public Works and Transportation's Pumping and Treatment Division, which is part of the Bureau of Utilities. During its review, the Office found that from January 1, 2023 to March 31, 2023, there were various inefficient and inconsistent practices employed among the subject employees within the Grinder Pump Section. There was also a failure on the part of management to enforce certain County policies that could have identified these detrimental practices. This lack of oversight by management resulted in the employees being unaccountable for significant portions of their day. The combination of these issues resulted in an overall lack of productivity, which came at a financial cost to the County.

## Case No. 24-002

In January 2024, the Office issued an Investigative Report regarding the misuse of a Baltimore County dump truck by a Bureau of Highways employee. The misuse of the vehicle occurred on 47 occasions between December 2021 and July 2023. The majority of the misuse involved the employee driving the dump truck to their home, which was located outside of Baltimore County, where they spent significant amounts of time during the workday for purposes unrelated to their assigned duties. The Office calculated that the employee's actions resulted in almost 1,400 miles being unnecessarily added to the vehicle. Between the fuel costs and the lost labor hours associated with the conduct, the Office estimated that the employee wasted almost \$2,000 in County resources.

#### Case No. 23-019

In April 2024, the Office issued an Investigative Report concerning a Bureau of Highways employee whose duties included maintaining time and attendance records for the employees in one of the Highway Shops, including their own time and attendance. Based on the Office's findings, it was determined that the employee had been committing time and attendance fraud during at least the 2022-2023 timeframe. The fraud included submitting 27 different leave slips, which were approved by the employee's supervisor and for which the Office believed the employee actually took the leave. However, the employee did not record the time off in the County's official timekeeping system. As a result, the employee's leave balances were never reduced for those 27 occurrences of leave. Because there was a lack of oversight of the employee and no one was actively monitoring the employee's activities, the fraud was not uncovered until the matter was brought to the Office's attention through an anonymous tip.



#### Case No. 24-014

In June 2024, the Office issued an Investigative Report regarding the County Administration's failure to notify County Council of three amendments to a 2008 contract regarding the purchase of radio equipment and parts for the 800 MHz communication system used by the County's 911 Center. The amendments in question took place in 2017, 2019, and 2022. Because the amendments were considered material changes to the original agreement, they should have been communicated by the Administration to the County Council via the established correspondence process that exists between the two branches of government. Because such notifications did not occur, the Administration violated Section 902(f) of the County Charter and Section 13.3 of the County's Purchasing Manual. From a practical standpoint, the notification failures deprived County Council of the opportunity to question three successive changes to a multimillion-dollar contract, each of which extended the term of the contract or increased the compensation that could be awarded to the vendor pursuant to the contract.

#### Case No. 24-010

In June 2024, the Office issued an Investigative Report detailing the fact that over approximately the past three years, the Office has delivered six reports to the County Administration, three of which were made available to the public, detailing different types of misuse of the County's computer system by various County employees. Pursuant to those reports, the Office made several recommendations related to raising employee awareness of the County's information technology policies as well as each employee's obligation to abide by those policies. Despite those recommendations, the misuse appears to be ongoing.

#### Case No. 23-004

In June 2024, the Office issued an Investigative Report regarding a County authorized residential trash hauler who, for at least five years, had been comingling its collected residential trash with commercial trash and fraudulently representing it all as residential trash. The purpose of the fraud scheme was to avoid paying a per ton commercial trash tipping fee to a third-party hauler who was contracted by the County to transfer such commercial trash out of the County. The fraud resulted in lost profits to the third-party hauler as well as a loss to the County in that the comingled commercial and residential trash, which the County believed at the time was all residential trash, essentially caused the County to inadvertently landfill more trash at its Eastern Sanitary Landfill than it needed to. The loss to the County was estimated to be \$224,737.



## F. Executive Management Referrals

During fiscal year 2024, the Office issued Executive Management Referrals on various issues to the County's Administration. Brief summaries of these Referrals are listed below.

#### Case No. 23-018

In August 2023, an Executive Management Referral was delivered to the Administration detailing information about an employee who had filed a grievance due to their recent termination.

#### Case No. 23-014

In September 2023, an Executive Management Referral was delivered to the Administration regarding inconsistencies as to how the Health Insurance Portability and Accountability Act (HIPAA) tests were being administered within the Baltimore County Department of Health. The investigation revealed several test administrators aided new employees with test completion to ensure passing scores before submitting the tests to be graded. Further, another test administrator provided answers to the test to a new employee after that employee failed their first attempt.

#### Case No. 23-197

In November 2023, an Executive Management Referral was delivered to the Administration detailing an investigation by federal law enforcement partners that identified a County 911 Communication employee who shared law enforcement information with a member of a drug trafficking organization.

## Case No. 23-017

In February 2024, the Office issued an Executive Management Referral to the County Administration concerning how a high-level County official and two of their subordinates had misused the County computer system to prepare and store non-County related documents. Further, all three individuals had misused their County email accounts to transmit personal data to one another as well as to others outside of the County. In addition, the investigation uncovered that two of the three employees had attached personally owned, unauthorized USB drives to their respective County-issued computers.

#### Case No. 24-003

In February 2024, an Executive Management Referral was delivered to the Administration detailing the investigation of a complaint that various employees within the Department of Corrections were "acting" in certain managerial positions and receiving additional compensation for serving in those roles in violation of County policy.

# IV. Outcomes Related to the Issuance of Prior Reports

One of the most important aspects of the Office's work is effecting change in the County. One of the primary ways the Office accomplishes this is by highlighting issues in our reports and when appropriate, making recommendations to the Administration based on our findings. In their formal responses, the Administration indicates whether they intend to implement any changes to address the concerns raised by the Office. In keeping with the Office's mission to promote accountability, the Office follows up with the Administration periodically to see if those changes were indeed put into place. In addition, because the Office sends courtesy copies of our reports to County Council, there have been times when the Council has passed legislation to address a matter that has been the focus of one of our reports. Finally, there are occasions when the Office refers its findings to an outside agency for whatever action they deem appropriate under the circumstances.

To date, the Office has made 47 recommendations to the Administration over the course of 36 reports. Of those recommendations, 30 have been either implemented or are in the process of being implemented. In addition, some of the remaining 17 recommendations are still under consideration. Also, there have been five other occasions where the Office's reports, while not containing specific recommendations, resulted in positive changes within the County. Listed below are examples of how the Office's past work translated into impactful changes during fiscal year 2024. For a full list of such changes, please consult the Office's website.

- In September 2021, the Office issued Investigative Report 21-002, which detailed concerns about the Group Leadership Program operated by the County's Department of Recreation and Parks. Among the concerns were that 18 of the entities participating in the Group Leadership Program owed the County \$139,021.63. Further, that figure had been as high as \$420,353.13 about three months earlier. In the report, the Office highlighted that the County had no formal plan in place to collect these outstanding funds and that there were aspects of the Program that were contributing to the deficit balances as well as creating other financial issues for the County. Subsequent to the Office's report, the County made a concerted effort to collect the outstanding funds and by August 7, 2023, all of the balances owed had been paid. As of July 1, 2024, the Group Leadership Program had been terminated by the County.
- In May 2022, the Office issued Investigative Report 20-002-1, which detailed how on two occasions, an employee assigned to Property Management disclosed aspects of an on-call plumbing contractor's bid to another on-call plumbing contractor prior to the bid closing in violation of the County's procurement rules. On both occasions, the plumbing contractor that received the bid-related information from the employee was awarded the project. During its investigation, the Office determined that Property Management did not have any formal policies and procedures concerning the handling of bid solicitations and proposals for on-call contractors. Therefore, the Office recommended that Property Management adopt a set of formal policies and procedures. In addition, the Office recommended that additional training be given to employees whose duties and responsibilities include procurement-related activities. During fiscal year 2024, Property Management established a set of formal policies and procedures

- as well as implemented training specific to staff who handle contract-related matters on behalf of the County.
- In August 2023, the Office issued Investigative Report 23-010, which concerned certain employees in the Grinder Pump Section of the Department of Public Works and Transportation's Bureau of Utilities not being accountable for significant portions of their day. Among the recommendations made by the Office in the report were that specific policies and procedures be implemented in the Bureau of Utilities to address the use of NexTraq, the GPS-based fleet tracking system used by the County. The Office also recommended that all supervisors in the Bureau of Utilities, who manage operational personnel, have NexTrag accounts and be trained on how to run reports that can assist with monitoring employee activities. The Office also suggested that managers in the Bureau of Utilities start utilizing the report function of Cityworks, the program used by the County to manage work orders and service requests, to track productivity, and that standard practices for completing work orders be implemented. During fiscal year 2024, the Department of Public Works and Transportation instituted a Vehicle Usage Policy across all of its agencies to include the Bureau of Utilities. Also, the training of all Bureau of Utilities staff on the usage of NexTrag occurred. The Bureau of Utilities also created a report in Cityworks to identify open work orders and to manage workload among personnel. Finally, standard operating procedures were created to ensure that work orders are handled uniformly among staff.
- In September 2023, an Executive Management Referral was delivered to the Administration regarding inconsistencies as to how HIPAA tests were being administered within the Department of Health. Further, there were concerns about personnel cheating on the test. Among the recommendations made by the Office were that the HIPAA test be redesigned to ensure employees are truly appreciating the importance of HIPAA, their role in protecting individuals' health information, and the ramifications to the County of violating HIPAA. During fiscal year 2024, the County's Privacy Officer took over the administration of the HIPAA exam. As part of that process, the Privacy Officer modified the HIPAA exam, and they have committed to updating the exam periodically. Further, the answer key to the HIPAA exam will only be possessed by the Privacy Officer and their backup to minimize the risk of cheating.
- In January 2024, the Office issued Investigative Report 24-002 about a Bureau of Highways employee who had misused their assigned County dump truck over an extended period of time. In the report, the Office recommended the Bureau of Highways implement a vehicle usage policy that employees must sign prior to being issued a vehicle. The Office suggested the Bureau of Highways consider having its employees reacknowledge the policy every year as part of the annual performance appraisal process. Finally, the Office recommended that the crew chiefs in Highways have access to NexTraq so that they can monitor their crewmembers as needed. By December 2023, all of the crew chiefs in Highways had been given access to NexTraq, and as noted earlier, the Department of Public Works and Transportation implemented a Vehicle Usage Policy that was being distributed and acknowledged by its employees.

## V. Goals for Fiscal Year 2025

The Office has several goals for fiscal year 2025. In the coming fiscal year, the Office intends to implement a new annual training course that all County employees will be required to take concerning the Office. The training will provide employees with information about the Office's mission and jurisdiction, its business processes, an employee's duty to cooperate with the Office, and an employee's affirmative duty to report fraud, waste, and abuse in good faith. From a personnel standpoint, the Office hopes to get its two newest employees certified by the AIG as Certified Inspector General Investigators. The Office also will remain committed to ensuring all of its employees are afforded access to relevant and informative training such that their skills and knowledge base can be enhanced and expanded. Operationally, the Office intends to continue its pursuit of investigations that will have a positive monetary impact on the County. The Office also intends to work closely with the Office of Information Technology to make enhancements to its automated case management system, which was implemented this fiscal year. Finally, the Office will continue its outreach within County agencies and local communities to improve awareness of the Office and its mission. This will be done with the hope that we can have yet another year of positively effecting the County and providing its citizens with a return on their investment in us.

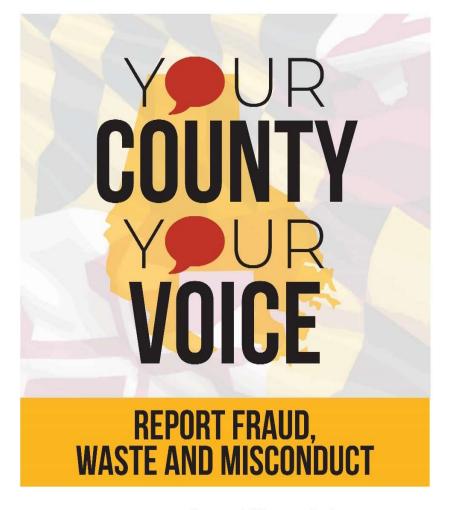
## VI. Contact the Office

Please contact the Office using one of the methods below if you have any questions about this report, the Office and its mission, or if you have a complaint that could be addressed by our Office. We look forward to hearing from you.

Website: www.baltimorecountymd.gov/departments/inspectorgeneral/

Email: inspectorgeneral@baltimorecountymd.gov

Mail: Office of the Inspector General 400 Washington Avenue, T-105 Towson, Maryland 21204 Tip Line: 410-887-6500



Contact the Office of the Inspector General Tip Line:

410-887-6500

InspectorGeneral@BaltimoreCountyMD.gov



