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CITY OF LAUDERHILL



ADMINISTRATION
Charles Faranda, CM
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Kennie Hobbs, Jr., ACM

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Earl Hall, Esq.

CITY CLERK
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CHARLES FARANDA
City Manager

December 10, 2015

Inspector General John W. Scott
Broward Office of the Inspector General
One North University Drive, Suite 111
Plantation, Florida 33324

Re: Ref. OIG 14-023

Mr. Scott:

I submit this correspondence on behalf of the City of Lauderhill as requested in the Memorandum from the Broward Office of the Inspector General dated October 7, 2015. In the Conclusion and Recommendations Section of the Memorandum, the OIG proposed five corrective actions and requested a status report from the City of Lauderhill in regard to independent steps the City would take to prevent future misconduct by City employees and determine if the LHA management practices are sufficient to ensure the proper use of public monies entrusted by the City.

First, the City of Lauderhill joins the OIG in the mission to ensure the public trust and to protect the use of public resources. Accordingly, the City will continue to endeavor to protect and maintain the public trust and protect public resources.

With regard to the five corrective actions requested, although these deal more specifically with the manner in which the LHA conducts itself and is therefore not within the direct control of the City, the city clerk, the city attorney and I will make ourselves available to meet with, offer advice and proffer policies and procedures to assist the Board, Senior Management and Staff of the LHA to ensure that all of these issues are addressed. I have proposed the first such meeting for the first quarter of 2016 and will offer to meet as necessary thereafter.

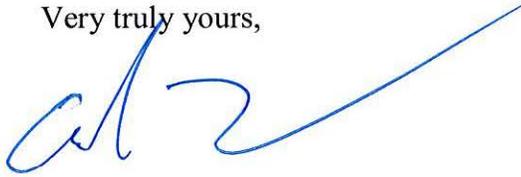
In regard to independent steps the City can take to prevent future misconduct by City employees, please be advised that effective January 15, 2015, I enacted the enclosed Conflict of Interest Policy for all city employees. The adopted policy will ensure that city employees are made aware of the conflict of interest policy. The policy further requires employees to notify a supervisor in the event of a potential conflict so that the matter is promptly presented to Human Resources Department.

In regard to the LHA management practices, as referenced above, the charter officers from the city will meet with the LHA Board, Senior Management and Staff to offer advice and proffer

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INSPECTOR GENERAL

polices to assist management and staff of the LHA. In addition, in all future agreements, I will require that the LHA provide an annual report to the City Commission at a public meeting that details the use of public funds entrusted to the LHA.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'CF', with a long, sweeping horizontal line extending to the right.

CHARLES FARANDA
City Manager

cc: Mayor Kaplan & City Commissioners



**Administrative
Policies & Procedures
Manual**

Subject:

**HUMAN RESOURCES
CONFLICT OF INTEREST**

Number:
HR-42

Revisions:

Effective Date:
01/08/15

Page:

1 of 3

Supersedes:

Approved By:

Charles Faranda, Jr., City Manager

HR – 42.0 PURPOSE:

The purpose of this policy is to provide guidelines to City employees to ensure that they conduct City business in manner that is free of actual or apparent conflicts of interest that would compromise the principles of objective, fair and equitable treatment of all City employees.

HR – 42.1 DEFINITIONS:

- **Employee:** Any paid employee of the City (whether full-time, part-time, hourly, seasonal or temporary).
- **Immediate Family Member:** relatives of the employee and/or the employee's spouse, father, mother, sister, brother, husband, wife or child, step-mother, step-father, step-child, grandparents, grandchildren, great grandparents and great grandchildren. This also includes adoptive relationships.
- **Personal Relationship:** A romantic relationship between persons who date, cohabitate (i.e., reside together), or engage in sexual activity with one another.
- **Conflict of interest:** A conflict exists whenever personal, professional, commercial or financial interests or activities outside of the City have the possibility (either in actuality or appearance) of:
 1. Interfering with an employee's ability to fulfill his or her employment obligations;
 2. Compromising or giving the appearance of compromising an employee's professional judgment; or
 3. Resulting in personal gain for the employee, the employee's immediate family, or a person with whom the employee is involved in a personal relationship, at the expense of the City or its residents.

HR – 42.2 POLICY:

The City strives to ensure that City business is conducted in a manner that is free of potential or actual conflicts of interest. Conflicts of interest should be avoided where possible and otherwise disclosed and managed.

A conflict of interest arises when a City employee is or may be in a position to influence the City's business in ways that could lead to a form of personal gain for the employee, the employee's immediate family members, or persons with whom the employee is involved in a personal relationship.

The following are examples of conflicts of interest which are prohibited under this policy:

- Unless otherwise authorized by the City's policies and procedures, employees who would benefit personally from the supplying of goods or services to the City by a prospective vendor may not participate in the decision-making process leading to the choice of that vendor. If an employee's immediate family member or an individual with whom the employee is involved in a personal relationship has an ownership interest in the vendor's company or has a significant executive position in such company or other remunerative relationship with the company, that employee is also disqualified from the selection process for that vendor, including but not limited to recommending the vendor or drafting specifications for the goods or services to be provided by the vendor.
- Employees who have a significant executive position (for e.g., a board position, oversight, approval/disapproval authority) with any City-run or City-sponsored agencies may not request or accept any gratuities, favors, or anything of monetary value (such as loans) from such entities.

If an employee believes he or she has an actual or potential conflict of interest, he or she must bring it to the attention of his or her supervisor, who in turn must inform the Human Resources Department ("Human Resources"). Such disclosures will then be reported by Human Resources to the City Manager, who will determine how the conflict is to be resolved. Exceptions to this policy may only be made by the City Manager. For example, this policy does not prevent employees who sit on panels seeking bids for employee insurance benefits from availing themselves of such benefits from the selected vendor. Exceptions will only be made if doing so would promote the best interests of the City and its residents. Violations of this policy may lead to disciplinary action, up to and including termination from City employment.

ACKNOWLEDGEMENT OF RECEIPT

I hereby acknowledge that I have read and understood the foregoing policy, rules and conditions concerning **Conflict of Interest**. I understand that a violation of the Policy **(HR-42)** or any Human Resources policy may result in disciplinary action, including possible termination, and/or legal action.

Signature

Print Name

Date

Witnessed (Human Resources Representative)

Date