



OFFICE OF THE INSPECTOR GENERAL
Isabel Mercedes Cumming, Inspector General
City Hall, Suite 635
100 N. Holliday Street
Baltimore, MD 21202



July 9, 2021

City Solicitor Jim Shea
Chair, Inspector General Advisory Board
City Hall, Suite 100
100 N. Holliday Street
Baltimore, MD 21202

Dear Chairman Shea:

I would like to place on the record recent concerns that arose in Baltimore County surrounding a bill that would establish an advisory board for the County's Inspector General. Similar issues may directly impact the City's Inspector General Advisory Board ("the Board"), which will be meeting for the first time in the next few days.

In the interest of full disclosure and transparency, I am a Certified Inspector General and an elected member of the Board of the Association of Inspectors General (AIG), but I did not take part, nor was I consulted, in writing the attached AIG letter. The President of the AIG sent this letter to the Baltimore County Executive and members of the County Council to inform them of significant issues with the proposed bill that conflicted with well-established Inspector General standards.

The composition of an oversight body that is comprised of elected officials and other politically appointed persons, who do not possess the requisite knowledge, skills, training or experience in the field of inspections and oversight does not provide actual independence and objectivity from the governmental body.

The Board has five members who are all part of City government. This impacts the independence and autonomy of the Office of the Inspector General ("OIG"), whose jurisdiction includes investigating potential wrongdoing by these very officials and their departments. Indeed, there are members of the Board who are or have been part of OIG investigations. For these same individuals to sit on a board tasked with evaluating the Inspector General's performance at the very least creates an appearance of bias, and could hinder the OIG from doing its job with the specter of improper political pressure. That perception could cast doubt on the independence of the OIG and deter citizens and employees from coming forward with information about suspected fraud, waste, and abuse.

These are important issues that I ask you as the Chairman of the Board to include on the agenda for discussion at the Board's first ever meeting, set to take place on July 13, 2021.

Sincerely yours,

Isabel Mercedes Cumming
Inspector General

Attachment: Letter dated 7/5/2021 from the AIG

REPORT FRAUD, WASTE AND ABUSE

HOTLINE: 443-984-3476/800-417-0430

EMAIL: OIG@BALTIMORECITY.GOV

WEBSITE: OIG.BALTIMORECITY.GOV

cc: Michael Huber, Chief of Staff
Councilwoman Sharon Middleton
Councilman Eric Costello
Deputy Comptroller Erika
Dean Donald Tobin
Dean Ronald Weich

REPORT FRAUD, WASTE AND ABUSE

HOTLINE: 443-984-3476/800-417-0430

EMAIL: OIG@BALTIMORECITY.GOV

WEBSITE: OIG.BALTIMORECITY.GOV



ASSOCIATION OF INSPECTORS GENERAL

524 West 59th Street, 53334HH
New York, NY, 10019
(917) 460-7898

Stephen B. Street, Jr.
President

Gregory L. Hill
Executive Director

July 5, 2021

OPEN LETTER TO BALTIMORE COUNTY EXECUTIVE AND COUNTY COUNCIL

The Honorable Johnny Olszewski, County Executive
The Honorable Tom Quirk, Council District 1
The Honorable Izzy Patoka, Council District 2
The Honorable Wade Kach, Council District 3
The Honorable Julian E. Jones, Jr, Council Chairman & Council District 4
The Honorable David Marks, Council District 5
The Honorable Cathy Bevins, Council District 6
The Honorable Todd K. Crandell, Council District 7

400 Washington Avenue
Towson, MD 21204

Re: Proposed Bill concerning the Office of the Inspector General

Honorable County Executive Olszewski and Council Members:

The Association of Inspectors General (AIG), is an independent, non-partisan 501(c)(3) organization representing thousands of members working in hundreds of Inspectors General offices across the United States and internationally. The AIG was recently provided a copy of a proposed bill related to the Baltimore County Office of Inspector General and was asked to respond to its content. As the bill has not yet been formally introduced, we will qualify our comments as being based solely upon the copy that was provided. Transparency, accountability and integrity are essential principles and vital to any government's credibility with its citizenry.

Having reviewed the proposed (unintroduced) bill, the Association of Inspectors General has grave concerns regarding its language and structure. We strongly recommend that the proposed bill be re-evaluated and that Baltimore County government proceed with careful deliberation and caution on any such proposed legislation. We would like to point out three preliminary issues that stand out and are contrary to the well-established *Principles and Standards for Offices of Inspector General* that have been in place for more than two decades:

Open Letter Baltimore County Executive and County Council

July 5, 2021

Page 2 of 2

- 1.** The composition of an oversight body that is comprised of elected officials and other politically-appointed persons, who do not possess the requisite knowledge, skills, training or experience in the field of inspections and oversight does not provide actual independence and objectivity from the governmental body.
- 2.** An oversight body with excessive authority and powers over the operations of the Office of the Inspector General that effectively gag and shackle the Inspector General from conducting independent investigations for the ultimate benefit of the citizens of Baltimore County.
- 3.** The implementation of funding, policy and procedural control mechanisms that remove the authority of the Inspector General and place it into the hands of a politically oriented oversight body. Such mechanisms are easily weaponized to influence, intimidate or directly hinder audits, investigations and other actions that are not to the liking of a government or its administration.

The AIG knows from long experience that these issues are not unique to Baltimore County, but have manifested in various forms throughout the country wherever Inspectors General exist. Like those in any democratic society, the citizens of Baltimore County deserve and expect that their government will serve their best interest, and also be transparent and accountable to the public. The proposed bill in its present form, should it become law, will deprive the Inspector General of the ability to fulfill its mission and the independence that it must have in order to be effective. The end result would be the mere appearance of oversight, which is much worse than no oversight at all.

The AIG possesses the experience and expertise in navigating these complex issues and, as a non-partisan and not-for-profit organization, stands ready to assist or provide a more detailed analysis.

With Best Regards, I am

Respectfully,



Stephen B. Street, Jr.
President, Association of Inspectors General

SS/gh/dm

cc: Kelly Madigan, Baltimore County Inspector General