

Ethics Training for Miami Beach Regulatory Employees

Final Report of the Miami-Dade County Commission on Ethics and Public Trust



February 3, 2014

INTRODUCTION

During May 2012, former Miami Beach City Manager Jorge Gonzalez approached Miami-Dade Commission on Ethics (COE) staff to discuss the City's retention of the staff to provide an intensive ethics training program for its regulatory employees. The employees in question consisted of approximately 250 City employees whose jobs involved regular interaction with private-sector individuals and business entities in connection with matters subject to direct regulation by City personnel. The departments that would be involved in the program included Building, Code Compliance, Fire Rescue/Inspection, Planning, Parking Enforcement, Procurement and Finance.

The motivation for the proposal arose out of several criminal cases involving City employees in several of these departments. While the City has previously provided basic ethics training for its employees, the Manager was at that time interested in a more extensive program designed for and tailored to the particular circumstances of these employees.

Following the overture by the City Manager, the Commission staff prepared and submitted a nine-stage proposal for ethics training for the City employees and supervisors engaged in regulatory enforcement. The proposal was designed to be conducted over approximately six months and included six separate sessions on various ethics-related topics for presentation to all of the targeted employees in classes not to exceed 50. A seventh "Train the Trainer" session was to be designed for and presented to the supervisory personnel, all of whom would have attended the prior six sessions. The eighth step was to consist of private, confidential, one-on-one interviews with each employee. The final step would be a report summarizing the training sessions and including an analysis of the one-on-one session results together with recommendations for further action by the City.

On April 10, 2013, an Inter-local Agreement was concluded between the City of Miami Beach and Miami-Dade County for the provision of the proposed training program by Ethics Commission staff at the City's employee training facilities adjacent to City Hall. The sessions would be coordinated by Dr. Leslie Rosenfeld, Organizational Development Coordinator for the City of Miami Beach.

The program has now been completed upon the presentation of this report. The Commission on Ethics wishes to thank the Miami Beach City Commission, former City Manager Jorge Gonzalez, former interim Manager Kathie Brooks, and current Manager Jimmy Morales, as well as Dr. Rosenfeld, for their sponsorship and support of an innovative program for ethics training of public employees.

SESSION 1 – Introduction to Ethics

During the week of May 13, 2013, five one-hour introductory sessions were conducted, focusing on public service ethics, government organizational culture, and professionalism. The sessions were conducted by COE Executive Director Joseph Centorino and COE Communications Director Rhonda Victor Sibilia.

The session included an introduction to Ethics Commission jurisdiction, investigative and enforcement procedures, as well as its outreach and opinion functions. Several philosophical approaches to ethics, including ends-based, rule-based, and care-based thinking, and the meaning of integrity were discussed and also applied to factual ethical dilemmas. The participants were encouraged to engage in interactive discussion and debate with each other as well as with the session moderators. The session was intended to impress upon the participants the special ethical responsibilities of public servants, and the importance of carefully thinking through difficult ethical issues before deciding to act.

SESSION 2 – Ethics Code Provisions

During the week of June 17, 2013, five four-hour sessions were conducted covering the requirements of the Miami-Dade County Conflict of Interest and Code of Ethics Ordinance and the City of Miami Beach Code of Ethics Ordinance. The sessions were conducted by COE Deputy General Counsel Miriam Ramos and Senior Staff Attorney Victoria Frigo.

This was the longest session of the entire program and included a comprehensive PowerPoint presentation of County and City ethics code requirements and policies. These included ordinance provisions on Gifts, Financial Disclosure, Lobbying, Exploitation of Official Position, Code of Silence, Conflicts of Interest, Outside Employment, and Nepotism.

Emphasis was placed upon subjects particularly relevant to regulatory personnel such as the Gift, Conflict of Interest, and Exploitation provisions. The local City of Miami Beach ordinances were included where the provisions were stricter than the standards set by the County Code. Multiple choice and true/false question were utilized to quiz employees on the rules, and case studies used to illustrate some of the provisions.

SESSION 3 – Penalties and Consequences

During the week of July 29, 2013, there were five 1 ½ hour sessions covering the administrative and legal penalties imposed for ethical or criminal violations of ordinances and statutes pertaining to misconduct by public servants. These sessions were conducted by COE Advocate Michael Murawski, and included a live PowerPoint presentation, as well as a videotaped

interview of Mr. Mohammed Partovi, a former Chief Structural Plans Examiner for the City of Miami Beach Building Department, who had been convicted on corruption charges.

The PowerPoint presentation on penalties included a review of the non-criminal penalties available under the Miami-Dade County and City of Miami Beach Ethics Codes for violations — fines, restitution, reprimands or letters of instruction, removal from office, increased fines for intentional or repeat offenses. The consequences under state law for felony or misdemeanor convictions on public corruption charges—including incarceration, fines and loss of public pension — were also explained.

The taped Partovi segment showed a former high-level employee of the City, who had been convicted of taking bribes from a Miami Beach developer in 2011. He was interviewed by COE Executive Director Joseph Centorino. Mr. Centorino, who was previously employed as an Assistant State Attorney by the Miami-Dade State Attorney’s Office, had served as the prosecutor in Mr. Partovi’s criminal case.

Mr. Partovi recounted how he had been caught accepting money in connection with his City position, leading to his arrest, conviction, incarceration and probation that followed the completion of his jail sentence. He described the experience of being arrested in his home, sharing a cell with hardened criminals, the loss of his job, humiliation of his family, professional and financial hardships. He ended the interview with a somber plea to his former co-workers to refrain from engaging in the conduct for which he was prosecuted.

SESSION 4 – The Law of Bribery

During the week of August 26, 2013, there were five one-hour sessions held covering the law of Bribery. In a PowerPoint presentation titled “Eight Ways to Bribery,” COE Executive Director Joseph Centorino covered the definition of Bribery, several major historic criminal cases involving bribes or similar crimes, and eight major factual scenarios or legal theories of the crime of Bribery. These included The Prospective *Quid Pro Quo*, The Kickback, Extortion, Gifts with Strings Attached, Grease Payments, Pay-to-Play Campaign Contributions, Intangible Favors, and Deprivation of Honest Services.

Examples of local federal and state prosecutions were used to illustrate the various theories and statutes. The session concluded with two short videos showing police recordings of actual bribe payments. One involved a former GSA Director in the City of Miami. The second showed the former Miami Beach Chief Electrical Inspector accepting a bribe in a Miami Beach coffee shop.

SESSION 5 – Application of Legal Provisions to Real Life Scenarios

During the week of September 23, 2013, there were five two-hour sessions held during which hypothetical Miami Beach scenarios drawn from actual cases or investigations in Miami-Dade County were utilized to dramatize and illustrate various ethics code violations and criminal offenses covered in the prior sessions. The scenarios were created specifically for this training program and were presented and discussed by Executive Director Joseph Centorino and Staff Attorney Gilma Diaz-Greco.

There were six factual scenarios prepared for the sessions, each drawing upon realistic facts surrounding a hypothetical Miami Beach regulatory employee facing serious ethical dilemmas. The six scenarios included fact patterns involving a building inspector, a code compliance officer, a fire inspector, a parking enforcement official, a city planner, and a building department cashier. In each session, four scenarios were selected from among the six and assigned to groups of five to seven employees. They were asked to discuss them, respond to questions, and engage in discussion designed to reinforce their knowledge of ethical precepts, legal provisions, and their ability to make sound ethical judgments when faced with ethically challenging situations.

One member of the group was designated to present the views of the group, but all employees were encouraged to participate in the general discussion that followed. The scenarios produced lively discussions and spirited debates over possible responses to the ethical dilemmas presented. The moderators challenged the employees to justify and explain their positions, and pointed to relevant code provisions for guidance whenever appropriate.

SESSION 6 – Local Enforcement Issues

During the week of October 28, 2013, four one-hour sessions were held focusing on the special integrity challenges facing regulatory employees in the Miami Beach community. The presentations were made by Executive Director Joseph Centorino and Communications Director Rhonda Victor Sibilia, and included a videotaped interview with former Miami Beach Code Compliance Director Al Childress.

The session opened with a PowerPoint presentation by Mr. Centorino in which the “Bottleneck Problem” was discussed. This is a paradigm for corrupt practices developed by Professor Michael Johnston of Colgate University in his book, *Political Corruption and Public Policy in America*, wherein the interests of a large volume of private parties with substantial resources (developers, contractors, property owners, citizens) are served by a relatively small group of local government regulatory employees with limited time and resources. The paradigm was analogized and applied to the regulatory environment in the City of Miami Beach.

This was followed by the showing of the videotaped interview of Al Childress by Ms. Sibilina, in which Childress recounted some of his experiences while serving as Code Compliance Director in Miami Beach during the 1990's. He explained how he faced and dealt with the special challenges to the integrity of his employees in the Miami Beach regulatory environment during his time with the City.

The sessions ended with a presentation and discussion of personal vs. impersonal styles of public administration and the ethical implications of each style.

SESSION 7 – Train the Trainer

A two-hour “Train the Trainer” session for Miami Beach supervisors in regulatory departments was held on November 18, 2013. The session consisted of a panel discussion moderated by COE Deputy General Counsel Miriam Ramos. The four panelists were Charlie Danger, Miami-Dade County Building Official; Oriol Haage, Training and Certification Officer, Miami-Dade Building Department; Michael Goolsby, Division Director, Miami-Dade County Boards and Code Administration; Jimmy Morales, Miami Beach City Manager. More than 50 supervisors attended the session.

This panel, with decades of regulatory and supervisory experience among its members, was organized to provide personal views on how to best build an ethical organizational culture; to provide tips on strategies to prevent regulatory employees from giving in to the temptations that often accompany their jobs; and balancing the need to do enforce regulations “by the book” along with the necessity of being attentive to the customer service end of regulatory roles.

The panel members described specific instances of employee misconduct and/or corruption encountered during their varied experiences and the techniques they used to cope with them. City Manager Morales gave a broad perspective on the issue of corruption in government from his service as Miami-Dade County Commissioner, City Attorney for the City of Doral, and Miami Beach City Manager. The session included a question and answer segment, which focused on current issues of concern to the supervisors.

SESSION 8 – One-on-one Interviews

During the week of December 9, 2013, all of the employees involved in the program were provided with the opportunity to speak one-on-one with a COE staff member to discuss their views on corruption and unethical behavior in their departments and in the City of Miami Beach as a whole. Of the approximately 250 regulatory employees, 203 participated in the individual interviews. COE staff members conducting the interviews included Executive Director Joseph Centorino, Commission Advocate Michael Murawski, Deputy General Counsel Miriam Ramos,

Staff Attorney Gilma Diaz-Greco, Communications Director Rhonda Victor Sibia, Outreach Coordinator Robert Thompson, Forensic Accountant/Investigator Karl Ross, and Investigators Sylvia Batista, Manuel Diaz, Larry Lebowitz, Breno Penichet, and Robert Steinback.

Each interview was comprised of 23 questions, among which were questions calling for the employee to provide ethical ratings of their departments, colleagues, supervisors and City government; to reveal whether they had ever been offered a bribe; to assess their comfort level in reporting wrongdoing; and to provide suggestions for improving the efficiency and ethics of the City government. A copy of the questionnaire is include at the end of the report.

Three types of questions were utilized: 1) questions asking employees to rate certain aspects of their employment on a scale of 1 to 10, with ten being the highest rating; 2) questions calling for a yes or no answer, with an opportunity to explain if desired; 3) open-ended questions, permitting the respondents to volunteer as much information as they chose.

SESSION 9 – Final Report

The answers to the questionnaire were compiled, analyzed and summarized by COE Forensic Accountant/Investigator Karl Ross. His summary of the findings, together with charts and graphs are included in this report. Also included are selected excerpts from the interviews and staff recommendations.

Summary of Questionnaire Responses

During the second week of December 2013, COE staff conducted one-on-one interviews with 203 city regulatory employees and compiled the results of a related questionnaire. Fifty-four of the 203 employees or respondents (27%) were supervisory level employees. The number of respondents by department was as follows: Building (74), Parking (33), Code Compliance (29), Fire (28), Planning (19), Finance (9), Procurement (9), City Clerk's Office (1), other (1).

The first section of the three-part questionnaire consists of eight questions and asked employees to rate various aspects of the city and their working conditions on a scale of 1 to 10, with 1 being the lowest or least positive response and 10 being the highest or most positive.

With respect to Question No. 1 asking employees to rate their overall level of job satisfaction, it is clear most respondents liked their jobs as the average rating was 8 for all employees. Fire Department employees had the highest average rating at 8.6, while all other departments rated their level of job satisfaction at 7 or higher.

Similarly, most employees seemed satisfied with their working conditions with a 7.4 overall rating, as well as with the quality of supervision (7.7) and quality of training (7.0). The Parking and Finance departments were on the low end of the scale, as well as the Office of the City Clerk, though the sample size for the latter may not be representative.

Another positive note was that, based on the findings, respondents appeared to view the ethical conduct of their supervisors and co-workers favorably, scoring supervisory ethics at 8.1 and co-worker ethics at 8.2 overall. The respondents rated the city's overall ethics at 7.1.

It is interesting to note that co-worker morale was rated at just 6.1 overall, which contrasts with the markedly higher rating that employees gave when assessing their own level of job satisfaction. As noted above, the overall rating was nearly two points higher (8.0).

The second part of the questionnaire corresponds to questions nine through 16 and requires a yes or no response. Some of the respondents elaborated on their answers.

Question No. 9 asked employees whether they had ever been offered a bribe, and 27 percent of those respondents answered "yes." The Parking Department had the highest affirmative response as 45 percent of employees said they had been offered a bribe, followed by Code Compliance (34%), Finance (33%), Building (23%), Fire (18%), Planning (16%), Procurement (11%). A smaller percentage of respondents answered Question No. 10 affirmatively, as 13 percent of all employees said they had first-hand knowledge of bribery or corruption in their departments, led by the Building and Parking departments at 18 percent each.

The employees gave high marks in response to Question No. 11 about whether they had received sufficient training to avoid ethical pitfalls arising on their jobs, with 92 percent of respondents saying that they had, many of them citing their recent ethics training by COE.

In response to Questions No. 12 and No. 13, 60 percent of respondents said they believe there are sufficient safeguards against corruption while 64 percent said they believe there is an effective way for them to report corruption, though many stated they would like the city to adopt a whistleblower protection ordinance.

The support for such an ordinance was further evidence in the response to Question No. 16 in which 50 percent of respondents stated they did not feel there was adequate protection against retaliation for employees who wanted to report wrongdoing by their supervisors or fellow employees. Only one-third of respondents said they felt safe to report wrongdoing.

On the whole, 65 percent of respondents said they felt Miami Beach government was ethical, though some drew a distinction between rank-and-file employees and elected officials. Many employees voiced support for the city's new management and wanted to give newly elected leaders an opportunity to set the appropriate "tone at the top."

The third and final section of the questionnaire was qualitative in nature and asked employees to offer suggestions about ways to make the city's delivery of public services more ethical and efficient. It also asked respondents what could be done to encourage the reporting of serious misconduct and to express a preference as to how such investigations should be handled.

A sample of these findings was shared with senior management on January 16, 2014, along with the preliminary findings of the questionnaire. A number of trends emerged:

- Respondents expressed overwhelming support for a whistleblower program, saying they feared retaliation if they were to report wrongdoing.
- A large majority of respondents (77%) stated they would prefer an outside agency conduct investigations into alleged corruption.
- Respondents wanted a no-gift policy to apply to elected officials as well as staff and rank-and-file.
- Respondents wanted elected officials and senior management to receive ethics training.
- Respondents expressed little confidence in the city's Human Resources department to conduct confidential investigations into alleged misconduct.
- Many respondents felt the hiring process lacked transparency, and urged a more thorough background check of prospective employees.

- Many respondents called for closer supervision of employees with outside employment, especially licensed contractors working for the Building Department.
- Many employees expressed concerns about privatization, especially in parking enforcement where morale was well below average.
- Some employees expressed concerns about overly friendly relations between clerks and plan runners or expeditors.
- Some employees noted an atmosphere of favoritism, especially as it pertained to large businesses or individuals with connections to elected officials.
- Some respondents said ethics training should be mandatory for new hires and said they would like regular “refresher” courses.
- Many procurement employees stated they would like more ethics training relating to Code of Silence and lobbyist issues.
- Employees wanted supervisors to be more supportive in handling disputes arising from complaints by residents and visitors.
- Many parking officers complained about selective enforcement of the city’s parking rules, targeting some areas and relaxing enforcement in others.

One of the questions in section three was tabulated in a quantifiable manner – Question No. 21 regarding whether the Miami Beach police or an outside agency should be used to conduct investigations into public corruption. The analysis found more than three quarters of respondents preferred an outside agency (77%) while just one in 10 felt they should be handled by local police. Another 12% of respondents expressed they had no preference or declined to answer.

Conclusions

The results of the questionnaire make it clear that the city’s regulatory employees operate in a challenging environment, one that is fraught with temptation and pitfalls. This was most evident in the finding that more than one in four respondents stated they had been offered a bribe during their tenure in public service. It is likely the percentage is higher due to underreporting. Some respondents noted that Miami Beach is a multi-cultural milieu with residents and visitors from countries where public corruption is entrenched or at least widely tolerated.

The employees at greatest risk are those that deal with the public out in the field where contact is often unsupervised, as is the case with parking enforcement, code compliance and building and fire inspections. Those employees working at night are especially at risk. Plans reviewers, clerks and employees working in city offices indicated signs should be prominently displayed near their work stations to advertise the city’s no-gift policy and to discourage solicitations. Offices where employees interact with the public should also be designed to limit one-on-one contact and to promote greater transparency. Inspectors sent out on high-risk assignments such as inspecting

night clubs or work sites or businesses with pending violations should be accompanied by a supervisor or co-worker in order to reduce the risk of corrupt solicitations.

With respect to individual departments, senior management has been presented with qualitative feedback from the questionnaires. Perhaps one of the most pressing challenges is how to improve morale in the Parking Department where the risk of bribery is high and concerns about job security and selective enforcement are prevalent. Employees in the Planning Department also appeared to feel uneasy about a lack of support from departmental management and voiced concerns about political interference. Much of this seemed to stem from the lack of a permanent director. Other issues were raised in the Building Department about the use of private inspectors, both by the city and by private owners availing themselves of a provision in the Florida Building Code. Code compliance officers, meanwhile, said that closer supervision was needed.

Overwhelmingly, respondents said they felt stronger protections were required for employees who wanted to blow the whistle on suspected wrongdoing. Only one-third of those interviewed stated they felt safe to report misconduct and would be protected against retaliation. A high number of respondents stated they wanted an anonymous hotline or other reporting mechanism. A high percentage also stated they preferred investigations into alleged corruption be handled by an outside agency rather than by the Miami Beach Police Department.

Lastly, the questionnaire found a significant majority of respondents valued their jobs and enjoyed their work, as noted by the high level of overall satisfaction. It should also be seen as an encouraging sign that employees felt their supervisors and co-workers were highly ethical. Many employees said they would like more positive feedback from management and welcomed the opportunity to have their voices heard in the development of internal policies.

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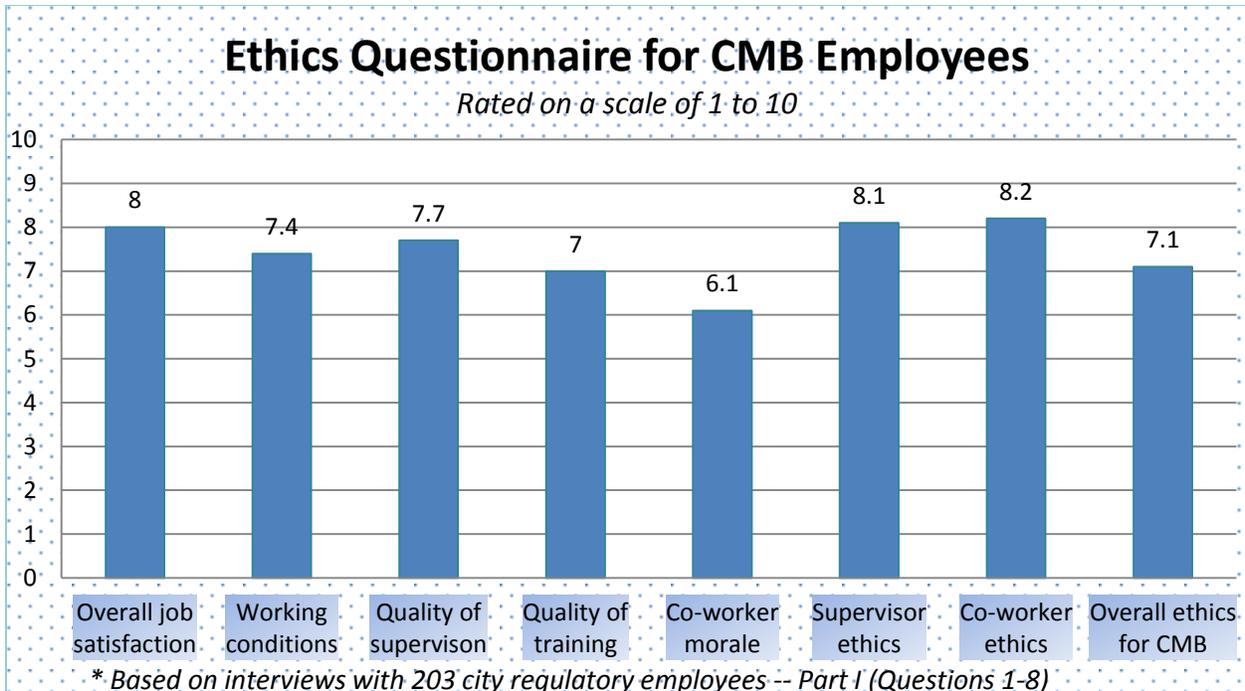


Chart 1

Response to Part I of Ethics Training Questionnaire for Miami Beach Regulatory Employees

Q: On a scale of 1 to 10, where 10 is strongest and 1 is least positive, please rate the following:

	Quest. #1	Quest. #2	Quest. #3	Quest. #4	Quest. #5	Quest. #6	Quest. #7	Quest. #8	
Miami Beach Department	Overall job satisfaction	Working conditions	Quality of supervision	Quality of training	Co-worker morale	Supervisor ethics	Co-worker ethics	Overall ethics for CMB	No.
Building	8	7.9	8	7	6.6	8.3	8.3	7.1	74
Clerk's Office	7	5	6	4	3	6	6	6	1
Code Compliance	7.9	7.1	7.8	6.9	6.1	8.3	8.2	7.5	29
Finance	7.4	6.6	6.6	5.8	6.9	7.9	8	7	9
Fire Rescue	8.6	8.2	8.5	7.9	6.6	8.9	8.9	6.9	28
Parking	7.9	6.4	6.9	7.1	4.8	6.3	7.2	6.9	33
Planning	7.5	6.8	7	6.4	4.9	8.5	8.7	7.3	19
Procurement	8	8.4	7.9	6.7	6.3	9.3	8.3	6.7	9
Other	3	1	10	5	1	1	8	5	1

Table 1

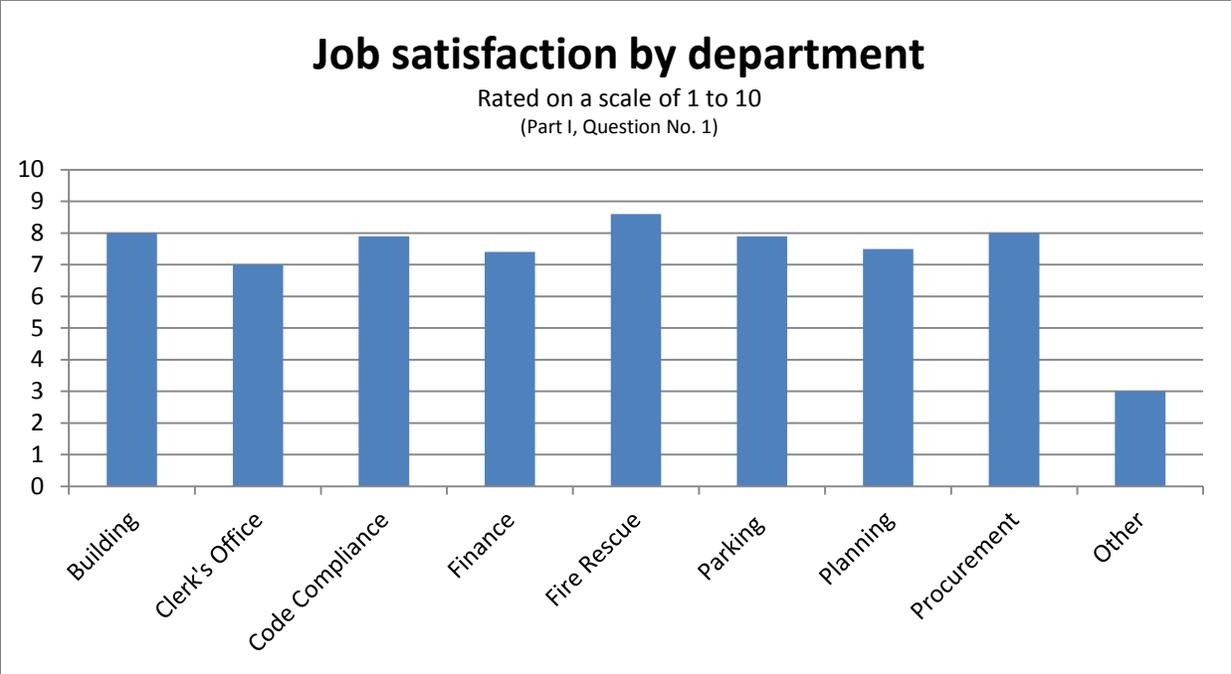


Chart 2

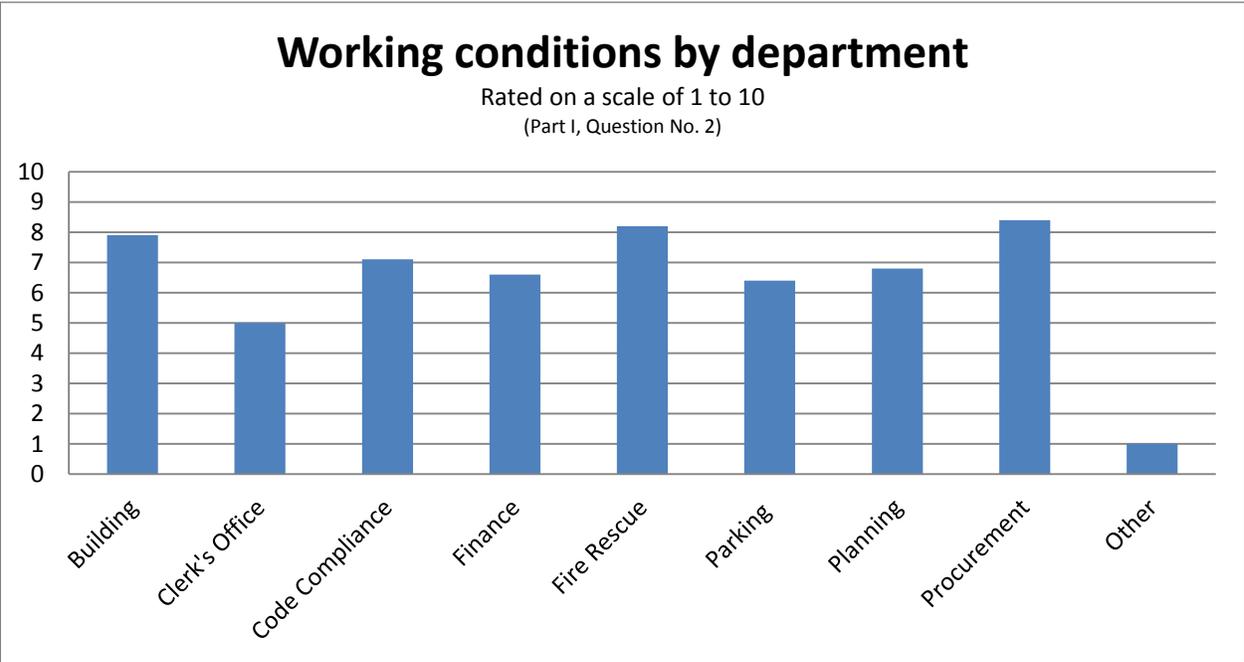


Chart 3

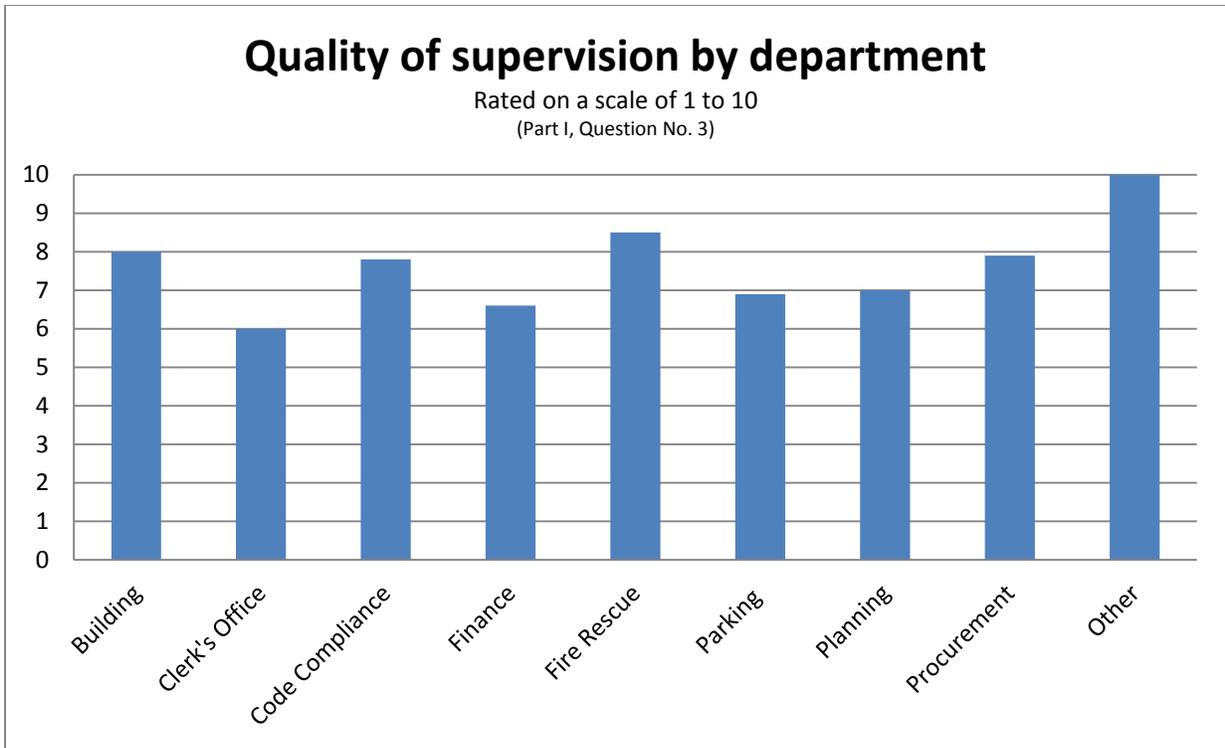


Chart 4

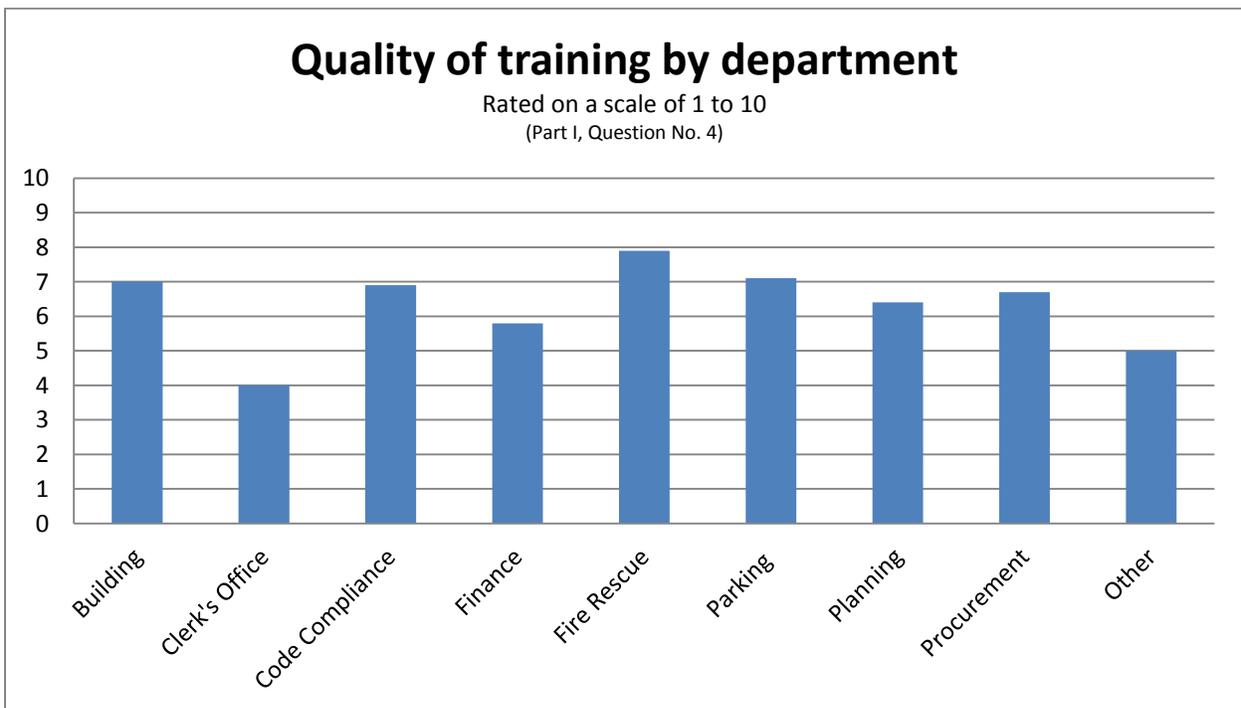


Chart 5

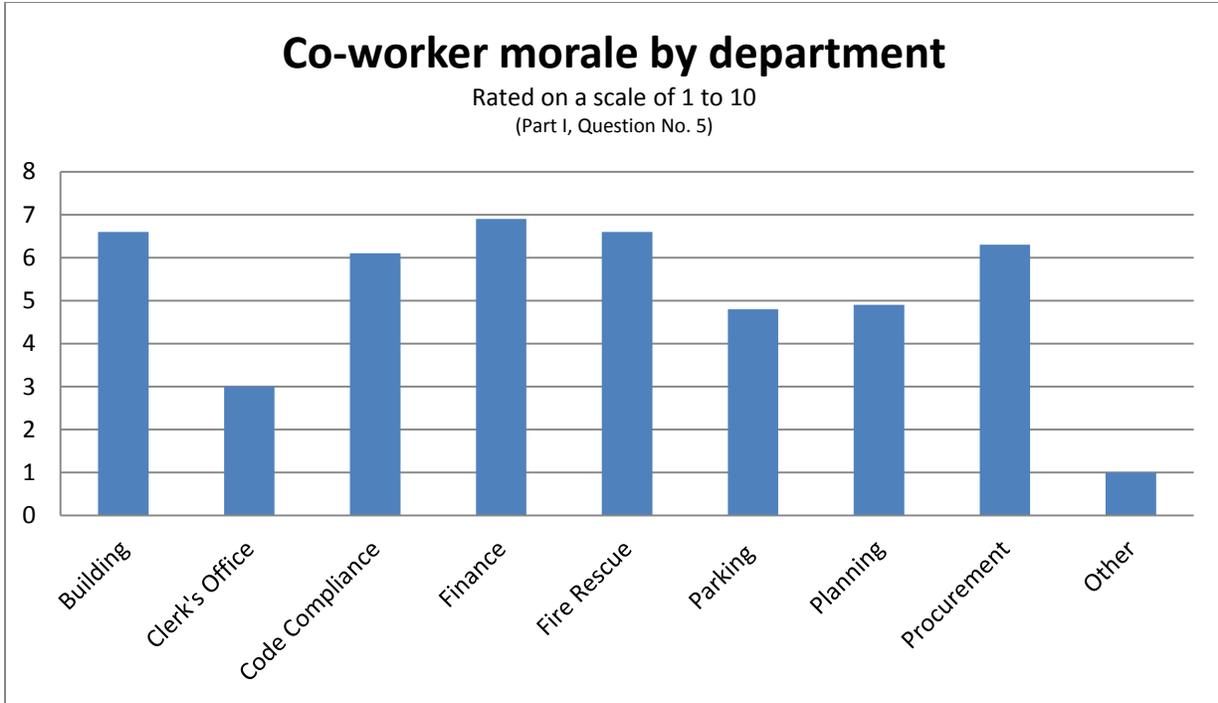


Chart 6

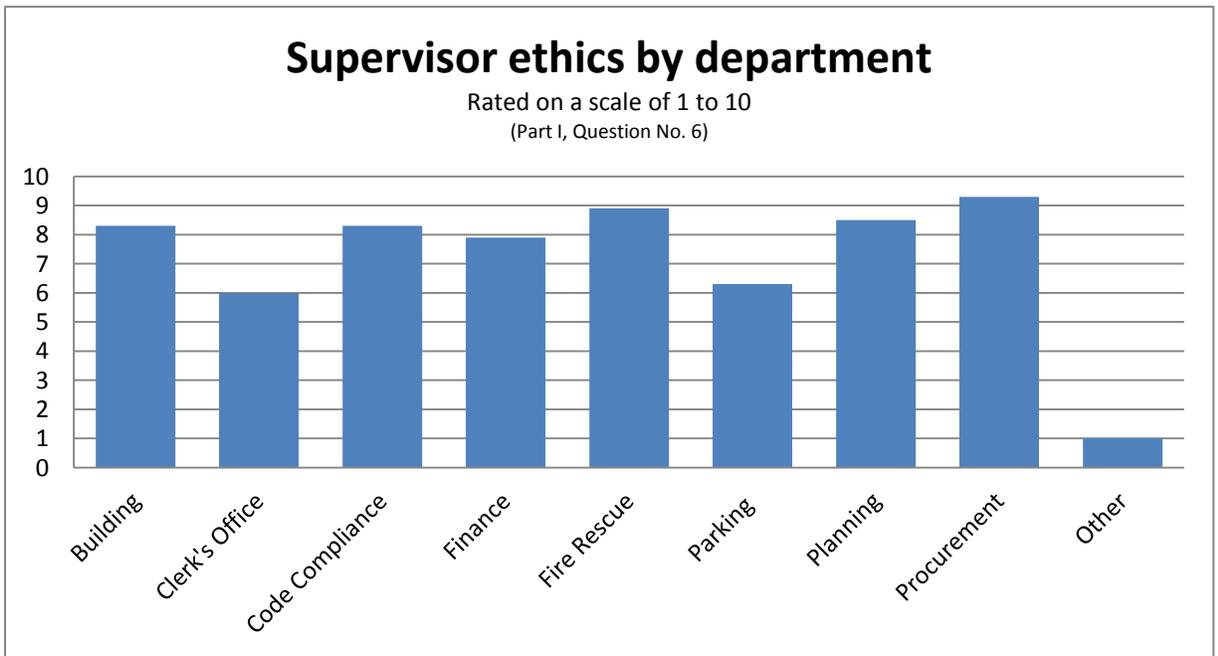


Chart 7

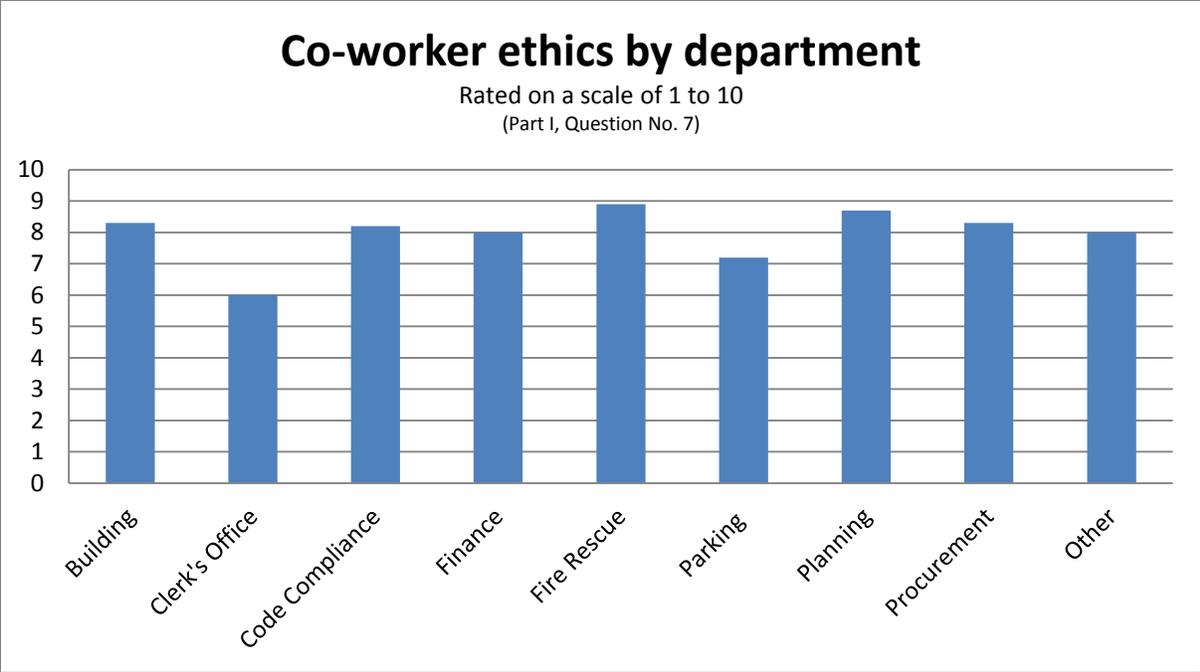


Chart 8

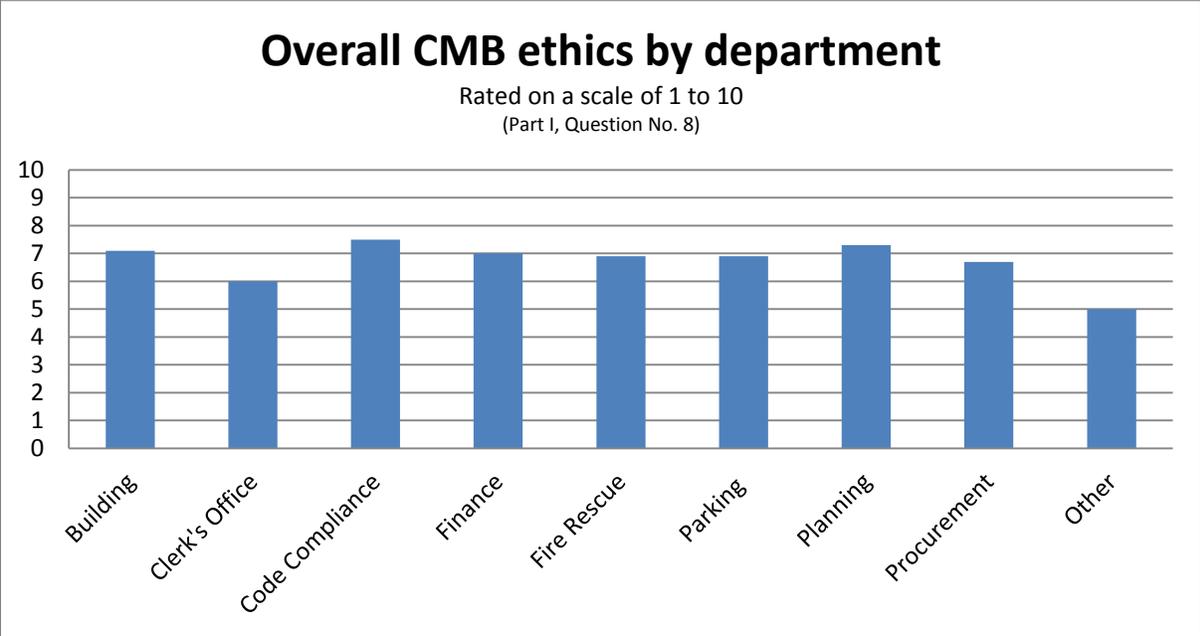


Chart 9

Response to Part II of Ethics Training Questionnaire for Miami Beach Regulatory Employees

Note: Based on a yes or no response to questions 9 through 16

Supervisor	Quest. #9	Quest. #10	Quest. #11	Quest. #12	Quest. #13	Quest. #14	Quest. #15	Quest. #16
	Have you ever been offered a bribe?	Are you aware of bribery or corruption?	Have you received adequate training?	Are there sufficient safeguards against corruption?	Is there an effective way to report corruption?	Do you believe city government is ethical?	With more training, could you have avoided mistakes?	Is there adequate protection against retaliation?
Yes	54	27	187	122	130	131	37	68
No	148	175	12	64	57	41	150	102
Unk	1	1	4	17	16	31	16	33
T=	203	203	203	203	203	203	203	203
Yes =	27%	13%	92%	60%	64%	65%	18%	33%
No =	73%	86%	6%	32%	28%	20%	74%	50%
Unk =	0%	0%	2%	8%	8%	15%	8%	16%

Table 2

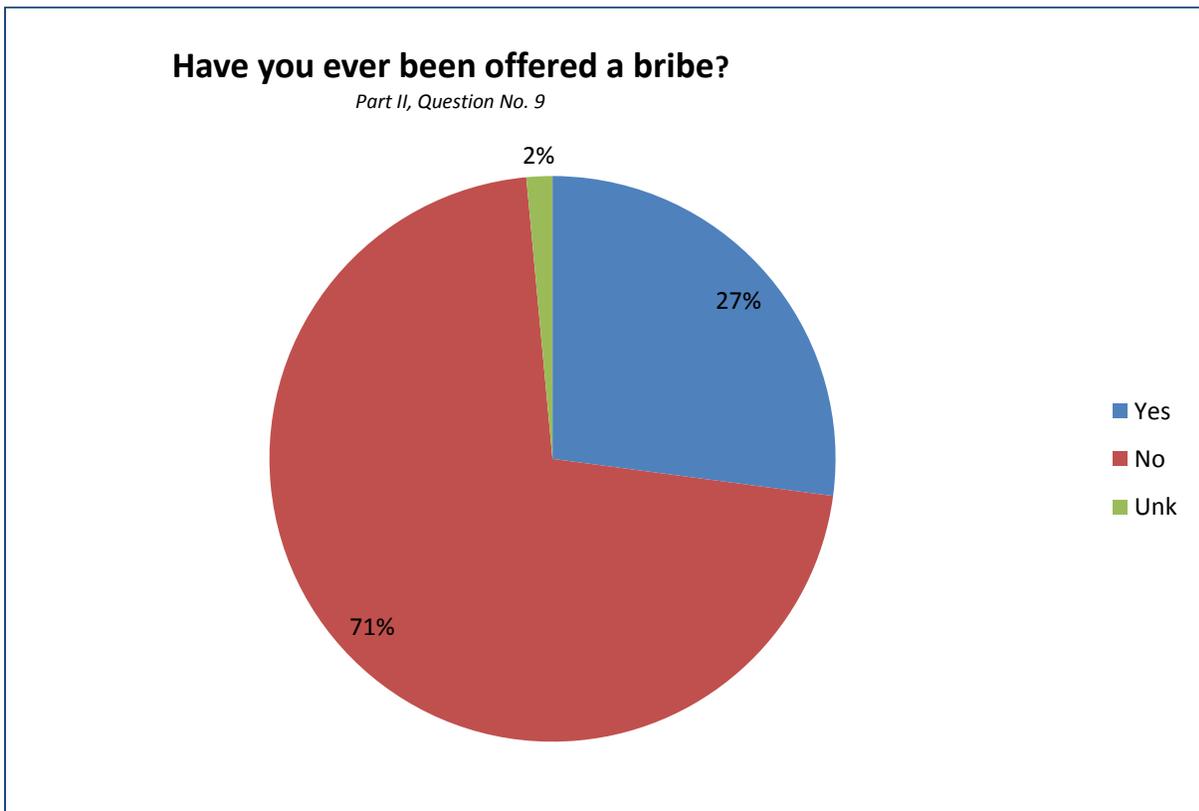


Chart 10

Are you aware of bribery or corruption?

Part II, Question No. 10

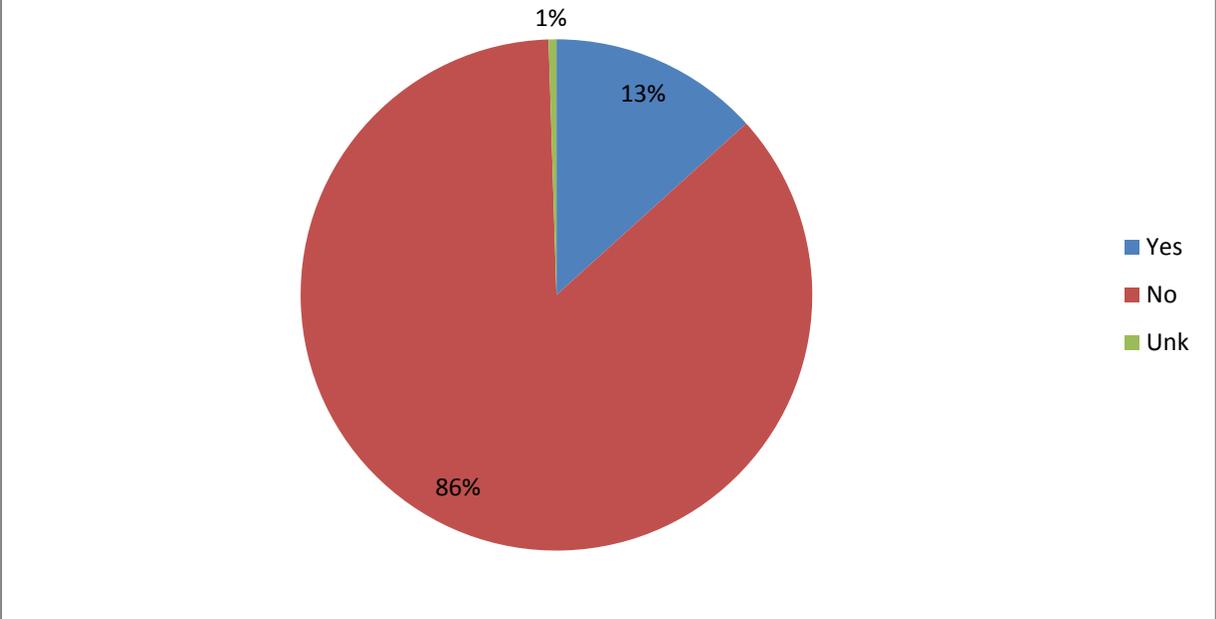


Chart 11

Have you received adequate training?

Part II, Question No. 11

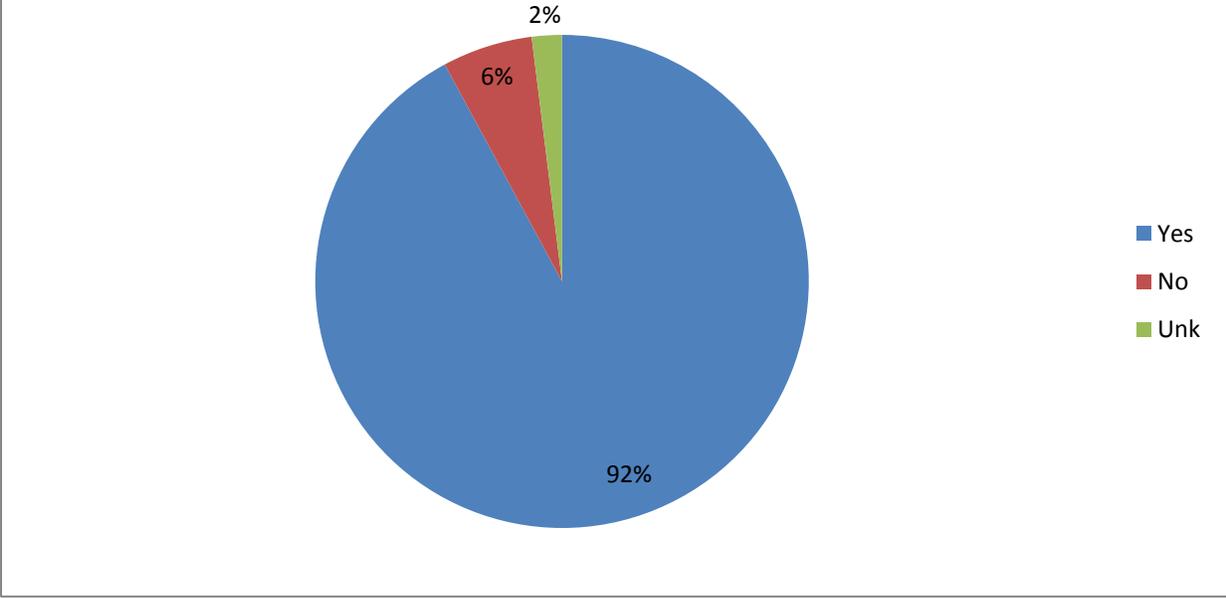


Chart 12

Are there sufficient safeguards?

Part II, Question No. 12

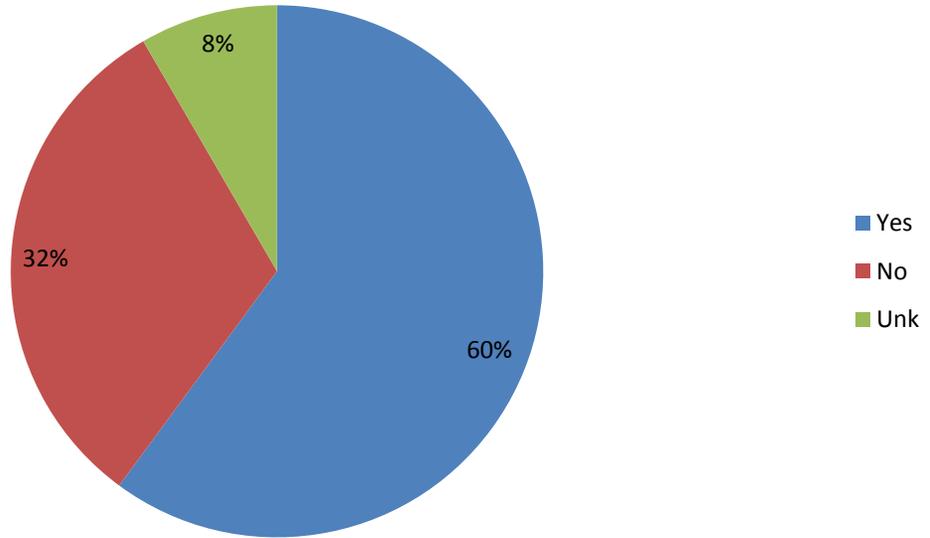


Chart 13

Is there a way to report corruption?

Part II, Question No. 13

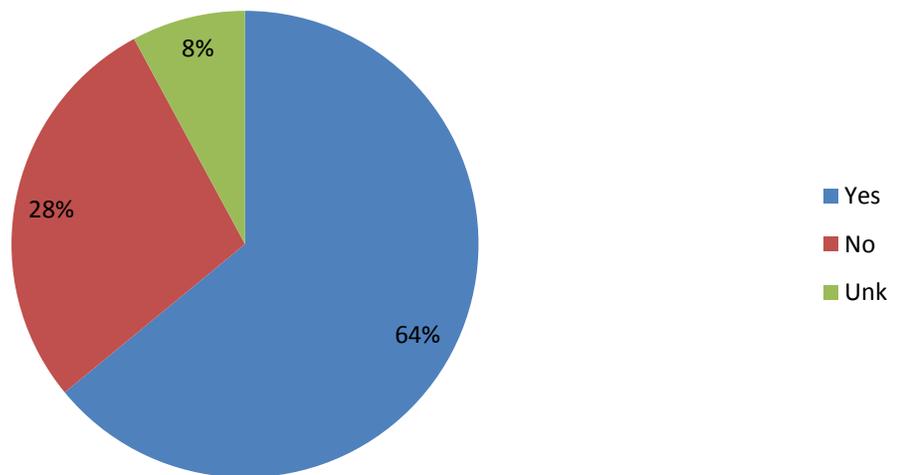


Chart 14

Is City of Miami Beach government ethical?

Part II, Question No. 14

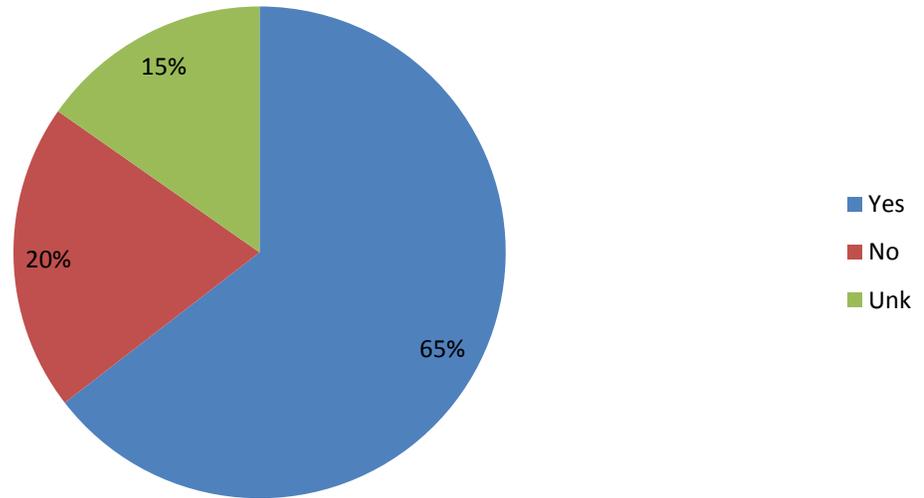


Chart 15

With more training, could ethics mistakes have been avoided?

Part II, Question No. 15

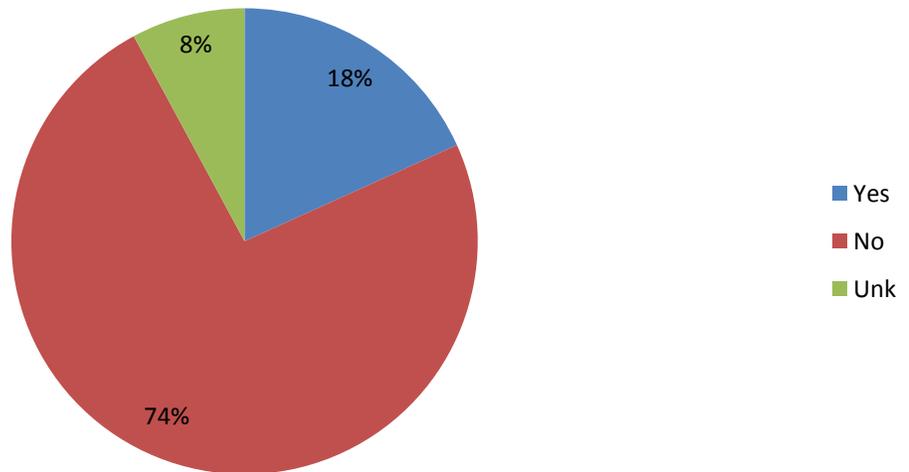


Chart 16

Is there adequate protection against retaliation?

Part II, Question No. 16

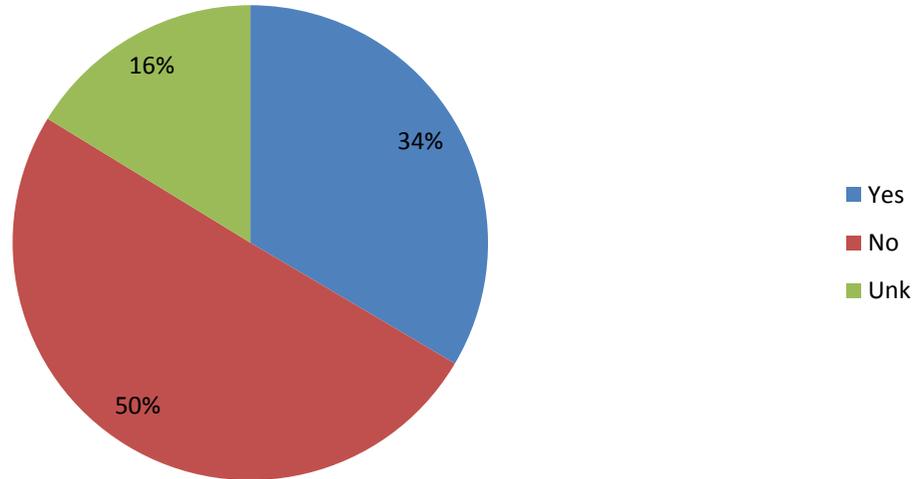


Chart 17

Affirmative responses to Part II, Questions No. 9 through No. 16, expressed as a percentage

* Clerk's Office omitted due to small sample size

	Quest. #9	Quest. #10	Quest. #11	Quest. #12	Quest. #13	Quest. #14	Quest. #15	Quest. #16
	Have you ever been offered a bribe?	Are you aware of bribery or corruption?	Have you received adequate training?	Are there sufficient safeguards against corruption?	Is there an effective way to report corruption?	Do you believe city government is ethical?	With more training, could have avoided mistakes?	Is there adequate protection against retaliation?
City Department								
Building	23%	18%	91%	61%	72%	64%	14%	43%
Code Compliance	34%	10%	93%	66%	62%	76%	17%	38%
Finance	33%	11%	100%	89%	78%	56%	11%	33%
Fire Rescue	18%	4%	96%	68%	61%	61%	29%	29%
Parking	45%	18%	85%	45%	55%	52%	21%	33%
Planning	16%	11%	95%	63%	58%	79%	16%	16%
Procurement	11%	0%	100%	44%	56%	78%	33%	0%

Table 3

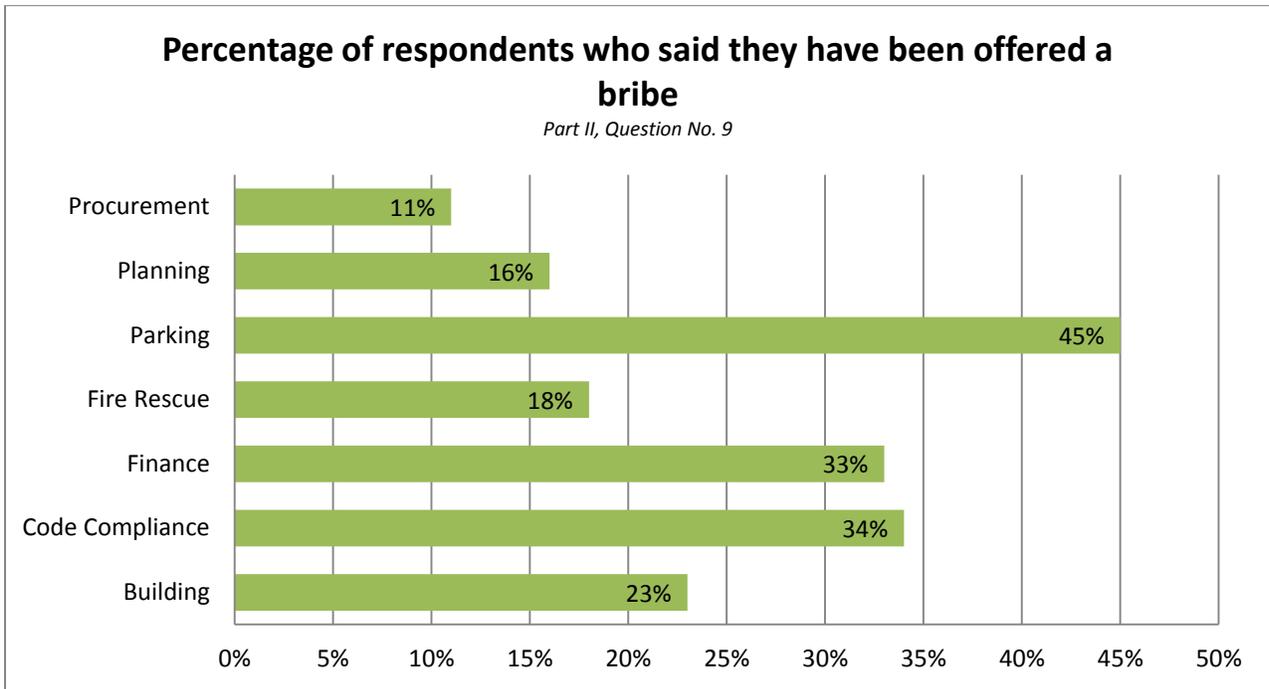


Chart 18

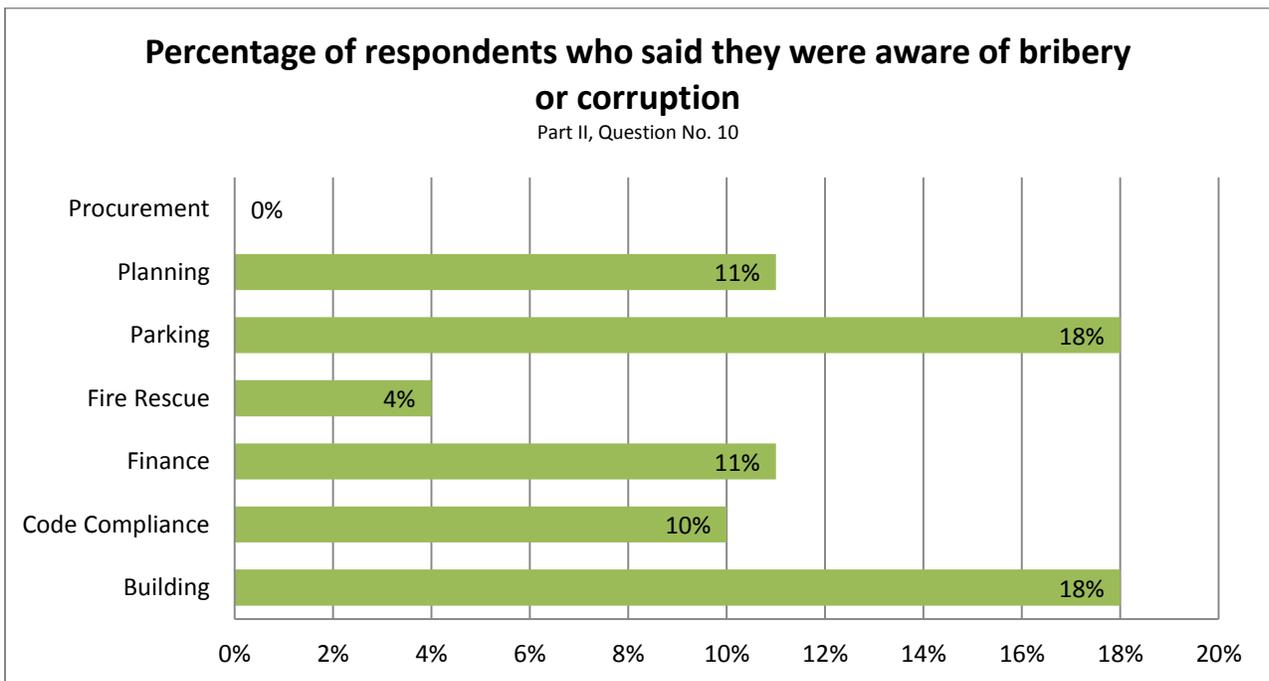


Chart 19

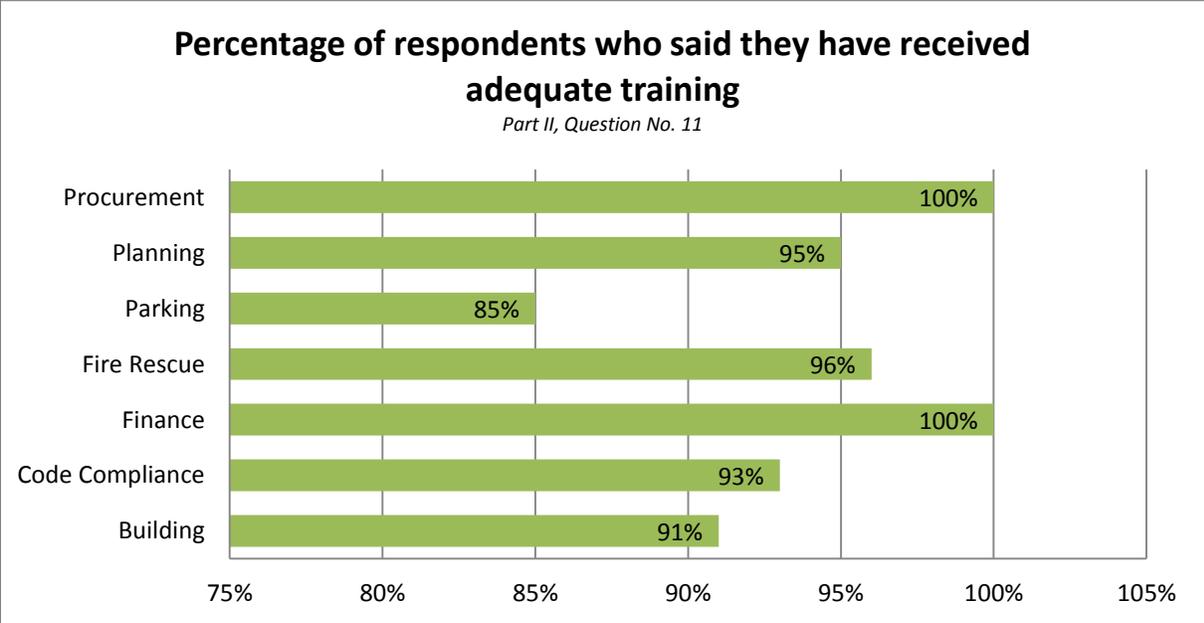


Chart 20

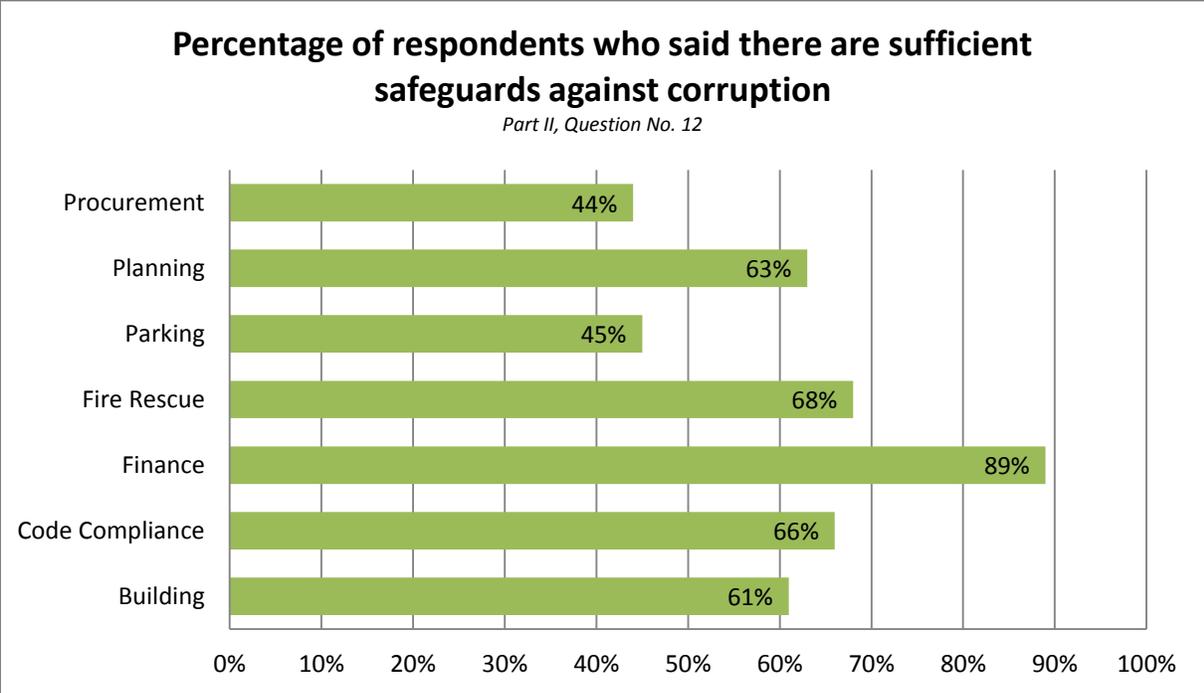


Chart 21

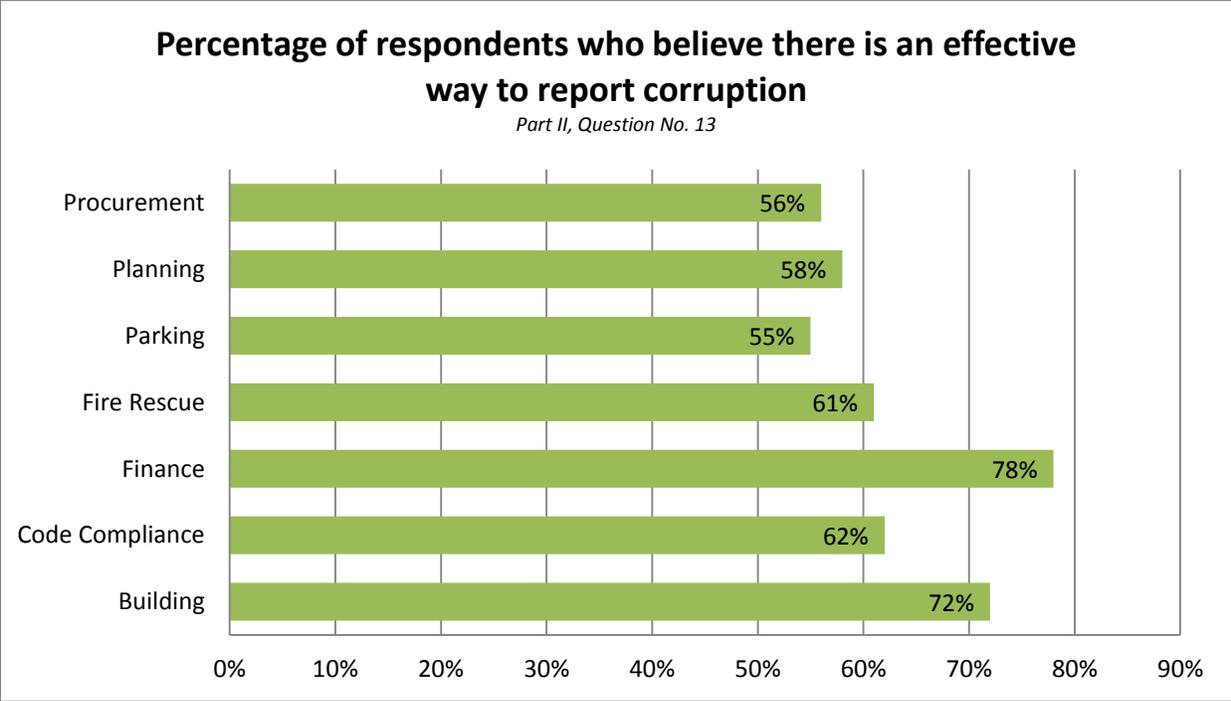


Chart 22

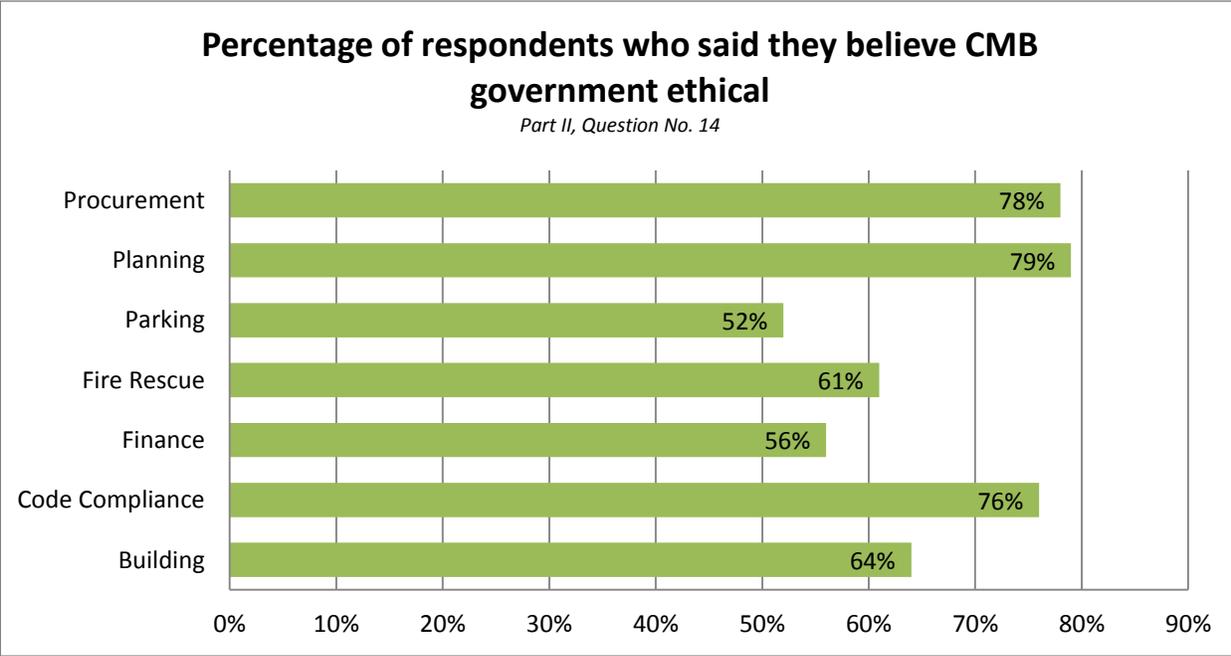


Chart 23

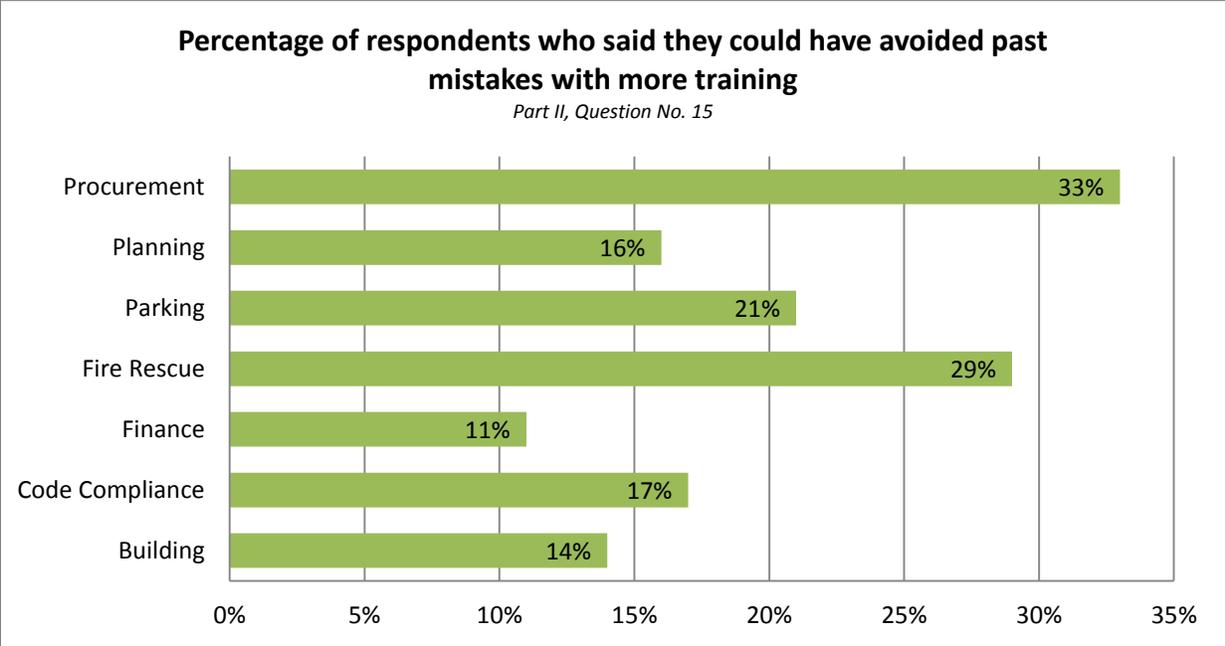


Chart 24

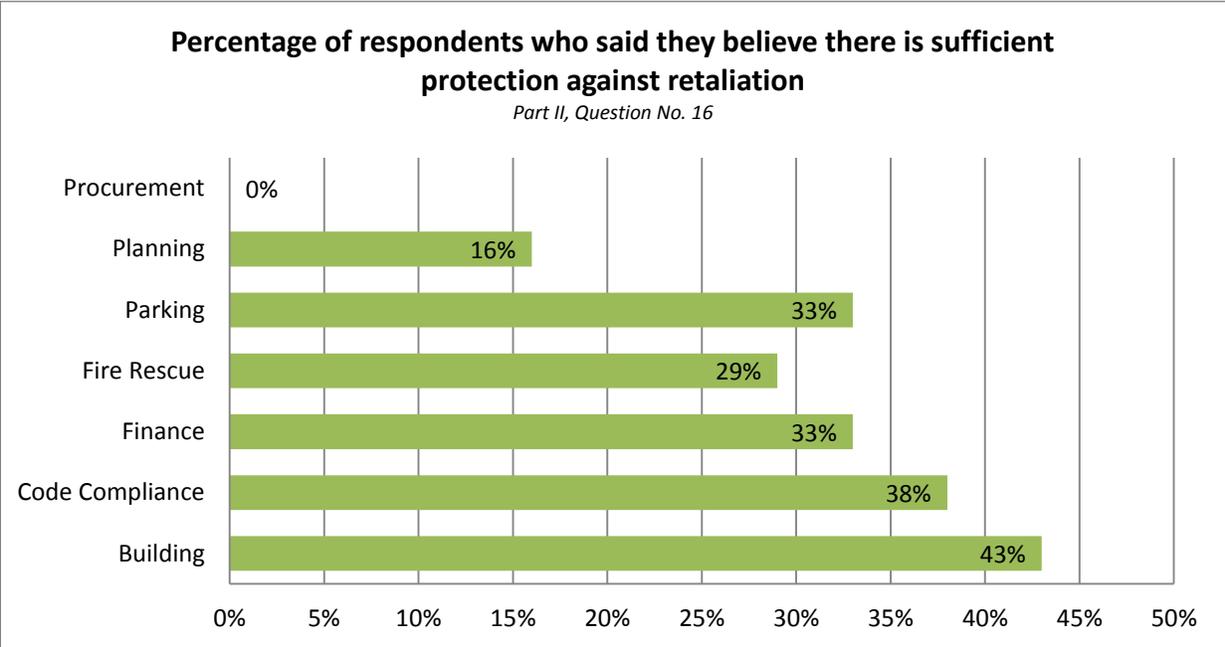


Chart 25

MIAMI BEACH REGULATORY EMPLOYEE ETHICS TRAINING

QUESTIONNAIRE

DEPARTMENT _____

SUPERVISOR ____ **NON-SUPERVISOR** ____

I. On a scale of 1 to 10, where 10 is the strongest positive response and 1 is the least positive, please rate the following:

1. Your overall job satisfaction _____
2. Your satisfaction with your working conditions _____
3. The quality of the on-the-job supervision you receive _____
4. The quality of the job training you have received _____
5. The morale of your fellow employees _____
6. The ethical standards of your supervisors _____
7. The ethical standards of your fellow employees _____
8. The overall ethical standards of the City government _____

II. The following questions may be answered with a yes or no response. However, please feel free to add any additional comments you may have that would explain or qualify your answer.

9. Have you ever been offered a bribe? _____

10. Other than hearing or reading about cases through the media or from fellow employees, have you ever become aware of any bribery or other corruption in your department? _____

11. Do you feel that you have received adequate training and preparation to enable you to avoid any ethical pitfalls that may arise on your job? _____

12. Do you believe that there are sufficient safeguards presently in place to effectively prevent corruption where you work? _____

13. Is there currently an effective way for City employees to report suspected corruption? _____

14. Do you consider the government of the City of Miami Beach to be ethical? _____

15. Do you feel that if you had received more ethics training earlier in your career in Miami Beach City government, you could have avoided some ethics mistakes that you might have made in the past? _____

16. Do you feel that there is adequate protection against retaliation for City employees to feel safe to report wrongdoing by their supervisors or fellow employees? _____

III. The following questions are open-ended and require a verbal response that should involve more than a single word or phrase. Please feel free to elaborate or explain as much as you wish in your answer.

17. Please describe any circumstances surrounding your current employment, e.g., working conditions, workload, colleagues, supervision, etc., that you believe raise ethical concerns.

18. If you had the power to make any changes in City policies that you believed were needed to provide a more **efficient** public service, what would they be?

19. What, if any changes, would you make to ensure a more **ethical** public service in Miami Beach?

20. How can the City give more protection and encouragement to employees who want to blow the whistle on serious misconduct?

21. Would you prefer that corruption investigations involving City employees be handled by Miami Beach Police or by an outside agency? ____ Why or why not?

22. Which part of the ethics training program that you recently completed made the biggest impression on you? Why?

23. Is there anything that we have not already discussed that you would like to tell us?
