



Deborah Southerington, Chairwoman  
F. Allen Boseman, Commissioner  
Thomas L. Colaluca, Commissioner

May 1, 2018

President Dan Brady  
Chairperson Shontel Brown,  
Human Resources, Appointments & Equity Committee  
Cuyahoga County Council  
2079 East Ninth Street - 8th Floor  
Cleveland, Ohio 44115

Dear President Brady and Chairperson Brown,

On behalf of the Personnel Review Commissioners, please find attached the PRC's 2017 Report on Ethics Compliance. The Cuyahoga County Charter Section 9.02 (3) provides the PRC with authority to ensure compliance with ethics resolutions or ordinances as passed by County Council. The Cuyahoga County Code requires the PRC to work in cooperation with the Agency of the Inspector General and Department of Human Resources to ensure county-wide compliance with this provision of the Code. Specifically, Section 407.03 of the County Code assigns the Human Resources Department with responsibilities related to training, distribution and posting of whistleblower policies.

The PRC worked with the Inspector General's office and the Human Resources department to prepare this report. The Report includes both findings and recommendations, along with HR's responses to compliance issues we identified. The PRC found that HR does not maintain records of ethics training completion for all persons covered by the requirement, and that the County's Ethics Policy Manual is not distributed according to the requirement in the Code. Recommendations are included on both these issues and Human Resources has assured the PRC it is committed to resolving these matters going forward.

The PRC will gladly answer any questions you have regarding the contents of this report.

Respectfully,

Rebecca Kopcienski, Director

Attachment

cc: PRC Chairwoman Debbie Southerington  
PRC Commissioner F. Allen Boseman  
PRC Commissioner Thomas Colaluca  
HR, A & E Vice-Chairman Mike Gallagher  
HR, A & E Member Yvonne Conwell

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HR, A & E Member Pernel Jones  
HR, A & E Member Dale Miller  
Councilwoman Nan Baker  
Councilman Michael Houser  
Councilman Jack Schron  
Councilwoman Sunny Simon  
Councilman Scott Tuma  
Council Chief of Staff Joseph Nanni  
Council Clerk Jean Schmotzer  
Inspector General Mark Griffin  
Director of Human Resources Douglas Dykes



# **2017 REPORT ON ETHICS COMPLIANCE**

**Cuyahoga County  
Personnel Review Commission**

## **Background**

Chapter 407 of the Cuyahoga County Code sets forth the various duties of the County's Inspector General (IG), Department of Human Resources (HR), and Personnel Review Commission (PRC) relative to the County's Ethics Policy.

Section 407.02 of the Code requires the PRC to provide an annual report to County Council regarding ethics training, distribution of ethics laws, and posting of whistleblower policies in County worksites.

**Training** – All elected officials, employees, and board members are required to complete ethics training within 30 days of assuming office. Thereafter, elected officials and employees are required to complete training on an annual basis.

**Distribution** – A copy of ethics laws and the County Ethics Policy Manual shall be distributed to all elected officials, employees, and board members who shall acknowledge receipt.

**Posting** – Whistleblower policies shall be posted with other employment law postings at County worksites.

## **Objective and Methodology**

This Report is intended to provide County Council with a summary of the Human Resources Department's compliance with the requirements of the County's Ethics Policy, specifically Section 407.03.

Per Section 407.02 of the Code, the PRC and HR collaborated to compile the information necessary to provide Council with the following Compliance Report. The data is accurate as of March 2, 2018.

## **Summary of Findings**

The PRC has determined that HR has incorrectly limited its responsibilities under the Ethics Policy. Ethics training has not been provided to board members and HR has not obtained ethics training certifications from the Prosecutor's Office or board members. In addition, HR has not completely fulfilled its distribution responsibilities as required by the Code.

**Quick Reference – Immediate Action Items**

<b>County Code Section</b>	<b>Issue</b>	<b>Recommendation</b>
§ 407.03(A)	HR does not maintain records of ethics training completion for all covered individuals	(1) Determine which board members are included in the definition and arrange ethics training for them; (2) Obtain ethics training completion verification for the Prosecutor, his employees, and all board members.
§ 407.03(C)	HR does not distribute the County Ethics Policy Manual to covered individuals on or before their first ethics training	(1) Seek legislative revisions to align Code Sections 407.03(C) and 401.07(M); (2) Include reference to Manual and where employees can obtain a copy (IG’s website) in ethics training.

# COMPLIANCE REPORT

## TRAINING

### 1. New Employees

Per Section 403.01(A) of the County Code, new employees of the County must attend ethics training within 30 days of hire. The Department of Human Resources is responsible for conducting this training under County Code Section 407.03(A). Ethics training is included in the County's New Employee Orientation.

Four hundred sixty-three (463) new hires attended orientation/ethics training in 2017. A review of the data provided by HR reveals that all but one employee attended ethics training within 30 days of hire.

#### **Compliance Concern**

Per the spreadsheet provided to the PRC, one employee hired as a Corrections Officer in the Sheriff's Department on May 30, 2017 attended orientation/ethics training on September 8, 2017; more than 30 days after his date of hire.

#### **HR Response**

This employee was initially hired on May 30, 2017 but determined that he could not continue with the class of corrections officers, he separated from employment on May 31, 2017. He was rehired on September 5, 2017 and completed orientation on September 8, 2017.

#### **Recommendation**

The date of hire indicated on the spreadsheet should be change to September 5, 2017.

#### **Anomalies**

- Eight employees did not have start dates included on the spreadsheet provided to the PRC. As such, the PRC was unable to determine if the employees attended ethics training within 30 days of hire.

#### **HR Response**

Five of the individuals were hired in the Sheriff's Department. Those individuals attended ethics training as part of orientation, but ultimately did not start employment with the County.

The three remaining individuals were hired for summer fellowships with various County departments and were not processed through SAP; as such, the date of hire for these individuals is not included on the spreadsheet.

### **Recommendation**

Dates of employment for summer fellowships should be tracked in the HRIS. If there are limitations in SAP that prevents such tracking, HR should determine a different way to maintain a record of dates of employment for these individuals.

- Several employees attended ethics training prior to their date of hire. All but one of these individuals are Sheriff's Department Employees.

### **HR Response**

These Sheriff's Department employees attended ethics training as part of their mandatory OPATA training for Corrections Officers which takes place prior to their start date.

The other employee was employed by the Prosecutor's Office prior to being hired to work in the County's IT Department. He attended ethics training as part of new employee orientation while wrapping up his work for the Prosecutor's Office and prior to beginning work for the IT Department.

- One employee identified as an Intern who was later hired in the Sheriff's Department attended ethics training twice in 2017. Another employee identified as a Fellow in the Medical Examiner's Office was also later hired into a permanent position by the County but only attended ethics training once. The PRC requested clarification regarding the different approaches to similar circumstances.

### **HR Response**

The individual from the Sheriff's Department attend ethics training when she began employment as an Intern and then again as part of the mandatory OPATA training for Corrections Officers; she was not required to attend twice.

## **2. Existing Employees**

Per Section 403.01(A) of the County Code, existing County employees must attend ethics training annually. In 2017, 4,614 employees completed ethics training.

## **Compliance Concern**

As of March 2, 2018 there are approximately 135 employees that have yet to complete their required annual ethics training.

### **HR Response**

Of the 135 employees yet to complete annual ethics training, thirty-one (31) of the employees are on approved leave and nineteen (19) of them attempted but did not view the required video. The remaining employees failed to view the training video.

HR provided the report of the employees who failed to view the ethics training to the Agency of the Inspector General which is following up with these employees and/or their Departments to ensure compliance for 2017. See Appendix A [List of employees yet to complete]

## **3. Record Keeping**

Per Section 407.03(A) of the County Code, HR “shall receive and maintain records of ethics certifications from all such elected officials, employees, and board members.”

These terms are defined in the Code as follows:

“**Elected Official**” shall include any person holding elective office specified in, or established pursuant to, the Charter. Such Elected Officials shall include, without limitation, the County Executive, the Prosecuting Attorney, and members of County Council.

“**Employee**” shall mean any employee of Cuyahoga County including, but not limited to, any person employed, full or part time in a temporary or permanent capacity, by the County Executive, the Prosecuting Attorney, the County Council, the Personnel Review Commission, the Board of Revision, the Inspector General, and any other county agency hereafter established by or pursuant to the charter.

“**Board Member**” shall include members of any board, agency, commission, or authority as is or may hereafter be established by or pursuant to the Charter or County Code who are appointed or confirmed by elected officials or county officers or directors.

## **Compliance Concern**

The PRC receives a spreadsheet from HR which reflects ethics training attendance for the following: the County Executive and his employees (includes all Executive agencies), Council and its staff, the PRC and its staff, the Internal Auditor and his staff, and the Inspector General and his staff. It does not track the Prosecutor, Prosecutor employees, or any boards/commissions other than the PRC, although the Code clearly includes these entities.



Based on the definition in the Code, “board members” would likely include members of the Audit Committee, Charter Review Commission, Debarment Review Board, and Economic Development Commission to the extent these boards/commissions are active and have members that are not current county employees/elected officials [who would already be required to attend ethics training in that capacity].

HR is required by the Code to receive and maintain records of ethics certifications for all elected officials, employees, and board members. Accordingly, HR is not in compliance with Section 407.03(A) of the County Code.

### **Recommendation**

HR should determine which board members are covered by the Ethics Policy, provide ethics training to those board members, and maintain the records of training certifications. In addition, HR should request ethics certifications from the Prosecutor’s Office and the covered board members.

HR should consider including these entities in the spreadsheet that is used to track all other covered entities for ease of reference.

### **HR Response**

HR will work with the Agency of the Inspector General and the Law Department to fully understand the requirements of the Code. After, HR will engage board members and administer appropriate training.

## **4. HR Responsibilities**

Per Section 407.03(A) of the County Code, HR “shall administer ethics training as necessary, and distribute a copy of the County’s ethics policy to all elected officials, employees, and board members who are required to receive ethics training under this Title.”

### **Compliance Concern**

To date, HR has limited its ethics training to the County Executive and his employees (includes all Executive agencies), Council and its staff, the PRC and its staff, the Internal Auditor and his staff, and the Inspector General and his staff. HR does not provide training to the Prosecutor, his employees, or all board members (as defined by the Code).

The Prosecutor’s Office has, however, been provided an ethics training video for use in training its employees; thereby, satisfying HR’s responsibility with respect to the Prosecutor’s Office.

## **Recommendation**

As the department charged with administering ethics training, HR should be providing training to all board members that it determines are covered by the Code.

HR should continue to provide the Prosecutor's Office with updated ethics training videos.

## **HR Response**

HR will work with the Agency of the Inspector General and the Law Department to fully understand the requirements of the Code. After, HR will engage board members and administer appropriate training.

## **DISTRIBUTION**

Per Section 407.03(A,C,E) of the County Code, HR is responsible for distributing the ethics laws and the County Ethics Policy Manual to elected officials, employees, and board members.

## **Compliance Concerns**

### **Ethics Laws**

During ethics training, HR notifies participants of the electronic link for the County's full Ethics Policy (Title 4 of the County Code) on the County's website and participants are required to sign an Acknowledgment form as confirmation of receipt of this information.

Similar to the issue discussed above, HR has affirmed their distribution of the ethics laws but with a limitation of the covered individuals to "employees, elected officials, and board members **within the Executive Agencies, including County Council**". See Appendix B [Ethics Distribution Responsibilities statement]. HR has incorrectly limited its responsibilities under the Code.

## **Recommendation**

The County Code requires HR to distribute the ethics laws and the County Ethics Policy Manual to elected officials, employees, and board members, as those terms are defined in the Code. Once HR determines which board members are covered, it should include the board members and the Prosecutor and his employees in its distribution responsibilities.

## **HR Response**

HR accepts this recommendation regarding distribution of the ethics policy and will facilitate accordingly.

### Ethics Policy Manual

Section 407.03(C) requires HR to distribute “the County Ethics Policy Manual prepared by the Department of Law”. Because this requirement is listed separately from the distribution of the ethics laws, it is apparently a different document that has not been provided to employees, elected officials, and board members. The PRC has contacted the Law Department to request a copy of the County Ethics Policy Manual. HR has confirmed that it does not have the Manual and that no such document is provided to employees during ethics training. HR is not in compliance with Section 407.03(C).

## **Recommendation**

HR should obtain the County Ethics Policy Manual from the Law Department and distribute it to covered individuals.

## **HR Response**

Individuals from the Law Department, HR, and Council staff have determined that when Title 4 of the County Code was amended in 2016, Council intended that the Manual referenced in Section 407.03(C) be the same as the Manual identified in Section 407.01(M); however, the revisions to Section 407.03(C) were overlooked in the amendment process.

The County Ethics Policy Manual is posted on the Inspector General’s website.

## **PRC Response**

HR does not “furnish” covered individuals with copies of the Manual on or before their first ethics training as required by the Code. HR should include a reference to the Ethics Policy Manual during ethics training and provide participants with the electronic link for the Manual.

In addition, a revision to Section 407.03(C) is necessary to clarify this issue.

## **POSTING**

Per Section 407.03(D,E) of the County Code, HR is responsible for posting the County’s Whistleblower policy at all County worksites.

## **Compliance**

HR has declared The Whistleblower policy is posted at all County worksites. See Appendix C [Posting locations and responsible employee].

The PRC randomly selected five County worksites and verified that the Whistleblower policy is posted as required by the Code.

## **Poster Update Needed**

The Whistleblower Policy poster should be revised to reflect this agency's name change from the Human Resources Commission to the Personnel Review Commission pursuant to a 2013 Charter amendment. This change is necessary because employees may be confused by the inaccurate posters. Once this change is made, the posters should be redistributed and posted at all County worksites.

See Appendix D [Whistleblower Policy with necessary revision noted].

## **HR Response**

HR will update the Whistleblower Poster.

# APPENDIX

- A- List of employees yet to complete/acknowledge ethics training
- B- Ethics Distribution Responsibilities statement
- C- Posting locations and responsible employee
- D- Whistleblower Policy with necessary revision noted

Name	Supervisor OR EE Email address	Department	Complete	Notes
John O'brien	jfbrien@cuyahogacounty.us	COM	No	on leave
Diane Porter	HAMPTA@odjfs.state.oh.us	CSEA	No	On Leave
Paula Farrell	paula.farrell@jfs.ohio.gov	CSEA	No	On Leave
Erica Clinkscale	erica.clinkscale@jfs.ohio.gov	DCFS	No	On Leave
Gwendolyn Drayton	Gwendolyn.Drayton@jfs.ohio.gov	DCFS	No	On Leave
Kenneta Boyd Bey	Jennifer.Rogers@jfs.ohio.gov	DCFS	No	On Leave
Lanlah Robey	Lanlah.Robey@jfs.ohio.gov	DCFS	No	On Leave
Melanie Green	htraining@cuyahogacounty.us	DCFS	No	On Leave
Tracy Durkin	tracy.durkin@jfs.ohio.gov	DCFS	No	On Leave
Shirley Jackson	shirley.jackson@jfs.ohio.gov	DSAS	No	On Leave
Angela Labossiere	angela.newcomb@jfs.ohio.gov	EFFS	No	On Leave
Deidre Mckinney	DEIDRE.MCKINNEY@jfs.ohio.gov	EFFS	No	On Leave
Elizabeth Castaneda	floree@odjfs.state.oh.us	EFFS	No	On Leave
Vicki Lightner	htraining@cuyahogacounty.us	EFFS	No	On Leave
Ashley Mosby-Miles	amosbymiles@cuyahogacounty.us	OHR	No	on leave
Cheyla Robinson	tkilbane@cuyahogacounty.us	PW	No	On Leave
Daniel Myers	mholt@cuyahogacounty.us	PW	No	On Leave
Michael Joyce	htraining@cuyahogacounty.us	PW	No	On Leave
Michael Parks	sbritt@cuyahogacounty.us	PW	No	On Leave
Aaron Hunter	dmatejka@cuyahogacounty.us	SHRF	No	On Leave
Abner Santiago	dmatejka@cuyahogacounty.us	SHRF	No	
Adam Maclin	dmatejka@cuyahogacounty.us	SHRF	No	
Alberta Mitchum	dmatejka@cuyahogacounty.us	SHRF	No	
Andre Patrick	htraining@cuyahogacounty.us	SHRF	No	attempted - did not view video
Anisha Franklin	bkwilliams@cuyahogacounty.us	SHRF	No	attempted - did not view video
Annette Cardwell	dmatejka@cuyahogacounty.us	SHRF	No	
Barbara Bailey	htraining@cuyahogacounty.us	SHRF	No	
Barrington Brown	dmatejka@cuyahogacounty.us	SHRF	No	
Bradford Keene	dmatejka@cuyahogacounty.us	SHRF	No	
Brandon Bell	htraining@cuyahogacounty.us	SHRF	No	
Brian Cartwright	htraining@cuyahogacounty.us	SHRF	No	
Brian Cogar	htraining@cuyahogacounty.us	SHRF	No	
Bruce Smith, III	dmatejka@cuyahogacounty.us	SHRF	No	attempted - did not view video
Carl Dotson	tfvozzo@cuyahogacounty.us	SHRF	No	On Leave
Cassandra Perry	htraining@cuyahogacounty.us	SHRF	No	
Chantelle A Carr	dmatejka@cuyahogacounty.us	SHRF	No	



Charis Howard	pleahy@cuyahogacounty.us	SHRF	No	
Charles Enoch	htraining@cuyahogacounty.us	SHRF	No	
Christopher Justus	mcloud@cuyahogacounty.us	SHRF	No	
Christopher Lurker	dmatejka@cuyahogacounty.us	SHRF	No	
Christopher Quarles	htraining@cuyahogacounty.us	SHRF	No	
Craig Harris	dmatejka@cuyahogacounty.us	SHRF	No	attempted - did not view video
D. Paul Soplek	psoplek@cuyahogacounty.us	SHRF	No	On Leave
Darrell Hayes	dmatejka@cuyahogacounty.us	SHRF	No	
Deborah Evans	htraining@cuyahogacounty.us	SHRF	No	
Denise Sims	htraining@cuyahogacounty.us	SHRF	No	
Dennis Flonnoy	htraining@cuyahogacounty.us	SHRF	No	
Deonte Gibson	dmatejka@cuyahogacounty.us	SHRF	No	attempted - did not view video
Douglas Salaam	dmatejka@cuyahogacounty.us	SHRF	No	
Dustin Powell	bkwilliams@cuyahogacounty.us	SHRF	No	
Dustin Scott	dmatejka@cuyahogacounty.us	SHRF	No	attempted - did not view video
Dyann Corrao	bsallee@cuyahogacounty.us	SHRF	No	
Frank Feezell	ffvozzo@cuyahogacounty.us	SHRF	No	On Leave
Frederick Barthany	htraining@cuyahogacounty.us	SHRF	No	
Frederick Ferguson	pleahy@cuyahogacounty.us	SHRF	No	On Leave
George Booth	htraining@cuyahogacounty.us	SHRF	No	
Gregory Clark	mcloud@cuyahogacounty.us	SHRF	No	
Gwendolyn L Holt	mcloud@cuyahogacounty.us	SHRF	No	
Inger Franklin	mcloud@cuyahogacounty.us	SHRF	No	
Ira Dantzier	mcloud@cuyahogacounty.us	SHRF	No	attempted - did not view video
James Moyer	htraining@cuyahogacounty.us	SHRF	No	
James Niziolek	bkwilliams@cuyahogacounty.us	SHRF	No	attempted - did not view video
James Taylor	dmatejka@cuyahogacounty.us	SHRF	No	
James Zappe	jzappe@cuyahogacounty.us	SHRF	No	
Jarah Simmons	bkwilliams@cuyahogacounty.us	SHRF	No	
Jasmine Harwell	dmatejka@cuyahogacounty.us	SHRF	No	
Jeffrey Kowalski	dmatejka@cuyahogacounty.us	SHRF	No	
Jeffri Black	pleahy@cuyahogacounty.us	SHRF	No	attempted - did not view video
Jeremy Burnette	dmatejka@cuyahogacounty.us	SHRF	No	
Jessica Love	htraining@cuyahogacounty.us	SHRF	No	1/11/18 no longer employed
Jimmie Gibson	htraining@cuyahogacounty.us	SHRF	No	
Jl Smith	mcloud@cuyahogacounty.us	SHRF	No	
Joe Hopgood	dmatejka@cuyahogacounty.us	SHRF	No	

John A McCloud	mcloud@cuyahogacounty.us	SHRF	No	
John Doss	dmatejka@cuyahogacounty.us	SHRF	No	
John Kuntz	dmatejka@cuyahogacounty.us	SHRF	No	
John Mirrotto	hrrtraining@cuyahogacounty.us	SHRF	No	
John Trevis	mcarroll@cuyahogacounty.us	SHRF	No	On Leave
Joseph Adams	mcloud@cuyahogacounty.us	SHRF	No	
Joshua Smith	dmatejka@cuyahogacounty.us	SHRF	No	
Justin Kannard	mcloud@cuyahogacounty.us	SHRF	No	
Kalin Berry	mcloud@cuyahogacounty.us	SHRF	No	
Katrina Fullen	hrrtraining@cuyahogacounty.us	SHRF	No	
Kelly Tutstone	dmatejka@cuyahogacounty.us	SHRF	No	attempted - did not view video
Kenneth Brodnik	hrrtraining@cuyahogacounty.us	SHRF	No	attempted - did not view video
Kimberly Brown-Wiggins	dmatejka@cuyahogacounty.us	SHRF	No	
Kimberly Johnson	dmatejka@cuyahogacounty.us	SHRF	No	attempted - did not view video
Kyisha S Ware	dmatejka@cuyahogacounty.us	SHRF	No	
Lamar Jones	abroeckel@cuyahogacounty.us	SHRF	No	
Lilliann Santiago	rtolve@cuyahogacounty.us	SHRF	No	
Lisa Brunnet	tfvozzo@cuyahogacounty.us	SHRF	No	On Leave
Lori True	bsallee@cuyahogacounty.us	SHRF	No	attempted - did not view video
Marcus Pulphus	hrrtraining@cuyahogacounty.us	SHRF	No	
Marvin Miller	bkwilliams@cuyahogacounty.us	SHRF	No	
Matthew Johnson	hrrtraining@cuyahogacounty.us	SHRF	No	
Michael Bell	pleahy@cuyahogacounty.us	SHRF	No	
Michael Fahay	kodonnell@cuyahogacounty.us	SHRF	No	attempted - did not view video
Michelle Love	mcloud@cuyahogacounty.us	SHRF	No	attempted - did not view video
Neil Walters	nwalters@cuyahogacounty.us	SHRF	No	attempted - did not view video
Nicole Vazquez	mcloud@cuyahogacounty.us	SHRF	No	
Pamela Sparks	hrrtraining@cuyahogacounty.us	SHRF	No	
Patricia Davis Mitchell	dmatejka@cuyahogacounty.us	SHRF	No	
Patrick Burke	pburke@cuyahogacounty.us	SHRF	No	
Patrick Madden	bkwilliams@cuyahogacounty.us	SHRF	No	On Leave
Paul Huseman	phuseman@cuyahogacounty.us	SHRF	No	
Phyllis Brawn	pchristopher@cuyahogacounty.us	SHRF	No	
Ragena Inge	hrrtraining@cuyahogacounty.us	SHRF	No	
Ramone Flores	dmatejka@cuyahogacounty.us	SHRF	No	attempted - did not view video
Randolph Gay	mcloud@cuyahogacounty.us	SHRF	No	
Randy Hilverding	dmatejka@cuyahogacounty.us	SHRF	No	



Randy Pyles	pchristopher@cuyahogacounty.us	SHRF	No	
Renaë Harris	dmatejka@cuyahogacounty.us	SHRF	No	
Robert Williams	abrockel@cuyahogacounty.us	SHRF	No	On Leave
Rocky Mcleod	dmatejka@cuyahogacounty.us	SHRF	No	
Ronald Jones Jr	bkwilliams@cuyahogacounty.us	SHRF	No	attempted - did not view video
Roosevelt Peterson	dmatejka@cuyahogacounty.us	SHRF	No	attempted - did not view video
Russel Johnson	htraining@cuyahogacounty.us	SHRF	No	
Ryan Byrne	htraining@cuyahogacounty.us	SHRF	No	
Shannon Mcpherson	htraining@cuyahogacounty.us	SHRF	No	
Shawn Brown	sebjune22@aol.com	SHRF	No	
Shelley Mccoy	htraining@cuyahogacounty.us	SHRF	No	On Leave
Shirley Lawrence	htraining@cuyahogacounty.us	SHRF	No	On Leave
Steven Balog	rtolve@cuyahogacounty.us	SHRF	No	
Steven C Perkins	dmatejka@cuyahogacounty.us	SHRF	No	
Steven Smith	dmatejka@cuyahogacounty.us	SHRF	No	
Tammy Tolbert	bkwilliams@cuyahogacounty.us	SHRF	No	
Te' Ona Parker-Jackson	dmatejka@cuyahogacounty.us	SHRF	No	
Terrance Williams	htraining@cuyahogacounty.us	SHRF	No	
Terrance Snyder	bkwilliams@cuyahogacounty.us	SHRF	No	
Terry Neff	htraining@cuyahogacounty.us	SHRF	No	
Thomas Banker	tbanker@cuyahogacounty.us	SHRF	No	
Tony Fountaine	htraining@cuyahogacounty.us	SHRF	No	
Victor Hester	htraining@cuyahogacounty.us	SHRF	No	
Walter Baker	dmatejka@cuyahogacounty.us	SHRF	No	On Leave
William Haines	htraining@cuyahogacounty.us	SHRF	No	

## Ethics Distribution Responsibilities

Human Resources is responsible for distributing the Ethics Policy to new employees, elected officials and board members who are within Executive Agencies, including County Council. Staff receive training on the Ethics Policy via a PowerPoint presentation and discussion. Staff are notified of where to locate the full Ethics Policy, then sign an Ethics Acknowledgement form as confirmation of receipt of the information. All staff on the 2017 New Employee list and on the 2017 Elected Officials and Board Members lists have signed acknowledgements on file with Human Resources.

B



## Whistleblower Policy Posting Information

Building Location	Posting Location	Responsible Party
1642 Lakeside	<ul style="list-style-type: none"> <li>2<sup>nd</sup> floor display case</li> </ul>	<b>Tamika Pearson</b> 216-348-3891 <a href="mailto:tpearson@cuyahogacounty.us">tpearson@cuyahogacounty.us</a>
Justice Center 1215 W 3 <sup>rd</sup> Street	<ul style="list-style-type: none"> <li>Posted outside HR</li> <li>Posted in Correction Officer break room</li> </ul>	<b>Kimberly Coleman</b> 216-443-6052 <a href="mailto:kcoleman@cuyahogacounty.us">kcoleman@cuyahogacounty.us</a> <b>Rezarta Dano</b> 216-348-3993 <a href="mailto:Rdano@cuyahogacounty.us">Rdano@cuyahogacounty.us</a> <b>Leigh Harris</b> 216-348-3856 <a href="mailto:lharris@cuyahogacounty.us">lharris@cuyahogacounty.us</a> <b>Emina Paunesku</b> 216-443-6248 <a href="mailto:espaunesku@cuyahogacounty.us">espaunesku@cuyahogacounty.us</a>
DSAS 13815 Kinsman Rd	<ul style="list-style-type: none"> <li>4-5 copies on both the 2<sup>nd</sup> and 3<sup>rd</sup> floors</li> <li>handouts outside HR</li> </ul>	<b>Jainice Belcher</b> 216-698-8930 <a href="mailto:Jainice.Belcher@jfs.ohio.gov">Jainice.Belcher@jfs.ohio.gov</a>
VEB 1641 Payne Ave	<ul style="list-style-type: none"> <li>Posted on each floor on Payne side</li> <li>Posted on lower level of Superior side</li> </ul>	<b>Brittany Jones</b> 216-987-7098 <a href="mailto:Brittany.Jones@jfs.ohio.gov">Brittany.Jones@jfs.ohio.gov</a> <b>Aida Idiaquez</b> 216-987-8433 <a href="mailto:Aida.Idiaquez@jfs.ohio.gov">Aida.Idiaquez@jfs.ohio.gov</a>
Admin HQ 2079 E 9 <sup>th</sup> St	<ul style="list-style-type: none"> <li>Posted on each floor</li> </ul>	<b>Yolanda Guzman</b> 216-443-5813 <a href="mailto:yguzman@cuyahogacounty.us">yguzman@cuyahogacounty.us</a> <b>Jonathan Zerulik</b> 216-698-6865 <a href="mailto:jzerulik@cuyahogacounty.us">jzerulik@cuyahogacounty.us</a>
JEH 3955 Euclid Ave	<ul style="list-style-type: none"> <li>Posted in HR and on bulletin boards in building</li> </ul>	<b>Tomika Ballard</b> 216-881-2491 <a href="mailto:Tomika.ballard@jfs.ohio.gov">Tomika.ballard@jfs.ohio.gov</a>
Old Brooklyn NFSC 4261 Fulton Pkwy	<ul style="list-style-type: none"> <li>Posted on employee bulletin boards</li> </ul>	<b>Tamara Mearig</b> 216-881-3540 <a href="mailto:Tamara.Mearig@jfs.ohio.gov">Tamara.Mearig@jfs.ohio.gov</a>
Westshore NFSC 9830 Lorain Ave	<ul style="list-style-type: none"> <li>Posted on employee bulletin boards</li> </ul>	<b>Michael Brown</b> 216-881-3540 <a href="mailto:Michael.l.brown@jfs.ohio.gov">Michael.l.brown@jfs.ohio.gov</a>



Building Location	Posting Location	Responsible Party
Bridge Garage – PRC 2429 Superior Viaduct	<ul style="list-style-type: none"> <li>Posted on employee bulletin board</li> </ul>	<b>Ciara Stone</b> 216-443-7581 <a href="mailto:cstone@cuyahogacounty.us">cstone@cuyahogacounty.us</a>
MEO 11001 Cedar Ave	<ul style="list-style-type: none"> <li>Posted on employee bulletin board</li> </ul>	<b>Ciara Stone</b> 216-443-7581 <a href="mailto:cstone@cuyahogacounty.us">cstone@cuyahogacounty.us</a>
County Airport 26300 Curtiss Wright Pkwy Richmond Heights	<ul style="list-style-type: none"> <li>Posted on employee bulletin board</li> </ul>	<b>Lynn Ferraro</b> 216-443-8214 <a href="mailto:lferraro@cuyahogacounty.us">lferraro@cuyahogacounty.us</a>
Animal Shelter 9300 Sweet Valley ValleyView	<ul style="list-style-type: none"> <li>Posted on employee bulletin board</li> </ul>	<b>Ciara Stone</b> 216-443-7581 <a href="mailto:cstone@cuyahogacounty.us">cstone@cuyahogacounty.us</a>
York Road Yard York Rd N. Royalton	<ul style="list-style-type: none"> <li>Posted on employee bulletin board</li> </ul>	<b>Ciara Stone</b> 216-443-7581 <a href="mailto:cstone@cuyahogacounty.us">cstone@cuyahogacounty.us</a>
Brookpark Fleet Garage 9500 Brookpark Rd	<ul style="list-style-type: none"> <li>Posted on employee bulletin board</li> </ul>	<b>Ciara Stone</b> 216-443-7581 <a href="mailto:cstone@cuyahogacounty.us">cstone@cuyahogacounty.us</a>
Huntington Park Garage W 3 <sup>rd</sup> St	<ul style="list-style-type: none"> <li>Posted on employee bulletin board</li> </ul>	<b>Ciara Stone</b> 216-443-7581 <a href="mailto:cstone@cuyahogacounty.us">cstone@cuyahogacounty.us</a>
Print Shop 1642 Lakeside	<ul style="list-style-type: none"> <li>Posted on employee bulletin board</li> </ul>	<b>Ciara Stone</b> 216-443-7581 <a href="mailto:cstone@cuyahogacounty.us">cstone@cuyahogacounty.us</a>
Mailroom 1W Lakeside	<ul style="list-style-type: none"> <li>Posted on employee bulletin board</li> </ul>	<b>Ciara Stone</b> 216-443-7581 <a href="mailto:cstone@cuyahogacounty.us">cstone@cuyahogacounty.us</a>
Sanitary Facility 6100 W Canal Rd ValleyView	<ul style="list-style-type: none"> <li>Posted on employee bulletin board</li> </ul>	<b>Ciara Stone</b> 216-443-7581 <a href="mailto:cstone@cuyahogacounty.us">cstone@cuyahogacounty.us</a>



## Whistleblower Policy Distribution

The Whistleblower Policy is shown below.



# Whistleblower Policy

*The Cuyahoga County Ethics Code protects individuals who report unethical behavior on the part of employees of Cuyahoga County.*

### What Must Be Reported?

Current Cuyahoga County Officials and Employees **must** report any behavior on the part of other County employees that is potentially criminal in nature. Such report must be made to the Cuyahoga County Inspector General within 5 business days of the event in question.

### What Can Be Reported?

Any person can report unethical behavior on the part of employees of Cuyahoga County.

This includes:

- Violations of state or federal law;
- Misuse of public resources; or
- Violations of County Ethics Code.

### Where Can You Report?

- Call the Whistleblower Hotline: (216) 698-2999
- Inform your supervisor or department management
- Contact the Cuyahoga County Inspector General
- Contact your local law enforcement authorities if the activity is criminal in nature

### Protections for Whistleblowers

Any County employee who is disciplined or retaliated against for whistleblowing activity may file an appeal with the Cuyahoga County ~~Human Resources~~ Commission.

Personnel Review

*Employees shall not knowingly file false information or file a complaint that is frivolous or malicious in nature, or that is not in good faith.*