

# THE SCHOOL DISTRICT OF PHILADELPHIA

No. 1200

SECTION: Office of Inspector  
General

TITLE: Office of Inspector  
General

ADOPTED: October 19, 2023

REVISED:

## 1200 OFFICE OF INSPECTOR GENERAL

### **Purpose**

The Board of Education (“Board”) recognizes the need for independent and objective oversight in promoting integrity, efficiency and overall effectiveness in The School District of Philadelphia (“District”). The purpose of this policy is to set forth the responsibilities and authority of the Office of Inspector General (“OIG”) that were conferred by Board Action Item 2 of April 25, 2019 and codify and clarify this Policy as the document henceforth governing duties of the OIG and the obligations of District staff and other third parties concerning the OIG.

### **Authority**

The Public School Code and Philadelphia Home Rule Charter permit the Board to adopt and enforce such reasonable rules and regulations as it may deem necessary and proper for its governance as well as the management of the affairs of the District and its operations.

[1][2][3][4][5][6]

### **Delegation of Responsibility**

The Board directs that the Inspector General (“IG”) or their designees, through the Office of Inspector General (“OIG”), conduct independent investigations on its own volition and/or in response to complaints concerning corruption, fraud, criminal activity, waste, abuse, mismanagement, abuse of office, misconduct, conflicts of interest, and/or poor stewardship of public funds (collectively referred to herein as “improper conduct”). [2]

The IG shall provide biannual updates to the Board on its work. The Board’s Chief of Staff shall communicate regularly with the IG regarding administrative matters.

The OIG shall be operationally independent and the IG shall be appointed by and report directly to the Board. The responsibilities of the OIG shall extend to investigations concerning:

- all offices, departments, divisions, units, schools, programs, and agencies of the District and Intermediate Unit 26 (“IU-26”);

- current and former employees;
- other educational entities that receive District funds;
- contractors, subcontractors, and others that directly or indirectly earn or otherwise receive funds or other benefit from the District;
- grantors and donors to the District; and
- contractors, concessionaires, lessees and lessors, licensees and licensors, anyone using District facilities, or any person or entity involved in transactions, partnering, or providing services for or with the District, whether or not involving the exchange of money.

The OIG shall coordinate with other authorities, including federal, state and local law enforcement and regulatory agencies and/or with appropriate District offices and departments. This coordination shall occur as required, unless the OIG determines that such coordination would otherwise impede an investigation or OIG independence.

The delegation of authority to the OIG in this Policy does not affect the authority and responsibility of the Board, the Superintendent, and the District to otherwise exercise their designated powers and fulfill their assigned duties.

All entities and individuals subject to investigation and reviews shall cooperate fully with the OIG by providing complete, truthful, and accurate information. The OIG shall have access to all true, correct and complete information and records, as well as all necessary or appropriate assistance in any matter investigated by the IG and concerning the business or activity of the District, IU-26, recipients of District funds, and prospective contractors or vendors. [7]

District employees are prohibited from taking or threatening to take any action in an attempt to prevent anyone from providing information to, or cooperating with, the OIG, and from retaliating against anyone for doing so. [8]

All District staff, recipients of District funds, and all other categories of individuals or entities referenced herein, shall report any knowledge of improper conduct to the OIG. [9][10]

### **Mandatory Regulatory Procedures**

Upon completion of an investigation, the OIG shall share an internal and pre-decisional draft report with the Board, Superintendent, and OGC to afford opportunity for clarification and response to questions. It will then issue a final report, which may be available on the OIG's website. The OIG, however, may withhold reports from any person, if such person is the subject of the investigation and disclosure may impede an investigation by a law enforcement agency. The Superintendent, or their designee, shall submit a written report to the OIG detailing action taken, or plans to correct improper conduct, or otherwise respond to findings and recommendations made in final OIG reports.

The OIG shall submit an annual report to the Board, Superintendent, and OGC that generally summarizes complaints received during the course of the year, the investigations conducted, the recommendations made, and such other information as appropriate.

Aside from the disclosures expressly authorized herein, the OIG shall keep all records of investigation confidential, including the identities of individuals who provide information in connection with an investigation, to the extent permitted by law. The OIG shall not disclose any information that would violate federal, state or local laws. The OIG shall respect employees' and contractors' due process rights as prescribed by State law, Board policies and/or applicable collective bargaining agreements. [8][11]

**Legal References:**

1. [Home Rule Charter](#), Article XII
2. [Board Action Item 2 of April 25, 2019](#)
3. [Home Rule Charter](#), §12-200
4. [Home Rule Charter](#), §12-300
5. [24 P.S.](#) §4-407
6. [24 P.S.](#) §5-510
7. [Policy](#) 800 - Records Management
8. [43 P.S.](#) §§1421-1428
9. [Policy](#) 828 - Suspected Financial Misconduct and Dishonesty
10. [Policy](#) 317 - Employee Conduct and Reporting Requirements
11. [15 U.S.C.](#) 7201 et seq.

**Related Information:**

1. 003.4 Office of Inspector General Administrative Procedures
2. [47 CFR §54.503](#)
3. [2 CFR §200.318](#)