



Metro

Office of the Auditor

SUMMARY

Metro made progress on all the recommendations in the 2019 audit, **Metro's Code of Ethics: Clarify expectation to support an ethical culture** although little progress was made on the recommendations in the accompanying management letter. Four of the recommendations were implemented and four were in process. The two recommendations in the management letter related to lobbyist registrations were not implemented.

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Code of Ethics Follow-Up

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BACKGROUND

The December 2019 audit found that stronger connections between organizational values, legal requirements, and policies and procedures would help build a better foundation to manage ethics. Without it, Metro was at increased risk of employees interpreting and taking actions based on their own set of values. This could reduce consistency and affect employee and public trust.

Transparency about who was seeking to influence decisions at Metro through lobbying was also identified during the audit. A letter to management in August 2019 summarized a pattern of out-of-date information, which appeared to violate Metro Code requirements. The letter recommended that stronger processes were needed to ensure complete and accurate information was available online.

RESULTS

The follow-up audit found progress was made to implement all the recommendations in the 2019 audit report, although little progress was made on the recommendations in the accompanying management letter. Management updated policies, increased training, and clarified responsibilities. These efforts strengthened the foundation for managing ethics, removed barriers to understanding ethical expectations, and increased consistency when addressing ethical concerns.

One area of continued risk was managing potential conflicts of interest in grants and contracts. The hybrid remote work environment changed some processes. As a result, it was more difficult to determine if the conflict of interest disclosure policy was followed. No actual conflicts of interests were identified in this follow-up audit.

The follow-up also found little progress was made on the recommendations contained in a letter to management regarding lobbyist information. Responsibilities were not clearly assigned and the requirements in Metro Code were not well understood. These issues reduced transparency about who was seeking to influence decisions.

Exhibit 1 Status of Recommendations

2019 Audit Recommendations	Status
To strengthen Metro’s foundation for ethics, senior management should:	
1. Integrate the Code of Ethics with related policies, laws, and organizational values to make relevant guidance easier to find.	In process
To reduce barriers to understanding ethical expectations, senior management should:	
2. Update Metro’s ethics-related policies to ensure they cover all employees and provide consistent definitions and instructions.	In process
3. Establish guidance for using safe harbor.	In process
4. Provide ethics training that: <ul style="list-style-type: none"> a. includes Metro’s ethics-related policies and how to apply them; b. uses a variety of media types to accommodate different learning styles; and c. is required annually of all employees 	Implemented
5. Remind employees of ethical expectations periodically through agency-wide communications and events	In process
To consistently address potential ethical issues, the Chief Operating Officer should:	
6. Assign responsibility for analyzing ethics-related trends and risks at Metro	Implemented
7. Use the analysis to determine if additional preventative or corrective measures are needed	Implemented
8. Clarify department roles and responsibilities for investigating potential ethical issues	Implemented
2019 Management Letter Recommendations	Status
In order to ensure that lobbyist registrations are kept up to date, Metro should:	
A. Strengthen controls to ensure lobbyist registrations are kept up-to-date; and	Not implemented
B. Clearly assign responsibilities to: <ul style="list-style-type: none"> i. ensure lobbyist requirements are being followed; and ii. maintain updated lobbyist information online 	Not implemented

Source: Metro Auditor’s Office analysis of documents and interviews

Sustain progress to ensure effectiveness

Management made substantial progress on all recommendations made in the 2019 audit except those related to lobbyist registrations. Metro adopted an updated Employee Ethics policy. The Ethics policy replaced some older policies. This helped resolve prior inconsistencies. The new policy also integrated some other ethical requirements and clarified to whom requirements applied. For example, the Ethics policy mentioned Metro's Conflict of Interest Disclosure policy, Metro Code, and state ethics laws.

Although Metro clarified guidance some barriers remained that could create an opportunity for inconsistent management. The Ethics policy did not integrate Metro's organizational values. This may cause employees to think the policy was the only ethical standard.

Metro developed a strategic framework to guide the agency through 2024. It outlined principles of racial justice, climate justice and resilience, and shared prosperity. It was unclear whether those principles replaced a previous set of values. Some senior leaders pointed to the framework as a source of Metro values. Without connecting the framework principles to the Ethics policy, they may not be reinforced or seen as important as other ethical standards. Either could reduce consistency and trust.

The Ethics policy listed principles that were addressed by other ethics-related policies, but it did not reference those policies. This made relevant guidance harder to access. For example, the policy stated that "Whistleblowing is appropriate on unlawful or improper actions and should be done with no threat of reprisals." But the policy did not mention that Metro had a whistleblowing policy. Metro's nepotism policy specified procedures to prevent favoritism or unfairness in the workplace due to family and personal relationships. Not mentioning it in the Ethics policy could make employees less likely to apply those procedures.

Metro's ethics-related policies were also broader than the principles listed in the Ethics policy itself. These included new, updated, and established policies about conduct expectations. For example, there were eight policies to support a safe and inclusive workplace. None of those policies were mentioned in the Ethics policy.

Exhibit 2 Metro’s Ethics policy did not integrate several ethics-related policies

- Acceptable Use of Metro Resources
- Anti-Bullying*
- Conduct Expectations*
- Discrimination and Harassment-Free Workplace*
- Drug & Alcohol Use
- Employee Conduct*
- Gender Inclusion*
- IT Acceptable Use
- Nepotism and Personal Relationships in the Workplace
- Non Retaliation*
- Political Activity by Public Employees
- Supervisor Expectations & Responsibilities*
- Whistleblowing*

**Metro policies that support a safe and inclusive workplace
Source: Metro Auditor’s Office analysis of Metro policies*

Metro posted most policies on an internal webpage. The webpage organized the policies into sections. This was an area of improvement. It made the policies easier for employees to navigate, which strengthened the agency’s foundation for ethics.

However, it was difficult to determine the status of one ethics-related policy that was not posted on that webpage: Employee Conduct. The content of the Employee Conduct policy was from 2007. Most of it had been replaced, but some provisions may still be in effect.

The way information is organized on the internal webpage can help employees understand expectations and see the alignment with Metro’s organizational value. Ensuring there is a periodic process to update policies, remove outdated ones, and link policies with organizational values could be a low-cost way to ensure the risks identified in the original audit are not repeated.

Metro’s use of the Secretary of State’s safe harbor process to review election-related material provided a good example of how guidance and policy considerations can change quickly. In response to a 2019 audit recommendation, senior management stated that they would use safe harbor to assure compliance with restrictions on political campaigning. Metro sought and was granted safe harbor for informational materials associated with all the ballot measures it filed since the 2019 audit.

Metro’s practice was to produce multiple documents for each measure and submit them for review. However, for the November 2022 election, the Secretary of State’s Office declined to review substantially similar material twice. This was a change from their past practice. That meant Metro could use previously approved material or publish unreviewed material. If Metro chose to publish unreviewed material that deviated from what was approved, it may elicit a complaint that it violated state election law and could face penalties and legal fees. The agency agreed to pay a contractor \$325 per hour

to respond to an election complaint filed against Metro Council in 2018.

We determined that the status of the 2019 recommendation was in process. Metro used safe harbor, but changes at the Secretary of State created additional risks for Metro. Updating guidance or creating a written policy would help employees navigate these new dynamics.

Training recommendations implemented

The 2019 audit found that training was ineffective because few employees attended, ethics policies were largely excluded, and they were not presented in a relatable manner. As a result, employees may have been unfamiliar with ethics policies and unlikely to apply them.

Two ethics courses were available to employees. One was Oregon Government Ethics Law Training provided by Oregon's Government Ethics Commission. It was offered twice to Metro employees. The training was not required and only 1% of Metro employees took it. The 2019 audit recommended that senior management provide ethics training that included Metro's ethics-related policies and how to apply them, used a variety of media types to accommodate different learning styles, and was required annually of all employees.

During the follow-up audit, we found the recommendation was implemented. Management communicated a new requirement for all employees to participate in regular ethics training. The ethics law training learning objectives included defining Conflict of Interest, among others. Management also developed several other trainings related to ethics as part of the Safe and Inclusive Workplace initiative. These required trainings were only recently implemented. As a result, the follow-up audit did not assess employee participation in them. In the future, tracking employee attendance will be crucial to ensure employee training requirements are sustained.

Continue to communicate about ethics

Communications from senior leadership about ethics and their importance to an organization is another way to ensure effective management. The 2019 audit found that employee communications infrequently referenced ethics policies. Without frequent communications, employees may be less aware of expectations, and more likely to take action that does not meet them. The original audit recommended that senior management remind employees of ethical expectations periodically through agency-wide communications and events.

For the follow-up audit, we found that recommendation five was in process. Management communicated periodically about trainings related to ethics. However, annual reminders about restrictions on political activity using public resources were inconsistent. We heard that email reminders about restrictions on political activity were sent prior to some elections following the original audit, but not all. We learned that management planned to send reminders prior to every election in the future. Moving forward, to achieve implementation of this recommendation, management should continue to remind employees of ethical expectations periodically through agency-wide communications and events.

Analysis of ethics-related risks and trends began in January 2022

The 2019 audit found that Metro did not systematically collect or analyze information about potential ethical issues. Without a reliable means to evaluate ethics, Metro was less able to identify trends or risk areas. This made it hard to know whether Metro needed to do more to address issues, or whether its efforts were sufficient.

The audit recommended that senior management assign responsibility for analyzing ethics-related trends and risks. It also recommended that the analysis be used to identify whether additional preventive and corrective actions were needed.

The follow-up audit found that both recommendations were implemented. Human Resources (HR) and Office of Metro Attorney (OMA) were assigned the role of identifying trends and presenting their findings annually. We learned that they implemented the process for the first time in January 2022.

The results of their analysis were used to identify preventative and corrective action in an email to senior management. The email recommended analysis of processes and training to prevent similar issues from repeating. Moving forward, management should continue to use this process to systematically gather data and recommend preventative and corrective actions.

New software put in place in 2022 has the potential to organize reports based on themes, which may make it easier to replicate the process from year to year. However, we heard that some investigations were conducted by an external contractor and that the results of those investigations may not always be included in the case management system. If not, they may not be considered in annual analysis of risks and trends.

Investigation roles were clarified

The 2019 audit found it was unclear who would take the lead to investigate some potential ethical issues. Policies were also unclear or inconsistent about who should investigate potential violations. The audit recommended that the Chief Operating Officer clarify department roles and responsibilities for investigating potential ethical issues.

The follow-up audit found that the recommendation was implemented. Management created new information about what to expect during an investigation, created more guidance about how to report concerns, and documented procedures for investigating potential policy violations.

To ensure ongoing effectiveness, it will be important to periodically update these documents and continue to make them available to employees. Guidance can be forgotten or replaced when procedures, personnel, or policies change. For example, some of the fifteen policies related to ethics did not define investigation roles. In addition, some potential policy violations may be investigated by external contractors. This could impact employee willingness to report concerns. HR's summary documents mitigate many of those potential weaknesses. To build trust and ensure consistency, employees need to know where to find the most up-to-date versions.

Increase consistency to improve transparency

The 2019 audit found that Metro’s Conflict of Interest Disclosure policy was unclear which employees were required to complete the disclosure form to comply with state law and Metro Code. The policy indicated that only those employees who participate or may participate in contracting, procurement, or grant-making must complete the form. This could give the impression that relevant laws only applied to some employees.

The most recent management response to the audit noted that management updated the previous Conflict of Interest policy and consolidated it under the new Employee Ethics policy. This policy contains an overview of Conflict of Interest and refers employees to procedures included in the Conflict of Interest Disclosure policy.

For the follow-up audit, we found that Conflict of Interest Disclosure policy was not updated. The Conflict of Interest Disclosure policy guides employees in how they should document potential conflicts of interest in accordance with state law. The form prompted employees that participate or may participate in contracting to declare either an actual or potential conflict of interest if they had one. The form also prompted supervisors and managers to complete the form if they have an actual or potential conflict, or if they have no conflicts.

We found that use of the disclosure form was inconsistent, which decreased transparency. We reviewed disclosure forms submitted in the last three years. This was used to determine if employees who had disclosed a potential conflict of interest had participated in making a financial award. We found some instances where managers did not sign the form, but we did not identify any conflicts of interest. We also noticed additional documentation challenges that appeared to be caused by the use of electronic forms. These documents showed mismatches between names and signatures on some forms.

With high dollar amount contracts or contracts that involve approval exemptions in particular, documentation that employees have acknowledged the Conflict of Interest policy could reduce risks. In the event of a concern related to conflicts of interest, managers may rely on documentation to confirm that there were no conflicts of interest. If there were no documents, or if the documentation was inconsistent, this could increase the time and resources spent investigating the issue.

Consistent documentation related to conflicts of interest also improves transparency. Transparency helps maintain public trust that financial awards through contracts and grants were fairly awarded. Consistently documenting review of the policy could improve transparency.

Stronger processes needed to ensure lobbyists meet registration requirements

A letter to management was sent in August 2019 documenting that lobbyist information online was out-of-date in 2015, 2017, and 2019. The letter included recommendations to strengthen processes to ensure lobbyist registrations were kept up to date and to clearly assign responsibilities to ensure that lobbyist requirements were being followed.

Metro Code requires any person who spends more than five hours every three months lobbying to register with Council. The purpose of these requirements is to increase transparency for the public about those seeking to influence decisions.

Lobbying means influencing or attempting to influence legislative action through oral or written communication with Metro officials. Metro officials include managers, department directors, Metropolitan Exposition and Recreation Commissioners (MERC), and elected officials. Lobbying also includes solicitation of others to influence or attempt to influence legislative action or attempting to obtain the good will of Councilors.

This follow-up audit found existing lobbyist registrations were updated every two years, but processes to ensure information online was accurate and complete were still lacking. The information on Metro's website was inconsistent with requirements in Metro Code. As a result, some lobbyists may not be registered because they think the requirements only apply to their time lobbying Metro Council.

There were also cases where information posted online was inconsistent with information provided by registered lobbyists. Metro Code requires lobbyists to file a statement containing the name of the lobbyist's employer, a description of the employer, and the subjects of legislative interest. It instructs lobbyists to provide information for each entity they represent.

In most cases, the information posted online was different from what was provided by lobbyists when they registered. Metro did not list two registered lobbyists on its website, which meant the online information was incomplete. Another registered lobbyist was associated with only one of its employers online. In addition, the majority of lobbyists' interests online did not match what they provided. This meant the information online was not accurate.

Exhibit 3 Examples of lobbyists’ interests online that did not match the interests they provided

Issue(s) Posted Online	Stated Interest(s)
Rights-of way, emergency response, land use, climate action	Land use, climate policy, transportation, housing, and waste/ recycling management, renewable natural gas
Municipal	Metro policies that impact the cities located within the jurisdiction of the Metro region
Housing	Homelessness/Housing crisis advocacy
Land use, transportation, housing	Land use
Solid waste	Recycling, dry waste processing, solid waste, MRF, commercial and residential organics

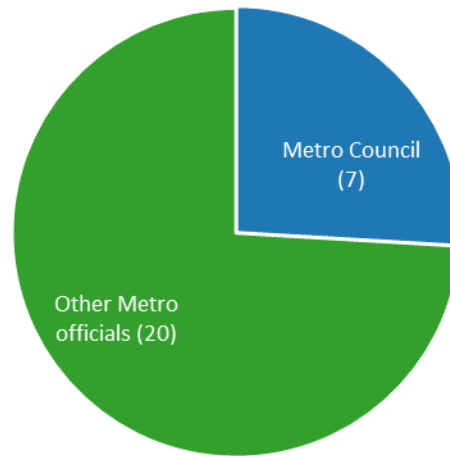
Source: Metro Auditor’s Office analysis of lobbyist registration forms and lobbyist information on Metro’s website

These inconsistencies appeared to have two potential causes. Employees may have changed the information submitted by lobbyists or may not have updated information online for lobbyist who had been previously registered. Guidance to manage the registration process would help employees know what should be posted online and what sources should be used to ensure complete and accurate information.

Government Affairs and Policy Development (GAPD) personnel thought the requirements applied to only lobbyists of elected officials. In Metro Code, legislative action means introduction, sponsorship, testimony, debate, voting, or any other official action on any ordinance, resolution, amendment, nomination, appointment or report, or any matter which may be the subject of action by the Council or any committee thereof. Both Council and MERC vote on legislation and receive reports from departments and venues.

Information on Metro’s website reflected a narrow interpretation of lobbyist registration requirements. As a result, some lobbyists would not know the requirements applied to them. The follow-up audit determined that communication with at least twenty other Metro officials may qualify as time spent lobbying as defined by Code.

Exhibit 4 Employees interpreted lobbyist registration requirements to only apply to Metro Council*



Source: Metro Auditor's Office analysis of Metro Code and FY 2022-23 Adopted Budget

**Other Metro officials include heads of departments/venues and commissioners. This chart does not include managers or Metro Auditor.*

Lobbyists needed to state relationships with some Metro officials, but not others, in their registrations. This difference may have contributed to inconsistent guidance. Metro Code required lobbyists to name any member of the Council who was employed by or associated with the same business as them. It did not require them to name other Metro officials with whom they had employment or business relationships.

In one case, a lobbyist and a Metro official shared an employer. But, consistent with Metro Code, the relationship was not stated. Requiring lobbyists to name any Metro official who was employed by or associated with the same business as the lobbyist would make their relationships more transparent.

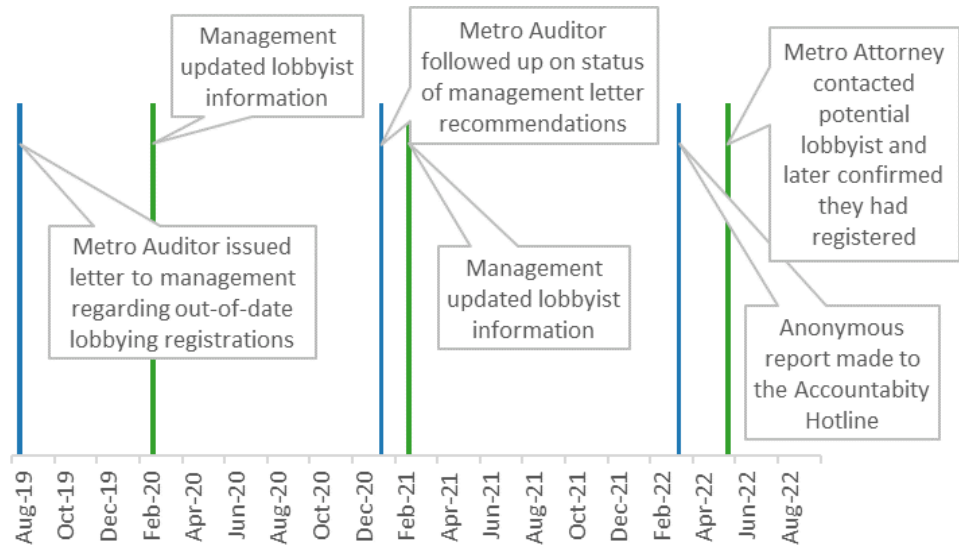
The follow-up audit found responsibilities to ensure requirements were being followed were not clearly assigned. Employees in GAPD contacted registered lobbyists when their registrations expired, but it was unclear who was responsible for determining if anyone else needed to register. As a result, there was no effort to identify new lobbyists since February 2020.

Management stated that a specific position would be responsible for the program once that position was filled. Management filled the position twice since April 2020. However, it did not document responsibility for the program. The position description did not include lobbyist registration and understanding of the requirements was weak among involved personnel.

Employees encouraged lobbyists to renew their registrations in 2020 and 2021. But the information may not capture individuals who lobbied Metro between updates or who have never registered. In 2019, 2020, and 2021, management stated that an employee would work with Council Office staff

and Metro officials to review meetings with external entities on a quarterly basis to determine if individuals have spent more than five hours lobbying. We found that quarterly reviews had not occurred between September 2019 and September 2022.

Exhibit 5 Metro Auditor has prompted management updates to lobbyist information for the last three years



Source: Metro Auditor’s Office analysis of Metro Auditor and management correspondence

Although some responsibilities had been assigned, Metro was unprepared to respond to questions about the requirements to register. An anonymous complaint that a lobbyist had not registered as required was made to the Accountability Hotline in March 2022. On average, hotline cases were resolved in about 19 days that year. It took 77 days and consultation with GAPD and OMA to address the complaint.

In May 2022, the Metro Auditor sought to change Code to take responsibility for managing the process. Later that month, OMA concluded that Metro Charter prevents the Auditor from taking on the function. Clearly assigning responsibility for lobbyists registrations and documenting procedures would help ensure compliance with Metro Code and increase transparency about who has sought to influence decisions.

SCOPE & METHODOLOGY

The purpose of this audit was to assess the status of recommendations from the 2019 Code of Ethics audit. There were three objectives:

1. Summarize conclusions reached in the survey phase of the audit about recommendations one through five.
2. Determine if sufficient preventative action was taken to ensure that lobbyist registration information was kept up to date online to address management letter recommendations A and B.
3. Determine if Metro had effective controls in place to detect potential ethical issues, including conflicts of interest, related to recommendations six through eight.

The audit scope included activities carried out since the initial audit was released in December 2019 and analysis of some events leading up to and following the release of the August 2019 Management Letter about lobbyist registration.

To meet the audit objectives, we interviewed Metro employees involved in implementation, including Human Resources and Office of Metro Attorney leadership. We reviewed training, policy, and emails. We also reviewed lobbyist registration information, conflict of interest disclosure forms, contracts, and information about the investigation process.

This audit was included in the FY 2022-23 audit schedule. We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.



Memo

Date: Monday, February 13, 2023
To: Brian Evans, Metro Auditor
From: Andrew Scott, Deputy Chief Operating Officer
Subject: Code of Ethics Audit -Management Response

Thank you for your follow up on the 2019 Code of Ethics Audit. We agree with the Auditor’s findings in the follow-up to this audit and appreciate the Auditor and his staff’s work on this issue. We look forward to moving forward on these recommendations and are pleased that the Auditor finds that Metro has successfully implemented recommendations 4, 6, 7, and 8.

With regards to audit recommendations 1, 2, and 5, these are focused on ensuring that ethics are integrated in Metro’s laws, policies, and values; that those policies are clear and consistent and cover all employees; and that employees are reminded throughout the year of their ethical obligations and expectations. Management agrees that this is, and needs to remain, a core value of our organization. We appreciate the Auditor’s recommendations and will continue moving forward with this work. Due to the length of time needed for policy changes, management plans to fully implement these recommendations by June 30, 2024. However, in the meantime we will ensure that employees are aware of their ethical expectations through agency-wide communications as well as in department-level staff meetings.

For audit recommendation 3 regarding establishing guidance for using safe harbor, management did provide clear guidance to staff following the original audit. However, during the Parks levy measure the Secretary of State’s office changed the way they review and respond to these requests, informing Metro that they would no longer be reviewing materials that are substantially similar to materials that had previously been given safe harbor. This creates a risk, albeit small, that new materials could be challenged as containing political advocacy in violation of ORS 260.432. Management believes that it is important for government to provide accurate, objective, nonpolitical information for voters, especially during a time of growing misinformation, and we plan to continue doing so. We will work with the Secretary of State to understand their new procedure and develop guidance for staff.

Recommendation 1: Integrate the Code of Ethics with related policies, laws, and organizational values to make relevant guidance easier to find.

- **Response:** Management agrees with the recommendation.
- **Proposed plan:** OMA and HR will collaborate on updating Metro’s Code of Ethics to align with related policies, laws and organizational values to improve integration and accessibility to these documents.
- **Timeline:** June 30, 2024

Recommendation 2: Update Metro’s ethics-related policies to ensure they cover all employees and provide consistent definitions and instructions.

- **Response:** Management agrees with the recommendation.
- **Proposed plan:** Metro's Code of Ethics and related policies will be updated. Over time, definitions will be removed from the individual policies and will be available in a single definitions glossary.
- **Timeline:** June 30, 2024

Recommendation 3: Establish guidance for using safe harbor.

- **Response:** Management agrees with the recommendation.
- **Proposed plan:** We will work with the Secretary of State to understand their new procedure and develop guidance for staff.
- **Timeline:** Ongoing

Recommendation 5: Remind employees of ethical expectations periodically through agency-wide communications.

- **Response:** Management agrees with the recommendation.
- **Proposed plan:** Ethics reminders will continue to be included and dispersed per the HR response to audit recommendations. These include:
 - Political activity email reminder (prior to every primary, general or special election).
 - Reminder every odd numbered year of the online Employee Ethics course requirement.
 - COO to ask directors and managers to directly and routinely discuss ethics as an agenda item at a regular staff meeting, no less than once per year.
- **Timeline:** Ongoing



Date: February 16, 2023
To: Brian Evans, Metro Auditor
From: Andrew Scott, Deputy Chief Operating Officer
Subject: Code of Ethics Follow-up Audit -Lobbyist Registration-Management Response

In August 2019, the Auditor sent a letter to the COO regarding Metro’s process for registration of lobbyists. The Auditor’s 2023 Code of Ethics follow-up audit reinforced the need for Metro to maintain stronger processes to ensure lobbyists meet registration requirements. Overall, Metro has strived to improve our compliance with Metro code, though progress was interrupted by staff turnover and COVID-related workflow difficulties. Metro’s Government Affairs and Policy Development (GAPD) team, along with the Council Office, is taking steps to ensure best practices for lobbyist registration requirements.

Metro code requires individuals who receive compensation for lobbying and spend more than five hours every three months lobbying to register with Metro. Although responsibility for registering lies solely with the lobbyist, Metro posts the lobbyist registrations so that we can be transparent about who is lobbying Metro officials.

The registration form for lobbyists is posted on the Metro lobbyist registration webpage and lobbyists are asked to complete it and return it to the GAPD coordinator. Going forward, management will ensure that the GAPD coordinator takes the following actions:

- Record and store the registration forms in one filing location.
- Perform an annual audit of the Metro lobbyist registration webpage every January to review any expired registrations and email each lobbyist to encourage re-registration.
- Review the weekly Councilor “External Meetings” list and consult with Council Office staff every quarter to identify individuals who may be meeting or nearing the threshold for registering and contact the potential lobbyists.

The Auditor noted that some lobbyists may not be registered because they think the registration requirements only apply to lobbying the Metro Council whereas the Metro Code states lobbying includes influencing or attempting to influence “Metro officials.” A "Metro official" means any department director, manager, elected official or Metro commissioner. Management intends to include the definition of “Metro official” on the lobbyist registration website along with the already published definitions of “lobbyist” and “lobbying” to promote greater clarity and help potential lobbyists understand their responsibilities. We will also clarify the lobbyist registration page to remove language suggesting that only those lobbying Metro Council need register.

The Auditor also notes that lobbyist information posted online was inconsistent with the actual information submitted by lobbyists or incomplete. In the future the GAPD coordinator will doublecheck all submissions to ensure accuracy on the Metro website and will post what is submitted by lobbyists as close to verbatim as possible to ensure accurate and complete information is posted online. Finally, the lobbyist registration duties will be added to the GAPD coordinator position description, and process documents related to this body of work will include more detail to ensure understanding of the responsibilities.

