


<b>F R O M</b>	<b>NAME &amp; TITLE</b>	Mary H. Talley <i>Mary H. Talley</i> Director & Chief Human Capital Officer	<b>CITY of</b> <b>BALTIMORE</b> <b>MEMO</b>	
	<b>AGENCY NAME &amp; ADDRESS</b>	Department of Human Resources 201 East Baltimore Street, Suite 300		
	<b>SUBJECT</b>	City of Baltimore Council Bill, 15-0568 "Public Ethics Law – Administrative Modifications"		

**TO:** The Honorable Bernard "Jack" Young  
and Members of the Baltimore City Council  
City Hall  
100 N. Holliday Street, Room 409  
Baltimore, Maryland 21202

**DATE:** February 25, 2016

Dear Council President Young and Members of the City Council:

***Recommended Position***

The Department of Human Resources ("DHR") reviewed the above captioned City Council Bill and opposes the proposed changes to Baltimore City Code, Article 8, Subtitle 7, Ethics – Financial Disclosure regarding the supplemental list by the Director of Human Resources. DHR takes no position to the remainder of the modifications in the proposed bill. The legislation proposes to modify the current method the Ethics Board receives its list of public servants required to file Financial Disclosure statements.

***Comments and Analysis***

As proposed, City Council Bill 15-0568 (the "Bill"), is not administratively feasible. The Bill requires agency heads to provide the Ethics Board a list of names and position numbers of persons required to file financial disclosure statements with a copy to the Director of Human Resources by February 28th of each year. By March 15<sup>th</sup>, the Director of Human Resources must provide a supplemental list of all persons described in § 7-9 "Procurement, legislative liaison, and enforcement personnel" who are not identified in agency lists in the modified version of § 7-1.1.A. The request of such information is impracticable since our Human Resources Information System ("HRIS") does not capture the required information necessary for the proposed supplemental list. Specifically, how persons are classified in job positions through our HRIS does not correspond to which positions are required to file financial disclosure statements, making it improbable for DHR to generate the proposed report. Further, the information necessary for the proposed report is not currently captured in any databases maintained by DHR. Accordingly, the proposed bill would impose a new obligation upon DHR which the agency does not have the capacity to absorb.

For these reasons, DHR opposes this section of the bill. DHR does not have a position on the remainder of the proposed modifications.

*opposes/  
No position*

