



OHIO DEPARTMENT OF TRANSPORTATION

DIVISION OF CHIEF LEGAL COUNSEL & EQUAL OPPORTUNITY
1980 WEST BROAD STREET • COLUMBUS, OH 43223 • 614-466-3664
JOHN R. KASICH, GOVERNOR • JERRY WRAY, DIRECTOR

December 6, 2013

Randall J. Meyer
Inspector General
Office of the Inspector General
30 East Broad Street—Suite 2940
Columbus, OH 43215-3414

2013 DEC -9 PM 2:57
OFFICE OF
INSPECTOR GENERAL

RE: IG File 2013-CA-00020

Dear Inspector General Meyer:

Thank you for your comprehensive investigation of the actions of Debra Speakman, a former ODOT employee. ODOT would like to offer the following in response to the recommendations found in your report.

RECOMMENDATION 1: Review existing policies to require periodic supervisory review of staff use of the agency's computer systems, printers and fax machines

RESPONSE: The agency is undertaking a review of policies and existing software to monitor equipment usage, after reviewing existing protocols, changes may be implemented.

RECOMMENDATION 2: Develop an ODOT policy requiring all employees to report secondary employment, outside income, and propriety interests annually, in order to eliminate potential conflicts of interest.

RESPONSE: By the end of December, ODOT work rules will be changed to require all employees to report secondary employment. (See Attachment #1). Each employee will be required to complete a secondary employment form. (Attachment #2). This form will be sent from Human Resources (HR) and returned and maintained by the Division of Chief Legal & Equal Opportunity (CLC). CLC will conduct a conflicts check and advise the employee accordingly. The employee will be required to notify HR and CLC of any changes in secondary employment. Each year in conjunction with Fraud and Ethics training, each employee with secondary employment will be required to provide verification of that employment and have an additional opportunity to notify CLC of any changes. (Attachment #3). Additionally, each employee is obligated to report secondary employment to HR and CLC before acceptance of the secondary employment pursuant to our policy.

Inspector General Meyer
IG File 2013-CA-00020
December 6, 2013
Page 2

We trust that these changes are satisfactory to your office. If you have any concerns about our recommendations please advise us as soon as possible or we will presume that our plan meets the expectation set forth in Recommendation #2. Thank you for your time and attention to this matter.

Respectfully,



Jerry Wray
Director

cc: Greg Murphy, Chief of Staff
James A. Barna, Asst. Dir. for Policy/Chief Engineer
Michael C. Flynn, Asst. Dir. for Operations
David Coyle, Asst. Dir. for Business and Human Resources
Patrick J. Piccininni, Chief Legal Counsel
Nick Nicholson, Deputy Dir. for Human Resources
Samuel Porter, Asst. Legal Counsel, Office of the Governor

On December 16, 2013 ODOT will be adopting the below language into ODOT's Work Rules. Due to this change any employees that maintain outside employment will have to complete the attached form and return it to the Office of Chief Legal Counsel by December 31, 2013. Prior to you accepting secondary employment outside of ODOT, you must fill out the "Secondary Employment/Proprietary Interests" form, which is located on the Chief Legal Office sharepoint site. This form will be reviewed for possible conflicts of interests and maintained in the Chief Legal Office. Failure to follow this procedure may lead to discipline, up to and including removal.

OUTSIDE EMPLOYEMENT

No employee shall accept or engage in any employment, occupation, proprietary interest or business outside of ODOT if the activity interferes with the employee's job performance or attendance; is incompatible with the employee's job, or presents a conflict of interest or the appearance of a conflict of interest with the business of ODOT.

All employees are required to disclose any outside employment or proprietary interest using the attached form upon hire, or upon any change in outside employment status. This form will be maintained in the Chief Legal Counsel's Office.



OHIO DEPARTMENT OF TRANSPORTATION

Secondary Employment/Proprietary Interests Acknowledgment

I _____, In addition to my current employment at ODOT, hereby disclose the following secondary employer(s) where I am also working and earning wages.

Employer/Proprietary Interests: _____

Address: _____

Position Held: _____

Employer/Proprietary Interests: _____

Address: _____

Position Held: _____

Employer/Proprietary Interests: _____

Address: _____

Position Held: _____

Signature

Date



OHIO DEPARTMENT OF TRANSPORTATION

Secondary Employment/Proprietary Interests

Re-verification

You previously reported secondary employment and or a proprietary interest in a business.

1. Do you still hold secondary employment? Yes _____ No _____
2. Do you still hold a proprietary interest in a business? Yes _____ No _____

If yes, please identify any changes below.

Employer/Proprietary Interests: _____

Address: _____

Position Held: _____

Employer/Proprietary Interests: _____

Address: _____

Position Held: _____

Employer/Proprietary Interests: _____

Address: _____

Position Held: _____

*REVERIFICATION IS DUE ON 12/30 EACH CALENDAR YEAR.

Signature

Date