



Department of  
Job and Family Services

John R. Kasich, Governor  
Michael B. Colbert, Director

May 8, 2013

Mr. Randall J. Meyer  
Ohio Inspector General  
30 East Broad Street, Suite 2940  
Columbus, Ohio 43215

RE: *Ohio Commission on Fatherhood*, File Identification Number: 2011-092

Dear Inspector General Meyer:

Please take this letter as the Ohio Department of Job and Family Services' (ODJFS), Ohio Commission on Fatherhood's (OCF), formal response to the recommendations made by your office in the State of Ohio's Office of The Inspector General Investigative Report, entitled *Ohio Commission on Fatherhood*, and issued on March 12, 2013.

The Inspector General's Recommendations and ODJFS/OCF's Responses:

- 1) Obtain copies of the financial disclosure statements filed by all employees and review them for possible instances of outside employment. If the financial disclosure statement provides evidence of outside employment, ensure the employee's personnel file contains an approved "Notification of Outside Employment" form and confirm the employee's outside job duties do not interfere or conflict with any ODJFS work duties or interests.**

Your recommendation asks ODJFS to detail a plan for implementation of these recommendations. ODJFS has, however, already obtained financial disclosure forms from the 59 employees employed by ODJFS who have an annual obligation pursuant to O.R.C. 102.02 to file this form, and has cross-checked the information included on those forms that suggested that the employee might have additional employment outside ODJFS. Nine ODJFS employees identified outside employment on their latest financial disclosure forms. Of that group of nine, four employees did not have outside employment forms included in their personnel files. ODJFS had three employees to complete the requisite form, and subsequently verified that the outside employment they identified poses no conflict with the performance of their ODJFS job duties. ODJFS learned in a preliminary investigation that it was unnecessary for the fourth employee to complete outside employment forms because her outside employment actually pre-dated her employment with this agency.

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- 2) **Review the personnel records of the agency to confirm each employee has acknowledged review and receipt of the most recent editions of the ODJFS policy and procedures manuals, including any policy and procedure manuals specific to a division of ODJFS where employees might have additional requirements.**

Currently, ODJFS has approximately 80 employment-related policies on-line and accessible to all employees. Since summer 2011, ODJFS has had employees acknowledge ODJFS policies and procedures electronically. Initially, when an individual is hired to work for ODJFS, he or she must acknowledge ODJFS' policies. Then, as policies are updated, all ODJFS employees are asked to review the revised policies and re-acknowledge them.

Although ODJFS has not had its employees acknowledge IPP. 5003, Outside Employment since 2011, in the 2012 annual ethics training that ODJFS conducts, and that all employees must attend, the responsibility of employees to report outside employment was addressed. Additionally, ODJFS will be sending IPP. 5003 to employees in May 2013 for review and acknowledgment.

ODJFS believes that the efforts taken to date, and those it will pursue in the future, fully satisfy the recommendations that your office has made, but if there is any other step ODJFS should take, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads "Robert L. Ferguson". The signature is written in a cursive style with a large, stylized 'R' and 'F'.

Robert L. Ferguson  
Chief Inspector

cc: Sonnetta Sturkey, ODJFS Chief Operations Officer  
Michael McCreight, ODJFS Assistant Director  
Lewis George, ODJFS Chief Legal Counsel