

**OFFICE OF THE INSPECTOR GENERAL  
CITY OF BALTIMORE**



**Isabel Mercedes Cumming  
Inspector General**

**Investigative  
Report Synopsis**

**OIG Case # 20-0014-I**

**Issued: January 6, 2020**



OFFICE OF THE INSPECTOR GENERAL  
Isabel Mercedes Cumming, Inspector General  
City Hall, Suite 635  
100 N. Holliday Street  
Baltimore, MD 21202



January 6, 2020

Dear Citizens of Baltimore City,

The Office of the Inspector General (OIG) conducted an investigation regarding suspected ethics violations within the Office of Risk Management (Risk). The complaint alleged two Risk employees provided potentially confidential information pertaining to an upcoming City of Baltimore request for proposal (RFP) relating to workers' compensation claims administration services.

The mission of the OIG is to promote accountability, efficiency, and integrity in City government, as well as the investigation of complaints of fraud, financial waste, and abuse in City government. The OIG investigation revealed that one Risk employee (Employee One) sent or forwarded confidential information via email to an employee of the incumbent vendor, (Vendor), that consisted of confidential internal discussions about the City of Baltimore's upcoming 2020 RFP. In other e-mails, Employee One referenced his friendship with one of the Vendor's employees by using terms of endearment on multiple occasions. Employee One emailed other of the Vendor's employees and also referenced his close relationship with them on numerous emails.

The OIG also learned that both Risk employees forwarded e-mails to unauthorized individuals containing confidential workers' compensation information concerning two different City of Baltimore employees. One of the unauthorized e-mails was sent to a City of Baltimore employee who does not work in Risk; the second e-mail was sent to someone outside of City Government. Both e-mails contained possible personal identifying information of the employees involved and descriptions of the incidents that took place. According to the Health Insurance Portability and Accountability Act's (HIPAA) Privacy Rule, "individually identifiable health information is protected information."

Moreover, the OIG found the other Risk employee (Employee Two) forwarded other emails to the Vendor outlining confidential internal City agency concerns about a contract. In one email, there was a discussion about the release date of the RFP and how to handle the concerns raised by an internal City agency. Employee One and Employee Two continued discussions regarding the same topic on other platforms as well, such as text messaging and web-based email accounts. Furthermore, Employee Two accepted two Baltimore Ravens tickets from the Vendor employee for a discounted price of \$25 each.

It was learned that after the departure of Employee One from City employment, Employee Two continued to communicate with Employee One about confidential and sensitive RISK procurement needs.

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The OIG found the employees violated the Baltimore City Ethics Code by using their positions to obtain confidential information and disclosing the information to a Vendor which could potentially result in an unfair competitive advantage and corruption of the City's bidding processes. In addition, the employees accepted gifts that they falsely valued far below their actual retail value and then failed to disclose them on their ethics reports. Finally, the employees participated in behavior that may have violated HIPAA privacy laws.

Both employees are no longer employed by the City of Baltimore. The employee at the Vendor was terminated as well.

Sincerely,



Isabel Mercedes Cumming, Inspector General  
Office of the Inspector General

Cc: Hon. Bernard C. "Jack" Young, Mayor of Baltimore City  
Hon. Brandon Scott, President, City Council  
Hon. Joan M. Pratt, Baltimore City Comptroller  
Honorable Members of the Baltimore City Council  
Hon. Andre M. Davis, City Solicitor

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