Integrity Ops Guide

Proposed founding guide for discussion. Minnesota Statutes chapter 15E supplies the authority. This guide proposes how the office would exercise it. Confirm effective dates and applicable agreements before adoption.

Contents

01 · Proposed org chart · 14 FTE

02 · Mandate and operating model

03 · Accept, route or close

04 · Independence and political pressure

05 · Counsel, technology and quality control

06 · Escalate urgent risk

07 · Refer suspected criminal conduct

08 · Report, verify and learn

09 · Briefs and advisory for member offices

10 · Legislative requests and IG-initiated work

01 · Proposed org chart · 14 FTE

Planning structure for the core office. Staffing and reporting lines are proposed.

Inspector General (1)		
Counsel (1)	Security and data integrity lead (1)	**Operations lead (1)**
Teams reporting to Operations		
Intake and case operations (1)	Community engagement and communications (1)	Investigations and fieldwork (2)
Payment and data integrity (3)	Standards and follow-through (2)	Insight and foresight (1)

Explore staffing and costs →

02 · Mandate and operating model

Protect public resources. Use independent inspections, evaluations and investigations to identify fraud or misuse and recommend changes that prevent recurrence. Coordinate across agencies, set standards for agency IGs and evaluate their performance. Respect the Legislative Auditor’s independent authority.

Put people on the work. The IG owns decisions, with counsel advising on legal authority and safeguards. Intake screens and routes reports. Investigators establish facts and causes. Payment and data specialists test risk signals. Standards staff verify fixes. Foresight spots emerging patterns. Permanent security leadership governs access and evidence integrity.

Make the work visible. The core engagement and communications lead owns community listening, events, outreach, social channels and the proposed podcast. Intake owns secure case records. Use myOIG to

guide residents to secure intake and give them access to published findings, agency resources and recommendation updates. Route tips from public channels to secure intake. Publish cleared findings and verified outcomes.

03 · Accept, route or close

Public authority, written reasons. Each engagement is a decision about how to exercise public authority. The same written criteria apply to public tips, agency and legislative requests, technology flags and work the office initiates. Acknowledgment starts screening. It promises neither an investigation nor a particular outcome.

1. **Register and protect.** Assign a matter ID, document the source and facts separately, check for immediate harm or evidence loss, classify the data and run a conflict check before broad access. Offer anonymous phone and web reporting. Preserve the original record and limit collection to what the review needs.

2. **Establish authority and the right lead.** Identify the program, legal basis, effective date, jurisdictional limits, applicable federal conditions and any primary or concurrent authority. Check for overlapping work with the Legislative Auditor, agency IG or enforcement partner through authorized channels. Make required referrals independently of the decision to open. Under § 15E.25, subd. 2(g), refer credible public reports of potential fraud or misuse to the Legislative Auditor and Medicaid reports also to the DHS commissioner.

3. **Prioritize on facts.** Weigh specificity, corroboration, potential public loss or service harm, time sensitivity, systemic reach, and the office's ability to add value. Record what is known and what still needs testing. An anonymous source can provide credible evidence. Party, office, headlines and election calendars do not determine priority. Record resource limits honestly.

4. **Choose and authorize the disposition.** Open, coordinate, refer, seek information, defer or decline with a reason and an owner. For investigative work, name the approving official, legal authority, scope, evidence plan, safeguards and review point. The IG or authorized delegate signs the decision. Escalate disputed authority, coercive steps, conflicts and attempted interference to counsel and the IG before proceeding, subject to lawful urgent preservation and required referrals.

5. **Recheck when facts change.** Record secure handoffs and confirm receipt. Review deferred matters on the assigned date. Document and approve material scope changes, reopening or closure. Capture the reason and referral data needed for the § 15E.50 summary while the decision is fresh.

04 · Independence and political pressure

Keep decision rights inside the office. Under § 15E.10, the IG reports directly to the governor and exercises the office's powers independently. Executive or legislative actors cannot direct or interfere with that work except as enacted law directs. Accept leads and questions through established channels. Outside officials, funders and requesters get no approval right over case selection, scope, findings or release.

Log and escalate attempted interference. Preserve any pressure to open, drop, accelerate, delay, leak or rewrite work. Record the contact, request, timing and response in a restricted log. Notify counsel and the IG promptly. Maintain the documented schedule unless a lawful, recorded operational reason warrants a change. If the IG or counsel is implicated, use a predesignated, legally authorized alternate or external channel and exclude the conflicted official from the decision.

Screen for actual and apparent conflicts. Check financial, personal, political and prior-work ties at intake, staffing and scope changes. Record the safeguard, recusal or reassignment, block case access where needed and assign a disinterested reviewer. Advisory staff should not independently verify their own work. If safeguards cannot protect impartiality, find a lawful alternate lead and honor any mandatory referral.

Serve both sides under one policy. Apply the same scope, priority and access rules to member offices. Define the public purpose, data limits and deliverable before accepting advisory work. Decline campaign

work, requests for privileged access and assignments seeking a predetermined result. Apply the same release criteria and approved briefing rules across parties. Keep referrals and lawful confidential communications available.

05 · Counsel, technology and quality control

Counsel maintains the legal controls. Counsel advises the IG, owns the authority and referral matrix, and maintains conflict, recusal, data-sharing, evidence, notice, response and release protocols. Counsel reviews high-risk decisions before coercive process, payment intervention, protected-data disclosure or publication. Investigators own the factual record and the IG owns the disposition. Record legal clearance and decision rationale with access controls that protect privileged advice where applicable.

Automate the record, keep judgment human. Enable required fields, role-based access, screening prompts, routing reminders and tamper-evident decision logs. Analytics and AI may flag patterns or help organize authorized material. They do not decide credibility, open or close a case, or trigger an adverse action. Log model version, data source, reviewer and overrides. Test for repeat false positives and uneven treatment. Use approved environments and keep protected data out of unapproved tools.

Keep the controls current. As a proposed practice, counsel and operations review the authority matrix when laws, agreements or material risks change. Quarterly, quality staff sample acceptances, deferrals, denials, referrals and overrides for consistency, missed deadlines and deviations from published criteria. Log corrections, owners and due dates. Follow § 15E.55 professional standards and support the required external reviews.

06 · Escalate urgent risk

Act promptly. Immediate danger goes to 911. For ongoing loss, evidence at risk, retaliation concerns or suspected criminal conduct, alert the duty lead and counsel promptly. Preserve records and restrict access.

Review protective action. The IG and counsel assess statutory thresholds, agency primary authority, effective dates, federal requirements, and notice or due process. Use authorized agency notification, recommendations or court processes for payment intervention. Document the decision and service continuity measures.

07 · Refer suspected criminal conduct

Choose the receiving authority. The IG or delegate coordinates with counsel and routes suspected criminal matters to the authority with jurisdiction. Examples include BCA or local law enforcement, the Attorney General's Medicaid Fraud Control Unit for appropriate provider fraud matters, and federal partners for federal programs. Match civil and administrative matters to the appropriate authority.

Preserve the handoff. Record facts and uncertainties, the legal basis for disclosure, evidence provenance, the approved secure transfer, recipient and next steps. Confirm receipt and agree how parallel work will proceed without compromising the investigation. The receiving authority decides its next action.

Keep powers distinct. The proposed operating core uses existing referral partners. Chapter 15E permits establishing a separate sworn bureau beginning January 1, 2028. Keep administrative and sworn authorities distinct.

08 · Report, verify and learn

Clear the record for release. Issue public reports on completed investigations and corrective actions, subject to lawful data classification and disclosure review. Publish the annual office report and submit it to LIGAC. Starting December 1, 2027, submit the required annual summary on matters unopened or no longer actively pursued to the Legislative Auditor and designated legislative committee leaders.

Track each fix. Record the action, agency owner, due date and evidence of implementation. Independently test whether the fix works. Publish cleared results with actual recoveries distinguished from estimated prevention. Use recurring causes and emerging risks to improve guidance, controls and future reviews.

09 · Briefs and advisory for member offices

Modeled on GAO's short-form defense quick looks and budget justification reviews. The products below are proposed for Minnesota's oversight and budget cycle.

• **Annual Integrity Quick Look.** A short, source-linked brief on what prior oversight found, what remains unverified, and which lead warrants a closer look.

• **How a Quick Look becomes a review.** Start with open findings, agency IG reports, prior audits, and corrective-action records. Use approved AI tools to group findings and flag recurring control failures. Auditors, analysts, investigators, and counsel check the underlying sources, remove duplicates, and verify status and jurisdiction. Rank leads by dollars at risk, harm to residents, evidence strength, lawful access, and existing work. Record why the lead was selected. Scope the review to the program, payment stream, provider, or transaction pattern the evidence supports. Corroborate an individual's role before taking action.

• **Illustrative member brief.** Prior reports flag weak proof of service. The agency reports a fix, and testing of the fix remains open. The proposed next step is to trace a sample of payments from authorization to service delivery. The brief identifies the source reports, responsible agency, evidence still needed, and decision on whether to expand the review.

• **Budget Justification Review.** A short review of selected funding requests. See the cost drivers, oversight capacity, control assumptions and questions to resolve before committing funds.

• **Member Office Advisory.** Request a tailored briefing or evidence review on a budget, hearing or oversight question within the OIG mandate. Apply consistent, nonpartisan intake criteria and protect confidential matters.

Service commitments

• **Accessible.** Mobile-first HTML with plain language, screen-reader structure and a printable version.

• **Reliable.** Show sources, dates, scope, confidence and corrections. Distinguish verified results from estimates.

• **Responsive.** Proposed target: acknowledge within two business days, name a point of contact and agree on a delivery date or referral.

10 · Legislative requests and IG-initiated work

One written intake route. Accept requests from committees, subcommittees, chairs, ranking minority members, chamber leaders and individual members. Designated staff may submit for a member or committee. Confirm oral requests in writing. Record the requester and capacity, committee jurisdiction, question, public purpose, requested product, decision deadline and relevant records. Route sensitive details through a secure channel.

Screen before committing. Operations logs and acknowledges the request. Counsel checks authority, conflicts, confidentiality and overlap with the Legislative Auditor or agency work. The IG or authorized delegate decides whether to accept, narrow, defer, refer or decline. Record why, who approved it and when it will be revisited. If accepted, confirm scope, product, owner, timing and update schedule with the requester.

Order of consideration. Meet duties and deadlines imposed by enacted law first. For discretionary member requests, give first consideration to committees of jurisdiction and their chairs and ranking minority members on equal terms, and to chamber leadership on both sides. Next consider requests from other members of committees of jurisdiction, then other individual members. Within each tier weigh urgency,

public harm, decision timing and available capacity. Record any departure from the order and the reason.

Reserve capacity for IG-initiated work. The IG may open or reprioritize work within statutory authority without a legislative request or approval. Use objective triggers such as urgent ethics concerns, credible threats to public funds or services, and emerging patterns across programs. For a politically charged question, identify a specific oversight issue and record the authority, evidence and public purpose. Apply the same conflict and documentation checks to self-initiated work.

Keep control of the work and its release. A priority tier governs scheduling. The requester has no approval right over scope, findings or release. Keep a restricted decision log covering disposition, reasons, milestones, changes and delivery. Review the queue regularly for inconsistent handling across parties or chambers and publish legally cleared aggregate activity where appropriate.

References. GAO Congressional Protocols inform the proposed intake design. Minnesota's independence provision (§ 15E.10) and powers and duties (§ 15E.25) govern the office.

Minnesota statutory references · § 15E.10 · § 15E.25 · § 15E.27 · § 15E.40 · § 15E.50 · § 15E.55