

**Office of Integrity and Compliance**  
**Frank Turner II, Integrity & Compliance Officer**  
*Wayne K. Curry Administration Building, Suite 3-124*  
*1301 McCormick Dr., Largo, MD 20774*

December 5, 2024

**TO:** Prince George's County House Delegation

**RE:** **Opposition to PG 504-25**

As the inaugural Integrity and Compliance Officer (ICO) for the PGCPS Office of Integrity and Compliance (OIC), I present this letter to express my opposition to PG 504-25. The proposed amendments to §4-404 of the Education Article of the Annotated Code of Maryland include overhauling the appointment process, authority, responsibilities, and essentially erasing the independent role of the ICO, and as well as revamping the purpose of the OIC.

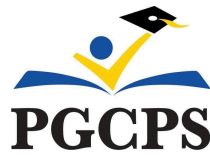
The OIC was created by Maryland law on July 1, 2023, and I was appointed on January 16, 2024, with my first day at the job on January 29, 2024. I proudly accepted this opportunity to establish and lead this new PGCPS transformational office charged with improving and preserving the school system's reputation while ensuring public accountability and compliance. Nonetheless, since I started building the office from the ground up, I have encountered many unanticipated challenges, which have significantly impacted the day-to-day operations of the OIC.

For example, the OIC has experienced:

- (1) a lack of support from PGCPS leadership and some school board elected officials, who do not accept or at a minimum resist understanding the independent nature of this office;
- (2) interference by PGCPS leadership and some school board elected officials on the coordination and investigative efforts to accomplish the statutory duties of this office;
- (3) opposition to acknowledge and include the existence of the OIC in PGCPS policies and procedures to properly educate the PGCPS community on our roles and responsibilities within the school system; and
- (4) resistance to execute a contract to bring investigative resources in support of the OIC's mission.

After patiently working with PGCPS leadership last Spring, my first staff member started approximately six months ago in the last week of June 2024 and my newest OIC team member, my sole investigator, reported last week (December 2, 2024). The OIC is now staffed with a "small, but mighty team" as I refer to them, of four (4) individuals, as well as me. Naturally, some new office set up challenges were foreseeable, while others were avoidable, as a result of the school system conforming to a new independent office. As you know, the office has functions, powers, and duties similar to those of an Inspector General (IG). The current budgetary cost of the new OIC office equates to 0.0005% or five ten-thousandths of one percent of the overall PGCPS budget.

To assist with PGCPS' adjustment to having the OIC, my office is continuously identifying, pursuing, and taking advantage of opportunities to provide awareness of the OIC's mission, duties, and independent role within the school system. In addition, I have been fortunate to meet several IGs and external PGCPS stakeholders, who have shared best practices while emphasizing that the office must always remain independent both in fact and in appearance. My team and I continue to learn, evaluate, and improve the



## Office of Integrity and Compliance

**Frank Turner II, Integrity & Compliance Officer**  
*Wayne K. Curry Administration Building, Suite 3-124*  
*1301 McCormick Dr., Largo, MD 20774*

December 5, 2024

effectiveness of PGCPS programs, policies, and operations while performing our statutory duties. Also, our efforts have required strategic prioritization and the balancing of reactive versus proactive work while perfecting our public facing work plan. As I will celebrate my one year anniversary as the inaugural ICO at the end of January 2025, I look forward to the PGCPS leadership and the Board of Education supporting, collaborating, and providing input on establishing system risk areas, emerging trends, and priorities pursuant to the mission of the OIC.

In summary, having a solid infrastructure - which is dependent on PGCPS - is crucial to demonstrate growth and the impact of my office. The office was created from scratch less than a year ago to serve as an independent inspection office over one of the nation's largest public school systems that started 125 years ago. At this time, it would be extremely premature for the Prince George's County House Delegation to consider any law amendments affecting the formation, foundation, or continued build out of this brand new office. It would also further slow the development and productivity of the new office by adding unnecessary bureaucratic parameters. Furthermore, PGCPS is still in the process of learning, adapting, and accepting the independent nature of the OIC's authority as different matters arise in the normal course of business. Due to these organizational acclimatization and the critical role OIC has within the school system, I recommend to postpone for at least two (2) years any substantial considerations of the proposed amendments introduced by PG 504-25 and/or any other future amendments.

Lastly, I would like the opportunity to present the proposed changes to the office first for your consideration as the inaugural leader of the office before other entities attempt to control how this office operates. Postponing any alterations to the law will also provide ample time for the Prince George's County House Delegation to evaluate and analyze the OIC's operations in conjunction with any imperfections of the law, resulting from future circumstances that may emerge over time.

Sincerely,

*Frank S. Turner II*

Frank S. Turner II  
Integrity and Compliance Officer (ICO)  
PGCPS Office of Integrity and Compliance (OIC)