



OFFICE OF THE INSPECTOR GENERAL
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June 11, 2025

Office of the Inspector General Response

The Office of the Inspector General is responding to the response provided on May 28, 2025, by the Mayor's Office of Neighborhood Safety and Engagement (MONSE) Director Stefanie Mavronis (Director Mavronis) and Interim Baltimore City Health Department (BCHD) Commissioner Mary Beth Haller.

The OIG wishes to clarify that MPIA is separate from record retention. The OIG regrets the error and has corrected it in the public synopsis. In regard to record retention, the OIG cited Administrative Manual policies that are still available on the City website¹ but acknowledges that the City Code Article 1, Subtitle 10, is the governing law.

The City pays for Microsoft Teams, which is the City-wide messaging and collaboration tool that is available on City equipment. City-wide usage of Microsoft Teams began in 2020. Director Mavronis acknowledges that MONSE has used Slack as a communication tool since July 2021 and pays for it with City funds. The OIG reviewed correspondence from the former MONSE Director, reminding another MONSE employee that all internal correspondence between MONSE team members should be sent in Slack to reduce "email overhead." City funds paid for MONSE's Slack software, and all MONSE Slack messages fall under the MPIA with limited exceptions, such as those based on other sources of law, personnel records, arrest records, and other miscellaneous exceptions. Overall, Slack records are electronic communications involving City Business.

Giving the public the right to access government records is the foundation of MPIA. The OIG reviewed an MPIA for MONSE that requested "all electronic communications" and another that expressly requested "slack communications". In response to both MPIAs, the City did not provide any Slack communications, which gives concern if a Slack search was conducted.

MONSE provided the requested Slack messages during the investigation after the OIG was asked to provide a subpoena for the information. The OIG was encouraged to learn from Director Mavronis' response that MONSE's Slack has an indefinite retention of messages.

The OIG remains clear in recommending that rather than agencies having siloed third-party communication platforms, the agencies should be required to notify BCIT and the Law Department (Law) of all communication methods used throughout the City for their awareness and insight into best practices and management. The OIG understands that the responsibility for MPIA compliance may fall with the agency or specific employee mentioned in the request, but informing BCIT and Law of all communication platforms each agency uses would assist with responsiveness to MPIA requests.

The OIG noted in the report that BCIT asked MONSE why the Slack membership was needed for MONSE's business needs and if the City's communication platforms were not meeting MONSE's needs. A MONSE Associate Director (MONSE AD) replied it was for the MONSE to collaborate with

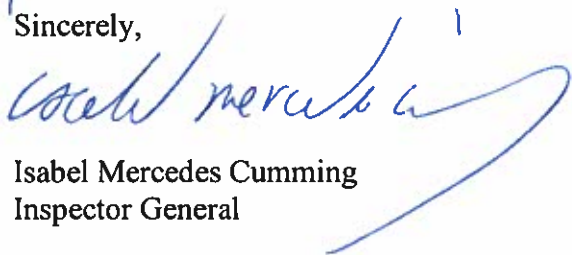
¹ https://bbmr.baltimorecity.gov/administrative-manual?term_node_tid_depth=All&combine=records

community members and that Microsoft Teams does not allow MONSE to invite people outside the City to collaborate. The MONSE AD later told the OIG that Slack was only used for *internal* MONSE communication, not with people outside MONSE. MONSE's provided reason to BCIT for this software was not factual.

The OIG determined that BCIT does not manage MONSE's Slack subscription plan. MONSE's selected plan has fewer security and data compliance capabilities than Slack's higher-tiered subscription plans. MONSE's current subscription plan does not include audit logs, data loss prevention, legal holds, data exports for all messages, or support for HIPAA compliance² as shown in the chart found in the public synopsis. Furthermore, some BCHD employees utilized the free subscription with has less security protections and retention, and no support for HIPAA compliance according to Slack's website.

The OIG reiterates that City agencies should be required to receive BCIT approval to use third-party communication platforms such as Slack, WhatsApp, and Signal. BCIT should then configure the requesting agency's access to those platforms for best practices. Moreover, Law should then be informed of third-party communication usage to ensure effective responses to MPIA requests and increased awareness of City messages that could become subject to litigation holds for government communications.

Sincerely,



Isabel Mercedes Cumming
Inspector General

Exhibits

CC: Hon. Brandon M. Scott, Mayor of Baltimore City
Hon. Zeke Cohen, Baltimore City Council President
Hon. Bill Henry, Baltimore City Comptroller
Honorable Members of the Baltimore City Council
Hon. Ebony Thompson, Baltimore City Solicitor
Faith P. Leach, Chief Administrative Officer
Stefanie Mavronis, MONSE Director
Mary Beth Haller, Interim Baltimore City Health Commissioner
Leyla Laymen, Interim BCIT Director

² <https://www.hhs.gov/sites/default/files/privacysummary.pdf>