



CITY OF BALTIMORE
MAYOR BRANDON M. SCOTT

MEMORANDUM

TO	Isabel Mercedes Cumming, Inspector General
FROM	Stefanie Mavronis, Director, MONSE Mary Beth Haller, Interim Health Commissioner, BCHD
DATE	Wednesday, May 28, 2025
SUBJECT	Management Alert #25-0013-I

This memorandum serves as an official joint response to OIG Management Alert #25-0013-I.

Both the Baltimore City Health Department (BCHD) and the Mayor's Office of Neighborhood Safety and Engagement (MONSE) use or have used Slack as their third-party communication tool. The City of Baltimore allows the use of third-party communication software to support agency service delivery. While Microsoft Teams is the primary software used for internal communications, the City has not prohibited the use or selection of other third-party communication software. However, the City implemented a policy that any third-party software to be procured and used other than Microsoft Teams must be vetted and approved by Baltimore City Information and Technology (BCIT).

BCHD

During the COVID-19 pandemic and prior to the City's transition to Microsoft Teams, BCHD used Slack as a communication and collaboration tool. Since the City's transition to Microsoft Teams, BCHD's use of Slack has waned. BCHD leadership inquired about the use of third-party communication tools with internal staff to determine the usage of Slack and learned that some staff still utilize the free version of Slack for internal communications. While BCHD has not violated any city policy regarding the use of third-party communication software, the following policy reminder was sent to BCHD leadership and staff on May 2, 2025 and May 7, 2025 respectively:

This is a reminder that the use of any applications, Artificial Intelligence (AI) programs, or technology in your work as a City employee MUST be specifically approved by the BCHD IT department and/or BCIT prior to its use. Only City approved technology and applications are permitted. If you are using

any technology, AI programs, or applications that have not been specifically provided by or approved by the City, the use of that technology, AI program, or application must cease immediately. If you believe there is available technology, AI, or applications necessary for your work it should be submitted for approval.

MONSE

In accordance with City policy, MONSE requested and received approval from BCIT to use Slack as a communication and collaboration tool. Staff transitions have occurred over the last several years since MONSE began using Slack. Current staff were unaware of the requirement to obtain approval annually from BCIT for continued use of third-party software such as Slack, particularly because monthly P-card charges for Slack fees continued to be processed without incident. However, moving forward MONSE will ensure it receives approval annually as required.

MONSE initially procured Slack in July 2021 and has expended about \$4,000 per year on the software through December 2024. The agency does not hold a contract with Slack and instead pays a per-user monthly subscription cost, which fluctuates depending on the number of staff added. The agency's roster of Slack users includes every member of the MONSE full-time staff, the agency's interns, and one contracted technical assistance provider associated with the Group Violence Reduction Strategy. To implement internal controls, the GVRS technical assistance provider has limited access to GVRS-related channels and conversations, and team members are added to the Slack platform using their verified City of Baltimore logins.

From its customization to suit core agency functions to the indefinite retention of messages transmitted, Slack has proven to have value for MONSE as a collaboration tool.

Communications about public business on the Slack platform constitute government records and are subject to the Maryland Public Information Act (MPIA) just like other electronic records, including emails and Microsoft Teams messages. MONSE's paid Slack Pro account retains messages and files transmitted indefinitely. In fact, the Office of the Inspector General requested 6-months of MONSE communication. Those electronic records, totaling tens of thousands of transmitted communications, were exported and provided in full as requested. Accordingly, MONSE has demonstrated the ability to retain and produce records on third-party software other than Microsoft Teams.

In addition, Subtitle 10 of Article 1 of the City Code, enacted in 2020, currently governs City records management and has supplanted the 2004 Administrative Manual provisions referenced in Exhibit 14. The former Solicitor's memo in Exhibit 15 cites to these Code provisions and the current state laws that govern records management instead of the Administrative Manual as it is

no longer current. The MPIA is not cited in this memo because it does not govern records retention at all. The state's MPIA Compliance Board has repeatedly explained to those seeking records that the MPIA does not govern record retention and is not a mechanism to address record keeping. See, e.g., PIACB 25-28, p. 4; PIACB 24-10, p. 7 (MPIA is "not charged with evaluating the sufficiency or efficiency of an agency's record-keeping practices."). We thus respectfully disagree that MONSE has in any way violated the MPIA through its use of Slack.

Conclusion

Neither BCHD or MONSE have intentions or a practice of using Slack to circumvent records retention or MPIA requirements. Additionally, agency staff utilizing the tool for communication purposes understand that their correspondence is official government communication subject to the MPIA. While we believe this communication and collaboration tool has value, we will comply with any official changes in directives governing agency communications. We also continue to stand ready to comply with any directives made in accordance with City and state records retention laws.

Thank you for the opportunity to provide a response. Please do not hesitate to contact us with any follow-up questions.

Cc: Brandon M. Scott, Mayor
Ebony M. Thompson, City Solicitor
Faith Leach, Chief Administrative Officer
Shamiah Kerney, Deputy Chief Administrative Officer
Leyla Layman, Interim BCIT Chief Information Officer