



TERRITORIAL AUDIT OFFICE
AMERICAN SAMOA GOVERNMENT
2nd Floor, Tedi of Samoa Building
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August 15, 2024

Honorable Lemanu P.S. Mauga
Governor of American Samoa
American Samoa Government
Utelei, AS 96799

Talofa Governor Lemanu,

Enclosed is the Territorial Audit Office's first Ethical Climate Survey (survey), which measures the degree to which ethical standards influence organizational and individual decision-making. The survey, which was created by the Institute of Local Government, was distributed to all ASG employees in February 2024. Each employee was asked to answer 20 survey questions. The first 10 questions gauge opinions and perceptions about the employees own ethics and the other 10 questions gauge opinions and perceptions about the employees' supervisors and/or managers. Over 1,000 employees completed the survey.

Overall, the ethical climate score was **"High"**, a total average score of 168 out of 200 points. This score represents the sum of the average score for all 20 questions in the two surveys. The respondents scored their own ethics at 85 out of 100 and 83 out of 100 for the ethics of their managers and supervisors. The Institute for Local Government considers a score between 150 and 200 as a "High" score.

Although the overall responses were "High", the respondents' rated some questions lower in both surveys. These questions were around how employees feel about speaking up or reporting questionable practices and behaviors and feeling safe and supported by co-workers and trusted confidantes. Additionally, a "Medium" score response was identified in the supervisory survey specifically highlighting a potential issue with elected officials extending their policy and oversight roles into the day-to-day operations of government departments and agencies. Other "High" scores but lower than scores for other questions were questions on whether their supervisor/managers appoint and reward people based on their performance and that they refuse to accept gifts, and/or special treatment from those doing business with the department.

As shown in Appendix B, the Institute of Local Government recommends actions for governments to take to promote and maintain an ethical climate. These recommendations include:

- Incorporating ethics into the hiring and evaluation process for staff
- Conducting regular ethics-related learning opportunities, including examples of ethical dilemmas and ways to resolve them
- Going through specific items on the assessment to identify further opportunities for positive changes
- Reinforcing the importance of ethical considerations in agency behaviors and decisions



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For areas needing some improvement, the Institute of Local Government, recommends the following:

- Evaluating the areas of weakness indicated by the questionnaire and considering targeted remedial actions
- Analyzing the messages that staff and others receive and send about ethics
- Reviewing the agency's policies, including the criteria by which staff are evaluated
- Considering whether having a code of ethics would be helpful for the agency

We endorse these recommendations and suggest that department directors work with their ethics officers to take appropriate steps to maintain and improve the ethics of their departments.

I also want to acknowledge the audit staff, Morina Faasisila, IT Auditor, Manuia Satele, Auditor III, and Amataga Aloj, Auditor II, for their excellent work on this project

Respectfully submitted,

Mike Edmonds
Territorial Auditor

cc: Honorable La' apui Talauega Elasalo Va'alele Ale, Lieutenant Governor
Tuaolo Manaia Fruean, Senate President
Savali Talavou, Speaker of the House of Representatives

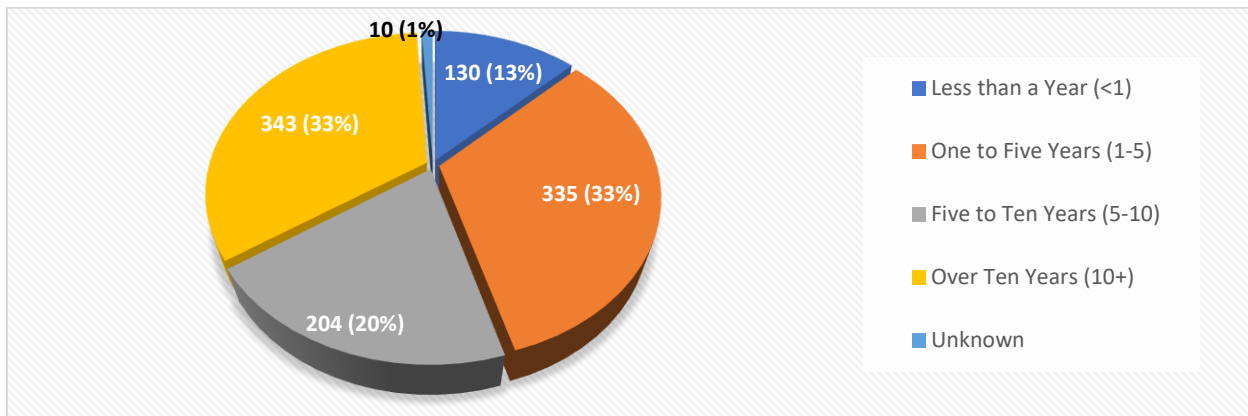
GOVERNMENT-WIDE SURVEY PARTICIPANTS & RESULTS

Participation in the survey was voluntary and anonymous. A total of 1,022 responses were received on opinions about employee's individual ethics and 347 responses on their opinions on the ethics of their supervisor/manager¹.

Number of Survey Participants by Years of Service with ASG

The respondents were asked how long they worked for ASG and were given the following five options: 1) Less than 1 year, 2) 1 to 5 years, 3) 5-10 years, 4) Over 10 years, and 5) unknown. The results are shown in Exhibit 1 below.

Exhibit 1
Survey Participants by Years of Service with ASG



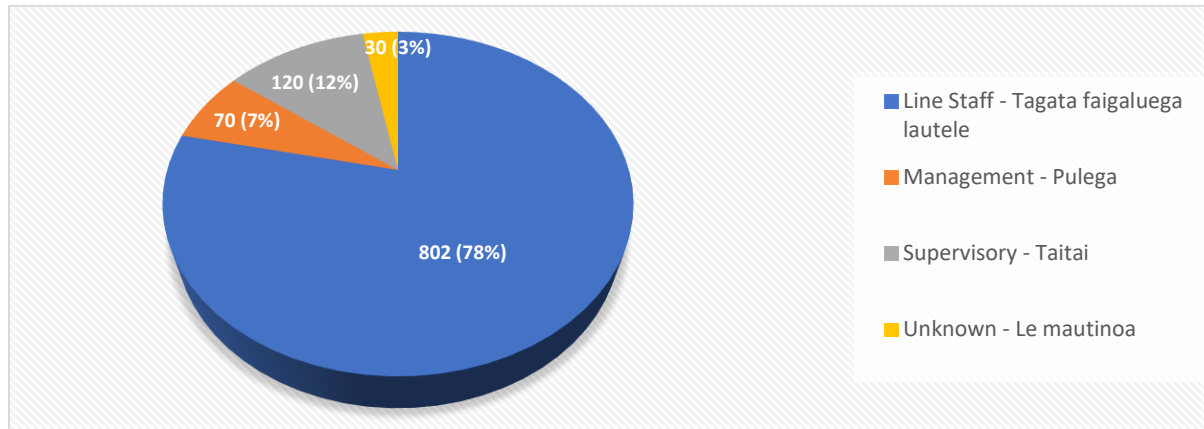
As Exhibit 1 above shows the 1,022 respondents' years of service with ASG. As Exhibit 1 shows, 13 percent of the respondents reported working for ASG for less than one year, 33 percent reported working for ASG for 1-5 years, 20 percent reported working for ASG for 5-10 years, 33 percent reported working for ASG for more than 10 years, and 1 percent did not answer how many years they have worked for ASG.

¹ The TAO received 1,022 responses on the employee's own ethics but only 347 responses about their supervisors or managers ethics. The surveys were in two separate documents. Respondents needed to answer the questions about their own ethics on one document and then open the other document and answer the questions about their manager/supervisor. Respondents may have found this confusing and didn't answer the questions about their manager/supervisor. We do not know exactly why only 347 employees answered the questions about their manager/supervisor. For future surveys, we plan to only use one document to minimize the confusion.

Survey Respondents by Staffing Role

Survey respondents were also asked about their role, or position in ASG. Respondents were given the following four choices: 1) Line staff, 2) Supervisory, 3) Management, and 4) Unknown. The results are shown in Exhibit 2 below.

Exhibit 2
Survey Respondents by Staffing Role



As Exhibit 2 above shows 1,022 respondents' role with ASG. As Exhibit 2 above shows, 78 percent of the respondents reported themselves as Line staff, 12 percent reported themselves as Supervisory, 7 percent reported themselves as Management, and 3 percent did not report their role.

Overall Survey Results

The results of ASG's first Ethical Climate Survey are as follows:

- **High Ethical Score results.** Overall, survey participants ethical climate score was "High", a total average score of 168 out of 200 points. This score represents the sum of the average score for all 20 questions in the two surveys. The respondents scored their own ethics at 85 out of 100 and 83 out of 100 for the ethics of their managers and supervisors. In adopting, the Institute for Local Government methodology, a score between 150 and 200 is categorized as a "High" score. Appendix B outlines some of the tasks government departments and agency can consider to ensure that it continues to maintain and promote strong ethical environments.
- **Although the overall responses were "High", the respondents' rated some questions lower in both surveys.** These questions were around how employees feel about speaking up or reporting questionable practices and behaviors and feeling safe and supported by co-

workers and trusted confidantes. Additionally, a “Medium” score response was identified in the supervisory survey specifically highlighting a potential issue with elected officials extending their policy and oversight roles into the day-to-day operations of government departments and agencies. Other “High” scores but lower than scores for other questions were questions on whether their supervisor/managers appoint and reward people based on their performance and that they refuse to accept gifts, and/or special treatment from those doing business with the department.

- **Employees’ perceptions of their own ethics were similar to their perceptions of the ethics of management and supervisors.** Participants of all levels scored their own ethics similar to the same level as their supervisors and managers. The respondents’ score for their own ethics was 85 and rated their supervisors/managers ethics at 83.
- **Employees’ opinions differ across staff roles and years of service with the organization.** Participants who identified themselves as “Management” scored the ASG’s ethical climate higher than those in other roles. Additionally, employees who reported working for the ASG less than a year and between one to five years gave higher scores than those with more years of experience.

The following sections provide more details on the results of the 2024 Ethical Climate Survey.

SURVEY 1: Employees Statements About Their Own Ethics

Exhibit 3 below shows the statements used in the employee survey about their own ethics, the average point score for each statement, and the ethical climate score for each question, as well as the total score for this survey.

Exhibit 3
Statements, Average Point Scores, and Ethical Climate
Scores for Employees Perceptions About Their Own Ethics

At the American Samoa Government, I AM.....	Average Point Score	Ethical Climate Score
1. Encouraged to speak up about any agency practices and policies that are ethically questionable	7.88	High
2. Expected to report questionable ethical behaviors of others	7.58	High
3. Clear about where to turn to for advice about ethical issues	8.06	High
4. Expected to follow the spirit and principle of the law in my work as a public servant	9.10	High
5. Expected to behave ethically in the execution of my duties	9.23	High
6. Expected to tell and speak the truth in my work for the government	9.16	High
7. Expected to treat everyone who comes before our department/agency equally, regardless of personal or political connections	8.99	High
8. Expected to follow government policies, rules and procedures and not the desires of senior officials	8.80	High
9. Surrounded by coworkers who know the difference between ethical and unethical behaviors and seem to care about the difference	7.83	High
10. Working with one or more trusted confidantes with whom I can discuss ethical dilemmas at work	7.88	High
Total Average Score for all 10 questions	85	High

Note: (High = 7.5 – 10, Medium = 5.0 – 7.4, Low 0 – 4.99)

As Exhibit 3 above shows, participants scored their own ethics at **85**, reflecting a “High” ethics score. The scores across all 10 questions suggest perceptions of ‘High’ ethics. The highest scores were for the questions about whether that they expected to behave ethically in the execution of their duties (9.23), whether they are expected to tell and speak the truth in their work for the government (9.16), and whether they are expected to follow the spirit and principle of the law in their work as public servants (9.10).

Although respondents’ scores for all 10 questions had an ethical climate score of “High”, the respondents’ scores were lower for several questions, indicating room for improvement. The areas of some concern include whether employees are expected to report questionable ethical behavior of others (7.58), whether employees believe they are surrounded by coworkers who know the difference between ethical and unethical behaviors and seem to care about the difference (7.83), whether employees are encouraged to speak up about any agency practices and policies that are ethically questionable (7.88), and whether the respondents believe they

are working with one or more trusted confidantes with whom they can discuss ethical dilemmas.

Appendix B outlines some of the tasks governmental entities can consider to ensure that it continues to maintain and promote strong ethical environments.

Survey 2: Employees’ Perceptions About the Ethics of Their Managers/Supervisors

Exhibit 4 below shows the statements used in the employee survey about their supervisors, or managers ethics, the average point score for each statement, and the ethical climate score for each question, as well as the total score for this survey.

Exhibit 4
Statements, Average Point Scores, and Ethical Climate Scores
For Employees Perception of the Ethics
of Their Managers/Supervisors

At the American Samoa Government, Executives.....	Average Point Score	Ethical Climate Score
1. Create an environment in which staff is comfortable raising ethical concerns	8.53	High
2. Appreciate staff bringing forward bad news and don't "shoot the messenger" for doing so	8.16	High
3. Expect and encourages staff to use ethical practices in getting results not "whatever it takes"	8.75	High
4. Gear their decisions to the spirit as well as the principle of the law	8.72	High
5. Treat the public with civility and respect	9.12	High
6. Use public resources only for agency purposes and not for their own personal or political uses (such as agency supplies, staff time and equipment)	8.75	High
7. Appoint and rewards people on the basis of performance and contribution to department's goals and services	7.63	High
8. Treat all members of the public equally, regardless of who has people connections	8.73	High
9. Help elected officials work within their policy role and stay out of the day-to-day work of the department/agency	7.14	Medium
10. Refuse to accept gifts and/or special treatment from those doing business with our department/agency	7.78	High
Total Average Score for All 10 Questions	83	High

Note: (High = 7.5 – 10, Medium = 5.0 – 7.4, Low 0 – 4.99)

As Exhibit 4 above shows, overall participants scored this section **83**, reflecting a “High” ethics score. The scores for 9 of the 10 questions suggest perceptions of ‘High’ ethics with one statement reflecting a perception of “Medium” ethics. The highest score was for the question whether managers or supervisors treat the public with civility and respect (9.12). The respondents also gave ethical climate scores to questions whether managers/supervisors expect and encourage staff to use ethical practices in getting results (8.75), and whether managers/supervisors use public resources for agency purposes not for their own personal or political purposes (8.75).

Although the respondents gave a “High” ethical score for 9 of the 10 questions, respondents gave one question a “Medium” ethical score and several other questions had lower ratings, even though these scores were still rated as “High”. The one question that respondents rated “Medium” was whether managers/supervisors help elected officials work within their policy role and stay out of the day-to-day work of the department (7.14). The “Medium” score response implies that elected officials may extend their policy and oversight roles into day-to-day operations of government departments and that managers/supervisors are not doing enough to prevent this from happening. Another score that was still rated as “High” but lower than some of the others was whether managers/supervisors appoint and reward people based on performance and contribution to their department’s goals and services (7.63), and whether they refuse to accept gifts and/or special treatment from those doing business with our department/agency (7.78).

Ethical climate scores varied somewhat depending on the years of service with ASG

Exhibit 5 below shows the ethical scores by the respondents’ years of service with ASG by employees, supervisors, and combined.

Exhibit 5
Ethical Climate Scores by Years of Service

Years of Service	Employees Survey Response	Supervisors Survey Response	Combined
Less than a Year (<1)	8.82	8.81	8.82
One to Five Years (1-5)	8.59	8.35	8.54
Five to Ten (5-10)	8.18	8.23	8.19
Over Ten Years (10+)	8.38	8.30	8.35
Unknown	7.00	7.00	7.00
All Responses	8.45	8.33	8.42

As Exhibit 5 shows, responses varied by years of service. Overall, employees working less than 1 year (8.82) and employees working 1 to 5 years (8.54), reported higher ethical climate scores than employees working between 5 and 10 years (8.19) and more than 10 years (8.35). This was true for both employees and supervisors. This may indicate that employees get more jaded the longer they work.

Ethical climate scores varied somewhat by respondents’ staffing roles in ASG

Exhibit 6 below shows the ethical climate scores by the respondents’ role in ASG. The roles included line employees, supervisors, and managers. A limited number of employees did not list their role.

Exhibit 6
Ethical Climate Scores By
Participants’ Staffing Role with ASG

Staff Role	Employees Survey Response	Supervisors Survey Responses	Combined
Line Staff	8.45	8.33	8.43
Supervisory	8.30	8.28	8.29
Management	8.82	8.45	8.60
Unknown	8.37	7.57	8.22
All Responses	8.45	8.33	8.42

As Exhibit 6 above shows, participants who identified themselves as Management (8.60) scored the ASG’s ethical climate relatively higher than those in other roles.

Areas for Improvement

The survey results revealed several areas for ASG leadership to focus attention. Although survey respondents scores were “High” for all 10 questions on their own personal ethics, respondents gave relatively lower for several questions, suggesting opportunities for improvement. For instance, participants for the Section 1 Employee Survey reported relatively lower scores for:

- being encouraged to speak up about agency practices and policies that are ethically questionable,
- expected to report questionable ethical behaviors of others,
- being surrounded by coworkers who know the difference between ethical and unethical behaviors and seem to care about the difference, and
- working with one or more trusted confidantes with whom they can discuss ethical dilemmas at work.

Similarly, respondents gave “High” ethical scores for 9 of the 10 questions. For one question, respondents’ ethical climate score was rated as “Medium” and several other questions were rated lower, again suggesting room for improvement. For their Supervisor/Managers respondents reported relatively lower scores for:

- elected officials staying in their lane and out of day-to-day operations,
- appointing and rewarding people based on their performances, and
- accepting gifts and/or special treatment from those doing business with department/agency.

These employee perceptions suggest a need for ASG leadership to reach out to employees and regularly affirm their rights and responsibilities as government employees to bring issues forward. Bringing issues forward can help build the foundation for a strong and open communication between staff and management. Additionally, it is incumbent upon management and elected leadership to self-reflect upon the actions they could take to improve ASG’s ethical climate.

As shown in Appendix B, the Institute of Local Government recommends actions for governments to take to maintain an ethical climate. These recommendations include:

- Incorporating ethics into the hiring and evaluation process for staff
- Conducting regular ethics-related learning opportunities, including examples of ethical dilemmas and ways to resolve the,
- Going through specific items on the assessment to identify further opportunities for positive changes
- Reinforcing the importance of ethical considerations in agency behaviors and decisions

For areas needing some improvement, the Institute of Local Government, recommends the following:

- Evaluating the areas of weakness indicated by the questionnaire and considering targeted remedial actions
- Analyzing the messages that staff and others receive and send about ethics
- Reviewing the agency's policies, including the criteria by which staff are evaluated
- Considering whether having a code of ethics would be helpful for the agency

We endorse these recommendations and suggest that department directors work with their ethics officers to take appropriate steps to maintain and improve the ethics of their departments.




APPENDIX A
Ethical Climate Survey Scoring
Methodology for Each Statement

Response	Points	Scoring Effect	Meaning of the Score
Always	10	High	Your Agency Has A Strong Ethical Environment
Almost Always	7.5	High	Your Agency Has A Strong Ethical Environment
Sometimes	5.0	Medium	Your Agency Is In A Good Place, But Has Room For Improvement
Rarely	2.5	Low	Your Agency's Culture Needs Significant Change
*Don't Know	0	Low	Your Agency's Culture Needs Significant Change

**Responses of "Don't Know" present a gap in an organization's overall ethical climate and therefore, factored negatively into the scoring. Non-responses were not factored into scoring.*

APPENDIX B

**Institute of Local Government's
Steps to Maintain and Improve Ethics**

Score	Rating	What it Means/Steps to Take
<p>75 – 100 per part or 150 – 200 for the entire survey</p>	<p align="center">HIGH</p>  <p align="center">GREEN LIGHT</p>	<ul style="list-style-type: none"> • Congratulations! Your agency has a strong ethical environment. Keep up the good work, including such steps as: • Incorporating ethics into the hiring and evaluation process for staff • Conducting regular ethics-related learning opportunities, including examples of ethical dilemmas and ways to resolve the, • Going through specific items on the assessment to identify further opportunities for positive changes • Reinforcing the importance of ethical considerations in agency behaviors and decisions
<p>50 – 74 per part or 100 – 149 for the entire survey</p>	<p align="center">MEDIUM</p>  <p align="center">CAUTION</p>	<p>Take a moment to reflect. Your agency is at a good place but has room to improve by doing the following:</p> <ul style="list-style-type: none"> • Evaluating the areas of weakness indicated by the questionnaire and considering targeted remedial actions • Analyzing the messages that staff and others receive and send about ethics • Reviewing the agency's policies, including the criteria by which staff are evaluated • Considering whether having a code of ethics would be helpful for the agency <p>Following the best practices indicated in the box above</p>
<p>0 – 49 per part or 0- 98 for the entire survey</p>	<p align="center">LOW</p> 	<p>STOP! Your agency's culture needs significant change.</p> <p>Suggested activities:</p> <ul style="list-style-type: none"> • Identifying the aspects of the agency's culture that foster the problematic behaviors and analyze how to remediate them • Consulting with your agency's attorney about potential violations of laws and agency regulations • Following the best practices indicated in the boxes above