



● **Audit and Ethics Committee**

5/25/2010 Committee Meeting

4d

Subject

Approve Ethics Officer's Business Plan for fiscal year 2010/11

Description

The Ethics Officer's 2010/11 Business Plan ([Attachment 1](#)) provides leadership through enforcement of ethics related laws, rules, and mandates, by educating Directors, staff, and contractors about ethics. In addition, the Ethics Office enhances the ethical culture of Metropolitan and intends to concentrate on the following priorities:

1. **State Mandates and Agency Expectations:** Address questions and expressions of concern in a timely fashion, initiate committee reviews as needed, note patterns of activity, meet mandates, recommend policy adjustments, and file all required reports;
2. **Workshops and Training Materials:** Provide ethics education in a variety of venues;
3. **Ethics Office Visibility:** Promote ethics program visibility throughout Metropolitan;
4. **Member Agencies:** Be a resource for member agencies;
5. **Ethics Office Staff Development:** Encourage staff development with the goal of optimum service for Metropolitan; and
6. **Strategic Planning and Program Review:** Assess program and develop future plans.

Policy

Metropolitan Water District Administrative Code Section 6473: Annual Report to Audit and Ethics Special Committee

California Environmental Quality Act (CEQA)

CEQA determination for Options #1 and #2:

The proposed action is not defined as a project under CEQA because it involves continuing administrative activities, such as general policy and procedure making (Section 15378(b)(2) of the State CEQA Guidelines). In addition, where it can be seen with certainty that there is no possibility that the proposed action in question may have a significant effect on the environment, the proposed action is not subject to CEQA (Section 15061(b)(3) of the State CEQA Guidelines).

The CEQA determination is: Determine that the proposed action is not subject to CEQA pursuant to Sections 15378(b)(2) and 15061(b)(3) of the State CEQA Guidelines.

Board Options

Option #1

Approve Ethics Officer's Business Plan for fiscal year 2010/11

Fiscal Impact: No increase in Ethics Office budget

Option #2

Redirect Ethics Officer's Business Plan for fiscal year 2010/11

Fiscal Impact: Unknown

Staff Recommendation

Option #1


Deni Elliott
Ethics Officer

5/18/2010
Date

Attachment 1 – Ethics Officer's Business Plan for Fiscal Year 2010/11

Ref# e12605051

ETHICS OFFICER'S BUSINESS PLAN FOR FISCAL YEAR 2010/11

Ethics Office Mission - The Metropolitan Water District of Southern California is committed to the fulfillment of its mission in an ethical fashion. Ethical practice includes two levels: a level of compliance in which Directors, officers, and employees follow relevant laws, rules, regulations and policies and a level of ethically ideal behavior, in which Directors, officers, and employees strive to incorporate Metropolitan's core values (integrity, stewardship, open communication, diversity, leadership, and teamwork) in their daily work life. The Ethics Office provides leadership through enforcement of ethics-related laws, rules, and policies; education for Directors, officers, and employees about how ethics apply to their work; and enhancement of the ethical culture of Metropolitan.

Goal No. 1

State Mandates and Agency Expectations: Address questions and expressions of concern in a timely fashion, initiate committee reviews as needed, note patterns of activity, meet mandates, recommend policy adjustments, and file all required reports.

Activities:

- Log, investigate, respond, track, and report on inquiries, expressions of concern and complaints.
- Distribute Operating Policy H-03 Ethics Policy to employees and track acknowledgement of receipt.
- Utilize external investigators and counsel as appropriate to conduct formal review of alleged violation of ethics policies.
- Recommend revisions to Metropolitan's Administrative Code, Human Resources Operating Policy, and general procedures that relate to Metropolitan ethics policies, as needed.
- Review Senate and Assembly bills relating to ethics for their impact on Metropolitan; collaborate with the Legal Department to recommend board action relating to bills.
- Provide periodic reporting on business plan, budget, and activities to Board of Directors.
- Work cooperatively with General Manager, General Counsel and General Auditor to resolve issues and build ethical culture.
- Provide formal opinions relating to application of Metropolitan ethics policies proactively or as requested by Directors or executive staff.
- Collaborate with General Manager's Office and General Counsel's Office to file state-mandated reports.

Goal No. 2

Workshops and Training Materials: Provide ethics education in a variety of venues.

Activities:

- Update employee ethics manual.
- Provide AB 1234 mandated training to Directors and officers.
- Provide Directors and employees face-to-face and asynchronous ethics education.
- Track outcomes and patterns of awareness.
- Write Eye on Ethics columns for *People Interactive*.

Goal No. 3

Ethics Office Visibility: Promote ethics program visibility throughout Metropolitan.

Activities:

- Visit each facility at least annually for formal and informal training and consultation.
- Update Ethics Office Web site, Intranet, and Board of Directors Web site, as needed.
- Use Intranet to alert employees to new ethics materials.
- Produce and distribute poster series and other Ethics Office information throughout Metropolitan.
- Participate in local, regional, and national ethics associations.

Goal No. 4

Member Agencies: Be a resource for member agencies.

Activities:

- Invite member agencies to ethics workshops and events.
- Provide materials and assistance to support member agency ethics programs as requested.
- Serve as a clearinghouse for ethics-related materials developed by member agencies.

Goal No. 5

Ethics Office Staff Development: Encourage staff development with the goal of optimum service for Metropolitan.

Activities:

- Encourage staff members to have at least one training each year, as opportunities and resources are available.

Goal No. 6

Strategic Planning and Program Review: Assess program and develop future plans.

Activities:

- Use developed performance measures to provide annual program review of Ethics Office.