



- Board of Directors
Audit and Ethics Committee

6/28/2011 Committee Meeting

4d

Subject

Approve Ethics Officer's Business Plan for Fiscal Year 2011/12

Description

The Ethics Officer's 2011/12 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
2. Workshops and Training Materials
3. Ethics Office Visibility
4. Provide Requested Resources for Member Agencies
5. Ethics Office Staff Development; and
6. Program Review

Policy

Metropolitan Water District Administrative Code Section 6473: Annual Report to Audit and Ethics 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, and personnel-related actions (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

Adopt the CEQA determination and approve Ethics Officer's Business Plan for fiscal year 2011/12

Fiscal Impact: No increase in Ethics Office budget

Option #2

Adopt the CEQA determination and redirect Ethics Officer's Business Plan for fiscal year 2011/12

Fiscal Impact: Unknown

Staff Recommendation

Option #1


Dennis Elliott
Ethics Officer

6/21/2011

Date

Attachment 1 – Ethics Officer’s Business Plan for Fiscal Year 2011/12

Ref# e12613003

ETHICS OFFICER'S BUSINESS PLAN FOR FISCAL YEAR 2011/12

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.
- Maintain compliance with required training and policy review for Directors and employees.
- Utilize external investigators and counsel as appropriate to conduct formal review of alleged violation of ethics policies.
- Review Assembly and Senate Bills for ethics implications, review implications with Legal Department.
- Review Request for Proposal/Qualifications respondents for potential conflicts of interest.
- Recommend revisions to Metropolitan's Administrative Code, Operating Policy, and general procedures that relate to Metropolitan ethics policies, as needed.
- Provide regular 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:

- Create the following online courses and modules:
 - AB 1234 Metropolitan specific training
 - Conflicts of Interest and Commitment
 - Favoritism
 - Gifts
 - Nepotism and Social Relationships
 - Outside Work Activities
- Conduct face-to-face employee or manager ethics seminars, as requested
- Track outcomes and patterns of awareness.
- Provide quarterly reports that include relevant ethical issues in the news.

Goal No. 3

Ethics Office Visibility: Promote ethics program visibility throughout Metropolitan.

Activities:

- Conduct six external facility visits each year for formal and informal training and consultation.
- Update Ethics Office Web site, Intranet, and Board of Directors Web site monthly.
- 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.
- Maintain library of 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.
- Mentor staff members to create plan for succession.

Goal No. 6

Program Review: Assess program and develop future plans.

Activities:

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