



*Monthly Report to Board of Directors
Metropolitan Water District of Southern California
Office of Ethics
February 2015*

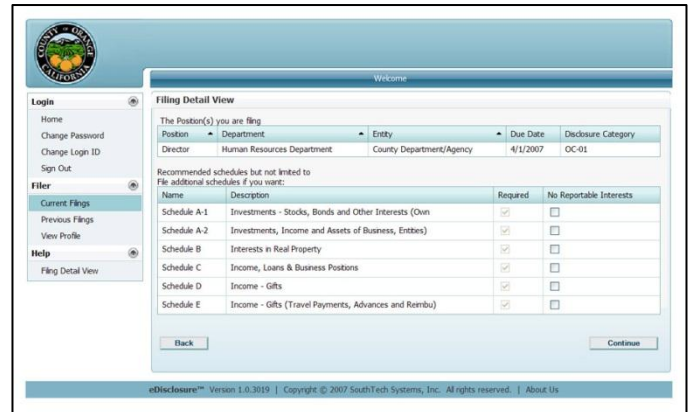
ETHICS IN THE PIPELINE

FILING FORM 700 – NOW ONLINE!

The Political Reform Act (Gov. Code Sections 81000- 91014) requires high-level state and local government officials and designated employees to publicly disclose specified classes of personal assets and income. Designated employees are individuals who make or participate in making Metropolitan decisions that could materially affect their personal economic interests.

Until recently, filers had to submit their Form 700s in paper with ink signatures. Under special legislation, the Fair Political Practices Commission (FPPC) implemented an electronic filing pilot project with several counties and cities statewide. Based on findings that the program had been “an undeniable success story” resulting in significant cost savings, the Legislature in 2012 authorized other state and local jurisdictions to establish and use electronic filings systems. To date, systems developed by two private firms through the pilot project have received FPPC’s certification.

In February 2014, the Ethics Office selected one of the certified providers, SouthTech Systems, to provide Form 700 electronic filing for Metropolitan. The system (eDisclosure) uses an online environment for preparing and submitting all Assuming Office Statements, Annual Statements, Amendments, and Leaving Office Statements.



eDisclosure simplifies the Form 700 process by carrying over relevant data from prior Form 700 filings into the starting template for new reports. It stores each user’s information in a secure, password-protected environment. It also checks each Form 700 for the most common errors, eDisclosure simplifies the Form 700 process by carrying over relevant data from prior Form 700 filings into the starting template for new reports. It stores each user’s information in a secure, password-protected environment. It also checks each Form 700 for the most common errors, including incomplete or missing information, before submission.

The system has an instructional video, an online user guide, and help menus with links to FPPC’s instructions to filers. For designated employees, eDisclosure displays the unique disclosure categories applicable to his or her Metropolitan position in the Administrative Code.

For filers who submit Form 700 to other agencies,

eDisclosure will allow the user to print a paper copy of the completed Form 700 with blanks for inserting other agencies' information along with the filer's ink signature. Filers who choose not to use the electronic system can continue to submit their Form 700s in paper form, as in past practice.

If you wish to file electronically and have not received an email from the Ethics Office with login information please contact Edie Yamasaki at eyamasaki@mw2o.com.

REPORT TO LEGISLATURE

Since 2001, Metropolitan has submitted an annual report to the Legislature on regional progress in water conservation, local resources, and watershed activities. Each year, the report has included a brief description of the Ethics Office's activities. However, this year management determined it would be more appropriate for the Ethics Office to report on its annual progress in a separate stand-alone legislative report, since it is likely that such a reporting process would be more effective at communicating its specific role and activities.

This month, the Ethics Officer prepared a draft report that is being circulated for senior staff input. Further developments will be reported as they occur.

ADVICE

The Ethics Office provides advice to any director, officer, employee, or contractor regarding compliance with any of Metropolitan's ethics rules or policies. Absent unusual circumstances, the Office gives its advice in writing. The Office can provide advice only about events that might happen in

the future. If a request for advice concerns past conduct, depending on the facts it might be necessary for the Office to review the matter as a potential ethics violation.

In January 2015, the Office provided advice regarding:

- "Revolving door," i.e., restrictions on former employees providing contract service.
- Gift limits and reporting requirements.
- Campaign contributions.
- Financial conflicts of interest.
- Outside political activities.
- Form 700 reporting requirements.
- Outside employment.

MONTHLY REPORT TO BOARD OF DIRECTORS
OFFICE OF ETHICS
FEBRUARY 2015

Specific Matters Submitted FY 2014/15

	FY 13/14	Jul 2014	Aug 2014	Sept 2014	Oct 2014	Nov 2014	Dec 2014	Jan 2015	Feb 2015	Mar 2015	Apr 2015	May 2015	June 2015	FY 14/15
Ethics Complaints														
Abuse of Authority	10	2			2(P)	2 2(P)	2	1						11
Conflict of Interest	5		1	1										2
Discrimination	2	1			1									2
Employee Relations	12	1	1		1	1	2	1	2					9
Nepotism	2													
Policy Issues	3			2				1						3
Retaliation	4			1 1(P)	1(P)									3
Sexual Harassment	2													
Theft of Goods	1					1								1
Theft of Time	2													
Total Complaints	43	4	2	5	5	6	4	3	2					31
Ethics Advice														
Abuse of Authority	1			1(P)			1(P)		1					3
Campaign Contributions									2(P)					2
Conflicts of Interest	25	2	1(P)		3(P)	2 2(P)		1	1 2(P)					14
Customer Relations														
Economic Disclosure									1(P)					1
Employee Relations	1													
Gifts	18		2	3	1	2	1(P)	1 1(P)	2					13
Nepotism	1													
Outside Employment	1		1(P)	1				1(P)	1					4
Policy Issues	10				1(P)									1
Revolving Door									3					3
Wage/Hour	1													
Referred									3					3
Total Questions	58	2	4	5	5	6	2	4	16					44
Combined Total	101	6	6	10	10	12	6	7	18					75