



MONTHLY REPORT TO BOARD OF DIRECTORS

Metropolitan Water District of Southern California

Office of Ethics

October 2015

CHANGES TO MONTHLY CONFLICT BULLETINS

About one year ago, the Ethics Officer and General Counsel began providing monthly bulletins to directors to assist them in identifying potential sources of conflicts for upcoming board actions.

Directors have generally had very positive responses to the bulletins. The form of the bulletins and the level of detail appropriate for them have been items of discussion between the Ethics and Legal departments. Moving forward, you likely will notice some changes in the bulletins; we welcome any feedback that directors can provide to make them as useful as possible.

MONTHLY ADVICE AND REQUESTS FOR ASSISTANCE

The Ethics Office provides advice, counseling, or other assistance to any director, officer, employee, or contractor regarding application or interpretation of Metropolitan's ethics rules or policies. Absent unusual circumstances, the Office gives its advice in writing.

The Office can provide advice only prospectively, i.e., about future activities. If it becomes apparent that a request for advice or other assistance concerns events that have already occurred, it might be necessary to review the matter as a potential violation. In September 2015, the Office provided analysis and advice in the following areas:

- Potential conflicts from outside employment.
- Honorarium rules.

- Effect of private business interests on qualifications to participate in internal policy discussions.
- Gifts: General questions about gifts from entities that might do business with Metropolitan.

PROJECTS AND INITIATIVES

The Ethics Officer and staff remain engaged in several projects and initiatives for review, analysis, and evaluation of various aspects of its activities:

- Upcoming budget and personnel proposal and review.
- Procurement of electronic case management and document management software solution.
- Amendments to Metropolitan's conflict of interest code (i.e., designated positions and disclosure categories)
- Monthly director conflict bulletins.
- Revisions to employee ethics policy, including cooperation obligations.
- Options for obtaining benchmarking survey data.
- Upcoming director training session on avoiding sexual harassment.

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Matters Addressed FY 2015/16

	FY 14/15	Jul 2015	Aug 2015	Sept 2015	Oct 2015	Nov 2015	Dec 2015	Jan 2016	Feb 2016	Mar 2016	Apr 2016	May 2016	June 2016	FY 15/16
<u>Ethics Complaints</u>														
Abuse of Authority	14	1	2	3										6
Campaign Contributions														
Conflict of Interest	1													
Discrimination		1											1	
Economic Disclosure														
Gifts														
Misleading Associations														
Nepotism														
Outside Employment														
Outside Scope of Ethics Office	21													
Revolving Door														
Whistleblower Protection	3													
Total Complaints	39	1	2	3	1									7
<u>Ethics Advice</u>														
Abuse of Authority	3	2											2	
Campaign Contributions	2													
Conflicts of Interest	19	1	2	3	4									10
Economic Disclosure	16			2										2
Gifts	25	1 2											3	
Misleading Associations														
Nepotism														
Outside Employment	4		1		1									2
Outside Scope of Ethics Office	3													
Public Inquiries				1										1
Revolving Door	8	3												3
Whistleblower Protection														
Total Questions	80	6	4	8	5									23
Combined Total	119	7	6	11	6									30