



# ETHICS OFFICE

## MONTHLY REPORT TO BOARD OF DIRECTORS

Metropolitan Water District of Southern California  
Office of Ethics, December 2015

### MESSAGE FOR THE NEW YEAR

Although we write this in the midst of the holiday season, it is intended as the first Ethics Office publication of the New Year. Traditionally a time for both reflections about the past and plans for the future, the first page of a new calendar inspires a sense of new beginnings. It is a natural time to take stock of priorities and ultimate goals, even as we continue the day-to-day tasks of our work.



As we prepare to usher in 2016, we are undertaking a number of projects to evolve the ethics program. I am looking forward to all that the year has in store for Metropolitan's Ethics Office, and invite everyone in the Metropolitan family to join our efforts.

### NEW CASE AND MATTER MANAGEMENT AND REPORTING SYSTEM

During the past months, several directors expressed a desire to receive more detailed and objective information about the Ethics Office's activities.

This month, we begin implementing a new case management and matter management system called i-Sight. Several leading government agencies use this system to track, store, and report on critical data associated with investigations and other ethics and compliance functions.

We decided to implement this system to better manage the information associated with our work. The system will allow us to maintain all case files, communications, research, and resource data in a centralized, searchable database. It will enable us to more efficiently and accurately access data from prior cases or advice requests. This capacity will make it faster and easier to ensure consistency in interpretation and application of Ethics Office rules and policies.

Of equal importance, a modernized matter management system will provide an objective window into the Ethics Office's cases and other activities. This in turn will enable us to provide the Audit & Ethics Committee and the Board of Directors with more information with which to evaluate and guide the Ethics Office.

## 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 December 2015, the Office provided analysis and advice in the following areas:

- Concurrent outside employment.
- Potential conflicts of interest due to prior employment or source of income.
- Incompatible offices.
- Permissible private uses of public facilities.

## 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.
- Acquisition and preliminary implementation 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.

MONTHLY REPORT TO BOARD OF DIRECTORS  
OFFICE OF ETHICS, DECEMBER 2015

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
<b><u>Ethics Complaints</u></b>														
Abuse of Authority	14	1	2	4			2							9
Political Activities														0
Conflict of Interest	1													0
Discrimination					1									1
Economic Disclosure														0
Gifts														0
Misleading Associations														0
Nepotism														0
Outside Employment														0
Outside Scope of Ethics Office	21						1							1
Revolving Door														0
Whistleblower Protection	3													0
<b>Total Complaints</b>	<b>39</b>	<b>1</b>	<b>2</b>	<b>4</b>	<b>1</b>	<b>0</b>	<b>3</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>11</b>
														0
<b><u>Ethics Advice</u></b>														0
Abuse of Authority	3	2				2								4
Political Activities	2						1							1
Conflicts of Interest	19	1	2	3	4	3								13
Economic Disclosure	16			2										2
Gifts	25		1	2			3							6
Misleading Associations														0
Nepotism														0
Outside Employment	4		1		1									2
Outside Scope of Ethics Office	3													0
Public Inquiries				1										1
Revolving Door	8	3												3
Whistleblower Protection														0
<b>Total Questions</b>	<b>80</b>	<b>6</b>	<b>4</b>	<b>8</b>	<b>5</b>	<b>5</b>	<b>4</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>32</b>
<b>Combined Total</b>	<b>119</b>	<b>7</b>	<b>6</b>	<b>12</b>	<b>6</b>	<b>5</b>	<b>7</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>43</b>