



ETHICS OFFICE MONTHLY REPORT

TO BOARD OF DIRECTORS

Metropolitan Water District of Southern California

MARCH 2017

2016 ANNUAL FORM 700 FILING SEASON RECAP

Another Form 700 filing season has come and gone. April 3rd marked the deadline to submit the 2016 Statement of Economic Interests filing on time.

New directors and employees who filed Assuming Office Statements on or after October 1, 2016 are not required to file an Annual Statement, until April 2018.

Filers had a choice of filing electronically or manually, as in the previous year. Most of the electronic filers – particularly employees – shared positive feedback about the process.



We also received comments from some directors about changes they would like to see. Most notable, is a strong desire from directors serving in multiple government offices to be able to submit a single Form 700 one time to the FPPC for all of his or her agencies. This season, the FPPC did not permit electronic multiple-agency forms. Directors holding other positions for which the Form 700 is required may complete one expanded statement covering the disclosure requirements for both positions. However, the FPPC requires that you submit the forms to each agency you serve. The FPPC is making technological advances, and this requirement could change in the future. The Ethics Office will monitor the issue and inform you if these requirements change.

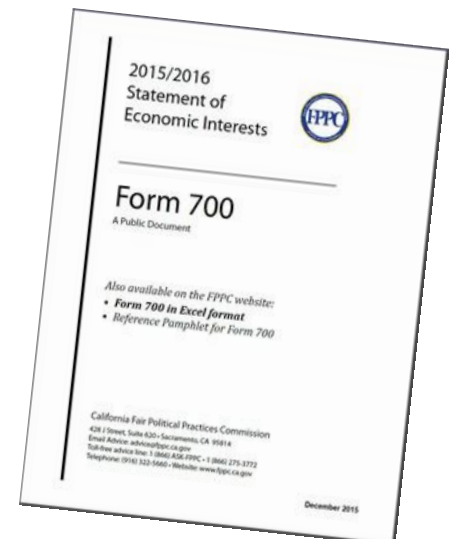
2016 FORM 700 FILING SEASON STATS (DIRECTORS & DESIGNATED EMPLOYEES)

TOTAL BOARD MEMBERS FILED ON TIME– 32 OF 35

DESIGNATED EMPLOYEES FILED ON TIME– 246 OF 263

ADVICE MATTERS RELATED TO SEI FILINGS – 24

PAPER FILERS – 24



PROJECTS & INITIATIVES

The Ethics Officer and staff remain engaged in several projects and initiatives for review, analysis, and evaluation of various aspects of Metropolitan's activities.

Completed this month:

- ⇒ In conjunction with Human Resources Department, the Ethics Office completed consultation with the bargaining units over the proposed Conflict of Interest Code Amendments
- ⇒ Ethics staff's draft of proposed internal rules and policies changes completed.

Emerging this month:

- ⇒ Revised Conflict of Interest Code posted for public comment.
- ⇒ Licenses pending for online AB1661 Sexual Harassment Training for directors.
- ⇒ Investigation Guidelines revisions drafted.
- ⇒ Revisions to Operating Policies on ethics and fraud related matters begun.
- ⇒ Continue developing proposed Ethics Policy improvements.
- ⇒ Development of new comprehensive reports.

ADVICE & 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 provides its advice in writing.

The Ethics 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 March 2017, the office provided analysis and advice in the following areas:

- ◆ Statements of Economic Interest
- ◆ Conflicts of Interest
- ◆ Gifts
- ◆ Outside Employment

Matters Addressed FY 2016-17	FY	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun
	15/16	2016	2016	2016	2016	2016	2016	2017	2017	2017	2017	2017	2017
Ethics Complaints													
Abuse of Authority	13	1	1	2		1		1		1			
Campaign Contributions	3												
Conflict of Interest	2	1			2		2						
Discrimination	1												
Economic Disclosure							1						
Gifts													
Misleading Associations	1												
Nepotism	1												
Outside Employment	2		1		2	1							
Outside Scope of Ethics Office		1					1	1					
Revolving Door													
Whistleblower Protection		1	1						1				
Total Complaints	23	4	3	2	4	2	4	2	1	1	0	0	0
Ethics Advice Questions													
Abuse of Authority	4												
Campaign Contributions	9							1					
Conflicts of Interest	51	3	3	1	4	1	2	8	5	3			
Economic Disclosure	33		1	5	2	3	1	5	6	15			
Gifts	19		2	2	1	1	3	2		2			
Misleading Associations													
Nepotism	2			2	1	1							
Outside Employment	4			1						1			
Outside Scope of Ethics Office	3		1	1	1								
Public Inquiries	1												
Revolving Door	3												
Whistleblower Protection													
Total Questions	129	3	7	12	9	6	6	16	11	21	0	0	0
Combined Total	152	7	10	14	13	8	10	18	12	22	0	0	0