



## Ethics Office Monthly Report

**MWD**

METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA



July 2018

### COMPLIANCE

As part of a state-mandated annual review of Metropolitan's Conflict of Interest Code, staff reviewed job descriptions and added five new job positions to the Code. As individuals are hired into those positions, staff will notify them about their filing obligation and advise them on what financial interests they must report.

Developed a new process to help former employees achieve compliance with their Leaving Office Statements of Economic Interest. An internal review showed that 22 former employees had not filed Leaving Office statements within 30 days of separation from Metropolitan, as required by state law. In collaboration with HR, staff notified the 22 individuals and advised them how to comply. Staff will continue to evaluate the status of "Leaving Office" filings on a weekly basis, send notifications for late filers, and advise them on achieving compliance.

Continued individual consultations with new filers to help promote accurate and timely reporting of Assuming Office statements of economic interests. Staff also began reviewing the timeliness of Assuming Office filings more frequently – on a weekly basis – to help promote compliance.

Provided technical assistance to

employees and officials filing Assuming and Leaving Office statements of economic interests.

### ADVISORY SERVICES

Provided advice in the areas of conflicts of interest, recusals, nepotism, gifts from consultants, and financial disclosure.

Created monthly conflicts bulletin for directors in collaboration with the General Counsel.

Monitored FPPC Commission meetings for regulatory changes and policy discussions at the state level that could impact Metropolitan officials or ethics policies.

### EDUCATION

In collaboration with the General Counsel and the training provider, evaluated the scope and content of the forthcoming Brown Act training for directors. As a reminder, this training will take place directly following the September 11 Board of Directors meeting.

Presented Ethics Office overview to new employees at orientation.

### POLICY

Continued evaluating Metropolitan's

Ethics Operating policy and the Administrative Code's ethics provisions in preparation for Olson Hagel's report scheduled for August.

## **OPERATIONS**

Completed a first draft of the Ethics Office's chapter in Metropolitan's "Annual Report for the Fiscal Year July 1, 2017 to June 30, 2018." Staff will continue to work with External Affairs on final revisions to the Ethics Office's chapter in the coming months. The final publication is scheduled for distribution in January 2019.

## **INVESTIGATIONS**

Finalized Investigation Report and preliminary Ethics Officer findings that an employee violated an Ethics Policy provision on outside employment. The matter was closed with no further action because the employee separated from Metropolitan.

Finalized preliminary review of retaliation complaint and determined there was insufficient evidence to proceed to a full investigation.

Received four complaints in July. Two involve allegations of Ethics Policy violations, and are under review. The other two allege personnel disputes and were referred to HR.