



Ethics Office Monthly Report

MWD

METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

December 2018

STAFF DEVELOPMENT

40th Annual COGEL Conference



Deputy Ethics Officer Kelli Shope and Analyst Hilda Rodriguez attended the 40th Annual COGEL Conference in Philadelphia from December 9 – 12.

The Council on Governmental Ethics Laws (COGEL) is the preeminent organization of

government ethics administrators. Members include other governmental entities, law firms, corporations, and educational institutions.

The COGEL Conference offers members a unique opportunity to network with top governmental ethics professionals from over 85 jurisdictions, learn about the latest trends and issues in governmental ethics, and gain access to technical innovations that may benefit their agencies.

Ethics staff covered over 20 sessions, including the following:

- ❖ Ethics in the 21st Century
- ❖ Ethics Update: Advice, Legislation and Litigation
- ❖ Ethics Update II: Education, IT, and Financial Disclosure
- ❖ Financial Disclosure
- ❖ Giving Advice
- ❖ The Wall of Division - Agency Advice and Enforcement Functions

- ❖ Changing a Culture of Non-compliance
- ❖ Training Conversations that Matter
- ❖ Reacting to the Erosion of Ethical Norms
- ❖ Introduction to Lobbying Regulations
- ❖ Enforcement and Investigation Trends

Other highlights included an in-depth presentation by Former White House Counsel John Dean, interacting with staff from California's Fair Political Practices Commission, and the attending the Innovation Showcase featuring new technology from COGEL members across the country.

Kelli Shope also volunteered to serve on two COGEL Committees for 2019.

COMPLIANCE

Continued efforts to secure 100% participation in state-mandated AB1234 ethics training by the year's end. To date, current participation for the compliance period is 83%.

Provided substantive and technical assistance to employees and Board members filing Assuming and Leaving Office Form 700s.

Monitored the status of Assuming Office and Leaving Office filings and sent notifications to filers as necessary.

ADVISORY SERVICES

Provided advice in the areas of: gift limits, conflicts of interest, and financial disclosure.

Held individual consultations with new Form 700 filers to help promote accurate and timely

filings.

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

EDUCATION

Presented an Ethics Office overview at new employee orientation.

Held informational session with new director.

Updated the Form 700 online training video for employees to reflect regulatory changes for 2019.

INVESTIGATIONS

Processed three complaints as follows:

1. Whistleblower complaint alleging that an employee is causing unsafe work conditions. This matter was referred to HR after initial review.
2. Whistleblower complaint alleging that an employee violated the Nepotism Policy.

This matter is duplicative of a previous complaint that is currently under review.

3. Management complaint referral to the Ethics Office from HR alleging that an employee's outside employment activity is violating provisions of the Ethics Policy. This matter is currently under review.

Continued discussions with HR's Employee Relations staff regarding collaboration on investigations and inter-office referrals.

INVESTIGATION FINDINGS

Completed a full investigation into whether an employee: (1) performed prohibited outside work for a Metropolitan consultant; (2) participated in Metropolitan decisions with a conflict of interest; or (3) failed to report disclosable outside income on Form 700.

The Interim Ethics Officer found that the evidence did not substantiate the allegations. This finding was based on documentary evidence and witness statements.

Ethics Office Dashboard

Quarterly Update

(October 1 – December 31, 2018)

Advisory Services

< 5 hours	5-20 hours	> 20 hours
28 matters	4 matters	0 matters
120+ staff hours		

Ethics Compliance

COI Amend	Training	Form 700 Admin/Assist
650+ staff hours		

Investigations

< 5 hours	5-20 hours	> 20 hours
4 matters	4 matters	3 matters
360+ staff hours		

Other

Policy	Special Projects	General Administrative
670+ staff hours		