



## Ethics Office Monthly Report

**MWD**

METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

**February 2019**

### COMPLIANCE

**\*Notice:** Please note that your Annual Form 700 is due April 2, 2019. If you would like to file a **combined statement** to reflect all of your government positions, or need any other assistance, please contact the Ethics Office. To begin your filing, click on the link below:

<https://www.southtechhosting.com/MWD/eDisclosure/>

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

Monitored the status of Assuming Office and Leaving Office filings and sent notifications to filers to increase compliance. Referred one employee to the Fair Political Practices Commission for not filing a Form 700 Leaving Office statement. Multiple attempts to contact the employee were made to resolve the issue.

Continued efforts to secure 100% participation in state-mandated biennial AB1234 ethics training. To date, current participation for the compliance period remains at 97%.

Met with Board support team and consulted with Legal on processes in place for directors assuming and leaving their Metropolitan positions, as part of a broader effort to streamline the process for Form 700 assuming and leaving office filings.

### ADVISORY SERVICES

Responded to an increased number of requests for advice, due primarily to the beginning of the Annual Form 700 filing

season. The most common questions involved financial disclosure; other questions related to conflicts of interest, gifts, outside employment, and recusals.

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.

Participated in meetings and document preparation with the General Counsel and outside counsel Lance Olson on proposed changes to Metropolitan's ethics policies and procedures.

Held a joint teleconference with the FPCC's Enforcement Director to discuss handling ethics allegations.

### EDUCATION AND TRAINING

Provided new 15 minute online Form 700 training program to over 600 employees required to file Form 700 under Metropolitan's Conflict of Interest Code.

The training introduces the concept of financial disclosure, interactively demonstrates how to navigate through the Conflict of Interest Code, explains how to determine what interests to disclose, and provides examples of common reporting scenarios.

Presented an Ethics Office overview at new employee orientation.

## **INVESTIGATIONS**

Processed two complaints as follows:

1. Whistleblower complaint alleging unfair treatment in a recent promotion process. This matter was referred to EEO after initial review.
2. Whistleblower complaint alleging discrimination and unfair treatment in a recent promotion process (duplicative of the complaint filed earlier this month). This matter was referred to EEO after initial review.

Collaborated with Employee Relations staff on complaints involving overlapping HR issues and inter-office referrals.