



Ethics Office Monthly Report

MWD

METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

March 2019

COMPLIANCE

Annual Form 700

Managed the conclusion of the 2018 Annual Form 700 filing season. This involved:

- Holding Form 700 consultations with directors and employees to evaluate their unique reporting circumstances for 2018
- Responding to requests for specific advice on what interests to report and how to report them on Form 700
- Providing technical assistance to approximately 150 employees on the Form 700 electronic filing system and related issues
- Assisting member agencies with issues they encountered with their directors' Form 700 filings
- Obtaining clarification from the Fair Political Practices Commission (FPPC) on Form 700 issues
- Conducting facial reviews of 87200 filers' Form 700s

As of March 31, 29 out of 38 directors and 431 out of 603 employees had filed their Annual Form 700 (Note: directors who recently assumed office do not have to file an Annual report this year).

Assuming and Leaving Office Form 700

Continued to provide substantive, technical, and administrative assistance to Board members and employees filing Assuming and Leaving Office Form 700s, including:

- Monitoring the status of Assuming Office and Leaving Office filings
- Notifying filers who did not file by the filing deadline
- Responding to requests for advice on reportable financial interests
- Assisting directors with combining their Leaving Office and Annual Form 700 filings
- Coordinating with Board staff to determine the date on which Board members assume and leave their positions and notifying Board members of their filing responsibility
- Coordinating with HR to evaluate which new hires and temporarily promoted employees are required to file Form 700 and notifying new filers of their filing requirement
- Referring a former employee to the FPPC for not complying with the Form 700 filing requirement after providing multiple notifications

AB 1234 Training

To date, current participation for the compliance period remains at 97%.

Continued efforts to secure 100% participation in state-mandated biennial AB 1234 ethics training.

ADVISORY SERVICES

Advised Human Resources on the Ethics Operating Policy's outside employment restrictions applicable to all employees.

Collaborated with HR to find a reasonable application of Metropolitan's outside employment restriction to part-time student interns who are also employed by outside entities. The accommodation enabled the hiring of the student interns, while still addressing concerns over potential conflicts of interest.

Due to the upcoming Annual Form 700 deadline, responded to an increased number of requests for advice on financial disclosure.

Responded to other requests for advice relating to avoiding conflicts of interest, outside employment, and gift limitations related to vendor dinners.

Monitored monthly Fair Political Practices Commission meeting for updates on proposed legislation related to governmental ethics. Will continue to monitor legislative developments and report back to the Board upon adoption.

Initiated individual consultations with new Form 700 filers to help orient employees to their new filing requirement and to 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.

EDUCATION AND TRAINING

In addition to the joint meetings and drafting described in the aforementioned section, collaborated with Olson Hagel and the General Counsel on a review of current ethics training and education practices and a proposal for enhancing these areas.

Presented Ethics Office overview at new employee orientation.

INVESTIGATIONS

Processed three complaints as follows:

1. Whistleblower complaint alleging unfair treatment in a recent employee-manager dispute. This matter was referred to HR after initial review.
2. Whistleblower complaint alleging retaliation following a complaint to management. This matter is currently under joint review with HR.
3. Whistleblower complaint alleging an abuse of authority by a mid-level manager. This matter is currently under review.

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

Ethics Office Dashboard

Quarterly Update

(January 1 – March 31, 2019)

Advisory Services

< 5 hours	5-20 hours	> 20 hours
57 matters	3 matters	1 matter
250+ staff hours (Primarily Annual Form 700 Assistance)		

Ethics Compliance

COI Amend	Training	Form 700 Admin/Assist
700+ staff hours (Primarily Annual Form 700 Assistance)		

Investigations

< 5 hours	5-20 hours	> 20 hours
4 matters	2 matters	1 matters
300+ staff hours (Primarily one complex investigation)		

Other

Policy	Special Projects	General Administrative
700+ staff hours (Primarily the Ongoing Ethics Office Policy/Procedures Review)		