



## Ethics Office Monthly Report

MWD

METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

August 2019

The Ethics Office requests feedback on the proposed Administrative Code changes related to ethics prior to the Audit and Ethics Committee meeting of September 24. Please submit your feedback to Lance Olson at [lance@olsonhagel.com](mailto:lance@olsonhagel.com).

### ADVICE

In coordination with the General Counsel, launched a new tool for directors to help determine whether they need to recuse themselves from Metropolitan matters. This "Conflicts Bulletin Preview" lists outside entities involved in upcoming Board meetings. Directors are encouraged to seek advice if they may have a financial interest in any listed entity.

Handled 21 advice matters involving the areas of recusals, financial disclosure, conflicts of interest, receipts of event tickets, offer of travel to a conference from a vendor, and serving on a nonprofit board.

Collaborated with General Counsel on a unique advice matter involving state conflict of interest law and Metropolitan ethics policy.

### EDUCATION AND TRAINING

Held individual new filer training sessions with six new employees. Employees received personalized training on how to file Form 700, conflicts of interest, and related ethics rules.

Presented an Ethics Office overview and primer on ethics rules at new employee orientation.

### OUTREACH

Collaborated with External Affairs on outreach strategies including the development of Ethics Office video communications and redesign of the Ethics Office IntraMet page.

Worked with Human Resources staff on creating a survey to gain feedback from employees on ethics concepts.

### COMPLIANCE

Assisted Board members, employees, and a consultant with Form 700 filings.

Monitored the status of Assuming Office and Leaving Office Form 700 filings and secured compliance from a late Annual filer.

Provisionally added three new Metropolitan positions to the Conflict of Interest Code based on their job duties, as required by state law. Staff will recommend that the new positions be permanently added during the biennial Code amendment process later this year.

Monitored monthly meetings of the Fair Political Practices Commission (FPPC) for regulatory and other items applicable to Metropolitan officials.

### INVESTIGATIONS

*Ethics Officer Findings* – Completed an investigation into whether an employee violated the Administrative Code retaliation rules by discouraging other employees from reporting workplace safety violations. The

Ethics Officer found that the evidence did not substantiate the allegation. The matter was closed and no action was taken.

***Completed Investigations*** – Completed an investigation into whether a supervisor violated the nepotism provisions of Metropolitan’s Ethics Policy by directly supervising a relative. The matter was closed when the supervisor retired from Metropolitan. The Ethics Officer consulted with Human Resources on overlapping areas of concern.

***AUGUST ADVICE AND INVESTIGATION DATA***

Advice Provided	21
Complaints Received	3
Investigations Opened	0
Pending Investigations	1