- **Board of Directors**
  *Community and Workplace Culture Committee*

5/13/2025 Board Meeting

**7-1**

## Subject

Approve amending the list of Metropolitan officials required to take AB 1234 state ethics training to include all Form 700 filers; the General Manager has determined that the proposed action is exempt or otherwise not subject to CEQA

## Executive Summary

Under Metropolitan's Administrative Code, the Ethics Officer has responsibility for various ethics-related education and compliance mandates. In part, the Administrative Code requires the Ethics Officer to monitor and maintain compliance records for Metropolitan officials designated by the Board of Directors to take biennial state ethics training (AB 1234), seek AB 1234 training compliance from Metropolitan officials not in compliance, and certify Directors' compliance with AB 1234 training.

Under state law, an agency's governing body designates which employees are required to take biennial AB 1234 ethics training. Metropolitan's current list of employees designated to take this training is outdated and does not include many new, high-level positions. The Ethics Officer proposes that the Board amend the list of Metropolitan officials required to take AB 1234 ethics training to include all Form 700 filers. This would align with the Board's expectation that the Ethics Office expand Metropolitan's ethics education program, create an objective standard for determining AB 1234 training requirements, and mirror the ethics training requirements of other local agencies, including several member agencies. Further, this proposal would avoid frequent board actions to update the list of designated employees each time the Ethics Office proposes that new positions be added to the list.

## Proposed Action(s)/Recommendation(s) and Options

**Staff Recommendation:  Option #1**

**Option #1**

Approve amending the list of Metropolitan officials required to take AB 1234 state ethics training to include all Form 700 filers.

**Fiscal Impact:**  There is minimal fiscal impact associated with this board action.
**Business Analysis:**  If approved, the AB 1234 compliance program will be more streamlined, and Form 700 filers will be more aware of their public service obligations.

**Option #2**

Do not approve amending the list of Metropolitan officials required to take AB 1234 state ethics training to include all Form 700 filers.

**Fiscal Impact:**  None
**Business Analysis:** If not approved, the Ethics Officer will propose to the Board amendments to the list of designated officials each time a need arises and Form 700 filers will not receive state ethics training to reinforce their public service obligations.

## Alternatives Considered

Not applicable

## Applicable Policy

Metropolitan Water District Administrative Code Section 11104: Delegation of Responsibilities

## Related Board Action(s)/Future Action(s)

Not applicable

## California Environmental Quality Act (CEQA)

### CEQA determination(s) for Option #1:

The proposed action is not defined as a project under CEQA because it involves organizational, maintenance, or administrative activities; personnel-related actions; and/or general policy and procedure making that will not result in direct or indirect physical changes in the environment. (Public Resources Code Section 21065; State CEQA Guidelines Section 15378(b)(2) and (5)).

### CEQA determination(s) for Option #2:

None required

## Details and Background

### Background

Assembly Bill 1234 (AB 1234) requires that local agency officials take biennial state ethics training covering conflicts of interest, misuse of public resources, gifts, and other ethics-related topics. Under Metropolitan's Administrative Code, the Ethics Officer is responsible for ensuring Metropolitan's compliance with AB 1234. This includes monitoring AB 1234 compliance, maintaining compliance records, seeking training certificates from non-compliant officials, and certifying directors' compliance. The Ethics Officer also provides AB 1234 training to directors and designated employees every other year through an outside law firm or online course.

State law generally tasks local agency governing boards with designating which agency employees are required to take AB 1234 ethics training. The current list of designated officials required to take AB 1234 training was created prior to the current Ethics Officer joining Metropolitan and prior to the Board of Directors increasing the Ethics Officer's responsibilities for AB 1234 compliance and ethics education.

The list of Metropolitan officials currently designated to take AB 1234 training includes:

- o Directors
- o General Manager
- o Chief Financial Officer
- o Treasurer
- o Assistant Treasurer
- o Budget and Treasury Manager
- o Investment Management Specialist
- o Assistant General Managers
- o Ethics Officer
- o Ethics Office staff
- o General Auditor
- o Deputy General Auditor
- o General Counsel
- o Assistant General Counsels
- o Deputy General Counsels
- o Senior Deputy General Counsels
- o Chief Deputy General Counsels

     o  Chief Administrative Officer
     o  Controller

The list of designated officials is outdated and does not include several new or revised Metropolitan positions, including the Chief of Staff, Chief DEI and EEO Officers, Principal Deputy General Counsel, and Chief Sustainability, Resiliency and Innovation Officer positions.

After managing additional AB 1234 and ethics education responsibilities in recent years, the Ethics Officer requests that the Board approve expanding the list of Metropolitan officials required to take AB 1234 state ethics training to include all Form 700 filers. This proposal aligns with the Board's expectation that the Ethics Officer provide more ethics training to Metropolitan officials and, specifically, more ethics training to Form 700 filers (Admin. Code section 7605).

This proposal also aligns with the Ethics Officer's view that having more Metropolitan officials receive AB 1234 training certification every two years will help increase our officials' knowledge of state ethics laws, reinforce the obligations of public service, prevent inadvertent ethics violations and related investigations, and reflect positively on Metropolitan as a whole. Further, updating the designated officials list in this manner would create a bright line standard for identifying which employees are required to take AB 1234 training and is more efficient long-term than seeking Board approval each time the Ethics Officer proposes a position be added to the list. This proposal also mirrors the approach taken by many local government agencies, including Metropolitan member agencies (e.g. City of Los Angeles, City of Beverly Hills, City of Anaheim).

Under the Administrative Code, it is the Ethics Officer's responsibility (with final approval from the FPPC) to designate which Metropolitan employees are required to file Form 700 financial disclosure forms ("Form 700 filers") pursuant to state law. The Ethics Officer's determination on whether a position requires filing a Form 700 is based on state standards. Generally, persons holding Metropolitan positions are designated as Form 700 filers if they make or participate in making district decisions which may affect financial interests (See **Attachment 1** for a list of current positions required to file Form 700).

Because Form 700 filers are involved in the type of government decision-making requiring disclosure of personal financial information, employees designated in these positions should also be designated for additional ethics training to help ensure they understand their ethical obligations in carrying out their official duties at Metropolitan. AB 1234 training reinforces the obligations of public service and also covers state ethics provisions that apply to Metropolitan employees but are not addressed by internal policies or covered in other trainings. AB 1234 training is provided by the state at no charge to local agencies.

_____                5/5/2025
*Abel Salinas*                                                                          *Date*
*Ethics Officer*


**Attachment 1 – Positions Required to File Form 700 (Revised)**

**Ref# e12703969**

| Positions Required to File Form 700 |
|---|
| Accounts Payable Team Manager |
| Agricultural Liason |
| Aircraft Pilot |
| Assistant Controller - Accounting Unit Manager |
| Assistant Controller - Financial Reporting Unit Manager |
| Assistant Ethics Officer |
| Assistant General Auditor |
| Assistant General Counsel |
| Assistant General Manager/ External Affairs |
| Assistant General Manager/Chief Administrative Officer |
| Assistant General Manager/Chief Financial Officer |
| Assistant General Manager/Chief Operating Officer |
| Assistant General Manager/Strategic Water Initiatives |
| Assistant Group Manager |
| Assistant Treasurer |
| Assistant Unit Manager - Conveyance & Distribution |
| Associate Deputy General Counsel |
| Bay-Delta Initiatives Manager |
| Bay-Delta Initiatives Policy Manager |
| Board Administrator |
| Board Executive Officer |
| Board Executive Secretary |
| Capital Investment Plan Team Manager |
| Chief Diversity, Equity and Inclusion Officer |
| Chief EEO Investigator |
| Chief of Staff |
| Chief Photographer |

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| Chief Safety, Security and Protection Officer |
| Chief Sustainability, Resilience and Innovation Officer |
| Chief Sustainability, Resiliency and Innovation Officer |
| Chief Videographer |
| Classification & Compensation Manager |
| Climate Action Plan Program Manager |
| Compliance and Reporting  Manager |
| Construction Inspector III |
| Construction Inspector IV |
| Construction Inspector V |
| Consultants Who Manage Public Investments |
| Controller |
| Debt Management Specialist |
| Deferred Compensation Investment Committee Member |
| DEI - Outreach & Engagement Specialist |
| DEI Workforce Development Manager |
| Deputy Auditor III |
| Deputy Chief Diversity, Equity and Inclusion Officer |
| Deputy Chief EEO Officer |
| Deputy Ethics Officer |
| Deputy General Auditor |
| Deputy General Counsel |
| Director of Information Technology Services |
| Education Team Manager |
| Engineer |
| Environmental Planning Unit Manager |
| Environmental Specialist |
| Equal Employment Opportunity Manager |

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| Equal Employment Opportunity Officer |
| Ethics Officer |
| Executive Advisor - Water Res and Capital Improvements |
| Executive Legislative Representative |
| Executive Officer and Assistant General Manager/ Water and Technical Resources |
| Executive Strategist |
| Finance Services Unit Manager |
| Fleet Coordinator |
| General Auditor |
| General Counsel |
| General Manager |
| Government and Regional Affairs Representative |
| Graphic Arts Designer |
| Graphic Technician III |
| Group Manager - Conveyance & Distribution |
| Group Manager - Engineering Services |
| Group Manager - External Affairs |
| Group Manager - Finance |
| Group Manager - Human Resources |
| Group Manager - Information Technology |
| Group Manager - Real Property |
| Group Manager - Water Resource Management |
| Group Manager - Water System Operations |
| Human Resources Info Systems Manager |
| Human Resources Manager I |
| Human Resources Manager II |
| Human Resources Manager III |
| Human Resources Strategic Partner |

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| Human Resources Strategic Program Manager |
| Hydroelectric Specialist II |
| Info Gov & Enterprise Content Mgt Specialist |
| Information Technology Architect |
| Information Technology Architect - Enterprise Software |
| Information Technology Communication Technician III |
| Information Technology Service Manager |
| Information Technology Specialist - Disaster Recovery |
| Inspection Trip Manager |
| Inspection Trip Specialist |
| Inspections Trip Team Manager |
| Instrumentation & Control Technician Specialist |
| Inventory Coordinator |
| Investment Management Specialist |
| Land Surveyor |
| Landscape Maintenance Coordinator |
| Law Office Administrator |
| Legislative Services Team Manager |
| Management Principal Administrative Analyst |
| Manager of Administrative Services |
| Manager of Bay - Delta Science and Regulatory Strategy |
| Manager of Bay-Delta Programs |
| Manager of Colorado River Resources |
| Manager of Treasury and Debt Management |
| Microcomputer Technology Supervisor |
| Occupational Health & Safety Specialist III |
| Occupational Safety & Health Specialist |
| Operations & Maintenance Supervisor |

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| Organizational Development & Training Manager |
| Outreach Program Manager, Project Labor Agreements |
| Plant Laboratory Supervisor |
| Power Planning Specialist |
| Principal Administrative Analyst |
| Principal Architect |
| Principal Auditor |
| Principal Benefits Analyst |
| Principal Buyer |
| Principal Deputy General Counsel |
| Principal EEO Analyst |
| Principal Employee Relations Specialist |
| Principal Engineer |
| Principal Engineering Technician |
| Principal Environmental Specialist |
| Principal Equal Employment Opportunity Analyst |
| Principal Government and Regional Affairs Representative |
| Principal Human Resources Info Systems Analyst |
| Principal Human Resources Training Specialist |
| Principal Information Technology Analyst |
| Principal Information Technology Network Engineer |
| Principal Land Surveyor |
| Principal Legislative Representative |
| Principal Project Controls Specialist |
| Principal Public Affairs Representative |
| Principal Real Estate Representative |
| Principal Resource Specialist |
| Principal Systems Analyst |

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| Principal Training Administrator |
| Principal Water Quality Specialist |
| Production Planner |
| Program Manager - Audit |
| Program Manager - Bay-Delta Initiatives |
| Program Manager - Business Continuity |
| Program Manager - Business Outreach |
| Program Manager - Community Relations |
| Program Manager - Corporate Resources |
| Program Manager - Creative Design |
| Program Manager - Dam Safety Initiatives |
| Program Manager - Emergency Management |
| Program Manager - Engineering |
| Program Manager - Fleet |
| Program Manager - Information Technology |
| Program Manager - Innovation |
| Program Manager - Operations |
| Program Manager - Power Scheduling & Trading |
| Program Manager - Press Office |
| Program Manager - Real Property |
| Program Manager - Regional Recycled Water |
| Program Manager - Safety, Regulatory & Training |
| Program Manager - Water Resource |
| Program Manager - Web |
| Program Manager I |
| Program Manager II |
| Program Manager III |
| Quality Assurance Officer |

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| Real Estate Representative III |
| Resource Specialist |
| Section Manager - Business Outreach |
| Section Manager - Conveyance & Distribution |
| Section Manager - Customer & Community Services |
| Section Manager - Engineering Services |
| Section Manager - Environmental Planning |
| Section Manager - Human Resources |
| Section Manager - Legislative Services |
| Section Manager - Media Services |
| Section Manager - Member Services & Public Outreach |
| Section Manager - Operations Support Services |
| Section Manager - Ops Safety & Regulatory Services |
| Section Manager - Power Operations & Planning |
| Section Manager - Real Property |
| Section Manager - Revenue & Budget |
| Section Manager - Sustainability and Resilience |
| Section Manager - Water Operations & Planning |
| Section Manager - Water Quality |
| Section Manager - Water Resource Management |
| Section Manager - Water Treatment |
| Section Mgr-Equal Employ Opp |
| Senior Administrative Analyst |
| Senior Architect |
| Senior Buyer |
| Senior Crane Certification Technician |
| Senior Cross Connection Technician |
| Senior Deputy Auditor |

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| Senior Deputy General Counsel |
| Senior Deputy General Counsel - Labor Relations |
| Senior Employee Relations Specialist |
| Senior Engineer |
| Senior Engineering Technician |
| Senior Environmental Health & Safety Field Specialist |
| Senior Environmental Specialist |
| Senior Government and Regional Affairs Representative |
| Senior Information Systems Auditor |
| Senior Information Technology Communications Technician |
| Senior Information Technology Project Controls Specialist |
| Senior Lab Information Systems Specialist |
| Senior Legal Technology Specialist |
| Senior Occupational Safety & Health Specialist |
| Senior Project Controls Specialist |
| Senior Real Estate Representative |
| Senior Resource Specialist |
| Senior System Operations Technician |
| Senior System Operator |
| Senior Technical Writer |
| Senior Training Administrator |
| Senior Water Quality Specialist |
| Senior Water Quality Technician |
| Special Assistant to the General Manager |
| Special Projects Manager |
| Staff Assistant to the General Manager |
| Strategic Communication and Policy Advisor |
| Survey & Mapping Technician IV |

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| Team Manager - Admin Services Business Mgt |
| Team Manager - Budget |
| Team Manager - Business Applications |
| Team Manager - Business Intelligence Systems |
| Team Manager - Chemistry |
| Team Manager - Community Relations |
| Team Manager - Construction Contracts |
| Team Manager - Construction Management I |
| Team Manager - Construction Management II |
| Team Manager - Control System Applications |
| Team Manager - Corrosion Control |
| Team Manager - Creative Design |
| Team Manager - Database |
| Team Manager - Design |
| Team Manager - Design Support |
| Team Manager - Design Technology |
| Team Manager - Engineering Administration |
| Team Manager - Engineering Compliance |
| Team Manager - Enterprise Applications |
| Team Manager - Enterprise GIS & CAD |
| Team Manager - Enterprise Water Systems Programs |
| Team Manager - Environmental Planning |
| Team Manager - Environmental Program Support |
| Team Manager - External Affairs Business Management |
| Team Manager - Facilities Planning |
| Team Manager - Facility Operations |
| Team Manager - Field Survey |
| Team Manager - Financial Reporting & Plant Asset |

Team Manager - Geodetics & Mapping

Team Manager - Graphic Design

Team Manager - Health & Safety Program Support

Team Manager - Human Resources Business Support

Team Manager - Hydraulics & System Modeling

Team Manager - Hydroelectric Engineering & Maintenance

Team Manager - Information Security

Team Manager - Internal Controls & Water Inventory

Team Manager - Inventory Control

Team Manager - IT Administration

Team Manager - IT Business Analysis

Team Manager - IT Client Systems Support

Team Manager - IT Network Systems

Team Manager - IT Program Project Support

Team Manager - IT Quality Assurance

Team Manager - IT Service Desk

Team Manager - Laboratory Support

Team Manager - Land Planning & Management

Team Manager - Limnology & Resevoir

Team Manager - Maintenance Engineering

Team Manager - Materials & Metallurgy

Team Manager - Microbiology Compliance

Team Manager - Operations Applications Services

Team Manager - Operations Compliance

Team Manager - Operations Control Center

Team Manager - Operations Planning

Team Manager - Power Operations & Scheduling

Team Manager - Procurement

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| Team Manager - Professional Contracting Services |
| Team Manager - Program Management |
| Team Manager - Project Support |
| Team Manager - Property Management |
| Team Manager - Pump Plant |
| Team Manager - Quality Assurance & Compliance |
| Team Manager - Real Property Business Management |
| Team Manager - Records Management & Imaging Services |
| Team Manager - Reservoir Management |
| Team Manager - Resource Development |
| Team Manager - Resource Planning |
| Team Manager - Right of Way Acquisition |
| Team Manager - Safety & Regulatory Services Site Support |
| Team Manager - Safety of Dams |
| Team Manager - SafetyRegTechTraining |
| Team Manager - Security |
| Team Manager - Server Administration |
| Team Manager - Substructures |
| Team Manager - Supply Acquisition |
| Team Manager - Technical Control |
| Team Manager - Technical Writing |
| Team Manager - Telecommunications |
| Team Manager - Treasury Operations |
| Team Manager - Warehouse |
| Team Manager - Water Efficiency |
| Team Manager - WaterReuse&ProcessDev |
| Team Manager - WRM Business Mgmt |
| Team Manager - WSO Business Mgmt |

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| Team Manager I |
| Team Manager II |
| Team Manager III |
| Team Manager IV |
| Team Manager V |
| Team Manager VI |
| Team Manager VII |
| Training Administrator |
| Treasurer |
| Unit Manager - Application Services |
| Unit Manager - Apprentice & Technical Training |
| Unit Manager - Audit |
| Unit Manager - Benefits Services |
| Unit Manager - Budget |
| Unit Manager - Chemistry |
| Unit Manager - Classification, Compensation & Recruitment |
| Unit Manager - Construction Services |
| Unit Manager - Contracting Services |
| Unit Manager - Conveyance & Distribution |
| Unit Manager - Document Services |
| Unit Manager - Education |
| Unit Manager - Engineering Services |
| Unit Manager - Environmental Planning |
| Unit Manager - Facility Management |
| Unit Manager - Fleet Services |
| Unit Manager - Grants & Research |
| Unit Manager - Implementation Projects & Studies |
| Unit Manager - Imported Supply |

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| Unit Manager - Information Security Services |
| Unit Manager - IT Infrastructure |
| Unit Manager - IT Program Mgmt Office |
| Unit Manager - IT Project Planning |
| Unit Manager - IT Security |
| Unit Manager - Laboratory Services |
| Unit Manager - Land Management |
| Unit Manager - Manufacturing Services |
| Unit Manager - Microbiology |
| Unit Manager - Operations Planning & Programs |
| Unit Manager - Operations Projects & Asset Mgt |
| Unit Manager - Planning & Acquisition |
| Unit Manager - Power & Equipment Reliability |
| Unit Manager - Power Compliance and Programs |
| Unit Manager - Rates Charges & Finance Plan |
| Unit Manager - Reporting |
| Unit Manager - Risk Management |
| Unit Manager - Safety and Environmental Services |
| Unit Manager - Security |
| Unit Manager - System Analysis |
| Unit Manager - System Operations |
| Unit Manager - Water Purification |
| Unit Manager - Water Treatment Plant |
| Workers Compensation Manager |