



Ethics Office Monthly Report

September 2021

INDEPENDENT REVIEW OF EEO RELATED CONCERNS

Continued addressing contract administration duties and follow-up questions from directors and staff regarding the independent review. Coordinated final resolution process for four EEO investigations completed by Shaw Law Group.

COMPLIANCE

Conflict of Interest Code Amendment – Completed the state-mandated comprehensive review of Metropolitan's Conflict of Interest Code (COI Code), which identifies which Metropolitan employees must submit Form 700s and what financial interests they must disclose. The review entailed evaluating all existing job descriptions at the district and determining 1) whether any job titles need to be added to the COI Code and 2) the appropriate level of financial disclosure for each job title.

In consultation with the Fair Political Practices Commission, staff proposed adding new job titles to the COI Code and tailoring disclosure requirements consistent with state regulations. On September 20, 2021, a notice and comment period began for employees to comment on the proposed amendments. Staff will evaluate comments and make additional amendments if necessary. The revised COI Code is expected to take effect by the end of 2021.

Form 700 – Assisted Board members and employees with Assuming Office and Leaving Office Form 700 filings. Assistance

included notifications of deadlines and troubleshooting the electronic filing system. Monitored the status of past due Assuming Office and Leaving Office Form 700 filings; obtained compliance from three former employees and issued past-due notices to three other former employees.

ADVICE/EDUCATION

Addressed nine new advice matters involving: conflicts of interest, gifts, financial disclosure, political activities, gifts, and other ethics-related topics.

Provided a live new filer training session for an employee promoted into a position requiring Form 700 filings.

INVESTIGATIONS

Allegations that a supervisor retaliated against an employee for reporting potential workplace safety violations and other misconduct were not substantiated. The investigation was conducted by an external firm and coordinated with the General Counsel's Office because the allegations also involved non-ethics concerns.

ADVICE AND INVESTIGATIVE DATA

Advice Matters	9
Compliance Assistance	26
Complaints Received	0
Investigations Opened	0
Pending Investigations	2