



Board of Ethics CY 2020 Annual Report

January 1, 2020 - December 31, 2020

Submitted by
Board of Ethics Members:
George Pruden, II, Chair
Steven Hausman, Member
Jeffrey Hysen, Member
Chandria Slaughter, Alternate Member

Prepared by:
Angelique Dorsey White, Esq.
Ethics Officer

Submitted to WSSC Water
Commissioners on 3/30/2021



Washington Suburban Sanitary Commission Annual Ethics Report Calendar Year 2020

Overview

This report covers conflicts of interest matters brought before the Washington Suburban Sanitary Commission (“WSSC Water”) Board of Ethics, financial disclosures, and addresses lobbying activities occurring during Calendar Year 2020 (“CY 2020”). It has been prepared to fulfill the requirements contained in the Maryland Public Ethics Laws, Annotated Code, General Provisions Article §§ 5-823(d) and 5-830(d) and the WSSC Water Code of Ethics Chapter 1.70.140.

The WSSC Water Board of Ethics (“Board”) consists of three regular members and one alternate member who are appointed by WSSC Water’s Commissioners. The members are non-employees who live within the WSSC Water sanitary district. The Board members as of December 31, 2020 were:

Mr. George Pruden, II (Chair),
Dr. Steven Hausman,
Mr. Jeffrey Hysen, and
Ms. Chandria Slaughter (Alternate)¹.

The Board provides non-confidential information to WSSC Water employees, contractors, ratepayers, lobbyists, and other stakeholders through WSSC Water’s public website. The Board pages are accessible through the “Who We Are” heading on the home page (or directly by going to <https://www.wsscwater.com/boe>). This site provides information regarding the Board members, the Board’s areas of responsibility, the Ethics Program at WSSC Water, and contact information for the Ethics Office. Visitors to the page can access various documents including WSSC Water’s Code of Regulation which contains the Code of Ethics, lobbyist registration information, and a list of entities doing business with (or regulated by) WSSC Water. The Board also publishes formal Advisory Opinions, Waiver Request decisions, and Complaint findings on the site.

The Ethics Officer is responsible for directing the day-to-day ethics program for WSSC Water. Ethics Officer Angelique Dorsey White reports functionally to the Board and administratively to WSSC Water’s General Counsel Amanda Stakem Conn. Administrative support is provided by Latonya Allen.

¹ Alternate Board member Chandria Slaughter was appointed to the Board on January 15, 2020.



Meeting Activities

The Board conducted twelve (12) regular meetings in 2020 to address matters within its purview including, but not limited to:

- ◆ Thirteen (13) Complaints;
- ◆ Three (3) Advisory Opinion requests;
- ◆ Changes to WSSC Water’s Code of Ethics (“Code”);
- ◆ Investigations of potential complaints to determine whether to pursue a formal complaint;
- ◆ Annual disclosure statement filings;
- ◆ Lobbyist activities; and
- ◆ Ethics training for WSSC Water employees.

Appendix A summarizes the formal Complaints and Advisory Opinion requests considered in CY 2020. No requests for a Waiver of Code provisions were received during the reporting period.

Lobbyist Reports

A person or organization lobbying WSSC Water is required to register as a lobbyist if there is (1) communication to influence and (2) lobbyist compensation or expenditures meeting or exceeding specified thresholds. (See Code Chapter (“Ch.”) 1.70.380).

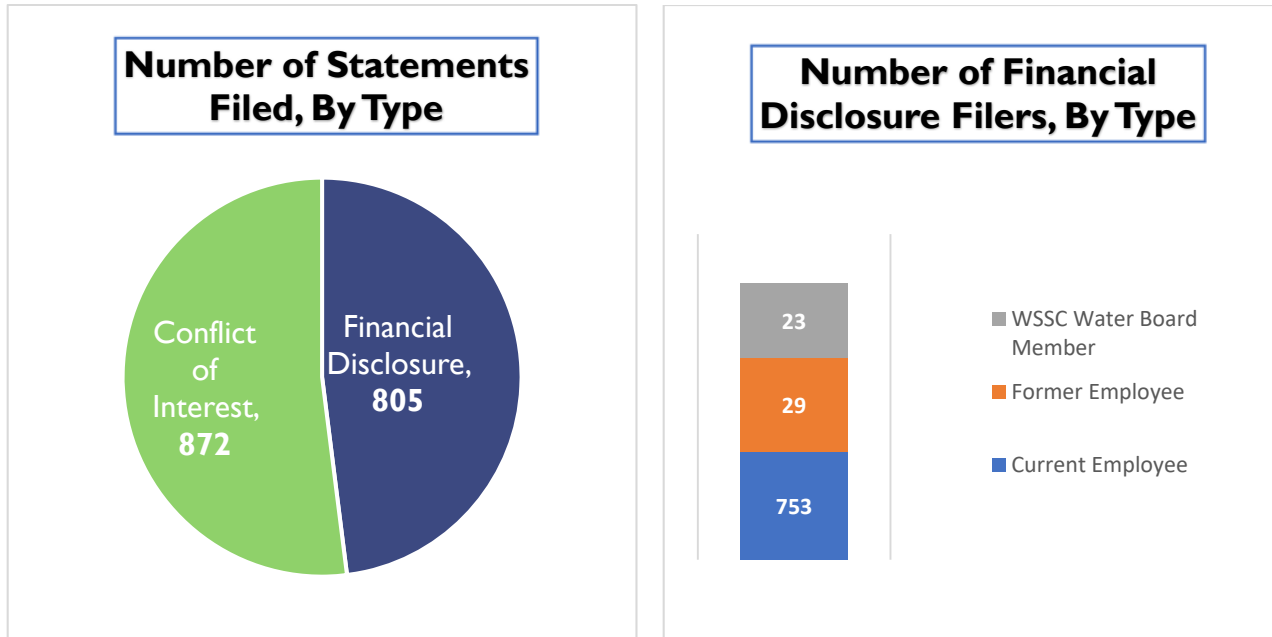
Appendix B summarizes the lobbyist expenditures reported to WSSC Water for CY 2020.

Financial Disclosure and Conflict of Interest Statements

WSSC Water collects information annually from employees to enable it to identify and manage conflicts of interest.

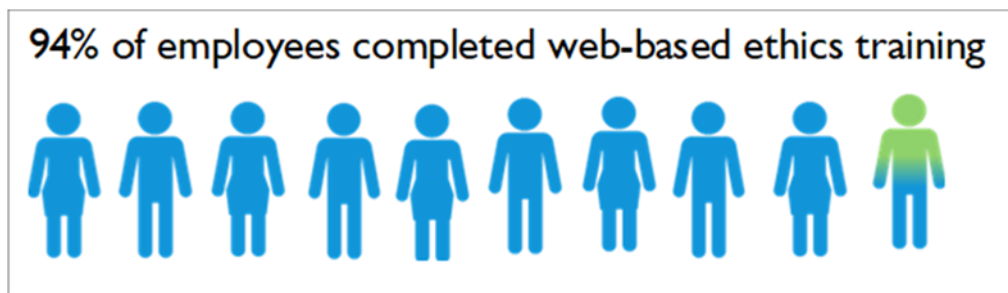
Code Ch. 1.70.330 designates who must file financial disclosure statements annually. Additionally, Code Ch. 1.70.230 states that employees who are not required to file a financial disclosure statement must annually file a conflict of interest statement. In CY 2020, the Ethics Office received a total of 1,677 annual disclosure statements from all filers.

The charts below provide detail regarding the annual disclosure filings.



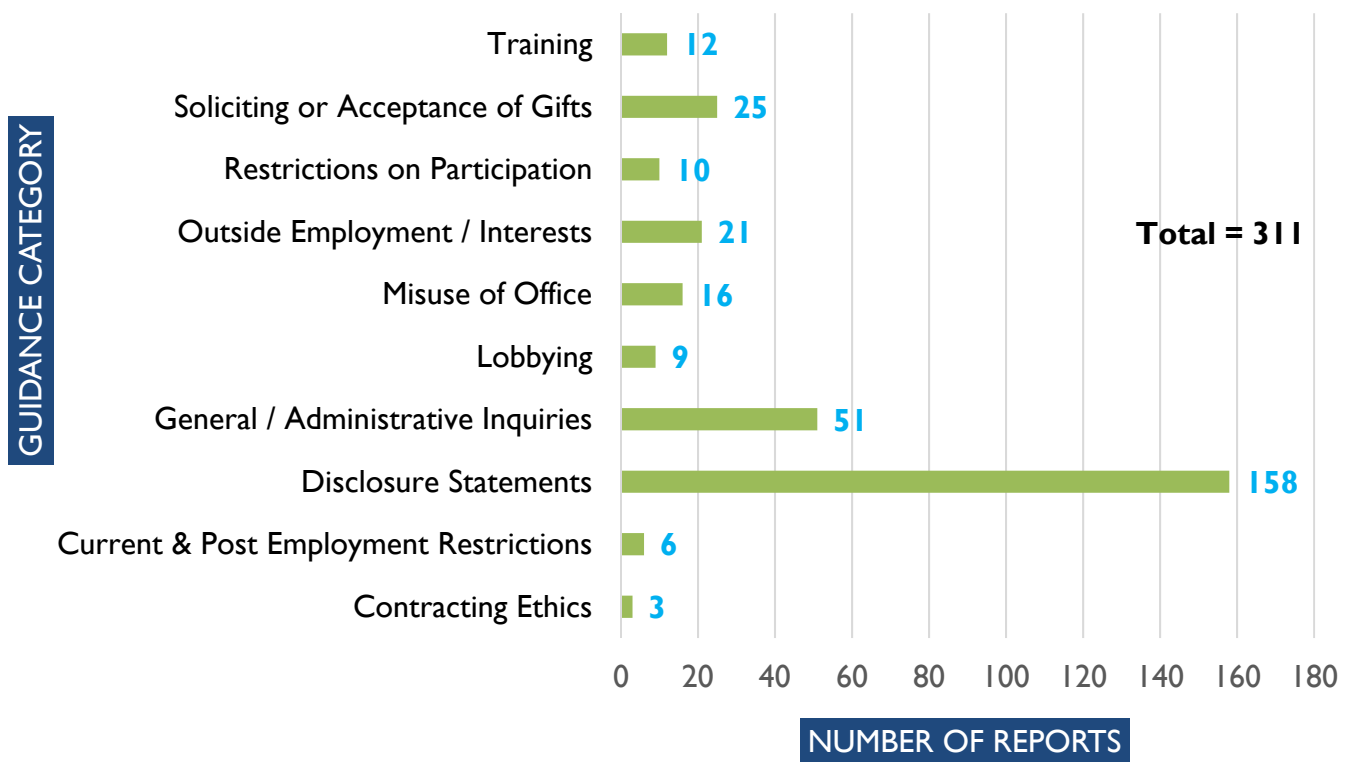
Additional CY 2020 Ethics Program Highlights

- ◆ The Ethics Office provides a web-based training course so that employees can complete the one hour of ethics training required annually in accordance with Code Ch. 1.70.160. In total, 1,525 WSSC Water employees completed the CY 2020 web-based training.



- ◆ In conjunction with Human Resources, the Ethics Officer presented live ethics training to 108 new employees during the onboarding process.
- ◆ WSSC Water’s Ethics Office served as the primary point of contact for all ethics concerns and, under the general oversight of the Board, provided informal advice on 311 ethics inquiries. The chart below contains a breakdown of the topics covered.

CY 2020 ETHICS OFFICE GUIDANCE SUMMARY



**CY 2020
WSSC BOARD OF ETHICS MATTERS**

ADVISORY OPINION REQUESTS

| Matter No. | Matter Summary | WSSC Code of Ethics Provision(s) Referenced | Resolution/Status |
|-------------------|---|--|--|
| A-19-01 | A WSSC Water employee requested an Advisory Opinion regarding whether having shares in the Employee Stock Option Plan of a former employer (who does business with WSSC Water) restricts the employee from participating in matters involving the former employer. | Ch. 1.70.170 | Advisory Opinion # A-19-01 published on the Board of Ethics website. |
| A-20-01 | A senior manager requested guidance on whether the Code of Ethics allowed WSSC to use a rider available in an existing contract issued by another government agency to procure services when the awardee had previously completed related work on another contract. | Ch. 1.70.270 | Advisory Opinion # A-20-01 published on the Board of Ethics website. |
| A-20-02 | A senior manager requested guidance on whether the Code of Ethics prohibits consultants who are currently working on projects in a WSSC business unit from serving as evaluators on review panels for WSSC solicitations. | Chs. 1.70.270; 1.70.280 | Pending. |

**CY 2020
WSSC BOARD OF ETHICS MATTERS**

COMPLAINTS

| Matter No. | Matter Summary | WSSC Code of Ethics Provision(s) Referenced | Resolution/Status |
|-------------------|--|---|---|
| C-19-09 | A former WSSC employee was alleged to have failed to file a required final financial disclosure statement upon separation from the Commission. | Ch. 1.70.340(c) | Complaint Opinion # C-19-09 issued and a summary of the decision is located on the Board of Ethics website. |
| C-19-10 | A former WSSC employee was alleged to have failed to file a required final financial disclosure statement upon separation from the Commission. | Ch. 1.70.340(c) | Complaint dismissed after the respondent cured the alleged violation by filing the final financial disclosure statement. |
| C-19-11 | A former WSSC employee was alleged to have failed to file a required final financial disclosure statement upon separation from the Commission. | Ch. 1.70.340(c) | Complaint dismissed after the respondent cured the alleged violation by filing the final financial disclosure statement. |
| C-20-01 | A former WSSC employee was alleged to have failed to file a required final financial disclosure statement upon separation from the Commission. | Ch. 1.70.340(c) | Complaint dismissed after the respondent cured the alleged violation by filing the final financial disclosure statement. |
| C-20-02 | A former WSSC employee was alleged to have failed to file a required final financial disclosure statement upon separation from the Commission. | Ch. 1.70.340(c) | Complaint dismissed after the respondent cured the alleged violation by filing the final financial disclosure statement. |
| C-20-03 | A former WSSC employee was alleged to have failed to file a required final financial disclosure statement upon separation from the Commission. | Ch. 1.70.340(c) | Complaint dismissed after the respondent cured the alleged violation by filing the final financial disclosure statement. |
| C-20-04 | A former WSSC employee, a bidder on a solicitation, and a proposed subcontractor to the bidder were alleged to have violated various provisions of the Code of Ethics based on the former employee's involvement in WSSC's evaluation of the solicitation. | Chs. 1.70.170(a); 1.170.180(a); 1.70.180(b); 1.70.190(a); 1.70.190(b); 1.70.200(f); 1.70.210; 1.70.260(a)(3); 1.70.270(a); 1.70.290(a) | The Board entered into settlement agreements with the former employee and proposed subcontractor; summaries of these agreements are located on the Board of Ethics website. Complaint dismissed as to the bidder due to lack of evidence that the bidder had violated the Code of Ethics. |

**CY 2020
WSSC BOARD OF ETHICS MATTERS**

COMPLAINTS

| Matter No. | Matter Summary | WSSC Code of Ethics Provision(s) Referenced | Resolution/Status |
|-------------------|--|--|--|
| C-20-05 | A former WSSC employee was alleged to have failed to file a required final financial disclosure statement upon separation from the Commission. | Ch. 1.70.340(c) | Complaint dismissed after the respondent cured the alleged violation by filing the final financial disclosure statement. |
| C-20-06 | A former WSSC employee was alleged to have failed to file a required final financial disclosure statement upon separation from the Commission. | Ch. 1.70.340(c) | Complaint dismissed after the respondent cured the alleged violation by filing the final financial disclosure statement. |
| C-20-07 | Two managers were alleged to have misused the contracting process to hire close associates. | Chs. 1.70.020; 1.70.200 | Pending. |
| C-20-08 | An employee was alleged to have inspected the work of a qualifying relative. | Ch. 1.70.170(a) | Pending. |
| C-20-09 | Community members alleged that WSSC engaged in unethical practices related to the advanced metering infrastructure (AMI or "smart meters") proposal process. | Chs. 1.70.010; 1.70.020 | Complaint dismissed for lack of reasonable cause to believe that respondents had violated the Code of Ethics. |
| C-20-10 | A lobbyist was alleged to have failed to submit a required lobbyist activity report. | Ch. 1.70.420(a)(1) | Pending. |

CY 2020
WSSC BOARD OF ETHICS MATTERS

WAIVER REQUESTS

No requests submitted.

CY 2020 WSSC LOBBYIST ACTIVITY REPORT

| | LOBBYIST | COMPANY | DATE OF REGISTRATION | REPORTING PERIOD | | Total |
|--|------------------|---|-------------------------|------------------------------|------------------------------|-------------------|
| | | | | 01/01/20 thru 06/30/20 | 07/01/20 thru 12/31/20 | |
| 1 | Erin Bradley | Apartment and Office Building Association of Metropolitan Washington | 2/10/2020 | \$0.00 | \$0.00 | \$0.00 |
| 2 | Nicola Whiteman | Apartment and Office Building Association of Metropolitan Washington | 1/21/2015 | \$0.00 | \$0.00 | \$0.00 |
| 3 | Justin Ross | CCE, Inc (Cafritz) | 2/21/2020 | \$0.00 | \$0.00 | \$0.00 |
| | | EYA, LLC | 2/21/2020 | \$500.00 | \$500.00 | \$1,000.00 |
| 4 | Brad Frome | CCE, Inc (Cafritz) | 2/21/2020 | \$0.00 | \$0.00 | \$0.00 |
| | | EYA, LLC | 2/21/2020 | \$500.00 | \$500.00 | \$1,000.00 |
| | | Sheild Investments | 2/21/2020 | \$0.00 | \$0.00 | \$0.00 |
| 5 | Davion Percy | Sensus USA | 4/17/2018 | \$0.00 | \$0.00 | \$0.00 |
| 6 | Steven Silverman | 8600 Georgia LLC | 10/21/2019 | \$0.00 | \$0.00 | \$0.00 |
| Total Compensation and Expenses | | | | \$1,000.00 | \$1,000.00 | \$2,000.00 |