



Board of Ethics CY 2021 Annual Report

January 1, 2021 - December 31, 2021

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

Prepared by:
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Ethics Officer

Submitted to WSSC Water
Commissioners on 3/30/2022



Washington Suburban Sanitary Commission Annual Ethics Report Calendar Year 2021

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 2021 (“CY 2021”). 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, 2021 were:

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

The Board provides non-confidential information to WSSC Water employees, contractors, ratepayers, lobbyists, and other stakeholders through WSSC Water’s public website. These 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.

Meeting Activities

The Board conducted twelve (12) regular meetings in 2021 to address matters within its purview including, but not limited to:

- ◆ Twelve (12) Complaints;
- ◆ Two (2) Advisory Opinion requests;
- ◆ Obtained changes to WSSC Water’s Code of Ethics (“Code”), including assessing a fee for filing a financial disclosure statement late and requiring approval prior to employees engaging in outside (i.e., secondary) employment;
- ◆ 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 2021. 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 1.70.380).

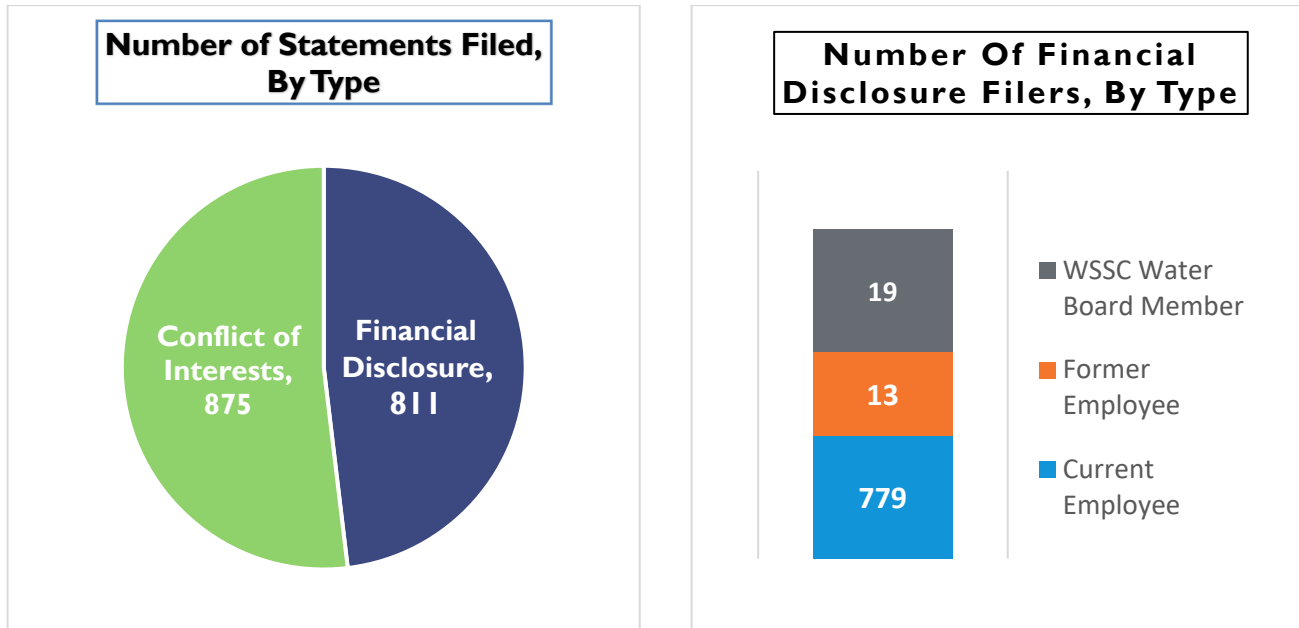
Appendix B summarizes the lobbyist expenditures reported to WSSC Water for CY 2021.

Financial Disclosure and Conflict of Interest Statements

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

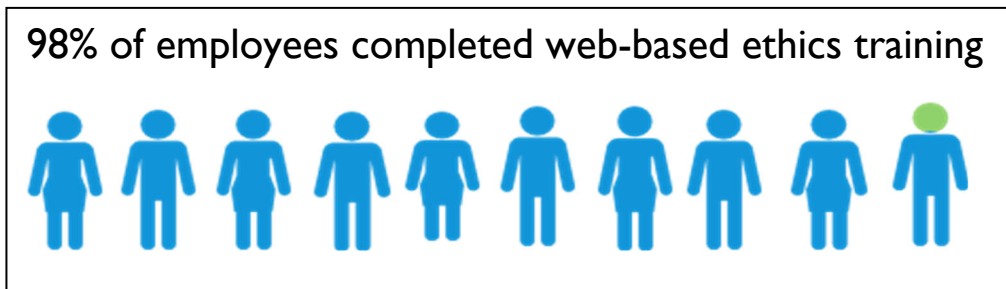
Code Ch. 1.70.330 designates who must file financial disclosure statements annually. Additionally, Code Ch. 1.70.230 states that employees who are not required to file a financial disclosure statement must annually file a conflict of interest statement. In CY 2021, the Ethics Office received a total of 1,686 annual disclosure statements from all filers.

The charts below provide detail regarding the annual disclosure filings.

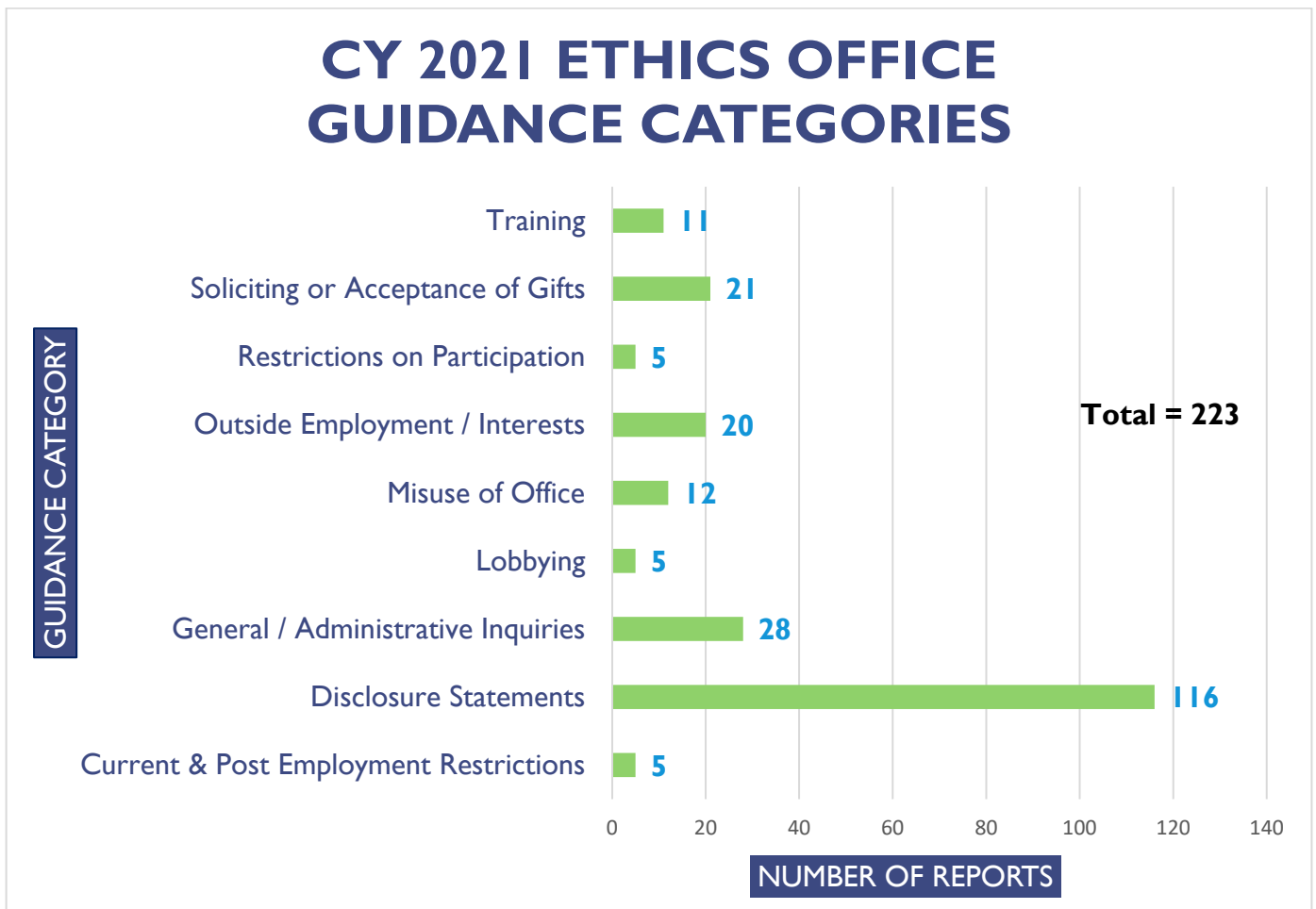


Additional CY 2021 Ethics Program Highlights

- ◆ 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, 1,600 WSSC Water employees completed the CY 2021 web-based training.



- ◆ In conjunction with Human Resources, the Ethics Officer presented live ethics training to 144 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 223 ethics inquiries. The chart below contains a breakdown of the topics covered.



**CY 2021
WSSC BOARD OF ETHICS MATTERS**

ADVISORY OPINION REQUESTS

Matter No.	Matter Summary	WSSC Code of Ethics Provision(s) Referenced	Resolution/Status
A-20-01	A senior manager requested guidance on whether the Code of Ethics allowed WSSC Water 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.	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	Advisory Opinion # A-20-02 published on the Board of Ethics website.

**CY 2021
WSSC BOARD OF ETHICS MATTERS**

COMPLAINTS

Matter No.	Matter Summary	WSSC Code of Ethics Provision(s) Referenced	Resolution/Status
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.	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.
C-20-07	Two managers were alleged to have misused the contracting process to hire close associates.	1.70.020; 1.70.200	Pending as to Manager #1. The Board entered into a settlement agreement with Manager #2; a summary of the agreement is located on the Board of Ethics website.
C-20-08	An employee was alleged to have inspected the work of a qualifying relative.	1.70.170(a)	The Board entered into a settlement agreement with the employee; a summary agreement is located on the Board of Ethics website.
C-20-10	A lobbyist was alleged to have failed to submit a required lobbyist activity report.	1.70.420(a)(1)	Complaint dismissed after the respondent cured the alleged violation by filing the lobbyist activity report.
C-21-01	An employee was alleged to have bullied another employee for engaging in political activity.	1.70.200(e)	Complaint dismissed for lack of reasonable cause to believe that the respondent had violated the Code of Ethics.
C-21-02	An employee was alleged to have engaged in inappropriate communications with a potential bidders on a WSSC solicitation.	1.70.290(a); 1.70.290(b)	Complaint dismissed for lack of reasonable cause to believe that the respondent had violated the Code of Ethics.
C-21-03	A manager was alleged to have instructed a subordinate to violate the Code of Ethics restrictions on participation.	1.70.200(f)	Complaint Opinion # C-21-03 issued; decision posted on the Board of Ethics website.

**CY 2021
WSSC BOARD OF ETHICS MATTERS**

**COMPLAINTS
(Continued)**

Matter No.	Matter Summary	WSSC Code of Ethics Provision(s) Referenced	Resolution/Status
C-21-04	A former WSSC employee was alleged to have failed to file a required final financial disclosure statement upon separation from the Commission.	1.70.340(c)	Complaint dismissed after the respondent cured the alleged violation by filing the final financial disclosure statement.
C-21-05	A former WSSC employee was alleged to have failed to file a required final financial disclosure statement upon separation from the Commission.	1.70.340(c)	Complaint dismissed after the respondent cured the alleged violation by filing the final financial disclosure statement.
C-21-06	An employee was alleged to have used WSSC equipment and work time to solicit for a fundraiser that was not approved by the General Manager.	1.70.220(a)(2) and 1.70.220(b)(1)	Pending.
C-21-07	A WSSC customer alleged that WSSC engaged in unethical practices related to estimated billing.	1.70.020	The Board voted to dismiss the complaint pursuant to Code Chapter 1.70.080(a)(3) for failure to allege facts sufficient to state a violation of the Code of Ethics.

CY 2021
WSSC BOARD OF ETHICS MATTERS

WAIVER REQUESTS

No requests submitted.

CY 2021 WSSC LOBBYIST ACTIVITY REPORT

	LOBBYIST	COMPANY	DATE OF REGISTRATION	REPORTING PERIOD		Total
				01/01/21 thru 06/30/21	07/01/21 thru 12/31/21	
1	Erin Bradley	Apartment and Office Building Association of Metropolitan Washington	2/10/2020	\$0.00	\$0.00	\$0.00
2	Nicola Whiteman (Terminated 01/31/22)	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	\$0.00	\$200.00	\$200.00
4	Brad Frome	CCE, Inc (Cafritz)	2/21/2020	\$0.00	\$0.00	\$0.00
		EYA, LLC	2/21/2020	\$0.00	\$200.00	\$200.00
		Sheild Investments	2/21/2020	\$0.00	\$0.00	\$0.00
5	Davion Percy (Terminated 03/03/21)	Sensus USA	4/17/2018	\$0.00	\$0.00	\$0.00
Total Compensation and Expenses				\$0.00	\$400.00	\$400.00

Appendix B
CY 2021 WSSC Board of Ethics Annual Report
Submitted on March 30, 2022