



Board of Ethics CY 2019 Annual Report

January 1, 2019 - December 31, 2019

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 4/10/2020



Washington Suburban Sanitary Commission Annual Ethics Report Calendar Year 2019

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 2019 (“CY 2019”). 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 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. Alternate Board member Lorielle Pankey ended her service to WSSC Water on May 18, 2019. No alternate member was appointed during the reporting period.¹ The Board members as of December 31, 2019 were:

Mr. George Pruden, II (Chair),
Dr. Steven Hausman, and
Mr. Jeffrey Hysen.

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 “About Us” tab on the home page (found at <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 Regulations 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.

WSSC Water has established an Ethics Officer position to direct the day-to-day ethics program. 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 The Board of Commissioners appointed Chandria Slaughter to fill the Alternate Board Member vacancy at its January 15, 2020 meeting.



Meeting Activities

The Board conducted twelve (12) regular meetings in 2019 to address matters within its purview including, but not limited to:

- ◆ Twelve (12) Complaints;
- ◆ One (1) Advisory Opinion request;
- ◆ 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 2019. 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).

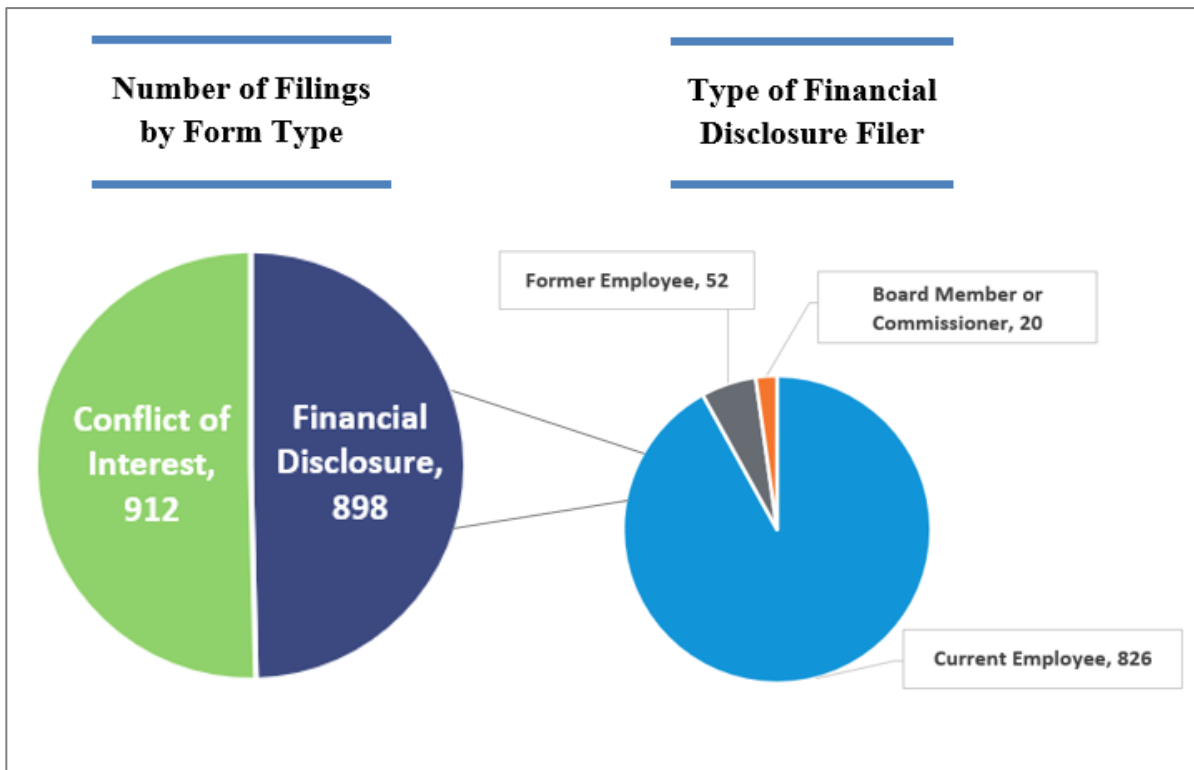
Appendix B summarizes the lobbyist expenditures reported to WSSC Water for CY 2019.

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 2019, the Ethics Office received a total of 1,810 annual disclosure statements from all filers.

The chart below provides detail regarding the annual disclosure filings.

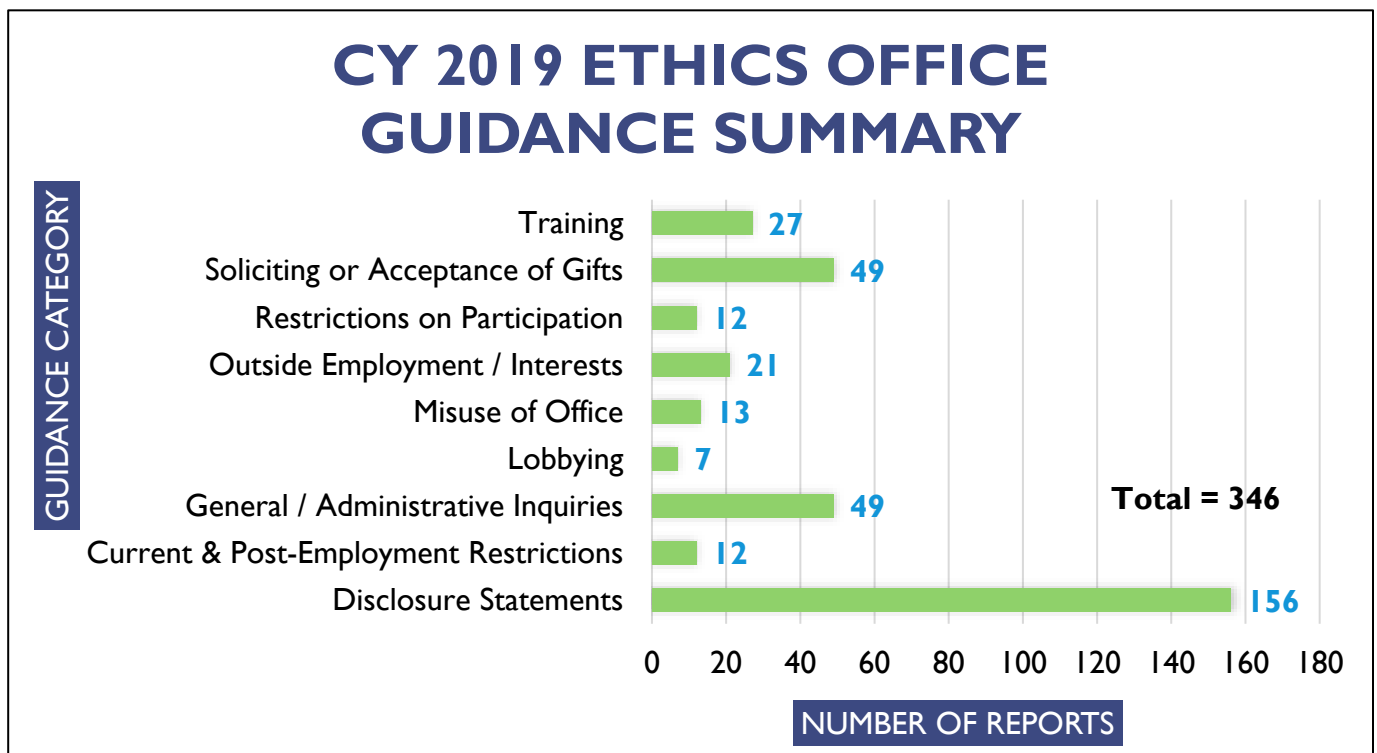


Additional CY 2019 Ethics Program Highlights

- ◆ 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, 1,623 WSSC Water employees completed the CY 2019 web-based training.



- ◆ In conjunction with Human Resources, the Ethics Officer presented in-person ethics training to 162 employees during New Employee Orientation.
- ◆ 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 346 ethics inquiries. The chart below contains a breakdown of the topics covered.



CY 2019
WSSC WATER BOARD OF ETHICS MATTERS

ADVISORY OPINIONS

Matter No.	Matter Summary	WSSC Water Code of Ethics Provision	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 on matters involving the former employer.	Ch. 1.70.170	Pending.

CY 2019
WSSC WATER BOARD OF ETHICS MATTERS

COMPLAINTS

Matter No.	Matter Summary	WSSC Water Code of Ethics Provision	Resolution/Status
C-18-02	A WSSC employee was alleged to have participated in matters involving a vendor that employed a qualifying relative.	Ch. 1.70.170	The Board and the employee entered into a settlement agreement, a summary of which is located on the Board of Ethics website.
C-19-01	A former WSSC Water employee was alleged to have failed to file a required final financial disclosure statement upon separation from the Commission.	Ch. 1.70.340	Complaint dismissed after the Board determined that it did not merit further proceedings.
C-19-02	A WSSC Water employee was alleged to have misused his/her office for the personal benefit of a family member.	Ch. 1.70.200	Complaint dismissed after the Board reviewed the preliminary report and determined that it did not merit further proceedings.
C-19-03	A former WSSC Water employee was alleged to have failed to file a required final financial disclosure statement upon separation from the Commission.	Ch. 1.70.340	Complaint dismissed after the respondent cured the alleged violation by filing the final financial disclosure statement.
C-19-04	A former WSSC Water employee was alleged to have failed to file a required final financial disclosure statement upon separation from the Commission.	Ch. 1.70.340	Complaint dismissed after the respondent cured the alleged violation by filing the final financial disclosure statement.
C-19-05	A former WSSC Water employee was alleged to have failed to file a required final financial disclosure statement upon separation from the Commission.	Ch. 1.70.340	Complaint dismissed after the respondent cured the alleged violation by filing the final financial disclosure statement.

CY 2019
WSSC WATER BOARD OF ETHICS MATTERS
COMPLAINTS

Matter No.	Matter Summary	WSSC Water Code of Ethics Provision	Resolution/Status
C-19-06	A former WSSC Water employee was alleged to have failed to file a required final financial disclosure statement upon separation from the Commission.	Ch. 1.70.340	Complaint dismissed after the Board determined that it did not merit further proceedings.
C-19-07	A WSSC Water bidder was alleged to have received restricted information regarding a procurement prior to the award of the contract.	Ch. 1.70.260	Complaint dismissed after the Board reviewed the preliminary report and determined that it did not merit further proceedings.
C-19-08	A WSSC employee was alleged to have participated in matters involving a vendor in which the employee held an interest.	Ch. 1.70.170	Complaint dismissed after the Board reviewed the preliminary report and determined no Code of Ethics violation occurred.
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	Pending.
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	Pending.
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	Pending.

CY 2019
WSSC WATER BOARD OF ETHICS MATTERS

WAIVER REQUESTS

No requests submitted.

CY 2019 WSSC LOBBYIST ACTIVITY REPORT

	<i>LOBBYIST</i>	<i>COMPANY</i>	<i>DATE OF REGISTRATION</i>	REPORTING PERIOD		Total
				01/01/19 thru 06/30/19	07/01/19 thru 12/31/19	
1	Ronald Wineholt	Apartment and Office Building Association of Metropolitan Washington	10/15/2012	\$0.00	N/A*	\$0.00
2	Nicola Whiteman	Apartment and Office Building Association of Metropolitan Washington	1/21/2015	\$0.00	\$0.00	\$0.00
3	Davion Percy	Sensus USA		\$0.00	\$0.00	\$0.00
4	Steven Silverman	8600 Georgia LLC	10/21/2019	N/A*	\$15,000.00	\$15,000.00
Total Compensation and Expenses				\$ -	\$15,000.00	\$15,000.00

*N/A: Not active during the reporting period

Appendix B
CY 2019 WSSC Water Board of Ethics Annual Report
Submitted on April 10, 2020