

Date: July 13, 2022

To: Honorable Members of the Ethics Commission

From: Julian Cernuda, Assistant to the City Manager

Subject: **Ethics Commission Action Plan Update**

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The Ethics Commission (Commission) requested that staff update the Commission's Action Plan (Plan) periodically and to bring the Plan back to the Commission.

The Plan (Attachment A) contains staff updates in green in the "Notes/Next Steps" column. Timeline adjustments were also made and are shown in blue in the "Timeline Priority" column. The Action Plan Deliverables Timeline – Anticipated Monthly Schedule (Attachment B) has also been updated and includes the Plan Workstream deliverable assignment for reference.

If you have any questions, please contact me at (562) 570-6154.

ATTACHMENTS

A – ETHICS COMMISSION ACTION PLAN  
B – ACTION PLAN DELIVERABLES TIMELINE ANTICIPATED MONTHLY SCHEDULE

CC: APRIL WALKER, ADMINISTRATIVE DEPUTY CITY MANAGER  
HEATHER VAN WIJK, ETHICS OFFICER  
TAYLOR ANDERSON, DEPUTY CITY ATTORNEY  
JT NAGAYAMA, CITY CLERK ANALYST

**CITY OF LONG BEACH ETHICS COMMISSION  
DRAFT ACTION PLAN 3.24.21- Updated 7.13.22**

\*Capstone Recommendations are indicated in blue

\* Deliverables updates in green

Workstream	Deliverable	Timeline Priority*	Audit Ref.	Additional Budget Needed	Authority / Additional Authority Needed	Notes / Next Steps
<b>Ethics Office Structure &amp; Staff</b>						
1.1.	Assess/Propose <b>Roles and Responsibilities:</b> Structure, Staffing, Leadership and Reporting	Q4 FY21	<a href="#">Rec. #1</a> (p. 13)	Need budget analysis then EC makes recommendation to Mayor and City Council delegates authority to EC	2,3,4/No	<p>Where within the city should the Ethics Commission report? City Manager? Define relationship between Commission and City Manager. How should the Ethics Commission be organized? Should there be an Ethics Office under the Commission? Should the Ethics Commission/Office be supported by a dedicated director? What is the optimal size of the Ethics Commission/Office Staff?</p> <p>The Ethics Commission provides recommendations on policy direction pertaining to the City Ethics Program. The Commission is supported by the City Manager’s Office, lead department, and the City Attorney’s Office and City Clerk’s Office. <b>The Ethics Officer (EO) joined the team in April 2022.</b></p> <p><b>The City Attorney’s Office provided direction on how to make recommendations to departments on April 13, 2022.</b></p>
1.2.	Publish <b>Annual Report</b> on Ethics in the City with achievements of the EC in the past year	Q2 Annual	<a href="#">Rec. #3</a> (p. 14); <a href="#">Rec. #10</a> , (p. 30)	No	3,4/No	<p>A 2020 Annual Report was published in early 2021. A 2021 Annual Report was published in March of 2022.</p>

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1.3.	Establish a <b>Values Statement</b> for Ethics Commission	Q3 FY21	<a href="#">Rec. #5</a> (p. 18-19)	No	1,2,3,4,5/No	<p>The Commission has established the following values:</p> <ul style="list-style-type: none"> <li>• Accountability—the willingness to accept responsibility and account for one’s actions.</li> <li>• Equity – ensuring fairness and due process</li> <li>• Impartiality—loyalty to the public good.</li> <li>• Diversity—embracing histories, values, and ideas from all backgrounds, and recognizing their contribution to improving the City’s operations, services, and programs.</li> <li>• Transparency—policies and procedures that are open to public observation and scrutiny.</li> <li>• Integrity—the practice of being truthful, seeking truth, and adherence to the City’s values.</li> </ul>
1.4.	Compile and Issue <b>QuarterlyAnnual Ethics Reports</b>	Q4 <del>2</del> FY22 then <del>annually</del> quarterly	<a href="#">Rec. #10</a> (p. 30)	No	1,2,3,4/Yes	<p>City auditor to present annual fraud report to EC when ready. <del>Annual</del>Quarterly reports to include City Auditor hotline and cases handled through other channels and Hotline metrics. Additional authority required to access Corrective Action Matrix for auditor findings and results of other City conducted Ethics investigations. Need to determine what else should be reported to EC and the public periodically.</p> <p>In September 2021, the City Auditor presented on the case handling process and provided a report on the Fraud Hotline aimed to deter, detect, and disclose fraud within the City. <b>Staff recommends an annual report to align with the City Auditor’s Annual Hotline Report on Fraud, Waste, and Abuse.</b></p>
<b>Ethics Resources</b>						
2.1.	Develop and Deploy <b>Ethics</b>	Q1 <del>2</del> FY23 <del>2</del> Then maintain	<a href="#">Rec. #3</a> (p. 14)	No	3,4/No	Create/revamp digital home for all ethics and policy resources for City employees. Consider e-blast to

Workstream	Deliverable	Timeline Priority*	Audit Ref.	Additional Budget Needed	Authority / Additional Authority Needed	Notes / Next Steps
	<b>Media Site with resources for City Employees</b>					<p>employees re availability of resources. Site will be available to the public.</p> <p>Staff has created a <a href="#">Disclosure Reports and Ethics Portal</a> webpage that brings together various reporting resources and forms for the public, staff, and elected officials to access with ease.</p> <p>The media site with staff resources will be built with initial launch of the 30-minute ethics training. Expected website launch will be coordinated with training rollout. Work will also continue to be ongoing as new training is developed.</p>
2.2.	Develop and Deploy <b>Ethics Media Site with additional resources intended for the Public</b>	Q <del>23</del> FY2 <del>32</del> Then maintain	<a href="#">Rec. #6</a> (p. 21) <a href="#">Rec. #7</a> (p. 24)	No	3,4/No	<p>Create/revamp digital home for ethics resources for public.</p> <p>Staff has created a <a href="#">Disclosure Reports and Ethics Portal</a> webpage that brings together various reporting resources and forms for the public, staff, and elected officials to access with ease.</p> <p>This work, along with reviewing ethics resources on the Intranet (staff portal), is ongoing.</p>
2.3.	Develop “ <b>Code of Conduct</b> ” for city officials and staff (all departments)	Q <del>43</del> FY2 <del>24</del> (to <del>begin process for</del> <del>adoption</del> send to Council)	<a href="#">Rec. #5</a> (p. 18-19)	No	1,2,3,4,5/No	<p>Research model versions of other municipalities. Code to communicate a definition of “Ethics” for LB (Audit Rec. #6; p. 21) Consult with the City Attorney and City Manager to ensure Code is in sync with existing City policies. Goal is to establish clear expectations for all City officials, employees, and the public. See Item 2.5 for timeline to adoption.</p> <p>Define what ethics means in simple terms, on an individual level, as part of a definition that aligns with the organization’s mission, values, and code.</p> <p>Use the definition to create an ethics-related motto.</p>

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						<p>Update the Code to include the new definition.</p> <p>The Code continues to be in the Meet and Confer process as staff continues to work with HR and the remaining bargaining organization to address concerns. The Code will then return to the Commission as a receive and file as a future agenda item.</p>
2.4.	Create comprehensive <b>Companion Document to the Ethics Code</b> to replace current "Ethics Guide"	Q12 FY232	<a href="#">Rec. #3</a> , <a href="#">Rec #4</a> (pp. 14-16)	No	1,2,3,4,5/No	<p>Document to include citation to source regulations, policies, and procedures. Collaborate with City Attorney, City Auditor, Human Resources, and City Manager as needed. New ethics documents should include: Current Ethics Guide information; Information on pathways to report alleged violations; method(s) to obtain additional information and advice on ethics issues; anti-retaliation protection policy; reference to any additional adopted ethics policies, ordinances, and regulations</p> <p>Update the City's Ethics Handbook, under the name "Ethics Regulations" and only include legal requirements and policies.</p> <p>The Commission has been and will continue to review pertinent City policy to provide recommendations to staff. This work will also draw from the recommendations provided by the Ethics Capstone Team to ensure alignment with the City's ethics educational program. Work is ongoing.</p>
2.5.	<b>Implement new Code and Guide</b> to all City Employees	Q43 FY22		No	1,2,3,4,5/Yes	Collaborate with the City Manager and Human Resources regarding implementation. Function as subject matter experts in any dialogue with unions as may be necessary. Communicate with City Council and semi-independent Commissions

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						<p>(Harbor, etc.); work with non-City Manager departments to obtain buy-in and adoption of new ethics document; time issuance with bargaining unit negotiations. Submit final Code to City Council for adoption and work with City Attorney to draft communication re expectations around adherence to Code of Ethics.</p> <p>The Guide awaits completion of foundation deliverables. The Code is awaiting the conclusion of the Meet and Confer process and will be included as part of the 30-minute ethics training.</p>
2.6.	Develop <b>Supplier Code of Conduct</b>	Q4 FY22	<a href="#">Rec. #16</a> (p. 34); <a href="#">Rec #18</a> (p. 34)	No	1,2,5/No	<p>Assess current requirements, standards and policies applicable to procurement and contracts and incorporate into useful document for vendor employees. Consider financial disclosures by consultants involved in decision making positions. Work with City Manager.</p> <p>Financial Management staff presented on the current procurement process and Supplier's Code work in February 2022. Procurement and Commission support staff will draft a Supplier's Code and return to the Commission with a draft for feedback by Q4 of FY 2022.</p>
2.7.	Review, consolidate, and modify (if appropriate) <b>Anti-Retaliation Protection Policy</b> , as needed	Q1 FY22 (for final draft to begin process for adoption if substantive changes recommended )	<a href="#">Rec. #20</a> (p. 39)	No	1,2,3/No	<p>Human Resources presented on these policies to the Commission in March 2022. This item is now complete.</p>
2.8.	Establish process to provide <b>Advice and Information</b>	Q1 FY23	<a href="#">Rec. #8</a> (p. 26)	Yes	1,2,3,4/No	Website and/or anonymous email / phone.

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	to City employees and the public on Ethics related Issues					Place all ethics-related documents online for transparency and accessibility.  Staff has identified a potential vendor to launch the Ethics Helpline and is currently working with the City Auditor's Office to understand how the Fraud, Waste, and Abuse Hotline and the Ethics Helpline can complement one another to serve staff. The Ethics Helpline is expected to launch by October 2022.
2.9.	Review, consolidate, and propose modification or update, if needed, <b>Conflict of Interest</b> policies	Q <del>2</del> <sup>4</sup> FY <del>23</del> <sup>2</sup> (for final draft to begin process for adoption of any recommended changes)	<a href="#">Rec. #5</a> (p. 18-19; <a href="#">Rec. #13</a> (p. 33)	Yes	1,2,5/Yes	Review process for oversight of outside employment by City employees; Develop a policy for adoption by the City Council requiring certification of absence of conflict at each City Council meeting (Audit Rec. #13; p. 33). Advocate / obtain compliance by non-CM departments.  City Attorney's Office will provide initial Conflict of Interest information to the Commission in July 2022 and follow up with an additional presentation in August 2022.
2.10.	Require that newly elected officials and City staff sign <b>Disclosure of Any Members of Their Immediate Family on Staff with the City</b>	Q4 FY22	<a href="#">Rec. #14</a> (p. 34)	No	1,2/No	Draft amendment to Policy 32-1 and submit for adoption. (Does City Manager have authority to change <a href="#">administrative regulation</a> or must this go to City Council?). Recommend process for monitoring.  Human Resources has requested additional time for this item. A presentation is now anticipated for July or August 2022.
2.11.	<b>Create an Ethics Motto</b>	TBD	N/A		No	Discuss best approach to create motto. Ensure that City staff has ownership over motto.  The EO has created a survey that will be sent out Citywide via email by Tom Modica in July 2022 asking for suggestions by City staff. The next step

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						would be to take the top 5 suggestions to EC for input, then send out the final 2-3 Citywide for a vote.
<b>Engagement &amp; Outreach</b>						
3.1.	Integrate Ethics Program language clearly in <b>City's Municipal Code</b> ; draft language and identify where in Municipal code to insert	<a href="#">Ongoing (case-by-case) Q3 FY23</a>	<a href="#">Rec. #5</a> (pp. 18-19)	No	1,2,3,4,5/ Need approval of the changes	<p>Identify best practices. May include: City's ethics principles; high-level rules and regulations; specification that Program covers City elected, appointed officials, and City employees, including those that do not report to the City Manager. Language of the City's broad ethical values. Specific requirements pertaining to: Campaign finance; Lobbying; Conflict of Interest; Anti-corruption; Governmental Ethics.</p> <p><a href="#">The City Attorney's Office actively provides guidance on the most effective manner to incorporate emerging ethics recommendations on a case-by-case basis.</a></p>
3.2.	Create <b>Ethics Training Program</b> based on Code of Conduct, plan roll-out, and oversee deployment. Provide tracking / reporting mechanism for compliance oversight	Q4 FY22	<a href="#">Rec. #12,</a> <a href="#">Rec. #19</a> (pp. 33 & 37)	Yes	1/No	<p>Annual training specifically targeted for Elected &amp; Appointed; Leaders; all others. To include tracking of mandatory sexual harassment prevention training. Support from Human Resources and other departments will be needed.</p> <p><a href="#">Design a training that is no more than 30 minutes in length, with content that is engaging and inspiring. Training may include compliance, specific policies, and reporting procedures. Training should also cover how ethics applies to departments and individual roles. The training should include real-world examples and case studies that help participants think critically through scenarios that they may encounter.</a></p>



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						<p>New hires to receive training within 30 days from being brought onboard. All staff to receive training annually.</p> <p>Create a series of ethics “refresher” training methods, such as holidays, elections, and other events.</p> <p>Develop and incorporate engaging and even entertaining training methods, such as videos demonstrating an ethical dilemma. Can also include use of games, contests, and marketing.</p> <p>Update training material annually to reflect the latest issues, and updated policies and procedures. Keep content fresh and interesting.</p> <p>Identify short-term and long-term program goals. These could include training completion rates, incoming questions by staff, response to follow-up opinion changes.</p> <p>Staff has identified three potential platforms from which to launch Phase I Training. Phase I Training will be a Citywide 30-minute ethics training video. Staff is currently balancing pros and cons of each platform, specifically limitations for staff to actively interact with the material/video while the training is occurring. Staff will also include a survey to understand the effectiveness of the training and will begin to benchmark ethics training through the percent of training completion by staff.</p>
3.3.	Incorporate <b>Supplier Code of Conduct</b> into contracting; develop	Q1 FY23	<a href="#">Rec. #16</a> (p. 34)	No	1,2,5/No	Work with City Staff to incorporate into contracting (at issuance or renewal); include reporting and oversight mechanism. Require consultants to submit financial disclosures, where appropriate. (Audit Rec. #18; p. 34).

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	communications/ outreach to vendors					City Attorney's Office, City Clerk's Office, City Manager's Office, and Financial Management are coordinating to determine the most effective manner to complete this deliverable.
3.4.	Create and execute <b>Outreach Plan</b> to City employees, elected and appointed officials	Q <del>4</del> 3 FY22	<a href="#">Rec. #6</a> , <a href="#">Rec. #7</a> (pp. 21 & 24)	No	1,3,4/No	Utilize existing City communications platforms and encourage ethics messaging from leadership because they have the ability to strongly influence tone. Create branding material and a campaign to appeal to public service motivation, mission valence, and civic pride. Materials should include FAQ, contact info to receive help, and motto.  Create an ethics communications plan  An outreach plan is being developed alongside the 30-minute training.
3.5.	Create and execute <b>Public Outreach Plan</b> with resources for public on ethics issues, including penalties	Q <del>2</del> 3 FY2 <del>3</del> 2	<a href="#">Rec. #6</a> (p. 21)	No	4/No	Establish website (per 2.2 above) to house all materials, processes; include a guide with questions to understand what might be a conflict; look to use FPPC advice line and resources; other modes.  Create branding material and a campaign to appeal to public service motivation, mission valence, and civic pride. Materials should include FAQ, contact info to receive help, and motto.  EO is currently focused on developing a Citywide training, staff resources webpage, outreach plan, and marketing plan. The EO will pivot to public-facing outreach after training and other resources have launched for staff.
3.6.	Establish Citywide Ethics Liaison	<a href="#">TBD</a>				Issue a policy directive for all City departments to designate an ethics liaison.

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						The Ethics Officer and City Manager staff will begin to work with City Manager and Non-City Manager departments to begin to establish ethics liaisons. Administrative Officers will be introduced to initial Ethics Program information in July 2022.
<b>Intake &amp; Investigation</b>						
4.1.	Identify and if needed establish <b>Clear Paths for Reporting of Ethics Violations</b> , including an anonymous reporting tool (hotline and on-line) and a city-wide database (to be used regardless of the reporting path)	Q <del>1</del> <u>2</u> FY2 <del>3</del> <u>2</u>	<a href="#">Rec. #7</a> (p. 24)	?	1,2,5/No	<p>Identify current paths for reporting certain offenses and identify gaps; assess how investigations are assigned / conducted and identify gaps; identify other resources to receive complaints. Include sexual harassment and discrimination policies. What does accountability look like?</p> <p>Create an ethics helpline to encourage audiences to proactively reach out with ethics related questions, concerns, or report.</p> <p>Civil Service and Human Resources Departments presented information on reporting pathways to the Commission as well as violation outcomes from 2019.</p> <p>The Ethics Capstone Team recommendations will be reviewed for potential next steps on best ways to educate staff on reporting pathways. This deliverable will also be part of the Education Program.</p>
4.2.	Obtain necessary authority to work with City Auditor to implement process of <b>Audits and Effectiveness Checks</b>	Q2 FY22	<a href="#">Rec. #1</a> (p. 13)		1,2,5/Need access to info without broader publication	

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4.3.	Establish / enhance <b>Investigation Function</b> within city and develop guidelines for City conducted investigations. Establish <b>EC Role in Investigatory Process</b>	Q3 FY23	<a href="#">Rec. #1</a> (p. 13)	Yes	1,2,5/Yes: If EC takes on investigative function.	Prepare matrix of investigative authorities, including FPPC. Charter Amendment will be needed if EC to take on investigations.
<b>Oversight of City Ethics Program</b>						
5.1.	Implement <b>Proactive Measures and Checks</b> for Ethics Program effectiveness	Q2 FY22	<a href="#">Rec #1, Std #1</a> (pp 11-13)	No	1,2,5/Yes, if centralized in EC	Who is responsible for what? Consider centralization to ensure program consistency and effectiveness. Work with City Manager, City Attorney, and City Auditor on process for receiving reports, data and information on Ethics issues.
5.2.	Identify <b>Penalties and Discipline</b> that can be imposed for violations. Assess possible changes.	Q1 FY23	<a href="#">Rec. #9</a> (p. 28)	No	1,2,3/ Potentially yes	Consult with Human Resources and the City Attorney any proposed changes. Establish Corrective Action Guidelines  <a href="#">Develop a clear, responsive action plan for managing ethical transgressions with accountability. The plan should include penalties or disciplinary actions for ethical misconduct and information on how retaliation is addressed at the City.</a>  <a href="#">Create a reporting chart showing the processes, once determined, and post online.</a>
5.3.	Implement <b>Annual Certification of Compliance</b> with City's Ethics Code	Q3 FY22	<a href="#">Rec. #11</a> (p. 33)	No	1,2,5/No	May have different certs for employees, managers, and City Council. Collaborate with City Clerk, City Attorney, HR, City Manager, etc. as needed. May need amendment to Municipal Code.

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						This deliverable will be rolled into the Ethics Program as it begins to be developed and implemented.
5.4.	Improve <b>Form 700 Compliance</b> , enforcement, and investigation	<a href="#">Q3 Annually</a> <a href="#">Q2 FY22</a>	<a href="#">Rec. #21</a> (p. 44)	No	2,5/No	Request updated report on status of Form 700 filings. May include recommendation of local fines and/or other penalties for adoption by City Council.  City Clerk will provide periodic updates and an annual report.
5.5.	Review existing Gift Disclosure policy and propose, if needed, improved process for <b>Review of Gift Disclosures and Donors</b> against City contracts, development projects to ensure there is no conflict of interest	Q2 FY23	<a href="#">Rec. #22</a> , <a href="#">Rec #23</a> ; (p. 47)	No	1,2,5/No	Draft and recommend language and process that increases timely submission compliance of all applicable gift disclosure forms prior to or within 10 days of gift receipt; <a href="#">AR8-2</a> and <a href="#">AR2-5</a> .  The City Attorney's Office provided a presentation on the City's gift disclosure policies in May 2022. This item is now complete.
5.6.	Direct appropriate staff to <b>Periodically Audit City Buyers' Activities</b>	Q3 FY22	<a href="#">Rec. #17</a> (p. 34)	No	1,2,5/Yes	Charter Amendment may be needed as well as assistance from City Auditor's Office.  Financial Management presented on the new procurement process and its measures that deter, reduce, or eliminate unethical behavior during the procurement process during their presentation on February 2022.
5.7.	EC to conduct <b>Proactive Audits on Select Campaign</b>	Q2 FY23	<a href="#">Rec. #15</a> (p. 34)	Yes, f conducted by EC	1,2,5/Yes	Charter Amendment may be needed. Once process has been established, would EC hire a consultant/outside auditor?

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	<b>Contributions and Expenditures</b>					
<b>Lobbying &amp; Campaign Financing Requirements</b>						
6.1.	Create <b>Action Plan for Lobbying &amp; Campaign Financing Requirements</b> workstream	Q <del>23</del> FY2 <del>31</del> <sup>34</sup>	<a href="#">Rec. #5</a> (p. 18)	No	No	Consider retention of external expert to conduct workshop with EC re best practices. For reference, resources and code <a href="#">LBMC 2.08</a> relating to Lobbying can be found here: <a href="http://www.longbeach.gov/cityclerk/services/lobbyist/">http://www.longbeach.gov/cityclerk/services/lobbyist/</a>  This deliverable is currently under consideration by the Ad Hoc Committee on the Lobbyist Ordinance and work is ongoing. The Ad Hoc Committee is working with staff and will share finding and recommendations with the full Commission as progress is made in this area.
6.2.	Review <b>City Lobbying &amp; Campaign Financing Requirements</b> and recommend changes, as needed	Q <del>24</del> FY2 <del>31</del> <sup>34</sup>	<a href="#">Rec. #5</a> (p. 18)	No	2/No	Benchmark; review distinction between advocacy and lobbying; non-profits/charitable organizations  City Clerk presented on this issue in February 2022. This deliverable is currently under consideration by the Ad Hoc Committee on the Lobbyist Ordinance and work is ongoing. The Ad Hoc Committee is working with staff and will share finding and recommendations with the full Commission as progress is made in this area.
6.3.	Review sample of <b>Mayor and City Council Visit Logs and Calendars</b> to identify lobbyists	Q4 FY22	<a href="#">Rec. #24</a> (p. 49)	No	1,2,5/If needed to get access to the records	Calendars to be included in definition of public records.  The Ad Hoc Committee on the Lobbyist Ordinance has received all electeds' calendars that are

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	and ensure compliance with requirements					available for review that were available for the timeline requested. This item is now complete.
6.4.	Oversight of <b>City Revolving Door Regulations</b>	Q1 FY23	<a href="#">Rec. #25</a> (p. 49)	No	1,2,5/Yes	City Manager's Office is working with City Attorney's Office to determine appropriate time to bring this item before the Commission.
6.5.	<i>Workstream deliverables to be expanded</i>					

Potential new workstream/deliverable:

- Incorporate new ethics-related language and questions in all city job postings, interview questions and the job performance evaluation process.

Duties of Ethics Commission

1. Support stakeholders in administering the provisions of the Charter and laws relating to campaign finance, conflicts of interest and governmental ethics
2. Recommend improvements to increase effectiveness of campaign finance reform, lobbying, governmental ethics and conflicts of interest laws
3. Advocate understanding of the Charter, City ordinances and the roles of elected and other public officials, City institutions and the City electoral process
4. Educate stakeholders about City, state, and federal ethic laws and the importance of ethics to the public's confidence in municipal government
5. Assist departments in developing their conflict of interest codes as required by law

\*Timeline Priority: Fiscal Year (FY): October 1 to September 30

Q1: October 1 to December 31

Q2: January 1 to March 31

Q3: April 1 to June 30

Q4: July 1 to September 30

**City of Long Beach  
Action Plan Deliverables Timeline  
Anticipated Monthly Schedule**

**2022**

<b>January</b>	<b>Workstream</b>
Capstone Report on Ethics Education Program review	3.2
<b>February</b>	
Supplier’s Code: Commission receives presentation from Financial Management on current supplier code work	3.3
Lobbying	6.2
<b>March</b>	
Anti-Retaliation/Anti-Harassment Policy presentation and review	2.7
<b>April</b>	
Immediate Family Disclosure Presentation and Review	2.10
Staff receives and synthesizes bargaining organizations feedback on Code and updates Code with any changes to present to Commission	2.3
<b>May</b>	
Commission’s Disclosure Policy is brought back for review and adoption	
Gift Disclosure Policies presentation and review	5.5
<b>June</b>	
Form 700 Yearly Report	5.4
Commission’s Disclosure Policy is brought back for review and potential adoption	
Discussion on District Attorney letter regarding campaign violations	6.2
Ethics Officer Report	
<b>June Study Session</b>	
Lobbying – Ad Hoc on Lobbyist Ordinance presentation and recommendations	6.2
<b>July</b>	
Commission Chair and Vice Chair elections	1.1
Ethics Officer Report	1.1



Procurement and accounts payables presentation	
Conflict of Interest Handbook and Gov. Code Section 87306.5 Presentation ( <a href="#">Department COI due to Council no later than October 1, 2022</a> )	2.9
Immediate Family Disclosure Presentation and Review	2.10
Action Plan Update	1.1
<b>August</b>	
Ethics Officer Report	1.1
Immediate Family Disclosure policy presentation and review	2.10
Code of Conduct is shared with Commission and may be sent to Council for review and adoption as an ordinance	2.3
Lobbying	6.2
Conflict of Interest Handbook and Gov. Code Section 87306.5 Presentation ( <a href="#">Department COI due to Council no later than October 1, 2022</a> )	2.9
Disclosure Policy – Ad Hoc on Commission Disclosure Policy	
<b>September</b>	
Public Records Request Act (PRA) presentation	
Supplier’s Code draft presentation and review	3.3
Ethics Guide presentation	2.4
Ethics Officer Report	1.1
(Tentative) Report on Campaign Violations for Primaries	6.2
<b>October</b>	
Ethics Officer Report	1.1
Ethics Guide Review	2.4
<b>November</b>	
Ethics Officer Report	1.1
<b>December</b>	
Ethics Officer Report	1.1