

2021-104 AUDIT SCOPE AND OBJECTIVES

Metropolitan Water District of Southern California

The audit by the California State Auditor will provide independently developed and verified information related to the personnel policies and practices of the Metropolitan Water District of Southern California (Metropolitan). The audit's scope will include, but not be limited to, the following activities:

1. Review and evaluate the laws, rules, and regulations significant to the audit objectives.
2. Evaluate Metropolitan's efforts to implement previous California State Auditor recommendations related to its ethics office and personnel policies. Determine whether Metropolitan fulfilled the commitments it made in response to those recommendations.
3. To the extent possible, analyze Metropolitan's current personnel policies and practices related to recruiting, job posting, examinations, promotions, transfers, and conducting employee evaluations. Specifically, evaluate whether Metropolitan has put measures in place to ensure equal employment opportunity with specific regard to gender and LGBTQ+ status and identify what, if any, barriers to equal employment opportunity (EEO) exist.
4. Evaluate Metropolitan's process for notifying employees and union representatives regarding changes to operating and personnel policies and procedures, including the following:
 - (a) Changes to job descriptions and postings.
 - (b) Changes to its EEO and workplace bullying complaint process. Determine whether Metropolitan has assigned a contact person for such complaints.
 - (c) Changes to safety protocols and its Illness and Injury Prevention Program.
5. Determine whether Metropolitan has established adequate policies and procedures to train employees on EEO, sexual harassment, workplace bullying, and safety, including Hazardous Waste Operations and Emergency Response (HAZWOPER) protocols.
6. Evaluate Metropolitan's policies and practices for handling EEO complaints—including complaints of sexual harassment—and workplace bullying complaints by doing the following:
 - (a) Determine the total number of EEO and workplace bullying complaints filed since 2004.
 - (b) Review a sample of EEO and workplace bullying complaints filed since 2004 to determine what process Metropolitan officials used to handle complaints and the results of that process, including disciplinary actions.
 - (c) To the extent possible, determine whether Metropolitan officials retaliated against any individuals who filed EEO or workplace bullying complaints.

7. To the extent possible, assess Metropolitan's policies and practices regarding non-disclosure agreements (NDAs) in situations involving EEO complaints, sexual harassment, workplace bullying, and related issues by doing the following:
 - (a) Determine whether Metropolitan officials have taken adequate steps to implement Code of Civil Procedure Section 1001 related to NDAs.
 - (b) Identify the total number of NDAs Metropolitan has entered into since 2004 and what types of employee issues such agreements involve.
 - (c) Determine whether Metropolitan has considered releasing signatories of NDAs entered into prior to 2017 from their nondisclosure obligations.
8. To the extent possible, evaluate Metropolitan's policies and practices for reporting settlement agreements for employee complaints to the board, including the legal department's policies and practices for reporting such agreements to the board's Organization, Personnel and Technology Committee.
9. Evaluate Metropolitan's safety program by doing the following:
 - (a) Assess Metropolitan's protocols for the reporting of safety incidents by employees and by supervisors and management employees to higher authorities within Metropolitan. Determine how Metropolitan manages and ensures the consistency of the variety of safety reporting protocols it uses.
 - (b) Identify the role of safety representatives at worksites and determine whether they are empowered to halt unsafe work or correct unsafe conditions.
 - (c) Identify what safety and other personal protective equipment Metropolitan provides to employees and for what purposes.
 - (d) Assess Metropolitan's safety protocols for employees who work on roads and streets, including equipment and procedures for lane closures.
 - (e) Review a selection of safety complaints since 2010 to assess how Metropolitan officials handled reports of unsafe working conditions and other safety incidents.
 - (f) Determine whether Metropolitan has adequate policies and procedures to protect employees, including safety representatives, who make safety-related complaints from retaliation.
10. Assess Metropolitan's HAZWOPER Program and evaluate its effectiveness in addressing hazardous waste issues, including processes for employees to address HAZWOPER issues on the job.

11. Identify Metropolitan's obligations as a landlord to employees for whom it provides company housing. In particular, assess Metropolitan's processes for the following:
 - (a) Handling landlord-tenant relations, rental agreements, and landlord-tenant disputes, including in the case of tenants who separate from employment.
 - (b) Addressing habitability issues such as lead, asbestos, water and faucet quality, provision of adequate utilities, and related issues.
 - (c) Addressing other concerns related to living conditions, including replacement housing, repairs, and the provision of rental insurance.
 - (d) Providing emergency medical services in remote locations including 9-1-1 service, life flight/medical transport, fire, police, and security. Determine how these matters are addressed when such services may be unavailable.
 - (e) Providing services for the children of employees, including educational arrangements, busing, and community safeguards to prevent accidents, injuries, and potential hazards.
 - (f) Otherwise managing its employee housing program.
12. Review and assess any other issues that are significant to the audit.