



MONTGOMERY COUNTY ETHICS COMMISSION

Montgomery County Ethics Commission
Annual Report for Calendar Year 2021

I. Introduction

Section 19A-6(f) of the Montgomery County Public Ethics Law requires the Ethics Commission (the Commission) to publish an annual report. The report is to summarize the actions the Commission has taken during the preceding calendar year and describe the waivers it approved and advisory opinions it issued during the year.

The Commission's mission is to promote the public's trust of County government through the independent administration, including enforcement, of laws designed to ensure the impartiality of County employees, including elected officials, in the execution of their responsibilities. The Commission does this through the administration of three programs: financial disclosure, lobbying disclosure, and outside employment approval -- and through myriad other activities.

The year 2021 continued to reflect the resiliency of Commission operations in the context of the ongoing challenges resulting from the pandemic. As with 2020, the Commission managed remote operations smoothly. This, in large part, is a consequence of prior investment by the County in technology systems to execute Commission programs in financial disclosure, outside employment, and lobbying registration and activity reporting. Remote operations resulted in the continuation of training being conducted remotely. Consideration is being given to permanently implementing some of the online training methodologies.

For the Ethics Commission, 2021 was busy with a renewed focus on ethics issues in the County. The County enacted new ethics legislation, Bills 42-20 and 47-20 that became effective in March and June 2021, with concomitant changes to programs including financial disclosure and training.

As we turn towards 2022, we expect that some of the business systems and methods that the Commission adjusted to in 2020 and 2021 will be retained while others will be executed in a manner consistent with past practices. We expect that adjusting to new circumstances will be a constant -- and believe that the Commission is well-positioned to make changes that are necessary and appropriate to execute its mission.

MONTGOMERY COUNTY ETHICS COMMISSION

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The Commission currently has five members which is a full complement under the Public Ethics Law. They, along with the respective dates of their terms' expiration, are:

Susan Beard, Chair	10/2021
Bruce Romer, Vice Chair	10/2021
Rahul Goel	10/2020
Jennifer Collins	10/2023
Mary Ann Keeffe	10/2023

Susan Beard was Chair of the Commission during 2021, with Bruce Romer serving as Vice Chair. At the December 2021 meeting of the Commission, Susan Beard was elected Chair and Bruce Romer was elected Vice Chair for 2022. In accordance with the Public Ethics Law, members whose terms have expired serve until they are reappointed or the Council confirms a successor.

The Commission did not meet in person in any public meeting during 2021. The Commission held three public meetings in 2021 using the Zoom platform. These meetings occurred in February, September and December. In each of the meetings, a portion of the meeting was held in closed session pursuant to Maryland General Provisions Article 3-305(b). The Commission also met in online Zoom administrative sessions in June, October and November to handle confidential matters.

The Commission made substantial progress towards its primary objectives for the year. Going into the year 2021, the Ethics Commission sought to implement new ethics legislation and continue providing full service in connection with the administration of its programs. With advent of changes to the Commission's training authority by virtue of Bill 47-20, effective June 1, 2021, the Commission began working toward building a framework for systemic ethics training and knowledge development. The implementation of a comprehensive and systemic training regimen for County employees is a major priority for the Commission in 2022.

Training will be further discussed in the Education section below.

II. Status of Programs and Operations

Ethics program statistics:

Performance Measures	Actual 2019	Actual 2020	Actual 2021	Target 2022	Target 2023
Number of Issuances of Formal Opinions, Waivers, or Guidance	19	13	21	21	21
Number of Lobbyists Registered	135	148	152	152	152
Number of Lobbyist Activity Reports	219	221	250	250	250
Number of Financial Disclosure Statements for Calendar Year	1814	1703	1814	1814	1814
Number of Outside Employment Requests	2241	1125	1548	1548	1548

This annual report summarizes the work of the Commission in each of the following areas:

1. **Financial Disclosure**
2. **Outside Employment**
3. **Lobbying**
4. **Complaints, Investigations and Hearings**
5. **Advisory Opinions, Interpretation and Advice, and Waivers**
6. **Education**
7. **Legislative and Regulatory**
8. **Outreach**
9. **Administration**

1. Financial Disclosure:

The Public Ethics Law promotes the public's confidence in the integrity of County employees by requiring certain employees, including elected officials, to file financial disclosure reports that are required to be made publicly available. The reports detail financial holdings and relationships so that conflicts of interest between an employee's County duties and the

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employee's personal activities and interests can be identified and addressed. The Public Ethics Law requires filings of financial disclosure reports when individuals are first appointed to a filing position, annually thereafter, and when terminating from a filing position. The Commission prepares financial disclosure forms and makes them available electronically and maintains reports filed by employees; it currently administers the electronic filing system for reporting and coordinates with the Office of Human Resources and all County agencies regarding the status of filers. It also resolves all anomalous circumstances and questions associated with the filing of financial disclosure reports.

There were minor changes to the Financial Disclosure System in 2021 resulting from amendments to the ethics law. Bill 42-20, effective March 2021, requires disclosure by non-merit and elected public employees with outside employment of sources of fees greater \$1,000 – in other words, the law requires disclosures regarding clients.

The Commission extended the time to file the 2020 annual financial disclosure form from April 15 to May 17 to conform to the extension by the Internal Revenue Service of time to file a federal tax return. There were 1814 financial disclosure forms completed by public employees in 2021. Successful program administration is dependent on the accuracy of the database of employees and their status as filers. It is also dependent on the employees who file the forms and on County senior management who are the designated reviewers of forms. Lastly, it is dependent on County human resources liaisons and managers to follow-up with employees who have not filed and to obtain final reports from employees who are terminating from filing positions. Members of certain County boards, commissions, and committees, who are considered “public employees” for purposes of the public ethics law, are also required to file reports. As these persons are not normally tracked in the County's personnel system, a separate system has been established to track the status of these persons.

With respect to full-time County employees, there was one hundred percent compliance with the requirement to file annual financial disclosure reports. Those terminating service as full-time employees were also universally compliant, and the Commission ensures this by having, in accordance with the ethics law, the County withhold the final paycheck of employees until a final disclosure statement has been filed. There are instances where the Commission is not notified of a filing employee's departure from service, and the employee is paid without having filed a final disclosure. Due to notification and enforcement challenges associated with obtaining these reports, on occasion Commission staff treats the last filed report by the filer as a final report. This also occurs with some terminating board, commission, and committee volunteers who terminate service without filing a disclosure report after leaving County service.

2. Outside Employment: The Public Ethics Law requires that County employees obtain approval from the Commission prior to engaging in any compensated service other than County employment.

The Commission utilizes the outside employment online system (OEOS) to process requests for outside employment. The system provides a vehicle for review by the employing department's management and the Ethics Commission. The Commission's staff prepares all requests for consideration by the Commission, to include obtaining additional information from requestors

and County agencies and conducting preliminary legal analysis of requests. The Commission approves requests, as appropriate, setting conditions on approval as necessary to ensure compliance with ethics requirements, and staff notifies requestors by email of the disposition of requests by the Commission. The Commission publishes approved Outside Employment information required to be made publicly available by the Public Ethics Law.

Up until August of 2019, the OEOS was used only by employees other than police to make requests for outside employment. Sworn police did not use the OEOS and instead used a form created by the Department of Police that conformed to the policies and practices of the Department. Those police forms were then submitted to the Ethics Commission for processing and approval.

The online system addressing police requests for outside employment was implemented in August of 2019. When the Commission first rolled out the OEOS for all County employees other than sworn police, it established that approvals would only be effective for a maximum of three years. As expected, the new electronic form is simple to fill out, does not involve undecipherable handwriting, and can be processed by the police and the Ethics Commission in a much quicker, more manageable and efficient way. And because the system is electronic rather than paper, the manual data processing burden on Commission staff (and Department of Police staff) of keying in data from hundreds of paper forms has disappeared.

The Commission acted on 1548 requests for outside employment in calendar year 2021.

A current list of outside employment approvals is incorporated into dataMontgomery's publicly available information of all currently approved outside employment of County employees. This can be found at: data.montgomerycountymd.gov/Government/Outside-Employment/j6hr-qfpx/data Employees are notified prior to the expiration of their approvals so that new filings can be made if an employee desires to continue the outside employment.

The Outside Employment Online System (OEOS) allows for substantial benefits in program management as Commission staff has insight to all pending applications for outside employment. Previously, an employee filling out a paper application would submit the paper through the employee's chain of command and the Commission would have no notice or opportunity to ensure the process was operating effectively until it received the paper form after it had been processed by the employee's agency.

3. Lobbying: The Public Ethics Law requires persons meeting certain criteria and thresholds who communicate with County employees to register as lobbyists and to file semi-annual activity reports with the Commission. Annual registration fees are required and are paid to the Commission and processed and deposited into the General Fund.

Since 2013, lobbying registration and activity reporting has been effected through an online application developed by the Commission and the Department of Technology Services. The system has made registration easier for registrants, allowed data to be captured electronically rather than by manual processes of Commission staff, and promoted transparency for the public in accessing the online data.

These systems have resulted in almost instantaneous availability of lobbying information on the Ethics Commission's website.

<https://www2.montgomerycountymd.gov/Lobbyist/ActivityReport.aspx>

As a result of having implemented a lobbying filing system with reliable data sets, Commission staff has focused additional time on proactive steps to educate those who might meet registration thresholds in the Public Ethics Law to register as lobbyists.

As the system is easy to use, registering lobbyists' compliance with requirements is very high. For example, 100 percent of required semi-annual reports on lobbying activity for the last several years (including 2021) have been filed. This compliance rate is in stark contrast to the system in place prior to 2013 where compliance was irregular and there were no systems in place to measure compliance.

The total receipts for calendar year 2021, are \$18,650.72, a slight increase from 2020 receipts of \$15,639.42. For reference, fee receipts for 2019 were \$18,116.42; \$20,500 in 2018 and \$30,625 in 2017. Variances in the numbers of lobbyists required to register is beyond the Commission's control but is believed to be a function of community interest in land use matters before the County Council, particularly Master Plans.

4. Complaints, Investigations and Hearings: Pursuant to the Public Ethics Laws, the Commission receives complaints and, as appropriate: conducts investigations and hearings, makes findings, and imposes sanctions and penalties. During 2021, the Commission received several allegations of ethics violations constituting "informal" complaints. (A complaint that is made that does not meet the ethics law's requirements for submission of a formal complaint is treated as an "informal" complaint.)

Matters that do not raise issues within the jurisdiction of the Commission are closed or referred to a more appropriate office for disposition. Others are brought to the attention of the Commission and considered and addressed by the Commission. When appropriate, matters are coordinated with the County Attorney, the relevant County agency or the Inspector General. The Commission is authorized to conduct investigations on its own initiative and to bring complaints.

During 2021, the Ethics Commission authorized a formal investigation of the matter and engaged the Office of Inspector General to conduct the ethics investigation on behalf of the Ethics Commission in accordance with provisions of the County ethics law. The Inspector General delivered a confidential report of investigation to the Ethics Commission on November 18, 2021. As of the end of 2021, the matter addressed in the report of investigation is unresolved.

At the beginning of 2021, the Commission had a pending matter in the Circuit Court concerning an appeal of a dismissal by the Ethics Commission of a complaint. In a decision rendered April 26, 2021, the Circuit Court affirmed the dismissal of the complaint by the Ethics Commission.

The Ethics Commission recommended changes to the ethics law, enacted in 2021 through Bill 47-20, clarifying the appealability of Ethics Commission decisions in accordance with recent court decisions and the State Ethics Law.

5. Advisory Opinions, Interpretation and Advice, and Waivers: The Ethics Commission is expressly authorized to interpret the Public Ethics Law and advise persons as to its application. It does this proactively or in response to or as a result of formal or informal inquiries. Commission staff receives a substantial number of informal inquiries from County employees and from members of the public. These questions relate to each of the programs operated by the Commission and with respect to the overall mandate of the Commission under the ethics law.

The Commission is authorized to publish advisory opinions and grant waivers of ethics law requirements, as appropriate. The Commission is required to publish its advisory opinions, or, in the event an opinion is not published, state the reasons for not publishing the opinion.

The Commission published two advisory opinions during calendar year 2021, the full text of which can be found at:

<https://www.montgomerycountymd.gov/Ethics/Decisions/opinions/2021.html>

The Ethics Commission issued 19 waivers, which are published at:

<https://www.montgomerycountymd.gov/Ethics/Decisions/waivers/2021.html>

Brief summaries of the opinions and waivers appear below. The decisions made were limited to the facts presented and no assumption should be made to the application of any opinion or waiver to any other circumstances.

Advisory Opinion 21-08-011

An Assistant Fire Chief with Montgomery County Fire and Rescue Service (MCFRS) sought outside employment to work with a company that provides services to MCFRS through contracts with the Montgomery County Office of Human Resources. The Commission determined that 19A-12(b)(1)(B), prohibiting outside employment with an entity that contracts with the employee's agency, applied to the outside employment request of the Assistant Fire Chief.

The Commission denied the employee's request for a waiver of 19A-12(b)(1)(B) as the employee had been a subject matter expert that worked with the contractor in its performance of contract matters for MCFRS. In fact, the secondary employment offer was made based on the vendor's observation of the employee's expertise.

Advisory Opinion 21-10-017

The Ethics Commission considered whether 19A-11 of the County Code prohibited a Councilmember's involvement in matters relating to whether the County should impose a

COVID-19 vaccination mandate. The Commission decided that the Councilmember's spouse's economic interests in a pharmaceutical company did not implicate the prohibition of 19A-11 because the matter did not affect the pharmaceutical company as, among other things, the County was not purchasing vaccines because they were supplied for free by the federal government.

Waivers.

The Ethics Commission issued 19 waivers in 2021. 14 of the 19 waivers related to outside employment activities.

A public employee is prohibited from, pursuant to § 19A-12(b)(1)(A), being employed by a business that is regulated by the County agency with the public employee is affiliated and, pursuant to § 19A-12(b)(1)(B), from being employed by a business that negotiates or contracts with the County agency with which the public employee is affiliated, unless the Ethics Commission grants a waiver. Many employees are notified of the prohibition after they have submitted a request for outside employment, and it has been reviewed by management or the Ethics Commission. In general, outside employment waiver applications are granted where there is no relationship between the conduct of the employee's County duties and the outside employer and the duties performed in the outside position do not relate to the contract between the County and the outside employer. In short, they are approved where there is no actual conflict of interest.

The waivers issued of 19A-12(b)(1)(A) and (B) involved the following employees:

Waiver 21-01-001	Pedro Ispizua	DOCR
Waiver 21-01-002	Chidera Nwoke	DOCR
Waiver 21-03-003	Rudolph Royer	DHHS
Waiver 21-04-005	Carlos Hickman	ABS
Waiver 21-06-008	Allelign Sisay	DHHS
Waiver 21-06-009	Scott Hoglander	FRS
Waiver 21-08-012	Jattu Navo	DHHS
Waiver 21-08-013	Elaine Byfield	DHHS
Waiver 21-10-015	Beri Kari-Fonge	DHHS
Waiver 21-10-016	Carolyn Brown	DHHS
Waiver 21-12-019	Emily Pavetto	DHHS
Waiver 21-12-020	Angeline Bell	DHHS
Waiver 21-12-021	Lissa Hicks	DHHS

These waivers are not discussed in detail here and can be reviewed in full at:
<https://www.montgomerycountymd.gov/Ethics/Decisions/waivers/2021.html>

Waiver 21-11-018 also involved the prohibition of 19A-12(b) but presented an unusual circumstance. Tiffany Jones, a member of the Community Action Board (CAB) was hired to fill an outside position that had been funded pursuant to an action of the CAB. In issuing the waiver, the Ethics Commission determined that the CAB no longer had any responsibility for funding or oversight of the program or the outside position and that the standard for waiver issuance was

met. The waiver was conditioned on Ms. Jones not participating in any matter where her outside employer is a party to the matter or where the matter has any impact on the conduct of the program.

The other five waivers issued involved requests for waivers of application of other provisions of the ethics law.

W21-04-004 concerned the manner of compensation for the class of food and beverage service employees of the Montgomery County Revenue Authority as so-called “tipped” employees. Normally, tips to public employees would be prohibited gifts and receipt of them would constitute misuse of the prestige of office from private gain. These seasonal employees are paid a salary that is less than the standard minimum wage and the Commission found that the benefit of their receipt of otherwise prohibited tips did not create any substantial advantage to these employees. The Commission also determined that the importance to the County of the food service employees doing their jobs for tips outweighed the actual or potential harm of any conflict of interest because it allows MCRA to serve customers in a manner consistent with industry practices.

Waiver 21-05-006 was issued in connection with a collaboration involving case studies between Department of Technology & Enterprise Business Solutions (TEBS) and two vendors, Zammo and Microsoft that without a waiver would implicate the prohibition on inappropriate endorsements. The case studies would demonstrate MCG’s successful partnership with Microsoft and Zammo and highlight the County’s speed and ability to implement technology to quickly respond to changing needs, use of multi-lingual capabilities to remain inclusive, to integrate new Microsoft functionality for an improved customer experience, cost savings and more. Upon review of the request and the concurrence of the Chief Administrative Officer, the Ethics Commission concluded that the restriction on endorsements in 19A-14 should be waived.

Waiver 21-05-007 was a class waiver issued by the Commission to all public employees of the prohibitions of 19A-11(a)(1) and (2) to allow public employees who hold a limited economic interest in certain large publicly traded entities to participate in matters that involve those entities. On December 1, 2020, the County Council, at the request of the Ethics Commission, introduced Bill 47-20 which included the following proposal to 19A-11:

Subparagraph (a)(2) does not apply to an employee’s participation in a matter affecting a business with a principal place of business outside of the County where the employee’s economic interest is limited to ownership of publicly traded securities: (A) issued by a company that is part of the Standard & Poor's 500 Index; and (B) the market value of the securities does not exceed \$25,000. (8) Subparagraph (a)(1) does not apply to an employee’s economic interest that is limited to the ownership of publicly traded securities issued by a company with a principal place of business outside the County if the market value of the securities does not exceed \$50,000.

The Ethics Commission proposed this amendment due to the extreme unlikelihood that an action of the Montgomery County government would impact a large publicly traded entity to such an extent that the entity’s stock price would be materially impacted. At the insistence of the State

Ethics Commission, the Council deleted this provision from Bill 47-20. The State Ethics Commission, however, suggested that the County Ethics Commission might accomplish the same outcome by issuing a class waiver.

The Commission determined that an employee with a few shares of a major corporation's stock who is involved in a procurement involving that corporation's products would reasonably conclude that there is no conflict of interest, because it would be the extremely unusual case that an employee could affect the value of the employee's holding of the Company's stock through action as a County employee. Nonetheless, the County's Ethics Law imposes strict liability in this circumstance and makes the services of that employee unavailable to the County, unless the Commission issues a waiver. The Commission concluded that granting the class waiver was in the best interest of the County because the importance of having County employees do their respective jobs without fear of inconsequential violations of the Ethics Law that might occur in the absence of the waiver outweighed any theoretical harm of such violations.

Waiver 21-07-010 involved 19A-13(b) of the ethics law which provides that for one year after the effective date of termination from County employment, a former public employee must not enter into any employment understanding or arrangement (express, implied, or tacit) with any person or business if the public employee significantly participated during the previous 3 years in regulating the person or business or in any procurement or other contractual activity concerning a contract with the person or business (except a non-discretionary contract with a regulated public utility).

Stacy Spann, the Executive Director of the Housing Opportunities Commission (HOC) requested a waiver of the provisions of 19A-13(b) with respect to his agreement to work for a company ("the Company") which was one of a trio of related companies, the second and third of which were engaged in a substantial number of contracts with the HOC. The Commission determined that without a waiver, the prohibition of 19A13(b) would apply.

Upon consideration of Mr. Spann's request, the Commission found that Mr. Spann's employment arrangement with the Company would not be likely to create an actual conflict of interest. The determination that an actual conflict of interest was not likely resulted from the employing company not having any business before the HOC. Also, in carrying out his duties as President and Chief Executive Officer of the Company, Mr. Spann would have no need for confidential information learned as an HOC employee and would not be expected to work on any specific matters he worked on while an HOC employee. In reviewing the request, the Commission concluded that there was little opportunity for any HOC employee, much less one whose primary role in contract matters is to implement the HOC's decision to approve contract actions, to exercise any significant discretion regarding contract award decisions. The Ethics Commission conditioned the waiver on, among other things, Mr. Spann not making any communication or appearance before the HOC on behalf of the related companies in connection with any matter for one year after terminating County service.

Waiver 21-10-014 involved an employee of the Office of the County Attorney, Charles Frederick, seeking an advisory opinion as to whether the one-year bar of post-employment provision at 19A-13(b) prohibited him from working at a local utility or for the Commission to

waive application of the prohibition pursuant to its authority under 19A-8(c). The Commission decided to waive the application of 19A-13(b) to Mr. Frederick's employment with WSSC. Mr. Frederick, as an attorney in the County Attorney's office, had, over the past few years advised the Department of Permitting Services (DPS) in connection with a memorandum of understanding DPS had with the utility. 19A-13(b) prohibits a former employee from working for a "person or business" where in the past three years the person had worked on a contract matter involving that person or business.

The Commission determined that issuing a waiver of the prohibition of 19A-13(b) would not be likely to create an actual conflict of interest and was consistent with the intent of the ethics law. The waiver was conditioned on Mr. Frederick not advising the utility where Montgomery County is a party to a matter for one year (and that he otherwise comply with the permanent bar of 19A-13(a) on assisting on matters he worked on as a County employee.)

6. Education: The Commission conducts public education and other information programs regarding the Ethics Law. Commission staff routinely provides individual instruction on filling out and review of financial disclosure forms, outside employment requests and lobbying reports, and other matters falling within its jurisdiction.

Prior to the restrictions resulting from Covid, Ethics Commission staff participated in biweekly orientation sessions for all new County employees. When the Covid restrictions on in-person contact were instituted, Commission staff provided a PowerPoint presentation to the Office of Human Resources covering basic tenets of the ethics law.

Mandatory ethics training for executive branch public financial disclosure filers has been conducted since May of 2017 under the authority of the Chief Administrative Officer. The Office of Human Resources Training and Organizational Development Division has provided support in the implementation of this training and compliance initiative.

Because the training must be taken every three years, all those who had received training in 2017 were due for training in 2020. This meant, in essence, that over one thousand executive branch employees were required to take one-hour ethics training. Because prior to Covid restrictions being implemented, all training was conducted in person, this meant that a new vehicle for training delivery was required. After experimenting with several different online training vendors and delivery systems, Commission staff decided to use the Microsoft Teams platform for training delivery. While Microsoft Teams is not a learning management system nor is it specifically designed for a systemic training enterprise, it provided a basic platform for delivery of ethics training. In particular, the Microsoft Teams platform allowed online presentation by Commission staff, along with appropriate PowerPoints. Further, it allowed through its chat feature for Commission staff to monitor both technical problems of attendees in participation and substantive ethics questions so that the primary presenter could present without unnecessary distraction.

In addition to the training being monitored through OHR's learning management system, the Ethics Commission is tracking compliance and notifying, with the help of HR liaisons, those

who have yet to take the training. Commission staff is not allowing persons who show up for training more than 10 minutes late to enter the training sessions and Commission staff tries not to extend credit to those who miss a substantial portion of a session, such as those who leave early to address other business. Where the Commission is able to identify such employees, the employee is notified that they are not receiving credit and are informed that they may attend the portion of the session that they missed. In short, the Commission staff is treating the training as a compliance program.

In 2021, the Commission staff conducted 20 online training sessions of 1-1.5 hours. Nine of these were online training sessions using Microsoft Teams directed to public financial disclosure filers. In addition, Commission staff conducted four training sessions directed to Commissioners and employees of the Housing Opportunities Commission, three sessions aimed at the members and employees of the Montgomery County Revenue Authority, and four sessions directed to members of legislative Boards, Committees and Commissions. Commission staff conducted numerous individualized training sessions to address such matters as how to review financial disclosure reports, operate the financial disclosure system and how to review outside employment requests.

Bill 47-20, effective June 1, 2021, granted the Ethics Commission broad authority to require ethics training for the County's public employees. The Commission intends to leverage this authority to ensure that County employees receive needed ethics training. Commission staff is coordinating with the Office of Human Resources and other County agencies in identifying needed training and overall communication about ethics obligations of County employees

7. Legislative and Regulatory: The Commission recommends and prepares new ethics legislation and regulations.

The Commission prepared legislation that was submitted to the County Council for consideration in September 2020. Commission staff also worked with Councilmember Friedson and his staff in connection with a bill that Mr. Friedson sought to introduce to address various concerns associated with the misconduct of the prior Chief Administrative Officer. This became bill 42-20 which was signed into law in December 2020. Subsequently, Councilmember Katz introduced the Ethics Commission's proposed legislation, which removed provisions that had already been addressed in Mr. Friedson's bill; this was Bill 47-20 which was enacted in March 2021 and became effective June 1, 2021.

Bill 42-20 and the various documents considered by the County Council in connection with it can be found at:

<https://apps.montgomerycountymd.gov/ccllims/BillDetailsPage?RecordId=2680&fullTextSearch=42-20>

Bill 47-20 and the documents associated with that legislation can be found at:

<https://apps.montgomerycountymd.gov/ccllims/BillDetailsPage?RecordId=2685&fullTextSearch=47-20>

The Commission submitted no other requests for legislative change in 2021. The Commission considered at its September meeting a question of whether Commission wished to make a recommendation to the County Council regarding the scope of the County's lobbying law. The Commission decided to monitor developments regarding possible state legislation regarding local lobbying laws.

8. Outreach and Other Activities: The Staff also serves as the principal public resource on the County's ethics laws, to include managing a website that reflects Commission programs, activities, and publications such as annual reports, approvals of outside employment requests, lobbying data, and waivers and opinions.

9. Administration: The Staff of the Commission is responsible for assuring that Commission meetings are run in accordance with the Open Meetings Act and other applicable law. The Staff informs and advises the Commission as to all material matters under its jurisdiction; Commission staff are also responsible for budget, procurement, human resources, and resource management for the operation of the office in accordance with Montgomery County policies, and attends required training in these and other office management areas.

For the Commission:

Respectfully Submitted,



Susan Beard, Chair

3/1/2022

Date