

CITY OF SAN ANTONIO

ETHICS CODE

HANDBOOK FOR
CITY EMPLOYEES

JULY 2009



Our city's Code of Ethics will help to ensure that each of us conducts ourselves in the honorable manner expected of public servants, as well as help each of us make the right decision when faced with an ethical dilemma.

We have an individual obligation to serve our organization with integrity, fairness and respect. Ethics is at the heart of solid leadership. I trust that this handbook will support and guide you as an important member of the San Antonio team.

Sheryl Sculley
City Manager



CONTACTS AND RESOURCES INFORMATION

OFFICE OF THE CITY ATTORNEY ETHICS COMPLIANCE OFFICER

Physical Address

Office of the City Attorney
City Hall, Third Floor
100 Military Plaza
San Antonio, TX 78205

Mailing Address

Office of the City Attorney
City Hall
P.O. Box 839966
San Antonio, TX 78283
(210) 207-8940
Email: ethics@sanantonio.gov

OFFICE OF THE CITY CLERK ETHICS SUPERVISOR

Physical Address

Office of the City Clerk
City Hall, Second Floor
100 Military Plaza
San Antonio, TX 78205

Mailing Address

Office of the City Clerk
City Hall
P.O. Box 839966
San Antonio, TX 78283
(210) 207-7253
Email: ethics@sanantonio.gov

Ethics Review Board

The Ethics Review Board may be contacted through the Office of the City Clerk.

City Ethics Webpage: www.sanantonio.gov/ecfl
Includes complete Ethics Code and all ethics forms.



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INTRODUCTION

The City of San Antonio has adopted a Code of Ethics which established standards of conduct for current and former city officials and employees, lobbyists and individuals doing business with the city. This handbook was designed to provide an overview of the provisions of the code which most directly affect the city's employees. Use this handbook as a guide and introduction, but please note that it is not intended to take the place of reading the code itself.

A complete hard-copy edition of the Ethics Code as well as other handbooks will be provided by the Office of the City Attorney upon request to city personnel. In addition, the Code, handbooks, disclosure forms and other information regarding the city's ethics regulations are on the Ethics Webpage at: www.sanantonio.gov/ecfl.

All employees are required to attend training on the Ethics Code at least every other calendar year. Video presentations will be offered through the departments. The video is also available for viewing through the city's ethics webpage at: www.sanantonio.gov/ecfl.

The city's boards and commissions members should consult the materials provided by the Municipal Leadership Institute. For information about provisions which apply to lobbyists or individuals or organizations doing or seeking to do business with the city, please refer to the Ethics Code.

You are welcome to contact the ethics attorneys at the Office of the City Attorney at (210) 207-8940 concerning any questions you may have regarding the city's Ethics Code.





CONFLICTS OF INTEREST

City officials and employees cannot take part in any matter as a representative of the city where action by the city might affect the financial interests of themselves and their family members or household members.

A city employee has a conflict of interest if city action will affect the financial interests of:

- 1) the employee;
- 2) the employee's family members up to the second degree or members of the employee's household (see family chart on the inside back cover);
- 3) the employers of the employee's family or household members;
- 4) businesses owned by the employee or by family or household members of the employee;
- 5) the employee's outside employers or clients;
- 6) any business or non-profit organization for which the employee serves as an officer, director or other policy making position;
- 7) any person or business with whom the employee is negotiating or considering an offer of employment or a business opportunity.

If you have a conflict:

Notify your supervisor so the matter can be reassigned;

File a recusal form at the Office of the City Clerk to disclose the conflict and to describe the matter from which you are removing yourself. Forms are located on the Ethics Website or at the Office of the City Clerk.

Office of the City Clerk
City Hall – 2nd Floor
100 Military Plaza
(210) 207 - 7253



CONFLICTS OF INTEREST

Examples:

Bill works for the Department of Parks and Recreation. He has been asked to take part in the selection of a vendor for the purchase of new gardening equipment. When Bill looked over the proposals, he noticed that the company for which his brother works is one of the businesses seeking this contract. Bill must notify his supervisor so that he can be removed from this assignment, and he must file a recusal form with the Office of the City Clerk.

Susan works for the Department of Community Initiatives. She has been asked to review an application from a non-profit youth sports organization that would like to obtain funding for its program. Susan was just recently appointed to the board of this organization, although this application was submitted before that appointment. Although she was not involved in the submission of the application and even though the city's action on this matter will not affect Susan financially, Susan has a conflict because of her membership on the board of this organization, and she must recuse herself.

Tina works in the Development Services Department where she has assisted many customers in filling out applications for permits. Carlos, the owner of Acme Construction, has worked with Tina on several occasions and was impressed with her courtesy and efficiency. One afternoon while submitting paperwork for another permit, Carlos asked Tina whether she would be interested in coming to work for his company. Tina was interested and said she would like to talk about this opportunity some more. Because she is considering employment with Acme Construction, Tina has a conflict of interest in handling any permit application from that company. Tina must advise her supervisor that the permit application must be reassigned, and she must submit a recusal form to the Office of the City Clerk.

Note: If Tina accepts employment with Acme, she must be aware that the city's Ethics Code will limit her ability to assist Acme or its clients in its dealings with the city. Please see the section regarding the Ethics Code provisions on page 11 for former officials and employees.



UNFAIR ADVANCEMENT OF PRIVATE INTERESTS

The Ethics Code prohibits city employees from using their position with the city to receive special treatment for themselves or anyone else. This includes an employee using his or her position with the city to unfairly hurt someone else's private interests. In short, decisions on behalf of the city must be made on the merits of the issue and not on any personal considerations.

This provision includes some specific rules:

- 1) If you know the city will be taking official action on a contract, a zoning decision, or other matters, do not use that knowledge to profit from the transaction;
- 2) **Do not** agree with anyone to receive something in return for official action you take;
- 3) You **cannot** be involved in the hiring, appointment or a vote for your spouse or any relative within the third-degree blood relative or second-degree relative by marriage for an office or job with the city (see family chart on the inside back cover);
- 4) You **cannot** supervise your spouse or relative within the third-degree of consanguinity or second degree of affinity.

If you have a conflict under this provision:

Notify your supervisor so the matter can be reassigned;

File a recusal form at the Office of the City Clerk to disclose the conflict and to describe the matter from which you are removing yourself. Forms are located on the Ethics Website or at the Office of the City Clerk.

Office of the City Clerk
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UNFAIR ADVANCEMENT OF PRIVATE INTERESTS

Examples:

Ray owns property close to an area that is under consideration for a change in zoning from residential to commercial. If the area is rezoned as commercial, the values of these properties may rise. Ray cannot be involved in any discussion or action pertaining to this proposed zoning change.

Sarah works with Ray and has been involved in the staff discussions on whether to recommend the proposed zoning change. Sarah must not purchase property that may be affected by the zoning change while the issue is still pending before the city.

Oscar has applied to work for the Information and Technology Services Department. His uncle (a third-degree relative) has worked as a supervisor in that department for several years. Oscar's uncle cannot take part in any discussion regarding the decision to hire or not hire Oscar. If Oscar is hired, he cannot work in his uncle's line of supervision.

Kathy works for the Public Health Department. On the weekends, she likes to volunteer at a senior citizen center teaching arts and crafts. The senior center has contacted the Public Health Department to provide some medical supplies and personnel for an upcoming health fair. Kathy's supervisor has asked her to review the request. This assignment would not violate the "conflict of interest" rule because the city's action will not affect the financial interests of Kathy, her family, the employers of her family members, or any organization on which she serves as an officer or in some decision-making capacity. Kathy, though, should consider whether she can make a fair decision based on the merits of the application given her involvement with the center. If she cannot make a fair decision, she must recuse herself under the unfair advancement of private interests provision and ask her supervisor to reassign the matter.



GIFTS

There are two rules regarding the receipt of gifts by city employees under the Ethics Code.

Gift Rule 1. A city employee cannot ask for or accept a gift which is given for the purpose of influencing the employee to take a certain action in their role as a city employee.

Gift Rule 2. A city employee cannot ask for or accept gifts from:

- A. A person or entity which is doing or seeking to do business with the city;
- B. A registered lobbyist;
- C. A person or entity which is seeking action on a zoning or platting matter before the city.

There are exceptions to Gift Rule 2:

- 1. Items of nominal value (\$50 or less);
- 2. A meal up to \$50 (\$500 limit during a calendar year for meals paid for by a single source);
- 3. A reasonable gift for a personal occasion in keeping with the employee's non-city relationship with the giver;
- 4. Admission to an event to which your spouse has been invited because of your spouse's position;
- 5. Gifts received for civic or charitable causes;
- 6. Reasonable awards for meritorious service;
- 7. Reimbursement or payment of travel costs related to business purpose.
(Requires Travel Report to be filed with City Clerk).

In addition to the Travel Report, an employee who chooses to accept a gift or expenditure under these exceptions or whose family members accept such gifts may be required to disclose the gift in an annual disclosure report. See the Financial Disclosure section of this handbook, or contact the Office of the City Attorney at (210) 207-8940 for information.



GIFTS

Examples:

Lucinda works in the Purchasing and General Services Department. Roland from Big Company Office Supplies stops by occasionally and tries to persuade Lucinda to get the city to start ordering their paper supplies from Big Company. Lucinda knew Roland back in high school, but not well. One day, Roland asked Lucinda if he could take her to lunch to discuss Big Company's catalog of products. Lucinda may accept the meal if it is worth \$50 or less.

During the lunch, Roland told Lucinda that he would give her a laptop computer for her own use if she agreed to purchase Big Company products for the city. Under Gift Rule 1, Lucinda cannot accept this gift, regardless of the value because Roland is offering it to her in exchange for her agreement that the city will purchase products from Big Company.

Ned works for another city department. Roland from Big Company has been Ned's close friend since high school. They have traditionally exchanged Christmas gifts and attended the special occasions of one another's family. Even though Roland is a person seeking business with the city, he and Ned can continue to exchange the same types of gifts they have traditionally given to one another on special occasions.

However, Roland has now approached Ned and offered to take him to lunch to discuss the Big Company's products and to provide him with a laptop in exchange for helping Big Company do business with Ned's department. Like Lucinda, Ned cannot accept the laptop under Gift Rule 1 because it is being offered in exchange for his agreement to help Big Company get business. Ned should also be careful about being involved in this sales decision at all under the rule prohibiting the Unfair Advancement of Private Interests since his personal relationship with Roland may make it difficult for Ned to make such decisions on the merits.



PROHIBITED CONTRACTS

For officials and higher-level employees, the City Charter and the Ethics Code impose an additional standard of conduct which prohibits the employee or his or her family or their businesses from having a business relationship with the city. This rule applies to employees who are required to file annual financial disclosure statements under Section 2-73 of the Ethics Code. It does not apply to other employees.

The penalty for a willful violation is forfeiture of the employee's position with the city. The contract also becomes voidable by the City Council or City Manager. This is not a conflict-of-interest rule. Recusal or non-participation in the matter does not cure the violation.

This rule states that a city employee cannot have a "prohibited financial interest" in a contract with the city. A prohibited financial interest includes:

- A contract with the city in which the employee, a parent, child, sibling or spouse, or any other first-degree relative is a party;
- A contract in which the employee, parent, child, sibling or spouse, or any other first-degree relative owns 10% or more of a business which is a party;
- A contract in which any of these individuals or businesses is a subcontractor, a partner or a parent or subsidiary business on a city contract.

An application can be made to the Ethics Review Board for a determination that a prohibited interest does not exist. Please contact the Office of the City Attorney for information or an advisory opinion on this rule.

Example:

Ellen is an executive secretary who must file an annual financial disclosure statement. Ellen's mother, Nancy, has a catering business and would like to seek a contract with the city to provide dinners for evening board meetings. Nancy's contract with the city would create a "prohibited financial interest" for Ellen. It does not matter that Ellen has no involvement in the selection or use of the catering service.



MISUSE OF PUBLIC RESOURCES

City employees cannot use or permit the use of city facilities, personnel, equipment, supplies or time while on city duty for private purposes, including political activity. City employees, though, may use city facilities on the same terms and conditions as any member of the public.

Examples:

Louis would like to use a city computer to write letters to his friends and to update his resume. Louis may not use the computer for this purpose even if he is using it outside his regular duty time. Louis, however, may use the computer at the city library which has been made available to all members of the public.

Tina would like to use the city motor pool truck to move some furniture to her house on the weekend. Even though she plans to fill the tank with gas with her own money, Tina cannot use the motor pool truck for this personal purpose.

CONFIDENTIAL INFORMATION

City employees cannot reveal confidential information unless 1) the information is public, or 2) the employee is revealing illegal or unethical conduct to the proper authorities for legal attention. (“Proper authorities” do not include members of the media).

Examples:

Amy is reviewing files from the Public Health Department to inventory them so they can be sent to the municipal archives. Within the files, she sees that the husband of a friend of hers has been received medication for depression. Amy cannot discuss this matter with her friend.

Marc has been assisting his department director in drafting paperwork related to a real estate transaction that the city is in the process of negotiating. Marc learned that the city is willing to spend a certain amount of money to obtain the property. A reporter has asked Marc to give some indication on how much the city might spend on the property. Marc cannot reveal any details during the negotiations.



CONFLICTING OUTSIDE EMPLOYMENT

City Personnel Rules require employees to obtain written approval from their department director to accept outside employment.

In addition, under the Ethics Code, an employee cannot accept outside employment that is related to the employee's duties for the city or which would potentially impair the employee's judgment or faithful performance of his or her city duties.

Example:

Melvin works for the Office of the City Attorney and has assisted in drafting a contract between Big Company, Inc. and the city. Roland from Big Company has asked Melvin if he would be interested in working for Big Company on weekends on a contract basis to perform some book-keeping work in relation to the contract. Melvin must not accept this employment because it is directly related to work he is doing for the city and because there is a substantial likelihood that his judgment or faithful performance of his city duties pertaining to this contact might be affected.

REPRESENTATION OF PRIVATE INTERESTS BEFORE THE CITY

A city employee cannot represent a private interest before the city for compensation. Also, employees cannot assert or imply that he or she is able to influence city action on any basis other than the merits.

In addition, city employees cannot represent any person or entity other than himself or herself and family members in litigation against the city where the interests of that person or group is adverse to the city.

Example:

Donna, an employee with the Municipal Court, and members of her neighborhood association are concerned about the city's plans to widen the road in front of her children's elementary school. Donna may attend the Planning Commission meeting to speak on behalf of herself and her association regarding the street plans. She cannot, however, make such a presentation for money or other compensation. She must also attend the meeting during non-duty hours or arrange leave with her supervisor.



POLITICAL ACTIVITY

Political activity by city employees is limited by the City Charter, Administrative Directives and City Personnel Rules, especially in connection with elections for San Antonio City Council. In addition, the Ethics Code prohibits a city official or employee from inducing any subordinate to participate in or to refrain from any lawful political activity.

City personnel cannot accept any thing of value for political activity relating to an item pending on the ballot if he or she participated in the development of the ballot item. City personnel are also prohibited from displaying any campaign materials on any city vehicle.

Please review the Charter, Administrative Directives and the Personnel Rules regarding participation in political activity. You may also contact the Office of the City Attorney for information or an advisory opinion on whether specific political activity is prohibited or allowed.

Example:

Joe's brother is running for school board. Joe supervises a number of employees who live in that school district. Joe cannot do or say anything to suggest to the individuals he supervises that they should consider his brother as a candidate for school board.

ACTIONS OF OTHERS & DUTY TO REPORT VIOLATIONS

Employees cannot intentionally or knowingly assist or induce any person to violate any provision in the Code of Ethics, nor can an official or employee violate the code through the acts of another.

The Ethics Code also requires that a city employee who has knowledge of a violation of the code must report the violation to the Office of the City Attorney or the Ethics Review Board.



RESTRICTIONS ON FORMER EMPLOYEES

Four provisions in the Ethics Code apply to employees who have left city service which are summarized below. A separate handbook has been prepared to discuss these rules in greater depth and to provide examples of their application to former employees. Please review the Handbook for Former Officials and Employees on the city's ethics webpage or contact the Office of the City Attorney for additional information or guidance.

Rules for Former Employees:

1) **Continuing Confidentiality** (*Permanent Restriction*)

Former employees cannot reveal or use confidential information learned or obtained through employment with the city.

2) **Prohibited Contracts** (*One-Year Restriction*)

Former employees who were required to file financial disclosure statements while employed with the city, their immediate family members or businesses owned by former employees or members of their family are prohibited from seeking discretionary contracts with the city for one year after leaving city service.

If you are a former employee who filed annual financial disclosure statements and you or a family member or a business owned by you or your family members wishes to seek a discretionary contract with the city less than one year after you have left city service, please consult the Office of the City Attorney for additional information or guidance.

3) **Subsequent Representation of Private Interests Before the City**

a) **Representation of Private Interests before the City** (*Two-Year Restriction*)

A former city employee cannot represent for compensation a person, or private group or entity before city staff or officials for a period of two years after leaving city service.



b) Influence (*Permanent Restriction*)

A former city employee cannot use or imply that he or she can affect city action for the benefit of another because of his or her former position with the city.

c) Litigation Against the City (*Permanent Restriction*)

A former city employee cannot represent anyone except himself or herself or immediate family members in any litigation involving the city if the matter relates to duties in which the employee substantially and personally participated as a city employee and the interests of the party are adverse to the city.

4) **Prior Participation in the Negotiation, Award or Administration of Discretionary City Contracts** (*Two-Year Restriction*)

A former city employee cannot work for compensation on a discretionary city contract for two years after leaving city service if he or she personally and substantially participated in the award, negotiation or administration of the contract.

City Contracts in which the Former Employee did not Participate:

If the former employee would like to accept work or employment for compensation regarding a discretionary contract with the city, and that former employee did not participate in the negotiation, award or administration of the contract, the former employee may accept that employment but must notify the City Clerk in writing. This requirement is imposed for **two years** after the employee leaves city service.

The notification to the City Clerk must state:

- 1) the contract at issue;
- 2) the individual's former position with the city;
- 3) a statement by the former employee that he or she did not participate in the award, negotiation or administration of the contract as a city employee.



RULES FOR CONTRACTORS

“CONE OF SILENCE”

Individuals or entities seeking contracts with the city and those acting on their behalf are prohibited from communicating with city officials or staff about the contract from the time the solicitation is released until the contract is posted as a City Council agenda item.

PROHIBITED CAMPAIGN CONTRIBUTIONS AND “HIGH PROFILE” CONTRACTS & ZONING APPLICANTS

Individuals seeking **high-profile** contracts, the owners or officers of entities seeking high-profile contracts, the legal signatories for high-profile contracts, any spouse of these individuals, or attorneys, lobbyists or other consultants retained to assist in seeking high-profile contracts cannot make campaign or officeholder contributions **from** the 10th business day after a solicitation is released until 30 calendar days after the contract has been awarded. Zoning applicants and their spouses are also prohibited from making contributions from the date the application is submitted until 30 calendar days after final action.





REPORTING REQUIREMENTS

Travel Reports

With approval of their department director, city employees may accept payment of or reimbursement for reasonable expenses for travel related to city business. However, if these expenses are paid by a non-governmental source, the employee must submit a Travel Form before leaving on the trip.

The travel form lists:

- 1) the name of the person or entity paying the expenses;
- 2) the place the employee will visit;
- 3) the purpose and dates of the travel;
- 4) the estimated amount of the expenses paid.

The form must be signed by the employee and approved by the employee's department director.

Gifts and Other Annual Financial Disclosure Reports

Certain management level employees are required to fill out an annual financial disclosure report listing family members, businesses owned by the employee or family members and gifts. Other employees, referred to as "specified employees," must also file an annual gift report. These reports are due by January 31st or the next business day if January 31st is not a regular business day. If you are uncertain about whether you are subject to these gift report or financial disclosure requirements, please contact the Office of the City Clerk.

These employees must report the receipt of any gift worth more than \$100 in value received during the preceding calendar year.



Exceptions:

- 1) Gifts from family members within the second degree (see family chart on the inside back cover);
- 2) Gifts based on personal friendship (i.e. relationships not stemming from interactions with a person as a city employee), so long as the gift giver has not sought or done city business or action in the preceding three years and that person is not associated with any business or entity that has sought city business or action in the preceding three years;
- 3) Admission to events attended in an official capacity;
- 4) Gifts exchanged between city personnel;
- 5) Travel expenses reported on travel report (see Travel Reports on previous page).

Recusal for Conflicts of Interest

If an employee discovers in the course of handling some matter as a city employee that he or she has a conflict of interest, the employee must advise his or her supervisor of the conflict, and must file a conflict of interest recusal form.

Forms for Travel and Gift Disclosure reports are available on the city's Ethics webpage at www.sanantonio.gov/ecfl, the Office of the City Clerk or the Office of the City Attorney





ADVISORY OPINIONS AND ETHICS COMPLAINTS

Advisory Ethics Opinions

Any city official or employee may request an advisory ethics opinion from the Office of the City Attorney regarding that person's own actions. An employee cannot ask for an advisory opinion regarding another person's conduct. A person who reasonably and in good faith acts in accordance with an opinion issued by the Ethics Compliance Officer may not be found to have violated the ethics laws by engaging in conduct approved in the advisory opinion, provided that the request fairly and accurately discloses all relevant facts.

Some advisory opinions are posted on the city's ethics Webpage in a manner that does not reveal the identity of the person making the inquiry. You may call the Office of the City Attorney for more information. See contact information listed in the Introduction section of this handbook.

Ethics Complaints

The Ethics Review Board has the jurisdiction to review allegations of violations of the city's Ethics Code, Section 141 of the City Charter and Section 171 of the Texas Local Government Code. The Ethics Review Board does not have the jurisdiction or the authority to review allegations of violations of other bodies of law, nor is it charged with resolving disputes with the city that do not pertain to the Ethics Code. The board cannot consider any alleged violation that occurred more than two years prior to the date of the filing of a complaint.

Procedure to File an Ethics Complaint.

Any person who believes there has been a violation of the ethics laws should file a sworn complaint. The sworn ethics complaint must be filed in the City Clerk's Office and addressed to the Ethics Review Board. Address and contact information is listed in the Introduction section of this handbook. The complaint must include:

- 1) the name of the complainant;
- 2) the mailing address and contact telephone number of the complainant;
- 3) the name of each person complained about;
- 4) the position or title of each person complained about;
- 5) the nature of the alleged violation, including the specific rule or provision of law alleged to have been violated.



- 6) a statement of facts describing the alleged violation and the dates during which the alleged violation(s) occurred; and
- 7) any documents or other material available to the complainant that are relevant to the allegation.

Response to a Complaint

Any employee against whom a complaint has been filed will be notified by the Office of the City Clerk and will be provided an opportunity to respond. Ethics Review Board complaint procedures are found in Division 8 of the Ethics Code.

Sanctions

Possible sanctions that may be imposed in the event the Ethics Review Board determines that an individual has committed a violation of the Ethics Code:

- Civil fine of up to \$500;
- Referral to Ethics training;
- Letter of Notification;
- Letter of Admonition;
- Letter of Reprimand;
- Referral for Disciplinary Action under Personnel Rules;
- Debarment from Lobbying or Contracting;
- Voiding or Modification of Contracts;
- Suit for Damages or Injunctive Relief.

Information

You are welcome to contact the ethics attorneys at the Office of the City Attorney at (210) 207-8940 or the Office of the City Clerk at (210) 207-7253 concerning any questions you may have regarding the city's Ethics Code. Please see the Introduction section of this handbook for contact and resource information and the city ethics website at www.sanantonio.gov/ecfl. A family relationship chart explaining the degrees of relatives is included on the inside back cover of this handbook.



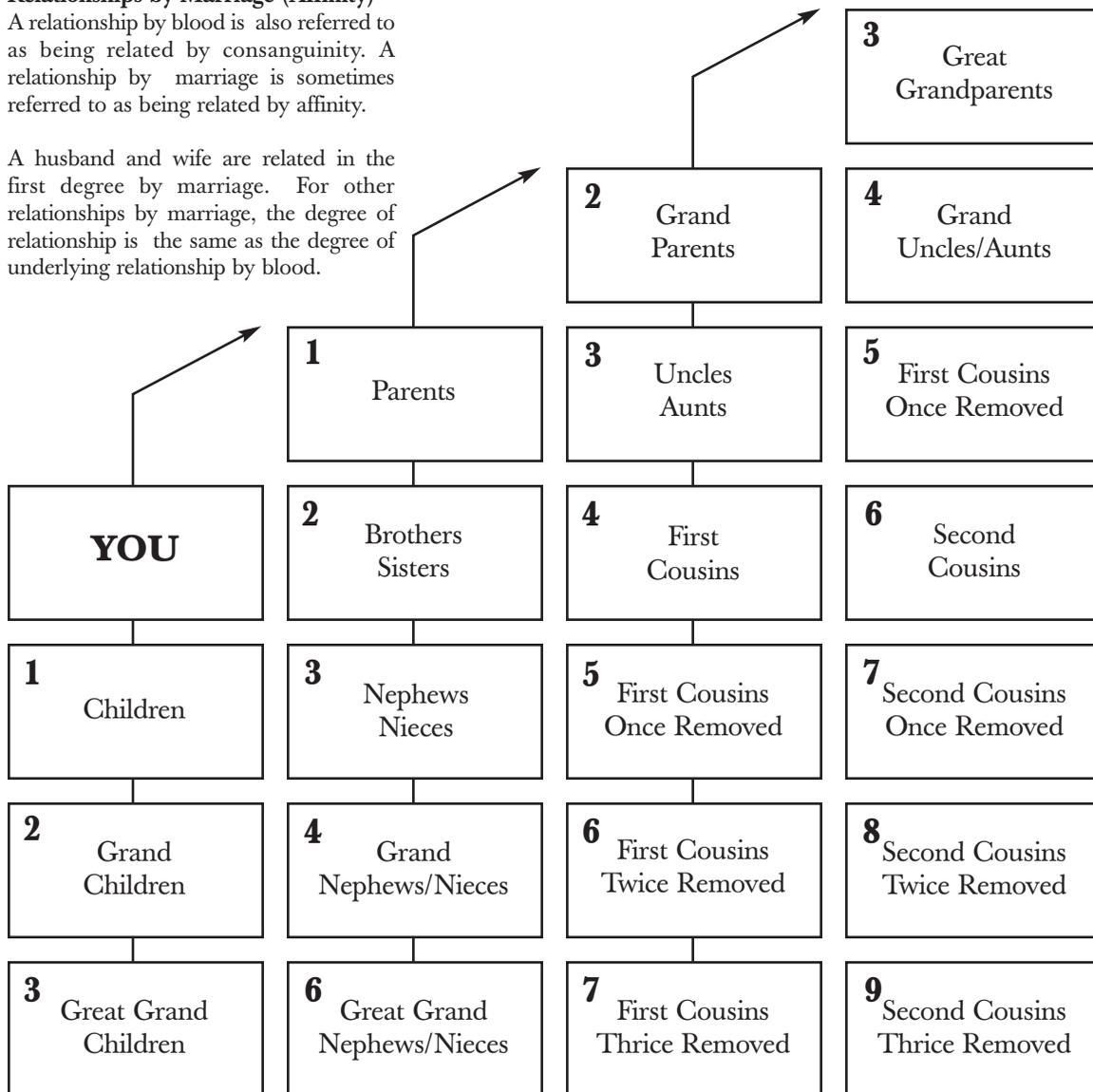
DEGREES OF FAMILY RELATIONSHIPS

Relationships by Blood (Consanguinity)

Relationships by Marriage (Affinity)

A relationship by blood is also referred to as being related by consanguinity. A relationship by marriage is sometimes referred to as being related by affinity.

A husband and wife are related in the first degree by marriage. For other relationships by marriage, the degree of relationship is the same as the degree of underlying relationship by blood.





Office of the City Attorney
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