

Ethics Office Tracking and Records Retention Policy

The Ethics Office at Metropolitan appreciates the tension between the need for confidentiality in the reporting of concerns and the importance of conducting the public's business in as transparent a manner as possible. This policy relating to tracking ethics concerns strives to respect both.

All expressions of concern to the Ethics Office must be made in writing, either as a report filed through a phone interview with the Network or directly to the Ethics Office through e-mail or written document. The Intake and Administrative Liaison will log the concern in a timely manner into the electronic secure logging/tracking/reporting system. Information and concern processing will be summarized with no identifying information. New information and fact-finding will be entered into the logging/tracking/reporting system. The information contained in the logging/tracking/reporting system is secured upon entry and cannot be erased.

Written documentation and relevant e-mail exchange will be maintained as work in progress prior to the determination of a disposition for the expression of concern and for 30 days following notification of the disposition to the person expressing concern.

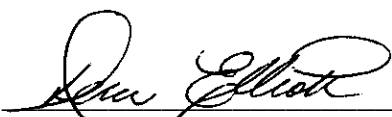
Requests for reconsideration and/or follow up material should be supplied to the Ethics Office within 30 days following notification of the disposition. If no request or follow up is filed, all non-material written documentation will be shredded and all non-material electronic exchange will be erased. The information contained in the logging/tracking/reporting system, and the material documentation, will serve as the record for expressions of concern.

In the event that a concern is referred to the Inquiry & Review Committee for formal review, all documentation will be retained in hard copy and electronic form for use in further investigation, and will be maintained in a permanent file.

Matters brought to the Ethics Office are de-identified and reported in the Ethics Officer's monthly written report when pending and once after the matter has been closed.

Other e-mail exchange with the Ethics Office will be purged quarterly, unless there is a business need for longer retention. All other records will be retained according to Records Management Policy, Operating Policy, B-03.

April 25, 2011



Deni Elliott
Ethics Officer