



Metro

Los Angeles County
Metropolitan Transportation
Authority
One Gateway Plaza
3rd Floor Board Room
Los Angeles, CA

Board Report

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Agenda Number: 21.

EXECUTIVE MANAGEMENT COMMITTEE MARCH 19, 2026

SUBJECT: ADOPTION OF CODE OF CONDUCT FOR METRO ADVISORY BODIES

ACTION: APPROVE RECOMMENDATION

RECOMMENDATION

APPROVE amendment of Title 5 (Ethics) of Metro's Administrative Code to include the "Code of Conduct for Metro Advisory Bodies" (Attachment A), applicable to all members of Metro's advisory bodies.

ISSUE

Metro's advisory bodies provide important input and advice to Metro staff and the Board of Directors on a range of policy, planning, operational, and community issues. Currently, there is no unified, formal Code of Conduct that applies consistently across all Metro advisory bodies.

The absence of a clear, uniform standard can lead to inconsistent expectations, uncertainty in addressing misconduct, and potential risk to Metro's reputation and to the effectiveness of advisory bodies. Further, and most significantly, written expectations on professionalism to maintain a respectful and productive environment will minimize opportunities for misconduct by advisory body members. This Code helps ensure that disruptive activity is minimized so that advisory body members and Metro Staff are not subject to unwarranted, unwelcome, and problematic behavior that creates liability for Metro.

BACKGROUND

Metro's advisory bodies, including but not limited to: the Community/Citizens' Advisory Council, Transportation Business Advisory Council, Technical Advisory Committee and its subcommittees, Public Safety Advisory Committee, Accessibility Advisory Committee, Sustainability Council, Policy Advisory Council, Public Liability/Property Damage Claims Committee, Metro Youth Council, and Community Leadership Councils, play an important role in advising Metro.

These bodies are advisory only; they do not make governmental decisions under state law. Because of this fact, Metro advisory bodies historically have not had a uniform and consistent code of conduct apply to them in the same way that Metro employees, contractors, and Board Members do. Nonetheless, advisory body members often engage directly with the public, Metro staff, and the

Board, and their conduct can shape public perception of Metro and influence the effectiveness of Metro actions.

Metro employees and Board Members are already subject to a professional code of conduct through Metro's existing codes and related agency policies. The absence of a comparable framework for advisory bodies creates an inconsistency in expectations despite the important role these bodies play in Metro governance and public engagement.

Public Utilities Code § 130610 directs the Chief Ethics Officer to create agency codes of conduct that are subject to approval by the Metro Board.

DISCUSSION

The proposed Code of Conduct (Attachment A) is intended to:

- Establish clear expectations for professionalism and conduct in all advisory body activities, including maintaining a safe, respectful, and productive environment.
- Affirm Metro's commitment to nondiscrimination by prohibiting derogatory or offensive comments related to protected characteristics during advisory body work.
- Address abusive conduct by requiring respectful treatment of Metro employees, advisory body colleagues, and members of the public, and prohibiting egregious verbal attacks.
- Clarify expectations regarding confidential information, prohibiting its use or disclosure except in the performance of advisory body duties.
- Define appropriate use of Metro resources, ensuring that facilities, materials, equipment, information, intellectual property, and staff time are used solely in connection with advisory body duties.
- Establish the Code as controlling over any conflicting advisory body bylaw that is currently in effect.
- Provide a process for suspension and removal of members who violate the Code.
- Assign the Ethics Officer responsibility for advising on ethical issues and questions involving interpretation and application of the Code - something advisory bodies have historically requested.

While the Code establishes clear standards and enforcement mechanisms, Metro's intent is to address most concerns through de-escalation and corrective guidance. Staff will typically seek to resolve issues informally by reminding members of the Code and encouraging respectful participation before pursuing formal disciplinary processes. Escalation to suspension or removal would generally occur only if problematic conduct continues after these efforts or involves serious misconduct.

Notably, the Ethics Department conducted extensive research across many jurisdictions in California to inform standards set in the proposed Code. As an example, many of the general principles mirror the Bay Area Rapid Transit's (BART) advisory body code.

DETERMINATION OF SAFETY IMPACT

This action will not have a direct impact on the safety of Metro employees or customers; however, it will improve the professional work environment for Metro advisory bodies, Metro employees, and the public.

FINANCIAL IMPACT

Adoption of this Code of Conduct will not have a financial impact. Implementation will be carried out using existing staff resources as part of advisory body administration and Ethics Department compliance functions.
No additional funding is required.

EQUITY PLATFORM

The adoption of this Code supports the “Train and Grow” pillar of Metro’s Equity Platform by creating standards of conduct that set universal expectations regarding nondiscrimination to ensure a safe, inclusive environment not only for a diverse advisory body membership but also for Metro staff.

VEHICLE MILES TRAVELED OUTCOME

VMT and VMT per capita in Los Angeles County are lower than national averages, the lowest in the SCAG region, and on the lower end of VMT per capita statewide, with these declining VMT trends due in part to Metro’s significant investment in rail and bus transit.* Metro’s Board-adopted VMT reduction targets align with California’s statewide climate goals, including achieving carbon neutrality by 2045. To ensure continued progress, all Board items are assessed for their potential impact on VMT.

While this item does not directly encourage taking transit, sharing a ride, or using active transportation, it affects Metro operations, as it will encourage Metro’s advisory bodies to meet in a professional environment, increasing membership and participation without increasing VMT. Because the Metro Board has adopted an agency-wide VMT Reduction Target, and this item supports the overall function of the agency, this item is consistent with the goals of reducing VMT.

*Based on population estimates from the United States Census and VMT estimates from Caltrans’ Highway Performance Monitoring System (HPMS) data between 2001-2019.

IMPLEMENTATION OF STRATEGIC PLAN GOALS

Goal #5: Provide responsive, accountable, and trustworthy governance within the Metro organization.

ALTERNATIVES CONSIDERED

Do Not Adopt a Formal Code of Conduct: Under this alternative, advisory bodies would continue to operate without a unified code. This is not recommended because it would maintain inconsistent expectations across bodies and limit Metro’s ability to respond consistently to misconduct.

NEXT STEPS

If the Board approves the recommendation, Title 5 of Metro's Administrative Code will be amended to include this Code of Conduct. Staff will distribute the Code to all advisory body members and include it in all future appointment and onboarding processes. Advisory Bodies will also have the opportunity to review, ask questions, and receive training on the Code. Staff in consultation with the Chief Ethics Officer, will finalize internal procedures for documenting alleged violations, initiating suspensions, and coordinating with nominating authorities on removal decisions.

ATTACHMENT

Attachment A - Exhibit A: Code of Conduct for Advisory Bodies

Prepared by: Paul Solis, Chief Ethics Officer (213) 922-2944

Reviewed by: Paul Solis, Chief Ethics Officer, (213) 922-2944

A handwritten signature in black ink, appearing to read "Paul Solis", is positioned below the "Reviewed by:" line.

Chapter 5-40 Code of Conduct for Advisory Bodies

5-40-010 Applicability – MTA Advisory Bodies provide input and advice to the MTA and its Board of Directors. Since these bodies are advisory only, the actions and statements of Advisory Body Members do not reflect the official positions or policies of the MTA. This Code of Conduct applies to all members, including both voting and non-voting members as well as individual representatives of member organizations, of the MTA's Advisory Bodies.

The Advisory Bodies include, but are not limited to, the Community/Citizens' Advisory Council, Transportation Business Advisory Council, Technical Advisory Committee and its subcommittees, Public Safety Advisory Committee, Accessibility Advisory Committee, Sustainability Council, Policy Advisory Council, Public Liability/Property Damage Claims Committee, Metro Youth Council, and Community Leadership Councils. This Code applies to these Advisory Bodies as well as to any future Advisory Body which is created by state law or MTA action.

5-40-020 Professionalism – Members of Advisory Bodies shall conduct themselves in a manner consistent with the law, this Code of Conduct, MTA policies, and good judgment. Members shall not commit any act which may discredit the MTA or the Advisory Body. Speech or behavior that is likely to create an appearance of impropriety shall be avoided. Members shall not involve themselves in altercations or any other act of hostility with MTA employees, other Advisory Body members, or the public. Members shall not obstruct, delay, interfere, or otherwise impair the required operations of the Advisory Body. It is up to each member to maintain a professional, safe and productive environment.

5-40-030 Nondiscrimination – Members shall refrain from making derogatory or offensive comments, including those with any relation to race, color, religion, national origin, sex, age, physical disability, ancestry, mental disability, medical condition, marital status, sexual orientation, gender identity, gender expression, military and veteran status, genetic information, reproductive health decision-making, or any other classification similarly protected under relevant federal or state law, or other comments of a sexual nature during an Advisory Body meeting or relating to an Advisory Body's work.

5-40-040 Abusive Conduct – Members shall treat MTA employees, colleagues on the Advisory Body, and the public with respect and courtesy at all times. Members shall refrain from abusive conduct, including repeated or egregious verbal attacks, upon the character, motives, ethics, or morals of other members of the Advisory Body, other Advisory Bodies, MTA staff, MTA Board Members, members of the public, or anyone attending an Advisory Body meeting. This includes comments or behavior of a harassing nature, including but not limited to sexual, racial, or gender-based comments.

5-40-050 Conflicts of Interest – Members shall refrain from taking any action on any matter in which their personal interests or relationships existing outside the Advisory Body may impair their objectivity in conducting Advisory Body work. This section is not meant to restrict or prohibit associations and experience members may have with outside organizations or individuals which form a basis for the member's selection to the Advisory Body.

5-40-060 Suspension and Removal – Any member who violates this Code of Conduct may be suspended by the CEO or their designee after consultation with the Chair or Vice Chair of the Advisory Body. The nominating authority for the suspended member shall consult with the CEO or their designee and the Advisory Body Chair or Vice Chair to review the member's misconduct and determine whether the conduct justifies removal from the Advisory Body. Until the nominating authority makes such a determination, the suspended member may not participate on the Advisory Body. No member shall be suspended or removed without cause. MTA staff shall inform the Ethics Officer of any instance of any member's noncompliance with this Code of Conduct and the Ethics Officer may advise MTA accordingly.

5-40-070 Confidential Information – Advisory Body members shall not use or disclose, other than in the performance of their official duties and responsibilities (or as may be required by law), confidential MTA information.

5-40-080 Use of MTA Resources – Advisory Body members shall not use or permit the use of MTA resources, including but not limited to facilities, materials, equipment, information, intellectual property such as trademarks and copyrighted material, and MTA staff time, for activities other than the performance of their duties as Advisory Body members.

5-40-090 Bylaws – In the event this Code of Conduct conflicts with any Advisory Body's bylaws, this Code shall control. Nothing in this Code is intended to limit Advisory Bodies from implementing other removal procedures for matters unrelated to this Code, such as for attendance or neglecting duties.

5-40-100 Interpretation – The Ethics Officer is charged with advising the MTA regarding ethical issues and questions involving the interpretation and application of this Code of Conduct.

Code of Conduct for Metro Advisory Bodies



Metro

**PAUL SOLIS, CHIEF ETHICS OFFICER
EXECUTIVE MANAGEMENT COMMITTEE
MARCH 19, 2026**

Recommendation



Amend Title 5 (Ethics) of Metro's Administrative Code to include the attached "Metro Advisory Bodies Code of Conduct" (Attachment A), applicable to all members of Metro's advisory bodies.



- The Ethics Dept. conducted extensive research across many jurisdictions in California to inform standards set in the proposed Code. As an example, many of the general principles mirror the Bay Area Rapid Transit's (BART) advisory body code.
- State law directs the Chief Ethics Officer to create agency Codes of Conduct subject to Board approval.
- The Ethics Dept. has met with, and answered questions from, advisory body leadership on the proposed Code.



- LA Metro's advisory bodies provide important input and advice to Metro staff and the Board of Directors on a range of policy, planning, operational, and community issues.
- Currently, there is no unified, formal Code of Conduct that applies consistently across all Metro advisory bodies, in the same manner as Codes applicable to other Metro groups (contractors, lobbyists, employees, service councils, and Board Members).
- Further, and most significant, misconduct by advisory body members can inhibit and disrupt important advisory functions and subject Metro staff and advisory body members to unwarranted, unwelcome, and problematic behavior that creates risk and liability for Metro.



The proposed Code of Conduct will:

- Establish clear expectations for professionalism.
- Affirm Metro's commitment to nondiscrimination.
- Address abusive conduct by requiring respectful treatment and prohibiting egregious verbal attacks.
- Clarify expectations regarding confidential information.
- Define appropriate use of Metro resources.
- Provide a process for suspension and removal of members who violate the Code.
- Assign the Ethics Officer responsibility for advising on ethical issues and questions involving interpretation and application of the Code – something advisory bodies have historically requested.