



# Accountability Hotline Case 495:

*Prioritize ethical requirements to set the reuse program up for success*

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October 2025

A Report by the Office of the Auditor

**Brian Evans**  
*Metro Auditor*

### **Metro Accountability Hotline**

The Metro Accountability Hotline gives employees and citizens an avenue to report misconduct, waste or misuse of resources in any Metro or Metro Exposition Recreation Commission (MERC) facility or department.

The Hotline is administered by the Metro Auditor's Office. All reports are taken seriously and responded to in a timely manner. The auditor contracts with a hotline vendor, EthicsPoint, to provide and maintain the reporting system. Your report will serve the public interest and assist Metro in meeting high standards of public accountability.

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## MEMORANDUM

October 1, 2025

To: Lynn Peterson, Council President  
Ashton Simpson, Councilor, District 1  
Christine Lewis, Councilor, District 2  
Gerritt Rosenthal, Councilor, District 3  
Juan Carlos Gonzalez, Councilor, District 4  
Mary Nolan, Councilor, District 5  
Duncan Hwang, Councilor, District 6

From: Brian Evans, Metro Auditor

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**Re: Accountability Hotline Case 495 Audit**

An anonymous report to the Accountability Hotline in May 2025 alleged that a Household Hazardous Waste employee at Metro's Central Transfer Station took a laptop and other electronic waste that was dropped off by customers. The employee stated that they thought they were allowed to take materials as part of the Reuse Standard Operating Procedure (SOP).

The Human Resource investigation of the incident concluded that no policy violations occurred despite the Office of the Metro Attorney sharing concerns about non-compliance with the SOP and ethics requirements. The investigation showed a willingness to prioritize past practices over existing policies and Metro Code requirements.

This audit was initiated to determine if the SOP was aligned with ethical requirements and whether electronic waste management procedures were followed. The audit found that employee reuse violated ethical requirements that prohibit public officials from using their position for financial gain or to avoid financial costs. In addition to not being aligned with ethical requirements, the SOP was not followed.

I have discussed the report with the Chief Operating Officer, Deputy Chief Operating Officer, Human Resources Director, and Waste Prevention and Environmental Services Deputy Director. I would like to thank them and all the other employees for their assistance and cooperation during the audit.

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## Summary

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An anonymous report to the Accountability Hotline in May 2025 raised concerns about how Metro followed handling protocols for electronic waste, especially items that may contain personal information. The report alleged that a Household Hazardous Waste (HHW) employee at Metro's Central Transfer Station took a laptop and other electronic waste that was dropped off by customers.

Human Resources investigated the allegations in June 2025. The investigation confirmed the series of events described in the report. The employee stated that they thought they were allowed to take materials as part of the Reuse Standard Operating Procedure (SOP). The Office of Metro Attorney concluded that the incident did not appear to follow the SOP and probably did not meet ethical requirements. Despite this, the investigation report concluded that no policy violations occurred.

The investigation showed a willingness to prioritize past practices over existing policies and Metro Code requirements. When management does not take prompt action it increases risks for Metro and its employees. It also risks damaging public trust in Metro's solid waste services.

This audit was initiated to determine if the SOP was aligned with ethical requirements and whether electronic waste management procedures were followed. The audit found that employee reuse violated Metro Code and the Employee Ethics policy. The SOP also increased the chance that a Metro employee could violate Oregon law. All three prohibit public officials from using their position for financial gain or to avoid financial costs.

In addition to not being aligned with ethical requirements, the SOP was not followed. The laptop and other electronic waste were not approved materials for reuse. In some cases, employees did not get approval for the items they took, and employee liability waivers were more than a year old. These discrepancies showed that several layers of management in Waste Prevention and Environmental Services did not provide effective oversight.

Besides ethical and compliance risks, stronger oversight of the reuse program was needed to ensure Metro's services were transparent to the public. For example, Metro's services for electronic waste state that it will be recycled, not reused. As such, customers should rightly be concerned if material they drop off is not recycled. Similarly, if hazardous materials are reused, a customer may feel misled if it is given to someone who may not dispose of it properly.

The audit included six recommendations. Four were designed to strengthen controls for the reuse program. Three focused on improving compliance with ethical requirements.

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## Background

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In late May 2025, an anonymous report was made to the Accountability Hotline. The report alleged that a Household Hazardous Waste (HHW) employee at Metro's Central Transfer Station took a laptop and other electronic waste that was dropped off by customers. The laptop was later reported stolen after it was tracked to a residence.

The person who made the hotline report raised concerns about how Metro followed handling protocols for electronic waste, especially items that may contain personal information. The report said the situation undermined public confidence in Metro's stewardship of sensitive waste materials.

Metro provides free electronic waste recycling at its Central and South Transfer Stations. Electronic waste was supposed to be managed by Metro's contractor at each station. The contractor collects that material and delivers it to a recycling facility in Clackamas. Each transfer station also has an HHW facility. The Metro employees who work there sometimes accept electronic waste as a courtesy for customers. Managers said that any electronic waste collected at the HHW facility was supposed to be given to the transfer station operator.

Human Resources investigated the hotline report in June 2025. The investigation confirmed the series of events described in the report. The employee admitted taking the laptop and other electronic waste. A police report confirmed that the laptop was reported stolen and was recovered at the employee's residence. The employee stated that they thought they were allowed to take materials as part of the Reuse Standard Operating Procedure (SOP). The employee's manager stated that the employee followed the SOP. Human Resources concluded that no policy violations occurred.

This audit was initiated to determine if the SOP was aligned with ethical requirements and whether electronic waste management procedures were followed. State law, Metro Code, and Metro's Employee Ethics policy prohibit public employees from using their position for financial benefit or to avoid financial costs. The Office of Metro Attorney raised ethical concerns with leadership in Waste Prevention and Environmental Services and Human Resources on or before July 2, 2025. These concerns were not mentioned when Human Resources concluded its investigation on July 7, 2025.

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## Results

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Employee reuse of household hazardous waste violated Metro Code and the Employee Ethics policy. It also increased the chance that employees could be found liable for violating Oregon law. In addition to not being aligned with ethical requirements, the Reuse Standard Operating Procedure (SOP) was not followed.

Besides ethical and compliance risks, stronger oversight of the reuse program was needed to ensure Metro's services were transparent to the public. Although several layers of management in Waste Prevention and Environmental Services (WPES) and Human Resources (HR) were aware of ethical concerns related to employee reuse practices, they were not paused until after the entrance meeting for this audit.

Effective management sets up employees and the organization for success. It requires consistent processes and procedures to prevent, detect, and correct inappropriate practices. As Metro seeks to refocus waste management toward greater reuse, effective implementation of environmental, financial, and legal standards will be critical to build public trust.

### Employee reuse violated Metro's Ethics Code and Employee Ethics policy

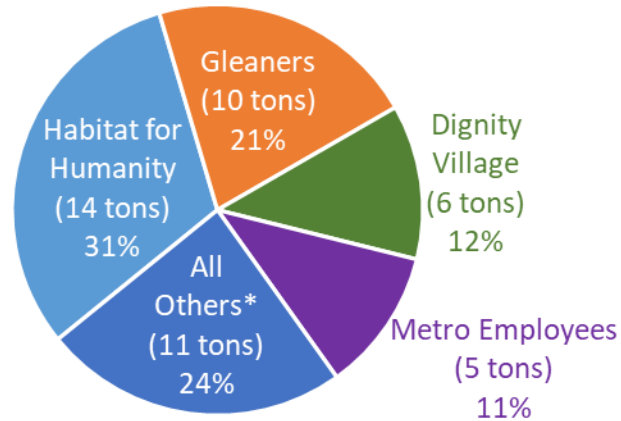
Employee reuse violated Metro Code 2.17.040 and the Employee Ethics policy. The SOP also increased the chance that a Metro employee could violate Oregon Revised Statute 244.040. All three prohibit public officials from using their position for financial gain or to avoid financial costs.

The 2015 SOP allowed employees to take certain materials for personal use under some conditions. It contained a list of acceptable reuse materials like household cleaners, fertilizer, and building materials. It also prohibited reuse of some materials like ammunition. To reuse materials, employees were required to weigh it, get approval, and sign a liability waiver annually. The SOP did not require employees to document what materials were taken.

Electronic waste was not listed in the SOP. The WPES Department Director and other employees made it clear that electronic waste was not intended to be included in the program. During the Human Resources investigation, the employee's supervisor stated that the SOP was followed. However, during the audit, they stated that electronic waste was not part of the reuse program.

Most reused materials were given to non-profit organizations. Employee reuse accounted for about 11% of the program from January 2025 through June 2025. In the past, some reuse material was distributed at community events. The most recent appears to have been in spring 2022.

**Exhibit 1 Employees took about 11% of all reused materials from January through June 2025.**



*Source: Auditor's Office analysis of employee reuse logs at the Household Hazardous Waste facilities at Metro Central and South Transfer Stations.*

*\*Includes contractor employees; Helping Hands, Growing Gardens; St. John's Food Share; Scrap; Gleaner artists; Virginia Johnson Training Stables; NW Biofuel; and seven individuals.*

**Garbage and recycling managers did not set employees up for success**

To align the employee reuse procedures with Metro Code and policy, any employee reuse materials would need to be:

- Offered to the public first under the same terms and conditions as employees, or
- Made an employment benefit by Metro Council.

Metro's transfer stations and household hazardous waste facilities cannot safely provide reuse material directly to the public or Metro employees who do not work at those locations. Metro's benefits handbook and collective bargaining agreements do not list reuse material as an employee benefit.

Employee salvaging and reuse of items left at the transfer stations has been part of the culture of both transfer stations for many years. However, management has not taken action to address it despite several examples of the practices causing problems. For example, in the past employees were allowed to purchase items for \$1. That practice was discontinued when someone left a trailer full of materials on the side of the highway and the original owner of the material was contacted to clean it up.

More recently, an employee noted that reuse sometimes caused tension because it impacted operations. Employees were spending time managing reuse material instead of completing other job duties. This could impact employee and public safety when managing household hazardous waste.

Safety concerns are why Metro's transfer contractors prohibit salvaging. Trying to pull items out of dumped loads risks employee health. It can also

incentivize personal benefits rather than operational needs and workplace safety.

A 2021 investigation confirmed that an employee took an item for personal use from the transfer station. That investigation found employees were aware they were not supposed to take items, but management was not willing to take corrective action without a specific No Salvaging policy. It's not clear why Metro Code and the Employee Ethics policy were ignored.

At the time of the 2021 investigation, a draft No Salvaging policy had been created. It said salvaging was theft of time and public resources. It is not clear if the policy was implemented, but it was not in place as of August 2025.

The SOP has been under review since at least 2019, but no changes have been made. In 2022, the former Garbage and Recycling Operating Director interviewed employees about reuse practices. That process appears to have been intended to expand the types of materials included in the reuse program.

The interviews were summarized in a July 2023 report. The report stated personal use of reuse materials was a benefit for scale house, HHW, and traffic employees. It was not clear what that conclusion was based on. It is not aligned with Metro Code, policy, or the employment benefits approved by Council.

The practices summarized in the report gave some Metro employees preferential access to reuse materials. To align with ethical requirements, program partners and the public would need to have access to reuse materials under the same terms and conditions as employees.

It is not clear why managers did not change practices in response to the program overview report. Managers in the Garbage and Recycling Operations division of WPES stated that the SOP was under review during the hotline investigation and audit.

The former Garbage and Recycling Operations Director, Transfer Station Superintendents, HHW Supervisors, and other WPES personnel were all aware of employee reuse at the HHW facilities and salvaging at the transfer stations. Despite this knowledge they did not enforce existing policies. They did not finalize revisions to the SOP in 2019, 2022, 2023, or 2025. They also did not implement the No Salvaging policy in 2021 or 2025.

All Metro employees were required to complete training in FY 2024-25. A 30-minute course on Oregon ethics law was one of the requirements. South HHW employees completed all required training. Some Central HHW employees did not complete some required training. The training summarized restrictions on obtaining personal benefits and gifts, but it did



## The Reuse Standard Operating Procedure was not followed

not include information about Metro's Code of Ethics and Employee Ethics policy.

Focusing on Oregon law in the training may have reduced understanding of management's responsibility related to ethics. Metro's policy states that managers are responsible for ensuring compliance with the Employee Ethics policy. The ethics training focused on personal responsibility for complying with the law and indicated that managers did not have a role other than their own conduct.

In addition to not being aligned with ethical requirements, the SOP was not followed. To reuse materials, employees were required to weigh it, get approval, and sign a liability waiver annually. The laptop and other electronic waste were not approved materials for reuse.

Reuse logs in the first six months of 2025 also showed:

- Some items were taken without any documented approval.
- Some items were approved by the same employee who took them.
- Some managers had subordinates approve the items they took.
- Employee liability waivers were more than a year old.
- Some program partners did not sign their waivers.

These discrepancies showed that several layers of management in WPES did not provide effective oversight. HHW employees report to two program supervisors at each facility, so there were four HHW supervisors total. The supervisors reported to the transfer station superintendents at Central and South. The two superintendents reported to a Garbage and Recycling Operations Director, who reported to the WPES Director.

Employee reuse logs were used to document the SOP was followed. The logs were managed by the four HHW Program Supervisors. At South, several of the reuse items logged each month were missing approval signatures. At Central, only a few signatures were missing but items were sometimes approved by the same individual that took them. This was functionally the same as not being approved.

Some items were taken by Supervisors. Some of the material taken by supervisors was approved by employees who reported to them. Employee approval of their manager's compliance with the SOP was not an effective control. In other cases, supervisors approved their own reuse directly.

In addition, all employee reuse waivers were more than a year old. The SOP required waivers to be updated annually. Lack of updates could increase legal liability for Metro. Program partners submitted a waiver each month with the weight of materials they received, but the waiver was not signed by some recipients. It was also unclear how up to date the liability waiver was. It appeared to have been used since at least 2003. Changes in law or insurance standards since they could impact the liability protection provided by the form.

## Exhibit 2 Reuse procedures were not followed consistently.

Reuse SOP Requirement	Partially Followed	Not Followed
Approval signature	X	
Authorized approver	X	
Employee liability waiver	X	
Employee liability waiver updated annually		X
Organization liability waiver	X	

*Source: Auditor's Office analysis of Metro Central and South reuse logs and waivers from January 2025 through June 2025 in comparison to the 2015 Reuse Standard Operating Procedure requirements.*

The monthly reuse logs were sent to the Transfer Station Superintendents. This provided another opportunity to correct practices that were not aligned with the SOP. The superintendents stated that they reviewed the logs to fulfill requirements for reporting on the amount of outbound material. It was not clear why they did not address deviations from the SOP.

**Effective management  
will be critical for  
Metro's efforts to  
increase reuse**

Besides ethical and compliance risks, stronger oversight of the reuse program was needed to ensure Metro's services were transparent to the public. For example, Metro's services for electronic waste state that it will be recycled, not reused. As such, customers should rightly be concerned if material they drop off is not recycled. Similarly, if hazardous materials are reused, a customer may feel misled if it is given to someone who may not dispose of it properly.

Metro's Garbage and Recycling Facilities Plan and Regional Waste Plan both indicate a desire to increase reuse. Those efforts could decrease the amount of material sent to landfills and other processing facilities. However, expanding reuse before facilities, policies, and procedures are adequately set up could undermine public trust and employee safety.

Employees interviewed for the 2023 reuse program overview report indicated they were considering ways to expand reuse without addressing ethical and waste management standards. One example was a proposal to not call the material dropped at HHW facilities "waste" because when it becomes waste environmental regulations came into force.

Refocusing waste management toward greater reuse requires environmental, financial, and legal standards to ensure it can be sustained. Effective management at Metro will be critical to setting the region up for long-term success. That will take more work and a willingness to change past practices. Change may not be popular with employees, but it can provide more transparent services to the public.

## Investigation report omitted concerns about non-compliance with the SOP and ethics requirements

The investigation report omitted the Office of Metro Attorney's (OMA) conclusion that the incident likely violated the SOP and ethics requirements. HR shared OMA's ethical concerns about employee reuse practices with the WPES Director; HR Director; interim Garbage and Recycling Operations Director; Employee Relations Manager; and Workplace Investigator. However, the investigation report did not mention or address them.

The omission showed a willingness to prioritize past practices over existing policies and Metro Code requirements. When management does not take prompt action it increases risks for Metro and its employees. It also risks damaging public trust in Metro's solid waste services.

Employee reuse was well documented, and practices were summarized in the 2023 overview report, which was included in the investigation. OMA concluded that the incident did not appear to follow the SOP and probably did not meet ethical requirements on 7/3/2025. Despite this, they stated that the investigation report did not need to be revised to include that information. The investigation report was sent to the Metro Auditor on 7/7/2025. It concluded that no policy violations occurred.

Employee reuse was only paused after the audit entrance conference and a subsequent email from the Metro Auditor. It came 51 days after management learned of the investigation, 21 days after they learned of ethical concerns from OMA, and 14 days after the audit start letter which mentioned ethical concerns.

### Exhibit 3 The investigation report omitted concerns about non-compliance with the SOP and ethics requirements.

Hotline	HR Investigation	Audit
<ul style="list-style-type: none"> <li>Report received 5/27/25</li> </ul>	<ul style="list-style-type: none"> <li>WPES management notified of investigation 6/2/25</li> <li>HR summarized the investigation to management and noted OMA's ethics concerns 7/2/25</li> <li>OMA concluded that the SOP did not appear to be followed, and the incident probably violated ethics requirements 7/3/25</li> <li>Investigation report concluded that no policy violations occurred 7/7/25</li> </ul>	<ul style="list-style-type: none"> <li>Start letter sent 7/9/25</li> <li>Entrance meeting with management 7/23/25</li> <li>WPES paused employee reuse 7/23/25</li> </ul>

*Source: Auditor's Office summary of hotline investigation and audit documentation.*

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## Recommendations

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To strengthen controls for the Reuse Program, the Waste Prevention and Environmental Services Director should:

1. Remove employee reuse from the Standard Operating Procedure (SOP).
2. Update the SOP to require documentation of reused material types, not just weights.
3. Document oversight requirements for the SOP and Reuse Program.
4. Assign oversight responsibilities to:
  - a. the Transfer Station Superintendents at Metro Central and South to ensure the SOP is followed.
  - b. the Garbage and Recycling Operations Director to ensure the Reuse Program is managed consistently at Metro Central and South.

To improve compliance with the ethics requirements, Metro Code and policies, the Chief Operating Officer (COO) should:

5. Ensure managers have procedures in place to prevent, detect and correct ethics violations within their chain of command.
6. Strengthen controls to create and maintain an ethical culture by ensuring training is completed annually by all employees and that it includes Metro policies not just legal requirements.

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## Scope and methodology

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The purpose of the audit was to determine what controls were in place to ensure employee reuse procedures followed ethical requirements and customer expectations for electronic waste. There were two objectives:

1. Determine how the Reuse program was managed at Metro Central and Metro South as it relates to ORS 244.040, Metro Code 2.17.040, and Metro's Ethics policy.
2. Determine what services Metro South and Central provide for electronic waste.

To meet the objectives, we reviewed the Human Resource investigations for Accountability Hotline cases 377 and 495. For case 495, we also reviewed the investigation's supporting documents and timelines. We reviewed Oregon ethics law, Metro Code, and Metro policies. We analyzed program materials, reuse logs and waivers, and efforts to update the program. We also gathered information about current reuse practices and electronic waste protocols from managers in the Garbage and Recycling Operations division of WPES.

The audit was added to the FY 2025-26 audit schedule. We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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# Management response

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## Memo



Date: September 26, 2025

To: Brian Evans, Metro Auditor

From: Marissa Madrigal, Chief Operating Officer  
Marta McGuire, Director of Waste Prevention and Environmental Services

Subject: Management Response to Limited Scope Audit on WPES Reuse Program

Thank you for the opportunity to respond to the limited scope audit regarding the Reuse Program at Metro's Household Hazardous Waste (HHW) facilities. We appreciate your attention to this issue and the recommendations provided to strengthen program oversight and ethical compliance.

Metro leadership takes seriously its responsibility to uphold public trust and ensure that our programs operate in alignment with applicable laws, policies, and ethical standards. Metro has long supported waste prevention and reuse through its HHW Reuse Program. However, we recognize that the employee reuse component of the program raises concerns that warrant immediate and thorough review.

### **Importance of Reuse**

Oregon law establishes reuse as a core element of solid waste management. Specifically, ORS 459.015 establishes a waste management hierarchy that prioritizes waste prevention and reuse over disposal, while the Opportunity to Recycle Act (ORS 459A) requires local governments to implement programs that promote waste prevention and reuse. The HHW Reuse Program dates back more than 25 years and reflects early efforts to build reuse into daily operations of public facilities.

In those 25 years, Metro has donated materials collected at hazardous waste facilities to non-profits and other community members. These materials include paint thinners, camping stove fuel, car wash soap, and other DEQ-approved substances brought to Metro's HHW facilities by the public. More than 90 percent of material re-used from Metro HHW facilities has gone to such organizations, while a small portion has also been claimed by Metro employees. The goal of the program is to limit the financial and environmental costs to the public of disposing these hazardous substances. In FY 24-25, the community was able to reuse almost 232,000 pounds of HHW material, saving the region approximately \$460,000 – a figure which does not take into account the health risk reduction, avoided pollution, ecosystem impacts, and reduced greenhouse gas emissions from making new products.

## **Hotline Investigation**

It is within this context of a decades-long, successful reuse program that HR conducted its investigation into the hotline complaint, and management at both WPES and the COO's office considered the initial findings. We recognize the audit's concern that the investigative report concluded that no policy violations had occurred and did not mention or address the violations of the reuse program's standard operating procedures (SOPs) or potential ethics concerns. During the investigation, the SOPs were interpreted by HR and the employee's manager as permitting the reuse activity, and HR did not undertake a larger review of the SOPs at that time.

Between July 7, when the Auditor notified the COO of the hotline complaint, and the July 23 audit entrance meeting, Management worked with the Office of the Metro Attorney, HR and WPES leadership to fact-find and build a shared understanding of the reuse program history and the existing practices of this long-running program. A number of facts from the HR investigation were incongruent with leadership's understanding of Metro's salvaging and reuse practices. It is because of that work that Management agrees with the Auditor's recommendations.

It is clear that the reuse of e-waste is not part of the HHW program and should not have been allowed, and the potential ethics violations should have been included as part of the initial investigation. HR is revamping its investigatory process to ensure that State Ethics Law, Metro Ethics Code and Metro ethics policies are considered in future cases.

## **Actions Taken**

Following the audit entrance meeting on July 23, the employee reuse program was paused and a broader review of the reuse program was initiated to determine whether the SOPs have been consistently followed, whether managers upheld their managerial and ethical duty to maintain fidelity to Metro's procedures and whether the program creates the risk of ethical violations for our employees. That review is ongoing, but as noted in the recommendations below we have agreed to remove employee reuse from the program and update the SOPs for community reuse.

In addition, WPES has strengthened its guidance around material disposal at the transfer stations. Any e-waste that is dropped off at HHW should be sent to the transfer station and disposed of according to established procedures for e-waste, and not considered HHW eligible for reuse. As noted below, WPES will begin documenting reused material types that are provided to the public, non-profits, and other community members instead of just weights.

We believe the documented timeline shows continuous and deliberate engagement during the month of July as it relates to the specific hotline complaint and the need to review the larger program. Once the entire scope of your concerns was shared on July 23, management took immediate action.

We agree with the audit's recommendations and are committed to implementing the necessary changes to strengthen program controls, clarify roles and responsibilities, and ensure that Metro's ethical standards are consistently upheld. We look forward to working with you in the future on ways to ensure that any urgent information or concerns that you have about Metro programs can be shared and addressed in as timely a manner as possible.

**Recommendation 1:** *To strengthen controls for the Reuse Program, the WPES Director should remove employee reuse from the SOP.*

Management agrees with this recommendation. The employee reuse program was paused in late July. In light of the audit findings and the space limitations at current facilities that present challenges for safe public access, management will update the SOP to formally remove employee reuse. While discontinuation is appropriate at this time, management believes the concept should be retained for consideration in the planning and design of future facilities in order to maximize the amount of reuse of HHW materials, which has positive environmental and fiscal benefits. This action will be completed by October 2025.

**Recommendation 2:** *To strengthen controls for the Reuse Program, the WPES Director should update the SOP to require documentation of reused material types, not just weights.*

Management agrees with this recommendation. WPES will update the SOP to require documentation of reused material types. This will include adding a section to the SOP that will clearly outline material type and weight in addition to the development of annual reports to document material recovery. This will be completed by November 2025.

**Recommendation 3:** *To strengthen controls for the Reuse Program, the WPES Director should document oversight requirements for the SOP and Reuse Program.*

Management agrees with this recommendation. WPES is in the process of documenting the oversight requirements for the SOP and Reuse Program that will include written procedures that map directly to policy and program requirements. This documentation will clearly outline roles and responsibilities including oversight of SOP documentation, ongoing training, monitoring policy compliance, and data collection. WPES will also be outlining a process for ongoing program audits that include review of program records and sign offs to ensure policy compliance. This approach will provide a clear audit trail, strengthen accountability and allow for management to detect gaps early to determine any needs for corrective action. This will be completed by November 2025.

**Recommendation 4:** *Assign oversight responsibilities to the Transfer Station Superintendents at Metro Central and South to ensure the SOP is followed and assign oversight responsibilities to the Garbage and Recycling Operations Director to ensure the Reuse Program is managed consistently at Metro Central and South.*

Management agrees with this recommendation. The WPES director will assign responsibilities in accordance with the updated SOP and Reuse program oversight



requirements to the appropriate staff. This will include written documentation to outline oversight responsibilities including policy compliance, implementation monitoring, reporting, risk escalation and corrective action. Program audits will be utilized to help inform program consistency across operations and provide opportunities for continuous improvement. This will be completed by November 2025.

**Recommendation 5:** *To improve compliance with the ethics requirements in Metro Code and policies, the COO should ensure managers have procedures in place to prevent, detect and correct ethics violations within their chain of command.*

Management agrees with this recommendation. Metro's Code and Employee Ethics Policy clearly establish expectations for ethical conduct, and we recognize the importance of ensuring that managers are equipped to uphold these standards. Metro employees, including managers and supervisors, are required to take an ethics training every year. We will work with Human Resources to develop a supplemental training and/or materials that will support managers in identifying and addressing potential ethics violations. We are committed to ensuring that ethical compliance is a core component of supervisory responsibilities. This work will be completed by June 2026.

**Recommendation 6:** *To improve compliance with the ethics requirements in Metro Code and policies, the COO should strengthen controls to create and maintain an ethical culture by ensuring training is completed annually by all employees.*

Management agrees with this recommendation. As noted above, we already require employees to take annual ethics training. In FY 2024-25, 92% of Metro employees and 87% of WPES employees completed the training. We acknowledge that the current training focuses on legal requirements for public employees under state law and does not necessarily include a discussion of Metro's internal policies and expectations. We believe that a consistent and comprehensive approach to ethics training is essential to maintaining public trust and supporting a strong culture of ethics and accountability, and we will look at potential revisions to the training. This action will be completed by January 2026.



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