

APPENDIX
CONFLICT OF INTEREST CODE
OF THE
TRI-CITY HEALTHCARE DISTRICT

(Proposed March 2018)

EXHIBIT "A"

OFFICIALS WHO MANAGE PUBLIC INVESTMENTS

District Officials who manage public investments, as defined by California Code of Regulations, title 2, section 18700.3, subdivision (b), are not subject to the District's Code, but are subject to the disclosure requirements of the Act. (Gov. Code § 87200 *et seq.*) These positions are listed here for informational purposes only, and are required to file a statement of economic interest with the Executive Secretary to the Board of the District. Upon receipt of Statements of Economic Interests from Members of the Board of Directors and the President/Chief Executive Officer, the Executive Secretary shall make and retain a copy and forward the original to the County of San Diego Clerk of the Board of Supervisors.

It has been determined that the positions listed below are officials who manage public investments¹:

Members of the Board of Directors

President/Chief Executive Officer

DESIGNATED POSITIONS

GOVERNED BY THE CONFLICT OF INTEREST CODE

Designated employees listed below, and the Chief Financial Officer¹ shall file Statements of Economic Interests with the Executive Secretary who will retain the originals and make the statements available for public inspection and copying.

DESIGNATED EMPLOYEES'
TITLE OR FUNCTION

DISCLOSURE
CATEGORIES ASSIGNED

Chief Compliance Officer

All

Chief Government & External Affairs Officer

All

¹ Individuals holding one of the above-listed positions may contact the FPPC for assistance or written advice regarding their filing obligations if they believe that their position has been categorized incorrectly. The FPPC makes the final determination whether a position is covered by Government Code section 87200.



Chief Development Officer	All
Director of Facilities	5
Director of Finance	1,2
Senior Vice President of Information Technology	1,5
Director of Materials Management	5
Executive Vice President and Chief Operating Officer	All
Facilities Manager	6
General Counsel	All
Board Counsel	All
Associate Counsel	All
Purchasing Manager	5
Purchasing Clerk	5
Senior Director of Business Development	1,2,5
Director of Human Resources	6
Chief Nurse Executive/ Senior Vice President	5
Director of Total Rewards and HRIS	5
Senior Director of Nursing	5,6
Directors and Senior Directors (ALL others not specified)	6

² Consultants

² Consultants shall be included in the list of Designated Employees and shall disclose pursuant to the broadest disclosure category in this Code subject to the following limitation:

The Chief Executive Officer may determine in writing that a particular consultant, although a “designated position,” is hired to perform a range of duties that are limited in scope and thus is not required to fully comply with the disclosure requirements described in this Section. Such written determination shall include a description of the consultant’s duties and, based upon that description, a statement of the extent of disclosure requirements. The Chief Executive Officer’s determination is a public record and shall be retained for public inspection in the same manner and location as this Conflict of Interest Code.

EXHIBIT "B"

DISCLOSURE CATEGORIES

The disclosure categories listed below identify the types of investments, business entities, sources of income, including gifts, loans and travel payments, or real property which the Designated Employee must disclose for each disclosure category to which he or she is assigned.

Category 1: All investments and business positions in business entities, and sources of income that are located in, do business in or own real property within the jurisdiction of the District.

Category 2: All interests in real property which is located in whole or in part within, or not more than two (2) miles outside, the jurisdiction of the District.

Category 3: All investments and business positions in, and sources of income from, business entities that are engaged in land development, construction or the acquisition or sale of real property within the jurisdiction of the District.

Category 4: All investments and business positions in, and sources of income from, business entities that are banking, savings and loan, or other financial institutions.

Category 5: All investments and business positions in, and sources of income from, business entities that provide services, supplies, materials, machinery, vehicles or equipment of a type purchased or leased by the District.

Category 6: All investments and business positions in, and sources of income from, business entities that provide services, supplies, materials, machinery, vehicles or equipment of a type purchased or leased by the Designated Employee's Department.

Category 7: All financial interests in investment advisors and managers; financial services providers, actuaries, and those providing fiduciary services (including record-keeping) to retirement plans.

**NOTICE OF INTENTION TO AMEND THE CONFLICT OF INTEREST CODE
FOR TRI-CITY HEALTHCARE DISTRICT**

NOTICE IS HEREBY GIVEN that Tri-City Healthcare District (the “District”) has tentatively approved and intends to finally adopt an amended Conflict of Interest Code (“Code”) pursuant to Government Code section 87306 at its meeting on May 31, 2018. The purpose of these amendments is to implement the requirements of Government Code sections 87300 through 87302 and 87306.

The Code designates those employees, members, officers, and consultants who make or participate in making governmental decisions and must file disclosure statements. The District proposes to amend its Code to designate a place of filing.

A public comment period has been established commencing on March 30, 2018, and terminating on May 14, 2018 (a 45-day period). Any interested person may present written comments concerning the proposed amendments. Written comments to the Code must be submitted no later than 1:30 p.m. on May 14, 2018 to the District’s representative at the address listed below to be considered by the District before it adopts the amended Code. No public hearing on this matter will be held unless any interested person or his or her representative requests a public hearing no later than April 29, 2018, fifteen (15) days prior to the close of the written comment period.

The District has prepared a written explanation of the reasons for the proposed amendments. The exact terms of the proposed amendments to the Code, and all of the information upon which the amendments are based, are available for inspection and copying by interested persons by contacting the District’s representative listed below. Any general inquiries concerning the proposed amendments to the Code should be directed to the District’s representative.

District’s Representative: Teri L. Donnellan, Executive Assistant
Tri-City Medical Center
4002 Vista Way
Oceanside, CA 92056
(760) 940-3348