



PALOMAR HEALTH
SPECIALIZING IN YOU

Conflict of Interest Code

21800

Policy

Official (Rev: 6)

Source:
Administrative
Board of Directors

Applies to Facilities:
All Palomar Health Facilities

Applies to Departments:
All Departments

TWELFTH AMENDED AND RESTATED CONFLICT OF INTEREST CODE OF PALOMAR HEALTH

I. PURPOSE:

The Political Reform Act (California Government Code, Sections 81000 et seq.) requires state and local government agencies to adopt and promulgate conflict of interest codes. Pursuant to the Political Reform Act of 1974 (California Government Code, Sections 81000 et seq.) and regulations of the Fair Political Practices Commission (California Code of Regulations, Title 2, Sections 18100, et seq.). Palomar Health hereby adopts the following Conflict of Interest Code.

II. DEFINITIONS:

The definitions contained in the Political Reform Act of 1974, regulations of the Fair Political Practices Commission, and any amendments to the Act or regulations, are incorporated by reference into this conflict of interest code.

III. STANDARDS OF PRACTICE:

A. INCORPORATION OF FPPC REGULATION §18730:

The Political Reform Act, requires state and local government agencies to adopt and promulgate Conflict of Interest Codes. The Fair Political Practices Commission has adopted a regulation, California Code of Regulations, Title 2, Section 18730, which contains the terms of a standard Conflict of Interest Code, which can be incorporated by reference in an agency's code. After public notice and hearing, the standard code may be amended by the Fair Political Practices Commission to conform to amendments in the Political Reform Act. Therefore, the terms of California Code of Regulations, Title 2, Section 18730 and any amendments to it duly adopted by the Fair Political Practices Commission are hereby incorporated by reference. This regulation and the attached Appendix, designating positions and establishing disclosure categories, shall constitute the Conflict of Interest Code of Palomar Health.

B. STATEMENTS OF ECONOMIC INTERESTS: PLACE OF FILING:

Individuals in designated positions shall file their statements of economic interests (Form 700) with the Palomar Health Chief Executive Officer or designee. The Palomar Health Chief Executive Officer or designee shall make and retain a copy and forward the original to the San Diego County Board of Supervisors. The Palomar Health Chief Executive Officer or designee will make the statements available for public inspection and reproduction. (California Government Code, Section 81008).

IV. ADDENDIX:

OFFICIALS WHO MANAGE PUBLIC INVESTMENTS

Palomar Health Officials who manage public investments, as defined by California Code of Regulations, Title 2, section 18701, subdivision (b), are not subject to Palomar Health's Conflict of Interest 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.

It has been determined that the positions listed below are officials who manage public investments[1]:

Approved and/or authorized by the
Board of Supervisors of the County of San Diego.
Meeting Date: 12/13/2016 Minute Order No. 15
By: *[Signature]* Date: 12/14/2016
Deputy Clerk of the Board Supervisors

- Members of the Board of Directors
- Chief Executive Officer
- Executive Vice President of Finance

DESIGNATED EMPLOYEE POSITIONS

The persons holding positions listed below are designated employees. It has been determined that these persons make or participate in the making of decisions which may foreseeably have a material effect on economic interests.

<u>Designated Employee Position Title</u>	<u>Assigned Disclosure Category</u>
1. General Counsel.....	All
2. Compliance Officer.....	All
3. Audit Officer.....	All
4. Executive Vice President of Strategy.....	All
5. Executive Vice President of Physician Alignment.....	5
6. Executive Vice President of Operations.....	All
7. Executive Vice President of Human Resources.....	6
8. Vice President of Patient Experience.....	1, 5
9. Vice President of Palomar Medical Center.....	All
10. Vice President of Palomar Health Downtown Campus and Pomerado Hospital.....	All
11. Vice President of Continuum Care.....	1, 2, 5
12. Vice President of Information Systems.....	5
13. Vice President of Revenue Cycle.....	1, 2
14. Assistant Vice President of Hospitality & Facilities.....	5
15. Assistant Vice President of Clinical & Diagnostic Services.....	5
16. Chief Nursing Officer of Palomar Health Downtown Campus and Pomerado Hospital.....	5, 6
17. Chief Nursing Officer of Palomar Medical Center.....	5, 6
18. Director, Corporate Supply Chain Services.....	5
19. Consultant[2]	

DISCLOSURE CATEGORIES

The disclosure categories set forth below specify which kinds of economic interests are reportable. Such a designated employee shall disclose in his or her statement of economic interests those economic interests he or she has which are of the kind described in the disclosure categories to which he or she is assigned. It has been determined that the economic interests set forth in a designated employee's disclosure categories are the kinds economic interests which he or she foreseeably can affect materially through the conduct of his or her office.

Category 1.

All investments and business positions in business entities, and sources of income, including gifts, loans, and travel payments that are located in, do business in or own real property within the jurisdiction of Palomar Health.

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 Palomar Health.

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 Palomar Health.

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 Palomar Health.

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 recordkeeping) to retirement plans.

[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.

[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 Chairperson of the Board 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 Chairperson'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. Nothing herein excuses any such consultant from any other provision of this Conflict of interest Code.

I. PUBLICATION HISTORY:

Revision Number	Effective Date	Document Owner at Publication	Version Notes
6 (this version)	06/11/2016	Deborah Barnes, Dir Regulatory Coordination	Incorporate BoD approved revisions Jan, 2016
5 (Changes)	07/28/2015	Mark Neu, Corporate Compliance Officer	Complete review and update to include current leadership structure, as approved at the 6/8/15 Palomar Health Board meeting.
4 (Changes)	06/28/2013	Janine Sarti, General Counsel	Palomar Health is referred to as PPH or Palomar Pomerado Health. Updating the policy to read Palomar Health

3 (Changes)	03/02/2011	Martha (Marty) Knutson, Corporate Compliance Officer	Incorporate FPPC regulation contents by reference; add designated employees. County of San Diego approved this version of the Conflict of Interest Code on October 19, 2010.
2 (Changes)	08/27/2008	Janine Sarti, General Counsel	Change in the law
1 (Changes)	02/02/2007	James Neal, Director of Corporate Integrity	No revision notes for this document. ECP

Authorized Signer(s):

(05/31/2016
09:37AM PST)
Bob Hemker,
President & CEO
(06/11/2016
01:44PM PST)
Dara Czerwonka,
Chairman, Board
of Directors

Reviewers**I. REFERENCES:****Reference Type****Title****Notes**

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<https://www.lucidoc.com/cgi/doc-gw.pl?ref=pphealth:21800>.