

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

(Proposed September 2013)

EXHIBIT "A"

OFFICIALS WHO MANAGE PUBLIC INVESTMENTS

District Officials who manage public investments, as defined by California Code of Regulations, title 2, section 18701, 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.

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

Chief Financial Officer

DESIGNATED POSITIONS

GOVERNED BY THE CONFLICT OF INTEREST CODE

<u>DESIGNATED EMPLOYEES'</u> <u>TITLE OR FUNCTION</u>	<u>DISCLOSURE</u> <u>CATEGORIES ASSIGNED</u>
Vice President Legal Affairs	All
Compliance Officer	All
Director of Facilities	5
Senior Director of Finance and Controller	1, 2
Director Financial Planning and Analysis	1,2

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.

Approved and/or authorized by the Board of Supervisors of the County of San Diego.	
Meeting Date: 3/11/14	Minute Order No. 18
By: <i>[Signature]</i>	Date: 3/14/14
Deputy Clerk of the Board Supervisors	

Director of Materials Management	5
Executive Vice President and Chief Operating Officer	All
Facilities Manager	6
General Legal Counsel	All
Materials Manager	5
Vice President Strategic Services and Business Integration	All
Director of Business Development	1,2,5
Director of Business Development – Multicultural	1,2,6
Director of Business – OB	1,2,5
Chief Development Officer	All
Vice President and Chief Human Resources Officer	6
Chief Clinical Officer and Chief Nurse Executive	5
Vice President, Quality and Service Improvement	1,5
Director of Total Rewards and HRIS	5
Senior Director of Community Relations and Events	1,2
Senior Director Nursing	5,6
Senior Director Support Services	5
Directors and Senior Directors (ALL others not specified)	6
Employee Fiduciary Retirement Plan Subcommittee Members	7

Consultant²

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.