

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

(September 2022)

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.

<u>DESIGNATED EMPLOYEES'</u> <u>TITLE OR FUNCTION</u>	<u>DISCLOSURE</u> <u>CATEGORIES ASSIGNED</u>
Chief Compliance Officer	All
Chief Government & External Affairs Officer	All
Director of Facilities	5

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: 11/15/22 Minute Order No. 23
By:  Date: 11/15/22
Deputy Clerk of the Board Supervisors

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
Purchasing Manager	5
Purchasing Clerk	5
Senior Director of Business Development	1, 2, 5
Vice President of Human Resources	6
Chief Nurse Executive	5
Chief Medical Officer	5
Chief of Patient Care Services	5
Director of Total Rewards and HRIS	5
Senior Director of Nursing	5, 6
Directors and Senior Directors (ALL others not specified)	6
President of Foundation	All
Consultant ²	

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.