

 <p style="text-align: center;">County of Sacramento Department of Health Services Division of Primary Health Services Policy and Procedure</p>	Policy Issuer (Unit/Program)	Clinic Services
	Policy Number	01-03
	Effective Date	01-31-13
	Revision Date	DRAFT REVISION 04-05-18
Title: Sacramento County Health Center Co-Applicant Board – Conflict of Interest		Functional Area: Organization
Approved By: Sandy Damiano, Interim Project Director		

Policy:

Sacramento County Clinic Services adheres to the Health Services and Resource Administration (HRSA) requirement to maintain written standards of conduct covering conflict of interest. Conflicts of interest involving the Sacramento County Health Center Co-Applicant Board must be identified and disclosed when the Co-Applicant Board member is considering entering into a transaction, arrangement, policy, financial, or other work that might benefit the private interest of the Board member. This policy is intended to supplement but not replace any applicable state and federal laws governing conflict of interest that are applicable to nonprofit and charitable organizations.

Definitions:

- A. Conflict of Interest** - An actual or perceived interest by a Board member in an action which results, or has the appearance of resulting, in personal, organizational, or professional gain.
- B. Financial Interest** - A Co-Applicant Board member has a financial interest if s/he, directly or indirectly through business, investment, or family has:
 - 1. An ownership or investment interest in any entity with which the Co-Applicant Board has a transaction or arrangement.
 - 2. A compensation arrangement with any entity or individual with which the Co-Applicant Board has a transaction or arrangement. Compensation includes direct and indirect remuneration as well as gifts or favors that are not insubstantial, such as consultancy, fee-paid work, and shareholdings.

Procedures:

- A. Form 700 - Statement of Economic Interests**
 - 1. Co-Applicant Board members are required to fully disclose their personal assets and income.
 - 2. Co-Applicant Board members complete and file Form 700 with the Clerk of the Board of Supervisors:
 - a. within 30 days of position appointment
 - b. annually during appointment by the date specified in the California Fair Political Practices Commission
 - c. no later than 30 days after leaving the appointed position
- B. Ethics Training**
 - 1. Co-Applicant Board members are required to take the provided Ethics Training course to educate them on the ethical standard:
 - a. within 30 days of position appointment

- b. once every two years during appointment
2. The Ethics Training course is provided either in person or on-line.

C. Disclosure and Attestation Statement

1. Co-Applicant Board Bylaws require Board members to declare any potential conflicts of interest by completing a Conflict of Interest: Disclosure and Attestation Statement.
2. New members complete the Disclosure and Attestation Statement upon appointment to membership with the Co-Applicant Board.

D. Program Planner Responsibilities

1. Reviews and discusses this policy on an annual basis during a Co-Applicant Board meeting.
2. Provides a Disclosure and Attestation Statement to new Co-Applicant Board members for completion.
3. Ensures timely submission and completion of Form 700 - Statement of Economic Interests and Ethics Training.

E. Board Member Responsibilities

1. Discloses any conflict of interest and all material facts to the Co-Applicant Board when there is a proposed transaction or arrangement.
2. Abstains from voting in a situation where a conflict of interest exists for that member.
3. Is not an employee of the County Health Center or the County of Sacramento, Department of Health Services.

References:

HRSA Health Center Program Compliance Manual. Chapter 13: Conflict of Interest
California Fair Political Practices Commission
Sacramento County eDisclosure
Co-Applicant Board Bylaws

Attachments:

Disclosure and Attestation Statement
California Form 700, Statement of Economic Interests

Contact:

Kari Lockwood, LMFT, Program Planner

Co-Applicant Board Approval Date: