

**CONFLICT OF INTEREST CODE  
OF THE  
SALINAS VALLEY MEMORIAL HEALTHCARE SYSTEM**

The Political Reform Act of 1974 (Government Code sections 81000, et seq.) requires state and local government agencies to adopt and promulgate conflict of interest codes. The Fair Political Practices Commission has adopted a regulation, section 18730 of Title 2 of the California Code of Regulations, 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 Fair Political Practices Commission may amend the standard code to conform to amendments of the Political Reform Act. Therefore, the terms of section 18730 of title 2 of the California Code of Regulations and any amendments to it duly adopted by the Fair Political Practices Commission are hereby incorporated by reference. This regulation and the attached Appendices, designating positions and establishing disclosure categories, shall constitute the Conflict of Interest Code of the Salinas Valley Memorial Healthcare System (hereafter "Agency").

Individuals holding designated positions shall file their statement of economic interests with the Salinas Valley Memorial Healthcare System, which will make the statements available for public inspection and reproduction pursuant to Government Code section 81008. Upon receipt of the statements for Members of the Board of Directors and President / Chief Executive Officer, the Agency shall make and retain copies, and forward the original statements to the Office of the Clerk of the Board of Supervisors of Monterey County. Statements for all other designated positions shall be retained by the Agency.

Attachments: Appendix A: Designated Positions  
Appendix B: Disclosure Categories

Adopted as Amended and Restated: ~~August 23, 2012~~ November 20, 2014  
By Resolution ~~2014-042-08~~

**CONFLICT OF INTEREST CODE OF THE  
SALINAS VALLEY MEMORIAL HEALTHCARE SYSTEM  
APPENDIX A: DESIGNATED POSITIONS**

Designated Positions<sup>1</sup>

Assigned Disclosure Category

Administrative Dir Nutrition & Environmental Svcs		2		
<del>Administrative Dir Rehabilitation &amp; Woundcare Svcs</del> Sr. Administrative Director, Ancillary Svcs.	1	-	-	-
Assistant Director Cardiology		2		
Assistant Director Medical Records			3	
Assistant Director of Respiratory Care & Neurodiag			3	
Cardiology Supervisor Clinical			3	
Cardiovascular Diagnostic Center Manager			3	
Chief Biomed Engineer			3	
Chief Financial Officer	1			
Chief Medical Officer	1			
Chief Nursing Officer	1			
Chief of Staff			3	4
Chief Operating Officer	1			
Clinical Assistant Director NICU			3	
Clinical Assistant Director Surgical Suite			3	
Clinical Manager			3	
DI/Mammography Manager			3	
Director Clinical Informatics			3	
Director Community Development & CMN			3	
<del>Director Education and PCS w/Masters</del> Manager Education			3	
Director Medical Staff Services			3	
<del>Director of Ambulatory Medical Informatics</del> Director Physician Integration and Business Development			3	
Director of <del>Physician Relations &amp;</del> Managed Care			3	
Director of Resource Management		2		
Director of <del>Volunteer Services</del> Community Development & Programs		2		
Director of Women's & Children's Services		2		
Director Pt Financial Svcs/Pt Registration	1			
Director Quality Management Services			43	

<sup>1</sup> Public officials who manage public investments are not covered by the Conflict of Interest Code because they must file a statement of economic interests pursuant to Government Code section 87200. Therefore, those positions are listed below for information purposes only:

Members of the Board of Directors  
President / Chief Executive Officer

An individual holding one of the above-listed positions may contact the Fair Political Practices Commission for assistance or written advice regarding their filing obligations if they believe their position has been categorized incorrectly. The Fair Political Practices Commission makes the final determination whether a position is covered by Government Code Section 87200.

*SVMHS Conflict of Interest Code*  
Page 2 of 6

Designated Positions

Assigned Disclosure Category

Director Revenue Integrity & Compliance			3	
Employee Health Manager			3	
<del>Executive Sr. Admin Dir Nutrition &amp; Environmental Svcs</del>	<u>1</u>		<del>3</del>	
<del>Executive Sr. Director Plant Ops/Hosp Constr</del>	1			
Foundation Director			3	
<del>Infection Control Preventionist Manager – Director Infection Control</del>			3	
Lab Manager			3	
<del>Manager Clinical Documentation &amp; Coding</del>	-	-	<del>3</del>	-
Manager Risk, Patient Safety & Patient Relations			3	
Manager Security and Off-Site Facil & Constr			3	
Nursing Director		2		
Senior Administrative Director Human Resources	1			
Senior Administrative Director Patient Care Svcs	1			
Sleep Medicine Center Manager			3	
Sr Admin Director Cardiopulmonary Services & Sleep Medicine	1			
<del>Sr Administrative Director Marketing, Government &amp; PR</del> Chief Strategic Communications Officer	1			
Sr. Admin. Director Information Technology	1			
<del>Sr. Administrative Director H.I.M./Registration</del> Privacy Officer	1			
Sr. Administrative Director Resource Management	1			
Warehouse Manager			3	
Consultants / New Positions <sup>2</sup>				

<sup>2</sup> Consultants are included in the list of designated positions. For purposes of this Code, "consultant" has the same meaning as set forth in 2 Cal. Code Regs., tit. 2, section 18701(a)(2), as it may be amended from time, but which reads as follows as of adoption of this restated and amended Conflict-of-Interest Code:

"Consultant" means an individual who, pursuant to a contract with a state or local government agency:

(A) Makes a governmental decision whether to:

1. Approve a rate, rule, or regulation;
2. Adopt or enforce a law;
3. Issue, deny, suspend, or revoke any permit, license, application, certificate, approval, order, or similar authorization or entitlement;
4. Authorize the agency to enter into, modify, or renew a contract provided it is the type of contract which requires agency approval;
5. Grant agency approval to a contract which requires agency approval and in which the agency is a party or to the specifications for such a contract;
6. Grant agency approval to a plan, design, report, study, or similar item;
7. Adopt, or grant agency approval of, policies, standards, or guidelines for the agency, or for any subdivision thereof; or

(B) Serves in a staff capacity with the agency and in that capacity participates in making a governmental decision or performs the same or substantially all the same duties for the agency that would otherwise be performed by an individual holding a position specified in the agency's Conflict of Interest Code.

Consultants to, and new positions of, the Salinas Valley Memorial Healthcare System shall be subject to disclosure under Category 1, subject to the following limitation:

The President / Chief Executive Officer may determine in writing that a particular consultant or new position, although a "designated position," is hired to perform a range of duties that is limited in scope and thus is not required to comply with the disclosure requirements of Category 1. In such cases, the President / Chief Executive Officer may designate a different disclosure requirement. Such determination must be made in writing and shall include a description of the consultant's or new position's duties and, based upon that description, a statement of the extent of the consultant's or new position's disclosure requirements. Such determination by the President / Chief Executive Officer is a public record and shall be retained for public inspection in the same manner and location as the Agency's Conflict of Interest Code.

**CONFLICT OF INTEREST CODE OF THE  
SALINAS VALLEY MEMORIAL HEALTHCARE SYSTEM  
APPENDIX B: DISCLOSURE CATEGORIES**

General Provisions Applicable to All Categories

When an individual who holds a designated position is required to disclose investments and sources of income, he or she shall disclose investments in business entities and sources of income which do business in the jurisdiction, plan to do business in the jurisdiction, or have done business in the jurisdiction within the past two years. In addition to other activities, a business entity is doing business within the jurisdiction if it owns real property within the jurisdiction.

When an individual who holds a designated position is required to disclose sources of income, he or she shall include gifts received from donors located inside as well as outside the jurisdiction.

When an individual who holds a designated position is required to disclose interests in real property, he or she shall disclose real property if it is located within the jurisdiction, or not more than two miles outside the boundaries of the jurisdiction, or within two miles of any land owned or used by Agency.

When an individual who holds a designated position is required to disclose business positions, he or she shall disclose positions in business entities that do business in the jurisdiction, plan to do business in the jurisdiction, or have done business in the jurisdiction within the past two years.

For purposes of this Conflict of Interest Code, the jurisdiction of the Salinas Valley Memorial Healthcare System is Monterey County.

Category 1

A designated position in this category must report all investments, business positions, interests in real property, and sources of income, including gifts, loans, and travel payments.

Category 2

A designated position in this category must report all investments, business positions, and sources of income, including gifts, loans, and travel payments.

Category 3

A designated position in this category must report all investments, business positions and income, including gifts, loans, and travel payments, from sources which are of the type to supply materials, products, supplies, commodities, services, machinery, vehicles, or equipment utilized by the Agency.

Category 4

A designated position in this category must report all investments, business positions and income, including gifts, loans, and travel payments, from sources which are of the type to receive grants or other monies from or through the Agency.