

CONFLICT OF INTEREST CODE

OF THE

VENTURA COUNTY MEDI-CAL MANAGED CARE COMMISSION DBA GOLD COAST HEALTH PLAN

(Amended ~~October 29, 2018~~ April 26, 2021)

The Political Reform Act (Gov. Code § 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 (2 Cal. Code of Regs. § 18730 that 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 Section 18730 may be amended by the Fair Political Practices Commission to conform to amendments in the Political Reform Act. Therefore, the terms of 2 California Code of Regulations Section 18730 and any amendments to it duly adopted by the Fair Political Practices Commission are hereby incorporated by reference. This incorporation page, Regulation 18730 and the attached Appendix designating positions and establishing disclosure categories, shall constitute the conflict of interest code of the **Gold Coast Health Plan (the "Plan")**.

All officials and designated positions required to submit a statement of economic interests shall file their statements with the **Clerk to the Commission** as the Plan's Filing Officer. The **Clerk to the Commission** shall make and retain a copy of all statements filed by Members of the Commission and the Chief Executive Officer, and forward the originals of such statements to the Clerk of the Ventura County Board of Supervisors. The **Clerk to the Commission** shall retain the original statements filed by all other designated

positions and make all retained statements available for public inspection and reproduction during regular business hours. (Gov. Code Section 81008.)

APPENDIX

CONFLICT OF INTEREST CODE OF THE GOLD COAST HEALTH PLAN

(Amended ~~October 29, 2018~~ April 26, 2021)

PART “A”

OFFICIALS WHO MANAGE PUBLIC INVESTMENTS

District Officials who manage public investments, as defined by 2 Cal. Code of Regs. § 18700.3(b), are NOT subject to the District’s Code, but are subject to the disclosure requirements of the Act. (Government Code Section 87200 et seq.). [Regs. § 18730(b)(3)] These positions are listed here for informational purposes only.

It has been determined that the positions listed below are officials who manage public investments¹:

Commissioners
Chief Financial Officer

¹ Individuals 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 that their position has been categorized incorrectly. The Fair Political Practices Commission makes the final determination whether a position is covered by § 87200.

DESIGNATED POSITIONS

GOVERNED BY THE CONFLICT OF INTEREST CODE

DESIGNATED EMPLOYEES' TITLE OR FUNCTION

DISCLOSURE CATEGORIES ASSIGNED

<u>Associate Chief Medical Officer</u>	<u>4</u>
<u>Associate Clerk of the Board/Sr. Executive Assistant</u>	<u>4</u>
Chief Administrative Officer	5
<u>Chief Compliance Officer</u>	<u>1, 2</u>
Chief Diversity Officer	6
Chief Executive Officer	1, 2
Chief Medical Officer	4
Chief Operating Officer	4, 6
<u>Clerk of the Board/Sr. Executive Assistant</u>	<u>4</u>
Contracts Manager	4
<u>Director, Care Management</u>	<u>4</u>
<u>Director, Compliance</u>	<u>5</u>
Director, Financial Analysis	4
<u>Director, Finance</u>	<u>1, 2</u>
Director, Government & Community Relations [Duties now being handled by Executive Director, Strategy and External Affairs]	<u>4</u>
Director, Health Education, Cultural & Linguistic Services	5
Director, Medical	5
<u>Director, Network Operations</u>	<u>5</u>
Director, Operations	4
Director, Pharmacy	5
Director, Quality Improvement	5
Director, Strategy & Enterprise Analytics	4
<u>Director, Utilization Management</u>	<u>4</u>
Executive Director, Health Services	5
Executive Director, Human Resources <u>& Facilities</u>	5

DESIGNATED EMPLOYEES'
TITLE OR FUNCTION

DISCLOSURE CATEGORIES
ASSIGNED

<u>Executive Director, Strategy & External Affairs</u>	<u>5</u>
Manager, Care Management	5
Manager, Claims Transactions	5, 6
<u>Manager, Business Solutions</u>	<u>5</u>
<u>Manager, Decision Support Services</u>	<u>5</u>
<u>Manager, Facilities</u>	<u>4</u>
<u>Manager, Grievance and Appeals</u>	<u>5</u>
<u>Manager, Human Resources</u>	<u>5, 6</u>
Manager, Information Security	5
Manager, IT Infrastructure <u>& Operations-</u>	5
Manager, Member Services	5
Manager, Operations Support Services	4
Manager, Procurement Operations and Sourcing	4
Manager, Project Management Organization	5
Manager, Quality Improvement	5
Manager, Quality Improvement Project	5
<u>Manager, Utilization Management</u>	<u>4</u>
<u>Privacy Officer</u>	<u>5</u>
Procurement Officer	4
Project Manager (ALL)	5
Purchasing Coordinator	4
Senior Corporate Attorney	4
Senior Director, Information Technology	5
Senior Director, Network Management	5
<u>Senior Director, Operations</u>	<u>4</u>
<u>Senior Director, Population Health and Equity</u>	<u>4</u>
<u>Sr. Manager, Communications & Marketing</u>	<u>4</u>
Supervisor, Claims	6

DESIGNATED EMPLOYEES'
TITLE OR FUNCTION

DISCLOSURE CATEGORIES
ASSIGNED

MEMBERS OF BOARDS,
COMMITTEES AND COMMISSIONS

Provider Advisory Committee

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Consultants and New Positions²

² Individuals providing services as a Consultant defined in Regulation 18700.3 or in a new position created since this Code was last approved that makes or participates in making decisions shall disclose pursuant to the broadest disclosure category in this Code subject to the following limitation:

The Chief Executive Director may determine that, due to the range of duties or contractual obligations, it is more appropriate to assign a limited disclosure requirement. A clear explanation of the duties and a statement of the extent of the disclosure requirements must be in a written document. (Gov. Code Sec. 82019; FPPC Regulations 18219 and 18734.) The Chief Executive Director'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. (Gov. Code Sec. 81008.)

PART “B”

DISCLOSURE CATEGORIES

The disclosure categories listed below identify the types of economic interests that the designated position must disclose for each disclosure category to which he or she is assigned. “Investment” means financial interest in any business entity (including a consulting business or other independent contracting business) and are reportable if they are either located in, doing business in, planning to do business in, or have done business during the previous two years in the jurisdiction of the Agency.

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 the Agency, including any leasehold, beneficial or ownership interest or option to acquire property.

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 Agency.

Category 3: All investments and business positions in business entities, and sources of income, including gifts, loans and travel payments, that are engaged in land development, construction or the acquisition or sale of real property within the jurisdiction of the Agency.

Category 4: All investments and business positions in business entities, and sources of income, including gifts, loans and travel payments, that provide services, products, materials, machinery, vehicles or equipment of a type purchased or leased by the Agency.

Category 5: All investments and business positions in business entities, and sources of income, including gifts, loans and travel payments, that provide services, products, materials, machinery, vehicles or equipment of a type purchased or leased by the designated position’s department, unit or division.

Category 6: All investments and business positions in business entities, and sources of income, including gifts, loans and travel payments, if such entities or sources have filed claims against the Agency in the past 2 years, or have a claim pending before the Agency.