2018 Local Agency Biennial Notice

Name of Agency: Ventura County Medi-cal Managed Care Commission dba Gold Coast Health Plan

Mailing Address: 711 E Daily Drive #106 Camarillo, CA 93010

Contact Person: Maddie Gutierrez, CMC Phone No. 805-437-5512

Email: mngutierrez@goldchp.org Alternate Email:

Accurate disclosure is essential to monitor whether officials have conflicts of interest and to help ensure public trust in government. The biennial review examines current programs to ensure that the agency's code includes disclosure by those agency officials who make or participate in making governmental decisions.

This agency has reviewed its conflict of interest code and has determined that (check one BOX):

☑ An amendment is required. The following amendments are necessary:

(Check all that apply.)

• Include new positions
• Revise disclosure categories
• Revise the titles of existing positions
• Delete titles of positions that have been abolished and/or positions that no longer make or participate in making governmental decisions
• Other (describe) **Adopt FPPC Standard Code format**

☐ The code is currently under review by the code reviewing body.

☐ No amendment is required. (If your code is over five years old, amendments may be necessary.)

Verification (to be completed if no amendment is required)

This agency's code accurately designates all positions that make or participate in the making of governmental decisions. The disclosure assigned to those positions accurately requires that all investments, business positions, interests in real property, and sources of income that may foreseeably be affected materially by the decisions made by those holding designated positions are reported. The code includes all other provisions required by Government Code Section 87302.

[Signature of Chief Executive Officer] [Date: 9/26/18]

All agencies must complete and return this notice regardless of how recently your code was approved or amended. Please return this notice no later than October 1, 2018, or by the date specified by your agency, if earlier, to:

Board of Supervisors
800 S. Victoria Avenue
Ventura, CA 93009-1920

PLEASE DO NOT RETURN THIS FORM TO THE FPPC.
RESOLUTION NO. 2018 – 001

RESOLUTION OF THE VENTURA COUNTY MEDI-CAL MANAGED CARE COMMISSION, DOING BUSINESS AS THE GOLD COAST HEALTH PLAN, AMENDING THE CONFLICT OF INTEREST CODE

WHEREAS, the State of California enacted the Political Reform Act of 1974, Government Code section 81000 et seq. (the "Act"), which contains provisions relating to conflicts of interest which potentially affect all officers, employees and consultants of the Ventura County Medi-Cal Managed Care Commission, doing business as the Gold Coast Health Plan (the "Plan") and requires all public agencies to adopt and promulgate a Conflict of Interest Code; and

WHEREAS, the Commission adopted a Conflict of Interest Code (the "Code") in compliance with the Act; and

WHEREAS, subsequent changed circumstances within the Plan have made it advisable and necessary pursuant to Sections 87306 and 87307 of the Act to amend and update the Plan’s Code; and

WHEREAS, the potential penalties for violation of the provisions of the Act are substantial and may include criminal and civil liability, as well as equitable relief which could result in the Plan being restrained or prevented from acting in cases where the provisions of the Act may have been violated; and

WHEREAS, notice of the time and place of a public meeting on, and of consideration by the Commission of, the proposed amended Code was provided each affected designated position and publicly posted for review at the offices of the Plan; and

WHEREAS, a public meeting was held upon the proposed amended Code at a regular meeting of the Commission on October 29, 2018, at which all present were given an opportunity to be heard on the proposed amended Code.

NOW, THEREFORE, BE IT RESOLVED by the Members of the Ventura County Medi-Cal Managed Care Commission, doing business as the Gold Coast Health Plan as follows:

Section 1. The Commission does hereby adopt the proposed amended Conflict of Interest Code, a copy of which is attached hereto;

Section 2. The Conflict of Interest Code shall be on file with the Clerk to the Commission and available to the public for inspection and copying during regular business hours;

Section 3. The Conflict of Interest Code shall be submitted to the Board of Supervisors of the County of Ventura for approval and said Code shall become effective immediately after the Board of Supervisors approves the proposed amended Code as submitted.

Section 4. All previous Conflict of Interest Codes of the Plan shall be rescinded as of the effective date of the said proposed code as approved by the County of Board of Supervisors.
PASSED, APPROVED AND ADOPTED by the Ventura County Medi-Cal Managed Care Commission at a regular meeting on the 29th day of October, 2018, by the following vote:

AYE: Antonio Alatorre, Shawn Atin, Lanyard Dial, M.D., Narcisa Egan, Kelly Long, Debra Herwaldt

NAY: None.

ABSTAIN: None.

ABSENT: Theresa Cho, M.D., Laura Espinosa, Johnson Gill, Gagan Pawar, M.D., Jennifer Swenson

Antonio Alatorre, Chair

Attest:

Maddie Gutierrez, Clerk to the Commission

I, Maddie Gutierrez, Clerk of the Board of the Ventura County Medi-Cal Managed Care Commission, dba Gold Coast Health Plan, hereby certify that Resolution No. 2018-001, was adopted at the October 29, 2018, Commission Meeting and that is a true and correct copy of said document on file in my office.

Dated this 29 day of October, 2018.
AGENDA ITEM NO. 4

TO: Ventura County Medi-Cal Managed Care Commission

FROM: Scott Campbell, General Counsel

DATE: October 29, 2018

SUBJECT: Resolution Adopting an Amended Conflict of Interest Code Pursuant to the Political Reform Act of 1974

SUMMARY:

Pursuant to Section 87306.5 of the Political Reform Act (the "Act"), the County Board of Supervisors directed to Gold Coast Health Plan to (1) conduct a review of the Plan's Conflict of Interest Code ("Code") to determine if a change in the Code was necessary; (2) file a biennial notice regarding the results of the review no later than the required deadline, and (3) amend the Plan's Code pursuant to the Act, if necessary.

During the review process, staff found that amendments to the Plan's Conflict of Interest Code are necessary. A redlined version of the proposed amended Code is attached.

RECOMMENDATION:

It is recommended that the Commission adopt Resolution No. 2018-001 adopting the amended Conflict of Interest Code pursuant to the Political Reform Act of 1974.

The Political Reform Act of 1974, Government Code section 81000 et seq. (the "Act"), requires all public agencies to adopt and maintain a Conflict of Interest Code. The Act further requires that agencies regularly review and update their Codes as necessary when directed by the code-reviewing body or when change is necessitated by changed circumstances (Sections 87306 and 87306.5). The Board of Supervisors is the Plan's code-reviewing body and directed that the Code be reviewed as required under the Act. During this review, staff found that amendments to the Code are necessary.

Attached is a redlined version of the proposed amended Code showing that the proposed revisions are based on the establishment and recognition of new positions that must be designated, to delete positions that no longer exist or participate in decision-making, revise disclosure categories, remove and declare positions involved in the investment of public funds and required to file under the Act, and adopt the standard code format of the Fair Political Practices Commission.

Attachment: Legislative Version of Proposed Amended Conflict of Interest Code.
CONFLICT OF INTEREST CODE

OF THE

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

(Amended October 29, 2018)

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)

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 investments^1:

Commissioners
Chief Financial Officer

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^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.

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## DESIGNATED POSITIONS

**GOVERNED BY THE CONFLICT OF INTEREST CODE**

<table>
<thead>
<tr>
<th>DESIGNATED EMPLOYEES’ TITLE OR FUNCTION</th>
<th>DISCLOSURE CATEGORIES ASSIGNED</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chief Administrative Officer</td>
<td>5</td>
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<tr>
<td>Chief Diversity Officer</td>
<td>6</td>
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<tr>
<td>Chief Executive Officer</td>
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<tr>
<td>Chief Medical Officer</td>
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<tr>
<td>Chief Operating Officer</td>
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<tr>
<td>Contracts Manager</td>
<td>4</td>
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<tr>
<td>Director, Financial Analysis</td>
<td>4</td>
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<tr>
<td>Director, Government &amp; Community Relations</td>
<td>1</td>
</tr>
<tr>
<td>Director, Health Education, Cultural &amp; Linguistic Services</td>
<td>5</td>
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<tr>
<td>Director, Medical</td>
<td>5</td>
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<tr>
<td>Director, Operations</td>
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<tr>
<td>Director, Pharmacy</td>
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<td>Director, Quality Improvement</td>
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<tr>
<td>Director, Strategy &amp; Enterprise Analytics</td>
<td>4</td>
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<tr>
<td>Executive Director, Health Services</td>
<td>5</td>
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<tr>
<td>Executive Director, Human Resources</td>
<td>5</td>
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<tr>
<td>Manager, Care Management</td>
<td>5</td>
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<tr>
<td>Manager, Claims Transactions</td>
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<tr>
<td>Manager, Information Security</td>
<td>5</td>
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<tr>
<td>Manager, IT Infrastructure</td>
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<tr>
<td>Manager, Member Services</td>
<td>5</td>
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<tr>
<td>Manager, Operations Support Services</td>
<td>4</td>
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<tr>
<td>Manager, Procurement Operations and Sourcing</td>
<td>4</td>
</tr>
<tr>
<td>Manager, Project Management Organization</td>
<td>5</td>
</tr>
<tr>
<td>Manager, Quality Improvement</td>
<td>5</td>
</tr>
<tr>
<td>Manager, Quality Improvement Project</td>
<td>5</td>
</tr>
</tbody>
</table>

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DESIGNATED EMPLOYEES' TITLE OR FUNCTION

Procurement Officer
Project Manager (ALL)
Purchasing Coordinator
Senior Corporate Attorney
Senior Director, Information Technology
Senior Director, Network Management
Supervisor, Claims

MEMBERS OF BOARDS, COMMITTEES AND COMMISSIONS

Provider Advisory Committee

Consultants and New Positions

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.)

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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.

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.
CONSENT – COUNTY EXECUTIVE OFFICE – Adoption of Conflict of Interest Codes for 118 Local Agencies; and Receive and File 2018 Biennial Notices.

(X) All Board members are present.

(X) Upon motion of Supervisor Long, seconded by Supervisor Zaragoza, and duly carried, the Board hereby approves the recommendations as stated in the respective Board letters for Consent Items 12 - 33.

By: [Signature]
Lori Gaines
Deputy Clerk of the Board