

2018 Local Agency Biennial Notice

SEP 28 2018

Clerk of the Board

Name of Agency: Ventura County Medi-cal Managed Care Commission dba Gold Coast Health PlanMailing Address: 711 E Daily Drive #106 Camarillo, CA 93010Contact Person: Maddie Gutierrez, CMC Phone No. 805-437-5512Email: mgutierrez@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.

Dale Villanueva
Signature of Chief Executive Officer

9/26/18
Date

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

30 October 2018

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

Clerk of the Board

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 30 October 2018

Clerk of the Board

**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 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

<u>DESIGNATED EMPLOYEES'</u> <u>TITLE OR FUNCTION</u>	<u>DISCLOSURE CATEGORIES</u> <u>ASSIGNED</u>
Chief Administrative Officer	5
Chief Diversity Officer	6
Chief Executive Officer	1, 2
Chief Medical Officer	4
Chief Operating Officer	4, 6
Contracts Manager	4
Director, Financial Analysis	4
Director, Government & Community Relations	1
Director, Health Education, Cultural & Linguistic Services	5
Director, Medical	5
Director, Operations	4
Director, Pharmacy	5
Director, Quality Improvement	5
Director, Strategy & Enterprise Analytics	4
Executive Director, Health Services	5
Executive Director, Human Resources	5
Manager, Care Management	5
Manager, Claims Transactions	5, 6
Manager, Information Security	5
Manager, IT Infrastructure	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

App. A-2

DESIGNATED EMPLOYEES'
TITLE OR FUNCTION

DISCLOSURE CATEGORIES
ASSIGNED

Procurement Officer	4
Project Manager (ALL)	5
Purchasing Coordinator	4
Senior Corporate Attorney	4
Senior Director, Information Technology	5
Senior Director, Network Management	5
Supervisor, Claims	6

MEMBERS OF BOARDS,
COMMITTEES AND COMMISSIONS

Provider Advisory Committee	4
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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.)

App. A-3

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.

**LEGISLATIVE VERSION – SHOWS CHANGES MADE
[UPDATED TO COMPLY WITH FPPC FORMAT. ALL
PREVIOUS PROVISIONS DELETED.]**

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.)

**OFFICIALS WHO MANAGE PUBLIC INVESTMENTS MUST
FILE UNDER THE POLITICAL REFORM ACT AND ARE NOT
DESIGNATED IN THE DESIGNATED POSITIONS LIST OR
ASSIGNED DISCLOSURE CATEGORIES UNDER THE CODE.**

DESIGNATED POSITIONS AND FILING OFFICERS

~~Based on the foregoing, the following agency positions and/or consultants qualify as "other officials who manage public investments" and shall file Statements of Economic Interests (Form 700) pursuant to Government Code Section 87200 et seq. with the below designated Filing Officers:~~

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 investments¹:~~

Position	Disclosure Category	Filing Officer (Designate County Clerk of Board [COB] or Local Agency's Clerk [AC])
Commissioners	1	COB
Chief Executive Officer	1	COB
Chief Financial Officer	1	COB

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.~~

**CONFLICT OF INTEREST CODE
VENTURA COUNTY MEDICAL MANAGED CARE COMMISSION**

Exhibit "A": Designated Positions
DESIGNATED POSITIONS

GOVERNED BY THE CONFLICT OF INTEREST CODE

<u>DESIGNATED EMPLOYEES'</u> <u>TITLE OR FUNCTION</u>	<u>DISCLOSURE CATEGORIES</u> <u>ASSIGNED</u>
Associate, Chief Director, Medical Officer	45 narrowed
Care Manager, RN, Disease Management	2
Case/Care Management, Social Worker	2
Chief Administrative Officer	5 narrowed
Chief Diversity Officer	46 narrowed
Chief Executive Officer	1, 2
Chief Information & Strategy Officer	1
Chief Medical Officer	44 narrowed
Chief Operating Officer	44, 6 narrowed
Clerk of the Board	3
Compliance Delegation Oversight Specialist	2
Controller	1
Credentialing Coordinator	3
Delegation Oversight Auditor	2
Director, Communications and Marketing	1
Director, Education Disease Management	1
Director, Financial Analysis	44 narrowed
Director, Government & Community Relations	1
Director, Health Education, Cultural & Linguistic Services	5
Senior Director, Information Technology	45 narrowed
Director, Network Operations	15 narrowed
Director, Operations	44 narrowed
Director, Pharmacy	45 narrowed

<u>DESIGNATED EMPLOYEES'</u> <u>TITLE OR FUNCTION</u>	<u>DISCLOSURE CATEGORIES</u> <u>ASSIGNED</u>
Director, Quality Improvement	4 5 narrowed
Director, Strategy & Enterprise Analytics	4
Executive Director, Government Regulatory	1
Executive Director, Human Resources	5
Financial Analyst I	2
HIPPA Program Manager Privacy Officer	2
Manager, Care Coordination	2
Manager, Care Management	2 5 narrowed
Manager, Claims Transactions	25 , 6 narrowed
Manager, Clinical Strategy Execution	2
Manager, Compliance	2
Manager, Decision Support	3
Manager, Grievance and Appeals	2
Manager, Health Services	2
Manager, Information Security	5
Manager, IT Infrastructure	4 5 narrowed
Manager, Member Services	2 5 narrowed
Manager, Operations Support Services	24 same
Manager, Procurement Operations and Sourcing	14 narrowed
Manager, Project Management Organization	2 5 narrowed
Manager, Provider Relations	2
Manager, Quality Improvement	3 5 narrowed
Manager, Utilization Management	2
Officer/Director, Compliance	1
Pharmacist	3
Procurement Coordinator	2
Procurement Officer	14 narrowed
Project Manager <u>(ALL)</u>	3 5 narrowed
Provider Advisory Committee Members	2 Moved below

DESIGNATED EMPLOYEES'
TITLE OR FUNCTION

DISCLOSURE CATEGORIES
ASSIGNED

Provider Contracts Manager	34 same
Purchasing Coordinator	34 narrowed
Quality Improvement Data Analyst	3
Manager. Quality Improvement Project Manager	25
RN Lead, Case/Care Management	2
RN Lead, Health Services Trainer	2
RN, Case/Care Management	2
RN, Delegation Oversight Auditor	2
RN, Discharge	2
RN, Disease Management	2
RN, Master Trainer Facility Site Review	2
RN, Utilization Management	2
Senior Business System Analyst	3
Senior Buyer	1
Senior Corporate Attorney	4
Senior Executive Director, Health Services	15 narrowed
Senior Director, Human Resources	1
Senior Director, Network Management	25
Manager, Senior Information Security Analyst	25
Senior IT Business Analyst	3
Senior Manager, Delegation Oversight	2
Senior Project Manager	2 see Project Manager
Senior SQL Developer	2
Senior Staff Accountant	3
SQL Developer	3
Supervisor, Claims	26 narrowed
Vendor Contract Manager	3

DESIGNATED EMPLOYEES'
TITLE OR FUNCTION

DISCLOSURE CATEGORIES
ASSIGNED

MEMBERS OF BOARDS,
COMMITTEES AND COMMISSIONS

Provider Advisory Committee

4

Employees in applicable newly created positions
Consultants and New Positions²

~~Consultants, as defined by Title 2, California Code of Regulations section 18701(a)(2), shall disclose pursuant to the broadest disclosure category in this code subject to the following limitation: The Chief Executive Officer (CEO) may determine in writing that a particular consultant, although a "designated position", is hired to perform a range of duties that is limited in scope and thus is not required to fully comply with the disclosure requirements 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 is to be retained for public inspection in the same manner and location as this Conflict of Interest Code.~~

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.)

~~Title 2, California Code of Regulations Section 18701(a)(2) reads as follows:~~

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

- ~~_____ (A) Makes a governmental decision whether to:~~
 - ~~_____ (i) Approve a rate, rule, or regulation;~~
 - ~~_____ (ii) Adopt or enforce a law;~~
 - ~~_____ (iii) Issue, deny, suspend, or revoke any permit, license, application, certificate, approval, order, or similar authorization or entitlement;~~
 - ~~_____ (iv) Authorize the agency to enter into, modify, or renew a contract provided it is the type of contract that requires agency approval;~~
 - ~~_____ (v) Grant agency approval to a contract that requires agency approval and to which the agency is a party, or to the specifications for such a contract;~~
 - ~~_____ (vi) Grant agency approval to a plan, design, report, study, or similar item;~~
 - ~~_____ (vii) Adopt, or grant agency approval of, policies, standards, 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 as defined in regulation 18702.2 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 under Government Code Section 87302.~~

~~The CEO may determine in writing that a particular consultant, although in a "designated position" is hired to perform a range of duties that is limited in scope and therefore is not required to fully comply with the disclosure requirements described herein. Such written determination shall include a description of the consultant's duties, and based upon that description, a statement of the extent of disclosure required. The CEO determination is a public record which shall be retained for public inspection in the same manner and location as this conflict of interest code.~~

CONFLICT OF INTEREST CODE
VENTURA COUNTY MEDICAL MANAGED CARE COMMISSION

Exhibit "B": Disclosure Categories

PART "B"

DISCLOSURE CATEGORIES

The disclosure categories ~~set forth~~listed below ~~specify which kinds of financial interests are reportable by the designated employees in their individual Statements of Economic Interests.~~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, and business positions in business entities that are located in, do business in, Ventura County, planning to do business in Ventura County, or have done business in Ventura County within the past two (2) years; and all interest in real property which is located in whole or in part within, or not more than two (2) miles outside of the boundaries of Ventura County or own real property within the jurisdiction of the Agency.

Category 2: (see Category 4) ~~Persons in this category shall disclose all investments, income and business positions in:~~

- ~~a. Health care providers or other business entities under contract with or under consideration to contract with VCMMCC;~~
- ~~b. Business entities engaged in the delivery of health care services or supplies, or services or supplies ancillary thereto of a type to be provided or arranged for by VCMMCC;~~
- ~~c. Business entities that provide services, supplies, materials, machinery or equipment of a type purchased or leased by VCMMCC; and Business entities subject to the regulatory, permitting or licensing authority of VCMMCC.~~

~~"Income" means a payment received, including, but not limited to, any salary, wage, advance, dividend, interest, rent, proceeds from any sale, gift, loan forgiveness or payment of indebtedness, reimbursement of expenses, per diem, or contribution to an insurance or pension program paid by any person other than an employer, and including any community property interest in the income of a spouse.~~

~~"Investment" means any financial interest in or security issued by a business entity, including, but not limited to, common stock, preferred stock, warrants, options, debt instruments and any partnership or other ownership interest owned directly, indirectly or~~

~~beneficially by the designate employee if that business entity owns property in Ventura County or does, or has done business in Ventura County at any time within the preceding two (2) years. Assets with a fair market value of less than \$1,000 do not constitute reportable investments. The term investment does not include: (i) a time or demand deposit in a financial institution; (ii) shares in a credit union; (iii) an insurance policy; (iv) interest in a diversified mutual fund registered with the Securities and Exchange Commission; or (v) any bond for debt instrument issued by any government or governmental agency.~~

~~"Business entity" means any organization or enterprise, whether operated for profit or not, including, but not limited to, a sole proprietorship, partnership, firm, business, trust, joint venture, syndicate, corporation or association.~~

~~"Business position" is a position of director, officer, partner, trustee, employee or any other position of management in a business entity.~~

~~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:** (see new Categories 4 or 5) Persons in this category shall disclose all business positions, investments in, or income (including gifts and loans) received from business entities that manufacture, provide, or sell services and/or supplies of a type utilized by VCOMMCC and associated with the job assignment of designated positions assigned in this disclosure category. 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:** New employee'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 is to be retained for public inspection in the same manner and location as this Code. 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.~~