
From: Diaz-Greco, Gilma M. (COE)
Sent: Thursday, September 24, 2015 1:17 PM
To: Sanchez, Rodzandra (COE)
Subject: Chris Kokoruda, Assistant County Attorney, Miami-Dade County INQ 15-199 (travel expenses)

[INQ 15-199 Kokoruda](#)

From: Centorino, Joseph (COE)
Sent: Thursday, September 03, 2015 6:16 PM
To: Diaz-Greco, Gilma M. (COE); Perez, Martha D. (COE)
Subject: INQ 15-199 Chris Kokoruda, Assistant County Attorney, Miami-Dade County

Chris Kokoruda, Assistant County Attorney, Miami-Dade County inquired regarding whether it would be permissible for two individuals associated with Holtz Children's Hospital, a part of Jackson Health Systems, to accept reimbursement for travel or lodging expenses from a JHS vendor, at a training session to take place in Cincinnati. One of the individuals is a physician, a UM employee working under a JHS contract with UM, and the other individual is a nurse practitioner, an ARNP, who is a JHS employee.

I advised Mr. Kokoruda that, in the case of the JHS employee, section 2-11.1(w) would not permit payment of travel or travel-related expenses by a JHS contractor. Assuming that there is no contractual requirement that such training be provided and paid for by the contractor, the only permissible way for that to occur would be for the Public Health Trust board to vote to waive the requirements of Section 2-11.1(w). I did suggest that in this case such a waiver may well be justified, given that the purpose of the travel was clearly job-related and would be for the benefit of JHS rather than for any individual's personal benefit. In regard to the UM physician, I advised that it should be determined whether, pursuant to the contract between UM and JHS or any internal policies of JHS concerning contract physicians, such an individual is expected to adhere to the Miami-Dade County Conflict of Interest and Code of Ethics Ordinance. If that is the case, the same prohibition would apply. If that is not the case, then the reimbursed expenses could be accepted for that individual's attendance since Section 2-11.1(w) is not automatically applicable to independent contractors or contract staff.