

Meyers, Robert (COE)

INQ 07-135

From: Meyers, Robert (COE)
Sent: Wednesday, August 15, 2007 1:44 PM
To: Withers, Barbara (CAA)
Subject: RE: Request for an Opinion

Dear Ms. Withers:

Thank you for your request for opinion. In order to respond to your question, I need more information about the Family Christian Association of America, Inc. Is this a not-for-profit organization? If so, there is no conflict under the county ethics code for you to maintain oversight responsibility for the agency that formerly employed you as long as you treat your former agency in the same manner you treat the other delegate agencies under your supervision.

The Two Year Rule, which you reference in your e-mail, applies to County employees who were previously employed by for-profit firms.

If you have any additional questions, feel free to contact me at your convenience.

Sincerely,

Robert Meyers, Executive Director
Miami-Dade Commission on Ethics and Public Trust
(305) 350-0613

From: Withers, Barbara (CAA)
Sent: Tuesday, August 14, 2007 4:53 PM
To: Meyers, Robert (COE)
Cc: Robinson, Jane (CAA); Edwards, Julie (CAA)
Subject: Request for an Opinion

Dear Mr. Meyers,

I am requesting an opinion regarding a conflict of interest that may exist because of my former employment. The facts are outlined below.

I am currently employed with Miami Dade CAA Head Start Division as the Service Area Administrator. As such, I have oversight responsibility for assuring that delegate agencies under contract with CAA (to provide services to Head Start children and families) are in compliance with the federal Performance Standards and other requirements of the contract. I also provide training and technical assistance to the delegate agencies regarding compliance issues.

I was previously employed by the Family Christian Association of America, Inc., a Head Start Delegate Agency as the Vice President/CDO. My employment with FCAA ended in July 2006 (less than 2 years ago).

Please let me know if there is a conflict in this situation.

Thank you.

Barbara B. Withers, Service Areas Administrator
Miami Dade County Community Action Agency
Head Start/Early Head Start Division
395 NW First Street
Miami, FL 33128
(305) 347-4618 - Voice
(305) 372-7623 - Fax
"Delivering Excellence Every Day"