

Frigo, Victoria (COE)

From: Frigo, Victoria (COE)
Sent: Thursday, November 10, 2011 11:52 AM
To: Brown, Clarence D. (PHCD)
Cc: Centorino, Joseph (COE)
Subject: INQ 11-171 County Employee Participating in County Homeownership Program

Mr. Brown,

The Ethics Code allows an employee of the Public Housing & Community Development Department to accept assistance through a homeownership program administered by the Housing Department if the employee otherwise qualifies for the program and he does not *participate* in administering the program.

Although County employees are generally prohibited from contracting with their own departments, the exception stated above is provided in the County Ethics Code at Sec. 2-11.1 (c)(5)(5). *See also*, Ethics Opinion RQO 09-20.

You have said that the employee's regular responsibilities are strictly ministerial and that he has no discretionary duties associated with the homeownership program. Additionally, the employee has been advised not to handle his own application file in any way. All tasks related to reviewing and approving or denying his application will be completed by supervisors and managers.

This procedure conforms to the requirements of the Ethics Code.

If you have additional questions, please feel free to contact me.

Sincerely,

VICTORIA FRIGO, STAFF ATTORNEY

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From: Brown, Clarence D. (PHCD)
Sent: Wednesday, November 09, 2011 2:48 PM
To: Frigo, Victoria (COE)
Subject: FW: County Employee Participating in County Homeownership Program

From: Brown, Clarence D. (PHCD)
Sent: Friday, October 21, 2011 12:35 PM
To: Ethics (COE)
Subject: County Employee Participating in County Homeownership Program

A County employee (HCD Technician), who provides administrative support, employed by the Public Housing and Community Development Department in the Homeownership Unit is seeking assistance for homeownership. The

employee has been advised not to work on the file and to have all tasks related to review and approval/denial be completed by supervisors and managers. Is this an acceptable practice and ethically sound?