

Frigo, Victoria (COE)

From: Ramos, Miriam S. (COE)
Sent: Thursday, September 27, 2012 2:37 PM
To: 'Del Amo, Gerald M'
Cc: Frigo, Victoria (COE); Centorino, Joseph (COE); Cedeno, Rachelle (COE)
Subject: INQ12-163
Attachments: INQ 12-79 Otero.pdf; INQ 12-97 Hoben.pdf

Gerald:

Given the fact that HAI is a JMH vendor and that you are traveling to Baltimore for the conference, you are prohibited from accepting the dinner invitation.

Sec. 2-11.1(w) of the Miami-Dade Conflict of Interest and Code of Ethics Ordinance states:

“...no...employee shall accept, directly or indirectly, any travel expenses including, but not limited to, transportation, lodging, meals, registration fees and incidentals from any County vendor...”

I have attached two prior ethics opinions, directly on point, for your review as well.

Sincerely,

Miriam S. Ramos, Esq.

Deputy General Counsel

Miami-Dade County Commission on Ethics

19 W. Flagler Street, #820
Miami, FL 33130
305-350-0656 direct dial
305-579-0273 fax
www.miamidadeethics.com

The Miami-Dade County Commission on Ethics & Public Trust is a public agency subject to Chapter 119, Florida Statutes, concerning public records. E-mail messages are covered under such law and thus subject to disclosure.

From: Del Amo, Gerald M [mailto:Gerald.Delamo@jhsmiami.org]
Sent: Thursday, September 27, 2012 12:48 PM
To: Ramos, Miriam S. (COE)
Subject: RE: AHLA Baltimore

That is correct. HAI is a current JHS vendor.

Gerald M. Del Amo, Esq.
Corporate Compliance Manager
Office of Compliance

Jackson Health System
1500 N.W. 12th Avenue, Suite 102
Miami, Florida 33136
Phone: 305-585-2941
Fax: 305-585-1909
gerald.delamo@jhs-miami.org

Compliance Hotline - 1.800.684.6457



From: Ramos, Miriam S. (COE) [<mailto:MSRAMOS@miamidade.gov>]
Sent: Thursday, September 27, 2012 12:47 PM
To: Del Amo, Gerald M
Subject: RE: AHLA Baltimore

Gerald:

It seems from your email that HAI is a current vendor for JMH. Please confirm that that is accurate.

Thank you,

Miriam S. Ramos, Esq.
Deputy General Counsel

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From: Del Amo, Gerald M [<mailto:Gerald.Delamo@jhs-miami.org>]
Sent: Thursday, September 27, 2012 12:04 PM
To: Ramos, Miriam S. (COE)
Subject: FW: AHLA Baltimore

Miriam:

Next week, I will be attending the American Health Lawyers' Association's annual Fraud & Compliance conference in Baltimore, Maryland. HAI, Jackson Health's Fair Market Value consultant, has invited me to a dinner on one of the nights. They are hosting the event and would be providing a meal.

Jackson Health's current gift policy (No. 329) reads as follows:

It is the policy of Jackson Health System (JHS) to prohibit employees from soliciting or demanding any gift. In addition, JHS prohibits any employee from accepting, soliciting or receiving any gift having a value of fifty dollars (\$50.00) or more from patients, relatives or friends of patients, or from firms or individuals doing business with or soliciting business from JHS.

I would be compliant with the JHS policy so long as the meal is not above the \$50 threshold, but I want to make sure I am also in compliance with the County's Ethics Code.

Can you please give me your opinion on this?

Thank you,
-Jerry

Gerald M. Del Amo, Esq.
Corporate Compliance Manager
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