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INQ 16-17 Moljo

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**From:** Diaz-Greco, Gilma M. (COE)  
**Sent:** Thursday, January 21, 2016 3:12 PM  
**To:** Moljo, Dorothy (ISD) <Dorothy@miamidade.gov>  
**Cc:** Centorino, Joseph (COE) <CENTORI@miamidade.gov>; Perez, Martha D. (COE) <perezmd@miamidade.gov>  
**Subject:** Dorothy Moljo, Personnel Specialist 2, Miami-Dade Internal Services Department ( Outside Employment) INQ 16-17

Dear Ms. Moljo:

You have inquired whether there is a maximum number of hours per week that a County employee may work in Outside Employment.

The Miami Dade Code at Section 2-11.1(j), prohibits conflicting outside employment. The Ethics Commission has opined that it would be a conflict of interest for an employee to use County time or resources in the performance of his or her outside employment, and that an employee cannot engage in outside employment that will create a conflict between his or her public duties and private interests. *See* Outside Employment Guidelines Memorandum (last amended in 2014), which is attached.

While no particular number of hours is specified under the County Ethics Code, the department Director, in reviewing the employee's request to engage in outside employment, must evaluate whether the number of hours a County employee will spend in his or her outside employment is likely to create a conflict, will affect the staffing requirements of the department, and/or is likely to affect that employee's performance of his or her public duties as a County employee. *See e.g.* RQO 12-11 (outside employment as private real estate agents is prohibited for Co. real estate officers because Co. real estate officers are granted a high level of autonomy to conduct Co. business, and it would be difficult to monitor the amount of time real estate officers spent on their private clients during the course of a Co. work day).

As a reminder, County employees that engage in outside employment are required to complete a Request For Outside Employment form and Outside Employment Statement on a yearly basis.

Please contact us if you have further questions.

Best regards,

Gilma (Mimi) Diaz-Greco  
Staff Attorney



Miami-Dade Commission on Ethics and Public Trust

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**From:** Moljo, Dorothy (ISD)  
**Sent:** Tuesday, January 19, 2016 10:48 AM  
**To:** Diaz-Greco, Gilma M. (COE) <[GDIAZGR@miamidade.gov](mailto:GDIAZGR@miamidade.gov)>  
**Cc:** Hall, Beverly (ISD) <[bhall@miamidade.gov](mailto:bhall@miamidade.gov)>; Bofill, Carmen (Elections) <[CBOFILL@miamidade.gov](mailto:CBOFILL@miamidade.gov)>  
**Subject:** Outside Employment

Good Morning Ms. Greco,

I am the liaison for Requests for Outside Employment for the Internal Services Department, and Carmen Bofill referred me to you for an answer to the following question asked by one of our managers:

- Is there a **maximum** number of weekly hours an employee may work in Outside Employment?

Please advise. Thank you.

*Dorothy* 😊

**Dorothy Moljo**, Personnel Specialist 2  
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