

Frigo, Victoria (COE)

From: Frigo, Victoria (COE)
Sent: Monday, July 15, 2013 4:41 PM
To: 'Jdelcueto@aol.com'
Cc: Centorino, Joseph (COE); Diaz-Greco, Gilma M. (COE)
Subject: Request for Opinion (INQ 13-173)

Mr. del Cueto,

The County Ethics Code at Sec. 2-11.1 (q) prohibits you, as a former member of the Financial Recovery Board of the Public Health Trust (PHT), *from lobbying the PHT or Jackson Health System (JHS)* for two years following your resignation from the Financial Recovery Board on February 11, 2013. The post-employment lobbying ban has been interpreted very expansively by the Ethics Commission to cover any activities intended to influence an official decision or official action by PHT or JHS personnel, regardless of whether the action will foreseeably be heard or reviewed by the Financial Recovery Board or by any PHT or JHS board or committee.

The County Ethics Code does not prohibit your company from contracting directly with medical schools to supervise medical students engaged in clinical education at hospitals, including JHS facilities. We understand that your remuneration will come only through your contracts with the medical schools.

Additionally, the two-year lobbying ban does not prohibit you from interacting with PHT or JHS personnel as long as you do not seek to influence them to take any official action on behalf of your company or the medical schools your company contracts with.

If you have additional questions at any time in this process, please feel free to contact me.

Sincerely,

VICTORIA FRIGO, SENIOR STAFF ATTORNEY

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From: JOAQUIN J DELCUETO [<mailto:jdelcueto@aol.com>]
Sent: Thursday, July 11, 2013 7:59 AM
To: Ethics (COE)
Subject: Request for Opinion

July 11th, 2013

Joseph M. Centorino
Executive Director
Commission on Ethics &
Public Trust

Dear Mr. Centorino:

Jackson Health System has Affiliation Agreements with many medical schools whose students are allowed to participate in clinical rotations at many of the JHS facilities. Some of these students who are currently undergoing clinical rotations are third and fourth year medical students from offshore medical schools. A third party company comprised of individuals with a proven track record is required to manage and supervise these medical students. Such oversight is crucial to ensure that students continue to fulfill their medical school's curriculum requirements, including the necessary didactics component of their education and clinical rotations.

As a former member of the Financial Recovery Board, having resigned my position on February 11, 2013, I request a ruling from the Commission on Ethics as to the appropriateness of my company being hired by these schools to provide such services to them. Though remuneration would come directly from the schools, some of these students would obviously be rotating through JHS facilities. Would this or any other related business contact with JHS regarding these students violate any of the rules within The Conflict of Interest and Code of Ethics Ordinance?

Please, feel free to contact me should you have any questions or require any additional information.

Kind Regards,

Joaquin del Cueto
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Miami, FL 33173
Jdelcueto@aol.com