

Ethics Disclosures and Conflicts of Interest for Multnomah County Volunteers



What are potential conflicts of interest? Why do I have to disclose?

Potential conflicts of interest are ways that you, as a volunteer in your activities as a volunteer, may be able to influence decisions or actions by the County that could financially benefit you or specific people close to you (certain relatives, household members, etc) or businesses you are associated with.

Rule:

- (1) A conflict of interest arises when **your action or decision or recommendation could or would** have the effect of **private financial gain or avoidance of loss**
- (2) If you believe you may have a conflict of interest, you must address the conflict before taking any action.

If you are a voting member of a Board or Commission:

- ❖ You must announce **publicly** the nature of the conflict **before** any action is taken.
- ❖ Depending on the type of conflict, you may not be able to participate as a public official in discussion or vote on the issue.

If you are volunteer:

- ❖ You must notify the County, in writing, of the nature of the conflict and the matter will be addressed as required by law.

By volunteering at a government agency you are committing to a high level of transparency that isn't common in other volunteer positions - filling out an ethics form will help you and County staff who work with you ensure that you do not run afoul of ethics rules and accidentally use your volunteer role to financially benefit yourself, your household and family, a business with which you are associated - the same as all other County staff, interns, and volunteers.

Where can I learn more?

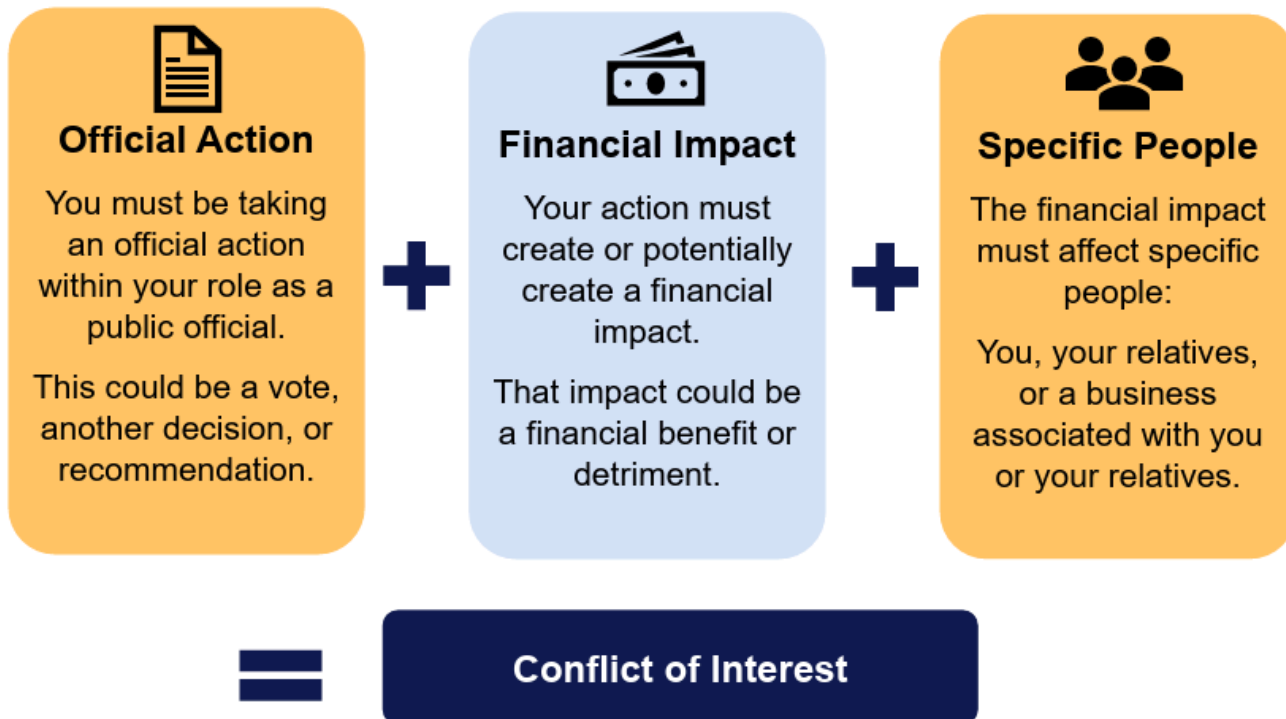
This practice comes from legal requirements for both Multnomah County and the State of Oregon. All volunteers are required to review the rules:

- [Multnomah County Rule 3-30 Ethics](#)
- [Oregon Chapter 244 — Government Ethics](#)
- [“A Guide for Public Officials” Ethics manual](#)
- [Oregon Government Ethics Commission Training Resources](#)

Basics about identifying and disclosing conflicts, from the [State of Oregon Conflict of Interest Flowchart](#):

Identifying Conflicts of Interest

For something to be a conflict of interest underneath Oregon Government Ethics Law, it must meet three criteria [ORS 244.020(1) & (13)]:



Once you've recognized that something meets these criteria and is a conflict of interest, you need to further analyze if it is an **actual conflict of interest** or **potential conflict of interest**.

Actual Conflict of Interest

The financial impact of your action is certain.

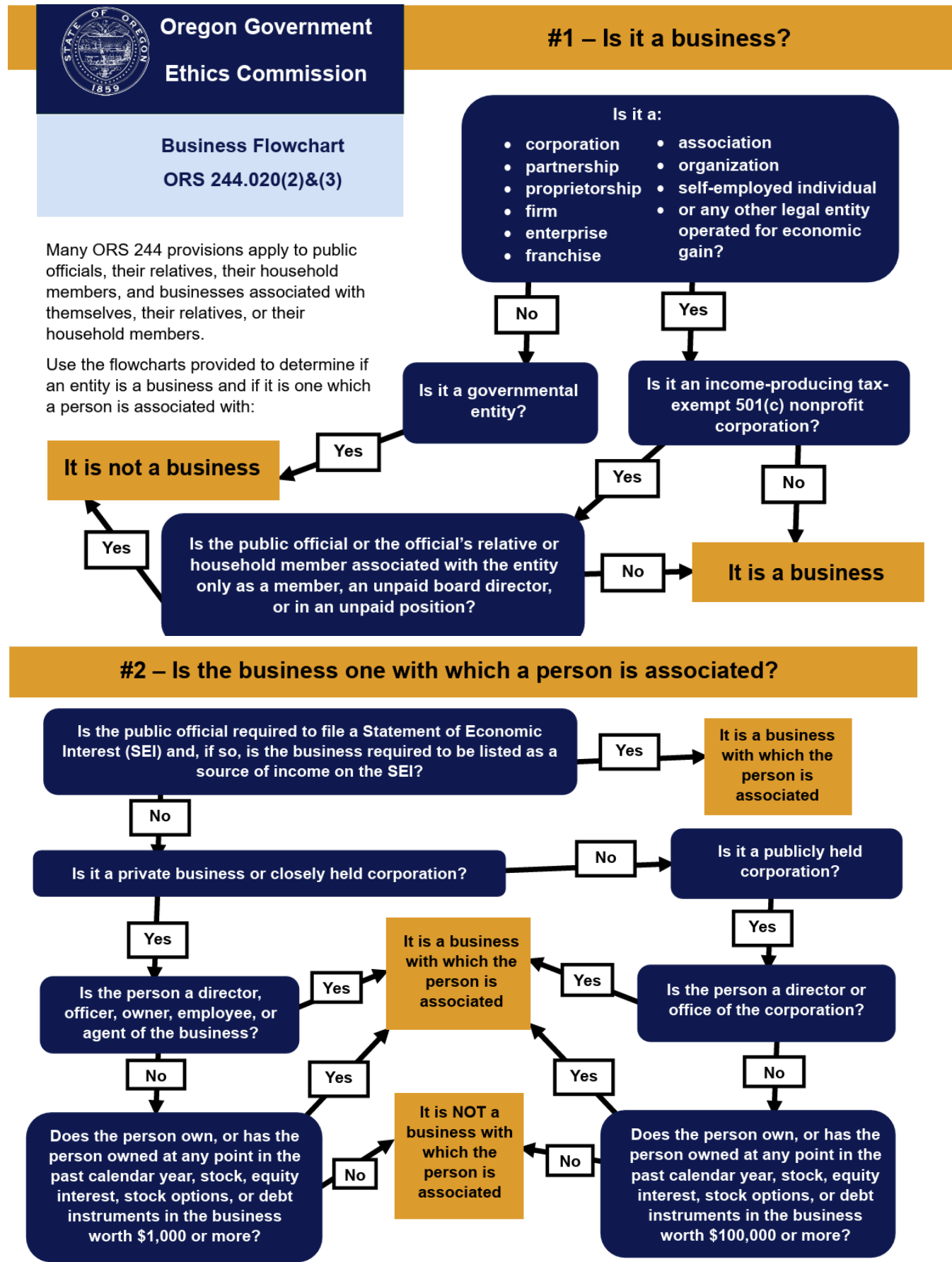
For example, you process business permits as part of your public official duties. Your in-laws apply for a permit. You processing their permit would have a certain financial impact; therefore it is an actual conflict of interest.

Potential Conflict of Interest

The financial impact of your action is possible, but not certain.

For example, you are voting on requirements for future city contracts. Your sibling owns a business that could apply for a future city contract. The financial impact is possible, but not certain; therefore it is a potential conflict of interest.

Conflicts relate to the volunteer, household members, relatives and businesses
 Use [this chart from the Oregon Ethics Commission](#) to determine if something is a business.



Frequently Asked Questions for Conflicts of Interest at Multnomah County

Q. Where do I make these disclosures?

- A. At the beginning of your volunteer term, and annually after that, you will be asked to complete an ethics disclosure form. If a conflict comes up in a meeting or other official activity, you must announce publicly the nature of the conflict *before* any action, such as a discussion or a vote, is taken.

Q. What happens if there is a potential or actual conflict of interest?

- A. Your County staff supervisor (usually a volunteer coordinator, advisory group staff, or similar) will review your conflict form and flag any possible courses of action, if any. If there is a potential conflict they will meet with you and share some options. Depending on the situation, you may have to:
 - 1. State the conflict in conversation, if/when the related issue comes up
 - 2. Disclose a conflict or potential conflict in a recommendation letter or report that relates to the conflict
 - 3. Recuse yourself from a vote or final decision
 - 4. Recuse yourself from a debate or deliberation (as well as vote)
 - 5. Leave a role (for example: being a county employee on most advisory committees, being on a procurement committee when your employer has applied for the funding, etc.).

Because your ethics are individual to you, you should also consider calling the Ethics Commission to discuss possible conflicts or ethical concerns. The [“A Guide for Public Officials” Ethics manual](#) provides contact information for the Ethics Commission.

Q. How should I report a concern about another government official’s conflict?

- A. If you think you or a colleague may have a conflict of interest, consider discussing your concerns directly. If a violation has already occurred, or direct communications were not successful, you can report a potential conflict to:
 - 1. Your Volunteer Coordinator
 - 2. A Program manager;
 - 3. Department Human Resources Manager (see below for volunteer ethics contact);
 - 4. Multnomah County Chief Human Resources Officer (CHRO);
 - 5. Multnomah County Auditor;
 - 6. Multnomah County Good Government Hotline; or
 - 7. State Code of Ethics (ORS Chapter 244) to the Oregon Government Ethics Commission.

Q. What happens if I am the subject of an alleged ethics concern like a non-disclosed conflict?

- A. If you are subject to a conflict of interest concern, your volunteer coordinator or manager will reach out to you to discuss the potential conflict and how to address it. It is possible that the issue is a misunderstanding, miscommunication, or confusion that requires no or minimal action. However, volunteers who engage in actions that violate these rules about conflicts and disclosures are subject to disciplinary action, up to and including dismissal, and action by the Ethics Commission.

Q. I don’t make any decisions in my volunteer role, do I still have to disclose conflicts?

- A. Even if you don’t expect to make decisions or be in conversations about decisions while volunteering at Multnomah County, there is always the possibility you could be consulted by decision makers. Ethics disclosures are required for all volunteers, interns and employees regardless of position.

Q. How much detail do I need to include in my disclosure form?

- A. The purpose of the disclosure form is to begin a conversation between you and the County to discuss ethical concerns. Include enough information to begin that conversation, and understand that additional information may be requested by the County or Ethics Commission to determine the appropriate course of action.

Q. Who are considered relatives or household members for conflicts of interest?

- A. From ORS 244.020(16): “Relative” means: The spouse, parent, stepparent, child, sibling, stepsibling, son-in-law or daughter-in-law of the public official...; The parent, stepparent, child, sibling, stepsibling, son-in-law or daughter-in-law of the spouse of the public official...; Any individual for whom the public official...has a legal support obligation; Any individual for whom the public official provides benefits arising from the public official’s public employment or from whom the public official receives benefits arising from that individual’s employment
- a. (11) “Member of the household” means any person who resides with the public official

Q. What if I have a job, income source, or other associations that are sensitive and/or I am not comfortable disclosing in a government form?

- A. You can provide as much information on the disclosure form as reasonably possible, and make a request for further discussion of supporting details. Depending on your particular circumstances, additional information may be needed, or consultation with the Ethics Commission may be advised.

Q. Does the conflict analysis apply if I receive financial support from a Multnomah County service or program, like being in an eviction prevention program?

- A. A volunteer may have a conflict if their recommendation would or could affect the financial interest of the official, their relative, or a business with which they or their relative is associated. Financial interests could include payments or financial assistance received as a client of county programs, potentially including but not limited to: rent assistance, rehousing assistance, childcare payments, stipends for volunteerism, or direct cash assistance, as well as other financial benefits. If you’re not sure if you have a financial interest please contact the HR or ethics commission contacts below.

Q. What happens if my circumstances change during the year and after I’ve submitted the form?

- A. You can fill out a new ethics disclosure form whenever circumstances change. Ask your volunteer coordinator for a form.

Q: Are members of the Community Budget Advisory Committees subject to any different rules from other County volunteers?

- A. Yes. Section 3.303 of the County Code states that any member of a CBAC who has monetary or investment interest in any matter before their CBAC will provide written notification to their CBAC Coordinator and it will be shared with the Office of Community Involvement (“OCI”) and the Board of County Commissioners.

Q. Who should I contact if I have additional questions or concerns?

1. Initial questions can always be directed to your volunteer coordinator
2. For additional questions specific to conflicts in your role at Multnomah County please contact Multnomah County HR, Norman Ross, and cc your volunteer coordinator:
norman.ross@multco.us
3. For general questions or concerns, contact the Oregon Ethics Commission: Email mail@ogec.oregon.gov or call 503-378-5105