

Ethics Disclosures and Conflicts of Interest for Multnomah County Volunteers



A County volunteer is met with a conflict of interest when participating in official action which would or could result in a financial benefit or detriment to the volunteer, a relative, or a business with which either is associated.

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:

- a. **Actual conflict of interest:** when a volunteer participates in an official action, decision, or recommendation that **would** affect the financial interest of the official, their relative, or business with which they or their relative is associated.
- b. **Potential conflict of interest:** when a volunteer participates in an official action, decision, or recommendation that **could** affect the financial interest of the official, their relative, or a business with which they or their relative is associated.

(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 (ex: CBAC and _____):

- ❖ 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.
- ❖ For CBAC/Central CBAC: 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 OCI and the Board of County Commissioners.

If you are volunteer (ex: CIC and interns):

- ❖ 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 Multnomah County 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 or a family members are associated - the same as all other County staff, interns, and volunteers.

Where can I learn more?

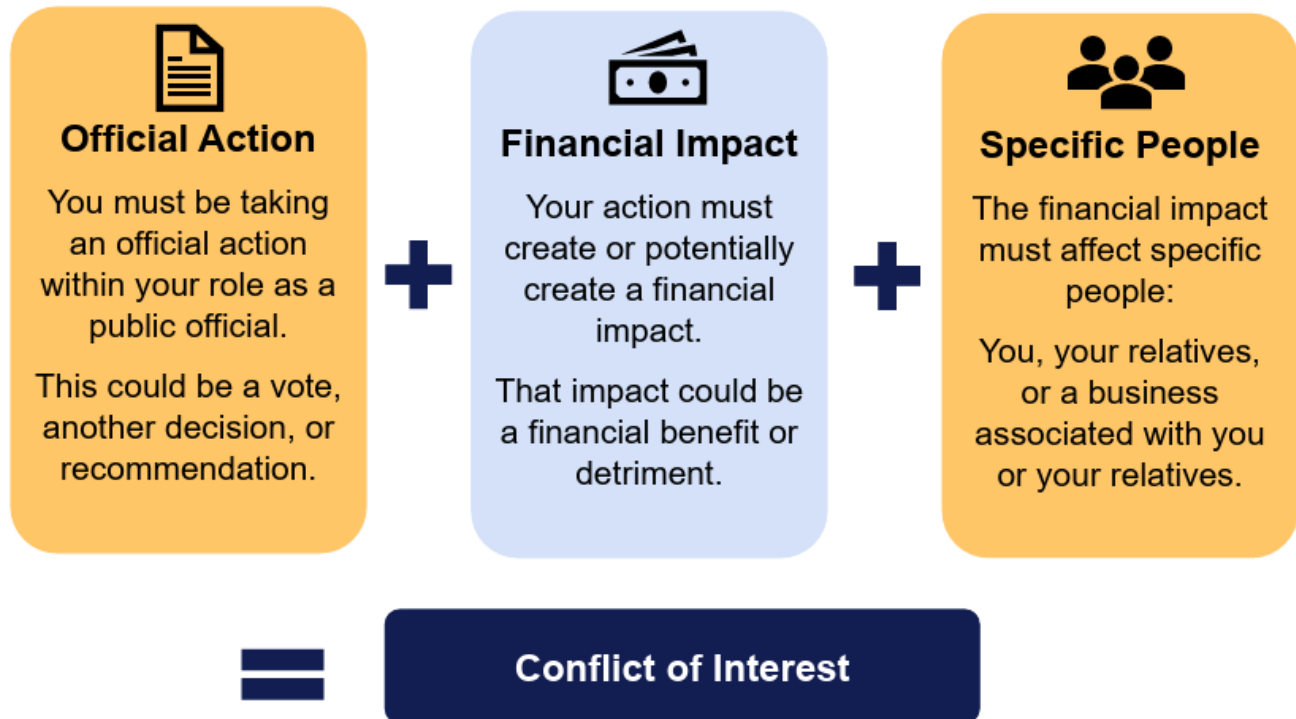
This practice comes from legal requirements for both Multnomah County and the State of Oregon. All volunteers are required to review the rules:

- [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 may relate to the volunteer, household members, relatives and businesses. [These charts may be helpful.](#)

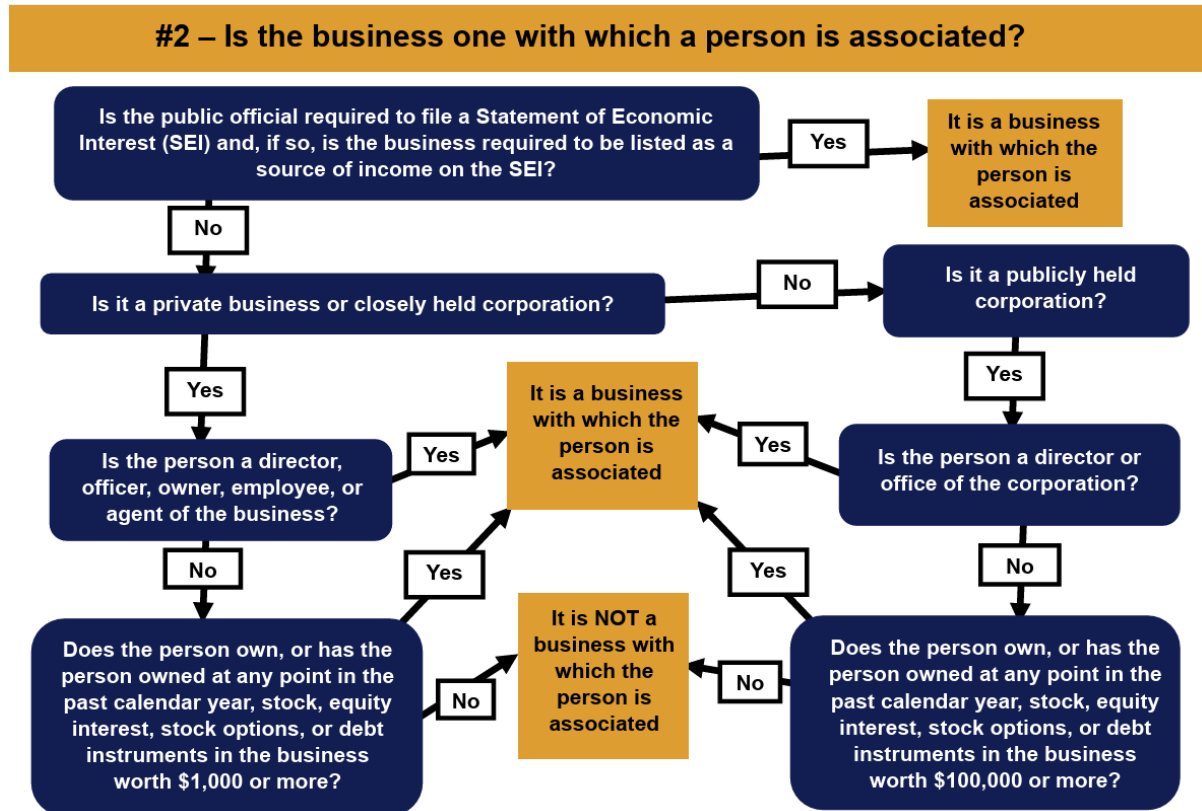
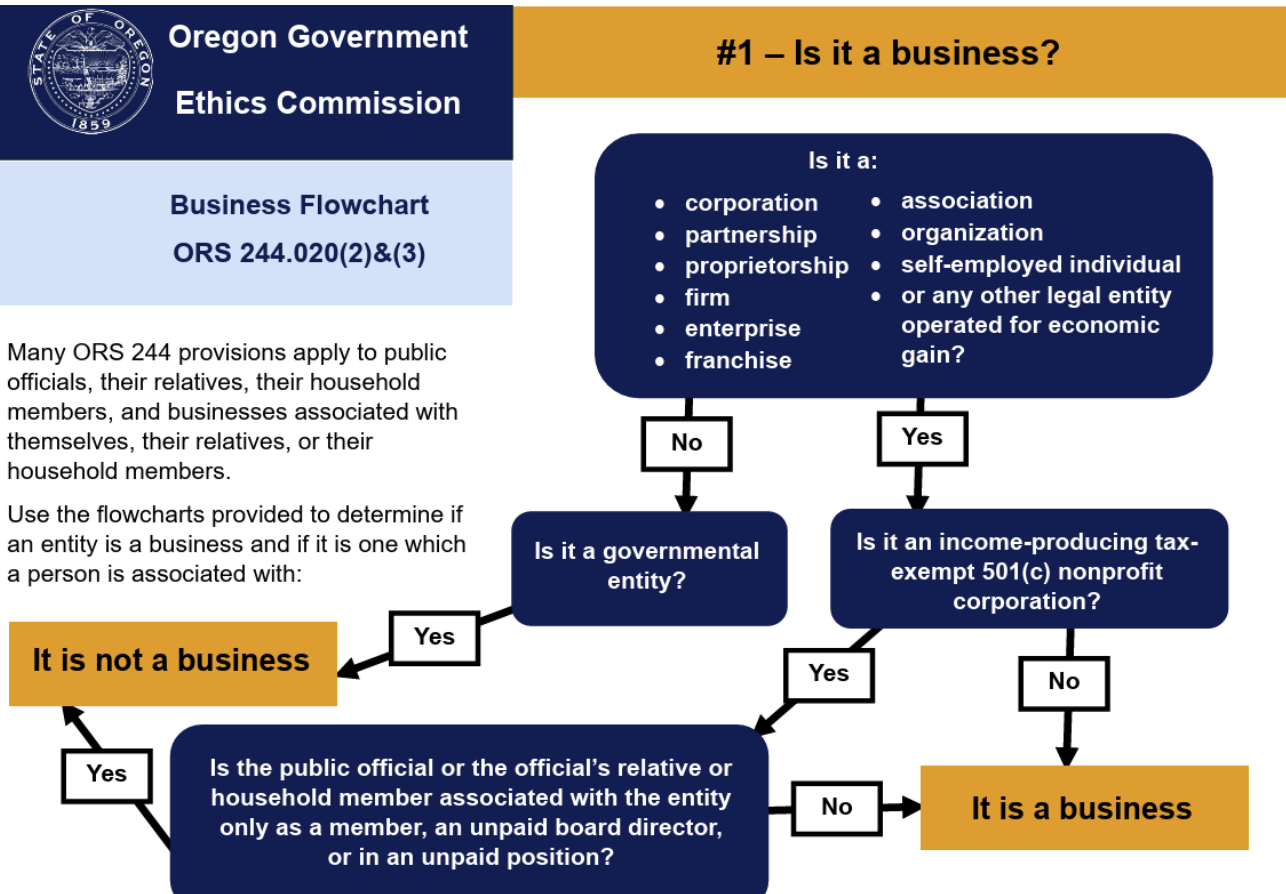


Oregon Government Ethics Commission

Business Flowchart ORS 244.020(2)&(3)

Many ORS 244 provisions apply to public officials, their relatives, their household members, and businesses associated with themselves, their relatives, or their household members.

Use the flowcharts provided to determine if an entity is a business and if it is one which a person is associated with:



Frequently Asked Questions for Conflicts of Interest at Multnomah County

#1: 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 or disclose in writing the nature of the conflict *before* any action, such as a discussion or a vote, is taken. (See FAQ #2).

Q. What if I am met with a potential or actual conflict of interest?

A: The required action depends on if you are serving on an advisory board. Although there are exceptions and exemptions, in general:

1. Volunteers (OCI, etc.): Must provide **written notice** to a volunteer coordinator. The notice must describe the nature of the conflict. The volunteer coordinator will either designate an alternate person to handle the matter or direct the volunteer in how to dispose of the matter.
2. Volunteer Members of advisory boards (CBAC, Central CBAC, ____ etc): You must publicly announce the nature of the conflict of interest before participating in any action or discussion. The announcement must be made in a public meeting, or if no public meeting is available, by other means reasonably determined to notify members of the public of the disclosure.
 - a. Potential Conflict of Interest: Following the public announcement the official may discuss and vote on the issue that gave rise to the conflict of interest.
 - b. Actual Conflict of Interest: Following the public announcement the public official must refrain from further discussion and participation on the issue that gives rise to the conflict of interest.
3. For CBAC and Central CBAC members: [Section 3.303](#) of the County Code also 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.

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. Yes. 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 explain the nature of the conflict and begin a conversation between you and the County to discuss ethical concerns. 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:
- a. "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
 - b. "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 should 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 written 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 should fill out a new ethics disclosure form whenever circumstances change, and make any required disclosures as required as conflicts come up- see FAQ #1. 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 your volunteer coordinator:
- 3. For general questions or concerns, contact the Oregon Ethics Commission: Email mail@ogec.oregon.gov or call 503-378-5105