San Juan County
Public Hospital District One

Caring. Healing. Serving.

**PUBLIC HOSPITAL DISTRICT NO. 1 OF SAN JUAN COUNTY, WASHINGTON**

**BOARD OF COMMISSIONERS**

# CODE OF ETHICS

Established on 30 July 2014[1]
Approved by SJCPHD#1 Board on 19 November 2014

## Prologue

Per RCW 43.160.040, all Public Hospital District Boards must have a code of ethics to guide its members, to "protect the state and its citizens from any unethical conduct by the board."[2]

Lindsay Bayer wrote, "Businesses and nonprofit organizations are responsible for developing and implementing principles that guide employee conduct and aid in organizational decision making and policy development. Because these are all moral issues it is important for these organizations to develop and implement ethical codes or statements. In doing so, the leadership will aid in developing an ethically competent organizational culture with consistent ethical business practices."[3]

Therefore, since legal and practical needs mandate a moral framework for ethical governance, the following comprises San Juan County Public Hospital District #1's Code of Ethics.

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[1] This document's author gratefully acknowledges the substantial textual contribution of King County Public Hospital District No. 1.

[2] RCW 43.160.040, Conflicts of interest — Code of ethics: "In addition to other applicable provisions of law pertaining to conflicts of interest of public officials, no board member, appointive or otherwise, may participate in any decision on any board contract in which the board member has any interests, direct or indirect, with any firm, partnership, corporation, or association which would be the recipient of any aid under this chapter. In any instance where the participation occurs, the board shall void the transaction, and the involved member shall be subject to whatever further sanctions may be provided by law. *The board shall frame and adopt a code of ethics for its members*, which shall be designed to protect the state and its citizens from any unethical conduct by the board (emphasis by this document's author).
[1982 1st ex.s. c 40 § 4.]"

[3] http://www.ehow.com/how_5974791_create-ethical-statement.html, 27 June 2014

## I. Introduction

This Code of Ethics ("Code") has been adopted by the Board of Commissioners (the "Board") of Public Hospital District No. 1 of San Juan County, Washington (the "District") to promote honest and ethical conduct and compliance with applicable laws, rules and regulations by the members of the Board (the "Commissioners").

## II. Applicability

This Code applies to each Commissioner.

## III. Using the Code

This Code is a general guide to the Board's standards of conduct and regulatory compliance. This Code is not intended to cover every issue or situation Commissioners may face in their official capacity. This Code does not replace other more detailed policies and procedures adopted by the District, including but not limited to any District Bylaws or specific directives adopted from time to time by the Board.

It is essential that Commissioners thoroughly review this Code and commit to uphold its requirements. Failure to read and/or acknowledge this Code does not exempt Commissioners from their responsibility to comply with this Code, applicable laws, rules and regulations, and District policies and procedures.

Principles and practices outlined in this Code are not intended to restrict Commissioners from exercising their constitutional rights of free speech, and should not be so construed. Furthermore, the exercise of such rights shall not subject any Commissioner to any sanctions under this Code, even if such exercise is otherwise inconsistent with a stated principle or practice of appropriate ethical conduct.

The Board does not intend to adopt any rule in this Code that violates existing law. If any provision of the Code subsequently violates any law, as a result of changes in the law or otherwise, that Code provision shall be considered to be void.

## IV. Fundamental Responsibilities of Commissioners

Each Commissioner is responsible to promote the best interests of the public by overseeing the management of the District's business and community operations, including San Juan Island EMS and Medevac. In doing so, each Commissioner shall act in accordance with this Code, the District's other policies and procedures, and applicable laws, rules and regulations, including, but not limited to, Washington state law and any extant District Bylaws. The Commissioners acknowledge that the purpose of Chapter 70.44 RCW is to establish public hospital districts, and to allow those districts to own and operate hospitals, and other health care facilities, and to provide hospital and other health care services for the residents of such districts and other persons.

The discharge of this responsibility requires the District to operate its hospital and other health care facilities in a competitive manner. Were it not to do so, the District could not compete with other private and public health care providers for patients, medical staff, executives and other critical operational support and would cease to be an economically viable entity--notwithstanding the public

support provided through tax levies against real property located within the District's boundaries.

## V. Principles and Practices

**A.** In the performance of their official duties, Commissioners shall act ethically, in good faith, with integrity, with care, and in a manner they reasonably believe to be in the best interests of the public that is served by the District.

**B.** Commissioners shall not allow outside activities or personal financial or other interests to influence or appear to influence their ability to make objective decisions with respect to the District.

**C.** Commissioners shall conduct their official and personal affairs in such a manner as to give the clear impression that they cannot be improperly influenced in the performance of their official duties.

**D.** Commissioners in discharging their duties to the District shall do their best to comply with all applicable laws, rules and regulations of federal, state and local governments and other regulatory agencies.

**E.** Commissioners shall not be beneficially interested, directly or indirectly, in any contract or transaction made by the Board, in whole or in part, or that may be made for the benefit of their office, or accept, directly or indirectly, any compensation, gratuity or reward in connection with such contract or transaction from any other person beneficially interested therein, except to the extent permitted under applicable law. Should a Commissioner have a beneficial interest in any contract or transaction proposed for the District, such beneficial interest shall be disclosed to the Board, before the Board authorizes the District to enter into such contract or transaction. The existence of such conflict of interest shall be reflected in the official minutes of the Board. Any Commissioner having such a conflict of interest shall not vote when the matter is presented to the Board for approval. Moreover, such Commissioner shall not influence or attempt to influence any other Commissioner to enter into a contract or transaction in which such Commissioner has a beneficial interest.

**F.** At the time of a Commissioner's election, a Commissioner shall disclose in writing to the Board all personal or professional relationships that create, or have the appearance of creating, a conflict of interest with the District. Should any such personal or professional relationships arise in the future, the Commissioner shall promptly disclose such relationships to the Board.

**G.** Commissioners shall not use their position to secure special privileges or exemptions for themselves or others.

**H.** Commissioners may not, directly or indirectly, give or receive or agree to give or receive any compensation, gift, reward, or gratuity from a third *party for the Commissioners' services to the District* or as to any contract or transaction between the District and any other party.

**I.** Commissioners shall not receive any gifts, compensation, remuneration, payments or distributions from the District for their services as Commissioners, except as and only to the extent permitted by applicable law.

**J.** Commissioners shall not accept employment or engage in any business or professional activity that could reasonably be expected to place them in a conflict of interest with the District or require

or induce them, by reason of their new employment or engagement, to disclose confidential information acquired by the Commissioners by the reason of their office.

**K.** If Commissioners obtain confidential information by reason of their office, they will not disclose such confidential information to others unless authorized to do so by the Board. Here, "confidential information" means information that the Commissioners are required to treat as confidential under applicable law (whether such law is derived from statutes, regulations, case law, the District's charter documents, or otherwise). Information regarding the District not deemed confidential under applicable law may be shared by the Commissioners with others.

**L.** If Commissioners receive frequent inquiries from individuals or other persons requesting the disclosure of confidential information, Commissioners shall bring that information to the attention of the other Commissioners, so the Board may determine if it wishes to adopt preventive measures to further protect the Board and District's legitimate interest in controlling access to its confidential information.

**M.** Commissioners shall not simultaneously hold any other incompatible office or position, including, but not limited to, another office or position (i) whose functions are inconsistent with the functions of a Commissioner for the District, or (ii) where the occupation of such other office or position is detrimental to the public interest. For example, Commissioners who are EMTs must recuse themselves from votes concerning EMT activities.

**N.** Commissioners shall comply with all of the District's policies and procedures, including those applicable to District employees, if any, that are germane to their service as Commissioners.

**O.** The Superintendent is, by statute, the District's chief administrative officer and, in such capacity, is responsible for the administration of the District. Accordingly, if Commissioners receive questions or concerns from employees, if any, or from the public concerning District operations, they shall promptly notify the Superintendent. It shall be the responsibility of the Superintendent (or the Superintendent's designee) to respond on behalf of the District. Similarly, if third parties, such as third party payers, employee groups, real estate developers, or others, communicate with Commissioners regarding existing or proposed business or other relationships with the District, such matters shall be referred promptly to the Superintendent for whatever action the Superintendent deems appropriate. The Superintendent shall be accountable to the full Board for follow-up on such items.

**P.** Commissioners shall fully cooperate with government investigators as required by applicable law. If a Commissioner encounters an investigator, or receives a subpoena, search warrant or other similar document, related to an investigation of the District, the Commissioner shall promptly notify the Board's Chairperson and Superintendent.

**Q.** Commissioners shall not destroy or alter any information or documents in anticipation of, or in response to, a request for documents by any applicable governmental agency or from a court of competent jurisdiction.

**R.** The Commissioners are expected to prepare for, participate in, and attend all Board meetings. They should commit the time necessary to review all Board materials. The same level of participation is expected with respect to all Board committees, if any, to which the Commissioners are assigned. For purposes of the foregoing, "attend" shall mean that the Commissioner arrives at the Board

meeting (or, if applicable, the Board committee meeting) on time and stays until the conclusion of the meeting.

**S.** Commissioners are expected to engage in robust, active discussions of the issues submitted to the Board for consideration, in order to arrive at the most carefully considered decisions for the District. With this in mind, Commissioners must study all relevant information (including materials in Board packages), articulate clearly their personal views, be prepared to argue for and support their positions, and, when appropriate, question and challenge the views of others. Such deliberations should be conducted in a respectful manner in line with customary standards of civility and decorum.

**T.** Commissioners. when discussing District business, whether at Board meetings or elsewhere, are urged to adhere to the following standards: Commissioners should (i) be respectful of the views of other Commissioners and executives, even if such views are contrary to the Commissioners' personal opinions; (ii) not divulge confidential information regarding the District's affairs; (iii) not purport to represent the views of the Board, unless authorized to do so by the Board; and (iv) not intentionally misrepresent, demean or belittle positions taken by other Commissioners or District executives and, where appropriate, take all reasonable steps to ensure that a balanced presentation of competing points of view is given so as to promote common understanding of (rather than to foster a spirit of divisiveness with respect to) the issues before the Board and the various competing points of view taken by other Commissioners and District executives. Nothing in this Code is intended to limit any Commissioner's constitutionally-protected rights of free speech, nor is this Code to be construed so as to impair the ability of Commissioners to participate in ceremonial, representational or informational functions in the pursuit of their official duties.

**U.** Commissioners are publicly-elected officials. As a consequence, if incumbent Commissioners choose to run for re-election, they will of necessity be involved in campaign-related activities during the tenure of their service on the Board. Nothing in this Code of Ethics is intended to deprive such individuals of, or to inhibit or limit the lawful exercise of, the right to engage in customary re-election activities, including but not limited to seeking and securing endorsements, soliciting campaign contributions, distributing voter pamphlets and other campaign related materials, or making public appearances. They may solicit financial or other support from the community at large, hospital employees, medical staff members, nurses, and others, provided that the support comes from such persons when acting in their personal capacities, and not as representatives or employees of the District. All such support must be voluntary and may not be given or received with the expectation or understanding that the contributing individual will receive any consideration, privilege or benefit, directly or indirectly, from the District. Commissioners may not, claim, suggest or create the impression that their re-election is supported or endorsed by the District itself, nor may they use or gain access to the District financial resources to support their re-election campaign. They may however fully discharge their duties and responsibilities as Commissioners during the re-election campaign (as indeed they are obligated to do), and such activities are not wrongful.

**V.** Commissioners shall refrain from any illegal, unethical, or inappropriate conduct, whether or not specifically identified in this Code, and as seen or identified by the majority of fellow Commissioners.

## VI. General Standards of Conduct

Commissioners' compliance with the principles and practices of this Code will be subject to the following guidelines:

**A.** Commissioners will not be considered in violation of the ethical guidelines of the Code as long as they have acted in good faith, and in a manner they believed to be consistent with their obligations under the Code.

**B.** To the extent that Commissioners receive advice from the District's legal counsel (consisting of in-house counsel or legal counsel engaged by the District), Commissioners may rely upon such advice in discharging their duties to the District. If Commissioners have in good faith relied upon such advice in conducting the District's business, such reliance will constitute a defense to charges that actions based upon such reliance violated the provisions of the Code.

**C.** Absent evidence of bad faith, inadvertent violations of the Code that do not adversely affect the District in a material way and that do not create private benefits in favor of the Commissioner or related parties will not constitute grounds for disciplining a Commissioner.

## VII. Enforcement of Code

The Board is the body vested with the exclusive authority to enforce the provisions of the Code and to take disciplinary action against Commissioners for violations. As provided in Article VIII, the Board may, under certain circumstances, enlist the support of others to assist with fact finding and to make recommendations.

While members of the public may give the Board notice of alleged violations of the Code, they may not, except as qualified below, bring legal actions against Commissioners for alleged violations, whether such actions seek specific performance, damages or other forms of judicial relief. The Commissioners are not liable to members of the public for damages resulting for Code violations.

Notwithstanding the foregoing, if a Commissioner's misconduct constitutes official misconduct as to which a legal action may be brought by a member of the public, separate and apart from its constituting a violation of the Code, members of the public may pursue such matters, at law or in equity, in the same manner as they might otherwise have pursued such matters under then-existing law. Hence, as relates to members of the public, the Code does not, and is not intended to create, a basis for making claims or pursuing remedies that would not otherwise be available under existing law.

## VIII. Reporting Procedures and Process

**A.** Any individual may advise the Board of an alleged violation of the Code by a Commissioner. To the extent feasible, any such notice should be given in writing and specify in reasonable detail the alleged misconduct.

**B.** The District will not take retribution or disciplinary action against any District employee who raises concerns or reports potential violations of the Code by a Commissioner, whether or not it is subsequently determined that there is a legal or factual basis to support such allegations. On the other hand, should members of the public allege official misconduct by Commissioners, and should such allegations not be supported either for factual or legal reasons, Commissioners may pursue such remedies

as are available, at law or in equity, including but not limited to claims for libel or slander, against the parties wrongfully accusing the Commissioners of misconduct.

**C.** The Board shall review promptly, and in a prudent manner, allegations of Commissioner misconduct to determine whether there have been violations of the Code and what disciplinary action, if any, is appropriate. The processing of such allegations shall be under the direction of the Board's Chairperson, acting with the advice of counsel, and being subject to the other guidelines provided for in this Article VIII. If the Board's Chairperson is the subject of alleged misconduct, the responsibilities vested in the Board's Chairperson under the Code will pass to the next ranking officer (or, if none, the senior most member) of the Board who is not accused of the alleged Code violations.

**D.** The Board shall, from time to time, adopt procedures for investigating, handling, and resolving allegations of misconduct, subject to adopting reasonable procedures for:

(i) gathering information regarding the alleged misconduct, including but not limited to, accepting written submissions, hearing testimony, conducting hearings, undertake fact finding, and soliciting information from experts;

(ii) the right of the accused to respond to the allegations and to be represented by counsel;

(iii) the screening out of frivolous complaints; and

(iv) the right of the public to observe such proceedings under the Open Public Meeting Act ("OPMA").

**E.** If the Board determines that a Commissioner has violated one or more of the provisions of the Code, the Board may give written or oral warnings, issue formal reprimands, or publicly censure the Commissioner for violating the Code. Such disciplinary action shall be recorded in the minutes of the Board's meetings and, as directed by the Board, be published in local newspapers, the District's communications with residents, or through other media. In those instances where the misconduct is of a serious nature, the Board may, after receiving legal advice from counsel, initiate legal action in a court of competent jurisdiction to remove such Commissioner from office.

**F.** Subject to the following guidelines, the Board may appoint one or more individuals to assist in fact-finding and/or make recommendations to the Board regarding allegations of Commissioner misconduct:

(i) It will be left to the discretion of the Board to determine whether such a panel should be convened and to determine the scope of the responsibility given to such panel. The Board shall consider all facts and circumstances in making such determinations, including but not limited to the seriousness of the allegations, the history of the alleged misconduct – whether constituting an isolated incident or pattern of misconduct, the publicity surrounding the activities, the level of public interest, and whether and to what extent the public's interest might be advanced by enlisting the support of others outside of the Board. The Board's determinations regarding such matters will be final and binding. It is not expected that such panels would be convened to handle frivolous complaints or allegations regarding inadvertent or minor violations of the Code.

(ii) If the Board elects to solicit outside support in processing allegations of Code violations, the Board's Chairperson, acting with the advice of legal counsel, shall appoint, on such basis as the Board's Chairperson deems appropriate, the individuals to serve on the advisory panel, which participants may be drawn from public officials or members of the local business community (such as members of the chambers of commerce) from those municipalities whose geographic boundaries fall primarily within the boundaries of the District. The size of the panel will be determined by the Board's Chairperson.

(iii) The Board or, absent specific direction from the Board, the Board's Chairperson will establish the specific fact-finding and advisory responsibilities of the panel.

(iv) If such a panel is constituted, the panel's activities will be subject to the public access requirements of the OPMA, to the extent required by OPMA.

(v) The Board will, however, in all instances, retain ultimate decision making regarding whether the alleged misconduct constitutes a violation of the Code and whether, and to what extent, to take disciplinary action against any Commissioner found to be in violation of the Code.

**G.** To the extent that alleged misconduct constitutes a violation of law, separate and apart from a violation of the Code, such misconduct may be referred to the county prosecuting attorney for action.

## IX. Waiver

If a Commissioner believes that it is inappropriate to apply any of the provisions of this Code to such Commissioner, such Commissioner may submit to the Board a written request for a waiver from such provision. Such written request must be accompanied by a statement setting forth the reasons why the waiver should be granted under the circumstances. Such waiver shall be effective if approved by a majority vote of the Commissioners (excluding the requesting Commissioner). Furthermore, such waiver may be granted only if supported by legal advice from the District's in-house or outside legal advisors.

## X. Review

The Board shall review this Code within six months of its initial adoption and thereafter on an annual basis, to ensure compliance with all applicable laws, rules and regulations, and to ensure that the Commissioners are held to the highest standards of conduct and ethics. In connection with such review, the Board should discuss what, if any, amendments or revisions are necessary to improve the effectiveness of this Code.

## XI. Amendments

This Code may be amended from time to time by the Board, if approved by a majority vote of all Commissioners, and any amendment must be disclosed as required by and in accordance with applicable laws, rules and regulations.

## XII. Affirmation

Each Commissioner is responsible for reviewing, understanding, acknowledging and personally upholding this Code, and for familiarizing him or herself with the applicable detailed elements of the District's Corporate Compliance Plan and other policies and procedures. Each of the Commissioners shall certify that he or she has read, understands, is in compliance with, and is not aware of any violations of this Code (i) upon the initial adoption of this Code; (ii) upon the adoption of any amendments to this Code; (iii) upon a Commissioner's election or re-election to office; and (iv) at the beginning of each fiscal year. Each such certification shall be made by the execution of the Receipt and Acknowledgement attached hereto as **Exhibit A.**

**EXHIBIT A**

**PUBLIC HOSPITAL NO. 1 OF SAN JUAN COUNTY, WASHINGTON**

**BOARD OF COMMISSIONERS CODE OF ETHICS**

**Receipt and Acknowledgement**

I understand that each Commissioner is responsible for reviewing, understanding, acknowledging and personally upholding the Board of Commissioners Code of Ethics (as such may be amended from time to time, the "Code"), and for familiarizing himself or herself with the applicable detailed elements of other policies and procedures.

By executing this Receipt and Acknowledgement, I hereby acknowledge that:

1. I have received and read a copy of the Code;

2. I understand the contents of the Code;

3. I have familiarized myself with the applicable detailed elements of the Code of Ethics and other policies and procedures pertaining to all Commissioners, and employees if any, of San Juan County Public Hospital District No. 1;

4. I affirm my commitment to, and compliance with, the standards and procedures set forth in the Code; and

5. I am not aware of any violations of the Code involving myself that occurred since the later of the adoption of the Code, the last time I executed and delivered a Receipt and Acknowledgement, or the beginning of the last fiscal year that have not otherwise been reported in accordance with the procedures set forth in the Code.

6. I acknowledge that my execution of this Receipt and Acknowledgement has been requested by the Board of Commissioners as a part of the District's ongoing program to ensure compliance with the terms of the Code, and that the District and the Board intended to rely upon the representations made herein.

Printed name: _____

Signature: _____

Date: _____

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Printed name: Everett J. Clary

Signature: Everett J. Clary

Date: 01/02/2020

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Printed name: Gail Leschine. Seitz

Signature: Gail Leschine-Seitz

Date: 1/2/2020

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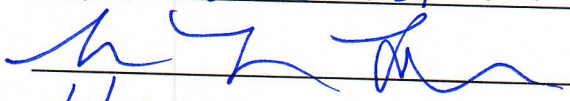
Printed name: Anna Lisa Lindstrum

Signature: 

Date: 1/2/20

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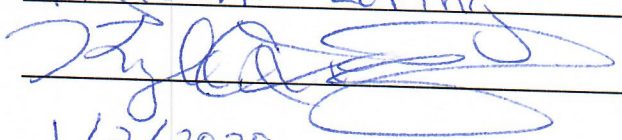
Printed name: Kyle A. Loring

Signature: 

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Printed name: Patricia M. Lehman

Signature: Patricia M Lehman

Date: 1-2-2020