

**APPENDIX**

**CONFLICT OF INTEREST CODE OF THE COUNTY OF SANTA CLARA**

**EXHIBIT "A"**  
**LIST OF DESIGNATED POSITIONS FOR**  
**VALLEY HEALTH PLAN**

<b>Designated Position</b>	<b>Disclosure Category</b>
Administrative Services Manager II	3
Assistant Claims Manager	3
Business Intelligence Analyst	4
Business Systems Analyst	4
Epic Systems Analyst	4
Health Care Financial Manager	3
Health Care Services Business Development Analyst	3
Information Architect	4
Instructional Designer	4
Integration Analyst	4
IT Manager	4
IT Project Manager	3
Manager, Valley Health Plan Utilization Management	3
Pharmacist Specialist	3
Physician-VMC	3
Program Manager I	3
Program Manager II	3
Program Manager III	3
Provider Relations Manager	3
Quality Improvement Manager-Ambulatory & Comm Health Services	3
Senior Accountant	3

<b>Designated Position</b>	<b>Disclosure Category</b>
Senior Business Intelligence Analyst	4
Senior Business Systems Analyst	4
Senior Epic Systems Analyst	4
Senior Financial Analyst	3
Senior Health Care Program Analyst	3
Senior Integration Analyst	4
Senior IT Manager	4
Senior IT Project Manager	4
Senior Management Analyst	3
Utilization Review Supervisor - VHP	3
Valley Health Plan – Assistant Director, Managed Care Programs	1
Valley Health Plan – Chief Business Development Officer	1
Valley Health Plan – Chief Executive Officer	1
Valley Health Plan – Chief Financial Officer	1
Valley Health Plan – Chief Medical Officer	1
Valley Health Plan – Chief Operations Officer	1
Valley Health Plan – Medical Director	3
Valley Health Plan Member Services Manager	3
VHP Member Services Supervisor	3
VHP Pharmacy Services Division Director	3
Consultant	2

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**EXHIBIT “B”**  
**DISCLOSURE CATEGORIES FOR**  
**VALLEY HEALTH PLAN**

Pursuant to the County of Santa Clara’s Conflict of Interest Code, Disclosure Categories 1 and 2 shall read as follows for all Code Agencies.

**Disclosure Category 1:** Persons in this category shall disclose:

(1) all investments in, business positions in, and income (including gifts, loans and travel payments) from:

(a) all sources that provide, plan to provide, or have provided in the last two years, facilities, goods, software, hardware, or related technology, equipment, vehicles, machinery or services, including training or consulting services, to the County;

(b) all sources that are subject to the regulatory, monitoring, investigatory, enforcement, valuation, certification, permit or licensing authority of, or have an application for a license, permit or certificate pending before, the County;

(c) all sources that receive, are planning to apply to receive, or have received in the last two years, grants or other monies from or through the County; and sources that receive referrals to provide assessments and/or treatments that are required or recommended by the County; and

(2) all interests in real property in the County of Santa Clara located entirely or partly within the County, or within two miles of County boundaries, or of any land owned or used by the County.

**Disclosure Category 2:** Each Consultant shall disclose: (1) all investments in, business positions in, and income (including gifts, loans and travel payments) from: (a) all sources that provide, plan to provide, or have provided in the last two years, facilities, goods, software, hardware, or related technology, equipment, vehicles, machinery or services, including training or consulting services, to the County; (b) all sources that are subject to the regulatory, monitoring, investigatory, enforcement, valuation, certification, permit or licensing authority of, or have an application for a license, permit or certificate pending before, the County; (c) all sources that receive, are planning to apply to receive, or have received in the last two years, grants or other monies from or through the County; and sources that receive referrals to provide assessments and/or treatments that are required or

recommended by the County; and (2) all interests in real property in the County of Santa Clara located entirely or partly within the County, or within two miles of County boundaries, or of any land owned or used by the County, subject to the following limitation: the Code Agency for which a consultant works may determine in writing, following approval by County Counsel as to form and legality, that the particular consultant is hired to perform a range of duties that is limited in scope and, thus, is not required to comply with the full disclosure requirements described above, but instead must comply with more tailored disclosure requirements specific to that consultant. Such a determination shall include a description of the consultant's duties and, based upon that description, a statement of the extent of disclosure requirements.

In addition to the above two categories, Valley Health Plan shall have the following categories:

**Disclosure Category 3:** Persons in this category shall disclose all investments in, business positions in, and income (including gifts, loans and travel payments) from:

- (1) all sources that are health or mental health care providers, facilities, laboratories, clinics or nursing homes, or which provide goods, services, medication, or equipment to, or for the use by, health and mental health care providers;
- (2) all sources that provide, plan to provide, or have provided in the last two years, facilities, goods, treatment, medications, software, hardware, or related technology, equipment, vehicles, machinery, or services, including training or consulting services, to the County of Santa Clara Health System; and
- (3) all sources that receive, are planning to apply to receive, or have received in the last two years, grants or other monies (a) from or through the County of Santa Clara Health System, or (b) from or through the County of the type managed or administered by the County of Santa Clara Health System; and sources that receive referrals to provide assessments and/or treatments that are required or recommended by the County of Santa Clara Health System.

**Disclosure Category 4:** Persons in this category shall disclose all investments in, business positions in, and income (including gifts, loans and travel payments) from all sources that provide facilities, goods, software, hardware, or related technology, equipment, machinery, or services, including training or consulting services, related to information systems, computers, networks, applications, technological infrastructures or architectures, or telecommunications of the type utilized by the County of Santa Clara Health System.