

**CONFLICT OF INTEREST CODE FOR THE  
CALIFORNIA HEALTH BENEFIT EXCHANGE**

The Political Reform Act (Government Code Section 81000 et seq.) requires state and local government agencies to adopt and promulgate conflict of interest codes. The Fair Political Practices Commission has adopted a regulation (2 Cal. Code Regs. Sec 18730) that contains the terms of a standard conflict of interest code, which can be incorporated by reference in an agency's code. After public notice and hearing it may be amended by the Fair Political Practices Commission to conform to amendments in the Political Reform Act. Therefore, the terms of 2 California Code of Regulations Section 18730 and any amendments to it duly adopted by the Fair Political Practices Commission are hereby incorporated by reference. This regulation and the attached Appendix A designating officials and employees, and Appendix B establishing disclosure categories, shall constitute the conflict of interest code for the **California Health Benefit Exchange (Exchange)**

Designated employees shall file statements of economic interest with the **California Health Benefit Exchange (Exchange)**. The **Exchange** shall make the statements available for public inspection and reproduction. (Government Code Section 81008). Upon receipt of the statements of Members of the Board and the Executive Director, the **Exchange** shall make and retain a copy and forward the original to the Fair Political Practices Commission. Statements for all other designated employees will be retained by the **Exchange**.

**CALIFORNIA HEALTH BENEFIT EXCHANGE  
APPENDIX A**

<u>List of Designated Positions</u>	<u>Assigned Disclosure Categories</u>
Board Members	1
Executive Director	1
Chief Medical Officer	1
Operations	
Chief Operations Officer	1
Assistant Chief Operations Officer	1
Assistant for Program Policy	1
Assistant for Enrollment and Eligibility	1
Navigator Manager	1
Chief Technology Officer	1
IT CalHEERS Project Director	1
Chief Financial Officer	1
Assistant Chief Financial Officer	1
Individual and Small Group Health Plan Contracting	
Health Plan Contracting Director	1
Small Business Options Program (SHOP) Exchange	
SHOP Exchange Director	1
SHOP Sales and Marketing Director	1
Assistant Policy Director	1
Assistant SHOP Director	1
Assistant Sales Director	1
Legal	
General Counsel	1
Staff Counsel	1
Government Relations	
Government Relations Director	1
Communications and External Affairs	
Communications and External Affairs Director	1
Marketing Director	1
Actuary and Research	
Chief Actuary Director of Research	1

Procurement Personnel

2

Consultants/New positions

\*

\* Consultants/New Positions and individuals serving in new positions shall be included in the list of designated positions and shall disclose pursuant to the broadest disclosure category in the code, subject to the following limitation:

The Executive Director may determine in writing that a particular consultant/new position, although a "designated position," is hired to perform a range of duties that is limited in scope and thus is not required to fully comply with the disclosure requirements described in this section. Such written determination shall include a description of the duties and, based on that description, a statement of the extent of the disclosure requirements. The Executive Director's determination is a public record and shall be retained for public inspection in the same manner and location as this conflict-of-interest code. (Government Code Sec. 81008).

**CALIFORNIA HEALTH BENEFIT EXCHANGE  
APPENDIX B**

1. Designated employees shall disclose all investments and business positions in business entities, and income, including gifts, loans, and travel payments, from the following:
  - Health insurance carriers.
  - Health insurance agents or brokers.
  - Health care providers.
  - Health care facilities or health clinics.
  - Pharmaceutical companies.
  - Medical device or equipment manufacturers or distributors.
  - Trade associations of health insurance carriers, health insurance agents or brokers, health care providers, health care facilities or health clinics, pharmaceutical companies, and medical device or equipment manufacturers or distributors.
  - Organizations representing individuals with specific medical conditions.
  - Information technology consulting firms.
  - Sources of the type to provide goods, equipment, materials, supplies, and information technology or telecommunication products to the California Health Benefit Exchange.
  - Sources of the type to provide personal services to the California Health Benefit Exchange, including, but not limited to, health care and insurance research consulting firms.
  - Sources of the type to receive funding from or through the California Health Benefit Exchange.
  
2. Designated employees shall disclose investments and business positions in business entities, and sources of income, which provide goods, equipment, materials, supplies, and information technology or telecommunication products of the type used by the California Health Benefit Exchange.

This is the last page of the conflict-of-interest code for the **California Health Benefit Exchange**



**CERTIFICATION OF FPPC APPROVAL**

Pursuant to Government Code Section 87303, the conflict-of-interest code for the **California Health Benefit Exchange** was approved on February 29 2012.

A handwritten signature in black ink, appearing to read "John Wallace", written over a horizontal line.

John Wallace

Executive Director

Fair Political Practices Commission

By:

William J. Lenkeit

Senior Counsel, Legal Division

Pursuant to Government Code Section 11346.2:

Secretary of State Filing Date: April 9, 2012

Effective: May 9, 2012