

## MONTGOMERY COUNTY ETHICS COMMISSION

## October 15, 2025 Waiver 25-10-012

Pursuant to § 19A-12(b)(1)(B) of the Public Ethics Law, a public employee must not be employed by a business that negotiates or contracts with the County agency with which the public employee is affiliated, unless the Ethics Commission grants a waiver.

Naanco Woewiyu is a Child Welfare Caseworker at the Children, Youth and Family Services (CYFS) Division at the Montgomery County Department of Health and Human Services (DHHS). She would like to engage in outside employment as a Substitute Rehabilitation Counselor with Cornerstone Montgomery. Cornerstone Montgomery has several contracts for various programs with DHHS.

As a Child Welfare Caseworker with CYFS, Ms. Woewiyu conducts home, school and community visits with children and families, as well as writing reports, case plans, and service agreements for families receiving services from CYFS. She supervises parent-child visitations, coordinates with various service providers to ensure timely delivery of assistance to children and families in need, and she provides reports and testimony in court cases as needed.

In her proposed outside employment at Cornerstone Montgomery, she would work as a Substitute Rehabilitation Counselor, providing support to adult residents with severe borderline schizophrenia and co-occurring disorders. She will be teaching life skills such as personal hygiene, meal preparation, and proper medication habits.

Her proposed role at Cornerstone Montgomery is not funded by any contracts between DHHS and Cornerstone Montgomery, a detail confirmed by her proposed supervisor at Cornerstone Montgomery. And she performs no contract monitoring or execution functions in either her County or her proposed Cornerstone Montgomery roles. In the unlikely event that a crossover client is assigned to Ms. Woewiyu, she will ask that the case be reassigned to one of her colleagues.

Pursuant to § 19A-8(b)(3) of the Public Ethics Law, the Ethics Commission may grant a waiver of the prohibition of § 19A-12(b) if the Ethics Commission concludes that the proposed employment is not likely to create an actual conflict of interest. Upon reviewing the request and the Department's concurrence in and support for the waiver request, the Commission finds that there is no actual conflict of interest. Pursuant to the standard of § 19A-8(b)(3), the Commission grants the waiver of the prohibition of § 19A-12(b).

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The Commission notes that while 19A-12(b)'s prohibition is waived, the other provisions of the ethics law are not, including those prohibiting an employee from working on official matters relating to the outside employer. The approval of this waiver is conditioned on the facts upon which the waiver is based remaining unchanged. It is also conditioned on Ms. Woewiyu not making referrals as a County employee to Cornerstone Montgomery.

This waiver expires when the outside employment approval with which it is associated expires, unless a continuation request for outside employment is timely filed and subsequently approved by the Ethics Commission. In reaching this decision, the Commission has relied upon the facts as presented by Ms. Woewiyu.

For the Commission:

Eliabeth K Kellar

Elizabeth Kellar, Chair