



## MONTGOMERY COUNTY ETHICS COMMISSION

**August 15, 2024**

**Waiver 24-08-005**

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.

Pauline Wilson is a Community Services Aide II (CSA II) at the Behavioral Health and Crisis Services Division (BHCS) of the Montgomery County Department of Health and Human Services (DHHS). She would like to engage in outside employment as a Certified Peer Recovery Specialist, an entity that has contracts with DHHS.

As a CSA II at BHCS, Ms. Wilson acts as a Community Service Aide as well as a peer recovery specialist. She answers crisis phone calls, participates in the Mobile Crisis Team, provides support to therapists, and completes referrals for the Stabilization/Diversion Team.

In her proposed role as a Certified Peer Recovery Specialist with the Tree of Hope, she maintains contact with persons in recovery either by phone or in person, offers resources to persons in recovery, and provides general support to persons in recovery.

She has no contract monitoring or procurement responsibilities in either of her two roles.

Tree of Hope contracts with DHHS but Ms. Wilson's role as a Certified Peer Recovery Specialist with the Tree of Hope is not funded by any County contracts with Tree of Hope.

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 a review of 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).

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. Wilson not

---

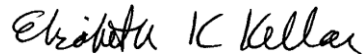
**MONTGOMERY COUNTY ETHICS COMMISSION**

**100 MARYLAND AVENUE, ROOM 204, ROCKVILLE, MARYLAND 20850**  
**OFFICE: 240.777.6670 FAX: 240.777.6672**

making referrals as a County employee to Tree of Hope. She will pass any DHHS clients needing such a referral to a colleague at DHHS. And she will not work with any Tree of Hope clients in her County role.

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. Wilson.

For the Commission:



---

Elizabeth Kellar, Chair