



MONTGOMERY COUNTY ETHICS COMMISSION

October 10, 2024

Waiver 24-10-010

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.

Jannel Thomas is a Therapist II at the Behavioral Health and Crisis Services (BHCS) Division at Montgomery County Department of Health and Human Services (DHHS). She would like to engage in outside employment as a Clinical Supervisor at the University of Maryland Center for Healthy Families (UMd), an entity that contracts with DHHS.

As a Therapist II with the Child and Adolescent Behavioral Health Program at DHHS, Ms. Thomas provides assessment, case management, individual and family therapy, and supportive services to children and adolescents with family problems, behavior problems, trauma, and with a range of mental health problems that may be co-occurring with the use of substances.

In her proposed role as a Clinical Supervisor at UMD, she would provide clinical supervision to student interns at the UMD Center for Healthy Families. This consists of helping adult graduate student interns with treatment planning; ensure compliance with school and state regulations; clinical assessment; complete student evaluations; case planning; reviewing recorded sessions; live sessions; recorded sessions; and emergency case consultation. She would not provide direct clinical therapy services to any population within this role. In the remote chance that she is asked to supervise a student who is also an employee of DHHS, she has promised to recuse herself and ask another clinical supervisor to handle that student's case.

She would have no contract monitoring, procurement or execution responsibilities in her role with UMD, and she has no contract monitoring responsibilities in her official capacity with DHHS either.

UMD contracts with DHHS but Ms. Thomas's role as a Clinical Supervisor at UMD is not funded by any County contracts with UMD.

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

MONTGOMERY COUNTY ETHICS COMMISSION

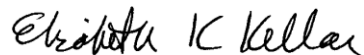
**100 MARYLAND AVENUE, ROOM 204, ROCKVILLE, MARYLAND 20850
OFFICE: 240.777.6670 FAX: 240.777.6672**

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. Thomas not making referrals as a County employee to the UMD Center for Healthy Families.

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. Thomas.

For the Commission:



Elizabeth Kellar, Chair