



## MONTGOMERY COUNTY ETHICS COMMISSION

**August 6, 2025**  
**Waiver 25-08-008**

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.

Johanna Arias Bonilla is a Social Worker III at the Public Health Services (PHS) Division at the Montgomery County Department of Health and Human Services (DHHS). She would like to engage in outside employment as an Inpatient Care Navigator/Discharge Planner at Adventist Healthcare – Shady Grove Medical Center (Adventist). Adventist has three contracts with DHHS.

As a Social Worker III, Ms. Arias Bonilla provides case management services to HIV-positive residents of Montgomery County, conducting intake assessments and creating a comprehensive needs determination for each individual patient. She specifically serves the HIV-positive population residing in Montgomery County, Maryland.

In her proposed role as an Inpatient Care Navigator/Discharge Planner at Adventist, Ms. Arias Bonilla would be helping currently hospitalized patients connect with next-step medical care and treatment once they are discharged. In this proposed role, she would work with the general population of hospitalized patients, regardless of their health status. The population she would serve in her proposed role at Adventist would be any individual being discharged from the hospital, but she will recuse herself from crossover patients at Adventist in order to avoid any potential conflict of interest. Her proposed role at Adventist is not funded by any contracts between DHHS and Adventist. And she performs no contract monitoring or execution functions in either her County or her proposed Adventist roles.

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).

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

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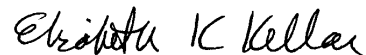
**MONTGOMERY COUNTY ETHICS COMMISSION**

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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. Arias Bonilla not making referrals as a County employee to Adventist. She will pass any DHHS clients needing such a referral to a colleague at DHHS.

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. Arias Bonilla.

For the Commission:

A handwritten signature in black ink, appearing to read "Elizabeth Kellar".

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Elizabeth Kellar, Chair