



## MONTGOMERY COUNTY ETHICS COMMISSION

**March 11, 2026**  
**Waiver 26-03-004**

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.

Jattu Navo is a Program Manager II at the Social Services Division (SSD) of the Montgomery County Department of Health and Human Services (DHHS). She would like to engage in outside employment as a Direct Support Professional (DSP) for Makom, an entity that has one contract with DHHS.

As a PMII with SSD, Ms. Navo's responsibilities include providing administrative support to the division managers and staff who work with low-income residents of Montgomery County. She does have contract monitoring duties insofar as she completes MOUs with hospitals and nursing homes.

In her proposed outside employment as a DSP for Makom, she would provide ongoing, direct support to individuals with intellectual and developmental disabilities as they pursue their self-determined life's aspirations. This can include the development of new skills and/or knowledge in building interdependence, social capital and, to the extent to which anyone can, independence.

Ms. Navo would have no contract monitoring, procurement or execution responsibilities in her role with Makom, and she has no contract monitoring responsibilities over the contract between Makom and DHHS in her official capacity with SSD.

Makom has a contract with the Behavioral Health and Crisis Services Division (BHCS) of DHHS to operate 24-hour supervised group living for adults with serious and persistent mental illness. The value of the contract is less than \$100,000 according to publicly available records of the contract. Ms. Navo's role with Makom will be partially but not completely funded through that contract. However, she has no ability to impact the contract in either her County role or her proposed role with Makom.

Ms. Navo acknowledges that there is a possibility of crossover clients between SSD and Makom. However, Ms. Navo does not provide direct support to SSD clients. Thus, the potential for crossover clients between her two roles is largely theoretical. However, if presented with a crossover client, she will hand that case to a colleague in order to prevent a conflict of interest.

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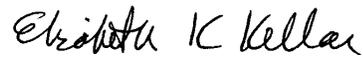
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Pursuant to § 19A-8(b)(3) of the Public Ethics Law, the Ethics Commission may grant a waiver of the prohibition of § 19A-12(b) if the Ethics Commission concludes that the proposed employment is not likely to create an actual conflict of interest. Upon reviewing the request and the Department's concurrence in and support for the waiver request, the Commission finds that granting the waiver is not likely to cause an 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. Navo not making referrals as a County employee to Makom. She will pass any crossover 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. Navo.

For the Commission:



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Elizabeth Kellar, Chair