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June 21, 2023

Jody Bishop-Pullan
Director, Health and Human Services
% City of Stamford
888 Washington Boulevard, 8th Fl.
Stamford, CT 06901

Dear Ms. Bishop-Pullan:

The Board of Ethics (the "Board") has reviewed your April 27, 2023 email and your statements to the Board at its May 17, 2023 meeting in connection with your request for an advisory opinion ("Request") concerning your ethical obligations as the Director of Health and Human Services for the City of Stamford ("Director"). As an employee of the City of Stamford, you are bound by its Code of Ethics ("the Code"). You have asked whether, if you serve on the Advisory Board of a local non-profit, Inspirica, there will be any violations of the Code. We thank you for the work you do on behalf of the citizens of Stamford and for this request.

Before discussing the pertinent Code sections, it is important to set forth the facts you shared. You serve as the Director of the Health and Human Services Department. The Executive Director of Inspirica, a local nonprofit that supports and provides programs for the unhoused people of Stamford, asked you to serve on their Advisory Board (which meets two times per year). You believe you were invited to join their Advisory Board because of your expertise in public health. A recent Stamford Community Health Needs Assessment determined that there is a strong connection between housing and community health with housing ranking third among the challenges. The Advisory Board will be addressing the issue of how to prepare and plan for housing challenges, as well as other emerging issues.

Inspirica is a community partner with the City of Stamford. In addition to its Advisory Board, Inspirica also has an Executive Board which handles the day-to-day work and oversight of Inspirica. The Executive Board makes policy decisions. The Advisory Board does none of this.

You informed us that there is no official action that you can take while on the Advisory Board that would impact your work as the Director. Inspirica does apply for grant monies from the City of Stamford, but all those requests go through the Board of Representatives. You also informed us that the Health and Human Services Department (“Department”) does not render services directly to Inspirica clients.

Of relevance to our analysis are the following sections of Stamford Municipal Code of Ethics (the “Code”) as revised on October 4, 2021 by Ordinance No. 1280: Section 19-4 and Section 19-5.

Section 19-4(A) of the Code sets forth, in relevant part, the following general rule regarding conflicts of interest:

“To avoid the appearance and risk of impropriety, a city officer or employee shall not take any official action that such person knows is likely to affect the economic interests of:] . . . (1) the officer or employee . . . or (2) such person’s . . . spouse.”

The Board concludes that since your role on the Advisory Board is merely to give public health advice to Inspirica, you have no ability to influence the economic interest of Inspirica nor your own economic interests. Any request for monies from the City of Stamford, would be directed at the Board of Representatives, not at your Department. Accordingly, by being on the Advisory Board, there is no violation of Section 19-4.

Another relevant Code Section 19-5(A) further limits the conduct of a city employee as follows:

“General rule. A city officer or employee may not use such person's official position to advance or impede private interests.”

“Private interest” is not defined in the Code, but the Board finds that your advisory role with Inspirica in no way advances a private interest, and therefore there is no violation of Section 19-5.

This advisory opinion is a public document. The opinions stated herein are expressly based on the accuracy and completeness of the information presented to the Board and are confined to the specifics of the question(s) put to the Board in rendering such opinions. The Board wishes to emphasize that its finding pertains only to your specific circumstances and should not be construed as precedent for any future requests for an advisory opinion or complaint filed with the Board. Additionally, if you find while serving on the Inspirica Advisory Board, that you are asked to do more than advise, you should revisit your request for an advisory opinion with the Board of Ethics.

Thank you for proactively seeking advice on compliance with the Code.

Very truly yours,



Allan D. Lang, Chair
Board of Ethics

Cc: City & Town Clerk’s Office