



CONFLICT OF INTEREST AND ETHICS PROCEDURE

1.15

Effective Date: 07/18

Purpose: The Barren River District Health Department (BRDHD) requires honesty and integrity from every employee in all dealings with the public, patients and co-workers. The purpose of this procedure is to provide guidance to employees in business conduct, conflicts of interest and ethical considerations.

Failure to Comply: Employees who fail to comply with this procedure will be subject to disciplinary procedures. Agency failure to comply could result in violation of federal program standards.

Procedure: Every employee has an individual responsibility to deal ethically and without conflict of interest in all aspects of employment and to comply fully with all laws, regulations, policies and procedures.

Staff shall not engage in any activities or outside employment that may result in a conflict of interest. A conflict of interest exists if financial interests or other opportunities for personal benefit may exert a substantial and improper influence upon an employee's professional judgment in exercising any local health department duty or responsibility. Staff shall not use their positions to secure anything of value, financial gain, or personal benefit that would not ordinarily accrue to them in the performance of their official duties. Nor shall they accept any compensation from any other agency or individual for work performed in the course of their employment by the local health department, except under the limited circumstances permitted in a formal conflict of interest management agreement. See Administrative Regulation 902 KAR 8:160 Section 3, Conflict of Interests.

Guidelines to Prevent Conflict Of Interest

Conflict of interest and work outside the local health department.

A. Extramural activities

Staff engaging in extramural activities must avoid the use of information or procedures that may involve a conflict of interest with assigned local health department responsibilities. Failure to adequately perform local health department responsibilities due to involvement in extramural activities is considered a neglect of duty and may result in disciplinary action up to and including termination, regardless of whether the activity is approved.

B. Prior approval

Requests to engage in extramural activities during a time normally designated as schedule work time must have the prior approval of the appointing authority. Extramural activities conducted outside of designated work time which present a potential conflict of interest must be reported.

C. Use of local health department name

Staff members engaging in extramural activities shall not use the name of the local health department, its units, or any other local health department service in such a manner as to suggest institutional endorsement or support of a non-local health department enterprise, product, or service. Neither business cards bearing the local health department name, address, telephone numbers nor local health department stationery should be used in such a manner as to suggest institutional endorsement or support of a non-local health department enterprise, product, or service.

WIC Services

This procedure outlines the responsibilities of BRDHD and its staff in providing WIC services to employees, relatives, household members or close friends of employees without conflict of interest. BRDHD employees should avoid any situation that is or appears to be a conflict of interest. In addition, employees shall not provide services to any person that may present the possibility of favoritism or preferential treatment.

There must be a separation of duties for WIC eligibility and issuance of benefits. One employee cannot determine income eligibility, risk eligibility, and issue food benefits for the same participant. There should be at least two employees performing the certification process. As an example, one employee can determine income eligibility and issue food instruments, and another staff member can determine nutritional risk.

To avoid a conflict of interest, an employee shall not:

- Certify oneself
- Certify a relative, household member or close friend
- Determine eligibility for all certification requirements (income and risk) and issue food benefits for the same participant

When circumstances prevent these restrictions, records for certification and issuance must be reviewed and signed by the supervisor. The Conflict of Interest and Ethics Procedure is to protect staff and BRDHD from what could appear to be preferential or favored treatment.

All employees providing WIC services in our clinics will complete P-12 WIC Conflict of Interest Disclosure Form and update it annually or as changes occur. Once completed, this form will be forwarded to the

clinic nursing supervisor to include all names on P-13 WIC Conflict of Interest Tracking Form for review by the agency WIC Coordinator and state or federal staff during monitoring visits. It is the responsibility of the employee to assure this information is accurate and remains current.

Forms: [P-12 WIC Conflict of Interest Disclosure Form](#); [P-13 WIC Conflict of Interest Tracking Form](#)

References: [Administrative Regulation 902 KAR 8:160 Section 3, Conflict of Interests](#)

Contact Person: Human Resources Manager

Procedure Origination, Revision, and Review Tracking

Procedure Number	Origination Date	Description of Revision or Reviewer Name
1.15	12.14.2017	HR Manager – Procedure Creation
1.15	9.29.2020	HR Manager-review