

County Of San Diego
Health and Human Services Agency (HHSA)

SUBJECT: HHSA Conflict of Interest

NO: HHSA-M-3.4

PAGE: 1 of 2

DATE: November 20, 2025

REFERENCE: Government Code Sections 1125-1127; County Board of Supervisors' Resolution No. 01-207; various State Laws (Government Code Sections 1090, 1120, 1125-1127); HHSA-M-1.2.

POLICY:

The Board of Supervisors, pursuant to Government Code sections 1125-1127, has adopted rules and regulations to govern the application of various state laws (Government Code Sections 1090, 1120, 1125-1127) concerning incompatible activities of County officers and employees. Resolution No. 01-207, adopted July 31, 2001 (10), implements provisions of the Government Code now set forth in Section 1125 et seq. It forbids local agency (including County) officers or employees to "engage in any employment, activity, or enterprise for compensation which is inconsistent, incompatible, in conflict with, or inimical to his or her duties as a local agency officer or employee or with the duties, functions, or responsibilities of his or her appointing power or the agency by which he or she is employed."

In compliance with Resolution No. 01-207, and with State and federal laws and regulations, the following shall serve as an outline of rules regarding incompatible activities to be followed by Health and Human Services Agency (HHSA) staff. As an HHSA employee, you are expected to uphold the highest standards of ethical conduct in the performance of your duties and commit to:

1. Reporting all outside employment as required on the County of San Diego Disclosure Statement. Outside employment is generally considered incompatible if:
 - a. It involves the use for private gain or advantage of an employee's County time, facilities, equipment, or supplies; or the badge, uniform, prestige, or influence of an employee's office or position; or
 - b. It involves the receipt by the employee of any money or other consideration from anyone other than the County for the performance of an act which the employee, if not performing such act, would be required or expected to render in the regular course or hours of their County employment, or as a part of their duties as an employee; or
 - c. It involves the performance of an act in, other than their capacity as an employee, which may later be subject directly or indirectly to control, inspection, review, audit, or enforcement of any other employee of the County; or
 - d. It involves such time demands as would interfere with the efficient performance of their County duties.
2. If providing similar services to County duties in outside employment, refrain from providing services to clients that may be enrolled in each program by requesting reassignment of client in whichever program client is seen secondarily.

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PAGE: 2 of 2

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3. Disclosing to your supervisor any relationships that may impact your duties, such as a relative, friend or tenant who is an applicant or recipient of HHSA services that may present for services at the location you are stationed, and ensuring any such applicant is assigned to alternative County staff.
4. Disclosing to your supervisor or management a personal relationship with another staff in your chain of supervision.
5. Refraining from entering into personal relationships with clients, patients, or facility residents met as a result of your HHSA duties which may compromise your judgement or objectivity.
6. Adhering to the California Fair Political Practices Commission regulations related to acceptance of any gifts from persons doing business, or seeking to do business, with the County.

In cases where an HHSA employee reports outside employment that is potentially incompatible with their HHSA duties, HHSA management shall adhere to the review procedures set forth by Business Assurance and Compliance (BAC). Agency Human Resources and BAC will provide support to Agency departments, review potential incompatible activities, and provide guidance to HHSA management.

PROCEDURES: See related procedures and forms at www.cosdcompliance.org.

RESPONSIBILITIES: HHSA is committed to providing high-quality, cost-effective health care and human services in compliance with all federal, State, and local laws, regulations, and ordinances. Violations of these laws, regulations, and ordinances by HHSA employees, providers or agents may expose HHSA to the risk of substantial penalties. Business Assurance and Compliance is responsible for establishing policies and procedures to promote a working environment that fosters adherence to these requirements, and to demonstrate high ethical standards in carrying out the Mission, Vision, and Values of HHSA.

QUESTIONS/INFORMATION: Please contact HHSA Business Assurance and Compliance by email at Compliance.HHSA@SDCounty.ca.gov or by phone at (619) 237-8571.

Approved: _____



Christy Carlson
Director
Business Assurance & Compliance