



## M - 3.4: HHSA Conflict of Interest

**POLICY:** See HHSA-M-3.4 HHSA Conflict of Interest, at [www.cosdcompliance.org](http://www.cosdcompliance.org).

**PROCEDURES:**

1. Employee Responsibilities:
  - a. Report all outside employment as required by County of San Diego Disclosure Statement.
  - b. 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.
  - c. Disclose to your supervisor 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.
  - d. Disclose to your supervisor or management a personal relationship with another staff in your chain of supervision.
  - e. Refrain 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.
  - f. Adhere 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.
2. Supervisor Responsibilities:
  - a. Review Completed County of San Diego Disclosure Statements to determine any potential incompatible employment concerns in accordance with HHSA Policy M-3.4.
  - b. Notify Human Resources and consult Business Assurance and Compliance if further guidance is needed.
  - c. Gather from employee statement of duties at proposed or concurrent outside employer.
3. Human Resources Responsibilities:
  - a. Prepare documentation of current job duties and responsibilities for County position.
4. Business Assurance and Compliance Responsibilities:
  - a. Determine all contracts and associated funding (if potential incompatible employment involves a contracted partner) and provide a review determination with guidance in coordination with Human Resources.

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