



## Conflict of Interest



Policy A-HR-11

June 26, 2009  
Revised April 26, 2013  
Revised September 30, 2016

**Purpose:** This policy serves as a guide for all Three Rivers District Health Department staff regarding conduct in situations that may have ethical implications.

**Policy:** In accordance with principles of sound management, all business affairs shall be conducted within the spirit and intent of high business ethics, honesty, and integrity.

**Procedure:** No employee shall knowingly receive or agree to receive, directly or indirectly, compensation for any services rendered or to be rendered, either by herself/ himself or another, in any cause, proceeding, application, test or other matter which is before the Three Rivers District Health Department.

- I. No employee shall sell, recommend or promote a specific brand of product or equipment that may be subject to inspection or evaluation by Three Rivers District Health Department or its employees.
- II. No employee shall be engaged in a business or have financial interests (1) which would affect the employee's professional relationship with either Three Rivers District Health Department or the Department for Health and Family Services or (2) which would otherwise detract from the performance of the employee.
- III. No contract shall be entered into with a provider when a conflict of interest, real or apparent, will occur. Conflicts of interest fall into the following categories: constitutional, statutory, common-law and Cabinet for Health and Family Services policies. Three Rivers District Health Department will not enter into any contracts with employees. Three Rivers District Health Department will not enter into any contracts with members of the District Board of Health or Local County Boards of Health. Three Rivers District Health Department will not enter into any contracts with professional service corporations which have employees or governing board members who serve in similar capacities for Three Rivers District Health Department. Specifically, contracts for professional services provided on an independent contractor basis that do not exceed \$2,000.00 in a fiscal year shall be automatically exempt from this provision. The Commissioner of the Department for Public Health shall specifically authorize any other exceptions.

- IV. Employees shall not serve as members of the local board of health, in as much as the board of health functions as the governing body of the health department and hence the two positions are incompatible. Under KRS 212-260, the Three Rivers Public Health Director (or designee) serves as the Secretary to the Three Rivers District Board of Health. Acting in the capacity of Secretary, neither the Public Health Director nor the Designee have voting powers.
- V. An employee shall not conduct the following services for themselves or relatives:
- A. Determine eligibility for any local health department service,
  - B. Issue Women, Infants, and Children (WIC) food instruments or prescribe food packages,
  - C. Conduct an inspection or monitor compliance with a health department's medical or environmental standards or regulations.
- VI. No Three Rivers employee who is employed by, or related to, a WIC Vendor shall process the WIC Vendor application, monitor, or revalidate food instruments for that vendor.
- VII. An employee cannot represent a third party in an action against the health department.
- VIII. As specified in KRS/KARs, the political involvement of an employee of the health department shall not:
- A. Serve on or for any political committee, party, or other similar organization;
  - B. Serve as a delegate or alternate to a caucus or party convention, but may vote in the selection of delegates to a party convention and in the selection of precinct committee members;
  - C. Solicit or handle political contributions;
  - D. Solicit the sale of or sell items or tickets for any political party, faction, or candidate; however, an employee may voluntarily purchase the items or tickets;
  - E. Serve as an officer of a political club, as a member or officer of any of its committees, or address a club on any partisan political matters, or be active in organizing it;
  - F. Serve in connection with the preparation for, organizing or conducting a political meeting or rally or address a political meeting on any partisan political matter except to vote;
  - G. Engage in partisan activity at the polls during primary, regular, or special elections in the position of checker, challenger, or watcher;
  - H. Solicit votes and assist voters to mark ballots;
  - I. Become a candidate for nomination or election to any paid partisan office;
  - J. Solicit others to become candidates for nomination or election to those offices described above;
  - K. Distribute partisan campaign literature or material;
  - L. Initiate or circulate partisan political nominating petitions or;

- M. Canvas a district or solicit political support for a party, faction, or candidate, in person or in writing. (19 Ky.R. 2777; eff. 9-3-93; Am. 21 Ky.R. 597; eff. 9-21-94).
  
- IX. An employee or their family members may not accept personal gifts, except those allowed by the administrative Reference: Personnel, from a person, firm, or corporation currently doing business or seeking to do business with Three Rivers. Refer to attachment A-HR-11(A).
  
- X. Nothing in this policy will prohibit the services of the Three Rivers District Health Department being rendered to any Board member on the same basis that services are rendered to all other clients.

---

**District Director**

**Date**

---

**Chairperson, Three Rivers District Board of Health**

**Date**

Form A-HR-11(A)

