

Code of Conduct and Professional Ethics

I. PURPOSE

The purpose of the Code of Conduct and Professional Ethics policy is to establish and communicate standards of conduct for all employees, interns, and volunteers of the Health Agency. The Health Agency Core Values along with the Health Agency Standards of Conduct described below provide broad guidance and expectations to individuals representing the Health Agency in any capacity.

II. SCOPE

These standards apply to every Health Agency employee and contractor doing business with the Health Agency.

III. POLICY

- A. Compliance with this Code of Conduct along with adherence to related policies and laws provide a safe, ethical, and productive work environment that supports the Health Agency's mission and vision.
- B. In addition to compliance with this Code of Conduct, licensed employees are expected to adhere to the licensing and/or certification regulations and Codes of Ethics for his/her profession. In the event of a conflict between this Code of Conduct and a Code of Conduct governing an employee's licensure, employees must consult with a supervisor for guidance.
- C. It is each employee's duty to read and comply with this Code of Conduct and Professional Ethics.

IV. HEALTH AGENCY CORE VALUES

- A. Integrity
 - 1. We are dedicated to high ethical and moral standards and uncompromising honesty in our dealings with the public and each other.
 - 2. We are committed to maintaining the public trust and respect through a commitment to the highest standards of professional ethics.
- B. Collaboration
 - 1. We celebrate teamwork by relying on the participation and initiative of every employee.
 - 2. We work cooperatively within and between departments and the public to address issues and achieve results.
- C. Professionalism
 - 1. We are each personally accountable for the performance of our jobs in a manner which bestows credibility upon ourselves and our community.
 - 2. We consistently treat customers, each other and the resources entrusted to us with respect and honesty.

D. Accountability

1. We assume personal responsibility of our conduct and actions and follow through on our commitments.
2. We balance the needs of the community with the fiscally responsible administration of resources.

V. HEALTH AGENCY STANDARDS OF CONDUCT

A. Respect for Others

The County is committed to providing a work environment in which all individuals, whether employees or members of the public, are treated with honesty, respect, and professionalism. All employees of the Health Agency shall support this commitment when dealing with co-workers and members of the public.

1. Discriminatory Harassment

The County of San Luis Obispo maintains a zero-tolerance policy prohibiting discriminatory harassment in the workplace. Employees must not harass anyone because of race, color, gender, marital status, national origin, religion, medical condition, physical or mental disability, sexual orientation, gender identity or expression, or because the person is 40 years old or older.

Employees also must not harass anyone for opposing discrimination or for participating in the discrimination complaint process.

2. Sexual Harassment

The County of San Luis Obispo maintains a zero-tolerance policy prohibiting sexual harassment in the workplace. Sexual harassment is a form of sex discrimination that is illegal under both state and federal law and constitutes employee misconduct for which disciplinary action, up to and including termination, may result. The County of San Luis Obispo requires that all employees treat the public and other employees with courtesy and respect.

All employees shall annually participate in discrimination and sexual harassment prevention training. In addition, all employees shall read and comply with the [County Policy Against Discrimination, Sexual Harassment, and Retaliation](#).

3. Cultural Competence

The Health Agency is an organization which serves an increasingly changing and diverse population. Conducting business in a manner that respects cultural differences and demonstrates cultural competence is important in achieving our mission as an agency. All employees shall provide services to clients that honor culture beliefs, interpersonal styles, attitudes, and behaviors. See the Behavioral Health Division's [Cultural Competence Plan](#) for additional information.

4. Interpersonal Communications in the Workplace

All personal interactions, including those with co-workers, clients, supervisors, the public, and individuals at other agencies, are to be conducted with respect, courtesy, and consideration. Employees shall not disparage, demean, belittle, or be disrespectful in their communications with others. Employees shall treat others in a manner that supports positive relationships.

5. Violence in the Workplace

The County will not tolerate acts of violence or threats of violence by employees. The County of San Luis Obispo requires that all employees and officers of the County treat the public and other employees with courtesy and respect. Off-duty violence or threats of violence may also be subject to discipline depending on the nexus to the employee's job as well as the discredit such conduct may bring to the County. Violation of this policy by an employee will result in discipline up to and including termination.

All employees shall read and comply with the [County Workplace Violence Policy](#).

6. Drug, Alcohol, and other Controlled Substances in the Workplace

It is the County's policy that employees and officials shall not have their ability to work impaired as a result of alcohol or drug use. The use of medically prescribed medication and drugs is not per se a violation of this policy.

However, employees are urged to notify their supervisors, before beginning work, when taking medications or drugs, which could foreseeably interfere with the safe and effective performance of duties or operation of county equipment. In the event there is a question regarding an employee's ability to safely and effectively perform assigned duties while using such medications or drugs, clearance from a qualified physician may be required. Violation of this policy by an employee will result in discipline up to and including termination.

All employees shall read and comply with the [County Alcohol and Drug Policy](#).

B. Conflicts of Interest

Employees shall avoid any situation which involves or may give the appearance of a conflict between their personal interest and the interest of the County. Employees shall notify their supervisor as soon as they become aware of any potential conflict of interest.

1. Gifts, Entertainment and Favors

Consistent with County policy, employees shall not accept entertainment, gifts, or personal favors that could influence, or appear to influence, business decisions in favor of any person with which the Health Agency has business dealings. Similarly, employees must not accept preferential treatment offered because of their positions with the Health Agency (policy allows acceptance of nominal value gifts that are not given for the purpose of influencing business decisions).

Conversely, employees shall not offer or provide entertainment, gifts, or personal favors to any individual or entity that could influence, or appear to influence, business decisions in favor of any person or entity with which the Health Agency has business dealings.

All employees shall read and comply with the [County Policy on Staff Receiving Gifts and Gratuities](#).

2. Kickbacks and Commissions

Employees may not receive payment or compensation for business conducted for the Health Agency except as authorized under County policy. The Health Agency prohibits the acceptance of kickbacks and commissions from suppliers or others.

3. Client or Vendor Referral

Employees shall not refer a client to themselves, or to a vendor with whom they have a financial or personal relationship without disclosing and receiving permission from their supervisor in advance.

4. Incompatible Employment

Consistent with State law, the County prohibits employees from engaging in any activity for compensation which is inconsistent, incompatible, or in conflict with his/her duties as an employee and/or the business operations of the County of San Luis Obispo. Employees engaged in outside employment or considering a second job shall advise their supervisor immediately.

Employees shall read and comply with the [Health Agency Outside Employment \(Incompatible Activities\) Policy](#).

5. Financial Relationships with Vendors

Employees who currently have or are considering a financial interest in any business for which the Health Agency has a contractual or other business relationship must declare that relationship to Health Agency Management promptly.

6. Social and Dual Relationships with Clients

County of San Luis Obispo Health Agency staff shall refrain from entering into a dual relationship, including business or sexual relationships, when the dual relationship could reasonably be expected to impair the staff member's objectivity, competence, or effectiveness in performing his or her functions, or otherwise risk exploitation or harm to the person with whom the professional relationship exists. Staff shall also refrain from entering into any relationship with a client that is prohibited by law or is prohibited by the employee's licensure. Staff shall report unavoidable dual relationships to their supervisor as soon as practicable to reduce the potential for exploitation or harm.

Employees shall read and comply with the Policy on [Social and Dual Relationships with Clients](#).

- C. Handling of Transactions, Assets, and Cash

1. Fraud, Waste, and Abuse Prevention

The primary emphasis of the Health Agency's Compliance Plan is to prevent, detect and correct any fraud, waste and/or abuse in the health care system.

Every employee shall adhere to all statutes, regulations and contractual obligations related to the prevention of fraud, waste, and abuse. [Fraud, Waste and Abuse Prevention Policy](#)

2. Claims for Services

Employees shall take reasonable precautions to ensure that claims are prepared and submitted accurately and timely and are consistent with all applicable laws, regulations, rules, and guidelines. Employees engaged in

coding and billing of services shall understand the regulations and best practices governing coding and billing for services.

Employees who process claims or support the processing of claims job shall read and comply with the [Fraud, Waste and Abuse Prevention Policy](#).

3. Travel and Expense and General Expense Reimbursement

When an employee's position requires spending Health Agency funds or incurring any reimbursable travel or personal expenses, that individual must comply with all County and Health Agency policies and procedures related to travel or personal expense reimbursements including the [County Travel Policy](#).

4. Cash Handling

Employees who have access to Health Agency funds in any form must follow the prescribed procedures for cash handling as detailed in the County Auditor-Controller and Health Agency's policies and procedures. The Health Agency maintains strict standards to prevent fraud and dishonesty.

Employees who handle cash as part of their job shall read, sign, and comply with the [County Cash Handling Policy](#) prior to handling any cash.

5. Purchasing

Purchasing decisions must be made consistent with County policy and with the purpose of obtaining the highest quality product or service at the most reasonable rate. No purchasing decisions may be made based on considerations that employees, their family member, or friend will benefit.

See the [County Purchasing Handbook](#) and the [Purchasing Card \(Cal Card\) Policy](#) for additional information.

6. County Assets

All employees shall to the best of their ability, protect and safeguard the assets of the County and the Health Agency. Assets may include but are not limited to: structures and offices, furniture and fixtures, county owned vehicles, copiers, fax machines, County owned telephones, keys/fobs, computers, cameras, tablets, testing equipment, medical equipment, supplies, or any other property of owned by the County. Assets additionally include all intellectual property of the County. Using county assets for the benefit of employee's outside employment or using these assets to conduct outside employment activities is prohibited. Employees must promptly report any missing or misused equipment or assets to their supervisor.

7. Use of County and/or Health Agency Logo, Letterhead, or Identification

Employees shall not use the County and/or Health Agency logo, letterhead, identification stationery or other identifying material for purposes not directly related to Health Agency business.

D. Confidentiality and Privacy

Employees may, in the course of their work, learn information which is confidential under federal and state law, or which is considered confidential and/or proprietary by the Health Agency. Examples include but are not limited to personal health information (PHI), personally identifiable information (PII), financial information, and employee and payroll information.

Employees shall keep confidential all such information, whether verbal, written

or in electronic form. Employees shall not discuss client or family information with anyone not immediately involved with a client's care, treatment, or operations without that client's legal authorization. In addition, employees shall not discuss client or other confidential information with anyone who does not have an authorized need to know.

Employees shall not access or attempt to access any information unless the information is relevant to their job and they are authorized to access it. The logon ID, computer password and electronic signature assigned to employees by the Health Agency are to be used solely by the employee and shall not be shared with any other individual.

All employees shall read and comply with the [SLOHA Confidentiality Statement](#) and the [Health Information Privacy and Security Policy and Procedure](#).

E. Other Standards of Conduct

1. Mandatory Reporting

Any allegations of abuse, neglect, or mistreatment of a client or employee must be reported to the appropriate supervisor and other officials as required by law and investigated in accordance with applicable policies, rules, and regulations. Such mandatory reporting includes but is not limited to: Child Abuse, Elder Abuse, Tarasoff Warnings, Gunshot Wounds, Human Trafficking, etc.

2. Outside Communications

When communicating publicly on matters that involve Health Agency business, employees should not speak for the department on any topic, unless given authority in accordance with the Health Agency's current policies and practices.

When dealing with anyone outside the Health Agency, including public officials, employees must take care not to compromise the integrity or damage the reputation of the department or any individual, business, or government body.

Employees may respond to inquiries by the media on matters directly related to their position, and for which they are authorized to answer for other members of the public. If unsure about level of authority to answer a media inquiry, please ask your supervisor for guidance.

3. Employee Training

Various federal, state and county laws require the Health Agency to provide training for employees in areas such as compliance, privacy, discrimination prevention, cultural competence, and continuing education. Many of these mandates are mirrored in our contracts with the state and federal government. In support of employment development as well as legal compliance, it is the Health Agency's policy that all employees complete assigned training on time and completely.

4. List of Excluded Individuals – Credentialing

Any employee who becomes or may be placed by the state or federal government on a List of Ineligible Individuals must immediately notify their supervisor. An Ineligible Person is any individual who is currently excluded, suspended, debarred or otherwise ineligible to participate in government procurement contracts, federal health care programs, has been convicted of a criminal offense related to the provision of health care items, or is currently excluded on a state exclusion list.

These lists are maintained by the U.S. Office of Inspector General at: https://oig.hhs.gov/exclusions/exclusions_list.asp and the California Dept. of Health Care Services at: [Medi-Cal: Suspended and Ineligible Provider List](#) .

5. IT Acceptable Use of County Computing Systems

When using county computing assets, employees shall follow the standards prescribed by the [County Information Security Program Acceptable Use Policy](#) and the [Health Information Privacy and Security Policy and Procedure](#).

6. Business Records

All documentation produced by employees, including but not limited to reports, letters, forms, timecards, and entries in client records, shall be truthful and accurate to the best of their knowledge.

All records and documents shall be protected and retained as required by professional standards, governmental regulations, and County policies.

Employees shall follow the Health Agency's approved record retention schedule and federal or state record retention requirements.

Employees must not destroy or alter any information or documents in anticipation of, or in response to, a request for documents by any applicable governmental agency or from a court of competent jurisdiction.

7. Political Activities

Both state and federal law restrict the political activities of county employees. County officers and employees are covered by Government Code sections 3201 through 3209 concerning political activities as well as county policy.

All employees engaging in political activities shall comply with state regulations and shall read and comply with [the County Policy on Political Activities of County Employees](#).

8. Licensure and/or Certification

All employees who are required to possess professional licensure or certification as a condition of their job must maintain licensure or certification consistent with the requirements of the applicable licensing or certifying board and shall limit practice to those activities within the scope of their license or certification.

In addition, all employees who drive a vehicle (either County or personal) in the course of doing County business must maintain their driver license in good standing. Please also see the County of San Luis Obispo [Rules for the Use of Vehicles on County Business](#).

Employees must notify their supervisor any time their professional license, certificate, or driver license (if they drive on County business) becomes restricted, revoked, or expired. In addition, employees must notify their supervisor if they are being investigated for a matter that may negatively affect their licensure or if they anticipate problems with their licensure.

F. Prohibition on Retaliation

The County of San Luis Obispo and the Health Agency maintain a zero-tolerance policy prohibiting any adverse employment action against those who in good faith report, or support someone who reports violations of Health Agency/County policy or state/federal law, or engages in other legally protected activity. The County and Health Agency further prohibit retaliation against anyone who participates (as witnesses or accused) in investigations into complaints of alleged misconduct.

Disciplinary action, up to termination will be taken against an employee who is found to have violated this policy.

G. Reporting Activity that Violates this Code of Conduct

Any employee, volunteer, student, agent, contractor, business associate or other person or entity who knows or suspects that there has been a violation of a County or Health Agency policy, or a violation of state or federal law, shall immediately notify a supervisor, manager, or the Compliance Officer of the violation or suspected violation and shall cooperate with any subsequent investigation regarding the complaint.

Regulations require the County to report violations to some state agencies within 24 hours. As such, immediate reporting is essential to meet this statutory timeline. The violation must be reported whether it was committed by the person reporting the violation, or another individual and it must be reported whether intentional or accidental. Reports can be made confidentially by email or Compliance Hotline.

To report a violation to the Compliance Officer:

- Call the Health Agency Compliance Officer at (805) 781-4788 or;
- Call the toll-free Compliance Hotline at (855) 326-9623 or;
- Send an email to HA.Compliance@co.slo.ca.us

VI. DOCUMENT HISTORY

DOCUMENT HISTORY			
Effective Date	Status: Initial/ Revised/Archived Description of Revisions	Author	Approved by
09/06/17	Initial Release	Ken Tasseff	Jeff Hamm
01/04/19	Revision: Revised sections on Dual Relationships and Licensure and made consistent with policy revisions; Other minor typographical changes.	M. Shoresman	Michael Hill
05/20/24	Revision: Updated the Scope; Updated Excluded Individuals Medi-Cal link; Updated HA Director	Gary Harper	Kristin Ventresca

Approved by: [Signature on File] Date: _____
 Nicholas Drews
 Health Agency Director