

Subject: ANNUAL POLICY REVIEW		Issued By: HUMAN RESOURCES	
		Approved By: Kathleen R. Hurtado President & CEO	
Policy #: 513	Issue Date: August 1, 2005	Revised Date: June 9, 2008	Effective Date: June 15, 2008

Reference: Revised and adapted from LAC + USC Healthcare Network Policy #513 and original Annual Policy Review Policy dated 8-1-2005.

PURPOSE

To ensure that critical HRA policies are reviewed with HRA Staff Members no less frequently than once annually.

POLICY

HRA shall remind each Staff Member, at least annually, of Los Angeles County’s, HRA’s and USC’s policies regarding capping, nepotism, outside employment, licensure, solicitation, political activity, and conflict of interest. The following statements shall be used as guidelines for this purpose:

GUIDELINES:

1. **DEFINITION OF CAPPING:** A person employed in a full-time position at HRA shall not – outside of their regular work hours – engage in gainful employment on their own behalf – or on behalf of any other person or persons – which is incompatible with, or which involves a conflict of interest with, their duties or with the duties, functions, or responsibilities of their department. For more information on conflict of interest, please see USC’s Conflict of Interest in Research: Policy and Procedure located here: <http://policies.usc.edu/policies/conflictresearch110107.pdf> and USC’s Conflict of Interest and Ethics: Policy and Procedure located here: <http://policies.usc.edu/policies/conflictadmin110102.pdf> and HRA’s Conflict of Interest Policy located here: <http://www.health-research.org/files/Conflict.pdf>;
2. **DEFINITION OF NEPOTISM:** Nepotism is defined as a preference, favoritism or partiality – in a business setting – to a Close Relation because of the relationship. A Close Relation is defined as a: spouse, mutual financial dependent, significant other (or person with whom you are in an intimate relationship), child, parent, sibling (including in-laws and step-relations), grandparent or grandchild, niece or nephew, aunt, uncle or cousin. HRA will not tolerate nepotism and HRA’s President & CEO may, at their discretion, reassign Staff Members to other departments in order to prevent the occurrence of, or the appearance of, nepotism;
3. **OUTSIDE EMPLOYMENT:** A full-time HRA Employee may work in non-conflicting outside employment up to a limit of 24 hours in any week, provided that their effectiveness in their

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HRA work is not impaired. Employees must notify HRA’s Human Resources Department of their intention to engage in outside employment. For more information, please see HRA’s Outside Employment Policy located here: <http://www.health-research.org/files/Outside.pdf>;

4. **LICENSURE:** When a license is required for a Staff Member to legally perform HRA-related work, a valid license and/or certification must be maintained by the Staff Member and approved documentation provided to HRA’s Human Resources Department for verification. Failure to maintain a required license and/or certification may result in disciplinary action. For more information, please see the HRA Accreditation & Licensure Policy located here: <http://www.health-research.org/files/Accreditation.pdf>. Those working in HRA’s IDS Pharmacy must comply with licensure issues in HRA’s Licensure & Professional Standards Policy & Procedure located here: <http://www.health-research.org/files/pharmacy/Licensure.pdf>;
5. **SOLICITATION:** Los Angeles County Ordinance 2292 prohibits solicitation in any building or on any property belonging to the County of Los Angeles. Although HRA’s facility is not the property of L.A. County, solicitation within HRA’s facility also is prohibited. Solicitation is defined as:
 - The act of selling, or attempting to sell, goods and/or services;
 - Requesting donations without the prior written consent of HRA’s President & CEO; and/or
 - The solicitation of persons to sign and/or distribute political petitions;
6. **POLITICAL ACTIVITY:** Staff Members shall not participate in political activities of any kind during work hours or while in uniform. Staff Members shall also refrain from political activities that would impair the efficiency, integrity, and/or morale of any other HRA Staff Member. For research that is funded in whole, or in part, by the Federal government, Staff Members are subject to further restrictions by the Hatch Act. For additional information on the Hatch Act, go here: <http://www.osc.gov/hatchact.htm>. Staff Members engaging in improper political activities shall be subject to immediate disciplinary action. Questions regarding the appropriateness of any planned political activity should be directed to HRA’s Human Resources Department;
7. **CONFLICT OF INTEREST:** HRA Staff Members shall disclose and report all potential conflict of interest situations by documenting the circumstances in writing and providing such documentation to HRA’s Human Resources Department. Additionally, HRA Staff Members

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shall not engage in, or have any interest in, any business or transactions which conflict with, or appear to conflict with, performing their duties for HRA. No money, favors or other consideration can be accepted by HRA Staff Members from outside of HRA. Staff Members are prohibited from referring any County patients for reimbursable services provided by Staff Members or any related group. No confidential information may be disclosed nor shall Staff Members use confidential information for personal gain.

For more information, please see HRA’s Conflict of Interest Policy located here: <http://www.health-research.org/files/Conflict.pdf>, and HRA’s Research Participants’ Rights Policy located here: <http://www.health-research.org/files/Rights.pdf> .

RESPONSIBILITY

Human Resources Department
Supervisors
Staff Members and Employees

REFERENCES

California Business and Professions Code, Section 6151 and 6152
DHS Policies 704, 708, 740, 741 and 743