



POLICY TITLE Nepotism Conflict of Interest	REFERENCE C.R.S. CDHS Volume 3.603.1
POLICY NO. 15.1000.3.17- CWP	EFFECTIVE DATE February 01, 2017
DIVISION DIRECTOR APPROVAL	BOARD OF COUNTY COMMISSIONERS ADOPTION DATE

BACKGROUND / PHILOSOPHY

The Adams County Colorado Works program is designed to support all low-income families in their progression toward economic well-being. Adams County is committed to providing assistance and services to all those who qualify, including those currently or formerly employed by Adams County, friends or family members of Adams County Employees, volunteers, CWEPS, and interns, or State Employees. Adams County will not discriminate nor show bias with these individuals and/or families. If a potential conflict of interest case is identified, the case will be assigned as a confidential case and will be subject to the confidential case guidelines outlined below.

PURPOSE

The purpose of this policy is to identify the mechanisms by which Adams County prevents conflict of interest or appearance of a conflict of interest from occurring within the department. To ensure that applicants are provided with assistance and services without concern for preferential or biased treatment by program staff, standards and procedures have been developed and outlined by Adams County and are followed by staff who play a role in case management functions.

POLICY

Intake

Applications submitted by an employee of Adams County will be processed in a fair and equitable manner and according to the same guidelines as all other applications. No applicant will be discriminated against based upon the applicant's race, creed, religion, political affiliation, sexual orientation, or station in life. In the event an applicant is a blood-relative, relative by marriage or adoption, former spouse or otherwise related to an Adams County employee or elected official, a close friend or any member of the department staff, or any other reasons exists which might create a potential conflict of interest, the Adams County staff member assigned to the case will immediately notify his/her supervisor. If the conflict of interest is associated to the supervisor's relationship with the applicant, the staff

member will immediately notify the Adams County Workforce and Business Center Local Area Director.

Adams County relies upon the discretion and sound judgment of employees to identify situations as described above, and to follow the appropriate protocol. In the event that a staff member, customer, or citizen at large identifies a conflict on behalf of another entity who has not disclosed the potential conflict, such instances will be documented and shared with the supervisor and/or director as prudence requires.

The supervisor reviews the nature of the potential conflict of interest and determines how the application will be processed, which may include, but is not limited to:

- Reassigning the case to another Adams County staff member within the Department; or
- Permitting the original assigned county staff member to process the application through regular business process.

Ongoing

Adams County makes every effort to ensure that staff are not asked to handle cases where a conflict of interest may be present, but recognizes that sometimes this cannot be avoided. In that circumstance, measures to ensure additional supervision will be made. The case will be classified as Confidential and any changes made to CBMS will be made by designated staff members. This includes the posting of transportation and Supportive Service funds. All communication with the Eligibility team will be sent to the workers responsible for confidential cases rather than to the main ACCSS mailbox.

If questions and/or concerns arise regarding the possibility of a conflict of interest during case management or at any time throughout the life of the case, the staff member will consult with the supervisor immediately. The established guidelines as outlined in this policy will then be followed. Any employee who has reason to believe that another employee is providing a service to a Colorado Works participant that involves payment of governmental funds to the employee or household member of the employee, that employee shall notify the Adams County Workforce and Business Center Local Area Director immediately. In these instances, the county attorney may be consulted to ensure fidelity to the program is maintained; involvement of the county attorney will automatically result in notification to the state office as well.

Case File Maintenance

In all circumstances, these sensitive cases and associated records are kept confidential in a locked filing cabinet, separate from all other case files, and electronic files are password protected. Case management records and system case notes are only accessible to certain staff with a special security profile, authorized and granted by the system administrator. To assure compliance, Quality Assurance (QA) measures are implemented in Adams County to discourage and detect the occurrence of fraud, and include, but are not limited to the following:

- Adams County maintains a separation of functions within the department that are reasonable and required in relation to Department business processes.

- A periodic supervisory sampling of cases, including case reviews, to monitor the determination of client eligibility and the proper calculation and issuance of benefits
- The designated worker assigned to the case reviews and verifies all supporting documentation for information supplied by the applicant; and requests and verifies other pertinent information needed at intake and on an ongoing basis.

Additional Criteria

At no time will a member of the Adams County staff accept any gift worth over \$50, any service, or preferential treatment from a participant. Any such offer will be reported to his/her immediate supervisor.

Signed by:

Eva J. Henry, Chair, Board of Adams County Commissioners, Adams County Colorado Date

Adams County Workforce and Business Center Local Area Director Date

Adams County Human Services Department Director Date