

Ethical Conduct of Division Employees

MAP No. 10-14

Supersedes MAP No. 10-14

Dated: February 29, 1996

State of Alaska

Department of Health & Social Services

Division of Public Assistance

FIELD SERVICES

MANAGEMENT ADMINISTRATIVE PROCEDURES

Approved by:



Chief of Field Services

Date: May 1, 1998

PURPOSE

To provide basic guidelines for ethical conduct of Division employees and to clarify specific areas of concern. This will serve as the policy for the Division of Public Assistance until the DHSS finalizes a department policy.

BACKGROUND

State employees are responsible to maintain a high ethical standard. General guidelines are contained in the Code of Ethics handbook for public employees. Every state employee is expected to be familiar with the contents of this handbook. Employees with the Division of Public Assistance, in working with some of Alaska's low income and often vulnerable citizens, have a special responsibility to those citizens and a responsibility to preserve the division's credibility, and are therefore held to the very highest standards of ethical conduct.

GUIDELINES

Employees have expressed confusion about expectations for conduct in several areas including use of interface data; use of state equipment; working on cases of friends, family, and acquaintances; and off-duty misconduct. This MAP provides clarification and guidelines. It cannot substitute for prudent judgment, and personally held values and ethical standards.

The standards and guidelines detailed and cited in this MAP apply to all employees. It is the duty of each employee to study and become familiar with them.

I. Use of Computer and Interface

Division employees have access to an extensive array of sensitive information via the Eligibility Information System and interfaces with other private and public databases. Confidential information accessed through the computer and computer interfaces may not be used for personal reasons. It may only be used for legitimate business reasons as outlined in policy. All allegations of improper access and/or unauthorized disclosure of such information will be promptly investigated and proof of such may result in dismissal from the Division. Individuals may be subject to civil, criminal, and administrative penalties for the improper receipt, use, and dissemination of that information.

Each employee is required to review Alaska State Statutes, Sec. 11.56.815 and 11.56.860 and Health and Social Services Policy

and Procedure 190-1 with Alaska State Statutes citations, copies of which are attached. Each employee is further required to review the DPA Administrative Procedures Manual [Section 100, Management Administrative Procedures](#) (MAP) Sections reference EIS access, and [MAP 30-11](#) reference confidentiality and disclosure of information. All division employees are also required to read the EIS Security Manual and sign a Terminal Operator Security Clearance Agreement and DOL Confidentiality Acknowledgement.

The Code of Ethics handbook states:

No former or current employee may use or disclose any information gained from state employment when that use or disclosure could result in a personal or financial benefit to the employee (or to a family or household member) unless that information has already been disseminated to the public.

I agree to protect any and all information available to me through interfaces with other agencies, whether the information is on EIS; via direct computer access; from hard copy documents; or other means of communication. This includes, but is not limited to, information from the IRS; Social Security Administration; and the Departments of Labor, Revenue, and Administration.

It concludes:

I also understand that any violation of this agreement may result in disciplinary action, which may include discharge.

Examples of **authorized** interface checks:

- Any information you need to administer public assistance programs for cases assigned to you.
- Access and distribution of general information already disseminated to the public.

Examples of **prohibited** use of computer and interface information:

- A neighbor asks you to check up on an ex-spouse because she knows you have access to DOL records.
- A friend request you check for information concerning a potential tenant.
- Your mother-in-law asks you to check to see if her PFD has been mailed.

- You check to see if your spouse's ex has filed for child support payments.
- You look on Child Support screens for your daughter to find out her CSED caseworker's name.

II. Use of State Equipment:

State employees are prohibited from using state time, resources, equipment, or facilities for their own personal or financial benefit. State equipment includes computers, terminals, copiers, phones, fax machines, vehicles, materials, letterhead, and other items. State time includes scheduled work hours, but not break and lunch periods. State facilities include owned, leased, and rented office and parking space.

Managers may establish policies for the use of equipment that allows personal use but protects the state from costs associated with that use. Employees are responsible to know and comply with the local/regional policy prior to making any personal use of equipment.

Examples of **acceptable** personal uses of state equipment:

- Long distance calls made on own time, charged to own personal phone number, calling card, private 800 number, or collect.
- Transmitting personal fax correspondence on own time if complying with a locally established policy which ensures no cost to the state.
- Personal local calls on own time.
- Organizations such as N.E.W., specifically approved by management, may use a copy machine to copy the NEWSletter, using N.E.W.-supplied paper; or use a fax machine for a small volume of correspondence.

Examples of **unacceptable** personal uses of state equipment:

- Any personal long distance calls which incur a charge to the state, including direct dial, calls to 900 numbers, and calls to other DPA 800 numbers.
- Transmitting long distance direct dial fax correspondence which incurs a charge to the state.
- Receiving fax correspondence unless in compliance with a locally established policy which incurs no cost to the state.

- Accepting collect personal phone calls or calls to a Division 800 number. If such a call is inadvertently accepted, on learning it is personal, the employee must immediately inform the caller of the inappropriateness and disconnect the call. See [MAP 30-12](#).
- Professional associations using state postage and/or stationary to mail their own correspondence.
- Using state letterhead for personal correspondence. Personal correspondence is any, which is not the official position of the department, signed by the person authorized to represent the department in that matter. See Health and Social Services Policy and Procedure 190-8 (attached).

III. Potential Conflict of Interest Cases:

Employees are sometimes requested to provide information to personal acquaintances, family, or friends. If the information is readily available to the general public, then employees may share such information. However, employees are not to be avenues where friends, relatives, etc. have special access to information or receive priority or preferential treatment concerning their cases. Requests for information are to be referred to the client's caseworker. Employees are not to place themselves in a position of providing favoritism. On the reverse side, employees are not to use their state positions in a vindictive manner to damage or gain advantage over acquaintances, family, or friends. Employees must take action to eliminate any perceptions of bias treatment.

Working on cases of friends, family, and personal acquaintances is inappropriate. "Working on," means taking any action in regards to the case, and is not limited to determining eligibility and authorizing benefits. It includes actions such as making collateral contacts, reviewing work history, researching computer screens and interfaces, and requesting information related to the case. Providing to the assigned case worker, information one happens to know about the case due to a personal relationship, is not considered "working on."

Employees are sometimes placed in a situation of having to decide if a potential conflict exists. If any doubt exists, a supervisor should be contacted and a request made to transfer the case or interview. In small offices where options to transfer cases do not exist, staff are expected to process all cases according to standard procedures and not take any actions that are perceived as unfair or granting favoritism.

Additionally, all employees are prohibited from holding “commercial events,” such as sales events at work. Such events are not to be held even during non-work hours. Employees in supervisory positions are prohibited from holding “commercial events” and inviting or including subordinate staff, even if the event is held outside of the office. To do so is a violation of Alaska Statute AS 39.52.120 Misuse of Official Position and the Division’s Management Administrative Procedure (MAP) Section 10-14 Ethical Conduct of Division Employees. While “non-commercial events” such as the selling of Girl Scout cookies is not covered, supervisors are advised to seriously consider the appropriateness of holding such events and how their subordinates will view it.

IV. Off-Duty Misconduct:

DPA employees shall be mindful of their specific identification by the public as the "Division of Public Assistance." The reputation of the Division is influenced to a large degree by public belief in the integrity of its employees. Each employee is expected to make a dedicated effort to conduct their life so they will inspire the confidence and trust of the public. The good conduct and reputation of the employees will help ensure the cooperation and support of the public, the cooperation of our partner agencies, and the mutual cooperation of all employees, which increases the effectiveness of the Division.

Off-duty misconduct can affect the employment status of division staff. Three situations will cause management to investigate and take appropriate action because of off-duty misconduct:

1. If the misconduct interferes with the employee's ability to work.
2. If the misconduct harms the image and/or reputation of the agency in the community or is a negative reflection on the agency.
3. If the misconduct jeopardizes the health or safety of division staff or clients.