

Florida Healthy Kids Corporation

Code of Ethics

2015-16

FLORIDA HEALTHY KIDS CORPORATION

Designation of Executive Staff

Original Effective Date: April 28, 2006
Revised Policy Effective: October 22, 2015

Objective: To establish a definition of "Executive Staff" as identified in the Florida Healthy Kids Corporation ("FHKC" or "Corporation") Plan of Operation.

Policy Statement: "Executive Staff" means any full-time employee of the Corporation whose position title includes the words "Director", "Chief", or "Corporate Counsel".

Process:

1. "Executive Staff" means any full time employee of the Corporation whose position title includes the words "Director", "Chief", or "Corporate Counsel". Additional employees may be designated as "Executive Staff" by the Chief Executive Officer because of access to and acquisition of valuable and confidential information of a special and unique nature relating to FHKC; access to certain financial information; or because the job functions or contacts of that individual could create in persons outside the Corporation a reasonable perception that such employees have influence with the Corporation's decision makers.
2. If due to organizational restructuring, staff changes or position description revisions the Chief Executive Officer determines that additional employees should be designated as "Executive Staff," the Chief Executive Officer shall notify the Board of Directors of any such designations.

FLORIDA HEALTHY KIDS CORPORATION
Background Checks for Designated Corporation Staff

Effective Date: April 28, 2006
Revised Policy Effective: October 22, 2015

Objective: To establish a corporate policy determining the minimum level of criminal background checks required of FHKC employees.

Policy Statement: Prior to employment, all potential FHKC employees shall be subject to a Florida Department of Law Enforcement (FDLE) background check.

In addition to the FDLE background check, FHKC shall also conduct a more extensive criminal background check on the following employees:

1. Executive Staff;
2. Any employee with authority to transfer funds in or out of the Corporation's bank accounts or with access to employee benefit accounts; and,
3. Any person specifically designated by the Chief Executive Officer or FHKC Board of Directors.

Process:

1. All potential candidates for employment shall be screened by the FHKC Human Resources department utilizing the Florida Department of Law Enforcement (FDLE) system prior to the offering of any employment.
2. If a potential candidate has a record in the FDLE system, the Chief Executive Officer shall determine whether or not such activity would preclude the applicant's future employment at FHKC. In cases in which the applicant's record includes conviction of a felony, the Chief Executive Officer may not consider such applicant for employment without the approval of the Executive Committee.
3. In addition, all potential candidates for employment will answer in writing questions intended to reveal any instance in which the candidate has been arrested or convicted in any jurisdiction, including records the candidate may believe to have been expunged or otherwise sealed by a court of competent jurisdiction. In cases in which the applicant's response includes a felony, the Chief Executive Officer may not consider such an applicant for employment without the approval of the Executive Committee.
4. Follow-up background checks may be conducted at any time on any FHKC employee at the Chief Executive Officer's discretion, or at the request of the FHKC Board of Directors.
5. Information revealed during any criminal background check may result in the employee's demotion, re-assignment of duties or other personnel action, including termination, at the discretion of the Executive Committee.

FLORIDA HEALTHY KIDS CORPORATION

Standards of Conduct Policy

Original Effective Date: April 28, 2006
Amended Policy Effective October 22, 2015

Objective: To create a corporate policy establishing standards of conduct designed to prevent Conflicts of Interest for Board Members, Committee Appointees and employees of the Florida Healthy Kids Corporation.

Policy Statement: All FHKC Board Members and Ad-Hoc Board Members (collectively referred to as "Members"), other individuals appointed by the Board Chair as participants on any committee ("Committee Appointees") and all employees shall disclose any relationships, financial or otherwise, with any contractor, vendor or entity that conducts business with FHKC. Additionally, Members, Committee Appointees or employees shall not accept any gifts, including but not limited to, any meal, service or item of value, even de minimis, from any such contractor, vendor or entity that currently conducts business with FHKC or seeks to conduct business with FHKC in the future.

Standards of Conduct:

1. No Healthy Kids Board Member, Committee Appointees or employee acting in his or her official capacity shall, either directly or indirectly, purchase, rent, or lease any realty, goods, or services for FHKC from any business entity in which the Member, Committee Appointees or employee, or the Member's, Committee Appointee's or employee's spouse or child has a material interest or is an officer, partner, director, or proprietor. Nor shall a Member, Committee Appointee or employee, acting in a private capacity, rent, lease, or sell, any realty, goods, or services to the Florida Healthy Kids Corporation.
2. No Member, Committee Appointee or employee shall corruptly use or attempt to use his or her official position, or any FHKC property or resource which may be within his or her trust, or perform his or her official duties, to secure a special privilege, benefit or exemption for himself, herself or others.
3. All Members, Committee Appointees and employees shall fully disclose any potential conflicts of interest upon their appointment or hiring, and annually thereafter, utilizing a form approved by the Corporation's Board of Directors. The disclosure shall be written and include the names of all organizations, entities or individuals, the nature and length of that relationship that may be considered a conflict of interest. FHKC staff shall maintain a current listing of all contractors, vendors and other entities that conduct business with FHKC and provide such listing to Members, Committee Appointees and employees on a regular basis.
4. The Member, Committee Appointee or employee shall recuse himself or herself from any action for which the Member's, Committee Appointee's or employee's vote or influence may provide a benefit to the named organization, entity or individual. The Member, Committee Appointee or employee shall announce his or her recusal prior to any action or vote and such recusal shall be included in the official Minutes of that meeting or in the employee's personnel file.
5. All Members, Committee Appointees and employees shall also disclose any relationship to an applicant or enrollee in the Florida Healthy Kids or Florida KidCare Program. A "relationship" shall be defined as a family member, personal friend, or any current or prior connection to an applicant or enrollee that might create or provide the appearance of a conflict of interest.
6. It is each individual's responsibility to adequately disclose any relationship that could result in a conflict of interest in a timely manner, and to maintain an accurate record of any such relationships.

7. Members, Committee Appointees and employees are prohibited from accepting any individual gifts, including but not limited to, any meal, service or item of value, even de minimis, from any contractor, vendor or entity that is currently providing services to FHKC, or that the Member, Committee Appointee or employee could reasonably know or expect may seek to provide goods or services to FHKC in the future. This prohibition does not apply to gifts exchanged between relatives or family members and Members, Committee Appointee or employees.
8. Additionally, no Member, Committee Appointee, Chief Executive Officer or any Executive Staff member, as defined in the Code of Ethics, shall personally represent another person or entity for compensation before the Board or Corporation for a period of two (2) years following vacation of their position unless employed or retained by a governmental agency or entity. This paragraph does not apply to individuals appointed by or employed with FHKC on or before June 1, 2008, unless expressly agreed upon in writing by the Member, Committee Appointee, Chief Executive Officer or Executive Staff member. Other non-Executive Staff employees may be subject to post-service employment restrictions if such restrictions were agreed upon by both parties prior to employment, and were reduced to writing with a copy placed in the employee's personnel file.
9. Waiver of any of these provisions for a particular employee or Committee Appointee may be granted by the Chief Executive Officer with the approval of the Executive Committee if the Executive Committee determines such a waiver will not adversely impact the Corporation. Any such waiver should detail the provisions waived, be signed by the employee or Committee Appointee and Chief Executive Officer, and a copy kept in the employee's personnel file or the Committee Appointee's corporate file. Any waiver granted under this section shall be reviewed annually by the Executive Committee regarding its continuing status.
10. The Members' and Committee Appointees' annual disclosure statement shall be provided to the appointing official and included in their corporate file. The employee's annual disclosure statement shall be included in the employee's personnel file.
11. FHKC staff shall maintain a current listing of all contractors, vendors and other entities that conduct business with FHKC, and provide such listing to Members, Committee Appointees and employees on a regular basis, but no less frequently than annually.
12. Any employee found to violate any of these standards shall be subject to discipline, up to and including dismissal, at the discretion of the Chief Executive Officer.

Florida Healthy Kids Corporation
Accounts Payable Vendor Listing
Updated: October, 2015

Access Translation Services	Florida Prepaid College
ADP, Inc.	Florida Society of Certified Public Accountants
Adecco	Florida Sterling Council
Advantica	Georgia Florida Burglar Alarm
AFLAC	Glass Pro Shop
Agency for Health Care Administration	Graphateria
American Audio Visual	Hackbarth Delivery Services
American Express	Healthcare District
American Institute of CPAs	ILAND Internet Solutions
American National Ins. Company	Jelly Bean Communications/BowStern
AT&T	Language Line Services
Auto Owners Insurance	Maxim Healthcare Services
Awards 4U	Maximus
Bill 2 Pay/Intuition Systems	Merrill Lynch
Blackbaud (Kintera Fundware)	More Health
Capital Health Plan	My Office Products
CDW Direct, LLC	Neil Brooks Electric Repair
Coaching Options	Pennington Moore & Wilkinson
Comcast	Pitney Bowes Purchase Power
Computer Tutors	Printworks
Copyfax 2000 Inc.	QAS. Ltd
CPI Qualified Plan	Quality Companies
Cypress Data Solutions	Randy Fritz
DATEL Software Solutions	ReadyTalk
De Lage Landen Financial Serv.	Regions Bank
Dell Commercial Credit	Ross Health Actuarial Services
Deltacom	SafeGuard Business Systems
Department of Economic Opportunity	Shred-it Tallahassee
Department of Financial Services	Southern Owners Insurance
Department of Insurance	SunTrust Banks Inc.
Executive Office Supply	Tallahassee Memorial (Employer Assistance)
Earl Bacon Agency	Thomas, Howell, Ferguson
Fatpipe Networks/Ragula System	United Parcel Service
Federal Express	United States Dept of Homeland Security
Florida Institute of Certified Public Managers	United States Postmaster
Fidelity Brokerage Services	University of Florida - ICHIP
Fidelity Investments	Unum Life Insurance
Financial Healthcare Strategies	US Analytics Solutions Group
Florida Bar Bldg Corp	Wells Fargo Bank
Florida Center for Public Manager	Zenith Insurance Company
Florida Department of Revenue	
Florida Insurance School	

**Florida Healthy Kids Corporation
Vendor Listing – Healthcare
Updated: October, 2015**

AMERIGROUP Corporation

Argus Dental
Aetna/Coventry
DentaQuest

MCNA Dental
Sunshine State Health Plan
United Healthcare of Florida
WellCare of Florida, Inc.

**Florida Healthy Kids Corporation
Vendor Listing - Marketing
Updated: October, 2014**

Advantage Point Performance
Bowman Promotional Specialties
Broward County Health Department
Central Florida Healthcare, Inc.
Clothesline
Crayon King
Early Learning Coalition of Bay Co.
Early Learning Coalition of Calhoun Co.
Early Learning Coalition of Holmes Co.
Education Foundation of Alachua Co.
90 Works
Florida Community Health Centers
Florida Dept. of Health Union Co.
Gadsden Co. Healthy Start Coalition
Health Council of Southeast
Healthy Start Coalition of Jeff, Mad & Taylor
IMARCS
Lee Memorial Health System
Miami-Dade AHEC
Northwest FL Comp/Children's Serv
Sachs Communications, Inc.
Sarasota County Health Department
St. Joseph' Children's Hospital
Switchboard of Miami
Telania
United Way of Brevard Co.
United Way of Central Florida
United Way of Florida
United Way of Marion County
University of South Florida

FLORIDA HEALTHY KIDS CORPORATION

**STATEMENT OF CONFLICT OF INTEREST
AND
ATTESTATION REGARDING POST-SERVICE RESTRICTIONS**

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FLORIDA HEALTHY KIDS CORPORATION

661 E. Jefferson Street
2nd Floor, Florida Bar Annex Building
Tallahassee, Florida 32301
(850) 224-5437

ATTESTATION REGARDING CODE OF ETHICS

I, _____, acknowledge receipt of the Florida Healthy Kids Corporation’s Code of Ethics as revised on _____, 2015 and affirm that I have read and understood the provisions of the Florida Healthy Kids Corporation’s Code of Ethics.

Furthermore, as a Board Member/Ad-Hoc Board Member/Committee Appointee, Executive Staff Member (circle appropriate category) of the Florida Healthy Kids Corporation, upon my appointment/employment (circle appropriate category) I agree to disclose any and all personal and business relationships that create a conflict of interest or may present the appearance of a conflict of interest.

If additional applicable relationships arise that may also relate, directly or indirectly, to the Florida Healthy Kids Corporation, I agree to amend this Disclosure Form as soon as possible, but on at least an annual basis.

I understand and accept the Post-Service Restrictions provided for under the Code of Ethics and agree not to personally represent another person or entity for compensation before the Board or Florida Healthy Kids Corporation for a period of two (2) years following vacation of my position unless employed or retained by a governmental entity or agency. I understand that if I was appointed or employed on or before June 1, 2008, this provision does not apply to me unless expressly agreed upon in writing between the Florida Healthy Kids Corporation and myself.

By my signature below, I certify that as a Board Member\Committee Appointee\Employee that I will abide by the Florida Healthy Kids Corporation’s Code of Ethics and will notify the Florida Healthy Kids Corporation immediately of any changes as required under this Code of Ethics.

Member/Committee Appointee/Employee Name: _____
Date Signed _____

Witnessed By: _____
Signature of Witness _____ *Date Witnessed* _____

The following are relationships, business and personal, that may create a conflict of interest that I am hereby disclosing:

Type of Relationship (Business, Personal)	Name of Organization or Individual	Status of Organization or Individual (Current Contractor, Applicant, Enrollee, etc.)	Term of Relationship

FLORIDA HEALTHY KIDS CORPORATION

**Dual Employment Restrictions
Corporation Employees**

Effective Date: January 19, 2006
Revised Effective October 22, 2015

Objective: To create a policy establishing dual employment guidelines for FHKC Employees.

Policy Statements: Healthy Kids employees, whether full-time, part-time or OPS status, may not hold dual employment with any contractor, vendor or other entity that conducts business with FHKC.

Process:

1. All employees shall be provided written notification of this policy prior to hiring. The employee shall certify receipt of such restrictions and the certification shall be placed in the employee's personnel file.
2. All employees shall disclose to their supervisor and Human Resources any dual employment which includes part-time or full-time positions outside of FHKC. Upon notification, Human Resources shall review whether or not any conflict of interest exists and report such findings to the Chief Executive Officer.
3. If an employee is found to hold employment with a current contractor, vendor or other organization that does business or seeks to do business with FHKC, the employee may be subject to discipline, including but not limited to demotion, leave without pay or termination until the dual employment conflict is resolved. Any such employee action shall be at the discretion of the Chief Executive Officer.
4. It is the employee's responsibility to maintain an accurate record with Human Resources of any dual employment.

FLORIDA HEALTHY KIDS CORPORATION

**Post-Service Restrictions
Board Members and Executive Staff**

Effective Date: June 1, 2006, Revised as of October 22, 2015.

Objective: To establish a corporate policy creating post-service employment restrictions for Board Members, Ad-Hoc Board Members, Committee Appointees and Executive Staff.

Policy Statement: No Board Member, Ad Hoc Board Member, Committee Appointee, the Chief Executive Officer, or the Executive Staff shall personally represent another person or entity for compensation before the Board or Corporation for a period of two (2) years following vacation of position unless employed or retained by a governmental agency or entity. This policy shall not be applied to any individual appointed or employed by FHKC on or before June 1, 2008, unless expressly agreed upon in writing by the affected individuals.

Process:

1. Upon appointment, all Board Members, Ad-Hoc Board Members and Committee Appointees shall be informed in writing of the post-service employment restrictions and shall certify receipt of such guidelines.
2. Prior to hiring, Executive Staff shall be informed in writing of the post-service employment restrictions and shall certify receipt of such guidelines.
3. Other FHKC employees may be subject to post-service employment restrictions if such restrictions were agreed upon by both parties prior to employment and were reduced to writing with a copy placed in the employee's personnel file.
4. Waiver of this policy for a particular employee may be granted by the Chief Executive Officer with the approval of the Executive Committee if the Chief Executive Officer determines such a waiver will not adversely impact the Corporation.