



CETPA TEAM MEMBER HANDBOOK

SECTION D: Corporate Compliance / Code of Ethics

www.cetpa.org

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I. CETPA CORPORATE COMPLIANCE PROGRAM

A. Purpose

To establish a policy and procedures that ensures that the Clinic for Education, Treatment and Prevention of Addiction, Inc. (CETPA) complies with all federal, state, and local laws, rules, and regulations and other standards set forth by accrediting organizations and professional licensure requirements. And to ensure that behavioral health services are provided in an environment that documents adherence to established standards of accountability for administration, business, clinical and financial management.

B. Policy

It is the policy of CETPA to ensure corporate integrity, compliance with law and regulation and to prevent fraud, abuse and waste through effective internal compliance practices that provide adequate controls, privacy and security. To further this commitment to compliance and to protect its employees and other affiliated parties, CETPA will implement a Corporate Compliance Program to establish a framework for legal and corporate compliance.

C. Corporate Compliance Program Goals

CETPA's Corporate Compliance Program seeks to meet the following overall goals:

- 1) Maintain and enhance the quality of services.
- 2) Demonstrate a sincere effort to comply with all applicable laws.
- 3) Revise and develop new policies and procedures to enhance compliance.
- 4) Enhance communications with governmental entities to ensure compliance.
- 5) Educate all involved parties to prevent, detect, respond to, report, and resolve conduct that does not conform to applicable laws and regulations, and the organization's ethical standards/Code of Ethical Conduct.
- 6) Establish mechanisms for staff members to ensure that questions and concerns about compliance issues are appropriately addressed.

D. Procedure

i. Organizational Responsibilities:

- 1) By formal resolution, the Board of Directors has delegated overall responsibility for the Corporate Compliance Program to the Executive Director. The Executive Director will formally designate a Corporate Compliance Officer to monitor the organization's corporate compliance and provide periodic and regular reports to the Board of Directors on matters pertaining to the program.
- 2) Corporate Compliance Officer Duties: Corporate Compliance Officer (CCO) shall provide leadership and oversight of the Corporate Compliance Program. The CCO's duties shall include, but not be limited to:
 - a. Serve as the organization's internal and external point of contact for overall corporate compliance issues.
 - b. Develop, implement, and monitor the organization's Corporate Compliance Plan, including internal and external monitoring, auditing, investigative and reporting processes, procedures, and systems.
 - c. Adequately carry forth duties of the Corporate Compliance Officer within a dual reporting role: reporting to the Executive Director as a member of the management team; reporting to the Board as the Compliance Officer.
 - d. Provide specific guidance and ongoing education to staff members who are expected to know and comply with specific laws and guidelines in their regular job duties.

- e. Ensure that mechanisms for preventing, detecting, reporting, and resolving compliance issues are operating in a functional manner.
- f. Ensure that the organization's reporting mechanisms enhance and encourage active participation of all staff members, and provide confidentiality in the reporting process.
- g. Ensure that all suspected violators and/or violations are handled according to documented policy and resolved in a manner that ensures the integrity of the organization's compliance with applicable guidelines and laws.
- h. Work with administrative and clinical leadership to implement remedial actions, and take appropriate corrective and disciplinary actions.
- i. In performance of his/her duties, the CCO shall have direct and unimpeded access to the organization's legal counsel and/or accounting firm, for matters pertaining to corporate compliance.

ii. Team Member Training:

- 1) The Corporate Compliance Program will be fully integrated into the organization's education and training systems through the following processes:
 - a. All new employees will review the Corporate Compliance Program Policy and the organization's Code of Ethical Conduct as part of the new employee orientation process.
 - b. All staff members will review the organization's Code of Ethical Conduct as part of their annual performance review evaluations.
 - c. All staff members will participate, as needed, in ongoing compliance in-service presentations and competency-based trainings.
 - d. Employee exit interviews will include compliance-related questions.

iii. Monitoring and Auditing:

- 1) CETPA will utilize the CCO to ensure that it conducts business in an ethical manner and ensure that any questionable business practices are thoroughly investigated through the organization's written investigation procedures.
- 2) All programs shall implement internal controls, including monitoring activities to ensure compliance with the organization's program.
- 3) Internal self-audits will include, but not be limited to, fiscal services, marketing, contractual services, health and safety practices, use of agency resources, confidentiality, dual relationships, and medical necessity.
- 4) Ongoing monitoring and auditing activities will be reported to the Executive Director for review and appropriate actions, if necessary.

iv. Reporting System:

- 1) CETPA will provide mechanisms to assist staff members and/or agents in reporting suspected violations of possible criminal conduct or violation of the organizational code of ethics by persons within the organization, without fear of retribution.
- 2) Specific processes of reporting suspected violations include the following:
 - a. **Compliance Forms/Letters:** Compliance reporting forms concerning possible violations may be submitted to the corporate compliance officer via secured email or may be placed in a sealed envelope and placed in the CCO's employee box.
 - b. **Telephone:** The number of the CCO will be published and made available for staff to use in submitting concerns regarding possible violations.

v. Investigation Procedures:

- 1) The CCO shall initiate and conduct investigations of all reported alleged incidents.
- 2) Upon receiving information of an alleged incident or violation, the CCO will inform the Executive Director of the allegation.
- 3) All information concerning the alleged incident will be held in strict confidentiality by all parties involved in the process, and will not be shared with any other staff member.
- 4) The CCO will conduct an initial investigation through an interview process with staff members who are assigned to duties and areas related to the alleged violation.
- 5) The CCO will determine from the initial investigation whether the situation would benefit from the involvement of the organization's legal counsel in the investigation process, and recommend such action to any appropriate regulating body, should it be appropriate.
- 6) The employee is notified that there is a complaint and, if warranted by the initial information and involves a direct service situation, may be instructed to not continue direct services with a client until the issue is resolved. The supervisor assisting with the investigation will take primary responsibility for helping the client with access to a clinician that can provide services during the investigation should a change in clinicians be warranted.
- 7) If the suspected violation of the Code of Ethical Conduct involves the executive management of the organization, the organization will enlist assistance from their legal counsel to serve as the final approval of outcome and recommendations.
- 8) The investigation may involve interviews with witnesses and clients, as well as reviewing other relevant information. At all times the client's rights will be respected.
- 9) If at any time during the investigation it is determined that the client's rights have been violated, the appropriate advocacy representative or entity will be immediately contacted to begin their own investigation process according to applicable laws and guidelines.
- 10) If involved, the organization's legal counsel will help ensure the confidentiality and attorney-client privilege of any information which may be compiled, help management focus on critical issues which should be investigated, and help design a strategy for effectively using the findings of the investigation.
- 11) If necessary, following an investigation, the CCO will file a report to any appropriate regulating body that will include a summary of all allegations, results of the investigation, and recommendations for corrective actions.
- 13) The Executive Director, CCO and the supervisor of the staff member(s) involved in the incident will review the recommendations and develop a corrective plan of action.
- 14) Should the investigation indicate a serious violation of policy, the organization's legal counsel will advise in regard to the need to self-report the violation to the appropriate government regulatory agency, and will assist in the process should it be necessary.
- 15) A written report will be compiled and submitted within fourteen (14) days from the notification of the complaint. The report will detail the following:
 - a. The nature of the complaint, including time, date, persons involved, services involved.
 - b. The person whom the complaint is lodged against.
 - c. Results of persons interviewed and investigation of circumstances surrounding the incident.
 - d. A recommendation based on the gathered information.
- 16) The Corporate Compliance Officer will make one of three possible findings in the recommendation:
 - a. **Founded:** The suspected violation of the Code of Ethical Conduct was found to have occurred.
 - b. **Unfounded:** The suspected violation of the Code of Ethical Conduct was found not to have occurred.
 - c. **Undetermined:** It cannot be determined whether or not a violation of the Code of Ethical Conduct has occurred.
- 17) The supervisor will inform the employee, who is the subject of the investigation, of the outcome of the investigation.

- 18) If the finding was unfounded, the paperwork of the complaint and the investigation will be destroyed.
- 19) If the finding was undetermined, the supervisor will adjust the supervision of the employee to a level necessary to ensure that the suspected behavior is not occurring. The employee will be informed of the details and will be actively involved with the supervisor in this process.
- 20) If it is determined that the suspected violation is a client right's violation, then the investigation, notification, and appeal procedure will follow the clients right's policy and procedures.
- 21) When an investigation of ethical complaints are found to have merit, the incident will be reported to the executive management as a critical incident, and will be reviewed within the appropriate format to assist in quality improvement, risk management, and corrective measures.
- 22) The CCO will monitor and evaluate the corrective plan interventions through consistent communication and contact with the supervisor in charge, and will reevaluate the actions/corrections on a monthly basis.
- 23) The CCO will provide updates of the situation to the Executive Director and Board of Directors until the situation has been resolved.
- 24) The incident, investigation, and outcome will be included in the annual corporate compliance report to the Board of Directors.
- 25) The Board of Directors will utilize all information consistent with an incident, investigation, and outcome to recommend revision and development of policy, procedures, and guidelines in the area of corporate compliance.

vi. Enforcement and Discipline:

1) Remedial Actions:

- a. Remedial actions are not disciplinary and are done to correct mistakes, and enhance compliance with the Corporate Compliance Program and State and Federal regulations. In most cases, remedial actions are designed to improve performance of individual staff members. Upon investigating what appears to be behavior requiring remedial actions, the CCO will clarify policies, and will review, and revise if necessary, administrative procedures to prevent future errors.
- b. If remedial action is deemed necessary, the affected staff member will be notified, prior to the initiation of the action, and informed of the concerns regarding his/her performance.
- c. Examples of behaviors that could require remedial action might include but not limited to, failure of an individual to understand and carry out organizational-wide required procedures and policies, inappropriate or improper implementation of the organization's specific corporate compliance policies and procedures, ambiguous communications regarding job performance expectations, or negligent behavior.
- d. Examples of remedial actions may include, but not be limited to staff members required to take part in an education program focused on the problem area, future money management handled in a specifically designated manner, a staff member reassigned, or a change in duty until remediation has successfully corrected the error.

2) Corrective or Disciplinary Actions:

- a. If, upon conclusion of the investigation, it appears that there are genuine compliance concerns, the CCO shall immediately formulate and implement a corrective action plan. The corrective action plan shall be designed to ensure that the specific issue is addressed and, to the extent possible, that similar problems do not occur in other programs or areas.
- b. Examples of corrective actions include, but are not limited to, adopting new policies and procedures to prevent recurrence of the problem, imposing restrictions on certain individuals as to duties they are allowed to perform, discipline of the offending employee and disclosure to appropriate public authorities in case of criminal activity.

vii. Prevention:

1) Education and training will serve as the core of CETPA's prevention efforts to ensure minimal violations of law, ethics, and Code of Ethical Conduct. Prevention efforts will include, but not be limited to:

- a. New employee orientation training.
- b. Training related to the staff members' specific position.
- c. Documentation of competency in required areas through performance appraisals and/or competency based exams.
- d. Routine, targeted, and random audits of systems and medical charts.

II. CETPA CODE OF ETHICAL CONDUCT

A. Introduction

The ethical standards contained in this document shape the culture and norms of the Clinic for Education, Treatment and Prevention of Addiction, Inc. (CETPA)'s administrative operations and clinical practices, and both staff and members of the governing authority will be held fully accountable to these standards. In addition to the specific guidelines contained in the Code of Ethical Conduct, professionals are expected to follow the ethical standards required by their specific licensing and certification boards. The Code of Ethical Conduct is to ensure that all employees' actions reflect a competent, respectful, and professional approach when serving our clients, their families and/or representatives, working with other providers of services, and interacting within the communities we serve. It is expected that staff and members of the governing authority will perform their duties in compliance with all federal, state, and local regulations in accordance with guidelines set forth in this document. Violation of guidelines within the Code of Ethical Conduct can lead to disciplinary actions, including termination of employment.

B. Business Practice

i. Client Records:

- (a) All CETPA Team Members are responsible for the integrity and accuracy of our organization's documents and records, not only to comply with regulatory and legal requirements but also to ensure that records are available to defend our business practices and actions. No one may alter or falsify information on any record or document.
- (b) CETPA Team Members should include sufficient and timely documentation in records to facilitate the delivery of services and to ensure continuity of services provided to clients in the future.
- (c) CETPA Team Members' documentation should protect clients' privacy to the extent that is possible and appropriate and should include only information that is directly relevant to the delivery of services.
- (d) Medical and business documents and records are retained in accordance with the law and our record retention policy. Case records and business documents include paper documents such as letters and memos, computer-based information such as e-mail or computer files on disk or tape, and any other medium that contains information about the organization or its business activities. It is important to retain and destroy records appropriately according to our policy. You must not tamper with records, nor remove or destroy them prior to the specified date.

ii. Privacy and Confidentiality:

- (a) CETPA Team Members should respect clients' right to privacy. CETPA Team Members should not solicit private information from clients unless it is essential to providing services or conducting CETPA Team Members evaluation or research. Once private information is shared, standards of confidentiality apply.
- (b) CETPA Team Members may disclose confidential information when appropriate with valid consent from a client or a person legally authorized to consent on behalf of a client.
- (c) CETPA Team Members should protect the confidentiality of all information obtained in the course of professional service, except for compelling professional reasons. The general expectation that CETPA Team Members will keep information confidential does not apply when disclosure is necessary to prevent serious, foreseeable, and imminent harm to a client or other identifiable person. In all instances, CETPA Team Members should disclose the least amount of confidential information necessary to achieve the desired purpose; only information that is directly relevant to the purpose for which the disclosure is made should be revealed.
- (d) CETPA Team Members should inform clients, to the extent possible, about the disclosure of confidential information and the potential consequences, when feasible before the disclosure is made. This applies whether CETPA Team Members disclose confidential information on the basis of a legal requirement or client consent.

- (e) When CETPA Team Members provide counseling services to families, couples, or groups, CETPA Team Members should seek agreement among the parties involved concerning each individual's right to confidentiality and obligation to preserve the confidentiality of information shared by others. CETPA Team Members should inform participants in family, couples, or group counseling that CETPA Team Members cannot guarantee that all participants will honor such agreements.
- (f) CETPA Team Members should not discuss confidential information in any setting unless privacy can be ensured. CETPA Team Members should not discuss confidential information in public or semipublic areas such as hallways, waiting rooms, elevators, and restaurants.
- (g) CETPA Team Members should protect the confidentiality of clients during legal proceedings to the extent permitted by law. When a court of law or other legally authorized body orders CETPA Team Members to disclose confidential or privileged information without a client's consent and such disclosure could cause harm to the client, CETPA Team Members should request that the court withdraw the order or limit the order as narrowly as possible or maintain the records under seal, unavailable for public inspection.
- (h) CETPA Team Members should transfer or dispose of clients' records in a manner that protects clients' confidentiality and is consistent with state statutes governing records and CETPA Team Members licensure.

iii. Electronic Media

- (a) All communications systems, electronic mail, Internet, Internet access, or voice mail are the property of the organization and are to be primarily used for business purposes. Highly limited reasonable personal use of the CETPA communications systems is permitted; however, you should assume that these communications are not private. Participant or confidential information should not be sent through email or the Internet until such time that its confidentiality can be assured.
- (b) CETPA reserves the right to periodically access, monitor, and disclose the contents of e-mail, and voice mail messages. Access and disclosure of individual employee messages may only be done with the approval of the Corporate Compliance Officer.
- (c) CETPA Team Members may not use internal communication channels or access to the Internet at work to post, store, transmit, download, or distribute any threatening; knowingly, reckless, or maliciously false; or obscene materials including anything constituting or encouraging a criminal offense, giving rise to civil liability, or otherwise violating any laws. Additionally, these channels of communication may not be used to send chain letters, personal broadcast messages, or copyrighted documents that are not authorized for reproduction; nor are they to be used to conduct a job search or open misaddressed mail.
- (d) CETPA Team Members who abuse our communications systems or use them excessively for non-business purposes may lose these privileges and be subject to disciplinary action.

iv. Financial Reporting and Records

- (a) We have established and maintained a high standard of completeness in the documentation and reporting of all financial records. These records serve as a basis for managing our business and are important in meeting our obligations to participants, staff, suppliers, and others. They are also necessary for compliance with tax and financial reporting requirements.
- (b) All financial information must reflect actual transactions and conform to generally accepted accounting principles. No undisclosed or unrecorded funds assets may be established. CETPA maintains a system of internal controls to provide reasonable assurances that all transactions are executed in accordance with management's authorization and are recorded in a proper manner so as to maintain accountability of the organization's assets.

v. Billing

CETPA will maintain audit trails to ensure that services billed reflect services provided. Services will be billed at contracted rates only, and appropriate codes will be used to accurately reflect not only services provided but also the credentials of the service provider. Any intentional misrepresentation of services provided and/or billed will result in disciplinary action.

vi. Conflict of Interest

All CETPA team members are expected to disclose any business transactions or relationship that might be construed as a conflict of interest. Further, he/she shall not participate in any decision-making that has the potential to benefit him/her.

vii. Marketing:

- (a) CETPA will conduct marketing practices in an honest and factual manner. Marketing materials and practices will in no way mislead the public or misrepresent Clinic for Education, Treatment and Prevention of Addiction, Inc.'s abilities to provide services. Clinic for Education, Treatment and Prevention of Addiction, Inc. will not claim any service outcomes unless represented by valid and reliable outcome data and/or research studies.
- (b) CETPA will utilize clear and consistent methods of communicating information to consumers, family members, third-party entities, referral sources, funding sources, and community members, and will exhibit sensitivity to the educational and reading levels of all persons when distributing information.
- (c) CETPA will not utilize monetary rewards or gifts to any potential consumer of services in an attempt to entice them to enter programs.
- (d) CETPA will utilize stipends as permitted by laws and regulations in order to collect data for federal funding agencies or other funding sources. This will be in accordance to grant requirements.

C. Service Delivery

i. Commitment to Clients:

CETPA Team Members' primary responsibility is to promote the wellbeing of the clients we serve. In general, clients' interests are primary. However, CETPA Team Members' responsibility to the larger society or specific legal obligations may on limited occasions supersede the loyalty owed clients, and clients should be so advised. CETPA Team Member's will adhere to the client's rights, responsibilities, confidentiality, and grievance procedures. **See samples at the end of the section.**

ii. Informed Consent:

- (a) CETPA Team Members should provide services to clients only in the context of a professional relationship based, when appropriate, on valid informed consent. CETPA Team Members should use clear and understandable language to inform clients of the purpose of the services, risks related to the services, limits to services because of the requirements of a third-party payer, relevant costs, reasonable alternatives, clients' right to refuse or withdraw consent, and the time frame covered by the consent. CETPA Team Members should provide clients with an opportunity to ask questions.
- (b) In instances when clients are not literate or have difficulty understanding the primary language used in the practice setting, CETPA Team Members should take steps to ensure clients' comprehension. This may include providing clients with a detailed verbal explanation or arranging for a qualified interpreter or translator whenever possible.
- (c) In instances when clients lack the capacity to provide informed consent, CETPA Team Members should protect clients' interests by seeking permission from an appropriate third party, informing clients consistent with the clients' level of understanding. In such instances CETPA Team Members should seek to ensure that the third party acts in a manner consistent with clients' wishes and interests. CETPA Team Members should take reasonable steps to enhance such clients' ability to give informed consent.
- (d) In instances when clients are receiving services involuntarily, CETPA Team Members should provide information about the nature and extent of services and about the extent of clients' right to refuse service.

- (e) CETPA Team Members who provide services via electronic media (such as computer, telephone, radio, and television) should inform recipients of the limitations and risks associated with such services.
- (f) CETPA Team Members should obtain clients' informed consent before audio taping or videotaping clients or permitting observation of services to clients by a third party.

iii. Interruption of Services:

CETPA Team Members should make reasonable efforts to ensure continuity of services in the event that services are interrupted by factors such as unavailability, relocation, illness, disability, or death.

iv. Cultural Competence and Social Diversity:

- (a) CETPA Team Members should understand culture and its function in human behavior and society, recognizing the strengths that exist in all cultures.
- (b) CETPA Team Members should have a knowledge base of their clients' cultures and be able to demonstrate competence in the provision of services that are sensitive to clients' cultures and to differences among people and cultural groups.
- (c) CETPA Team Members should obtain education about and seek to understand the nature of social diversity and oppression with respect to race, ethnicity, national origin, color, sex, sexual orientation, gender identity or expression, age, marital status, political belief, religion, immigration status, and mental or physical disability.

v. Referral for Services:

- (a) CETPA Team Members should refer clients to other professionals when the other professionals' specialized knowledge or expertise is needed to serve clients fully or when CETPA Team Members believe that they are not being effective or making reasonable progress with clients and that additional service is required.
- (b) CETPA Team Members who refer clients to other professionals should take appropriate steps to facilitate an orderly transfer of responsibility. CETPA Team Members who refer clients to other professionals should disclose, with clients' consent, all pertinent information to the new service providers.
- (c) CETPA Team Members are prohibited from giving or receiving payment in the form of gratuities, special favors, financial, sexual or otherwise for a referral.

vi. Receiving Gifts from Clients:

Gifts from clients and/or their families should be discouraged. Under no circumstances may you solicit a personal gift from a client. However, in limited circumstances you may accept a gift or gift certificate if the value of such is \$25.00 or less. Under no circumstances may a gift of cash or cash equivalent (such as a check) be accepted. However, due to the giving nature of the Latino culture we serve, there may be times when a Team Member is in doubt as to whether or not a gift should be accepted. These situations should then be taken to the Team Member's immediate supervisor for clarification with the CCO.

vii. Sexual Relationships:

- (a) CETPA Team Members should under no circumstances engage in sexual activities or sexual contact with current clients, whether such contact is consensual or forced.
- (b) CETPA Team Members should not engage in sexual activities or sexual contact with clients' relatives or other individuals with whom clients maintain a close personal relationship when there is a risk of exploitation or potential harm to the client. Sexual activity or sexual contact with clients' relatives or other individuals with whom clients maintain a personal relationship has the potential to be harmful to the client and may make it difficult for the CETPA Team Member and client to maintain appropriate professional boundaries.

- (c) CETPA Team Members should not engage in sexual activities or sexual contact with former clients because of the potential for harm to the client. If CETPA Team Members engage in conduct contrary to this prohibition or claim that an exception to this prohibition is warranted because of extraordinary circumstances, it is the CETPA Team Member—not their clients—who assume the full burden of demonstrating that the former client has not been exploited, coerced, or manipulated, intentionally or unintentionally.
- (d) CETPA Team Members should not provide clinical services to individuals with whom they have had a prior sexual relationship. Providing clinical services to a former sexual partner has the potential to be harmful to the individual and is likely to make it difficult for the CETPA Team Member and individual to maintain appropriate professional boundaries.
- e) In the event that an individual with whom a CETPA Team Member has had a close, personal relationship presents him/herself for treatment, it is the responsibility of that Team Member to disclose such relationship to their immediate supervisor who in turn will inform the CCO for appropriate action, if any, prior to helping that individual.

vii. Physical Contact:

CETPA Team Members should not engage in physical contact with clients when there is a possibility of psychological harm to the client as a result of the contact (such as cradling or caressing clients). CETPA Team Members who engage in appropriate physical contact with clients are responsible for setting clear, appropriate, and culturally sensitive boundaries that govern such physical contact. In the event that CETPA utilizes new therapies that involve physical contact, CETPA will inform the client prior to beginning the therapy about potential physical or psychological risks and obtain signed consent from the client for participating in such therapies. The CETPA Team Member must be trained in that specific type of therapy before offering or providing it to the client.

ix. Sexual Harassment:

CETPA Team Members should not sexually harass clients. Sexual harassment includes sexual advances, sexual solicitation, requests for sexual favors, and other verbal, visual or physical conduct of a sexual nature.

x. Derogatory Language:

CETPA Team Members should not use derogatory language in their written or verbal communications to or about clients. CETPA Team Members should use accurate and respectful language in all communications to and about clients.

D. Workplace Conduct and Employment Practices (Human Resources)

i. Respect:

- (a) CETPA Team Members should treat colleagues with respect and should represent accurately and fairly the qualifications, views, and obligations of colleagues.
- (b) CETPA Team Members should avoid unwarranted negative criticism of colleagues in communications with clients or with other professionals. Unwarranted negative criticism may include demeaning comments that refer to colleagues' level of competence or to individuals' attributes such as race, ethnicity, national origin, color, sex, sexual orientation, gender identity or expression, age, marital status, political belief, religion, immigration status, and mental or physical disability.

ii. Confidentiality:

CETPA Team Members should respect confidential information shared by colleagues in the course of their professional relationships and transactions. CETPA Team Members should ensure that such colleagues understand CETPA Team Members' obligation to respect confidentiality and any exceptions related to it.

iii. Sexual Relationships:

- (a) CETPA Team Members who function as supervisors or educators should not engage in sexual activities or contact with supervisees, students, trainees, or other colleagues over whom they exercise professional authority.
- (b) CETPA Team Members should avoid engaging in sexual relationships with colleagues when there is potential for a conflict of interest. CETPA Team Members who become involved in, or anticipate becoming involved in, a sexual relationship with a colleague have a duty to transfer professional responsibilities, when necessary, to avoid a conflict of interest, this should be reported to their immediate supervisor and to the COO.

iv. Sexual Harassment:

CETPA Team Members should not sexually harass supervisees, students, trainees, or colleagues. Sexual harassment includes sexual advances, sexual solicitation, requests for sexual favors, and other verbal or physical conduct of a sexual nature.

v. Unethical Conduct of Colleagues:

- (a) CETPA Team Members should take adequate measures to discourage, prevent, expose, and correct the unethical conduct of colleagues.
- (b) CETPA Team Members should be knowledgeable about established policies and procedures for handling concerns about colleagues' unethical behavior. CETPA Team Members should be familiar with national, state, and local procedures for handling ethics complaints. These include policies and procedures created by CETPA Team Members, licensing and regulatory bodies, employers, agencies, and other professional organizations.

vi. Substance Abuse and Mental Acuity

- (a) To protect the interests of staff and participants, we are committed to an alcohol and drug-free work environment. All employees and sub-contractors must report for work free of the influence of alcohol and illegal drugs. Reporting to work under the influence of any illegal drug or alcohol, having an illegal drug in your system, or using, possessing, or selling illegal drugs while on CETPA work time or property may result in immediate termination. CETPA's employment requires annual random drug testing as a means of enforcing this policy.
- (b) It is also recognized that individuals may be taking prescription drugs, which could impair judgment or other skills required in job performance. It is not acceptable to report to work under the influence of a prescribed narcotic or other medicine that may impair your functioning. Team Members should report to their supervisors if they are taking any potential mood altering medication. If you have questions about the effect of such medication on your performance, consult with your supervisor.
- (c) Employees who are arrested and convicted for off the job drug/alcohol activity may be considered in violation of this policy. In determining what action to take, CETPA will consider the nature of the charges, the employee's present job assignment, the employee's record with the Agency, the impact of the employee's conviction on CETPA's ability to maintain efficient and productive operations and any other factor which CETPA deems relevant under the circumstances. The Team Member must present for a clinical evaluation to determine if the cause of the alcohol/drug use consequence be substance abuse or addiction, CETPA will take all reasonable steps to first offer treatment to the Team Member.

vii. Health and Safety

All CETPA Team Members must comply with all government regulations and rules and with CETPA policies or required facility practices that promote the protection of workplace health and safety. Our policies have been developed to protect you from potential workplace hazards. You should become familiar with and understand how these policies apply to our specific job responsibilities

and seek advice from your supervisor or the site Safety Officer whenever you have a question or concern. It is important for you to advise your supervisor and the Compliance Officer for the site of any serious workplace injury or any situation presenting a danger of injury so that timely corrective action may be taken to resolve the issue. All situations of this type will be reported to the Human Resources Coordinator immediately.

viii. Environmental Compliance

- (a) It is our policy to comply with all environmental laws and regulations as they relate to our organization's operations. We will comply with all environmental laws and operate each of our facilities with the necessary permits, approvals, and controls. We will diligently employ the proper procedures with respect to handling and disposal of hazardous and bio-hazardous waste, including but not limited to medical waste.
- (b) In helping CETPA comply with these laws and regulations, we will adhere to all requirements for the proper handling of hazardous materials. You should immediately alert your supervisor to any situation regarding the discharge of a hazardous substance, and improper disposal of medical waste.

E. Professional Practice

i. Supervision and Consultation:

- (a) CETPA Team Members who provide supervision or consultation should have the necessary credentials, knowledge and skill to supervise or consult appropriately and should do so only within their areas of knowledge and competence.
- (b) CETPA Team Members who provide supervision or consultation are responsible for setting clear, appropriate, and culturally sensitive boundaries.
- (c) CETPA Team Members should not engage in any dual or multiple relationships with supervisees in whom there is a risk of exploitation of or potential harm to the supervisee.
- (d) CETPA Team Members who provide supervision should evaluate supervisees' performance in a manner that is fair and respectful.

ii. Performance Evaluation:

CETPA Team Members who have responsibility for evaluating the performance of others should fulfill such responsibility in a fair and considerate manner and on the basis of clearly stated criteria.

iii. Continuing Education and Staff Development:

CETPA Team Members administrators and supervisors should take reasonable steps to provide or arrange for continuing education and staff development for all staff for which they are responsible. Continuing education and staff development should address current knowledge and emerging developments related to CETPA Team Members practice and ethics.

iv. Competence:

- (a) CETPA Team Members should accept responsibility or employment only on the basis of existing competence or the intention to acquire the necessary competence.
- (b) CETPA Team Members should strive to become and remain proficient in professional practice and the performance of professional functions. CETPA Team Members should critically examine and keep current with emerging knowledge relevant to CETPA Team Members. CETPA Team Members should routinely review the professional literature and participate in continuing education relevant to CETPA Team Members practice and CETPA Team Members ethics.

v. Discrimination:

CETPA Team Members should not practice, condone, facilitate, or collaborate with any form of discrimination on the basis of race, ethnicity, national origin, color, sex, sexual orientation, gender

identity or expression, age, marital status, political belief, religion, immigration status, or mental or physical disability.

vi. Private Conduct:

CETPA Team Members should not permit their private conduct to interfere with their ability to fulfill their professional responsibilities.

vii. Dishonesty, Fraud, and Deception:

CETPA Team Members should not participate in, condone, or be associated with dishonesty, fraud, or deception.

viii. Impairment:

- (a) CETPA Team Members should not allow their own personal problems, psychosocial distress, legal problems, substance abuse, or mental health difficulties to interfere with their professional judgment and performance or to jeopardize the best interests of people for whom they have a professional responsibility.
- (b) CETPA Team Members whose personal problems, psychosocial distress, legal problems, substance abuse, or mental health difficulties interfere with their professional judgment and performance should immediately seek consultation and take appropriate remedial action by seeking professional help, making adjustments in workload, terminating practice, or taking any other steps necessary to protect clients and others.

F. Procedures for Investigating and Acting on Violations of the Code of Ethical Conduct:

- (a) When any client, family member, authorized representative, advocate or other person believes that an ethical violation has occurred within the operations of the organization, they may report such suspicion directly to any employee, or management staff.
- (b) When employees believe a violation of the Code of Ethical Conduct has occurred they are obligated to report the violation in one of the following ways:
 - 1. Immediate notification of the incident or violation through the organization's corporate compliance program and reporting mechanisms.
 - 2. Immediate reporting to their supervisor or to corporate compliance officer if the suspected violation involves their supervisor.
- (c) Supervisors who have been informed of a suspected violation are required to immediately inform the corporate compliance officer of the suspected violation.
- (d) If the violation involves a direct and immediate threat to the safety of a client, staff member, or visitor, employees are obligated to report the alleged violation immediately to their supervisor.
- (e) Staff is required to report any suspected violation of the Code of Ethical Conduct; however, they are not required to investigate or know for certain that a violation has occurred.
- (f) Once the questionable behavior has been brought to the attention of the supervisor or reported through the corporate compliance procedures, staff reporting the situation will no longer have a responsibility for being involved with the investigation other than providing additional information through a requested interview by the investigator.
- (g) Staff must report each suspected violation of the Code of Ethical Conduct separately, should a violation that has been reported occur again.

(h) When any suspected violation of the Code of Ethical Conduct is reported to a supervisor, or the corporate compliance officer. The corporate compliance officer will begin an investigation of the matter immediately. While investigating the complaint, the following issues should be considered and action taken depending on the situation:

1. Is any client in any harm or potential harm because of this behavior?
2. Does the complaint require immediate action to remove the employee from contact with a client?
3. Does the complaint put CETPA or its employee in a potentially liable situation that needs legal consultation?

(i) Code of Ethical Conduct investigations will follow the guidelines outlined in CETPA's Corporate Compliance Policy and Procedure.

(j) CETPA believes in the importance of ethical practices within the organization. Any employee who reports waste, fraud, abuse or any other questionable practices will not be subject to reprisal by management of the organization. To assure that reprisal is not used, the organization's governance authority will serve as advocates for any employee who reports questionable practices. The corporate compliance officer will provide assurance and oversight that there are no adverse actions toward the employee.

I certify that I have read CETPA's Corporate Compliance Program and Code of Ethical Conduct. I agree specifically to act in accordance with the policies of CETPA set forth in that document and understand that I may be subject to disciplinary action and/or termination for violating those policies or failing to report violations of those policies.

Team Member's Signature

Print Name

Date

**THIS PAGE MUST BE SIGNED AND RETURNED
TO HUMAN RESOURCES DEPARTMENT.**
