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**Let’s Talk About It Community Mental Health Services Inc. Code of Ethics**

INTRODUCTION

Let’s Talk About It Community Mental Health Services Inc. has revised its Code of Ethics to include a more expansive array of ethical responsibilities that are standards for Let’s Talk About It Community Mental Health Services Inc. employees.

**Section 1- The Role of the Child Welfare Professional**

**Section 2- Corporate Responsibility**

The expanded areas now include ethics that address:

Corporate Responsibility

Business Practices

Marketing Practices

Contractual Relationships

Conflict of Interest

Exchange of Gifts, Money, Gratuities

Personal Fund Raising

Personal Property

Setting Boundaries

Witnessing of Documents

Notary Public

The Chief Administrator

Professional Responsibility

Personal Behavior

Waste, Fraud, Abuse other Wrongdoing

Procedures to Deal with Allegations of Violations of the Code of Ethics

Reporting, Investigation, Acting on Violation, Documenting the Investigation, Monitoring

Prohibiting Retaliation Against Whistleblowers

Education on Ethical Codes of Conduct

Advocacy

Corporate Citizenship

**Mission:** Empowering Families One Child at a Time.

**Vision:** Changing Lives and Communities One Child at a Time.

Let’s Talk About It Community Mental Health Services Inc. will educate each person placed in our care, teaching the life skills necessary to make wise decisions and to become a productive member of society.

**Overview:** Let’s Talk About It Community Mental Health Services Inc. has a private & non-profit agency for abused and neglected children. LTAI operates two (2) separate programs/services in Kalamazoo, Michigan. Kalamazoo is a small community in West Michigan, Kalamazoo County.

The inception of LTAI was in 2002. Kimberly Thorpe LMSW opened Let’s Talk About it Community Mental Health Services Inc. as a private practice in counseling. Counseling services were provided to indigent families, single mothers, couples and teens.

In 2007 the counseling program was discontinued and the Girls’ Home licensed for 15 girls was opened in Kalamazoo, MI. The first girls’ home had the capacity to server 15 girls. We initially provided services for teen girls only, until we received an influx of pregnant teen girls. Licensing requested that the teen girls program serve teen girls only. Therefore we discontinued admitting pregnant teens in this program.

In 2009 we opened a teen mother/baby program in Kalamazoo, MI. for pregnant and parenting teen girls only. We were licensed for 3 teen moms and 3 babies. Unfortunately, this program was not granted a contract and therefore not sustainable. We made a decision to discontinue the services in 2013.

In 2012 we opened a Child Placing Agency. We offered IL program (housing and case management) services to teens ages 17 to 21. This program was discontinued in 2014.

In 2013 We moved the first girls home program (licensed for 15 girls) to a new location and downsized the capacity from 15 girls to 6 girls. To date we have two (2) residential programs. Both programs are licensed for 6 youth. The girls home is licensed for 6 girls and the boys home is licensed for 6 boys. Both programs are located in Kalamazoo, MI. Both programs are funded by the state perdiem received for services rendered.

**PREAMBLE**

Society values each child’s right to have basic needs for survival and development met and each child’s natural right to live with his/her parents. Children have a right to a stable home environment that provides for their safety, nurtures their development and promotes a sense of belonging. Society also values each parent’s natural right to rear his/her child, but through its child welfare laws, defines certain situations in which the parent’s rights can be limited so that the child can be protected. Society delegates to the child welfare field and to those who become members of the field the authority to intervene in the lives of families with the goals of ensuring the safety of abused and neglected children, assisting parents in meeting minimum parenting standards, and planning alternative permanent care when parents are incapable of or unwilling to meet those standards.

The child welfare professional is a person who functions in a societally sanctioned decision making capacity for neglected and/or abused children and their families.When individuals accept the role of child welfare professional and the delegated authority inherent in that role, they publicly acknowledge having the professional responsibilities which accompany that authority. Society and agency youths, therefore, have legitimate expectations about the nature of professional intervention as it occurs in one-on-one professional/youth interactions, in the management and administration of those providing intervention, and in policy decision-making.

Because of their special knowledge and authority, all professionals are in a position of power in inherently unequal relationships with their youths. Their youths and society must be able to trust that child welfare professionals are working with their youths’ interests in mind with no element of disrespect, punishment, or personal bias. Child welfare professionals must behave in such a manner as to ensure not only that their delegated authority is exercised appropriately but that their youths and society perceive their use of authority as appropriate.

This Code of Ethics sets forth ethical principles which should be considered by child welfare professionals whenever ethical judgment must be exercised in specific situations and which should become habitual guides to daily conduct. It sets standards of behavior to be adhered to in relationships between professionals and their youths, colleagues, supervisors, foster parents, the court, employees, the child welfare field, and society. Its purpose is to assist in identifying the many and often competing values and responsibilities present in practice issues so that appropriate consideration is given to each value and responsibility in the decision-making process.

It is understood that ethical judgments are made by individuals who bring their personal values, culture, and experiences to the decision-making process. By making public the values and ethical standards shared by child welfare professionals, this code will assist in making ethical decisions more consistent and objective and will reinforce child welfare professionals’ accountability to society and to those individuals with whom they have professional relationships.

**SECTION 1- THE ROLE OF THE CHILD WELFARE PROFESSIONAL**

**Mandated Reporting**

The law requires that mandated reporters are always required to report suspected child abuse and neglect to the Department of Health and Human Services. The report must be made directly to the Department of Health and Human Services (DHHS). There are civil and criminal penalties for a mandated reporter’s failure to make a report. Likewise, there is a civil and criminal immunity for someone making a report in good faith.

The Child Protection law requires mandated reporters to make an immediate verbal report to DHHS upon suspecting child abuse and neglect, followed by a written report within 72 hours after making the oral report. The reporter is not expected to investigate the matter. Mandated reporters must also notify the head of their organization of the report. Reporting the suspected allegations of child abuse and/or neglect to the head of the organization does NOT fulfill the requirement to report directly to DHHS. One report from an agency shall be considered adequate to meet the reporting requirement. A member of the employees of an agency shall not be dismissed or otherwise penalized for making a report required by this act for cooperating in an investigation.

The verbal report will include the following information, if available:

* Primary caretaker’s (parent and/or guardian) name and address.
* Names and identifying information for all household members, including the alleged victim and perpetrator, if known.
* Birth date and race of all members of the household, if known.
* Whether the alleged perpetrator lives with the child.
* The address where the alleged incident happened, if different than the home address.
* Statements of the child’s disclosure and context of the disclosure.
* History of the child’s behavior.
* Why child abuse and/or neglect is suspected.

Within 72 hours of making the verbal report, mandated reporters must file a written report as required in the Child Protection Law. DHHS encourages the use of Report of Suspected or Actual Child Abuse or Neglect (DHHS-3200) form, which includes all the information required under the law. Mandated reporters must also provide a copy of the written report to the head of their organization. One report from an organization will be considered adequate to meet the law’s reporting requirement. **Mandated reporters cannot be dismissed or otherwise penalized for making a report required by the Child Protection Law or for cooperating with an investigation.** Even though the written process may seem redundant, the written report is used to document verbal reports from mandated reporters.

**Confidentiality Regarding Mandated Reporting**

Strict *state and federal* confidentiality laws govern Children’s Protective Services (CPS) investigations. The identity of a reporting person is confidential under the law. The identity of a reporting person is subject to disclosure only with the consent of that person, by judicial process, or to those listed under Section 5 of the Child Protection Law (MCL 722.625). The alleged perpetrator may infer from the information in the report who made the complaint and confront mandated reporters, however, CPS will not disclose the identity of a reporting person.

**Mandated Reporter Hotline**

If a mandated reporter is dissatisfied with the response by DHHS, the mandated reporter may contact the Mandated Reporter Hotline at **855-444-3911**.

**YOUTH SELF-DETERMINATION**

The mandated nature of the child welfare professional/youth relationship limits the options available to youths, but does not eliminate their right to self-determination. Youth self-determination refers to the youth’s right to make self-determined choices and to freely act upon those choices without undue influence or coercion. It also refers to the youth’s right to receive information necessary to make a self-determined choice.

Please see the NASW Code of Ethics for additional information: https://www.socialworkers.org/pubs/code/code.asp

**SECTION 2- CORPORATE RESPONSIBILITY**

**BUSINESS PRACTICES**

Let’s Talk About It Community Mental Health Services Inc. employees must have knowledge of the legal status of persons served. When applicable it is expected that employees provide information to persons served regarding resources related to legal status and help link youths to these resources. Employees must behave in a manner that demonstrates dignity and respect to persons served, employees members, visitors, volunteers, and other stakeholders. Employees must present and maintain a professional decorum with contract agents, their employees, or other associated or third party relations.

The employees of Let’s Talk About It Community Mental Health Services Inc. are expected to be honest and forthright in their communication, and communication about, any relationship, including dating, with any Let’s Talk About It Community Mental Health Services Inc. employee; employee of a funder, collaborative partner, or provider; or other business associate working directly or indirectly with the agency.

Employees must adhere to Let’s Talk About It Community Mental Health Services Inc.’s accessibility policy in the areas of, but not limited to, architecture, environment, attitudes, finances, employment, communication, and transportation; use language that is respectful and professional when communicating with persons served, employees, volunteers, and other stakeholders; not engage in contracts or agreements with outside organizations/agencies on behalf of Let’s Talk About It Community Mental Health Services Inc.s prohibited; consult with their immediate supervisor and refer to them agency’s policy when responding to subpoenas or other legal requests for agency and/or youth records

Employees are not permitted to engage in activities that fall into the category of fraud, waste, abuse, fiscal mismanagement, and/or misrepresentation of organizational funds or the funds of persons served nor are they permitted to act as a witness to documents such as Power of Attorney, guardianship, advance directives, and/or agency contracts without the expressed written approval of the CEO or COO.

It is expected that employees will not intentionally or unintentionally mismanage the resources of the organization or other stakeholders or youths and always behave in a trustworthy manner with those whom they serve.

**MARKETING PRACTICES**

It is expected that Let’s Talk About It Community Mental Health Services Inc. employees behave in a respectful, dignified manner related to all marketing practices including demonstrating dignity and respect to persons served, employees members, visitors, volunteers, and other stakeholders.

Employees must give preference to the mission of the organization over any personal, business, or marketing interest and not take unfair advantage of any professional relationship or exploit others to further their personal, religious, political, or business interests

It is required that employees adhere to Let’s Talk About It Community Mental Health Services Inc.’s accessibility policy in the areas of, but not limited to, architecture, environment, attitudes, finances, employment, communication, and transportation and not use Let’s Talk About It Community Mental Health Services Inc.’s business practices, marketing strategies, or service delivery protocols for personal or professional gains outside of their specific employment role within Let’s Talk About It Community Mental Health Services Inc.. Intentional or unintentional mismanagement of resources is prohibited.

It is expected that employees use language that is respectful and professional when communicating with persons served, employees, volunteers, and other stakeholders and not use any printed, audio, or visual aid materials belonging to Let’s Talk About It Community Mental Health Services Inc. for their personal or professional gain or benefit.

Authorization for representation or act as a spokesperson for Let’s Talk About It Community Mental Health Services Inc. is required by the Chief Executive Officer or Board of Directors.

Any misrepresentation of Let’s Talk About It Community Mental Health Services Inc.’s mission, purpose, goals and objectives are prohibited.

**CONTRACTUAL RELATIONSHIPS**

Let’s Talk About It Community Mental Health Services Inc. acknowledges that a portion of its employment requirements may be met through the employment of temporary and/or contract individuals. The Chief Administrator is responsible for identification and review of employment relationships. The Chief Administrator will review all contracts on an annual basis.

The agency may contract with an individual or firm to perform specific tasks at an hourly rate or project cost. Individuals under contract are not considered employees of the agency, and proper credentials and proof of insurance, as appropriate, are required. The agency may request verification of licensure, certification or accreditation, and/or insurance coverage.

Contractual agreements must be approved and signed by the Chief Executive Officer. The relationship of a contractor to Let’s Talk About It Community Mental Health Services Inc. that of an independent contractor and no benefits, whether fringe benefits or other types of benefits, will be provided as a result of the contractual agreement. Contractual agreements relating to fee schedules, bill rates, payment schedules, selection processes and replacement policies must be negotiated in advance of placement of temporary employees or contractors.

The CEO is the designated Agency representative authorized to enter into any contractual or other legally binding agreement with any type of employment-related agency or business. Payment for services rendered by temporary and/or contract employees may only be paid directly to temporary and contract employees.

Employees of Let’s Talk About It Community Mental Health Services Inc. who may work with an independent contractor are encouraged to report any suspected abuse, neglect, waste, or wrongdoing by the independent contractor to their supervisor, another Manager, and/or the Corporate Compliance Officer.

**SERVICE DELIVERY**

Let’s Talk About It Community Mental Health Services Inc. fosters a person-centered planning philosophy. It is the expectation of the agency that our employees will: ensure that the organization’s person-centered planning philosophy is evident in the service delivery process; ensure that all barriers to accessibility are assessed, addressed, and removed; have knowledge of the legal status of persons served; provide information to persons served regarding resources related to legal status and help link youths to these resources, as needed.

Our employees must utilize good judgment and display the following: avoid conflicts of interest that interfere with the exercise of professional discretion and impartial judgment; understand potential conflicts of interest; inform persons served when a real, or potential, conflict of interest arises (and take reasonable steps to resolve the issue in a manner that makes the persons’ served interest primary and protects the persons’ served interest to the greatest extent possible); recognize and respect the inherent dignity and worth of the person and persons within the persons served care system.

Employees are prohibited from providing services to individuals, with whom they have a personal (including dating, intimate, prior or current sexual) relationship.

At times employees will need to advocate for our youths and challenge social injustice on behalf of their welfare. It is expected that employees recognize the cultural, racial and ethnic importance of human relationships; behave in a trustworthy manner with those whom they serve; practice within their areas of competencies and develop and enhance their professional expertise; maintain and update their professional licenses, credentials, certifications and clinical privileges; respect and promote the rights of persons served to self-determination, and assist persons served in their efforts to identify and clarify their goals.

It is the expectation that our employees will write legibly and use clear, specific and understandable language in the clinical documentation of persons’ served case activities; use clear and understandable language to inform persons served of the purpose of services, and risks related to services, and limits to services, because of the requirements of a third party payer; provide persons served with reasonable access to their records; not use derogatory language in their written or verbal communication to, or about, persons served; practice within their areas of competencies and develop and enhance their professional expertise; use accurate and respectful communication to, and about, persons served; 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; Never encourage a youth to sign blank forms.

Employees are prohibited from discussing a youth’s case information without provisions for relative confidentiality; leaving persons’ served case record information on desks, or in any other unsecured manner, thus violating persons’ served confidentiality; intentionally or unintentionally mismanaging the resources of the organization or other stakeholders.

Employees’ primary goals are to help people in need, address social problems, and support the well being of persons served.

**CONFLICT OF INTEREST**

Let’s Talk About It Community Mental Health Services Inc. employees and representatives will conduct themselves in an ethical and conflict free manner. The agency requires that all employees, paid consultants, Officers and Directors, certified and/or licensed personnel subscribe to and abide by the Let’s Talk About It Community Mental Health Services Inc. Code of Ethics as well as their respective professional ‘Codes of Ethics’.

Let’s Talk About It Community Mental Health Services Inc. prohibits the making or accepting payment or other consideration in exchange for referrals. No board member, employee, volunteer, or paid consultant is permitted to have a direct or indirect financial interest in the asset, earnings, leases, business transactions or professional services of the agency. Preferential treatment is not permitted for members of the board, employees, volunteers, or paid consultants who require services from the agency.

Let’s Talk About It Community Mental Health Services Inc. prohibits steering or directing referrals of applicants or persons served to a private practice or other interest in which a board member, employee, consultant or the immediate families of it are engaged. Practitioners are not permitted to provide private practice from agency location. Practitioners currently employed by Let’s Talk About It Community Mental Health Services Inc. are not permitted to provide therapy to current agency youths in their private practice.

Employees who leave the agency are prohibited from serving any of the agency current or former youths for at least one year from date of leave. Employees who leave the agency are prohibited from establishing and/or maintaining any contact with the agency’s current and/or former youths.

Employees are required to provide ‘full disclosure’ of any potential conflict of interest.

Board members are not permitted to receive honorariums.

**EXCHANGE OF GIFTS, MONEY, GRATUITIES**

No personnel or other persons associated with Let’s Talk About It Community Mental Health Services Inc. will accept gifts of money or material value, favors, remuneration, or other consideration from any youth, individual, or organization that does business with your organization.

Gratuities are not to be accepted in any form.

Gifts from youths of low monetary value are acceptable, whether purchased or handmade, not exceeding a $20 value. Supervisors will be made aware of the gift and approve the gift. If the gift is not approved the supervisor will be responsible to return the gift. Decisions to accept a gift will be based on the therapeutic benefit to the youth.  If a gift is received from a youth or other stakeholder (including but not limited to the, youth’s family, external vendor, or referral source), it could be stated that the gift is turned in to the supervisor and considered to be a donation to the program or organization.

Employees are not to exchange pictures of themselves with youths’, they may receive pictures of youth’s but they are not to be displayed in the agency or in their homes.

**PERSONAL FUND RAISING**

Personnel soliciting funds on behalf of a personal cause (this includes but is not limited to: selling cookies for a daughter in girl scouts, selling candy or wrapping paper for a child’s school, having persons served sell items on behalf of the organization, and allowing persons served to raise funds by appeals to personnel and other persons served) will be allowed to sell funds to employees only. Personnel are prohibited to sell to youths and stakeholders of the agency. Authorization for fund raising must be approved by the employees’ immediate supervisor. The employee must provide materials that are approved or authorized to be placed at the front desk of the facility.    Employees are allowed to solicit for personal fund raising during their bona fide break time provided that it is not done in the presence of youths and not in areas frequented by youths and not disruptive of other employees’ work schedules.  The CEO or the COO have the authority to approve personal fund raising or to make exceptions to the policy.

**PERSONAL PROPERTY**

All personnel shall respect and safeguard the personal property of youths, visitors, and other personnel as well as the property of Let’s Talk About It Community Mental Health Services Inc..  Employees will not use or allow the use of Let’s Talk About It Community Mental Health Services Inc.’s property or equipment for other than activities approved by the organization.  Theft and destruction of property may be addressed through treatment planning (youths), disciplinary action (personnel), and/or by contacting law enforcement, as appropriate.

Let’s Talk About It Community Mental Health Services Inc. is not responsible for personal property that is not safeguarded or is left unattended. Let’s Talk About It Community Mental Health Services Inc. will not be responsible for any employees personal property left on the agency’s premises. The agency will not be responsible for any damage, theft or loss of personal items within the course of employment at Let’s Talk About It Community Mental Health Services Inc.. The agency encourages employees to keep their personal items off the premises.

**SETTING BOUNDARIES**

Let’s Talk About It Community Mental Health Services Inc. has established that there shall be clear, defined lines of authority to assure that decisions and assignments can be made at the proper level, with appropriate participation by employees, and reviewed by proper supervisors. This shall assist with communication flow.

The chain of command shall be adhered to. Communication must go through your immediate supervisor before being submitted to a higher authority. In the event communication with your immediate supervisor is not possible (or an issue is unresolved by the supervisor) then communication with the next higher authority is made. If possible notification shall be given to your immediate supervisor notifying him/her of that action. If the issue is directly related to your supervisor contact the next person above them and so on.

If efforts to resolve an issue are not resolved you must attempt to resolve the issue through contact with the Chief Administrator. If the issue pertains to the Chief Administrator then you will contact the CEO. In the event of the CEO’s absence you will contact the COO.

If allegations of harassment exist then the Chief Administrator must be notified immediately. The decision to circumvent the Chain of Command policy will be at the discretion of the The Chief Administrator Manager, the COO or the CEO unless they are directly involved. If the allegations of harassment pertain to the Chief Administrator then you will contact the CEO. In the event of the CEO’s absence you will contact the COO.

Let’s Talk About It Community Mental Health Services Inc. believes that an environment where employees maintain clear boundaries between employee personal and business interactions is most effective for conducting business. Although this does not prevent the development of friendships or romantic relationships between coworkers, it does establish very clear boundaries as to how relationships will progress during working hours and within the working environment. Individuals in supervisory relationships or other influential roles are subject to more stringent requirements due to their status as role models, their access to sensitive information and their ability to influence others. It is important that employees are aware of these principles and adhere to them.

Employees may date; develop friendships and relationships both inside and outside of the workplace as long as the relationships do not negatively impact work. Any relationship that interferes with the agencies mission, culture of teamwork, work environment or the productivity of employees, will be addressed by their immediate supervisor.

The exception to this relates to supervisors. Anyone employed in a supervisory role needs to be aware of the fact that personal relationships with employees who report to him or her may be perceived as favoritism, misuse of authority, or potentially, sexual harassment. Even if no improper conduct occurs, the relationship may cause gossip, hard feelings, dissatisfaction, and distraction among other employees in the workplace. The relationship may appear to other employees as an inappropriate use of position power.

Let’s Talk About It Community Mental Health Services Inc. does not allow dating between any provider and person served. Employees are not permitted to date foster parents, home providers, birth family/fictive kin/family members of any youths, board members, interns or individuals who have a direct impact on the licensure/contract/rate setting of the agency.

Employees are permitted to date one another as long as they do not have a Superior-Subordinate relationship. Employee’s that date another employee must make their direct supervisor aware of their relationship. Employee’s that marry one another must report this to their immediate Supervisor.

Let’s Talk About It Community Mental Health Services Inc. will employ former youth but not a relative of a current and/or former youth. Applications for employment from immediate family of employees will be considered with other qualified applications when position vacancies occur. Restrictions in job placement will apply if a relative is hired. Immediate family will be hired but not allowed to directly or indirectly supervise or be supervised by a relative. For the purpose of this policy, immediate family includes: spouse, parent, child, sibling, in-law, aunt, uncle, niece, grandparent, grandchild, members of household. This policy also applies to romantic relationships. A person may not be employed in a position or promoted to a position, where as a result of such employment there is a reasonable possibility that a conflict of interest may arise or other problems may occur which would interfere with or undermine the efficient operation of Let’s Talk About It Community Mental Health Services Inc..

**WITNESSING OF DOCUMENTS**

Personnel shall not act as a witness to documents such as Power of Attorney, guardianship, advance directives, and/or agency contracts without the expressed written approval of the COO.  Personnel are authorized to countersign documents such as intake forms, authorizations (release of information form), treatment plans, etc. as directly related to their job duties.

Employees who are certified as Notary Publics may witness documents such as Power of Attorney, guardianship, advance directives, and/or agency contracts for youths, personnel, and other stakeholders in accordance with applicable state laws.  The person who witnesses a document should be neutral and have no financial or other interest involved.

**NOTARY PUBLIC**

Notaries are appointed by and answerable to their states, and they serve the public as official, impartial witnesses to business transactions. Let’s Talk About It Community Mental Health Services Inc. Notaries are accountable to the organization to serve a variety of business goals of the organization.

There will be no fees obtained when an agency employee notarizes a document pertaining to agency business.

Employees who are certified as Notary Publics may witness documents such as Power of Attorney, guardianship, advance directives, and/or agency contracts for youths, personnel, and other stakeholders in accordance with applicable state laws.  The person who witnesses a document should be neutral and have no financial or other interest involved.

Let’s Talk About It Community Mental Health Services Inc. will never request a Notary employee to perform an unlawful Notarial act or waive the requirements for proper Notarization.

The agency will not in any way subject the employee to any pressure or retribution if the Notary employee does not wish to perform or complete an unethical, unlawful Notarial act.

Let’s Talk About It Community Mental Health Services Inc. fully supports and protects its Notarial employees from any pressure or retribution when they refuse to notarize an unethical or unlawful request or if they report illegal or unprofessional behavior displayed by another Notary employee.

The agency will pay for any fees associated with an employee becoming a Notary employee and all fees associated with basic Notary training, continued education, access to reference materials etc.

Appropriate disciplinary action will be taken upon those who display unethical or unprofessional behavior.

**Professional Responsibilities**

Employees shall behave in a manner that demonstrates dignity and respect to persons served, staff members, visitors, volunteers, and other stakeholders.

Employees shall behave in a trustworthy manner with all stakeholders, including but not limited to, persons served, supervisors, co-workers, volunteers, visitors, and funders.

Employees are prohibited from engaging in verbal/sexual harassment, physical abuse or neglect of persons served or persons within the person’s served care system, including person’s served family or friends.

Employees shall use language that is respectful and professional when communicating with persons served, employees, volunteers, and other stakeholders.

Employees shall not falsify agency records, persons’ served records, and/or other documents associated with their employment with Let’s Talk About It Community Mental Health Services Inc..

Employees shall adhere to Let’s Talk About It Community Mental Health Services Inc.’s accessibility policy in the areas of, but not limited to, architecture, environment, attitudes, finances, employment, communication, and transportation.

Employees shall not divulge confidential material or information to unauthorized persons.

Employees shall protect the confidentiality of persons’ served written, verbal and electronic records and other sensitive information.

Employees shall ensure that persons’ served records are stored in a secure location, and that persons’ served records are not available to others who are not authorized to have access.

Employees must be courteous, respectful, and truthful to supervisors, visitors, volunteers, co-workers, persons served, referring workers/agencies, and any and all other persons associated directly or indirectly with Let’s Talk About It Community Mental Health Services Inc.

Employees shall provide services to persons served only in the context of a professional relationship based upon valid and informed consent.

Employees shall not post any information regarding persons served on any social media outlet, e.g. Facebook, Twitter, blogs, etc.

Employees shall not provide services to individuals with whom they have a personal, intimate, including dating, prior or current sexual relationship.

Employees 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.

Employees shall adopt the concept of extended families, kinship care and fictive kin.

Employees shall accept the responsibility to advocate for persons served and protect the community in which our persons serve live against unethical and hypocritical practices by individuals or organizations engaged in social welfare activities.

Employees shall not intentionally or unintentionally mismanage the resources of the organization or other stakeholders.

Employees shall not engage in personal fundraising with persons served or solicit funds from persons served on behalf of a personal cause such as: selling cookies for a daughter in girl scouts; selling candy or wrapping paper for a child’s school; having persons served selling items on behalf of the organization; and allowing persons served to raise funds by appeals to personnel or other persons served.

Employees, as may be appropriate in their role, shall respect and safeguard the personal property of persons served, visitors, and personnel, and all property owned by the organization.

Employees shall not use the organization’s property for personal use.

**THE CHIEF ADMINISTRATOR**

Let’s Talk About It Community Mental Health Services Inc. maintains an at-will employment status. This section in the Code of Ethics under “The Chief Administrator” is not intended to define the organization’s comprehensive “Personnel Policies and Procedures” manual. Please refer to the organization’s “Personnel Policies and Procedures” manual for more detailed information regarding The Human Resource issues.

* All Degreed professional employees must practice within the legal constraints of their state license(s) and adhere to the ethics codes of their profession.
* Employees shall act in a manner that promotes and preserves the professional social work values and the practice standards of clinical social work.
* Employees shall make clear their role when speaking or acting as a private individual rather than as a professional or as a representative of a professional organization.
* When more than one employee is involved in the care of a person served, employees seek to coordinate treatment. They are obligated to address any collaborative issues that are not in the best interest of the person served.

**Personal Behavior**

Employees of Let’s Talk About It Community Mental Health Services Inc. are expected to behave in a manner that demonstrates dignity and respect to persons served, employees members, visitors, volunteers, and other stakeholders. Employees shall be honest and truthful in their documentation, reporting, communicating with their supervisor, coworker, or other management employees within the organization. Employees shall use language that is respectful and professional when communicating with persons served, employees, volunteers, and other stakeholders.

Employees shall adhere to Let’s Talk About It Community Mental Health Services Inc.’s accessibility policy in the areas of, but not limited to, architecture, environment, attitudes, finances, employment, communication, and transportation. Sleeping on the job is prohibited. The use of any controlled substances while on the job, coming to the job, or while doing any related work activities, is strictly prohibited. Engaging in the sale, transfer, or use of alcohol, tobacco, or other drugs, or the abuse of over-the-counter medication, while on duty or on Let’s Talk About It Community Mental Health Services Inc.’s premises, or in any associated activity related directly or indirectly to Let’s Talk About It Community Mental Health Services Inc. is strictly prohibited.

Employees must maintain an acceptable self-appearance. Dress should be in accordance with the job and the dictates of the occasion.

Employees shall not engage in verbal/sexual harassment, physical abuse or neglect of persons served, or persons within the person’s served care system. Employees shall not use nor abuse the personal property of the agency, including vehicles, credit cards, telephones, computers, cell phones, copier machines, or any other equipment or property of Let’s Talk About It Community Mental Health Services Inc. for non Let’s Talk About It Community Mental Health Services Inc.-related activities.

Employees are expected to perform his/her tasks on time, especially those that are a part of his/her job description. Employees shall not intentionally or unintentionally mismanage the resources of the organization or other stakeholders.

It is the policy of Let’s Talk About It Community Mental Health Services Inc. that employees, volunteers, or other stakeholders may not participate in fraud, abuse, waste of resources or other wrongdoing, whether illegal or unethical. Ethical violations and legal/unethical wrongdoing shall be reported. Employees are encouraged to report any suspicion or evidence in the aforementioned areas to their immediate supervisor, The Chief Administrator Manager, or Corporate Compliance Officer. Let’s Talk About It Community Mental Health Services Inc. shall uphold a “no reprisal” approach for employees and volunteers in reporting suspected incidents of waste, fraud, abuse, and other questionable activities and practices, and/or violations of ethical codes.

**Waste**

Waste as the over-utilization of services, (not caused by criminally negligent actions) and the misuse of resources.

Let’s Talk About It Community Mental Health Services Inc. employees will not misuse agency resources.

**Fraud**

Fraud as an intentional act of deception, misrepresentation, or concealment in order to gain something of value. This can include billing for services that were never rendered or billing for services at a higher rate than is actually justified. Fraud can occur when services provided to members are deliberately misrepresented, resulting in unnecessary cost to the program, improper payments to providers, or overpayments.

Let’s Talk About It Community Mental Health Services Inc. employees will not engage in fraudulent activities.

**Abuse**

Abuse is the excessive or improper use of services or actions that are inconsistent with acceptable business and/or medical practice. Abuse refers to incidents that, although not considered fraudulent, may directly or indirectly cause financial loss.

Examples of this may include Double billing: Charging more than once for the same service; Using another person’s Medicare card to get medical care, supplies, equipment, or prescription drugs; Soliciting, offering or receiving bribes, rebates or kickbacks; Dispensing expired drugs; Prescription forging; Resale of drugs on the black market; Billing for services that were not furnished and/or supplies not provided; Altering claim forms and/or receipts in order to receive a higher payment amount; Charging in excess for services or supplies; Providing medically unnecessary services; Billing for items or services that should not be paid for by Medicare.

Let’s Talk About It Community Mental Health Services Inc. employees will not abuse professional practice.

**PROCEDURES TO DEAL WITH ALLEGATIONS OF VIOLATIONS OF THE CODE OF ETHICS**

Let’s Talk About It Community Mental Health Services Inc.’s Corporate Compliance Officer (CCO) will receive all documentation

regarding allegations of violations of the Code of Ethics. The CCO will receive the report, conduct the investigation, record the investigation, and provide feedback and follow up.

Let’s Talk About It Community Mental Health Services Inc. upholds a “no reprisal” concept for employees and volunteers in reporting suspected incidents of questionable activities and practices within the organization.

A “no reprisal” system simply means that employees shall not be subject to any

retaliation, penalties, discrimination, confrontation, or any other type of consequences for making a report.

**Reporting**

Any employees member may report a violation of the Code of Ethics by completing an Incident Report and submitting the form to their supervisor and provide a

copy to the Corporate Compliance Committee. Employees are encouraged to report

the incident within 10 working days. Reports will still be accepted if they are

submitted more than 10 working days after the occurrence.

**Investigation**

The Corporate Compliance Officer (COO), in consultation with the respective

Supervisor and all other parties involved will investigate the report within five (5)

business days of receiving the report, and complete the investigation with a final

report completed within 15 days.

**Acting on Violation**

If there is sufficient evidence, as determined by the investigation, a report and

recommendation will be submitted to the CEO by the Corporate Compliance

Officer (COO). The CEO will facilitate and approve the recommendations of the

CCO, which may include, but not limited to: a number of corrective action

strategies, including training, supervision, and/or disciplinary action.

**Documenting the Investigation**

The Corporate Compliance Officer (COO) will maintain a log of all Code of Ethics

investigations and report same to the CEO on an annual basis. In addition to

maintaining a log, the COO will use the following process:

• Create a separate file for the investigation.

• The investigation file should include:

- The complaint

- The Report of Investigation

The CEO will report to the Board on an annual basis an analysis on Code of Ethics

violations and/or trends and patterns. THE COO will report this under trends and/or patterns in the Quarterly Continuous Quality Improvement Plan.

**Monitoring**

The Corporate Compliance Officer (COO) shall ensure that the Code of Ethics is clearly communicated to employees on an ongoing basis. The methods of communication will be as follows:

* Each new hire, whether full-time, part-time, or contractual, will receive a copy of the Code of Ethics on their first day of employment.
* Each new hire will sign off acknowledging receipt and understanding of Let’s Talk About It Community Mental Health Services Inc.’s Code of Ethics.
* The Code of Ethics will be shared with employees at the agency new employees’ orientation training.
* The Compliance Officer (COO) will monitor trends, patterns, and code violations and

recommend to the CEO additional training or supervision strategies to reinforce

compliance with the Code of Ethics.

# PROHIBITING RETALIATION AGAINST WHISTLEBLOWERS

It is the policy of Let’s Talk About It Community Mental Health Services Inc. to prohibit any type of retaliation against an employee’s person who provides the administration and/or law enforcement officers with any truthful information relating to the commission, or possible commission of a crime and/or federal offense. Let’s Talk About It Community Mental Health Services Inc. fosters a non-reprisal approach for personnel reporting. Employees must report alleged violations of ethics within 24 hours to their immediate supervisor or follow the chain of command for reporting.

Let’s Talk About It Community Mental Health Services Inc. employees and representatives must be aware of their individual responsibility to communicate with the administration of the agency and law enforcement officers any/all information relating to the commission or possible commission of a crime or other federal offense without fear of retaliatory actions.

Employee’s are responsible to communicate with their immediate supervisor and law officers if they become aware of a crime or the possibility of a crime being committed at the agency by the agency’s youths and/or employees.

In order to ensure that youth/employees are safe/protected employees may need to communicate their concerns to the police immediately. Employees are to call the police immediately if in their judgment a youth and/or employees are at imminent risk of harm.

Employee’s may communicate their findings with their immediate supervisor and request the supervisor to communicate with law officials initially. Employees shall document their findings on the Incident Report Form and follow the procedures for reporting an incident.

All reported incidents shall be taken seriously and handled immediately. If the employees member making the report is not satisfied that the incident is being dealt with appropriately and/or immediately they are to communicate their concern verbally and in writing to the Chief Operations Officer and/or Chief Executive Officer as soon as possible. The Chief Executive Officer will inform the agency’s Board of Directors immediately of any/all reports received. The Chief Executive Officer and the Board of Directors will follow up on all reports to ensure that reported issues are resolved appropriately.

Employees may contact The Chief Administrator if they perceive that they are being treated unfairly, negatively and/or are being singled out in any manner because of having made a report.

The Chief Administrator will investigate all violations to the Code of Ethics. Investigations shall be completed within 30 days unless an extension is necessary, all extensions will be noted and provided to the employee in writing.

**Education on Ethical Codes of Conduct for Personnel and Other Stakeholders**

Let’s Talk About It Community Mental Health Services Inc. continues to support training and education for employees to remain in compliance and current in their respective field in order to demonstrate strategies and interventions that are based on accepted practices and current research, evidence-based practice, peer reviewed scientific and health-related publications, clinical practice guidelines, and/or expert professional consensus.

Leadership supports and sponsors online access to learning opportunities and

reference materials through webinars for employees and stakeholders/collaborative partners; agency subscribes to magazine and subscriptions related to relevant fields; agency collaborates with other organizations/schools for in-service workshops and community meetings; and agency supports time off and financial assistance for employees to attend conferences.

The Corporate Compliance Officer (COO) remains current on policies and practices in the field via online training documents and printed publications/books.

**ADVOCACY**

Let’s Talk About It Community Mental Health Services Inc. continues to advocate for persons served, personnel, and other community stakeholders. Let’s Talk About It Community Mental Health Services Inc.’s advocacy efforts include partnering with other organizations and the general community to provide training and education that will reduce the stigma associated with the needs, challenges, diagnoses, and disabilities of our youths. Let’s Talk About It Community Mental Health Services Inc.’s advocacy efforts also include providing oral testimony, and developing and submitting position statements that support the needs of youths and/or the needs for policy revisions at the local, state, and federal levels. Let’s Talk About It Community Mental Health Services Inc. works in collaboration with other organizations to coordinate our advocacy efforts on behalf of not only persons served, but Let’s Talk About It Community Mental Health Services Inc.’s general geographic service area as well. Let’s Talk About It Community Mental Health Services Inc. will continue to demonstrate a commitment and value for advocacy services on behalf of persons served through a number of venues, including the recipient rights process, corporate responsibility strategies, and as a part of ongoing service delivery. The continuum of advocacy services will include from time to time, based upon the changing needs of our youths and the community, the following:

* + Linking youths to local advocacy groups, agencies, and organizations
  + Personal Advocacy: One-on-one advocacy to secure the rights of the persons served.
  + Systems Advocacy: Seeking to change a policy or practice that affects the person served.
  + Legislative Advocacy as permitted by law: Seeking legislative enactments that would enhance the rights of and/or opportunities for the person served.
  + Legal Advocacy: Using the judicial and quasi-judicial systems to protect the rights of the person served.
  + Self-Advocacy: Enabling the person served to advocate on his/her own behalf.

**Corporate Citizenship**

Let’s Talk About It Community Mental Health Services Inc. encourages corporate responsibility at all levels of the organization. Corporate responsibility demonstrates what an organization stands for including its philanthropic, ethical, social, legal, and environmental values. Overall this demonstrates our desired outcomes, expected outcomes and our required outcomes pertaining to our commitment to society.

Corporate responsibility also demonstrates viability, sustainability, equitability and bearability to society at large while assisting in advocating for the persons served; promoting ethical business practices; developing efficiency as an organization; and considering the impact of organizational activities on persons served, personnel, other stakeholders, and the environment.

The participation of employees in corporate responsibility activities requires communication with the CEO and approval from the CEO for corporate responsibility activities.

Let’s Talk About It Community Mental Health Services Inc. has expanded its corporate responsibility statement, as more of our employees are volunteering to support the needs and activities of our youths during and after-work hours. Let’s Talk About It Community Mental Health Services Inc.’s leadership is serving on community Boards, Commissions, Ad-Hoc Committees, and Task Force Groups at the federal, state and local levels.

Let’s Talk About It Community Mental Health Services Inc. supports the involvement of employees in corporate responsibility activities as a way to not only advance the mission, philosophy, values and goals of the organization, but to advocate for the needs, wants, and desires of its youths and the community.

Let’s Talk About It Community Mental Health Services Inc. provides training, consultation, and/or mentoring to organizations and/or individuals that may experience challenges in aspiring to excellence in their business practices and/or services to persons served.

REV: KT 11/2018

Additional Information on Child Welfare Professional Code of Ethics can be found at the following:

The National Association of Social Work Code of Ethics:

<http://www.socialworkers.org/pubs/code/code.asp>

The Principles of Medical Ethics:

<http://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=3&ved=0CDkQFjAC&url=http%3A%2F%2Fwww.psych.org%2FFile%2520Library%2FPractice%2FEthics%2520Documents%2Fprinciples2013--final.pdf&ei=HBUeU_3cGISMyAHE2IDoAw&usg=AFQjCNG1JhRQN7YJf7Y3J4mKuYwu5M7xjQ&bvm=bv.62578216,d.aWc>

American Counseling Association Code of Ethics:

<http://www.counseling.org/knowledge-center/ethics>

Child Welfare League of America Code of Ethics:

<http://www.cwla.org/programs/trieschman/2001fbwPamelaMontgomeryElizabethStill.htm>

American Psychological Society-Ethical Principles of Psychologists and Code of Conduct

<http://www.apa.org/ethics/code/index.aspx>

I \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ acknowledge that I have received a copy of the Let’s Talk About It Community Mental Health Services Inc. Code of Ethics, and that I will adhere to this code.

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Employee Name Date

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Employee Name Date