

Shepherds Recovery Counseling Services

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Midwest City, Ok 73110

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Aspire To Excellence

Section (1)

Adopted: 06/10/2017

Effective 07/10/2018

Revised 08/12/2020

Shepherds Recovery Counseling Services Inc.	Policy and Procedures
Policy Type:- Aspire to Excellence	Policy Number: ATE - 127
Subject:- Leadership	Adopted: 06/10/2017
Section:- (1.A)	Effective: 07/10/2018
Approved By:- <i>Jemi Rotimi</i>	Revised: 08/12/2020

(1.A.1)- The organization identifies

▶ **Leadership**

(SRCS Agency) was incorporated to promote and emotionally healthy youth and child abuse through counseling and by providing community-based counseling for children and youth. **SRCS** was formed under the laws of the State of Oklahoma as a private for **Profit Company**. To develop and provide innovative, responsive, cost effective, and high quality behavioral healthcare services for Oklahoma’s **children, adolescents, adults, seniors, families, and communities**. We are also committed to helping the **consumer** and the communities reach its **fullest potential**. Our primary service area is the grater **Oklahoma Metropolitan** statistical area.

(SRCS Agency) will maintain national accreditation through **CARF**, a nationally recognized accreditation center, in accordance with their accepted Standards.

▶ **(1.A.2)/ (1.A.3) Mission and Philosophy**

The mission of **SRCS** is to promote mentally and emotionally healthy youths and their families by reducing delinquency and child abuse through individual, family and group counseling and by providing community-based counseling for children, youth and adult, **SRCS** will also provide public education programs and training seminars to schools, churches, organizations, professional, and community groups, **upon request**

(SRCS agency) works with your Primary Care Provider to evaluate the mind-body, behavior connection and provides solution-focused interventions. Together, your providers can determine a course of action that serves your needs holistically.

▶**Our Philosophy:** - is to enhance self-sufficiency by providing tools and skills to Clients in need, to treat a whole person, **body, mind** and **spirit**, to function **socially, emotionally, psychologically** and **culturally**.

▶**C. Our Core Values**

In order to best serve our Clients and remain true to our employees, **SRCS** agency

embraces the following **core values**:

Celebrating Diversity: - Respecting the rights, differences, and dignity of others.”

Recovery: - Achieving a high quality, self-directed, satisfying life integrated in the community.

Quality: - Commitment to Excellence.

Public Awareness: - Dedicated to increasing the understanding of mental illness and eliminating stigma.

Collaboration: - Partnering with Clients and stakeholders to create healthy communities.

Technology: - Embracing Technology to improve efficiency and quality of care.

► **Person Centered Philosophy**

To develop and provide innovative, responsive, cost effective, and high quality behavioral healthcare services for Oklahoma’s **children, adolescents, adults,** seniors, families, and communities.

We are also committed to helping the consumer and the communities reach its fullest potential. Our primary service area is the **greater Oklahoma Metropolitan** statistical area.

(**SRCS agency**) believes this philosophy to be the cornerstone for **planning, development,** and **coordination** of a quality service delivery system. Services will be based on a process of **prevention, education,** **counseling,** and **advocacy.**

Shepherds Recovery Counseling Services Inc.	Policy and Procedures
Policy Type:- Aspire to Excellence	Policy Number: ATE - 128
Subject:- Delegations of Authority	Adopted: 06/10/2017
Section:- (1.b.3)	Effective: 07/10/2018
Approved By:- <i>Jemi Rotimi</i>	Revised: 08/12/2020

(SRCS agency) is governed by the **Executive Director** and/or **Board of Advisory** comprised of citizens from the Oklahoma City areas, along with other state youth service agencies, from a network of helpful programs in Oklahoma. **SRCS** agency is dedicated to serving **troubled youth** and their **families** at the local level. We believe Oklahoma youth deserve a chance to become responsible adults.

► **Designated Authority:** - The Leadership Team of **SRCS** is comprised of the **Executive Director, Clinical Director, HR/Office Manager** and **Compliance/Safety Officer**. The Leadership Team is the designated authorities that includes but are not limited to the following:

1. Provide leadership for implementation of the goals, purpose, and objectives for continual improvement of the organization.
2. Develop and implement service programs and projects for children, adolescents, adults, and families in need of assistance.
3. Identify and study trends and concerns of communities in **SRCS** Family Services area.
4. Be involved in the rehabilitative and educational aspects of youth and family services with strong emphasis developing social skills and interacting with others positively as well as developmentally appropriate life skills.
5. Cooperate and promote relationships with organizations, agencies, and voluntary groups in carrying out these purposes and objectives.
6. Promote community and Agency funding of current and future programs.

Shepherds Recovery Counseling Services Inc.	Policy and Procedures
Policy Type:- Aspire to Excellence	Policy Number: ATE - 129
Subject:- Professional Personnel	Adopted: 06/10/2017
Section:- (1.b.2)(g)	Effective: 07/10/2018
Approved By:- <i>Jemi Rotimi</i>	Revised: 08/12/2020

The Leadership Team (LT) will employ professional personnel as needed to carry out the programs of **SRCS Agency**.

The **Executive Director** is responsible for the operation of **SRCS Agency** with respect to the policies established by the Leadership Team. Included in these responsibilities is the health and safety, as outlined in policies, of **SRCS**, its staffs and those persons served. The **Executive Director** is responsible for a monthly review of **SRCS Agency** operations and expenditures and discussed with leadership.

The **Executive Director** will have final decision on financial matters that are addressed in **Leadership Team** meetings.

The **Clinical Director** will oversee the duties of **Executive Director** if the **Executive Director** is unable to perform expected duties due to absences, such as but not limited to vacation, sick leave, etc.

The **Clinical Director** duties are to develop, structure, and oversee all programs for Agency, enforce all policies and procedures, enhance available resources for our consumers serviced, ensure proficiency in all the areas as it pertains to the management, oversight and compliance of all Clinician providing services on behalf of **SRCS Agency**.

The **Clinical Director** will see that confidential records are securely maintained, and that consumer's information is released to professionals providing supplemental services to the consumer, with written permission of the consumer, parent(s) or guardian, or as provided by law.

The **Compliance/Safety Officer** will execute orientation for new providers, annual trainings and continual trainings as necessary during monthly personnel meetings to assure that office personnel and providers are achieving the goal of Agency. The **Clinical Director** is responsible for the milieu of services to be culturally relevant and carried out with a person centered approach.

The **HR/Office Manager** will train new hire office personnel with orientation and supervise their duties to include oversight of billing, case records, policies and procedures, reconciliation of claims, process business documentations and direct such activities to subordinate assistive personnel members.

The **HR/Office Manager** will train and assist providers with electronic records. Assist providers in gaining access to electronic records and be available to assist providers with general questions about the electronic records computer program Cloud base (**EHR Software Application**).

The **Office Manager** will assist **Clinical Director** with reviewing Clinical documentation before billing and has authority to conduct all aspects of the business as described by the Executive Director in his absence.

The Office Personnel will assist the **HR/Office Manager** with tasks connected with electronic records.

The Office Personnel will maintain logs for referrals, and input the data into the electronic records program.

The Office Personnel will greet visitors and consumers when they come to the office and make sure those consumers and visitors sign in at the front desk.

The Office Personnel will participate in any task requested by the **HR/Office Manager, Compliance/Safety Officer, Clinical Director** or **Executive Director**.

The Provider will maintain required paper work and submit said paper work in a timely manner following the guidelines of Oklahoma Health Care Authority regulations connected with documentation.

The Provider will maintain contact with the Provider on a regular basis to discuss the outcomes and progress of treatment for shared consumers.

Shepherds Recovery Counseling Services Inc.	Policy and Procedures
Policy Type:- Aspire To Excellence	Policy Number: ATE - 130
Subject:- Agency Lines of Authority	Adopted: 06/10/2017
Section:- (1.b.4)	Effective: 07/10/2018
Approved By:- <i>Jemi Rotimi</i>	Revised: 08/12/2020

► Policy

It is the intent of (**SRCS agency**) to maintain clear lines of authority and responsibility between the **Board of Advisory**, its **Executive Director** and employees, and non-paid staff (volunteers). Therefore, it shall be the policy of **SRCS agency** to maintain a **SRCS organizational chart** setting forth the operational components of **SRCS agency** and the relationship of each role and/or function to the other.

Shepherds Recovery Counseling Services Inc.	Policy and Procedures
Policy Type:- Aspire to Excellence	Policy Number: ATE - 131
Subject:- Cultural Diversity Plan	Adopted: 06/10/2017
Section:- (1.A.5)	Effective: 07/10/2018
Approved By:- <i>Jemi Rotimi</i>	Revised: 08/12/2020

► **Policy: SRCS agency** will have a diversity and cultural competency plan. The plan will be reviewed annually and updated as necessary. Cultural Competency shall be trained at new hire_and annually to all employees and contractors.

► **Procedure**

Cultural Competence and Diversity Plan:

The plan for cultural competence and diversity at **SRCS Agency** is to achieve mission success in an ever-changing environment through the strengths of our employees and community. These goals will be established to ensure a diverse pool of qualified candidates, to make the agency a desirable place to work, to promote agency values, and to practice cultural competence in Clinical program practices.

(**SRCS agency**) is committed to creating an inclusive environment where diversity is valued so that individuals will be inspired to contribute fully to mission success. We will strive to be recognized by our employees and the community as an employer and service provider of choice.

► **The plan includes, at a minimum:**

- Recruitment of personnel who reflect the cultural diversity of the community
- Retention of personnel who reflect the cultural diversity of the community
- Provision for recruiting leadership that is representative of the specific cultures the agency serves
- Program practices, which promote consumers active involvement in treatment services and cultural sensitivity to support successful recovery

► **Procedure Plan:**

Recruiting Efforts

Goals

- Seek opportunities and methods to increase the available pool of qualified behavioral health professionals, direct care workers and skilled clerical staff, and focus recruiting efforts to attract qualified people minorities, veterans, and people with disabilities, and persons who reflect the community cultural diversity.
- Develop a high-performance workplace that values diversity, recognizes outstanding

achievements, and promotes inclusion.

- Use internship programs as diversity recruiting tools by recruiting students from a diverse group of candidates.
- Explore changes in the agency benefits package that could help to attract and retain women, minorities, and the disabled.

► **Staff Development and Retention Goals**

- Promote more diversity of representation on work committees and management-level committees to ensure representation of diverse needs and points of view.
- For the unskilled category, explore an educational assistance program to encourage pursuit of specialized training.
- Establish upper management expectations toward managing diversity, and communicate to all **SRCS** agency employees the definitions, purpose and key concepts related to valuing diversity.
- Identify and assess issues and situations that either enhance or degrade the level of employee job satisfaction and morale at **SRCS agency**.
- Create an environment of equal opportunity that ensures that **SRCS agency** employees with relevant skills, abilities, and experience can achieve their full potential through advancements, promotions, and career opportunities.
- Strive to maintain leadership that is representative of the cultures served at **SRCS agency**.

► **Sensitivity and Competence Regarding Consumer Preferences and Culture Goals**

- **SRCS agency** will promote awareness and services that value the welcoming of consumers, active participation and choices for treatment for individual consumers and their families or significant others, and sensitivity to the unique culture of each person served.
- Demonstration of cultural competency and diversity will be through program practices of assessment and active participation of consumers in the treatment planning process.
- The organization shall respond to diversity of persons served in the areas, and additional areas as awareness give evidence:
- Culture, Age, Gender, Sexual orientation, Spiritual beliefs, Socioeconomic status, and Language

- Additional demonstration of this plan is to document and verify the training and support of employees and contractors in the skills of competent cultural sensitivity and knowledge in program practices.

▶ Procedures

A) **Leadership Positions**: As vacancies occur, qualified individuals of minority status will be encouraged to apply for openings on **SRCS agency** staff. Leaders will be encouraged to participate in training on cultural diversity/competency, as they are available. Such training will be documented in the attendee's personnel file.

B) **Management Positions**: The management team consists of the **Executive Director, Clinical Director, HR/Office Manager and Compliance/Safety Officer**. It is the policy of **SRCS** to base all hiring on merit and business need without regard to ethnicity, race, religion, age, gender, or sexual preferences.

C) **Direct Service Providers**: As vacancies occur, qualified individuals of minority status will be encouraged to apply for openings on **SRCS** staff. **SRCS** staff competency will include the sensitivity and knowledge to address the cultural needs of Clients. **SRCS** will maintain a listing of individuals on staff who have specialized training and knowledge working with culturally diverse populations.

▶ Respecting Diversity

1. **Non-discrimination**. Direct Service Providers do not condone or engage in discrimination based on age, color, culture, disability, ethnic group, gender, race, religion, sexual orientation, marital status, or socioeconomic status.
2. **Respecting Differences**. Direct Service Providers will actively attempt to understand the diverse cultural backgrounds of the Clients with whom they work. This includes, but is not limited to, learning how the counselor's own cultural/ethnic/racial identity impacts her or his values and beliefs about the counseling process.

D) **Support Service Providers**: As vacancies occur, qualified individuals of minority status will be encouraged to apply for openings on the **SRCS agency** staff. Support Service Providers will be encouraged to participate in training on cultural diversity/competency, as they are available. Such training will be documented in the attendee's personnel file.

◀ Respecting Diversity

- a. **Non-discrimination**. Personnel do not condone or engage in discrimination based on age, color, culture, disability, ethnic group, gender,

race, religion, sexual orientation, marital status, or socioeconomic status.

- b. **Respecting Differences**. Personnel will actively attempt to understand the diverse cultural backgrounds of the Clients with whom they work. This includes, but is not limited to, learning how the counselor's own cultural/ethnic/racial identity impacts her or his values and beliefs about the counseling process.

Shepherds Recovery Counseling Services Inc.	Policy and Procedures
Policy Type:- Aspire to Excellence	Policy Number: ATE - 132
Subject:- Corporate Responsibility	Adopted: 06/10/2017
Section:- (1.A.6)	Effective: 07/10/2018
Approved By:- <i>Jemi Rotimi</i>	Revised: 08/12/2020

▶ **(1.6.a.1) Business:** - Fiscal management will be conducted in a specific manner that will remain consistent with the purpose and vision of the agency. It will also demonstrate responsible practices and maintain legal requirements. A certified public accountant (CPA) will conduct an **independent examination** of **SRCS** financial status annually. The CPA may not have a personal relationship with any funding source.

SRCS will disclose its current tax status to all interested parties. This disclosure will be included on appropriate **SRCS** agency brochures and other literature. **SRCS agency** is a for profit corporation.

▶ **(1.6.a.2) Marketing:** - (**SRCS agency**) will not falsely advertise any of its services. It will only report services it actually provides.

▶ **(1.6.a.3) Contractual Relationship:-** (**SRCS agency**) practices services within the boundaries of The Oklahoma Health Care Authority, whereas, should two agencies be providing services to the same Client at the same time a letter of collaboration must be obtained with signatures of both participating agencies. **SRCS** agency also has in place a form in the event two therapists within the Agency share services with the same Client. This is done to ensure the Client has freedom of choice, and all efforts are being made in the best interest of the Client,

▶ **(1.6.a.4) Conflicts of interest:** - (**SRCS agency**) is committed to ensuring its employees avoid possible conflict of interest situations by performing their duties in a professional and moral manner. The goals are to prevent clients from being taken advantage of, to reduce management risks, to manage human resources, to deliver services effectively and efficiently and to prevent actual or perceived conflict of interest.

▶ **(1.6.a.5) Use of social media:-** This policy provides guidance for employee use of social media, which should be broadly understood for purposes of this policy to include facebook, blogs, wikis, microblogs, message boards, chat rooms, electronic newsletters, online forums, social networking sites, and other sites and services that permit users to share information with others in a contemporaneous manner.

◀ **PROCEDURES:** The following principles apply to professional use of social media on behalf of **SRCS** as well as personal use of social media when referencing **SRCS**.

→ Employees need to know and adhere to the **SRCS's** Code of Conduct, Employee Handbook, and other **SRCS** policies when using social media in reference to **SRCS**.

→ Employees should be aware of the effect their actions may have on their images, as well as **SRCS's** image. The information that employees post or publish may be public information for a long time.

→ Employees should be aware that **SRCS** may observe content and information made available by employees through social media. Employees should use their best judgment in posting material that is neither inappropriate nor harmful to **SRCS**, its employees, or customers.

→ Although not an exclusive list, some specific examples of prohibited social media conduct include posting commentary, content, or images that are defamatory, pornographic, proprietary, harassing, libelous, or that can create a hostile work environment.

→ Employees are not to publish post or release any information that is considered confidential or not public. If there are questions about what is considered confidential, employees should check with the **Human Resources Office** and/or supervisor.

→ Social media networks, blogs and other types of online content sometimes generate press and media attention or legal questions. Employees should refer these inquiries to authorized **SRCS** spokespersons.

→ If employees find encounter a situation while using social media that threatens to become antagonistic, employees should disengage from the dialogue in a polite manner and seek the advice of a supervisor.

→ Employees should get appropriate permission before you refer to or post images of current or former employees, members, vendors or suppliers. Additionally, employees should get appropriate permission to use a third party's copyrights, copyrighted material, trademarks, service marks or other intellectual property.

Social media use shouldn't interfere with employee's responsibilities at **SRCS**. **SRCS's** computer systems are to be used for business purposes only. When using **SRCS's** computer systems, use of social media for business purposes is allowed (ex: Facebook, Twitter, **SRCS** blogs and LinkedIn, but personal use of social media networks or personal blogging of online content is discouraged and could result in disciplinary action.

→ Subject to applicable law, after hours online activity that violates the **SRCS's** Code of Conduct or any other **SRCS** policy may subject an employee to disciplinary action or termination.

→ If employees publish content after hours that involves work or subjects associated with **SRCS**, a disclaimer should be used, such as this: “The postings on this site are my own and may not represent **SRCS**’s positions, strategies or opinions.”
→ It is highly recommended that employees keep **SRCS** related social media accounts separate from personal accounts, if practical.

▶ **(1.6.a.6) Service Delivery:- (SRCS agency)** provides services to all age groups without regard to race, color, citizenship status, national origin, ancestry, religion, gender, age, physical or mental disability, physical handicap, marital status, or veteran status. Intake interviews are provided to all persons inquiring about services.

→ **Exchange of gift:-**

(A) **SRCS agency** not provide counseling services to friends of anyone associated with **SRCS agency**, this is done to avoid any conflict of interests.

(B) To comply with ethical codes and to avoid conflicts of interests, no persons employed by **SRCS agency** are allowed participating in exchanges of gifts, money, or gratuities with any Client receiving services from **SRCS agency**.

(C) (**SRCS agency**) and/or its employees shall not participate in the solicitation of Clients to assist in any fund raising activities to benefit or provide gain for **SRCS agency** or any individual associated with **SRCS agency**.

SRCS agency) practices respect for and safeguarding of the personal property of the persons served visitors, and personnel along with property owned by **SRCS agency**.

(D) (**SRCS agency**) has in place policies to set boundaries for self and Clients. Counselors are aware of their influential positions with respect to Clients, and they avoid exploiting the trust and dependency of Clients. Counselors make every effort to avoid dual relationships with Clients that could impair professional judgment or increase the risk of harm to Clients. (Example of such relationships includes, but is not limited to familial, social, financial, business, or close relationships with Clients.) When a dual relationship cannot be avoided, counselors take appropriate professional precautions such as informed consent, consultation, supervision, and documentation to ensure that judgment is not impaired and no exploitation occurs. Personnel dating within the office/**SRCS agency** setting is prohibited and not allowed to ensure a comfortable and stress free environment for all.

(E) **SRCS agency** and its representatives will serve as witness to any documentation as requested by the persons served, including but not limited to

power of attorney, guardianship advance directives.

(1.A.7) Professional Competence

▶ **Boundaries of Competence.** Counselors practice only within the boundaries of their competence, based on their education, training, supervised experience, state and national professional credentials, and appropriate professional experience. Counselors will demonstrate a commitment to gain knowledge, personal awareness, sensitivity, and skills pertinent to working with a diverse Client population.

▶ **New Specialty Areas of Practice.** Counselors practice in specialty areas new to them only after appropriate education, training, and supervised experience. While developing skills in new specialty areas, counselors take steps to ensure the competence of their work and to protect others from possible harm.

▶ **Qualified for Employment.** Counselors accept employment only for positions for which they are qualified by education, training, supervised experience, State and national professional credentials, and appropriate professional experience.

▶ **Monitor Effectiveness.** Counselors continually monitor their effectiveness as professionals and take steps to improve when necessary

▶ **Ethical Issues Consultation.** Counselors take reasonable steps to consult with the Director when they have questions regarding their ethical obligations or professional practice.

▶ **Continuing Education.** Counselors recognize the need for continuing education to maintain a reasonable level of awareness of current scientific and professional information in their fields of activity. They take steps to maintain competence in the skills they use, are open to new procedures, and keep current with the diverse and/or special populations with whom they work. Counselors will attend all required in-services.

▶ **Impairment.** Counselors refrain from offering or accepting professional services when their physical, mental, or emotional necessary, limit, suspend, or terminate their professional responsibilities.

Shepherds Recovery Counseling Services Inc.	Policy and Procedures
Policy Type:- Aspire To Excellence	Policy Number: ATE - 133
Subject:- Advertising and Soliciting Clients	Adopted: 06/10/2017
Section:-	Effective: 07/10/2018
Approved By:- <i>Jemi Rolimi</i>	Revised: 08/12/2020

→ **Accurate Advertising:** - There are no restrictions on advertising by **SRCS Agency** or counselors except those that can be specifically justified to protect the public from deceptive practices. Counselors advertise or represent their services to the public by identifying their credentials in an accurate manner that is not false, misleading, deceptive, or fraudulent. Counselors may only advertise the highest degree earned which is in counseling or a closely related field from a college or university that was accredited when the degree was awarded by one of the regional accrediting bodies recognized by the council on Post-secondary Accreditation.

→ **Testimonials:** - **SRCS Agency** and/or counselors who use testimonials do not solicit them from Client or other persons who, because of their particular circumstances, may be vulnerable to undue influence.

→ **Statements by Others:** - Counselors make reasonable efforts to ensure that statements made by others about them or the profession of counseling are accurate.

→ **Recruiting Through Employment:** - Counselors do not use their places of employment or institutional affiliation to recruit or gain Client, supervisees, or consultant agreements for their private practices.

→ **Products and Training Advertisements:** - Counselors who develop products related to their profession or conduct workshops or training events ensure that the advertisements concerning these products or events are accurate and disclose adequate information for consumers to make informed choices. They will not use **SRCS Agency** name for any reason without written approval from the **Clinical Director**.

→ **Promoting to Those Served:** - Counselors do not use counseling, teaching, training, or supervisory relationships to promote their products or training events in a manner that is deceptive or would exert undue influence on individuals who may be vulnerable. Counselors may adapt textbooks they have authored for instruction purposes.

→ **Professional Association Involvement:** - Counselors actively participate in local, state, and national associations that foster the development and improvement of counseling.

Shepherds Recovery Counseling Services Inc.	Policy and Procedures
Policy Type:- Aspire To Excellence	Policy Number: ATE - 134
Subject:- Credentials	Adopted: 06/10/2017
Section:-	Effective: 07/10/2018
Approved By:- <i>Jemi Rolimi</i>	Revised: 08/12/2020

→ **Credentials Claimed:** - Counselors claim or imply only professional credentials possessed and are responsible for correcting any known misrepresentations of their credentials by others. Professional credentials include graduate degrees in counseling or closely related mental health fields, accreditation of graduate programs, national voluntary certifications, government-issued certifications or licenses, professional memberships, or any other credential that might indicate to the public or to **SRCS Agency** specialized knowledge or expertise in counseling.

→ **Credential Guidelines:** - Counselors follow the guidelines for use of credentials that have been established by the entities that issue the credentials.

→ **Misrepresentation of Credentials:** - Counselors do not attribute more to their credentials than the credentials represent, and do not imply that other counselors are not qualified because they do not possess certain credentials.

→ **Doctoral Degrees from Other Fields:** - Counselors who hold a master’s degree in counseling or a closely related mental health field, but hold a doctoral degree from other than counseling or a closely related field, do not use the title “Dr.” in their practices and do not announce to the public in relation to their practice or status as a counselor that they hold a doctorate.

Shepherds Recovery Counseling Services Inc.	Policy and Procedures
Policy Type:- Aspire To Excellence	Policy Number: ATE - 135
Subject:- Public Responsibility	Adopted: 06/10/2017
Section:-	Effective: 07/10/2018
Approved By:- <i>Jemi Rolimi</i>	Revised: 08/12/2020

→ **Nondiscrimination:** - Counselors do not discriminate against Client, students, or persons being supervised in a manner that has a negative impact based on their age, color, culture, disability, ethnic group, gender, race, religion, sexual orientation, or socioeconomic status, or for any other reason.

→ **Sexual Harassment:** - Counselors do not engage in sexual harassment. Sexual harassment is defined as sexual solicitation, physical advances, or verbal or nonverbal conduct that is sexual in nature. Sexual harassment that occurs in connection with professional activities or roles, and that either (1) is unwelcome, is offensive, or creates a hostile workplace environment, and counselors know or are told this; or (2) is sufficiently severe or intense to be perceived as harassment to a reasonable person; in the context. Sexual harassment can consist of a single intense or severe act or multiple persistent or pervasive acts. Counselors will adhere strictly to **SRCS** Sexual Harassment Policy.

→ **Reports to Third Parties:** - Counselors are accurate, honest, and unbiased in reporting their professional activities and judgments to appropriate third parties including courts, health insurance companies, those who are the recipients of **SRCS** reports, and others.

→ **Media Presentations:-** When counselors provide advice or comment by means of public lectures, demonstrations, radio or television programs, prerecorded tapes, printed articles, mailed material, or other media, they take reasonable precautions to ensure that (1) the statements are based on appropriate professional counseling literature and practice; (2) the statements are otherwise consistent with the **Code of Ethics** and the Standards of Practice; and (3) the recipients of the information are not encouraged to infer that a professional counseling relationship has been established.

→ **Unjustified Gains:** - Counselors do not use their professional positions to seek or receive unjustified personal gains, sexual favors, unfair advantage, or unearned goods.

Shepherds Recovery Counseling Services Inc.	Policy and Procedures
Policy Type:- Aspire To Excellence	Policy Number: ATE - 136
Subject:- Responsibility to other professionals	Adopted: 06/10/2017
Section:-	Effective: 07/10/2018
Approved By:- <i>Temi Rotimi</i>	Revised: 08/12/2020

→ **Different Approaches.** Counselors are respectful of approaches to professional counseling that differ from their own. Counselors know and take into account the traditions and practices of other professional groups with which they work.

→ **Personal Public Statements.** When making personal statements in a public context, counselors clarify that they are speaking from their personal perspectives and that they are not speaking on behalf of **SRCS** and its other employees.

→ **Clients Served by Others.** When counselors learn that their Client are in professional relationship with another mental health professional, they request release from Client to inform the other professionals and strive to establish positive and collaborative professional relationships.

Shepherds Recovery Counseling Services Inc.	Policy and Procedures
Policy Type:- Aspire To Excellence	Policy Number: ATE - 137
Subject:- Human Resources	Adopted: 06/10/2017
Section:- (1.a.6(8))	Effective: 07/10/2018
Approved By:- <i>Jemi Rolimi</i>	Revised: 08/12/2020

Policy:- Criminal Background Checks:- (SRCS Agency) requires an Oklahoma State Bureau of Investigation (OSBI) background check, including history of sexual offenses, prior to appointment to a position. (SRCS Agency) will not tolerate any form of unlawful harassment against any SRCS employee by anyone including other employees, vendors and individuals receiving services.

Verification of License/Certification/Credentials: Copies of current licensure or certification must be on file at all times. Credentials will be verified either by phone, in writing, or via Internet with the appropriate licensing/ credentialing board, university, or school. (SRCS Agency) may require a drug test before or at any time after employment. If an applicant tests positive for drugs prior to beginning employment, that person will not be hired. If an employee tests positive for drugs, that person will stop providing services. As appropriate, SRCS agency will recruit both inside and outside its work force to obtain qualified applicants.

Shepherds Recovery Counseling Services Inc.	Policy and Procedures
Policy Type:- Aspire To Excellence	Policy Number: ATE - 138
Subject:- Fraud Waste and Abuse	Adopted: 06/10/2017
Section:- (1.A.7.D(2))	Effective: 07/10/2018
Approved By:- <i>Jemi Rolimi</i>	Revised: 08/12/2020

► Policy

SRCS places high priority on eliminating program fraud and abuse. **SRCS** agency policy requires any employee, contractor, Client, or other associated party to report any suspected waste, fraud and abuse to the **Corporate Compliance Officer**.

→ Definitions

To aid in the detection of fraud, program abuse, or criminal conduct, the following definitions are provided. These definitions are neither fully inclusive nor restrictive of all activities that may be included under each activity:

→ Fraud

A dishonest and deliberate course of action which results in obtaining money, property, or advantage to which one would not normally is entitled. This category includes, but is not limited to, improper claims, billing for services not delivered, false statements in determining rights to benefits, bribery, forgery, extortion, embezzlement, theft of participant checks, kickbacks from participants, contractors or other professionals, intentional payments to a contractor without the expectation of receiving services, payments to ghost employees, misuse of appropriated funds, and misrepresentation or falsification of information in official reports.

→ Waste

Expenditures or allocations of resources, in excess of need. **Waste** does not necessarily involve personal gain, but invariably indicates poor management. This could be a result of actions or situations arising out of management ineptitude or oversight, leading to major violations of the legislative requirements, regulations, or contract/grant provisions. Such actions or situations have the potential to hamper severely the accomplishment of program goals, waste resources, and jeopardize future funding.

→ Abuse

Exploitation of loopholes to the limits of law for personal gain. These actions include, but are not limited to, conflict of interest or the appearance of conflict of interest involving outside employment; business and professional activities; the receipt or giving of gifts, fees, entertainment, and favors; misuse of **SRCS** agency

property; misuse of confidential information; and such other activities as might adversely affect the confidence of the public in the integrity of **SRCS agency**.

→ **Other Wrong Doings**

This would cover any instances within the Agency where it is felt that wrong has occurred, and has not been listed under the fraud, waste, or abuse section of the policy and procedures.

→ **Procedures**

Reports of fraud, waste, and abuse can be made either orally or in writing to the **Executive Director**. He will begin investigation of the complaint within 24 hours of the initial complaint. The **Executive Director** will follow the procedures set forth in the Operating Agreement concerning investigations of violations. The **Executive Director** will deliver a written report to the reporting party within two weeks of beginning the investigation. This report will include findings to date and state whether the investigation is completed or if more time is needed for the investigation. If more time is needed, the **Executive Director** will give an estimate of completion date in the written report.

Shepherds Recovery Counseling Services Inc.	Policy and Procedures
Policy Type:- Aspire To Excellence	Policy Number: ATE - 139
Subject:- Violation of Ethical Code	Adopted: 06/10/2017
Section:- (1.A.6.b)	Effective: 07/10/2018
Approved By:- <i>Jemi Rolimi</i>	Revised: 08/12/2020

(**SRCS agency**) along with its legal counsel, where necessary, will promptly respond to and investigate all allegations of wrongdoing of **SRCS agency** employees. The **Executive Director** will lead any investigation relating to **SRCS agency** Responsibility Program.

→ **Investigation**

Upon the discovery that a material violation of the law or of the Policy has occurred, **SRCS agency** shall take immediate action to rectify the violation, if possible; to report the violation to the appropriate regulatory body, if necessary; and to appropriately sanction the culpable employee(s) of **SRCS agency**. Promptly after any discovered material violation is addressed, **SRCS agency** shall, amend this Policy in any manner that **SRCS agency** feels will prevent any similar violation(s) in the future.

If an investigation of an alleged violation is undertaken and **Executive Director** believes the integrity of the investigation may be at stake because of the presence of employees under investigation, the employee(s) allegedly involved in the misconduct will, at the discretion of the **Executive Director** is removed from his/her/their current work activity until the investigation is completed. In addition, **SRCS agency** will take any steps necessary to prevent the destruction of documents or other evidence relevant to the investigation. Once an investigation is completed, the **Executive Director** will develop a plan of action to remedy or prevent re-occurrence.

→ **(1.a.6.b(1) No Reprisals/Confidentiality**

No action will be taken against any employee, Client, stakeholder or contractor for disclosing information of criminal or improper activities or making a complaint to the proper authorities. The reporting party's identity will not be disclosed except where there is consent or it is determined that disclosure will be unavoidable during the course of an investigation.

→ **(1.a.6.b(2)**

Should a violation of Ethical Codes occur within the Agency, the **Executive Director** will begin investigation immediately, and hope to have the issue resolved within **11** business days?

→ (1.a.6.c) Education of personnel and other stakeholders on ethical codes of conduct.

All employees of **SRCS agency** are required to read the ethical code of conduct. All Mental Health Therapist are required to submit evidence of 3 hours of ethics training.

Stakeholders are encouraged to read the ethical code of conduct. All Stakeholders are responsible to ahead to ethical code of conducts within their various fields.

→ **Policy: - (SRCS agency)** requires all staff members to be trained in certain mandatory subjects prior to delivering services. These areas of training are to be kept current each year and proof of training maintained in personnel records. These areas include:

- Code of Ethics
- Resolving Ethical Issues
- Confidentiality
- Confidentiality Requirements
- Professional Responsibility of Providers
- Rights of Clients
- Cultural Diversity
- Prevention of Violence in Work Place
- Home Bound Safety Training
- Reporting of Abuse and Neglect
- Suicidal Intervention
- Critical Incident Reporting
- Professional Conducting
- Training in Paperwork

Other areas of training are addressed throughout this Policy and Procedure Manual. Employees are required to complete all training required of their position at the first opportunity the training is provided, but not less than one year of their start date.

An abbreviated **Code of Ethics** is given to each Client at the time of the initial assessment. In addition, the Code of Ethics is to be kept in the office at all times and provided to any person so requesting.

Shepherds Recovery Counseling Services Inc.	Policy and Procedures
Policy Type:- Aspire To Excellence	Policy Number: ATE - 140
Subject:- Advertising efforts for the Clients	Adopted: 06/10/2017
Section:- (1.A.6)	Effective: 07/10/2018
Approved By:- <i>Jemi Rolimi</i>	Revised: 08/12/2020

(SRCS Agency) provides individual, couples; family, case management and group counseling, referrals are made for all other services. Other services include but are not limited to:

Mediation

Spiritual services

Food banks

→ **6f. Contractual Relationships:** Therapists may contract with **SRCS agency** to provide services on a contractual basis. Contract employees are paid per unit rate for actual face-to-face services provided and are not eligible for benefits.

→ **6e Demonstrate Agency citizenship:**

SRCS agency provides employment opportunities for contract clinician.

SRCS agency accepts referrals from a psychiatrist and psychologist.

SRCS agency participates in the distribution of food and accepts referrals from a food bank.

SRCS agency provides home based services to address the mental health needs of person who are homebound or unable to access transportation to a mental health facility.

Shepherds Recovery Counseling Services Inc.	Policy and Procedures
Policy Type:- Aspire To Excellence	Policy Number: ATE - 141
Subject:- Regulatory Agency Compliance Officer	Adopted: 06/10/2017
Section:- (1.A.7)	Effective: 07/10/2018
Approved By:- <i>Jemi Rolimi</i>	Revised: 08/12/2020

In an effort to ensure Agency Responsibility with this Policy, the executive director of **SRCS** has adopted a formal Agency Responsibility Program. The agency **Compliance/Safety Officer** will oversee and implement this program. He will provide for **education** and **training programs** for personnel and respond to inquiries from any personnel regarding appropriate billing, documentation, coding, and business practices and investigate any allegations of possible impropriety.

(2) Duties and Responsibilities of the Agency **Compliance/Safety Officer**

The duties and responsibilities of the **Executive Director** will include, but are not limited to, those shown below.

(a) Working with **SRCS agency** personnel, and attorneys in preparing, developing, and overseeing the implementation of, written procedures and guidelines on federal, state, and local regulatory issues involving ethical and legal practices. These issues and practices cross treatment and administrative boundaries are described in this Manual. They include the following: Clinical records documentation; coding and billing practices with respect to requests for payments and/or reimbursements from Medicare/Medicaid or any other federally funded health care program; the giving and receiving of remuneration to induce referrals; engagement in certain business affiliations or pricing arrangements that may affect competition, and other issues described in this Manual.

(b) Developing and implementing an educational program for **SRCS agency** personnel to ensure understanding of regulations involving ethical and legal business and treatment practices. **SRCS agency** will provide initial training on the Agency Responsibility Program to all personnel, training to new personnel during orientation. Training relating to regulatory Agency Responsibility issues will be incorporated into existing training plans.

© Handling inquiries and allegations by personnel regarding any aspect of compliance.

(d) Investigating any information or allegation concerning possible unethical or improper business or treatment practices.

(e) Providing guidance and interpretation to the **SRCS agency**, on matters

related to the Agency Responsibility Program.

(f) Planning and overseeing regular, periodic audits of **SRCS** agency operations in order to identify and rectify any barriers to the efficacy of the Program.

(g) Preparing at least annually a report to **SRCS agency Executive Director** concerning the Agency Responsibility activities and actions undertaken during the previous or current year, the proposed Agency Responsibility program for the next year, and any recommendations for changes in the Agency Responsibility Program.

(h) Ensuring that independent contractors and other agents who furnish services to **SRCS agency** are aware of **SRCS** Agency Responsibility Program including, without limitation, its policies with respect to the specific areas of documentation, coding, billing and competitive practices.

(i) Performing such other duties and responsibilities as the Agency may need.

Shepherds Recovery Counseling Services Inc.	Policy and Procedures
Policy Type:- Aspire To Excellence	Policy Number: ATE - 142
Subject:- Agency Responsibility Committees	Adopted: 06/10/2017
Section:- (1.A.7(2a))	Effective: 07/10/2018
Approved By:- <i>Jemi Rolimi</i>	Revised: 08/12/2020

► **Agency Responsibility Committees**

Policy:- **SRCS agency** will create one or more committees as needed, possibly within its Quality Improvement Structure, to advise the **Executive Director** and assist with the development and implementation of the Agency Responsibility Program. Membership on future committees does not have to be restricted to personnel. The purpose of the committee is to allow **SRCS agency** and the **Executive Director** to benefit from the combined experiences and perspectives of individuals with varying responsibilities in **SRCS agency** such as, direct Service, finance, billing, and human resources.

Shepherds Recovery Counseling Services Inc.	Policy and Procedures
Policy Type:- Aspire To Excellence	Policy Number: ATE - 143
Subject:- Special Reporting by Executive Director	Adopted: 06/10/2017
Section:- (1.A.7(2b))	Effective: 07/10/2018
Approved By:- <i>Jemi Rolimi</i>	Revised: 08/12/2020

► **Special Reporting by Executive Director**

In general, recommendations from the **Executive Director** regarding Agency Responsibility matters will be directed to the **Executive Director** where an agreed solution will be enforced. Personnel Inquiries and Reports of Potential Misconduct and Establishment of a Hotline

(a) The **Executive Director** shall have an “open door” policy with respect to receiving inquiries and reports of violations, or suspected violations, of the law or of the Program and with respect to answering personnel questions concerning adherence to the law and to the Program.

(b) All personnel and Clients will be provided with the telephone number of the **Executive Director**. All information reported to the **Executive Director** by any personnel in accordance with the Agency Responsibility Policy would be kept confidential by **SRCS** to the extent that confidentiality is possible throughout any resulting investigation. Under no circumstances shall the reporting of any such information or possible impropriety serve as a basis for any retaliatory actions to be taken against any personnel, Client, or other person making a good-faith report to the **Executive Director**. The telephone number for the **Executive Director** shall be posted in a conspicuous location at **SRCS Agency office**.

Shepherds Recovery Counseling Services Inc.	Policy and Procedures
Policy Type:- Aspire To Excellence	Policy Number: ATE - 144
Subject:- Regulatory Agency Responsibility Educational Program	Adopted: 06/10/2017
Section:- (1.A.7(2c))	Effective: 07/10/2018
Approved By:- <i>Jemi Rolimi</i>	Revised: 08/12/2020

► **Regulatory Agency Responsibility Educational Program**

(1) **Purpose of Educational Program:-**The Agency Responsibility Program promotes **SRCS** policy of adherence to the highest level of professional and ethical standards, as well as applicable laws and regulations. **SRCS** will make available appropriate educational and training programs and resources to ensure that all personnel are familiar with those areas of law that apply to and impact upon the conduct, documentation, coding, billing and competitive practices of **SRCS**

(2) **Responsibility for Educational Program:-**The **Executive Director** is responsible for implementation of the Agency Responsibility educational program. The program is intended to supplement existing personnel training and to provide each personnel of **SRCS** with an appropriate level of information and instruction regarding ethical and legal documentation, coding, billing and competitive practices, and with the appropriate procedures to carry out the Policy. Education and training of all personnel shall be conducted at least annually. Each educational program presented shall allow for a question and answer period at the end of such program.

(3) **Subject Matter of Educational Program:-**The educational program shall explain the applicability of pertinent laws, including, without limitation, applicable provisions of the False Claims Act (31 U.S.C. 3729), the civil and criminal provisions of the Social Security Act (42 U.S.C. 1320a-7a and 1320a-7b, respectively), criminal offenses concerning false statements relating to health care matters (18 U.S.C. 1035), the criminal offenses of health care fraud (18 U.S.C. 1347), the Federal Anti-Referral Laws (42 U.S.C. 395nn), the Anti-Kickback Laws (42 U.S.C. 1320a-7b(b)), and the Sherman Antitrust Act (15 U.S.C. 1, 2, and 18). As additional legal issues and matters become known, they will be included in the educational program. Each education and/or training program conducted hereunder shall reinforce the fact that strict Agency Responsibility with the law and with **SRCS** Policy is a condition of employment with **SRCS**.

(4) **Training Methods:** - Different methods may be utilized to communicate information about applicable laws and regulations to **SRCS** personnel, as determined by the **Executive Director**. **SRCS** may conduct training sessions regarding compliance, which may be mandatory for selected personnel. These

training sessions may be incorporated into a monthly staff meeting. **SRCS** orientation for new personnel will include discussions of the Agency Responsibility Program and a personnel obligation to maintain the highest level of ethical and legal conduct.

Shepherds Recovery Counseling Services Inc.	Policy and Procedures
Policy Type:- Aspire To Excellence	Policy Number: ATE - 145
Subject:- Personnel Polices	Adopted: 06/10/2017
Section:- (1.A.8)	Effective: 07/10/2018
Approved By:- <i>Jemi Rolimi</i>	Revised: 08/12/2020

► Personnel Policies

The personnel policies and related matters in the Agency Responsibility Program are not intended to replace **SRCS** Personnel Policies. The personnel issues and requirements in the Agency Responsibility Program should be viewed as additive to those in the Personnel Manual.

→ Personnel Responsibilities, Personnel Performance, and Sanctions

1. Personnel Obligations

a. Reporting Obligations.

Personnel must immediately report to the **Executive Director** any suspected or actual violations (whether or not based on personal knowledge) of applicable laws or regulations by **SRCS** Agency or any of its personnel. Any personnel making a report may do so anonymously if he/she so chooses. Once personnel have made a report, the personnel have a continuing obligation to update the report as new information comes into his/her possession. All information reported to the **Executive Director** by any personnel in accordance with the Agency Responsibility Policy will be kept confidential by **SRCS** to the extent that confidentiality is possible throughout any resulting investigation.

b. Non-Retaliation Policy.

Under no circumstances shall the reporting of any such information or possible impropriety, made in good faith, serve as a basis for any retaliatory actions to be taken against any personnel making the report.

1. Acknowledgment Statement.

Each personnel must complete and sign from time to time an Acknowledgment Statement to the effect that the personnel fully understands the Agency Responsibility Program, and acknowledges his/her commitment to comply with the Program as personnel of **SRCS**. Each acknowledgment statement shall

form a part of the personnel file of each personnel. It shall be the responsibility of each director to ensure that all personnel under his/her supervision who are materially involved in any of **SRCS** documentation, coding, billing, and competitive practices have executed such an acknowledgment.

2. **Assessment of Personnel Performance under Agency Responsibility Program**

a. **Violation of Applicable law or Regulation.**

If a member of personnel violates any law or regulation in the course of his/her employment, the personnel will be subject to sanctions. **SRCS** Personnel Policies fully describe performance evaluations and sanctions relating to disciplinary issues. The possible sanctions include, but are not limited to, termination, suspension, demotion, and reduction in pay, reprimand, and/or re-training.

b. **Other Violations of the Agency Responsibility Program.**

In addition to direct participation in an illegal act, personnel will be subject to disciplinary actions by **SRCS** for failure to adhere to the principles and policies set forth in this Agency Responsibility Program. Examples of actions or omissions that will subject personnel to discipline on this basis include, but are not limited to the following:

- (1) A breach of Agency Responsibility Program policies
- (2) Failure to report a suspected or actual violation of law or a breach of the Program
- (3) Failure to make, or falsification of, any certification required under the Agency Responsibility Program
- (4) Lack of attention or diligence on the part of supervisory personnel that directly or indirectly leads to a violation of law
- (5) Direct or indirect retaliation against personnel who reports a violation of the Agency Responsibility Program or a breach of the Program.

3. **Personnel Evaluations**

Personnel participation in, and adherence to, the Agency Responsibility Program and related activities will be an element of his/her performance evaluations. As such, it will affect decisions concerning compensation, promotion, and retention.

Shepherds Recovery Counseling Services Inc.	Policy and Procedures
Policy Type:- Aspire To Excellence	Policy Number: ATE - 146
Subject:- Response to and Investigation of Reports of Violations	Adopted: 06/10/2017
Section:- (1.A.7.e)	Effective: 07/10/2018
Approved By:- <i>Jemi Rolimi</i>	Revised: 08/12/2020

▶ **Response to and Investigation of Reports of Violations**

(**SRCS agency**) along with its legal counsel, where necessary, will promptly respond to and investigate all allegations of wrongdoing of **SRCS** personnel. The **Executive Director** in consultation with the **Executive Director** and others, as appropriate, will lead any investigation relating to **SRCS** Agency Responsibility Program.

(1):- **Investigation**

Upon the discovery that a material violation of the law or of the Policy has occurred, **SRCS** shall take immediate action to rectify the violation, if possible; to report the violation to the appropriate regulatory body, if necessary; and to appropriately sanction the culpable personnel(s) of **SRCS**. Promptly after any discovered material violation is addressed, **SRCS** shall, amend this Policy in any manner that **SRCS** think will prevent any similar violation(s) in the future.

If an investigation of an alleged violation is undertaken and the **Executive Director** or believes the integrity of the investigation may be at stake because of the presence of personnel under investigation, the personnel(s) allegedly involved in the misconduct will, at the discretion of the **Executive Director**, be removed from his/her/their current work activity until the investigation is completed. In addition, **SRCS** will take any steps necessary to prevent the destruction of documents or other evidence relevant to the investigation. Once an investigation is completed, the **Executive Director** will develop a plan of action to remedy or prevent re-occurrence.

(2):- **Documentation of Reports and Investigation**

The **Compliance/Safety Officer** will maintain a Complaint and Inquiry Log and files on all investigations. The log and files will contain sufficient information to reasonably understand the specifics of each inquiry, allegation and investigation. Agency Responsibility Reports summarizing the contents of log and investigations will be prepared at least annually and presented to the Management Team.

(3):- **Disclosure of Violations to Governmental Authorities**

(**SRCS agency**) is obligated to report certain violations directly to the appropriate government authority. The **Executive Director**, in consultation with

SRCS attorney, should report certain violations within thirty to sixty days of their discovery. **SRCS** personnel will be notified immediately. Formal disclosure is not necessarily required for certain minor findings. For example, if a service was legitimately provided on one day, but accidentally billed on a different day, **SRCS** can continue its current practice of repaying the fee for the incorrect date and submitting a separate bill for the correct date. However, if the bill were submitted fraudulently, disclosure would be required.

Shepherds Recovery Counseling Services Inc.	Policy and Procedures
Policy Type:- Aspire To Excellence	Policy Number: ATE - 147
Subject:- Auditing and Monitoring	Adopted: 06/10/2017
Section:- (1.a.11)	Effective: 07/10/2018
Approved By:- <i>Jemi Rolimi</i>	Revised: 08/12/2020

► **Auditing and Monitoring**

(1) **Importance of Auditing and Monitoring**

It is critical to **SRCS** adherence to the Agency Responsibility Program that there will be regular auditing and monitoring of the activities of **SRCS** operations in order to identify and to promptly rectify any potential barriers or problems related to such compliance. The auditing and monitoring practices shown below are more thoroughly described in Part II of the Agency Responsibility Program and in other sections of the Policies and Procedures Manual. They are a supplement to existing practices.

(2) **Regular Audits**

The **Executive Director** and his designates will conduct regular, periodic audits. If indicated, he will consult with **SRCS** attorneys, and a CPA firm. Such audits will complement existing practices, evaluate conformance to the Agency Responsibility Policy, and determine what, if any, Agency Responsibility issues exist. Such audits shall be designed and implemented to ensure adherence to **SRCS** Agency Responsibility Policy and applicable federal, state, and local laws. Agency Responsibility audits shall be conducted in accordance with the comprehensive audit procedures established by the **Executive Director**, as described herein and in Part II. Agency Responsibility audit procedures and all investigations and the results thereof, are confidential to the extent allowed by law. **SRCS** where indicated, may ask its attorney to lead an audit, monitoring, or investigation procedure.

(3) **Other Monitoring Activities**

(a) The **Executive Director** will conduct, or arrange to be conducted, Client interviews to determine that services were actually provided as reported.

(b) The **Executive Director** will conduct, or arrange to be conducted, personnel interviews. The purpose of the interviews is to collect information regarding **SRCS** Agency Responsibility with regulatory matters. **SRCS** may also utilize personnel surveys that focus on regulatory issues.

(c) The **Executive Director** will maintain a log of inquiries and allegations from personnel. The log, in combination with other information, will be used to improve **SRCS** operations.

(4) **Formal Audit Reports**

Formal audit reports shall be prepared by the **CPA**, and if indicated, with the assistance of **SRCS** legal counsel. These reports will be submitted to the **Executive Director** to ensure that he is aware of the results and can take whatever steps necessary to correct past problems and deter them from recurring. The audit or other analytical reports will specifically identify areas where corrective actions are needed and should identify in which cases, if any; subsequent audits or studies would be advisable to ensure that the recommended corrective actions have been implemented and are successful.

(5) **Agency Responsibility with Applicable Fraud Alerts**

The **Executive Director** shall regularly and periodically monitor the issuance of fraud alerts by Office of the Inspector General of the Department of Health and Human Services. Any and all fraud alerts so issued shall be carefully considered by the **Executive Director** and, if requested, by **SRCS** legal counsel. **SRCS** shall revise and amend this Agency Responsibility Policy, as necessary, in accordance with such fraud alerts. In addition, **SRCS** shall immediately cease and correct any conduct applicable to **SRCS** and criticized in any such a fraud alert.

(6) **External Audits**

SRCS may request individuals outside of the organization to conduct audits of practices relating to the Agency Responsibility Program. This may include asking the independent **CPA** firm, in its annual audit, to focus specific efforts on one or more aspects of **SRCS** operations, such as a **billing** practice. It could also include asking an outside professional to review records.

(7) **Retention of Records and Reports**

All records and reports created in conjunction with **SRCS** adherence to the Agency Responsibility Policy is confidential to the extent allowed by law. These records/reports shall be maintained by **SRCS** through the Agency Compliance Officer, in a secure location until such time as the Agency Compliance Officer, in consultation with the **Executive Director** and legal counsel, determines that the destruction of such documentation is appropriate.

(8) **Investigation by Policy Regarding Federal, State and Local Entities**

SRCS will comply with relevant laws and regulations regarding formal investigations by governmental authorities. **SRCS** policy, which is described in Part II of the Agency Responsibility Program, is for its staff to seek legal advice as soon as it is aware of an investigation and to fully cooperate with the investigation to the extent required by law. Personnel are not to destroy relevant materials, delay providing information or otherwise inhibit the investigation. Personnel have the

right to ask **SRCS** for legal advice prior to being interviewed during such an investigation.

Shepherds Recovery Counseling Services Inc.	Policy and Procedures
Policy Type:- Aspire To Excellence	Policy Number: ATE - 148
Subject:- Role of the Agency Compliance Officer	Adopted: 06/10/2017
Section:- (1.a.9d)	Effective: 07/10/2018
Approved By:- <i>Jemi Rolimi</i>	Revised: 08/12/2020

► **Role of the Agency Compliance Officer**

→ Policy: - Much of the person's role relating to health care fraud and abuse is described in Part I of this Manual. As stated in Part I the **Executive Director** will handle inquiries and allegations from personnel, calls, and prepare and present reports for the agencies documentation. Other specific duties of the **Executive Director** include the tasks shown below.

1. The **Executive Director** will conduct, or arrange to be conducted, Client interviews to determine that services were actually provided as reported.
2. The **Executive Director** will conduct, or arrange to be conducted, personnel interviews. The purpose of the interviews is to collect information regarding **SRCS** compliance with regulatory matters. **SRCS** may also utilize personnel surveys that focus on regulatory issues.
3. The **Executive Director** will maintain a log of allegations from personnel. The log, in combination with other information, will be used to improve the **SRCS** operations.
4. Conduct interviews with staff concerning regulatory compliance issues.
5. Review audit reports completed by **SRCS**.
6. Handle investigations regarding inquiries and allegations received from personnel.
7. Code of Ethics; Resolving Ethical Issues; Confidentiality; Professional Responsibility of Providers; Rights of Clients; Health/Safety (Pamphlet); Cultural Competency; Person/Family Centered Services (Brochure); Prevention of Violence in Workplace; Home Based Safety Training; Reporting Abuse/Neglect; Suicide Intervention; Critical Incident Reporting; Professional Conduct; Clinical Paperwork and Record Keeping. (**SRCS agency**) requires Mental Health Therapist/Contract Therapist to complete 20 hours of continuing educational units as required renewing their LPC each year.

Shepherds Recovery Counseling Services Inc.	Policy and Procedures
Policy Type:- Aspire to Excellence	Policy Number: ATE - 149
Subject:- Succession Planning	Adopted: 01/27/2019
Section:- (1.a.3(m))	Effective: 02/10/2020
Approved By:- <i>Jemi Rotimi</i>	Revised: 08/12/2020

► **Succession Planning**

→ A change in executive leadership is inevitable for all organizations and can be a very challenging time. Therefore, it is the policy of the **SRCS agency** to be prepared for an eventual permanent change in leadership – either planned or unplanned – to insure the stability and accountability of the organization until such time as new permanent leadership is identified. The **Compliance Officer** shall be responsible for implementing this policy and its related procedures.

It is also the **policy** of the **Leadership terms** to assess the permanent leadership needs of the agency to help ensure the selection of a qualified and capable leader who is a good fit for the agency’s **mission, vision, values, goals, and objectives**; who has the necessary skills for the organization’s leadership; and who has the qualifications needed to lead a **SRCS** agency that has to meet the agency requirements.

To ensure that the agency’s operations are not interrupted while the leadership terms look and recruit a permanent executive director. The interim executive director shall ensure that the agency continues to operate without disruption and that all agency commitments previously made are adequately executed, including but not limited to, approved of new clients applications, contracts, licenses, certifications.

It is also the policy of (**SRCS agency**) to develop a diverse pool of candidates and consider at least five (5) finalist candidates for its permanent executive director position. (**SRCS agency**) shall implement an **external** recruitment and selection process, while at the same time encouraging the professional development and advancement of current employees. The interim executive director and any other interested candidates are encouraged to submit their qualifications for review and consideration by the search committee according to the guidelines established for the search and recruitment process.

→ **PROCEDURES:**

1. For a temporary change in executive leadership (i.e., illness or leave of absence for **30** days or less), the **Compliance Officer** shall temporarily be in the charge of the daily operations and essential duties of **Executive Director**.
2. In the event the executive director of **SRCS agency** is no longer able to serve in this position (i.e. leaves the position permanently), the Executive Committee shall appoint an interim executive director or acting executive director.
3. In the event that a permanent change in leadership is required, the Leadership terms shall appoint an Executive Transition Committee within fifteen (15) business days. This Committee shall be comprised of at least two members of the Executive Committee, and two members of the Personnel Committee. It shall be the responsibility of this committee to implement the following preliminary transition plan:
 - Review the agency's business plan and conduct a brief assessment of agency strengths, weaknesses, opportunities, and threats to identify priority issues that may need to be addressed during the transition process and to identify attributes and characteristics that are important to consider in the selection of the next permanent leader.
 - Establish a timeframe and plan for recruitment and selection process.
 - Refer to the **Executive Director** Job Description for sample of job description and qualifications.
4. In the event that an executive transition simultaneously involves the executive director and other key management staff, the Leadership Team may also consider temporarily subcontracting some of the agency functions from a trained consultant or other organizations.

Shepherds Recovery Counseling Services Inc.	Policy and Procedures
Policy Type:- Aspire To Excellence	Policy Number: ATE - 150
Subject:- Certificate of Insurance	Adopted: 06/10/2017
Section:-	Effective: 07/10/2018
Approved By:- <i>Jemi Rolimi</i>	Revised: 08/12/2020

► **PURPOSE:-** Certificate of Insurance

→**OBJECTIVE:** Certificate of Insurance

→**PURPOSE:** To ensure that **SRCS Agency** is adequately covered against liabilities resulting from claims incurred in the operation of its business.

→**POLICY:**

(**SRCS Agency**) carries at least the minimum levels of all required liability insurance protection.

→**PROCEDURES:**

1. The types and amounts of insurance obtained shall be consistent with industry standards and/or regulations.
2. Copies of insurance certificates/policies shall be kept in the **SRCS Agency** business office located at **7117 E. Reno Avenue, Midwest City, Ok 73110**
3. Insurance certificates/policies shall be reviewed annually.
4. **SRCS Agency** shall obtain insurance coverage as follows:
 - a. Comprehensive General Liability Insurance shall be carried for all employees, as a protection to them and clients from losses due to negligence and/or carelessness.
 - b. Property Insurance shall be carried on all **SRCS Agency** buildings and contents, if applicable.
 - c. Professional Liability/Malpractice Insurance shall be carried for all licensed personnel, as required.
 - d. Workers Compensation Insurance shall be carried for all employees, while on duty, whether they work in the **SRCS Agency** office or in clients' homes.
 - e. Automobile liability shall be carried on all agency vehicles and shall provide coverage against under-insured/uninsured motorists.
5. All contract personnel, who provide hands-on care, shall carry their own Professional Liability Insurance, Worker's Compensation Insurance, and auto insurance.

Shepherds Recovery Counseling Services Inc.	Policy and Procedures
Policy Type:- Aspire To Excellence	Policy Number: ATE - 151
Subject:- Display of Certificate of Accreditation	Adopted: 06/10/2017
Section:- (1.a.10)	Effective: 07/10/2018
Approved By:- <i>Jemi Rolimi</i>	Revised: 08/12/2020

► **PURPOSE:** To identify the accreditation of the **SRCS Agency** and to comply with established regulations.

→**POLICY:** **SRCS Agency** displays its Certificate of Accreditation prominently at the business office located at **7117 E. Reno Avenue, Midwest City, Ok 73110**

→**PROCEDURES**

1. The certificate(s) shall be displayed in a conspicuous place.
2. Certificate(s) shall be kept current.
3. Certificate(s) shall be maintained and updated by the **Executive Director**, required.

Shepherds Recovery Counseling Services Inc.	Policy and Procedures
Policy Type:- Aspire To Excellence	Policy Number: ATE - 152
Subject:- Service Area	Adopted: 8/27/2003
Section:- (1.a.12)	Effective: 07/10/2018
Approved By:- <i>Jemi Rolimi</i>	Revised: 08/12/2020

►**PURPOSE:** To identify the service area(s) in which **SRCS Agency** delivers services and/or is licensed to operate.

→**POLICY**

1. **SRCS Agency** provides services in the following areas:
 Greater Oklahoma City metropolitan area and its immediate surrounding areas to include the communities of **Bethany, Warr Acres, Midwest City, Del City, Spencer, Edmond, Moore and Norman.**
2. Only those patients who are within **SRCS Agency** service area will be accepted for service.

→**DEFINITIONS**

1. Service Area

Service area refers to the geographic area within which an agency/company provides service and/or is licensed to provide services.

→**PROCEDURES**

1. Requests for service, service cancellations and/or changes to service schedules can be made by accessing one or more of the following contacts:
 - a. **SRCS Agency** business office @ **405-610-5442**
 - b. **SRCS Agency** fax @ **405-610-5243**
 - c. mailing address: **7117 E. Reno Avenue, Midwest City, Ok 73110**
2. Adequate staff shall be maintained, within the **SRCS Agency** service area(s), to:
 - a. perform home based counseling service activities;
 - b. perform home based rehabilitation service activities;
 - c. supervise the effectiveness and efficiency of services delivered and,
 - d. Conduct administrative functions.

Shepherds Recovery Counseling Services Inc.	Policy and Procedures
Policy Type:- Aspire To Excellence	Policy Number: ATE - 153
Subject:- Code of Ethical Conduct	Adopted: 11/12/2018
Section:- (1.a.22)	Effective: 01/10/2019
Approved By:- <i>Jemi Rotimi</i>	Revised: 08/12/2020

This Code of Conduct has been adopted by the **Executive Director** of **SRCS Agency**. The purpose of this Code of Conduct is to provide standards by which employees of the **SRCS Agency** must conduct themselves in order to protect and promote **SRCS Agency**-wide integrity and to enhance the **SRCS Agency's** ability to achieve the mission of **SRCS Agency**.

D. Principle 1 – Legal Compliance

SRCS Agency will strive to ensure all activity by or on behalf of the **SRCS Agency** is in compliance with applicable laws, rules and regulations.

The following standards are intended to provide guidance to employees and management to assist them in their obligation to comply with applicable laws, rules and regulations. The standards are neither exclusive nor complete. Employees are required to comply with all applicable laws, rules and regulations, whether or not specifically addressed in these policies. All questions regarding the existence of, interpretation or application of this plan should be directed to **SRCS's Agency** Compliance Officer.

All **SRCS** employees will not sign any legal documents on behalf of clients or on behalf of the **SRCS Agency**,

E. Standard 1.1 – Tax

As for profit entity, **SRCS Agency** has a legal and ethical obligation to act in compliance with applicable laws, rules and regulations, to engage in activities in furtherance of its charitable purpose, and to ensure that its resources are used in a manner which furthers the public good rather than the private for personal interests of any individual. Consequently, **SRCS Agency** and its employees will avoid compensation arrangements and excess of fair market value, will accurately report payments to appropriate taxing authorities, and will file all tax and information returns in a manner consistent with applicable laws.

F. Standard 1.2 - Fraud, Abuse, and Waste

SRCS Agency expects its employees to refrain from conduct which may violate the fraud and abuse laws. These laws prohibit (1) direct, indirect or disguised

payments in exchange for the referral of patients; (2) the submission of false, fraudulent or misleading claims to any governmental entity or third party payer, including claims for services not rendered, claims which characterize the service differently than the service actually rendered, or plans which do not otherwise comply with applicable program or contractual requirements; and (3) making false representations to any person or entity in order to gain or retain participation in a program or to obtain payment for any service. **SRCS Agency** expects its employees to refrain from conduct that may cause unnecessary waste.

G. Standard 1.3 – Lobbying/Political Activity

SRCS Agency expects each of its employees to refrain from engaging in activities which may jeopardize the tax exempt status of **SRCS Agency**, including a variety of lobbying and political activities.

- a. No individual may make any agreement to contribute any money, property, or services of any officer or employee at **SRCS's Agency** expense to any political candidate, party **SRCS Agency**, or committee for individual in violation of any applicable law. Officers and employees may personally participate in and contribute to political agencies or campaigns, but they must do so as individuals, not as representatives of **SRCS Agency**, and they must use their own funds.
- b. Where its experience may be helpful, **SRCS Agency** may publicly offer recommendations concerning legislation or regulations being considered. In addition, it may analyze and take public positions on issues that have a relationship to the operations of **SRCS Agency** when **SRCS's** experience contributes to the understanding of such issues.
- c. **SRCS Agency** has many contacts and dealings with governmental bodies and officials. All such contacts and transaction shall be conducted in an honest and ethical manner. Any attempt to influence the decision-making process of governmental bodies or officials by an improper offer of any benefit is absolutely prohibited. Any request for demands by any governmental representative for any improper benefits should be immediately reported to **SRCS's Agency** Compliance Officer.

H. Standard 1.4 – Environmental

It is the policy of **SRCS Agency** to manage and operate its business in a manner which respects our environment conserves natural resources. **SRCS's Agency** employees will strive to utilize resources appropriately and efficiently, to recycle where possible and otherwise dispose of all waste in accordance with applicable laws and regulations, and to work cooperatively with the appropriate authorities to remedy any environmental contamination for which **SRCS Agency** may be responsible.

I. Standard 1.5 – Discrimination

SRCS Agency believes that the fair and equitable treatment of employees, people we serve and another person is critical to fulfilling its vision and goals. It is the policy of the **SRCS** to treat the people we serve without regard to the race, color, religion, sex, ethnic origin, age socioeconomic, or abilities of such person, or any other classification prohibited by law.

It is the policy of **SRCS Agency** to recruit, hire, train, promote, assigning, transfer, layoff, recall and terminated employees based on their own ability, achievement, experience and conduct without regard to race, color, religion, sex, ethnic origin, age, socioeconomic status, or abilities, or any other classification prohibited by law.

No form of harassment or discrimination on the basis of sex, race, color, abilities, age, religion, socioeconomic status, or ethnic origin or abilities or any other classification prohibited by law will be permitted. Each allegation of harassment or discrimination will be properly investigated in accordance with applicable **SRCS Agency** personnel policies.

J. Principle 2 – Business Ethics

In furtherance of the **SRCS's** Agency commitment to the high standards of business ethics and integrity, employees will accurately and honestly represent the **SRCS Agency** and will not engage in any activity intended to defraud anyone of money, property or services.

The standards set forth below are designed to provide guidance to ensure that its business activities reflect the high standards of business ethics and integrity. Employee conduct not specifically addressed by these standards must be consistent with Principle 2.

K. Standard 2.1 Honest Communication

The **SRCS Agency** requires candor and honesty from individuals in the performance of their responsibilities and in communication with its attorneys, regulators and auditors. No employee shall make false or misleading statements to any individual whom we serve or other person or entity doing business with the **SRCS Agency** about any individuals, persons or entities doing business or competing with the **SRCS Agency**, or about the products or services of the **SRCS Agency** or its competitors.

L. Standard 2.2 – Misappropriation of Proprietary Information

The **SRCS's Agency** employees shall not misappropriate confidential or proprietary information belonging to another person or entity nor utilize any publication, documents, computer program, information or product in violation of the third party's interest in such product. All of the **SRCS's Agency** employees are responsible to ensure they do not improperly copy for their own use documents or computer programs in violation of applicable copyright laws or licensing agreements. All employees must comply with the **SRCS's Agency** confidentiality policy. Employee shall not utilize confidential business information obtained from competitors, including foster parent lists, contracts or other information in violation of a covenant not to compete, prior employment agreements, or any other manner likely to provide an unfair competitive advantage to the **SRCS Agency**.

M. Principle 3 - Confidentiality

SRCS's Agency employees shall strive to maintain confidential information in accordance with applicable legal and ethical standards.

SRCS Agency and its employees are in a position to have access to a broad variety of confidential, sensitive and proprietary information, the inappropriate release of which could be injurious to the people we serve, **SRCS's Agency** business partners and **SRCS Agency** itself. Every employee of **SRCS Agency** has an obligation to actively protect and safeguard confidential, sensitive and proprietary information in a manner designed to prevent the unauthorized disclosure of information.

N. Standard 3.1 – Information Related to the People We Serve

All employees of **SRCS Agency** have an obligation to conduct themselves in accordance with the principle of maintaining the confidentiality of information from within about people we serve in accordance with all applicable laws and regulations. Employee shall refrain from revealing any such personal or confidential information unless in accordance with applicable law and **SRCS's Agency** policies. If questions arise regarding an obligation to maintain the confidentiality of information or the appropriateness of releasing information, employee should seek guidance from **SRCS Agency** management or **SRCS's Agency** Compliance Officer.

The United States Department of Health and Human Services (HHS) has issued standards for the Privacy of Individually Identifiable Health Information (Privacy Rule) which became effective on April 14, 2003, establishing a set of national standards for the protection of health information. The Privacy Rule standards address the use and disclosure of Protected Health Information as well as standards for an individual's privacy rights to understand and control how their health information is used. The Office of Civil Rights, within HHS has the responsibility for implementing and enforcing the Health Insurance Portability and Accountability Act (HIPAA) Privacy regulations. All employees receive training related to confidentiality and HIPAA Privacy regulations prior to being responsible

for Protected Health Information and have an obligation to follow all applicable confidentiality and HIPAA policies and procedures. These policies and procedures are related to confidentiality, individual access and amendment of Protected Health Information and communication preferences.

If questions arise regarding an obligation to maintain the confidentiality of information or the appropriateness of releasing information, employee should seek guidance from **SRCS Agency** management or **SRCS's Agency** corporate compliance officer. Employees should contact the **SRCS Agency** management or the corporate compliance officer if they have questions about a specific **HIPAA** related policy or procedure.

All licensees shall explain the required limitations of confidentiality imposed by a mandating authority when working with Patients who have been mandated for counseling services. Licensees shall also explain what type of information and with whom that information is shared prior to the beginning of counseling. The mandated Patient has the right to refuse services and the licensee shall, to the best of their ability, explain the consequences possibly imposed by the mandating authority of refusing the counseling services.

At no time shall licenses conduct searches using internet-based search engines and/or social media applications to gather information about Patients.

O. Standard 3.3 - Proprietary Information

Information, ideas and intellectual property assets **SRCS Agency** are important to organizational success. Information pertaining to **SRCS's Agency** competitive position or business strategies, payments in reimbursement information, and information relating to negotiations with employees or third parties should be protected and shared only with

While not all inclusive, the following will serve as a guide to the types of activities by a covered person, or hold member of employees having a need to know such information in order to perform their job responsibilities. Employees should exercise care to ensure that intellectual property rights, including patents, trademarks, copyrights and software is carefully maintained and managed to preserve and protect its value.

P. Standard 3.4 - Personnel Actions/Decisions

The salary, benefits and other personnel information relating to employees shall be treated as confidential. Personnel files, payroll information, disciplinary matters and similar information shall be maintained in a manner designed to ensure confidentiality in accordance with applicable laws. Employees will exercise due

care to prevent the release or sharing of information be on those persons who may meet such information to fulfill their job function.

Q. Principle 4 - Conflicts of Interest

Advisory, officers and key employees owe a duty of undivided and unqualified loyalty to the **SRCS Agency**. Persons holding such positions may not use their positions to profit personally or to assist others and profiting in any way at the expense of **SRCS Agency**.

All covered persons are expected to regulate their activities so as to avoid actual impropriety and/or the appearance of impropriety which might arise from the influence of those activities on business decisions of **SRCS Agency**, or from disclosure or private use of business affairs or plans of **SRCS Agency**.

R. Standard 4.1 - Outside Financial Interests such person, which might cause conflicts of interest:

- a. Ownership in or employment by any outside concern which does business with **SRCS Agency**. This does not apply to stock or other investments held in a publicly held corporation, provided the value of the stock or other investments does not exceed 5% of the corporation's stock. **SRCS Agency** may, following a review of the relevant facts, permit ownership interests which exceed these amounts if management concludes such ownership interests will not adversely impact **SRCS's Agency** business interest or the judgment of the covered person.
- b. Conduct of any business not on behalf of **SRCS Agency**, with any vendor, supplier, contractor, or **SRCS Agency**, or any of their officers or employees.
- c. Representation of **SRCS Agency** by a covered person in a transaction in which he or she or a hold member has a substantial personal interest.
- d. Disclosure or use of confidential, special or inside information of or about **SRCS Agency**, particularly for personal profit or advantage of the covered person or hold member.
- e. Competition with **SRCS Agency** by a covered person directly or indirectly or in the purchase, sale or ownership of property or property rights or interests, or business or investment opportunities.

S. Standard 4.2 - Services for Competitors/Vendors

No cover person shall perform or render services for any competitor of **SRCS Agency** or for any **SRCS Agency** with which **SRCS Agency** does business or which seeks to do business with the **SRCS Agency** outside of the normal course of his/her employment with **SRCS Agency** without the approval of the executive director. Nor shall any such employee be a trustee, officer, or consultant of such an **SRCS Agency**, nor permitted his/her name to be used in any fashion that would

tend to indicate a business connection with such **SRCS Agency**.

T. Standard 4.3 - Participation on Boards of Advisory

- a. The covered person must attain approval from the Executive Director prior to serving as a member of the Board of Advisory of any **SRCS Agency** whose interests may conflict with those of **SRCS Agency**.
- b. A covered person who is asked to serve on the Board of Advisory of any **SRCS Agency** whose interest would not impact **SRCS Agency** (for example, civic, most charitable, fraternal and so forth) will not be required to obtain such approval.
- c. All fees/compensation (other than reimbursement for expenses arising from Board participation) that I receive for Board services provided during normal work time shall be paid directly to **SRCS Agency**.
- d. A covered person must disclose all Board of Advisory activities in the annual conflict of interest disclosure statement.
- e. **SRCS Agency** retains the right to prohibit membership on any Board of Advisory where such membership might conflict with best interest of **SRCS Agency**.
- f. Questions regarding whether or not Board participation might present a conflict of interest should be discussed with a member of the Executive Management Team.

U. Standard 4.4 - Honoraria

Employees are, with the permission of their supervisor, encouraged to participate as faculty and speakers at educational programs and functions. However, any honorary of in excess of \$100 shall be turned over to **SRCS Agency** unless the employee used paid time off to attend the program or that portion of the program for which the honoraria is paid.

V. Standard 4.5 - Dual Relationships

A multiple relationship occurs when an employee is in a professional role with a person and (1) at the same time is in another role with the same person, (2) at the same time is in a relationship with a person closely associated with or related to the person with whom the employee has the professional relationship, or (3) promises to enter into another relationship in the future with the person or a person closely associated with or related to the person. An employee refrains from entering into a multiple relationship if the multiple relationships could reasonably be expected to impair the employee's objectivity, competence, or effectiveness in performing his or her functions as an employee, or otherwise risks exploitation or harm to the person with whom the professional relationship exists. Multiple relationships that would not reasonably be expected to cause impairment or risk exploitation or harm are not unethical. If an employee finds that, due to unforeseen factors, a potentially

harmful multiple relationships have arisen, the employee takes reasonable steps to resolve it with due regard for the best interests of the affected person and maximal compliance with their professional ethics code or **SRCS Agency** Code of Ethics. All licensees shall abide by the standards regarding establishing social media-based relationships with patients. They shall not engage in personal virtual (social media driven) relationships with Patients. Licensees who engage in social media driven relationship with ex-patients shall use best Clinical judgment in determining whether to enter into this new relationship. The new relationship must not be exploitative toward the ex-Patient.

Principle 5 – Business Relationships

Business transactions with vendors, contractors and other third party shall be transacted free from authors or solicitation of gifts and favors or other improper inducements in exchange for influence or assistance in a transaction.

The standards set forth below are intended to guide key employees in determining the appropriateness of the listed activities are behaviors within the context of **SRCS's** agency business relationships, including relationships with vendors, providers, contractors, third party payers and governmental entities. It is the intent of **SRCS Agency** that this policy be construed broadly to avoid even the appearance of improper activity. If there is any better concern about whether specific conduct are activities are ethical or otherwise appropriate, you should contact the agencies compliance officer.

W. Standard 5.1 – Gifts and Gratuities

In it is the (**SRCS's Agency**) desire to all times preserve and protect its reputation and to avoid the appearance of impropriety. Consequently:

- a. **Gifts from people whom we serve.** Employees are prohibited from soliciting tips, personal gratuities or gifts from people we serve and their family members, and from accepting monetary tips or gratuities. Employees may accept gratuities and gifts of a nominal value from the people we serve and their family members. If a person we serve or another individual wishes to present a monetary gift, he/she should be referred to a member of the executive management team.
- b. **Gifts influencing decision-making.** Employees shall not accept gifts, favors, services, entertainment for other things of value to the extent that decision-making or actions affecting the **SRCS** might be influenced. Similarly, the offer for giving of money, services or other things of value with the expectation of influencing the judgment or decision-making process of any purchaser, supplier, customer, government official or other person by the **SRCS** is absolutely prohibited. Any such conduct must be reported immediately either to the Executive Director or the **SRCS's** compliance officer.

- c. **Gifts from existing vendors.** Employees may retain gifts from vendors, which have a nominal value. **SRCS Agency** has made no attempt to define “nominal” as a specific dollar value. Rather, the **SRCS** expects its employees to exercise good judgment and discretion in accepting gifts). If an employee has any concern whether gift should be accepted, the employee should consult with his/her supervisor. To the extent possible, these gifts should be shared with the employees’ coworkers. Employees shall not accept excessive gifts, meals, expensive entertainment or other authors of goods or services which have more than a nominal value nor may solicit us from vendors, suppliers, contractors or other persons.
- d. **Vendor sponsored entertainment.** At a vendor’s invitation, an individual may accept meals or refreshments at the vendor’s expense. Occasional attendance at a local theater or sporting event, or similar entertainment as enter expense may also be accepted. In most circumstances, a regular business representative of the vendor should be in attendance with the employee.

Nothing in this policy shall prohibit a supervisor from establishing stricter rules relating to the acceptance of gifts, gratuities or other things of value from vendors.

X. Standard 5.2 – Workshops, Seminars and Training Sessions

Attendance at local, vendor-sponsored workshops, seminars and training sessions is permitted. Attendance, at vendor expense, act out-of-town seminars, workshops in training sessions is permitted only with the approval of an employee’s supervisor.

Y. Standard 5.3 – Contracting

Employees may not utilize “insider” information for any business activity conducted by or on behalf of the **SRCS**. All business relations with contractors must be conducted an arm’s length both in fact and an appearance and in compliance with the **SRCS’s** policies and procedures. Employees must disclose personal relationships and business activities with contractor personnel, which may be construed by an impartial observer as influencing the employees’ performance or duties. Employees have a responsibility to obtain clarification from an edge meant employees on questionable issues which may arise and to comply, where applicable, with **SRCS’s Agency** conflict of interest policy.

Z. Standard 5.4 – Business Inducements

(**SRCS’s Agency**) employees shall not see the gain any advantage through the improper use of payments, business courtesies or other inducements. Offering, giving, soliciting or receiving any form of a ride or other improper payment is prohibited.

Appropriate commissions, rebates, discounts and allowances are customary in acceptable business inducements provided that they are approved by **SRCS's** management and that they do not constitute illegal or unethical payments. Any such payments must be a reasonable in value, competitively justified, properly documented, and made to the business entity to whom the original agreement or invoice was made are issued. Such payment should not be made to individual employees or agents of business entities.

In addition, employees may provide gifts, entertainment and meals of nominal value to the **SRCS's** customers, current and prospective business partners and other persons when such activities have a legitimate business purpose and are reasonable and consistent with all applicable laws.

Principle 6 – Protection of Assets

All employees will strive to preserve and protect the **SRCS's** assets by making prudent an effective use of **SRCS's** resources and properly and accurately reporting its financial condition.

The standards set forth below are intended to guide key employees by articulating **SRCS's Agency** expectations as they relate to activities or behaviors which may impact **SRCS's Agency** financial health which reflect a reasonable and appropriate use of the assets of a nonprofit entity.

Standard 6.1 – Internal Control

(**SRCS Agency**) has established control standards and procedures to ensure that assets are protected, improperly used and that financial records and reports are accurate and reliable. All employees of the **SRCS** share the responsibility for maintaining and complying with required internal controls.

Standard 6.2 – Financial Reporting

All financial reports, accounting records, research reports, expense accounts, other documents must accurately and clearly represent the relevant facts or the true nature of the transaction. Improper or fraudulent accounting, documentation or financial reporting is contrary to the policy of **SRCS Agency** and may be in violation of applicable laws.

Standard 6.3 – Travel and Entertainment

Travel and entertainment expenses should be consistent with the employee's job responsibility and the agencies needs and resources. It is **SRCS's** policies that an employee should not suffer a financial losses or if financial gain as a result of business travel and entertainment. Employees are expected to exercise reasonable judgment in the use of **SRCS's** assets and to spend **SRCS's Agency** assets as

carefully as they would spend their home. Employees must also comply with **SRCS's** policies relating to travel and entertainment expense.

Standard 6.4 – Personal use and SRCS's Agency assets

All property in business of **SRCS Agency** shall be conducted in a manner designed to further the **SRCS's** interest rather than the personal interest of an individual employee. Employees are prohibited from the unauthorized use or taking of **SRCS** equipment, supplies, materials, assets, or services. Prior to engaging in any activity on company time which will result in remuneration to the employee or the use of **SRCS** equipment, supplies, materials, assets, or services for personal or non-work related purposes, employee shall obtain the approval of a member of the Executive Management Team.

Principle 7 – Professional Responsibilities

All therapists are expected to adhere to the code of ethical practice and professional conduct as specified in **Section 437-5-01** of the Oklahoma Administrative Code.

The rules of ethical practice and conduct shall apply to the conduct of all licensed counselor.

Standard 7.1 – Integrity

All staff members of **SRCS Agency** will carry out their job and professional responsibilities with integrity, treating those with whom they work or have professional relationships in a dignified, respectful, honest and fair manner.

Standard 7.2 – Propriety

All employees will maintain high standards of personal moral conduct when engaged in **SRCS** business and professional activities. Personal standards and conduct are private matters except when such conduct may compromise work or professional responsibilities, or reduce public confidence in the **SRCS's Agency** mission.

Standard 7.3 – Avoiding Harm

All employees will act in the best interest of those toward whom they have professional responsibilities, to include avoiding doing harm. It is expected that employees conduct themselves in a manner not to inflict either emotional or physical harm toward any person, to include patients (or prospective patients), family members or significant others. Employees should never partake in punching, shaking, striking, spitting, swearing, verbal or physical abuse, to include racial or personal slights, or insensitivity in one's interactions with a Patient or others.

Standard 7.4 – Non-Discrimination

1. **SRCS Agency** employees will not engage in and will act to prevent discriminatory behaviors based on age, gender, race, ethnicity, national origin, religion, sexual orientation, disability, socioeconomic status, HIV/AIDS status, veteran's status, or any basis proscribed by law.
2. Where personal or cultural differences could significantly affect best practice intervention with a particular individual, family or group, employees will seek and obtain the supervision and training necessary to ensure that the intervention is unbiased, competent and culturally appropriate.

Standard 7.5 – Sexual Harassment

1. **SRCS Agency** employees will not engage in and will act to prevent sexual harassment.
2. **SRCS Agency** employees will follow **SRCS Agency** personnel policy on sexual harassment.

Standard 7.6 – Duality of Relationships

Employees will take into consideration the potential harm that intimate, social or other non-professional contacts and relationships with consumers, their family members, foster parents, colleagues and supervisees could have on those with whom may have a professional relationship. Employees should be aware that any relationships, outside of a professional one, could affect professional objectivity, judgment and performance.

1. Employees will avoid any conduct that would lead a reasonable person to conclude that the employee might be biased or motivated by personal interest in the performance of their duties.
2. Whenever feasible, employees should avoid professional relationships when a pre-existing non-professional relationship is present.
3. Employees should discuss past, existing and potential dual relationship concerns with their supervisor and resolve them in a manner that avoids harming and/or exploiting affected persons.

Standard 7.7 – Personal Problems

1. Employees will not perform professional activities when they know or should know that personal problems, mental health concerns or substance abuse/dependents could impede professional judgment and performance.
2. When such problems could affect performance, employees should inform their supervisor who will assist in determining if the employee should limit, suspend or terminate their professional duties. Employees are strongly

encouraged to obtain professional help to alleviate performance issues due to personal problems.

Standard 7.8 – Documentation of Professional Work

1. **SRCS Agency** professionals should accurately and truthfully document their professional work according to an **SRCS Agency** policy, licensing and/or legal requirements in order to ensure accountability and continuity in provision of services to the consumer.
2. Professional employees recognize the expectation to maintain documentation in a complete and thorough manner.
3. Employees will meet the professional code of conduct as it pertains to licensure around documentation issues.
4. Employees acknowledge that the lack of maintaining completion of documentation constitutes a violation of professional practice and maybe a violation of Patient's rights (such as not having a current individualized service plan).
5. Employees acknowledge that a failure to maintain a professional standard of documentation may constitute a breach of professional ethics and result in a report to the state regulatory board and/or **SRCS Agency**-administered disciplinary action.
6. Employees acknowledge the responsibility in witnessing documents and agree to follow ethical guidelines.