



Howard Center Code of Ethics

Principle 01. - Responsibility for Client Welfare

Howard Center employees, when acting within the scope of their responsibilities as agents of the agency, recognize the important role we serve for our clients. Our primary duty is to do no harm, and our commitment is to work toward improving the health and well-being of individuals, families and our community.

1.01 Commitment to Clients

Howard Center employees' primary responsibility is to promote the well-being of clients. In general, clients' interests are primary. However, a responsibility to the larger society or specific legal obligations may on limited occasions supersede the loyalty owed clients, and clients should be so advised. (Examples include mandatory child-abuse reporting statutes and threatened harm to self or others.)

1.02 Self-Determination and Respecting Others

Howard Center employees will respect and promote the right of clients to self-determination and will assist clients in their efforts to identify and clarify their goals. Howard Center employees may limit clients' right to self-determination, when, in the employee's professional judgment, clients' actions or potential actions pose a serious, foreseeable, and imminent risk to themselves or others. In their work-related activities, Howard Center employees will respect the rights of others to hold values, attitudes, and opinions that differ from their own.

1.03 Harassment

Howard Center employees will not knowingly engage in behavior that is harassing or demeaning to persons with whom they interact in their work based on factors such as a persons' age, gender, race, ethnicity, national origin, religion, sexual orientation, disability, language, or socioeconomic status.

1.04 Derogatory Language

Howard Center employees should not use derogatory language in their written or verbal communications to or about clients, and should use accurate and respectful language in all communications to and about clients.

1.05 Physical Contact

Howard Center employees should not engage in physical contact with clients that is not professionally justifiable and that causes harm, including psychological harm to the client. Howard Center employees who engage in appropriate physical

contact with clients are responsible for setting clear, appropriate, and culturally sensitive boundaries that govern such physical contact.

1.06 Avoiding Harm

Howard Center employees will take reasonable steps to avoid harming their patients or clients, research participants, students, and others with whom they work, and to minimize harm where it is foreseeable, unavoidable, or professionally justifiable.

1.07 Professional Relationship

Howard Center employees will provide diagnostic, therapeutic, teaching, research, supervisory, consultative, or other professional services only in the context of a defined professional relationship or role.

1.08 Informed Consent for Services

(a) Howard Center employees will obtain appropriate informed consent to therapy or related procedures, except in instances in which capacity to consent is in question and there is potential for immediate harm to self or others. Language will be used that is reasonably understandable to participants. The content of informed consent will vary depending on many circumstances; however, informed consent generally implies that the person (1) has the legal capacity to consent, (2) has been informed of significant information concerning the procedure, (3) has freely and without undue influence expressed consent, and (4) consent has been appropriately documented.

(b) When persons are legally incapable of giving informed consent, Howard Center employees will obtain informed permission from a legally authorized person, if such substitute consent is permitted by law.

(c) In addition, Howard Center employees will (1) inform those persons who are legally incapable of giving informed consent about the proposed intervention in a manner commensurate with the persons' psychological capacities, (2) seek their assent to those interventions, and (3) consider such persons' preferences and best interests.

1.09 Describing the Nature and Results of Services Offered

(a) When Howard Center employees provide assessment, evaluation, treatment, counseling, supervision, teaching, consultation, research, or other psychological services to an individual, a group, or an organization, they will use language that is reasonably understandable to the recipient of those services, including appropriate information beforehand about the nature of such services and appropriate information later about results and conclusions.

(b) If Howard Center employees will be precluded by law or by organizational roles from providing such information to particular individuals or groups, they will so inform those individuals or groups at the outset of the service.

1.10 Multiple Relationships

(a) In many communities and situations, it may not be feasible or reasonable for Howard Center employees to avoid social or other nonprofessional

contacts with persons such as patients, clients, students, supervisees, or research participants. In instances when dual or multiple relationships are unavoidable, Howard Center employees should take steps to set appropriate boundaries. Howard Center employees must always be sensitive to the potential harmful effects of other contacts on their work and on those persons with whom they deal. A Howard Center employee will refrain from entering into or promising another personal, professional, financial, or other relationship with such persons if it appears likely that such a relationship might impair the employee's objectivity or otherwise interfere with the employee's effectively performing his or her functions, or might harm or exploit the other party. Howard Center employees **do not enter into sexual relationships with current or former clients or their family members to whom they have personally provided services.**

(b) Likewise, whenever feasible, a Howard Center employee will refrain from taking on professional obligations when preexisting relationships would create a risk of such harm. Howard Center employees will not provide services to a person with whom a prior sexual relationship has existed.

(c) If a Howard Center employee finds that, due to unforeseen factors, a potentially harmful multiple relationship has arisen, the employee will seek supervision to resolve it with due regard for the best interests of the affected person and maximal compliance with the Ethics Code.

1.11 Exploitative Relationships

(a) Howard Center employees will not exploit persons over whom they have supervisory, evaluative, or other authority such as students, supervisees, employees, research participants, and clients or patients.

(b) Howard Center employees will not engage in sexual relationships with students, supervisees, trainees or any other over whom Howard Center employee has evaluative or direct authority, because such relationships are so likely to impair judgment or be exploitative.

1.12 In-Person Solicitation

Howard Center employees will not engage, directly or through agents, in uninvited, personal solicitation of business from actual or potential patients or clients or other persons who because of their particular circumstances are vulnerable to undue influence. However this does not preclude attempting to implement appropriate collateral contacts with significant others for the purpose of benefiting an already engaged patient or client.

1.13 Interruption of Services

(a) Howard Center employees will make reasonable efforts to plan for facilitating care in the event that psychological services are interrupted by factors such as Howard Center employee's illness, death, unavailability, or relocation or by the client's relocation or financial limitations.

(b) When entering into employment or contractual relationships, Howard Center employees will provide for orderly and appropriate resolution of responsibility for

patient or client care in the event that the employment or contractual relationship ends, with paramount consideration given to the welfare of the patient or client.

1.14 Terminating the Professional Relationship

(a) Howard Center employees will not abandon patients or clients.

(b) Howard Center employees will terminate a professional relationship when it becomes reasonably clear that the patient or client no longer needs the service, or is not benefiting from continued service.

(c) Prior to termination for whatever reason, except where precluded by the patient's or client's conduct, Howard Center employees will discuss the patient's or client's views and needs, provide appropriate pre-determination counseling, suggest alternative service providers as appropriate, and take other reasonable steps to facilitate transfer of responsibility to another provider if the patient or client needs one immediately.

(d) Howard Center employees will not terminate services to pursue a social, financial, or sexual relationship with a patient or client.

Principle 02. - Professional Responsibility

Howard Center employees will recognize that a responsibility exists to our clients, co-workers, to the agency, and to our respective professions.

2.01 Organizational Responsibility

Howard Center employees shall maintain respect for the institutional policies and management functions of the organization. Howard Center employees will pursue appropriate means of improving policies when it is in the best interests of the clients served to do so.

2.02 Structuring the Relationship

(a) Howard Center employees will discuss with clients or patients as early as is feasible in the therapeutic relationship appropriate issues, such as the nature and anticipated course of therapy, fees, and confidentiality.

(b) When Howard Center employee's work with clients or patients will be supervised, the above discussion will include that fact, and the name of the supervisor, when the supervisor has clinical responsibility for the case.

(c) When the therapist is a student intern, the client or patient will be informed of that fact.

(d) Howard Center employees will make reasonable efforts to answer clients' questions and to avoid apparent misunderstandings about therapy. Whenever possible, Howard Center employees will provide oral and/or written information, using language that is reasonably understandable to the patient or client.

2.03 Couple and Family Relationships

(a) When a Howard Center employee agrees to provide services to several persons who have a relationship (such as husband and wife or parents and children),

Howard Center employee will attempt to clarify at the outset (1) which of the individuals are patients or clients and (2) the relationship Howard Center employee will have with each person. This clarification includes the role of Howard Center employee and the probable uses of the services provided or the information obtained.

(b) As soon as it becomes apparent that Howard Center employee may be called on to perform potentially conflicting roles (such as marital counselor to husband and wife, and then witness for one party in a divorce proceeding), Howard Center employee will attempt to clarify and adjust or withdraw from providing services that result in a conflict of interest.

2.04 Personal Problems and Conflicts

(a) Howard Center employees will recognize that their personal problems and conflicts (including, but not limited to psychosocial distress, legal problems, or other stressful situations) may interfere with their effectiveness. Accordingly, they will refrain from undertaking an activity when they know or should know that their personal problems are likely to result in harm to a patient, client, colleague, student, research participant, or other person to whom they may owe a professional obligation.

(b) In addition, Howard Center employees have an obligation to be alert to signs of, and to obtain assistance for, their personal problems at an early stage, in order to prevent significantly impaired performance.

(c) When Howard Center employees become aware of personal problems that may interfere with their performing work-related duties adequately, they will take appropriate measures, such as obtaining professional consultation or assistance, and determine whether they should limit, suspend, or terminate their work-related duties.

2.05 Sexual Harassment

(a) Howard Center employees will not engage in sexual harassment of clients. Sexual harassment is unwanted verbal, non-verbal or physical conduct where (1) submission to such conduct is made either explicitly or implicitly a term or condition of the provision of services, (2) submission to or rejection of such conduct by a client is used as a basis for a decision regarding provision of services affecting the individual and, (3) such conduct interferes with the client's therapy or creates an intimidating, hostile or offensive environment.

(b) Howard Center strives to prevent acts of sexual harassment through policy and training of staff and clients, in some programs. Howard Center has developed policy and protocols for how clients can report sexual harassment from staff. Howard Center's HR department will investigate allegations of sexual harassment and determine appropriate follow-up actions.

(c) In determining whether an intimidating, hostile or offensive environment occurred the pattern of conduct must be severe or pervasive enough that a reasonable person would find that it creates an abusive environment and that the person in the environment subjectively perceives the environment to be abusive.

2.06 Misuse of Howard Center Employees' Work

(a) Howard Center employees will not participate in activities in which it appears likely that their skills or data will be misused by others.

(b) If Howard Center employees learn of misuse or misrepresentation of their work, they will take reasonable steps to correct or minimize the misuse or misrepresentation.

2.07 Third-Party Requests for Services

(a) When a Howard Center employee agrees to provide services to a person or entity at the request of a third party, the employee will clarify to the extent feasible, at the outset of the service, the nature of the relationship with each party. This clarification will include the role of the employee (such as therapist, organizational consultant, diagnostician, or expert witness), the probable uses of the services provided or the information obtained, and the fact that there may be limits to confidentiality.

(b) If there is a foreseeable risk of Howard Center employee's being called upon to perform conflicting roles because of the involvement of a third party, the employee will clarify the nature and direction of his or her responsibilities, keep all parties appropriately informed as matters develop, and resolve the situation in accordance with this Ethics Code.

2.09 Delegation to and Supervision of Subordinates

(a) Howard Center employees will delegate to their fellow employees and supervisees only those responsibilities that such persons can reasonably be expected to perform competently, on the basis of their education, training, or experience, either independently or with the level of supervision being provided.

(b) Howard Center employees will provide training and/or supervision to their fellow employees or supervisees and take reasonable steps to see that such persons perform services responsibly, competently, and ethically.

(c) If institutional procedures, or practices prevent fulfillment of this obligation, Howard Center employees will attempt to modify their role or to correct the situation to the extent feasible.

2.10 Design of Education and Training Programs

Howard Center employees who are responsible for education and training programs will seek to ensure that the programs are competently designed, provide the proper experiences, and meet the requirements for licensure, certification, or other goals for which claims are made by the program.

2.11 Descriptions of Education and Training Programs

(a) Howard Center employees responsible for education and training programs will seek to ensure that there is a current and accurate description of the program content, training goals and objectives, and requirements that must be met for satisfactory completion of the program. This information will be made readily available to all interested parties.

(b) Howard Center employees will seek to ensure that statements concerning their course outlines are accurate and not misleading, particularly regarding the subject matter to be covered, bases for evaluating progress, and the nature of course experiences.

(c) To the degree to which they exercise control, Howard Center employees responsible for announcements, catalogs, brochures, or advertisements describing workshops, seminars, or other non-degree-granting educational programs will ensure that they accurately describe the audience for which the program is intended, the content, the presenters, and the fees involved.

2.12 Assessing Student and Supervisee Performance

(a) In academic and supervisory relationships, Howard Center employees will establish an appropriate process for providing feedback to students and supervisees.

(b) Howard Center employees will evaluate students and supervisees on the basis of their actual performance on relevant and established program requirements.

2.13 Documentation of Professional Work

(a) Howard Center employees will appropriately document their professional work in order to facilitate provision of services later by them or by other professionals, to ensure accountability, and to meet other requirements of professional standards or the law.

2.14 Records and Data

Howard Center employees will create, maintain, disseminate, store, retain, and dispose of records and data relating to their practice, and other work in accordance with law and in a manner that permits compliance with the requirements of this Ethics Code.

2.15 Familiarity with Ethics Code and Agency Policy

Howard Center employees have an obligation to be familiar with this Ethics Code, other applicable ethics codes, and their application to Howard Center employees' work. Lack of awareness or misunderstanding of an ethical standard is not itself a defense to a charge of unethical conduct. Likewise, it is incumbent upon Howard Center employees to be familiar with agency policies, particularly as they pertain to client care and contact.

2.16 Confronting Ethical Issues

When a Howard Center employee is uncertain whether a particular situation or course of action violates this Ethics Code, Howard Center employee will consult with his/her Howard Center supervisor. If the situation involves the supervisor, consultation will be sought with the supervisor's supervisor.

2.17 Conflicts Between Ethics and Organizational Demands

If the demands of an organization with which Howard Center employees are affiliated conflict with this Ethics Code, Howard Center employees will clarify with their supervisor the nature of the conflict, make known their commitment to the Ethics

Code, and to the extent feasible, will seek to resolve the conflict in a way that permits the fullest adherence to the Ethics Code.

2.18 Cooperating With Ethics Committees

Howard Center employees will cooperate in ethics investigations, proceedings, and resulting requirements of any affiliated state licensing or certification association to which they belong. In doing so, they must continue to adhere to confidentiality regulations. Failure to cooperate is itself an ethics violation.

2.19 Improper Complaints

Howard Center employees will not file or encourage the filing of ethics complaints that are frivolous and are intended to harm the respondent rather than to protect the public.

Principle 03. - Non-Discrimination

Howard Center employees will not engage in, condone, or facilitate unfair discrimination based on age, gender, race, ethnicity, national origin, religion, sexual orientation, disability, language, socioeconomic status, or any basis proscribed by law.

(a) Through an awareness of stereotyping and discrimination, Howard Center employees will guard the individual rights and dignity of clients and co-workers.

(b) In accordance with law, Howard Center employees shall make reasonable accommodations for persons with disabilities to allow for participation as a client, staff person, Board member, visitor, or community member.

Principle 04. - Confidentiality

4.01 Discussing the Limits of Confidentiality

(a) Howard Center employees will discuss with persons and organizations with whom they establish a professional relationship (including, to the extent feasible, minors and their legal representatives) (1) the relevant protections and limitations on confidentiality, including limitations where applicable in group, marital, and family therapy or in organizational consulting, and (2) the foreseeable uses of the information generated through their services.

(b) Unless it is not feasible or is contraindicated, the discussion of confidentiality will occur at the outset of the relationship and thereafter as new circumstances may warrant.

(c) Permission for electronic recording of interviews will be secured from clients and patients.

4.02 Maintaining Confidentiality

Howard Center employees have a primary obligation and take precautions to respect the confidentiality rights of those with whom they work or consult, recognizing that confidentiality may be established by law, institutional rules, or professional

relationships. Howard Center employees will treat as confidential information pertaining to the organization which is defined as such.

4.03 Minimizing Intrusions on Privacy

(a) In order to minimize intrusions on privacy, Howard Center employees will include in written and oral reports, consultations, and the like, only information germane to the purpose for which the communication is made.

(b) Howard Center employees will discuss confidential information obtained in clinical or consulting relationships, or evaluative data concerning patients, individual or organizational clients, students, research participants, supervisees, and employees only for appropriate professional purposes and only with persons clearly concerned with such matters.

(c) Every effort will be made to protect information about third parties obtained in the course of provision of services.

4.04 Maintenance of Records

Howard Center employees will maintain appropriate confidentiality in creating, storing, accessing, transferring, and disposing of records under their control, whether these are written, automated, or in any other medium. Howard Center employees will maintain and dispose of records in accordance with law and in a manner that permits compliance with the requirements of this Ethics Code.

4.05 Disclosures

(a) Howard Center employees will disclose confidential information without the consent of the individual only as mandated by law, or where permitted by law for a valid and professionally acceptable purpose.

(b) Howard Center employees also may disclose confidential information with the appropriate consent of the patient or the individual or organizational client (or of another legally authorized person on behalf of the patient or client), unless prohibited by law or by appropriate professional considerations.

4.06 Consultations

When consulting with colleagues, (a) Howard Center employees will not share any information that reasonably could lead to the identification of a patient, client, research participant, or other person or organization with whom they have a confidential relationship unless they have obtained the prior consent of the person or organization and (b) they share information only to the extent necessary to achieve the purposes of the consultation.

4.07 Use of Confidential Information for Didactic or Other Purposes

Howard Center employees will not disclose in their writings, lectures, or other public media confidential, personally identifiable information concerning their patients, individual or organizational clients, students, research participants, or other recipients of their services that they obtained during the course of their work, unless the person or organization has consented in writing or unless there is legal authorization for doing so.

4.08 Ownership of Records and Data

Recognizing that ownership of records and data is governed by legal principles, Howard Center employees will take reasonable and lawful steps so that records and data remain available to the extent needed to serve the best interests of patients, individual or organizational clients, research participants, or appropriate others.

4.09 Mutual Help Meetings

Many of us were drawn to the fields of mental health, substance abuse and developmental services due to our personal experiences, either our own or those of our family members or friends. When providing services in the community where you both work and live, it is inevitable that you will cross paths with clients in many places and situations. For staff members in recovery using mutual help meetings such as Alcoholics Anonymous, it is unavoidable that clients may attend the same meeting. These dual relationships are potentially harmful for both parties.

Some of the issues:

- Ø Your anonymity may be lost if a client reveals s/he is receiving services from you.
- Ø A disclosure by you may be risky as it may negatively impact your professional relationship with the client.
- Ø Comments by you may undermine the client's confidence in you and/or the agency.
- Ø A client may believe that you have a great deal of power over them and not share information during a meeting.

Steps you can consider taking:

- Ø Be aware of the influential position you have with clients.
- Ø If possible switch to a different self-help group where there are no clients in attendance (the agency is supportive of your recovery efforts and is not suggesting that self-help meetings be avoided as it may negatively impact your recovery).
- Ø At all times, protect the confidentiality of clients when discussing work related stresses that are challenging your recovery.
- Ø Do not sponsor a current or former client.
- Ø Be aware of the "meeting after the meeting" when group members have ongoing conversations over coffee and refreshments.

Principle 05. - Competence

5.01 Human Differences

Where differences of age, gender, race, ethnicity, national origin, religion, sexual orientation, disability, language, or socioeconomic status significantly affect the work of Howard Center employees concerning particular individuals or groups, Howard Center employees are encouraged to obtain the training, experience, consultation, or supervision necessary to ensure the competence of their services, or they make appropriate referrals.

5.02 Boundaries of Competence

(a) Howard Center employees will provide services only within the boundaries of their competence, based on their education, training, supervised experience, licensure/certification, or appropriate professional experience.

(b) Howard Center employees will provide services in new areas or involving new techniques only after first undertaking appropriate study, training, supervision, and/or consultation from persons who are competent in those areas or techniques.

(c) In those emerging areas in which generally recognized standards for preparatory training do not yet exist, Howard Center employees will nevertheless take reasonable steps to ensure the competence of their work.

5.03 Maintaining Expertise

Howard Center employees who engage in support services, assessment, therapy, teaching, research, organizational consulting or other professional activities will maintain a reasonable level of awareness of current scientific and professional information in their fields of activity, and will undertake ongoing efforts to maintain competence in the skills they use.

Principle 06. - Legal and Moral Standards

Howard Center employees shall uphold the legal and accepted moral codes that pertain to professional conduct.

(a) Howard Center employees shall be fully knowledgeable about state and federal laws that relate to the delivery of the services they provide.

(b) Howard Center employees' behavior off the job will be conducted in a manner that does not negatively impact their ability to do their jobs, or threatens the credibility of the agency.

Principle 07. - Inter-professional Relationships

7.01 Providing Mental Health Services to Those Served by Others

In deciding whether to offer or provide services to those already receiving mental health services elsewhere, Howard Center employees will carefully consider the treatment issues and the potential client's welfare. Howard Center employees will discuss these issues with the patient or client, or another legally authorized person on behalf of the client, in order to minimize the risk of confusion and conflict, will consult with the other service providers when appropriate, and will proceed with caution and sensitivity to the therapeutic issues.

7.02 Consultations and Referrals

(a) Howard Center employees will arrange for appropriate consultations and referrals based principally on the best interests of their patients or clients, with appropriate consent, and subject to other relevant considerations, including applicable law and contractual obligations.

(b) When indicated and professionally appropriate, Howard Center employees will cooperate with other professionals in order to serve their patients or clients effectively and appropriately.

Principle 08. - Remuneration

8.01 Barter (With Patients or Clients)

Howard Center employees will refrain from accepting goods, services, or other non-monetary remuneration from patients or clients in return for official services because such arrangements create inherent potential for conflicts, exploitation, and distortion of the professional relationship.

8.02 Fees and Financial Arrangements

(a) As early as is feasible in a professional relationship, Howard Center employee and the patient, client, or other appropriate recipient of services will reach an agreement specifying the compensation and the billing arrangements.

(b) Howard Center employees will not exploit recipients of services or payers with respect to fees.

(c) Howard Center employees will not misrepresent the agency's fees.

(d) If limitations to services can be anticipated because of limitations in financing, this will be discussed with the patient, client, or other appropriate recipient of services as early as is feasible.

8.03 Fee Splitting

Howard Center will not engage in fee splitting.

8.04 Accuracy in Reports to Payers and Funding Sources

In their reports to payers for services or sources of other funding, Howard Center employees will accurately state the nature of the research or service provided, the fees or charges, and where applicable, the identity of the provider, the findings, and the diagnosis.

Principle 09. - Testing and Research

9.01 Evaluation, Diagnosis, and Interventions in Professional Context

(a) Howard Center employees will perform evaluations, diagnostic services, or interventions only within the context of a defined professional relationship.

(b) Howard Center employees will refrain from misuse of assessments, recommendations, reports, and psychological diagnostic or evaluative statements.

9.02 Competence and Appropriate Use of Assessments and Interventions

(a) Howard Center employees who develop, administer, score, interpret, or use psychological assessment techniques, interviews, tests, or instruments will do so in a manner and for purposes that are appropriate in light of the research on or evidence of the usefulness and proper application of the techniques.

(b) Howard Center will release raw test results or raw data to clients or their legal guardian only upon specific request for those results. Howard Center will release raw test results or raw data to other parties only upon request of the patient or their legal guardian and with a valid authorization.

9.03 Use of Assessment in General and With Special Populations

(a) Howard Center employees who perform interventions or administer, score, interpret, or use assessment techniques will be familiar with the reliability, validation, and related standardization's or outcome studies of, and proper applications and uses of, the techniques they use.

(b) Howard Center employees will recognize limits to the certainty with which diagnoses, judgments, or predictions can be made about individuals.

(c) Howard Center employees will attempt to identify situations in which particular intervention or assessment techniques or norms may not be applicable or may require adjustment in administration or interpretation because of factors such as individuals' gender, age, race, ethnicity, national origin, religion, sexual orientation, disability, language, or socioeconomic status and will document such adjustments.

9.04 Interpreting Assessment Results

When interpreting assessment results, including automated interpretations, Howard Center employees take into account the various test factors and characteristics of the person being assessed that might affect judgments or reduce the accuracy of their interpretations. They indicate any significant reservations they have about the accuracy or limitations of their interpretations.

9.05 Human Subjects Research

Any human subjects research conducted by the agency shall follow the protocol outlined in the agency's policy on this subject.

Principle 10. - Public Statements

10.01 Avoidance of False or Deceptive Statements

Howard Center employees will not make public statements that are false, deceptive, misleading, or fraudulent, either because of what they state, convey, or suggest or because of what they omit, concerning their research, practice, or other work activities or those of persons or organizations with which they are affiliated. As examples (and not in limitation) of this standard, Howard Center employees will not make false or deceptive statements concerning (1) their training, experience, or competence; (2) their academic degrees- (3) their credentials; (4) their institutional or

association affiliations; (5) their services; (6) the scientific or clinical basis for, or results or degree of success of, their services; (7) their fees; or (8) their publications or research findings.

10.02 Media Presentations

When Howard Center employees provide advice or comment by means of public lectures, demonstrations, radio or television programs, prerecorded tapes, printed articles, mailed material, or other media, they will take reasonable precautions to ensure that (1) the statements are based on appropriate psychological literature and practice, (2) the statements are otherwise consistent with this Ethics Code, (3) the information accurately represents the intent or position of Howard Center and (4) the recipients of the information are not encouraged to infer that a relationship has been established with them personally.

10.03 Testimonials

Howard Center employees will not solicit testimonials from current psychotherapy clients or patients or other persons who because of their particular circumstances are vulnerable to undue influence.

Principle 11. - Publication Credit

Howard Center staff shall not violate copyright laws. Howard Center employees will cite the source of any material used for publication or educational purposes, internally or externally. Staff shall acknowledge authorship in footnotes or introductory statements. Information provided in an educational setting which is based on work other than the presenters will be attributed to its source.

Principle 12. - Business and Marketing Practices

Howard Center' business, marketing, clinical, and employment practices are conducted in a manner that is fair and avoids conflicts of interest or the appearance of such conflict. Situations in which undue influence is brought to bear by a person of authority over one with less authority, to the personal benefit of the former, is prohibited. Similarly prohibited are decisions or actions that benefit an individual instead of the agency or a client of the agency.

12.01 Bidding

When bidding is deemed to be an appropriate method for making purchasing decisions, bids for goods or services are reviewed fairly and awarded to the bidder whose offer best serves the interests of the organization.

12.02 Use of Howard Center Information

All information possessed or collected by Howard Center or its staff by manual, electronic or other means, including but not limited to all client, business, utilization, and personnel data is proprietary. With the exception of clients' own Protected Health Information in accordance with the Health Information Portability and Accountability Act,

the information is the sole property of the agency. Any use of proprietary information other than that allowed for under HIPAA and 42 CFR Part 2, must be authorized by a supervisor and be consistent with these policies.

12.03 Gifts, Gratuities, Bonuses, Honoraria and Incentives

Any gift, gratuity, bonus, honorarium, incentive, or in-kind perquisite, including indirect expenses paid on behalf of a staff with a value of \$25.00 or more, given or lent to a staff person in the course of, or related to their work as a Howard employee, will be the sole property of the agency. Any of the aforementioned inducements, be they for services to be performed or purchases of property will be disclosed to the staff person's supervisor and provided to the agency. In addition, acceptance by the agency of any inducement shall not affect business or clinical practice as a result. No quid pro quo shall occur.

12.04 Conflict of Interest

It is a policy of the Agency to prohibit employees from engaging in any activity, practice or conduct which conflicts with, or appears to conflict with, in the sole judgment of the Agency, the interests of the Agency or its clients. Any conflict or potential conflict must be disclosed to the employee's immediate supervisor and Service Area Director. (See section 226 of the Personnel Policies).

In the event that a member or officer of the Board of Trustees, or senior staff member has a personal, financial, business, or any other direct interest in or relationship with any individual, organization, association, or corporation, which proposes to or is being considered to enter into any transaction with Howard Center, or any of its service areas or programs, such person or persons shall declare said interest to the Board of Trustees or committee. Such disclosure shall be noted in the minutes. (See Policy Regarding Conflict of Interest in the Howard Center manual.)

12.05 Outside Employment

Staff of Howard Center will not engage in outside employment that competes with services provided by the Agency unless conditions outlined in the Howard Center personnel policies are met. (See section 215 of the Howard Center Personnel Policies.)

Principle 13. - Societal Obligation

Employees of Howard Center shall, through their endeavors and community affiliations, advance the understanding of the nature of mental illness, developmental disabilities and substance abuse. They will strive for the de-stigmatization of these conditions, and for the amelioration of human suffering. They will work to the best of their abilities to contribute to the welfare of the community as a whole, and to promoting the dignity, self-determination, and worth of the people they serve.

Principle 14. – Employee Fundraising

Solicitations of any kind must be authorized by Senior Management and must be in keeping with the Agency's mission and values. Staff who are seeking to raise funds for non-profit activities may not individually solicit clients or co-workers for support. With prior authorization of Senior Management, staff may be permitted to place a brochure with instructions as to how to support this activity in a public space such as a staff break area. Questions regarding this policy may be directed to Service Area Directors or the Director of Operations.

Principle 15. – Personal Property

Client Property – Howard Center clients are responsible for their own property. If Howard Center should take possession of client property for any reason, a receipt for the property will be issued to the client. An agreement will be made as to how and when that property will be returned.

Staff Property - Howard Center staff are discouraged from bringing personal property onto the premises of agency operations. If staff should bring their personal property onto the premises, they assume responsibility for its safekeeping. Howard Center does not accept liability for any damage or loss that should occur.