



Ethical Practice

INTRODUCTION

COA's Ethical Practice standards are based on the assumption that good resource management drives excellence in agency performance and service delivery, and that good resource management cannot occur in an environment that lacks expectations for ethical practice.

The current discussion of ethical practice in business and legal literature, and best practice codes of corporate governance, parallels the current discussion about ethical practice in the nonprofit community. While debate continues about the feasibility of substituting federal and state regulations for strong voluntary support of non-profit ethical practice standards to prevent improper conduct, the risk of harm to an agency's reputation due to negative publicity remains a strong, practical deterrent to unethical practice. A practical, proactive stance to garnering the public trust goes beyond thinking about compliance with legal standards.

COA's standards assume the most effective approach to preventing improper conduct lies in a combination of factors rather than isolated policies and procedures. Research suggests that an organizational culture with a clear preference for trustworthiness in employees, public reactions and demands for accountability, and compliance with legal requirements, altogether, will work to encourage ethical practices.

Note: *COA's Standards for Public Agencies have been updated in order to correspond with the work of state-administered agencies. Please see the tip sheet [How to Read the Standards and Tables of Evidence - Public](#) for further information on interpreting requirements according to public agency structure.*

Note: *Please see [PA-ETH Reference List](#) for a list of resources that informed the development of these standards.*

Table of Evidence

Self-Study Evidence

County/Municipality Administered Agency, State Administered Agency (Central Office), or other Public Entity

- Describe activities that create an open and transparent system of accountability in the agency (e.g., 1. Our agency has adopted the basic principles of the Sarbanes-Oxley... 2. Following our annual risk prevention and management review, our conflict of interest policies were revised in response to...).
- a. Provide specific examples of how the agency provides access to information about programs, services, and finances to agency

Purpose

The agency earns and sustains the public trust through honest, truthful, and responsible transactions, partnerships, and relationships with individuals, communities, providers, businesses, donors, and government entities.



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stakeholders and the public.

- b. Describe the agency's efforts to eliminate internal and external barriers to achieving accountability.
- Cite two examples of activities or decisions that the agency has made that demonstrate implementation of its conflict of interest policy (e.g., 1. A member of the agency's community advisory board stood to make a profit on the leasing of her property to the state. She removed herself from the discussion about the leasing agreement... 2. Clinical staff must sign waiver of clearance with private practice clients...).
- Describe how the agency protects against employment-related retaliation for those who come forth with information about questionable practices and suspected misconduct.
- Provide any additional information that would increase the Peer Team's understanding of how the agency's ethical practice(s) sustains the public trust of the agency, and impacts its viability and sustainability. State Administered Agency (Regional Office)
- Describe regional activities that create an open and transparent system of accountability (e.g. activities that demonstrate implementation of the conflict of interest policy or efforts to increase public trust in the region)
- Provide any additional information that would increase the Peer Team's understanding of how the agency's ethical practice(s) sustains the public trust of the agency, and impacts its viability and sustainability.

On-Site Evidence

No On-Site Evidence

On-Site Activities

No On-Site Activities

Purpose

The agency earns and sustains the public trust through honest, truthful, and responsible transactions, partnerships, and relationships with individuals, communities, providers, businesses, donors, and government entities.



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PA-ETH 1: Open, Transparent Operations

The agency operates in an open and transparent manner in accordance with applicable legal requirements and uses assets exclusively and effectively to serve the purpose for which it has been created.

Rating Indicators

1) Full Implementation, Outstanding Performance

A rating of (1) indicates that the agency's practices fully meet the standard and reflect a high level of capacity.

- All elements or requirements outlined in the standard are evident in practice, with rare or no exceptions; exceptions do not impact service quality or agency performance.

2) Substantial Implementation, Good Performance

A rating of (2) indicates that an agency's infrastructure and practices are basically sound but there is room for improvement.

- The majority of the standards requirements have been met and the basic framework required by the standard has been implemented.
- Minor inconsistencies and not yet fully developed practices are noted; however, these do not significantly impact service quality or agency performance.

3) Partial Implementation, Concerning Performance

- A rating of (3) indicates that the agency's observed infrastructure and/or practices require significant improvement.
- The agency has not implemented the basic framework of the standard but instead has in place only part of this framework.
- Omissions or exceptions to the practices outlined in the standard occur regularly, or practices are implemented in a cursory or haphazard manner.
- Service quality or agency functioning may be compromised.
- Capacity is at a basic level.

4) Unsatisfactory Implementation or Performance

- A rating of (4) indicates that implementation of the standard is minimal or there is no evidence of implementation at all.
- The agency's observed administration and management infrastructure and practices are weak or non-existent; or show signs of neglect, stagnation, or deterioration.
Please see [Rating Guidance](#) for additional rating examples.

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The agency earns and sustains the public trust through honest, truthful, and responsible transactions, partnerships, and relationships with individuals, communities, providers, businesses, donors, and government entities.



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Table of Evidence

Self-Study Evidence

County/Municipality Administered Agency, State Administered Agency (Central Office), or other Public Entity

- See narrative evidence
- Review of Network website
- Review of Network written materials State Administered Agency (Regional Office)
- See narrative evidence

On-Site Evidence

State Administered Agency (Regional Office)

- Agency mission/vision statement
- Financial reports/audits

On-Site Activities

County/Municipality Administered Agency, State Administered Agency (Central Office), or other Public Entity

- Interview:
 - a. Agency head
 - b. Oversight Entity/Stakeholder Advisory Panel members
 - c. CFO or equivalent
 - d. Persons served/community stakeholders
 - e. Personnel State Administered Agency (Regional Office)
- Interview:
 - a. Agency leadership
 - b. Persons served/community stakeholders
 - c. Personnel

PA-ETH 1.01

The public has access to clear, timely, accurate information about the agency's programs, activities, service recipients, and finances.

Interpretation: *Consumers of services, donors, volunteers, and public officials are among those for whom access to information should be assured.*

PA-ETH 1.02

The agency accurately portrays its mission in all communications that contain such a representation.

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PA-ETH 1.03

The agency eliminates internal and external barriers to achieving accountability throughout the agency, including unawareness of expectations and current information.

Related: PA-ETH 2.04

PA-ETH 1.04

When the network management entity, organizations with an ownership interest in the network, or members of the network's board of directors provide direct services to network clients, the network management entity discloses all ownership, partnership, or governance arrangements in all written material describing the network.

Related: PA-ETH 2.04

Interpretation: *In partner networks, which typically consist of a group of agencies that have joined together to form a new, separately incorporated network entity, the partner agencies often have a direct financial stake in the network, as well as a direct role in the network's governance, decision-making, and outcomes. In such cases partner agencies can be considered the network's "owners."*

A network can use a simple statement such as "The XYZ Network is a partnership of provider agencies in Clark County" on letterhead or other written material, as long as the network makes more detailed written information, such as a list of all "owners" available upon request.

NA *The agency is not a network management entity.*

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(FOC) PA-ETH 2: Conflict of Interest

The agency prevents the enrichment of insiders and other abuses through the adoption and enforcement of a conflict of interest policy consistent with state laws and regulations.

Related: PA-HR 5.02

Interpretation: *COA does not define "conflict of interest," and expects an agency's policy to do so.*

The Panel on the Nonprofit Sector, Interim Report, Section 4, Conflict of Interest Policy Disclosure contains a useful description of the Conflict of Interest issue. References to the Internal Revenue Code note that the Code defines a conflict of interest and that: "All states mandate that directors and officers owe a duty of loyalty to the organization, and improperly benefiting from a transaction involving a conflict of interest more than likely involves a violation of the duty of loyalty. Some state statutes specifically penalize participation in transactions involving conflicts of interests unless the organization follows certain prescribed procedures."

Note: *Please see [Conflict of Interest Policy and Procedure Template - Private, Public, Canadian, Network](#) for additional assistance with this standard.*

Rating Indicators

1) Full Implementation, Outstanding Performance

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The agency earns and sustains the public trust through honest, truthful, and responsible transactions, partnerships, and relationships with individuals, communities, providers, businesses, donors, and government entities.



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practices require significant improvement.Â Â

- The agency has not implemented the basic framework of the standard but instead has in place only part of this framework.Â Â
- Omissions or exceptions to the practices outlined in the standard occur regularly, or practices are implemented in a cursory or haphazard manner.Â Â
- Service quality or agency functioning may be compromised.Â Â
- Capacity is at a basic level.

4) Unsatisfactory Implementation or Performance

- A rating of (4) indicates that implementation of the standard is minimal or there is no evidence of implementation at all.Â Â
- The agency's observed administration and management infrastructure and practices are weak or non-existent; or show signs of neglect, stagnation, or deterioration.
Please see [Rating Guidance](#) for additional rating examples.Â Â

Table of Evidence

Self-Study Evidence

County/Municipality Administered Agency, State Administered Agency (Central Office), or other Public Entity

- Conflict of interest policy and procedures
 - Network Management Manual
 - Network utilization data to review referral and utilization patterns
- ##### State Administered Agency (Regional Office)
- Documentation of policy communication to staff

On-Site Evidence

County/Municipality Administered Agency, State Administered Agency (Central Office), or other Public Entity

- Management meeting minutes documenting discussions of potential and apparent conflicts of interest
 - Financial statements/audits
 - Network client files to review reasons for referrals to particular providers
- ##### State Administered Agency (Regional Office)
- No On-site Evidence

On-Site Activities

County/Municipality Administered Agency, State Administered Agency (Central Office), or other Public Entity

- Interview:
 - a. Agency head
 - b. Ethics officer/in-house counsel
 - c. Oversight Entity/Stakeholder Advisory Panel members

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The agency earns and sustains the public trust through honest, truthful, and responsible transactions, partnerships, and relationships with individuals, communities, providers, businesses, donors, and government entities.



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- d. CFO or equivalent
- e. Persons served/community stakeholders
- f. Personnel
- Network interview:
 - a. Network Advisory Body
 - b. Directors of agencies that contract with the managing entity
 - c. Network personnel involved in assessments and referral State Administered Agency (Regional Office)
- Interview:
 - a. Agency leadership
 - b. Persons served/community stakeholders
 - c. Personnel

PA-ETH 2.01

A conflict of interest policy is tailored to the agency's specific needs and characteristics, and:

- a. defines conflict of interest;
- b. identifies groups of individuals within the organization covered by the policy;
- c. addresses transactions between oversight entities and the agency;
- d. addresses policy enforcement;
- e. provides a framework for evaluating situations that may constitute a conflict; and
- f. invests management with developing procedures that facilitate disclosure of information to prevent and manage potential and apparent conflicts of interest.

Related: PA-ETH 5, PA-CFS 23.01

Interpretation: *If an agency has a conflict of interest policy requiring signature of the designated authority, these signed forms should be available with the policy. The conflict of interest policy should ensure, among other things, that advisory members recuse themselves on matters where their objectivity could be compromised.*

PA-ETH 2.02

Conflict of interest policies and procedures ensure that contracts and business arrangements serve the agency's and service recipients' best interests, not private interests.

Related: PA-PQI 8

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PA-ETH 2.03

Advisory group members, personnel, and consultants who in any way have a financial interest in the agency's assets, business transactions, leases, or professional services:

- a. disclose this information; and
- b. do not participate in any discussion or vote taken with respect to such interests.

PA-ETH 2.04

The network has a process for ensuring that its activities are carried out in an even-handed, principled manner and in the interests of service recipients.

Related: PA-ETH 1.03, PA-ETH 1.04, PA-ETH 5.02

Interpretation: *It is essential that the network guard against any real or perceived conflict of interest in the manner in which it conducts its business, especially with regard to assessment, referral, and utilization management practices.*

NA *The agency is not a network management entity.*

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The agency earns and sustains the public trust through honest, truthful, and responsible transactions, partnerships, and relationships with individuals, communities, providers, businesses, donors, and government entities.



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PA-ETH 3: Fundraising

An agency that raises funds by individual solicitation from the general public conducts fundraising activities in an ethical, fiscally responsible manner.

Interpretation: *This section is applicable to agencies that conduct fundraising through solicitation or receipt of money from private individuals, typically through means such as capital campaigns and contribution plans. This section is not applicable to agencies that apply for and/or receive private or public grants and contracts.*

The agency reconciles its fundraising practices with prevailing ethical practices of the Association of Fundraising Professionals or similar national bodies.

NA *The agency does not raise funds through solicitations or general fundraising events.*

NA *State Administered Agency Regional Office*

Rating Indicators

1) Full Implementation, Outstanding Performance

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- All elements or requirements outlined in the standard are evident in practice, with rare or no exceptions; exceptions do not impact service quality or agency performance.

2) Substantial Implementation, Good Performance

A rating of (2) indicates that an agency's infrastructure and practices are basically sound but there is room for improvement.

- The majority of the standards requirements have been met and the basic framework required by the standard has been implemented.
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3) Partial Implementation, Concerning Performance

- A rating of (3) indicates that the agency's observed infrastructure and/or practices require significant improvement.
- The agency has not implemented the basic framework of the standard but instead has in place only part of this framework.
- Omissions or exceptions to the practices outlined in the standard occur

Purpose

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regularly, or practices are implemented in a cursory or haphazard manner.Â Â

- Service quality or agency functioning may be compromised.Â Â
- Capacity is at a basic level.

4) Unsatisfactory Implementation or Performance

- A rating of (4) indicates that implementation of the standard is minimal or there is no evidence of implementation at all.Â Â
- The agency's observed administration and management infrastructure and practices are weak or non-existent; or show signs of neglect, stagnation, or deterioration.
Please see [Rating Guidance](#) for additional rating examples.Â

Table of Evidence

Self-Study Evidence

County/Municipality Administered Agency, State Administered Agency (Central Office), or other Public Entity

- Policies and procedures for all fundraising practices; including confidentiality of donors
- Sample fundraising contract template**State Administered Agency (Regional Office)**
- Evaluated at the Central Office only

On-Site Evidence

County/Municipality Administered Agency, State Administered Agency (Central Office), or other Public Entity

- Contracts/agreements
- Financial statements/reports
- Analysis of costs and benefits for sample of fundraising activities
- Management meeting minutes**State Administered Agency (Regional Office)**
- Evaluated at the Central Office only

On-Site Activities

County/Municipality Administered Agency, State Administered Agency (Central Office), or other Public Entity

- Interview:
 - a. Agency head
 - b. CFO or equivalent
 - c. Development director **State Administered Agency (Regional Office)**
- Evaluated at the Central Office only

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The agency earns and sustains the public trust through honest, truthful, and responsible transactions, partnerships, and relationships with individuals, communities, providers, businesses, donors, and government entities.



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PA-ETH 3.01

The agency's management oversees fundraising activities and establishes written agreements with outside contractors or consultants.

PA-ETH 3.02

The agency:

- a. accurately describes the purpose for which solicitations are being made;
- b. spends funds for the purposes they were solicited, with the exception of reasonable costs for administration of the fundraising program;
- c. maintains accounting segregation for restricted funds; and
- d. respects donor confidentiality requests.

Interpretation: *Conducting solicitations in an ethical manner also requires the agency to ensure that there are no material omissions, misstatements of fact, or misrepresentations regarding the use of funds.*

Interpretation: *Internal controls should address the handling and acknowledgement of contributions and respect for donor confidentiality requests. At a minimum, the agency should protect the confidentiality of donors who request anonymity by ensuring that such donors' names are not published or listed in newsletters, articles, annual reports, or other publicly available documents regarding the agency.*

PA-ETH 3.03

Costs and benefits of each fundraising activity are analyzed, taking into account factors that affect the reasonableness of fundraising costs in comparison to dollars raised.

Interpretation: *Factors that affect reasonableness of fundraising costs to dollars raised include, and are not limited to: the differential costs of donor solicitation, donor renewal, large bequests, or donations that would obscure true fundraising costs. The agency must show that it carefully allocates fundraising costs and does not obscure them by allocation to program or educational purposes. The agency must collect and maintain data that support sound fund development decisions by its leadership.*

PA-ETH 3.04

Upon request of a donor or funding source, the agency discloses descriptive

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and financial information for revenue-generating activities including fee-for-service programs, for-profit subsidiaries, and related or unrelated business ventures.

PA-ETH 3.05

The agency raises funds in accordance with applicable local, state, and federal requirements and registers all fundraising activities with the appropriate administrative authorities

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(FOC) PA-ETH 4: Protection of Reporters of Suspected Misconduct

The agency prohibits employment-related retaliation against employees and others affiliated with the agency who come forward with information about suspected misconduct or questionable practices, and provides an appropriate, confidential channel for reporting such information.

Related: PA-HR 5.02

Interpretation: *An agency establishing a policy to protect reporters of suspected misconduct can begin by adopting a code of conduct and ethical practice and developing reporting procedures. Procedures should include avoidance of baseless allegations, maintenance of anonymity, definitions, rights and responsibilities, and the role of supervisors, senior management, and governing body officers or committees.*

Note: *Please see the Whistleblower Policy Template - Private, Public, Canadian, Network for additional assistance with this standard.*

Rating Indicators

1) Full Implementation, Outstanding Performance

A rating of (1) indicates that the agency's practices fully meet the standard and reflect a high level of capacity.

- All elements or requirements outlined in the standard are evident in practice, with rare or no exceptions; exceptions do not impact service quality or agency performance.

2) Substantial Implementation, Good Performance

A rating of (2) indicates that an agency's infrastructure and practices are basically sound but there is room for improvement.

- The majority of the standards requirements have been met and the basic framework required by the standard has been implemented.
- Minor inconsistencies and not yet fully developed practices are noted; however, these do not significantly impact service quality or agency performance.

3) Partial Implementation, Concerning Performance

- A rating of (3) indicates that the agency's observed infrastructure and/or practices require significant improvement.
- The agency has not implemented the basic framework of the standard but instead has in place only part of this framework.
- Omissions or exceptions to the practices outlined in the standard occur

Purpose

The agency earns and sustains the public trust through honest, truthful, and responsible transactions, partnerships, and relationships with individuals, communities, providers, businesses, donors, and government entities.



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regularly, or practices are implemented in a cursory or haphazard manner.Â Â

- Service quality or agency functioning may be compromised.Â Â
- Capacity is at a basic level.

4) Unsatisfactory Implementation or Performance

- A rating of (4) indicates that implementation of the standard is minimal or there is no evidence of implementation at all.Â Â
- The agency's observed administration and management infrastructure and practices are weak or non-existent; or show signs of neglect, stagnation, or deterioration.
Please see [Rating Guidance](#) for additional rating examples.Â

Table of Evidence

Self-Study Evidence

County/Municipality Administered Agency, State Administered Agency (Central Office), or other Public Entity

- EEOC policy
- Grievance policy and procedures
- Whistle-blower provisions in legislation or administrative code
- Documentation of any grievances/incidents related to retaliation

State Administered Agency (Regional Office)

- Documentation of policy communication to staff (e.g. memos, staff meeting minutes, training documents)
- Documentation of any regional grievances/incidents related to retaliation

On-Site Evidence

All Agencies

- Personnel Manual (printed or online)

On-Site Activities

County/Municipality Administered Agency, State Administered Agency (Central Office), or other Public Entity

- Interview:
 - a. Agency head
 - b. Ethics officer/in-house counsel
 - c. Personnel
 - d. HR director
 - e. Persons served/community stakeholders

State Administered Agency (Regional Office)

- Interview:
 - a. Agency leadership
 - b. Personnel

Purpose

The agency earns and sustains the public trust through honest, truthful, and responsible transactions, partnerships, and relationships with individuals, communities, providers, businesses, donors, and government entities.



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- c. HR staff
- d. Persons served/community stakeholders

Purpose

The agency earns and sustains the public trust through honest, truthful, and responsible transactions, partnerships, and relationships with individuals, communities, providers, businesses, donors, and government entities.



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(FOC) PA-ETH 5: Professional Conduct

The agency conducts business and delivers services in an honest, ethical, objective manner and is guided in making decisions by professional responsibility as opposed to personal interests.

Related: PA-ETH 2.01, PA-HR 5.02

Note: Please see [Conflict of Interest Policy and Procedure Template - Private, Public, Canadian, Network](#) for additional assistance with this standard.

Rating Indicators

1) Full Implementation, Outstanding Performance

A rating of (1) indicates that the agency's practices fully meet the standard and reflect a high level of capacity.

- All elements or requirements outlined in the standard are evident in practice, with rare or no exceptions; exceptions do not impact service quality or agency performance.

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- The majority of the standards requirements have been met and the basic framework required by the standard has been implemented.
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The agency earns and sustains the public trust through honest, truthful, and responsible transactions, partnerships, and relationships with individuals, communities, providers, businesses, donors, and government entities.



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- The agency's observed administration and management infrastructure and practices are weak or non-existent; or show signs of neglect, stagnation, or deterioration.
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Table of Evidence

Self-Study Evidence

County/Municipality Administered Agency, State Administered Agency (Central Office), or other Public Entity

- Written statement provided to persons served that clarifies the relationship between the private practitioner and the agency
 - Policy regarding ethical referral practices (PA-ETH 5.02)
 - Policy prohibiting preferential treatment
- ##### **State Administered Agency (Regional Office)**
- Documentation of policy communication with staff (e.g. memos, staff meeting minutes, training documents)

On-Site Evidence

County/Municipality Administered Agency, State Administered Agency (Central Office), or other Public Entity

- Review service-related referral procedures
 - Network client files to review reasons for referrals to particular providers
 - Network Management Manual
 - Network utilization
 - Data regarding referral and utilization patterns
- ##### **State Administered Agency (Regional Office)**
- No On-site Evidence

On-Site Activities

County/Municipality Administered Agency, State Administered Agency (Central Office), or other Public Entity

- Interview:
 - a. Agency head
 - b. Personnel at all levels
 - c. Persons served/community stakeholders
- Network interview:
 - a. Management Entity head
 - b. Network Advisory/Governing Body
 - c. Directors of agencies that contract with the managing entity
 - d. Network personnel involved in assessments and referral

State Administered Agency (Regional Office)

- Interview:

Purpose

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- a. Agency leadership
- b. Personnel at all levels
- c. Persons served/community stakeholders

PA-ETH 5.01

Personnel know and follow the code of ethics of their respective professions, and of the agency, as applicable.

PA-ETH 5.02

The agency prohibits:

- a. making or accepting payment or other consideration in exchange for referrals;
- b. steering, directing referrals to, or giving preference to clients easier or less costly to serve for specific agencies and practitioners within the agency;
- c. unfairly steering or directing referrals to, or "creaming" clients for specific network service provider agencies, such as network owners, or individual practitioners within the network, as applicable to networks; and
- d. steering or directing referrals to private practices in which personnel, consultants, or the immediate families of personnel and consultants are engaged.

Related: PA-ETH 2.04, PA-FEC 14.01

Interpretation: *It is permissible to include on referral lists personnel and consultants with private practices, or family members of personnel and consultants, but the agency may not actively direct service recipients to the practices of these individuals.*

Note: *Element (c) only applies to network management entities.*

PA-ETH 5.03

The agency prohibits preferential treatment of members, community partners, advisory groups, personnel, or consultants in applying for and receiving the agency's services.

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The agency earns and sustains the public trust through honest, truthful, and responsible transactions, partnerships, and relationships with individuals, communities, providers, businesses, donors, and government entities.



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PA-ETH 5.04

An agency requires practitioners with a private practice on its premises to provide their clients with a written statement that clarifies the relationship between the private practitioner and the agency.

Interpretation: *As an example, the statement would make it known if a practitioner is also an employee of the agency, and clearly indicate that the client is not being served by the agency.*

NA *Private practice is not permitted on the agency's premises.*

Purpose

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Ethical Practice

PA-ETH 6: Research Protections

An agency that participates in or permits research involving service recipients establishes the right of individuals to refuse to participate without penalty and guarantees participants' confidentiality.

Interpretation: *All research involving service recipients is conducted in accordance with applicable legal requirements. For purposes of PA ETH 6, research includes all forms of internal or external research involving service recipients, except internal program evaluation and outcomes research, and educational projects carried out by students and interns as part of their professional training.*

Agencies serving children and youth who are wards of the state are advised to consult Code of Federal Regulations 45 CFR § 46.4.09 and 21 CFR § 50.56. These regulations specify who can participate in research and that an advocate must be appointed for each participating child.

NA *The agency does not permit research involving service recipients.*

NA *State Administered Agency Regional Office*

Rating Indicators

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3) Partial Implementation, Concerning Performance

- A rating of (3) indicates that the agency's observed infrastructure and/or practices require significant improvement.
- The agency has not implemented the basic framework of the standard

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but instead has in place only part of this framework.Â Â

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Table of Evidence

Self-Study Evidence

County/Municipality Administered Agency, State Administered Agency (Central Office), or other Public Entity

- Human subject research policy and procedures
 - Informed consent form template
- State Administered Agency (Regional Office):**
- Evaluated in the Central Office only

On-Site Evidence

County/Municipality Administered Agency, State Administered Agency (Central Office), or other Public Entity

- Informed consent forms for research activities
 - Minutes from research proposal meetings
- State Administered Agency (Regional Office)
- Evaluated in the Central Office only

On-Site Activities

County/Municipality Administered Agency, State Administered Agency (Central Office), or other Public Entity

- Interview:
 - a. Agency head
 - b. Governing Body
 - c. Personnel at all levels
 - d. Persons served/ stakeholders
- State Administered Agency (Regional Office)
- Evaluated in the Central Office only

Purpose

The agency earns and sustains the public trust through honest, truthful, and responsible transactions, partnerships, and relationships with individuals, communities, providers, businesses, donors, and government entities.



Ethical Practice

PA-ETH 6.01

The identity and privacy of participants is safeguarded in all phases of research conducted by, or with the cooperation of, the agency.

Interpretation: *Statistical analyses, reports, and summaries are compiled and presented in a manner that masks the identity of the research participants. Case examples from individual case records must be prepared, prior to dissemination, in a manner that masks the individual's identity.*

PA-ETH 6.02

The agency has a mechanism to review research proposals involving service recipients, such as a human subjects committee or an internal review board, that reports to the agency head or senior management.

Interpretation: *The committee makes recommendations regarding the ethics of proposed or existing research, decides whether or not to approve research proposals, and monitors ongoing research activities.*

PA-ETH 6.03

Research participants, or a parent or legal guardian, sign a consent form that includes:

- a. a statement that he or she voluntarily agrees to participate;
- b. a statement that the agency will continue to provide services whether or not he or she agrees to participate;
- c. an explanation of the nature and purpose of the research;
- d. a clear description of possible risks or discomfort, as applicable; and
- e. a guarantee of confidentiality.

Purpose

The agency earns and sustains the public trust through honest, truthful, and responsible transactions, partnerships, and relationships with individuals, communities, providers, businesses, donors, and government entities.