



# Cuyahoga County Board of Developmental Disabilities

## **Compliance Plan**

**January, 2016**

### **CODE OF CONDUCT**



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Our organization has faithfully worked for the betterment of the lives of individuals with developmental disabilities in Cuyahoga County for over 47 years. We must always stand for honesty and integrity at the highest level. That is our shared value. To this end, we provide this important resource, the Cuyahoga County Board of Developmental Disabilities Code of Conduct.

The Code of Conduct provides the ethical principles and legal responsibilities which guide your efforts. All Cuyahoga County Board of Developmental Disabilities members, employees, contractors, and volunteers are required to observe this Code of Conduct; abide by our policies, rules and regulations; and conduct every action on behalf of individuals receiving supports and services in an ethical manner.

When you have finished reviewing the Code of Conduct, you must submit an acknowledgement form. (Directions will be provided.)

If you have any questions or concerns regarding any situation arising in your employment or other activity involving CCBDD operations, please contact your Department Head, In-house Counsel or the Compliance Officer. The ethics hotline is 216-931-7440, if you are unable to reach any of us or if you prefer to report a problem in this manner. We will respond to all concerns as soon as possible.

**The Cuyahoga County Board of Developmental Disabilities has a firm commitment that there will be no retribution or retaliation for asking questions or raising good faith concerns about improper conduct.**

Thank you for all that you do for the individuals we support and serve.

Sincerely,  
Compliance Officer

Noelle T. Tsevdos  
216-736-2654

Compliance and Ethics Hotline  
216-931-7440

## MISSION

**Our Mission is to support and empower people with developmental disabilities to live, learn, work and play in the community.**

## CODE OF CONDUCT

The Cuyahoga County Board of Developmental Disabilities (“CCBDD”) provides this guidance to all personnel in our daily activities to ensure that our conduct and business activities comply with ethical and legal standards. Honesty and integrity guide our interactions with individuals with developmental disabilities and their families or caregivers, co-workers, vendors, providers, consultants and the general public.

All officers and employees who operate on behalf of or represent the CCBDD must hold the following values and act accordingly:

- Treat all individuals receiving supports and services by the CCBDD with compassion, kindness, dignity and respect.
- Act lawfully with honesty, integrity and fairness when conducting CCBDD business.
- Treat all members of the CCBDD community with compassion, kindness, dignity and respect.
- Maintain the highest possible ethical and moral standards and perform within state, federal and local laws, rules and regulations.

## Relationships with Individuals and Their Families or Caregivers

The CCBDD will use the principles embodied in person-centered planning (PCP) as the guiding philosophy for the conduct of all of our efforts with individuals and their families or caregivers. We have resolved that the accepted format for the provision of needed supports and services shall be through service coordination as opposed to programs.

1. **Individuals are fully informed of their rights**, including the right to make decisions regarding their lives. All CCBDD employees receive training about person-centered planning.
2. **Promote autonomy and self-determination** by supporting informed choice and decision-making, access and control over needed resources, and encouraging responsibility.
3. **The CCBDD shall take all necessary steps to ensure the general health and safety of individuals.** When the health and safety of an individual is at risk, the CCBDD will provide necessary supports (e.g. MUI investigation, service coordination and/or other crisis supports). Such supports may be provided prior to the establishment of the individual’s eligibility for services from the CCBDD.
4. **The CCBDD shall conform to all requirements for privacy and confidentiality** set forth in state and federal law.
5. **Eligibility for programs and services** shall be based on the presence of a developmental disability as defined by state rule.
6. **Employees shall not hire individuals** for private work except as reviewed and approved by the Compliance Officer or Ethics Council. Nothing in this provision shall preclude an employee from hiring or purchasing services from a company that employs an individual(s) receiving supports and services at the prevailing or legal rate of pay.
7. **Employees shall not solicit gifts from individuals receiving supports and services,**

their families or caregivers.

8. **Employees shall not have a personal relationship similar to “dating” with any individual receiving supports and services or their family members. Any such relationship shall respect and maintain professional boundaries.**
9. **Employees shall not initiate contact with individuals or their family members on social media.**
10. **Employees may not accept gifts from individuals** or their families having a value greater than \$25 nor more frequently than two times per year. Gifts cannot have monetary value (i.e., gift card). De Minimis gifts of flowers, fruit, candy etc. are acceptable.

## **Relationships with Co-Workers**

Employees are expected to know and support our mission. They are expected to learn the necessary rules and regulations and to follow them. They are expected to work carefully, diligently and effectively. All employees are expected to be honest and to conduct themselves in a manner that demonstrates sensitivity towards their co-workers and the many community agencies and organizations with whom they work or interact. They are expected to represent our program in a positive way to the best of their abilities.

1. **The CCBDD supports and encourages** an environment in which individual and cultural diversity are accepted, respected and valued.
2. **Employees are expected** to recognize and treat each person with respect as an individual.
3. **Employees shall always refrain from acts** that will be harmful to the CCBDD, other employees or any individual receiving supports and services served.
4. **Employees who have knowledge of ethical violations**, including gross neglect of duty or any misconduct by a CCBDD contractor or provider, must report the information to their supervisor or another member of management. If no corrective action is taken, the employee must report the information to the Compliance Hotline at **(216) 931-7440**.

## **Relationships with Vendors and Providers**

Providers and other CCBDD contractors must be in compliance and maintain compliance during the course of the contract with all relevant applicable state and federal law and regulations that govern licensure, certification, and provision of service or funding as appropriate.

1. **The Superintendent will be accountable** for maintaining the public records of the CCBDD subject to all applicable federal, state and local laws and regulations.
2. **It is essential that the public maintain confidence** in the employees of the CCBDD. For this reason, it is important that CCBDD employees refrain from any action which involves using public office or his/her position for personal/private gain, or giving preferential treatment to any individual, group or entity. This includes taking any action that could benefit an immediate family member or creates the appearance of impropriety.

## **Regulatory Compliance**

CCBDD employees must follow the provisions of state and federal law as it relates to the supports and services provided to individuals:

1. **Lawful conduct:** CCBDD services are provided within the framework of appropriate and applicable federal, state and local laws and regulations.
2. **Knowledgeable personnel:** All CCBDD staff members and any service providers (including contracted) must be knowledgeable about and ensure compliance with existing laws and regulations. Any violations or suspected violations must be reported immediately to an employee's supervisor, the Manager of Provider Review and Provider Support, the compliance hot line or the Compliance Officer.
3. **Review of legal updates:** The CCBDD carefully reviews any changes or additions to federal or state law to ensure that our policies and procedures comply with such changes or additions.

### **Cooperation with Investigations, Audits, Inspections**

The CCBDD shall respond to and cooperate with any law enforcement investigations and government or accrediting agencies in an honest and forthright manner. All employees are expected to cooperate with and be courteous to all law enforcement investigators and government or accrediting agency inspectors or auditors. Information shall be provided as required for them to perform their investigation, inspection or evaluation. Documents must not be withheld, concealed, altered or destroyed either during or prior to an investigation or inspection. CCBDD employees must not lie or make misleading statements or cause a colleague to obstruct, mislead or delay communication of information or records to an investigator, inspector or surveyor.

### **Information and Information Systems**

The following rules govern CCBDD employees regarding their use of information systems and record-keeping:

1. **All CCBDD employees are charged with proper record maintenance.**
  - a. Accurate records are necessary to protect the integrity of and confirm the effectiveness of the CCBDD compliance program.
  - b. No employee may falsify information on a CCBDD record or document. Knowledge of any record discrepancy should be reported to management or the compliance officer.
2. **Retention of records:** All records will be retained in accordance with the law and CCBDD record retention procedures and schedules.
3. **Confidential information:** For every individual receiving services or supports, a complete record (hardcopy or electronic file) shall be maintained from his/her entrance into a CCBDD program until his/her exit from the program.
  - All information contained in the individual record shall be treated as confidential and shall be directly accessible only in accordance with applicable law and CCBDD policy.
4. **Requests of any type from the news media** must be forwarded to the General Manager of Communication.
5. **Requests for any employee information** must be forwarded to the Director of Human Resources or her designee.
6. **All CCBDD communications and information systems** are the property of the organization and are intended for CCBDD business use.
  - a. CCBDD electronic mail, Internet access and voice mail are the property of the CCBDD and should not be considered private or confidential. Further, CCBDD will monitor employee use of electronic mail and Internet access as necessary.
  - b. Internet access for personal use shall be confined to non-work time, i.e.: before and after work, authorized break times, lunch, etc. Additionally, accessing gambling,

pornographic or hate sites is prohibited at any time. See CCBDD Handbooks for further clarification.

**7. Personnel may not use any internal communication media for**

- a. Any threatening or maliciously false or obscene communication, or materials.
- b. Any material that violates any law constitutes a criminal offense or could expose an employee or the CCBDD to civil liability.
- c. Sending chain letters, personal broadcast messages or copyright/trademark-protected material.
- d. Employees who violate these guidelines may be subject to disciplinary action and loss of privileges. See Board policy.\*

## **Public Information and Community Relations**

CCBDD staff members and contractors are our face in the community. Your words, actions and attitudes do more to shape public perception about our organization and the individuals we support than any centralized public relations effort could ever accomplish. Regardless of the position you hold, you represent us in the eyes of parents, other agencies, neighbors, local businesses, employers, elected officials and the general Cuyahoga County community at-large. When they hear our name, they think of you. We ask that you keep that in mind in all of your interactions with others.

Because language is a reflection of how people see one another, we ask that you use *people-first language*. People-first language puts the person first, rather than the disability: a woman who has a developmental disability, a man or woman or people with developmental disabilities, not “developmental disabled people.” Never refer to a person as “confined to a wheelchair.” Wheelchairs enable people to escape confinement. A person “uses” a wheelchair. Try to describe people without disabilities as “typical” rather than “normal.”

As our society becomes more diverse, it is paramount that you respect all languages and make reasonable efforts, orally and in writing, to accommodate individuals whose primary language is not English. CCBDD maintains a listing of staff who are fluent in other languages and can assist with language translation needs. Please contact the Human Resources Department for this list. The Public Information & Communication Office can also assist by having key documents and informational/promotional materials translated into non English languages most common in Cuyahoga County.

All CCBDD publications, presentations and informational/promotional materials must include our full name and logo. Any agency receiving funding from CCBDD for services and supports provided to individuals with DD should include our full name and logo and credit CCBDD in all its publications, announcements, audiovisual and digital programs, websites and other printed and electronic media used to promote, publicize or communicate about those services and supports. The logo is available in digital and camera-ready formats from the Public Information & Communication Office.

## **Workplace Conduct and Conflicts of Interest**

All CCBDD personnel, but particularly officers, directors, managers and other key employees, have a duty of undivided and unqualified loyalty to CCBDD.

1. Persons holding such positions must not use their position to profit personally or to assist others in profiting in any way at the expense of CCBDD or individuals receiving supports and services.
2. Any member of the CCBDD management staff with a member of his/her immediate

family or household working for a CCBDD contract agency or provider is required to notify the Director of Human Resources of this relationship.

3. Employees may not provide paid service during non-working hours or during the summer to individuals receiving supports and services without the written permission the CCBDD Compliance Officer or the Board's Ethic's Council.
4. Employees shall not provide paid service or receive any form of compensation from a CCBDD contractor or other provider unless the Compliance Officer or the Board's Ethics Council has determined that no conflict of interest exists.
5. Classified (non-management) employees are prohibited by state law from becoming involved in any partisan political activity i.e. working for a candidate or political party or becoming a candidate for political office in a partisan race.
6. All employees are strictly prohibited from engaging in any partisan political activity involving candidates for the following offices: Cuyahoga County Executive, Cuyahoga County Probate Judge, Cuyahoga County Prosecuting Attorney, Cuyahoga County Council, Attorney-General of Ohio, Governor of Ohio.
7. CCBDD does not prohibit an employee from holding another job in addition to your position of employment with the CCBDD. However, there are several provisions of the Ohio Revised Code and CCBDD policy that could impact whether CCBDD employees should be permitted to work for a CCBDD contractor or another provider of supports/services. Employees must check with the Compliance Officer prior to accepting employment with a CCBDD contractor or another provider of supports/services. Any outside employment cannot negatively impact the performance of your CCBDD job duties, as determined by your supervisor. If it appears that your outside employment is affecting your performance for CCBDD, you may be required to resign your second position of employment.
8. Ohio law may impose other restrictions on CCBDD employees.

## **Nepotism**

1. Members of the immediate families of board members or county appointing authorities may not be hired to work for the CCBDD.
2. No member of an employee's immediate family shall occupy any position in which he/she could directly supervise or otherwise influence a decision in favor of or against another member of the immediate family.

## **Accepting Gifts**

The following rules apply to gifts accepted by CCBDD employees:

1. Employees of CCBDD are prohibited from accepting anything of value that could be construed as an undue influence on the employee's impartial performance of his/her job duties as prohibited by the Ohio Ethics Law and the CCBDD's Ethics Policy.
2. To avoid an appearance of impropriety, gifts with a total cumulative value over \$25.00 **may not** be accepted from any individual or organization having a business relationship with CCBDD or from any person or entity seeking to do business with the CCBDD.
3. Employees may attend professional engagements that are related to their job duties so long as the events are not lavish, the cost of their portion of a meal or food/beverage service does not exceed a total value of \$25.00 or the employee reimburses the vendor, contractor or provider for the actual cost of the meal or food/beverage/entertainment service provided at the reception. Nothing in this paragraph prohibits employees from

receiving travel expense reimbursement from the CCBDD.

4. CCBDD employees may not accept cash, checks or other forms of money as a gift.
5. CCBDD employees may accept de minimis gifts from individuals receiving supports and services or their family members. A de minimis gift may not have a value over a \$25.00 value such as a tin of cookies or popcorn, a box of candy or a small fruit basket. Employees are responsible for returning any gift received that does not comply with these guidelines.

### **Honoraria/Travel Expenses for Speaking Engagements**

Employees are not allowed to accept honorariums offered as an incentive to attend or participate in a conference or other speaking engagement. Employees may be permitted to accept the payment of travel expenses in connection with their attendance at a conference or other speaking engagement in accordance with Ohio Ethics Commission guidance. Employees must consult with their Department Head before participating in any such speaking engagement.

### **Sponsoring Business or Educational Events**

CCBDD may sponsor events for business or educational purposes. When such events are sponsored, meals may be provided in compliance with the guidelines issued by the Business and Financial Services Department. Prior approval of the Superintendent or Chief Administrative Officer is required.

### **Appropriate Use of CCBDD Resources**

Employees have a duty to preserve and protect the assets of CCBDD. Theft, carelessness, and waste have a direct impact on our service to individuals receiving supports and services and our organization's effectiveness. Employees may not use CCBDD property for private use or personal gain. See CCBDD Policy Manual and Employee Handbooks for more detail.

### **Fund Raising**

The Superintendent or General Manager of Communication may authorize the use of CCBDD resources for charitable purposes or fund raising drives:

1. When such fund raising activities are authorized, CCBDD resources, including employee time, facilities and supplies may be utilized to the extent that it does not interfere with an employee's ability to perform his/her job duties or the use of resources is de Minimis.
2. No employee should be made to feel coerced or compelled to participate in these causes.

### **Personal Fund Raising**

Upon approval of the General Manager of Communication and the Facility Manager, an employee may raise funds at his/her work site for charitable or benevolent purposes. Any such activity must comply with guidelines issued by the Human Resource Department.

## **Relationships with Subcontractors, Suppliers and Educational Institutions**

Employees who are responsible for the award of contracts or purchase of services, supplies or materials using CCBDD funds must follow the following guidelines:

1. CCBDD employees shall follow the highest ethical standards in negotiating and determining the type and nature of our business relationships and the award of contracts following the Purchasing Manager's procedures.
2. Relationships with outside entities must be consistent with current applicable laws, board policy and industry standards.
3. Selection of subcontractors, vendors and suppliers will be made based on objective criteria including cost, quality and technical excellence of goods and services, timeliness and adequacy of delivery, quality of customer service, and, when appropriate, competitive bidding requirements.
4. Department Heads may approve written agreement(s) with educational institutions for the placement of interns or other graduate program students in connection with professional licensing requirements. The written agreements shall define both parties' roles prior to the placement of an intern or other graduate program student in any CCBDD facility. In all cases, students and personnel representing educational institutions will fall under the CCBDD code of conduct while at any CCBDD facility.

## **License and Certification–Vendors and Contracted Services**

Independent contractors who are required to maintain professional licenses or certification are responsible for maintaining their credentials in good standing and shall comply with all applicable federal and state requirements for their respective disciplines. CCBDD monitors such compliance and retains the right to request evidence of current licensure from independent contractors. CCBDD shall not allow any independent contractor to operate without valid current licensure as such credentialing is a requirement to lawful practice.

## **Research**

The Superintendent or Chief Clinical Officer must approve all requests to conduct any research or studies prior to their commencement following the guidelines and procedures set forth in the Board Policy Manual. Research or studies performed by CCBDD or associated groups must be conducted within the highest ethical standards. Research misconduct is not tolerated. This includes falsifying the results of research to affect or alter conclusions and/or claiming the results of other research or studies without actually performing the research.

## **Environmental Compliance**

It is the goal of the CCBDD to comply with all environmental laws and regulations and to maintain appropriate permits and controls, as required. Additionally, it is our goal to be as "environmentally friendly" as possible, preserving natural resources through efficient operation and frugal use of water, power and other resources. All hazardous and medical waste will be disposed of in a manner consistent with laws and regulatory guidelines.

## **Controlled Substances/Alcohol and Illegal Drugs**

CCBDD is committed to an alcohol-and drug-free work environment. All employees are

required to follow the Drug Free Workplace regulations. (See Employee Handbooks)

## **Courtesy and Diversity Issues and Workplace Harassment**

Courteous treatment of all persons without regard to their race, creed, color, sex, national origin, ancestry, age, disability, veteran status, sexual orientation, religion or socio-economic status is a key element in creating and maintaining positive relationships with all of the individuals we interact with. All employees are afforded the right to work in an environment free from harassment, discriminatory intimidation, ridicule and insult based on any of these factors.

### **Sexual Harassment**

The CCBDD does not tolerate workplace sexual harassment. Sexual harassment is a form of unlawful discrimination and is defined to include unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature when:

1. Submission to or rejection of this conduct is used as a factor in decisions affecting hiring, evaluation, promotion or other aspects of employment; or
2. The conduct has the purpose or effect of interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.

No supervisor or manager shall directly or indirectly imply or threaten that an applicant's or employee's refusal to submit to sexual advances will adversely affect his or her employment, employment conditions or career development. No supervisor or manager shall suggest that an applicant's or employee's acquiescence to sexual advances may favorably affect his or her conditions of employment or career development.

Other unlawful harassing conduct in the workplace, whether committed by supervisory or non-supervisory personnel, is also prohibited. This behavior includes, but is not limited to, offensive sexual flirtations, sexually degrading or vulgar words, unwelcome touching or physical contact, whistling, unwarranted sexual compliments, innuendoes, suggestions or jokes, the display of suggestive objects or pictures and the use of offensive gestures or body motions.

This behavior is unacceptable in the workplace and in other settings such as business trips and business-related social events. (See Employee Handbook)

### **Interactions with Individuals**

Individuals receiving supports and services have inherent rights to be treated with dignity and respect. CCBDD employees have been placed in a position of trust and have the privilege of working with these individuals. CCBDD employees are expected to provide the highest level of customer service to individuals receiving supports and services, their family members and caregivers.

### **Health and Safety**

It is the policy and practice of the CCBDD to provide a healthy and safe environment in which to work. Policies have been developed to assist in protecting you from potential workplace hazards. It is each employee's responsibility to promote workplace safety. Unsafe situations should be reported to your supervisor, department head, facility manager, Building Operations Manager, or the Risk Manager.

## **Confidentiality**

All CCBDD officers, employees, contractors, vendors and providers are required to comply with state and federal privacy laws and confidentiality requirements.

## **The Compliance Program**

The CCBDD has proclaimed that compliance with all federal and state guidelines is a critical goal, and establishing and maintaining an active compliance program is key to the operation of CCBDD. The CCBDD further specifies that the Compliance Officer, as spokesperson for the Compliance Committee, will have access to the board and Superintendent, and that the Compliance Program will have adequate funding and staff to perform designated responsibilities fully. When necessary, the Compliance Committee will seek the advice of CCBDD In-House Counsel. The Superintendent will have ultimate authority and responsibility for the implementation of a viable Corporate Compliance Program.

## **The Compliance Officer**

The Compliance Officer is responsible for the following:

1. Overseeing and monitoring the implementation of the Compliance Plan.
2. Meeting, when necessary, with the CCBDD board, Superintendent, and Compliance Committee to report on the progress of implementation, assist them in establishing methods to improve the agency's efficiency and quality of services, and reduce the agency's vulnerability for fraud, abuse and waste.
3. Periodically revising the Compliance Program to reflect changes in the needs of the agency and changes in applicable state and federal law.
4. Developing, coordinating and participating in a multifaceted education and training program that focuses on the elements of the compliance program and seeks to ensure that all employees, managers, vendors, providers and other contractors are knowledgeable about the program and applicable federal and state law.
5. Ensuring that independent contractors, vendors, agents, and providers who furnish services to CCBDD or individuals receiving supports and services are aware of the requirements of the agency's compliance program with respect to all concerned activities and agree to adhere to the pertinent components of the program, as well as applicable federal and state law.
6. Coordinate with Human Resources Department to ensure that the Bureau of Criminal Identification and (BCI) and DODD abuser register have been checked with respect to employees and appropriate contractors.
7. Participating with the agency's Finance and Business Services Department in coordinating internal compliance review and monitoring activities including periodic reviews of departments.
8. Independently investigating and acting on matters related to compliance in response to reports of problems or suspected violations and working through the Compliance Committee to recommend and take corrective action with appropriate CCBDD departments, providers and contractors.
9. Take reasonable steps to ensure a policy of non-retribution, anti-retaliation and personal involvement to encourage officers, managers and employees to report suspected fraud and other improprieties.

The Compliance Officer will have the authority to review all documents and other information relevant to compliance activities, including individual records, billing records, HR records and contractual arrangements with other parties.

## Reporting Violations

CCBDD is committed to lawful and ethical conduct throughout our operations. The Compliance Officer is responsible for investigating all suspected wrongful activities and correcting all illegal or unethical activities.

1. All CCBDD employees have a duty to report such suspected activities.
2. If all employees are vigilant in noting, documenting and reporting suspected activities, such activities will not be able to continue and CCBDD will maintain a standard of integrity that is beyond reproach.
3. When you encounter a situation that you believe to be unethical or in violation of the code of conduct, please consult your Department Head or the Compliance Officer.
4. If you feel uncomfortable doing this or it is inappropriate for a given situation, you may contact the compliance officer, or call the Compliance Hotline at **(216) 931-7440**. There will be no retribution or retaliation for asking questions or raising good-faith concerns about possible improper conduct. Concerns may be reported confidentially or anonymously.
5. Employees reporting violations of state law may be afforded legal protection by section 4113.52 of the Ohio Revised Code which is known as the "Whistle Blower" statute.

## Investigations of Reports

An investigation of all reported concerns will be initiated within 72 hours of receipt and investigated promptly and thoroughly, while maintaining confidentiality to the fullest extent possible.

1. The Compliance Officer will coordinate the investigation and promptly recommend corrective action.
2. All employees are expected to cooperate fully with such investigations.
3. All concerns reported via the hotline or through other methods will be fully documented, along with the results of the investigation and corrective action taken (if applicable). This documentation is maintained by the Compliance Officer and must include the following:
  - a. Description of the alleged violation;
  - b. Description of the investigative process;
  - c. Copies of the interview notes and key documents;
  - d. A log of witnesses interviewed and documents reviewed;
  - e. Results of the investigation and any disciplinary action taken;
  - f. Corrective action implemented.
4. The individual reporting a concern may obtain a verbal summary regarding that investigation from the Compliance Officer.
5. Additionally, the Compliance Officer will present a regular report of concerns and investigations to the Compliance Committee, the Executive Council and the Superintendent.
6. **Individuals should not be fearful of reporting possible violations. The CCBDD will endeavor to protect the reporter from any retaliation.**

## Corrective Action

When violations are discovered as a result of an investigation, corrective action will be taken. Appropriate corrective actions may include, but are not limited to, the following:

1. Prompt restitution of any overpayment amounts
2. Notifying the appropriate government or other agency
3. Disciplinary action, as appropriate to the circumstances.
4. Making system changes to prevent a similar violation or problem from reoccurring.

When, after investigative inquiry, CCBDD has reasonable grounds to believe that misconduct either violates law or constitutes a violation of civil law or rules and regulations governing federally funded programs, CCBDD will contact the appropriate government authority within 7 days, pending the advice of legal counsel.

Potential cost impact and any evidence relating to the misconduct will be turned over to the proper authorities to the extent approved by counsel.

## **Discipline**

All violators of the CCBDD Code of Conduct will be subject to disciplinary action. The discipline, in each case, will be determined in accordance with the CCBDD's progressive disciplinary process.

## **Employee Education/Evaluating Employee Compliance**

1. All employees will be made aware of the CCBDD Code of Conduct and will be asked to sign an acknowledgment indicating they have reviewed and understand the code and are aware of the requirement to report suspected violations of the code.
2. New employees will receive orientation on the Code of Conduct and be asked to sign an acknowledgement.
3. As an indication of the CCBDD commitment to lawful and ethical behavior, compliance issues will be considered in decisions regarding the hiring, annual evaluations and promotion of CCBDD managers and supervisors and other personnel as appropriate.

## **Non-Employment of Sanctioned Individuals**

1. CCBDD will conduct a check on all new employees and all prospective employees to ensure they are not listed on the Ohio Department of DD's Abuser Register.
2. Current employee checks will be conducted annually.
3. Groups or individuals in a contractual arrangement with CCBDD will be checked for appropriate credentialing and to ensure that they are not employing persons in a direct Service position whose name is listed on DODD Abuser Registry.
4. Contracts will be terminated with individuals or agencies that no longer meet certification or licensure standards as mandated by applicable federal and state laws.



Cuyahoga County Board Developmental Disabilities  
1275 Lakeside Avenue East, Cleveland, Ohio 44114-1132  
(216) 241-8230

[www.Cuyahogabdd.org](http://www.Cuyahogabdd.org)

Compliance Officer: Noelle Tsevdos 216-736-2654

Compliance and Ethics Hotline: 216-931-7440