

**Cottonwood, Inc.
Policies and Procedures**

SECTION: Personnel
SUBJECT: Conflict of Interest
EFFECTIVE DATE: July 1987

POLICY NO: 03-031
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Policy:

Employees of Cottonwood, Inc. are prohibited from becoming conservator's legal guardians or durable powers of attorney for any consumer who receives services from Cottonwood, Inc. However, Cottonwood, Inc. may serve as organizational payee if certain conditions can be met. Cottonwood, Inc. also has a do not solicit agreement.

Procedures:

1. As of April 2016 closely involved family members or legal guardians of individuals who receive services from Cottonwood, Inc. will not be eligible for employment at Cottonwood, Inc. due to potential conflict of interest. For employees grandfathered in (prior to 4/20) if a conflict of interest is identified it will not be possible for both the consumer to receive services and the employee to retain their position.
2. Staff members will maintain professional ethics in relationships with consumers at all times, whether during work or non-work hours. Staff, including production workers, may not date consumers. Business transactions are prohibited between staff and consumers. Staff will not "friend" a consumer or accept "friend" status offered by a consumer on any social networking site.
3. Former employees who wish to become conservators, legal guardians for a consumer who receives Cottonwood, Inc. services must wait a period of two years from date of resignation before Cottonwood, Inc. would recommend them for guardianship or conservatorship.
4. Board members for Cottonwood, Inc., Cottonwood Foundation, Cottonwood Housing Corporation, and Cottonwood Trail, are required to disclose any potential areas of conflict of interest by completing the "Conflict of Interest Questionnaire for Members of the Board" and the "Related Party" Questionnaire."
5. Staff are prohibited from serving as a legal witness to a signature on a Health Care Proxy, DNR, or advance directive. However, Cottonwood, Inc. employees may serve as notaries. Staff may witness documents of a routine nature only to attest that they saw the person sign the document.
6. The exchange of gifts, money, personal property and gratuities between staff and consumers is discouraged. However, exceptions such as Silver Bells holiday gifts are allowed. At times, family members may want to provide a small gift to a staff person, a building, a residence, or another group. These are allowed with permission of the

Department Director. Group gifts should not value more than \$50. Individual gifts should not value more than \$20.

7. Cottonwood, Inc. employees are prohibited from engaging in any transactions on behalf of the organization when they have an undisclosed personal interest in the transaction. Failure to report or act upon such suspected or known conflictual relationships could result in disciplinary action. Also, see policy 04-032.