



CSBG
Policy and
Procedure Manual

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Dear CSBG Family Development Specialists,

This policy and procedure manual has been compiled for your information and reference. Policies are subject to change by the executive director and program director.

If you have further questions please notify the Center Director, Planning Director, or Executive Director.

You may also view the Personnel Policies and Safety Handbook for more information.

Sincerely,

Sheri Wilson, Executive Director, JD, CCAP, NCRT
Rachel Albrecht, Planning Director, BASW, NCRT
Lisa Nafziger, Center Director, MBA

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Equal Opportunity

Community Action of Southeast Iowa is committed to providing equal opportunity in employment and program participation for all people without regard to race, color, creed, national origin, religion, pregnancy, sex, gender identity, sexual orientation, age, physical or mental disability, genetic information, veteran’s status, uniformed service, or any other characteristic protected by federal, state or local law.

CSBG Assurances

The community action agency agrees to the following Community Services Block Grant (CSBG) Act assurances and other CSBG program requirements:

1. To use funds made available through the CSBG Act to support activities as described in section 676(b)(1) of the Act (Instructions, Section IV. Community Services Block Grant Act Assurance of Funds);
2. To provide, on an emergency basis, for the provision of such supplies and services, nutritious foods, and related services, as may be necessary to counteract conditions of starvation and malnutrition among the low-income individuals;
3. To coordinate, and establish the linkages, between governmental and other social services programs to assure the effective delivery of services to low-income individuals and to avoid duplication of such services, and will coordinate the provision of employment and training activities in the State and in communities with entities providing activities through statewide and local workforce investment systems under the Workforce Investment Act of 1998;
4. To the maximum extent possible, coordinate programs with and form partnerships with other organizations serving low-income residents of the communities and members of the groups served by the State, including religious organizations, charitable groups, and community organizations;
5. To establish procedures under which a low-income individual, community organization, or religious organization, or representative of low-income individuals that considers its organization, or low-income individuals, to be inadequately represented on the board (or other mechanism) of the eligible entity to petition for adequate representation;
6. To participate in the Results Oriented Management and Accountability System, or another performance measure system for which the Secretary facilitated development pursuant to section 678E(b) of the CSBG Act;
7. To comply with the prohibition against use of community services block grant funds for the purchase or improvement of land, or the purchase, construction, or permanent improvement (other than low-cost residential weatherization or other energy-related home repairs) of any building or other facility, as described in section 678F(a) of the CSBG Act;
8. To inform custodial parents in single-parent families that participate in agency programs, activities, or services, about the availability of child support services, and refer eligible parents to the child support offices of State and local governments;
9. To ensure that programs assisted by community services block grant funds shall not be carried on in a manner involving the use of program funds, the provision of services, or the employment or assignment of personnel in a manner supporting or resulting in the identification of such programs with any partisan or nonpartisan political activity or any political activity associated with a candidate, or contending faction or group, in an election for public or party office; any activity to provide voters or prospective voters with transportation to the polls or similar assistance with any such election, or any voter registration activity;
10. To ensure that no person shall, on the basis of race, color, national origin, or sex be excluded from participation in, be denied the benefits of, or be subjected to discrimination under, any program or activity funded in whole or in part with community services block grant program funds. Any prohibition against discrimination on the basis of age under the Age Discrimination Act of 1975 (42 U.S.C. 6101 et seq.) or with respect to an otherwise

- qualified individual with a disability as provided in section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794 et seq.), or title II of the Americans with Disabilities Act of 1990 (42 U.S.C. 12131 et seq.) shall also apply to any such program or activity;
11. To comply with section 679 of the CSBG Act (Operational Rule)—concerning religious organizations;
 12. To comply with section 676B of the CSBG Act (Tripartite Boards)—concerning governing board structure and governing board participation;
 13. To comply with the requirements of the cost and accounting standards of the Office of Management and Budget (Title 2 of the Code of Federal Regulations, Uniform Administrative Requirements, Cost Principals, and Audit Requirements for Federal Awards (2 CFR 200);
 14. To comply with the requirements of Public Law 103-227, Part C Environmental Tobacco Smoke, also known as the Pro-Children Act of 1994, which requires that smoking not be permitted in any portion of any indoor facility owned or leased or contracted for by an entity and used routinely or regularly for the provision of health, day care, education, or library services to children under the age of 18 if the services are funded by a Federal grant, contract, loan, or loan guarantee; and
 15. To comply with the requirements of CSBG, Information Memorandum Transmittal No. 138, State Establishment of Organizational Standards for CSBG Eligible Entities under 678B of the CSBG Act.

Procedures for Serving Persons with Limited English Proficiency

Community Action of Southeast Iowa understands the importance of being able to communicate with all individuals seeking assistance with our agency, especially for persons with limited English proficiency. In order to accommodate the needs of persons seeking assistance, staff is to follow the procedure listed below when working with those who have limited English speaking abilities.

1. When an appointment is made for a client, the staff will inquire as to whether or not a translator will accompany the client. If not, the staff person will locate a translator.
2. The first option is to locate a staff person who speaks Spanish or another language to assist with interpreting.
3. If a staff person is not available or we do not have a staff person who can interpret for the client, the staff person will contact people in the community who have agreed to assist with translation.
4. A list of Community Volunteers will be available in a convenient place for all staff to access. If a volunteer is not available the staff person will seek the services of a paid interpreter.

Procedures for Deaf, Hard-of-Hearing, or Speech impaired Customers

Customers who are deaf, hard-of hearing, or have speech impairments may use Relay Iowa to communicate with other individuals. Relay Iowa is a telecommunications relay service that provides full telephone accessibility to people who are deaf, hard-of-hearing or speech impaired. Specifically trained Communication Assistants (CAs) process relay calls and stay on the line to relay conversations electronically, over a Text Telephone (TTY) or verbally to hearing parties. The service is available 24 hours a day, 365 days a year, with no restrictions on the number of calls placed or on their length. This

valuable communications tool gives all individuals who are deaf, hard-of-hearing or speech impaired the opportunity to make personal and business calls just like any other telephone user. Both TTY and voice users may initiate calls through Relay Iowa. You may receive a call through the Relay Iowa system from a person seeking information and/or assistance from our agency. The numbers to use Relay Iowa are as follows.

Relay Iowa Service Numbers

7-1-1 or (800) 735-2942
(800) 735-2943 Voice
(800) 735-4313 Voice Carry Over (VCO) Direct
(877) 735-1007 Speech to Speech Service
(800) 855-8440 Visually Assisted Speech-to-Speech (VA STS)
(800) 264-7190 Spanish (includes Spanish-to-Spanish and translation from English to Spanish)

Calling Protocol

Please have the telephone number that you wish to call ready in advance. If you would like to use a CA who is the same gender, please make that request when the CA answers your call. Then give the phone number you are calling. Voice users should speak clearly and at a moderate speed. Direct your conversation to the party you are calling as if the CA were absent.

Correct: Hello, Jim. The meeting is at two this afternoon. Can you come? Go ahead.

Incorrect: Hello, Communication Assistant. Please tell Jim the meeting is at two this afternoon. Can he come? Go Ahead.

The CA is required to relay everything that you type or speak, and will also relay all background noises. For example, a fire alarm ringing in the background will be relayed.

For Voice Users

Standard telephone users can easily initiate calls to TTY users. The CA types the hearing person's spoken words to the TTY user and reads back the typed replies.

For TTY Users

A person who is Deaf, hard-of-hearing, deaf-blind, or speech impaired uses a TTY to type his/her conversation to a Communication Assistant (CA), who then reads the typed conversation to a hearing person. The CA relays the hearing person's spoken words by typing them back to the TTY user.

For Voice Carryover Users

Voice Carryover (VCO) allows Deaf and hard-of-hearing users to speak directly to a hearing person. When the hearing person speaks to you, a Communication Assistant will serve as your "ears" and type everything said to you on a TTY or text display.

Non-Documented Citizens Inclusion

Non-documented citizens will have access to agency services regardless of their alien status unless otherwise restricted by specific program funding.

Non-citizens shall not be banned from CSBG programs based solely on their alien status unless such exclusion is already authorized by another statute.

To the fullest extent possible non-citizens shall be eligible for agency services.

Child Support Services Procedure

Community Action Agencies are required through the Community Service Block Grant (CSBG) Act to provide information to custodial parents in single parent families of the availability of child support services.

Each time a custodial parent from a single parent family requests information or services from Community Action of Southeast Iowa, the staff person needs to follow this procedure:

1. Determine if the parent is receiving child support for their child(ren).
2. If the parent is not receiving child support, ask them if they are aware that they may be eligible to receive child support from the non-custodial parent.
3. If the parent is interested in receiving information regarding their eligibility for child support, refer them to the closest Child Support Recovery Office and give the parent a copy of the Child Support Services Statement.
4. Information on where/how to contact the local Child Support Recovery Unit.
 - Via the web at <https://childsupport.ia.gov>
 - Child Support automated information line: 1-888-229-9223, 24 hours a day, 7 days a week
 - Or at the local office:
 - Burlington Child Support Recovery Office
 - 409 North 4th Street, Burlington Iowa
 - 319-753-6322
5. Mark the referral in NIFCAP.

Child Abuse

It's everyone's responsibility to report.

If you suspect a child under the age of 18, a dependent adult, or an elderly person, is being abused or neglected please call:

- The child abuse hotline at 1-800-362-2178 (available 24 hours a day, 7 days a week). Please be ready to provide identifying information and the whereabouts of the child. You may remain anonymous.
- If you believe the child or adult is in imminent danger, call 911 immediately.

You can download the guide for Mandatory Reporters and the form for reporting suspected child abuse from the DHS website: <https://dhs.iowa.gov/child-abuse>

Work at Client Homes

Employees of Community Action of Southeast Iowa are required to follow all client safety and security procedures when working at client homes.

1. Prior to an employee leaving to work at a client's home, they must notify a supervisor or other individual about their schedule and the home location.
2. Employees should be aware of emergency exit locations.
3. If the home cannot be safely accessed (broken steps, snow, ice), the employee should leave and report the issue to their supervisor.
4. If pets are in the home, request that the client secure the pet in another room or a kennel.
5. If an employee feels unsafe in a client's home they should notify their supervisor so precautions can be taken.

Political and Religious Activities – Personnel Policy 58I

Community Action Agency of Southeast Iowa encourages its employees to participate fully in the democratic political process as private citizens. As a non-profit 501(c)(3) tax-exempt organization and recipient of Community Services Block Grant, Head Start and other federal funds, however, Community Action must follow certain rules concerning political and religious activity:

A. Activities by Individuals

1. Allowable Activities (Off- Duty). All Community Action employees and board members may engage in the following activities as private citizens, if conducted during non-Agency work hours, off Agency premises; and without direct or indirect Community Action financial support or identification:
 - a) Hold membership and office in, attend meetings of, vote in, and otherwise participate in, political parties, clubs, organizations, and conventions.
 - b) Participate in and manage partisan or nonpartisan political campaigns, including volunteering, writing and making speeches, writing letters, and soliciting voters to support or oppose a candidate.
 - c) Be a candidate in a nonpartisan election for public office.
 - d) Contribute to partisan or nonpartisan political campaigns or political parties and request contributions (but not advise, command, coerce, or attempt to coerce such contributions) from others (except not from employees whom they supervise).
 - e) Participate in voter registration drives.
 - f) Assist in providing transportation to the polls.
 - g) Hold membership or leadership positions in any religious organization.
 - h) Participate in any religious activities of their choosing.
2. Prohibited Activities (On-Duty). While on-duty at Community Action, on Agency premises, or using Agency resources, employees and board members may not engage in any of the activities listed in 1, above.
3. Prohibited activities (at all times). In general, Community Action employees may not engage in the following activities at any time or place, including during off- duty hours, during leave of any type (including unpaid leave), and off Agency premises:
 - a) Be a candidate for public office in a partisan election (including primaries).
 - b) Use official authority or influence to interfere with or affect the results of an election or a nomination for office.
 - c) Directly or indirectly coerce, attempt to coerce, command or advise any employee of Community Action or other Community Action or Head Start Agencies to make political contributions, or request such contribution from Agency employees whom they supervise.

However, if the Community Action employee either: 1) spends less than half of his or her working time employed by Community Action or receives less than half of his or her working income from the agency; or 2) receives a salary which is not funded in any part by the Community Service Block Grant or Head Start and does not perform any work in connection with activities funded by the Community Services Block Grant or Head Start, the employee may be exempted from the restrictions stated above. In order to be exempted, the employee must receive written authorization from the agency Executive Director.

B. Activities by Community Action

1. Community Action may not participate or intervene in a political campaign on behalf or in opposition to any candidate for public office. Community Action employees should scrupulously avoid identification of the agency with, or use of its funds or resources for, such activity;
2. Community Action funds may not be used to make contributions to political campaigns, political parties, or political action committees;
3. Community Action may under certain conditions conduct limited activities designed to educate, but not influence, voters, such as neutral candidate forums or voter guides, voter registration drives, and transportation to the polls, but only if they are carried out by agency programs or employees not funded by the Community Services Block Grant or Head Start and receive the prior approval of the Community Action Executive Director.

C. Lobbying

Expenditures by the agency as a section 501(c)(3) public charity for lobbying activities are allowable under the Internal Revenue Code as long as they are not a substantial part of the agency's activities. However, no lobbying expenditures may be charged directly or indirectly to any Federal award.

Lobbying is defined as attempting to influence proposed or pending legislation by contacting, or urging the public to contact, members or employees of a legislative body for the purpose of proposing, supporting, or opposing legislation, or if the organization advocates the adoption or rejection of legislation.

D. Demonstrations

No individual employed by the agency shall, pursuant to or during the performance of services rendered in connection with any program or activity conducted or assisted by the agency plan, initiate, participate in, or otherwise aid or assist in the conduct of any unlawful demonstration, rioting, or civil disturbance.

E. Religious Activity

Agency funds may not be used to support inherently religious activities such as religious instruction, worship, or proselytization.

Confidentiality Policy - Personnel Policy | 12

The protection of confidential information is vital to the success of Community Action. Such confidential information includes, but is not limited to, the following examples: Participant information/files, Employee files, Medical Records, Drug and Alcohol Testing, and Child Abuse Reports.

Community Action will ensure that confidential and sensitive information collected during the course of operation is properly handled and safeguarded. Confidential information is to be used only in connection with the legitimate functions of an employee's job duties. Methods that will be used to safeguard confidential information concerning a child, family, client, or staff member include:

1. Requiring all staff, consultants and volunteers to abide by the program's standards of conduct, which outline strict confidentiality policies. Training and signature of agreement to abide by the standards of conduct and ethics is required.
2. Following the confidentiality provision under the Family Educational Rights and Privacy Act (FERPA), which protects the privacy of student records and the applicable provisions in Part, B or C of the Individuals with Disabilities Education Act (IDEA).
3. Preventing the improper dissemination of information about children and families by requiring information to and from agencies or outside individuals, concerning a child or family must contain a written or electronic release form signed by the client, parent or legal guardian.
4. Keeping confidential and sensitive information about children, families and staff in a secure location, which may include locked file cabinets, locked files rooms, or password protected electronic data and file systems.
5. Properly disposing of confidential records, as needed, in a secure manner that will include shredding of such information in accordance with the agency Record Retention policy.
6. Accessing electronic client data files must occur through secure data connections. Electronic client files are not to be downloaded onto personal computers or electronic devices that are not sanctioned and secured by the agency.
7. If an employee leaves, the employee must surrender all information-bearing items in their possession, whether or not containing confidential information, including but not limited to, storage media, notebooks, reports, and other information from a third party, or anything containing agency program confidential information.
8. Data Sharing: In accordance with applicable federal, Head Start Program Performance Standards (HSPPS), state, local laws, and Board policy, Community Action of Southeast Iowa will protect the privacy of child and family records, while managing program data to effectively support the availability, usability, integrity, and security of data. The Board and the Head Start Policy Council approves procedures on data management, including the effective use and sharing of data. Relevant data may be integrated and shared, to the extent practicable, with state education data systems, community health systems, or other early childhood systems, to provide reciprocal benefits and supports in assessing needs and building quality systems to support those needs.

CSBG Confidentiality Policy Training for Staff

1. CSBG staff, including all staff working at the Centers and having access to the Client Tracking system will receive confidentiality and ethics training.
2. Training will be provided by the FaDSS Coordinator prior to staff having unsupervised access to the Client tracking system. Currently the agency tracks clients in NIFCAP.
3. Certificates of the training will be provided as verification of training completion.

CSBG Code of Ethics

Preamble

The primary mission of the CSBG Family Development Program is to enhance the well-being and help meet the basic needs of all Participants. The worker must demonstrate the highest standards of personal integrity, truthfulness, honesty, and fortitude to inspire confidence and trust within the community. Staff are models of ethical behavior to the families and this code outlines those expectations and guidelines.

Purpose of the Code of Ethics

This Code of Ethics offers a set of values, principles, and standards to guide decision-making and ensure workers have knowledge of ethical conduct. It does not provide a set of rules that prescribe how the worker should act in all situations. Specific applications of the Code must take into account the context in which it is being considered and the possibility of conflicts among the Code's values, principles, and standards. Further, the Code does not specify which values, principles, and standards are most important and ought to outweigh others in instances when they conflict. When a worker has these conflicts they should consult their supervisor.

A code of ethics cannot guarantee ethical behavior. Moreover, a code of ethics cannot resolve all ethical issues or disputes or capture the richness and complexity involved in striving to make responsible choices within a moral community. Rather, a code of ethics sets forth values, ethical principles, and ethical standards to which professionals aspire and by which their actions can be judged.

Key Definitions

Family Development and Self-Sufficiency Program Staff

All staff providing direct family development services, staff that supervise them and those responsible for the daily operations of CSBG. Referred to as the "Worker" in the Code of Ethics.

Family Participant

A person or persons receiving services from an approved CSBG Grantee. Referred to as "family participant", "family member" or "family" in the Code of Ethics.

Records

All documentation related to our work with a family.

Relationship

Used to describe the professional, working relationship between the family participant and the worker.

Third Party

Person other than the family or the worker and not an employee of the CSBG Program.

Personnel Policies

These are guidelines that have been established by each individual Grantee's Administration and/or Board of Directors.

Program Philosophy

The philosophy of the CSBG program is that comprehensive, capacity-building, early intervention with at-risk families can be successful in improving stability and self-sufficiency. The primary objectives are to foster healthy, nurturing family environments and to strengthen the families' resources within the broader community. Support is provided in order to promote parental competencies and behaviors that will lead to healthy and positive personal development of parents and children.

1. Responsibility to CSBG Participants

1.1. Commitment to Families

The worker's primary responsibility is to promote the well-being of the families served. In general, participant's interests are primary. However, the worker's responsibility to the larger society or specific legal obligations may on limited occasions supersede the primary responsibility owed to family participants, and participants should be so advised. (Examples include when a worker is required by law to report that a family member has abused a child or has threatened to harm self or others. CSBG workers are mandatory child abuse reporters. Additionally, workers are required to cooperate with the Department of Inspections and Appeals in cases where welfare fraud may be suspected).

1.2. Self-Determination

The worker respects and promotes the right of families to self-determination and assists family members in their efforts to identify and clarify their goals and their chosen means to achieve them.

1.3. Informed Consent

There may be times when workers need to share information with other professionals regarding the families they are working with. Workers must use clear and understandable language to inform family members of the purpose of the services, the families' right to refuse or withdraw consent, and the time frame covered by the consent. CSBG Standard: Releases of Information are not to be for any longer than a period of one year and must be renewed, if warranted or needed. Family members must be provided with the opportunity to ask questions and receive a copy of the signed consent form.

In instances when family members are not literate or have difficulty understanding the primary language used, the worker must take steps to ensure the family member's comprehension of informed consent. This may include providing family members with a detailed verbal explanation or arranging for a qualified interpreter or translator.

Workers must obtain family member's written informed consent before audio taping, videotaping, or photographing families or permitting observation of services to families by a third party.

1.4. Competence

Workers must provide services and may represent themselves as competent only within the boundaries of their education, training, license, certification, consultation received, supervised experience, or other relevant professional experience and within the boundaries of their current position.

1.5. Cultural Competence and Social Diversity

Workers must understand culture and its functions in human behavior and society, recognizing that all cultures have strengths.

Workers must have a knowledge base of the families they work with and be able to demonstrate competence in the provision of services that are sensitive to families' cultures as well as to the differences between people and cultural groups.

Workers must obtain and continue education about and seek to understand the nature of social diversity and oppression with respect to race, ethnicity, national origin, color, sex, sexual orientation, gender identity or expression, age, marital status, political belief, religion, immigration status, and mental or physical disability.

1.6. Conflicts of Interest

Workers must be alert to and avoid conflicts of interest that interfere with the exercise of professional discretion and impartial judgment. Workers must consult supervisors and inform families when a real or potential conflict of interest arises and take reasonable steps to resolve the issue in a manner that makes the family's interests primary and protects the family's interests to the greatest extent possible. In some cases, protecting the family's interests may require termination of the professional relationship.

Workers must not take unfair advantage of any professional relationship or exploit others to further their personal, religious, political, or business interests.

Workers must not engage in dual or multiple relationships with current or former participant family members. In instances when dual or multiple relationships are unavoidable, workers should take steps to protect family members and are responsible for setting clear, appropriate, and culturally sensitive boundaries. (Dual or multiple relationships occur when workers relate to family members in more than one relationship, whether professional, social, or business. Dual or multiple relationships can occur simultaneously or consecutively.)

When workers provide services to two or more people who have a relationship with each other (for example, couples, family members), workers should clarify with all parties the nature of their professional obligations to the various individuals who are receiving services. Workers who anticipate a conflict of interest among the individuals receiving services or who anticipate having to perform in potentially conflicting roles (for example, when a worker is asked to testify in a child custody dispute or divorce proceeding) must clarify their role with the parties involved and take appropriate action to minimize any conflict of interest.

1.7. Privacy and Confidentiality

Workers must respect all families' rights to privacy. Workers must not solicit private information from family participants unless it is essential to providing services or conducting an evaluation or research. Once private information is shared, standards of confidentiality apply.

Workers may disclose specific, confidential information when appropriate with valid, written consent from the family participant.

Workers must protect the confidentiality of all information obtained in the course of professional service, except for compelling professional reasons. The general expectation that workers will keep information confidential does not apply in cases when disclosure is necessary to prevent serious, foreseeable, and imminent harm to a family member or other identifiable person or when laws or regulations require disclosure without a family's consent. In all instances, workers should disclose the least amount of confidential information necessary to achieve the desired purpose; only information that is directly relevant to the purpose for which the disclosure is made should be revealed.

Workers must inform families, to the extent possible, about the disclosure of confidential information and the potential consequences, when feasible, before the disclosure is made. This applies whether workers disclose confidential information on the basis of a legal requirement or family consent.

Workers must discuss with families and other interested parties the nature of confidentiality and limitations of families' rights to confidentiality. The worker must review with families' circumstances where confidential information may be requested and where disclosure of confidential information may be legally required. This discussion should occur as soon as possible in the relationship and as needed throughout the course of the relationship.

Workers must not discuss confidential information in any setting unless privacy can be ensured. Workers must not discuss confidential information in public or semi-public areas such as hallways, waiting rooms, elevators or restaurants. Workers should take precautions to ensure and maintain the confidentiality of information transmitted to other parties through the use of computers, electronic mail, facsimile machines, telephones and telephone answering machines, and other electronic or computer technology. Disclosure of identifying information should be avoided whenever possible.

Workers must protect the confidentiality of family members during legal proceedings to the extent permitted by the law.

Workers must protect the confidentiality of families' written and electronic records and other sensitive information. Workers must take reasonable steps to ensure that families' records are stored in a secure location and are only available to persons who are authorized to have access to such records.

Workers must not disclose identifying information when discussing families for teaching or training purposes, unless the family has consented to the disclosure of such confidential information.

Workers must protect the confidentiality of deceased members of families consistent with the preceding standards.

1.8. Access to Records

Workers must provide family members with reasonable access to the records concerning their family. Families who wish to examine their records or want to request copies may contact their worker and schedule a time during normal business hours. A CSBG staff member must be present during the examination.

1.9. Physical Contact

Workers must not engage in physical contact with a family member when there is a possibility of psychological harm to the family member as a result of the contact (such as cradling or caressing family members.) Workers are responsible for setting clear, appropriate, and culturally sensitive boundaries that govern such physical contact. Workers must ask for permission prior to engaging in each incident of physical contact with a family member.

1.10. Derogatory Language

Workers must not use derogatory language in their written or verbal communications to or about families. Workers must use accurate and respectful language in all communications to and about families.

1.11. Sexual Harassment

Workers must not sexually harass family members. Sexual harassment includes sexual advances, sexual solicitation, requests for sexual favors and other verbal or physical conduct of a sexual nature.

1.12. Sexual Relationships

Workers must under no circumstances initiate or engage in sexual activities or sexual contact with current family members.

Workers must not engage in sexual activities or sexual contact with the family's relatives or other individuals with whom the family maintains a close personal relationship when there is a risk of exploitation or potential harm to the family. Sexual activity or sexual contact with the family's relatives or other individuals with whom the family maintains a personal relationship has the potential to be harmful to the family and may make it difficult for the worker and family to maintain appropriate professional boundaries. Workers -- not their families, their families' relatives, or other individuals with whom the family maintains a personal relationship -- assume the full burden for setting clear, appropriate, and culturally sensitive boundaries.

Workers must not initiate or engage in sexual activities or sexual contact with former participant family members because of the potential for harm to the family. If the worker engages in conduct contrary to this prohibition or claim that an exception to this prohibition is warranted because of extraordinary circumstances, it is the worker -- not the family participant -- who assumes the full burden of demonstrating that the former participant family has not been exploited, coerced, nor manipulated, intentionally or unintentionally.

Workers must not provide services to individuals with whom they have had a prior sexual relationship. Providing services to a former sexual partner has the potential to be harmful to the individual and is

likely to make it difficult for the worker and the individual to maintain appropriate professional boundaries.

1.13. Interruption of Services

Workers must make reasonable efforts to ensure continuity of services in the event that services are interrupted by factors such as unavailability, relocation, illness, disability, or death.

1.14. Termination of Services

Workers should terminate services to families and professional relationships with them when such services and relationships are no longer required or no longer serve the families' needs or interests.

Workers should not terminate services to pursue a social, financial, or sexual relationship with a family member.

Workers should anticipate the termination or interruption of services to families and must notify families promptly.

2. Inter-professional relationships

2.1. Respect

Workers must treat colleagues with respect.

Workers must avoid unwarranted negative criticism of colleagues in communications with families or with other professionals.

2.2. Confidentiality

Workers must respect confidential information shared by colleagues in the course of their professional relationships and transactions.

2.3. Interdisciplinary Collaboration

Workers for whom a team decision raises ethical concerns must attempt to resolve the disagreement through the appropriate channels as outlined in the agency personnel policies.

2.4. Disputes Involving Colleagues

Workers must not exploit families in disputes with colleagues or engage families in any inappropriate discussion of conflicts between workers and their colleagues.

2.5. Consultation

Workers should seek the advice and counsel of colleagues whenever such consultation is in the best interest of the family.

When consulting with colleagues about families, workers should disclose the least amount of information necessary to achieve the purposes of the consultation.

2.6. *Impairment of Colleagues*

Workers who have direct knowledge of a worker's impairment that is due to personal problems, psychosocial distress, substance abuse, or mental health difficulties and that interferes with practice effectiveness should follow personnel policies to deal with this.

Workers who believe that a colleague's impairment interferes with practice effectiveness and that the colleague has not taken adequate steps to address the impairment should take action through appropriate channels established by the agency.

2.7. *Incompetence of Colleagues*

Workers who have direct knowledge of a colleague's incompetence should follow personnel policies to deal with this.

Workers who believe that a colleague is incompetent and has not taken adequate steps to address the incompetence should take action through appropriate channels established by the agency.

2.8. *Unethical Conduct of Colleagues*

Workers should take measures as established by agency policy to discourage, prevent, expose and correct the unethical conduct of colleagues.

Workers who believe that a colleague has acted unethically should seek resolution through the appropriate channels established by the agency.

3. *Family Records*

Workers must take reasonable steps to ensure that documentation in records is accurate and reflects the services provided in accordance with contractual issues.

Workers must include sufficient and timely documentation in records to facilitate the delivery of services and to ensure continuity of services provided to families in the future.

The worker's documentation must protect the family's privacy to the fullest extent possible and should include only information that is directly relevant to the delivery of services.

Workers must store records following the termination of services to families to ensure reasonable future access. Records must be maintained for the length of time outlined in the CSBG contract.

Records both current and closed must be kept secure in a locked storage area or password protected for electronic files.

Workers must provide families with reasonable access to the records concerning their family. Family members who wish to examine their records or want to request copies may contact their worker and schedule a time during normal business hours to do so. A CSBG staff member must be present during the examination.

Documentation in family records should not be changed after it has been entered into the family file. If there is a dispute with the records, the worker should follow the appropriate agency procedures.

4. Professional Competence and Integrity

4.1. Private Conduct

Workers must not permit their private conduct outside of their job to interfere with their ability to fulfill their professional responsibilities.

4.2. Dishonesty, Fraud, and Deception

Workers must not participate in dishonesty, fraud, or deception.

4.3. Impairment

Workers should not allow their own personal problems, psychosocial distress, legal problems, substance abuse, or mental health difficulties to interfere with their professional judgment and performance nor to jeopardize the best interests of people for whom they have a professional responsibility.

Workers whose personal problems, psychosocial distress, legal problems, substance abuse, or mental health difficulties interfere with their professional judgment and performance should immediately seek consultation and take appropriate remedial action by seeking professional help, making adjustments in workload, terminating practice, or taking any other steps necessary to protect families and others.

5. Responsibility to Society

In promoting the general welfare of society, the worker must act to expand choice and opportunities for all persons.

The worker must demonstrate the highest standards of personal integrity, truthfulness, honesty, and fortitude in the CSBG program in order to inspire confidence and trust within the community.

The worker must act to prevent and eliminate discrimination against any person or group on the basis of race, color, sex, sexual orientation, age, religion, national origin, marital status, political belief, mental or physical handicap, or any other preference of personal characteristic, condition or status.

The worker must promote conditions that encourage respect for the diversity of cultures.

The worker must be strength-based when advocating for change in policy and legislation to improve social conditions and to promote social justice. Workers, during their work hours, must follow agency personnel policies and contractual agreements when advocating for change.

6. Responsibility to Research And Publicity

The worker needs to follow agency policies in regards to contact with the media and to participate in research. While the worker will cooperate with research and publicity, the ultimate aim will be to preserve family dignity and integrity.

When participants volunteer to be involved in media and/or public forums, the worker will attempt to maximize the families' privacy and dignity.

When supplying information to the public, the worker will help participants understand that misrepresentations may occur.

By signing below, I agree to act and conduct my work in the CSBG program in accordance with the content of this Code of Ethics.

CSBG Staff Signature

Date

Witness

Date

Participant Grievance Procedure

If a potential participant or a participant of a program, which Community Action of Southeast Iowa operates, has a grievance, the following steps should be taken to address the concern:

1. The participant should speak directly with the person involved with the concern at the local level and try to resolve the concern.
2. If this does not resolve the conflict, the participant may put the concern in writing and submit it to the Program Director. The following details should be included:
 - The date and location of the incident.
 - An explanation of the specific incident.
 - A list of all individuals involved in the incident.
 - A brief summary of the attempt made to resolve the incident.
3. If the conflict involves an allegation of discrimination, the concern will be submitted to the Equal Employment Opportunity/Affirmative Action Officer and the Executive Director by the Program Director. The process will then proceed to step 5 and be handled by the Executive Director.
4. The Program Director will meet with the person involved to resolve the concern within five working days. This decision will be put in writing to the persons involved within five working days of the meeting and will include information on the right to appeal the decision.
5. If the participant is not satisfied with the decision, he or she may send a written appeal to the Program Director and Community Action's Executive Director, who will meet with all parties involved within five working days of receiving the appeal and make a decision on the grievance. The written decision will be made within five working days of the meeting.

If the participant is with the Head Start or Early Head Start program and the decision is not satisfactory, he or she may submit a written appeal to the Policy Council within five working days of the decision. The Policy Council will review the appeal at the next regularly scheduled meeting and prepare a written decision within five working days.
6. If that decision is not satisfactory, the next step is to take the grievance to the Community Action Board of Directors. Members of the Board will meet with those involved within 10 working days to hear the grievance and issue their decision within 5 working days.
7. If the decision of the Board is not satisfactory to the participant, the final step is for the participant to pursue their rights outside of the agency. Information concerning the program funding source or state office involved with the program will be provided in writing to the participant such as the Iowa Division of Community Action Agencies, Head Start Office or Civil Rights Commission.

EO: February 1997; January 2005; September 2007; September 2012; February 2015

Participant Grievance Appeal Form

Community Action of Southeast Iowa is committed to providing equal opportunity in employment and program participation for all people without regard to race, color, creed, national origin, religion, pregnancy, sex, gender identity, sexual orientation, age, physical or mental disability, genetic information, veteran's status, uniformed service, or any other characteristic protected by federal, state or local law.

You have a right to appeal a decision made regarding your grievance. Please follow the guidelines laid out in the Participant Grievance Procedure which lists instructions and timelines.

You may complete and submit this form or include the applicable information and submit it in writing.

Name of person submitting the appeal _____

Phone _____

Email _____

Address _____

City/State/Zip _____

Date of incident _____

Location of incident _____

Explanation of incident _____

Brief summary of attempt(s) made to resolve the incident _____

Please see Participant Grievance Procedure for the appropriate person to whom to submit your appeal.

Submitted to: _____ on (date): _____

Submitted to: _____ on (date): _____

Further Information

If you would like clarification on any of the above please notify the Center Director, Planning Director, or Executive Director.

You may also view the Personnel Policies and Safety Handbook for more information.

Central Office: 2850 Mt Pleasant Street Suite 108, Burlington, IA 52601

319-753-0193 community.action@caofseia.org