

The Harris Center for Mental Health and IDD  
9401 Southwest Freeway Houston, TX 77074  
Board Room #109

Governance Committee Meeting  
June 17, 2025  
8:30 am

**I. DECLARATION OF QUORUM**

**II. PUBLIC COMMENTS**

**III. APPROVAL OF MINUTES**

- A. Approve Minutes of the Board of Trustees Meeting Held on Tuesday,  
May 20, 2025  
(EXHIBIT G-1)

**IV. REVIEW AND TAKE ACTION**

A. No Changes

1. Closed Record Review Committee Policy  
(EXHIBIT G-2)
2. Inquiries on Employees Policy  
(EXHIBIT G-3)
3. Lactation Breaks Policy  
(EXHIBIT G-4)

B. Policy Changes

1. Code of Ethics Policy  
(EXHIBIT G-5)

**V. EXECUTIVE SESSION**

- As authorized by §551.071 of the Texas Government Code,  
the Board of Trustees reserves the right to adjourn into  
Executive Session at anytime during the course of this meeting  
to seek legal advice from its attorney about any matters listed  
on the agenda.

**VI. RECONVENE INTO OPEN SESSION**

**VII. CONSIDER AND TAKE ACTION AS A RESULT OF THE EXECUTIVE  
SESSION**

**VIII. ADJOURN**



Veronica Franco, Board Liaison  
Jim Lykes, Chairman  
Governance Committee  
The Harris Center for Mental Health and IDD



# **EXHIBIT G-1**

**BOARD OF TRUSTEES  
THE HARRIS CENTER *for*  
MENTAL HEALTH AND IDD  
GOVERNANCE COMMITTEE MEETING  
TUESDAY, MAY 20, 2025  
MINUTES**

**CALL TO ORDER**

Mr. Jim Lykes, Chairman called the meeting to order at 8:31 a.m. in Conference Room 109, 9401 Southwest Freeway, noting a quorum of the Committee was present.

**RECORD OF ATTENDANCE**

Committee Members in Attendance: Mr. J. Lykes, Mr. G. Womack

Committee Member Absent: Mrs. N. Hurtado

Other Board Member Present: Dr. R. Gearing, Dr. K. Bacon, Dr. M. Miller, Jr.,  
Dr. J. Lankford, Ms. R. Thomas-videoconference

**1. DESIGNATION OF BOARD MEMBERS AS VOTING COMMITTEE MEMBERS**

Mr. J. Lykes designated Dr. K. Bacon, Dr. M. Miller, Jr., Dr. J. Lankford and Ms. R. Thomas as voting members of the committee.

**2. DECLARATION OF QUORUM**

The meeting was called to order at 8:31 a.m.

**3. PUBLIC COMMENTS**

No public comments.

**4. APPROVAL OF MINUTES**

Minutes of the Board of Trustees Governance Committee meeting held on Tuesday, March 18, 2025

**MOTION: LANKFORD    SECOND: MILLER, JR.  
The Motion passed with unanimous affirmative votes**

**BE IT RESOLVED**, Minutes of the Board of Trustees Governance Committee meeting held on Tuesday, March 18, 2025, EXHIBIT G-1 has been approved and recommended to the Full Board.

**5. REVIEW AND COMMENT**

**A. Employee Labor Organization Presentation**-Alma Castillo, Brian Kelley and Seth Hutchinson presented information related to the benefits of just cause employment and a pay raise for all staff to the Governance Committee.

## 6. REVIEW AND TAKE ACTION

### A. No Changes

1. Agency Abbreviations (Exhibit G-3)
2. Breach Notification (Exhibit G-4)
3. Clinical Peer Review (Exhibit G-5)
4. Consents and Authorizations (Exhibit G-6)
5. Content of Patient/Individual Records (Exhibit G-7)
6. Credentialing Policy (Exhibit G-8)
7. Delegation and Supervision of Certain Nursing Acts (Exhibit G-9)
8. Delegations in the Absence of the Chief Executive Officer (Exhibit G-10)
9. Dental Services for Intermediate Care Facilities for IDD (ICF-IID) (Exhibit G-11)
10. Emergency Medical Care for Consumers, Employees and Volunteers (Exhibit G-12)
11. Infection Control and Prevention Policy (Exhibit G-13)
12. Intellectual and Development Disabilities Division (Exhibit G-14)
13. Licensure, Certification, and Registration (Exhibit G-15)
14. Linguistic Competence Services (Exhibit G-16)
15. Medical Services (Exhibit G-17)
16. Nursing Peer Review: Incident Based or Safe Harbor (Exhibit G-18)
17. Nurse Staffing Advisory Committee (Exhibit G-19)
18. Obligation to Identify Individuals or Entities Excluded from Participation in Federal Health Care Programs (Exhibit G-20)
19. Overtime Compensation (Exhibit G-21)
20. Referral, Transition and Discharge (Exhibit G-22)
21. Solicitation of/and Acceptance of Donations (Money, Goods, or Services (Exhibit G-23)
22. Standardized Patient Record Form (Exhibit G-24)
23. State Service Contract Monitoring and Performance Reporting (Exhibit G-25)
24. Telehealth & Telemedicine Services (Exhibit G-26)
25. Utilization of Security Officer Services (Exhibit G-27)
26. Weapons (Exhibit G-28)
27. Work Force Reduction (Exhibit G-29)

**MOTION:** BACON moved to approve agenda Exhibits G3-G29

**SECOND:** LANKFORD moved to approve agenda Exhibits G3-G29

**BE IT RESOLVED, with unanimous affirmative vote, agenda Exhibits G3-G29 are approved and recommended to Full Board for final approval.**

### B. New Policies

1. Meal Period and Break Policy

**MOTION: MILLER, JR.**

**SECOND: BACON**

**The Motion passed with unanimous affirmative votes**

**BE IT RESOLVED**, Meal Period and Break Policy, EXHIBIT G-30 with the noted correction has been approved and recommended to the Full Board.

2. Nursing Services Policy

**MOTION: GEARING SECOND: LANKFORD**

**The Motion passed with unanimous affirmative votes**

**BE IT RESOLVED**, Nursing Services Policy, EXHIBIT G-31 with the noted correction has been approved and recommended to the Full Board.

3. Overtime Management Policy

**MOTION: LANKFORD SECOND: MILLER, JR.**

**The Motion passed with unanimous affirmative votes**

**BE IT RESOLVED**, Overtime Management Policy, EXHIBIT G-32 has been approved and recommended to the Full Board.

4. Pharmacy After Hours Service Policy

**MOTION: LANKFORD SECOND: MILLER, JR.**

**The Motion passed with unanimous affirmative votes**

**BE IT RESOLVED**, Pharmacy After Hours Service Policy, EXHIBIT G-33 has been approved and recommended to the Full Board.

5. Pharmacy Dispensary of Hope (DOH) Program Policy

**MOTION: LANKFORD SECOND: BACON**

**The Motion passed with unanimous affirmative votes**

**BE IT RESOLVED**, Pharmacy Dispensary of Hope (DOH) Program Policy, EXHIBIT G-34 has been approved and recommended to the Full Board.

6. Pharmacy Personal Safety Policy

**MOTION: BACON SECOND: GEARING**

**The Motion passed with unanimous affirmative votes**

**BE IT RESOLVED**, Pharmacy Personal Safety Policy, EXHIBIT G-35 has been approved and recommended to the Full Board.

7. Pharmacy Prescription Dispensing and Counseling Policy

**MOTION: GEARING SECOND: MILLER, JR.**

**The Motion passed with unanimous affirmative votes**

**BE IT RESOLVED**, Pharmacy Prescription Dispensing and Counseling Policy, EXHIBIT G-36 has been approved and recommended to the Full Board.

8. Pharmacy Third Party Insurance Billing Policy

**MOTION: MILLER, JR. SECOND: LANKFORD**  
**The Motion passed with unanimous affirmative votes**

**BE IT RESOLVED**, Pharmacy Third Party Insurance Billing Policy, EXHIBIT G-37 has been approved and recommended to the Full Board.

9. Search Warrant Policy

**MOTION: GEARING SECOND: BACON**  
**The Motion passed with unanimous affirmative votes**

**BE IT RESOLVED**, Search Warrant Policy, EXHIBIT G-38 has been approved with the Committee's recommendation to revise the policy to clarify "search warrant related requests or investigations" and recommended to the Full Board.

10. Voting-Time Off

**MOTION: WOMACK SECOND: BACON**  
**The Motion passed with unanimous affirmative votes**

**BE IT RESOLVED**, Voting-Time Off Policy, EXHIBIT G-39 has been approved and recommended to the Full Board.

C. Changes

1. Burglaries or Thefts

**MOTION: MILLER, JR. SECOND: LANKFORD**  
**The Motion passed with unanimous affirmative votes**

**BE IT RESOLVED**, Burglaries or Thefts Policy, EXHIBIT G-40 has been approved and recommended to the Full Board.

2. Compliance Plan FY25

**MOTION: WOMACK SECOND: LANKFORD**  
**The Motion passed with unanimous affirmative votes**

**BE IT RESOLVED**, Compliance Plan FY25, EXHIBIT G-41 has been approved and recommended to the Full Board.

3. Criminal History Clearances

**MOTION: GEARING      SECOND: MILLER, JR.**  
**The Motion passed with unanimous affirmative votes**

**BE IT RESOLVED**, Criminal History Clearances, EXHIBIT G-42 has been approved and recommended to the Full Board.

4. Incident Reporting

**MOTION: WOMACK      SECOND: BACON**  
**The Motion passed with unanimous affirmative votes**

**BE IT RESOLVED**, Incident Reporting, EXHIBIT G-43 has been approved and recommended to the Full Board.

5. Medication Storage, Preparation and Administration Areas Policy

**MOTION: GEARING      SECOND: BACON**  
**The Motion passed with unanimous affirmative votes**

**BE IT RESOLVED**, Medication Storage, Preparation and Administration Areas Policy, EXHIBIT G-44 has been approved and recommended to the Full Board.

6. Patient/Individual Access to Medical Records

**MOTION: GEARING      SECOND: BACON**  
**The Motion passed with unanimous affirmative votes**

**BE IT RESOLVED**, Patient/Individual Access to Medical Records, EXHIBIT G-45 has been approved and recommended to the Full Board.

7. Petty Cash

**MOTION: GEARING      SECOND: BACON**  
**The Motion passed with unanimous affirmative votes**

**BE IT RESOLVED**, Petty Cash, EXHIBIT G-46 has been approved and recommended to the Full Board.

8. Pharmacy and Therapeutics Committee Policy

**MOTION: GEARING      SECOND: LANKFORD**  
**The Motion passed with unanimous affirmative votes**

**BE IT RESOLVED**, Pharmacy and Therapeutics Committee Policy, EXHIBIT G-47 has been approved and recommended to the Full Board.

9. Pharmacy Medication Destruction Policy

**MOTION: GEARING      SECOND: LANKFORD**  
**The Motion passed with unanimous affirmative votes**

**BE IT RESOLVED**, Pharmacy Medication Destruction Policy, EXHIBIT G-48 has been approved and recommended to the Full Board.

10. Pharmacy Peer Review Policy

**MOTION: GEARING      SECOND: LANKFORD**  
**The Motion passed with unanimous affirmative votes**

**BE IT RESOLVED**, Pharmacy Peer Review Policy, EXHIBIT G-49 has been approved and recommended to the Full Board.

11. Pharmacy Staff Training Policy

**MOTION: MILLER, JR.      SECOND: LANKFORD**  
**The Motion passed with unanimous affirmative votes**

**BE IT RESOLVED**, Pharmacy Staff Training Policy, EXHIBIT G-50 has been approved and recommended to the Full Board.

12. Physician Assistant, Advanced Practice Registered Nurse, Pharmacist  
 Delegation

**MOTION: GEARING      SECOND: LANKFORD**  
**The Motion passed with unanimous affirmative votes**

**BE IT RESOLVED**, Physician Assistant, Advanced Practice Registered Nurse, Pharmacist Delegation, EXHIBIT G-51 has been approved along with the recommendation to include Nursing leadership in the approval process and recommended to the Full Board.

13. Physician Authority to Delegate Certain Medical Acts

**MOTION: GEARING      SECOND: WOMACK**  
**The Motion passed with unanimous affirmative votes**

**BE IT RESOLVED**, Physician Authority to Delegate Certain Medical Acts, EXHIBIT G-52 has been approved and recommended to the Full Board.

14. Privacy Officer

**MOTION: WOMACK      SECOND: MILLER, JR.**  
**The Motion passed with unanimous affirmative votes**

**BE IT RESOLVED**, Privacy Officer, EXHIBIT G-53 has been approved and recommended to the Full Board.

15. Out of State Employment

**MOTION: WOMACK SECOND: LANKFORD**

**The Motion passed with unanimous affirmative votes**

**BE IT RESOLVED**, Out of State Employment, EXHIBIT G-54 has been approved and recommended to the Full Board.

16. Qualified Intellectual Disabilities Professional (QIDP) Policy

**MOTION: WOMACK SECOND: LANKFORD**

**The Motion passed with unanimous affirmative votes**

**BE IT RESOLVED**, Qualified Intellectual Disabilities Professional, EXHIBIT G-55 has been approved and recommended to the Full Board.

17. Security of Patient/Individual Identifying Information

**MOTION: WOMACK SECOND: MILLER, JR.**

**The Motion passed with unanimous affirmative votes**

**BE IT RESOLVED**, Security of Patient/Individual Identifying Information, EXHIBIT G-56 has been approved and recommended to the Full Board.

18. Social Media Use

**MOTION: GEARING SECOND: BACON**

**The Motion passed with unanimous affirmative votes**

**BE IT RESOLVED**, Social Media Use, EXHIBIT G-57 has been approved and recommended to the Full Board.

19. Third Party Participation in Patient Services

**MOTION: GEARING SECOND: BACON**

**The Motion passed with unanimous affirmative votes**

**BE IT RESOLVED**, Third Party Participation in Patient Services, EXHIBIT G-58 has been approved and recommended to the Full Board.

20. Time and Attendance

**MOTION: GEARING SECOND: MILLER, JR.**

**The Motion passed with unanimous affirmative votes**

**BE IT RESOLVED**, Time and Attendance, EXHIBIT G-59 has been approved and recommended to the Full Board.

21. Trauma-Informed Practice

**MOTION: BACON            SECOND: LANKFORD**  
**The Motion passed with unanimous affirmative votes**

**BE IT RESOLVED**, Trauma-Informed Practice, EXHIBIT G-60 has been approved and recommended to the Full Board.

**7. EXECUTIVE SESSION** –Entered in Executive Session at 8:42am

- As authorized by §551.071 of the Texas Government Code, the Board of Trustees reserves the right to adjourn into Executive Session at anytime during the course of this meeting to seek legal advice from its attorney about any matters listed on the agenda.

**8. RECONVENED INTO OPEN SESSION** – 8:52am

**9. CONSIDER AND TAKE ACTION AS A RESULT OF THE EXECUTIVE SESSION**

**10. ADJOURN**

**MOTION: BACON            SECOND: WOMACK**  
The meeting was adjourned at 9:18 A.M.

Respectfully submitted,

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**Veronica Franco, Board Liaison**  
**Jim Lykes, Chairman**  
**Governance Committee**  
**THE HARRIS CENTER for Mental Health and IDD**  
**Board of Trustees**

# **EXHIBIT G-2**

Status **Pending** PolicyStat ID **18120848**



Origination 04/2008  
 Last Approved N/A  
 Effective Upon Approval  
 Last Revised 06/2023  
 Next Review 1 year after approval

Owner Gertrude Leidich:  
 Vice President  
 Clinical Transformation  
 and Quality  
 Area Medical Services  
 Document Type Agency Policy

## MED.A.8 - Closed Record Review Committee Policy

### 1. PURPOSE:

To provide clinical peer review of all deaths of The Harris Center's consumers to ensure against inappropriate clinical care, and one that conforms to the highest quality standard of care and the Harris Center's policies and procedures.

### 2. POLICY:

It is the policy of the Harris Center to ensure that the deaths of all consumers served in all Harris Center programs, including contracted placements, are peer-reviewed. All contract providers are responsible for adhering to the provisions of this policy and procedures.

The Harris Center's Closed Record Review Committee is responsible for the clinical peer review of all consumer deaths and making recommendations to the Chief Medical Officer for the improvement of The Harris Center's service delivery system. The Closed Record Review Committee is a subcommittee of the Professional Review Committee (PRC).

### 3. APPLICABILITY/SCOPE:

This policy applies to all staff employed by The Harris Center including, direct and contracted employees.

### 4. RELATED POLICIES/FORMS (for reference only):

[Incident Reporting](#)

## 5. PROCEDURES:

Closed Record Review Committee

## 6. REFERENCES: RULES/REGULATIONS/ STANDARDS:

Deaths of Individuals Served by Community Mental Health Centers. Title 25. TEX. ADMIN. CODE. Chapter 405. Subchapter K.

### Approval Signatures

Step Description	Approver	Date
Management of Board Approval	Christopher Webb: Audit	Pending
CEO Approval	Wayne Young: Exec	06/2025
Final Legal Review	Kendra Thomas: Counsel	05/2025
2nd Department Review	Luming Li: Chief Medical Ofcr (1101 1817)	05/2025
1st Department Review	Danyalle Evans	05/2025
Initial Assignment	Gertrude Leidich: Vice President Clinical Transformation and Quality	05/2025

# **EXHIBIT G-3**

Status **Pending** PolicyStat ID **18115604**



Origination 03/2000

Last Approved N/A

Effective Upon Approval

Last Revised 07/2024

Next Review 1 year after approval

Owner Toby Hicks

Area Human Resources

Document Type Agency Policy

## HR.A.11 Inquiries on Employees

### 1. PURPOSE:

The Harris Center for Mental Health and Intellectual and Developmental Disability (The Harris Center) has a responsibility to maintain a system to protect current and former employees' employment records. The purpose of this policy is to ensure a consistent process throughout the agency concerning the release of employment information.

### 2. POLICY:

All inquiries regarding the employment information of current and former employees will be referred to an approved third-party vendor for official responses. In the event the third-party vendor is unable to provide the necessary documentation, then the inquiry will be sent to the Human Resources Department for completion. These inquiries include, but are not limited to, reference checks on current or past employment, working hours, salary verifications, credit and collection inquiries, requests pertaining to any solicitation of employees or distribution of material to employees, and all other requests for information that may be part of an employee's employment record. This list is illustrative only and not exhaustive.

### 3. APPLICABILITY/SCOPE:

This policy applies to all staff employed by The Harris Center including, both direct and contracted employees.

## 4. RELATED POLICIES/FORMS:

[HIM.IT.A.2 Information Security Policy](#)

## 5. PROCEDURES:

## 6. REFERENCES: RULES/REGULATIONS/STANDARDS:

- The Harris Center's Policy and Procedure Handbook
- Restrictions on Blacklisting, Texas Labor Code §52.031
- Disclosure by Employer of Information Regarding Certain Employees or Former Employees, Texas Labor Code §103
- Texas Public Information Act, Texas Government Code § 552

### Approval Signatures

Step Description	Approver	Date
Management of Board Approval	Christopher Webb: Audit	Pending
CEO Approval	Wayne Young: Exec	06/2025
2nd Legal Review	Kendra Thomas: Counsel	06/2025
1st Legal Review	Bijul Enaohwo	05/2025
Department Review	Kendra Thomas: Counsel	05/2025
Initial Assignment	Toby Hicks	05/2025

# **EXHIBIT G-4**

Status **Pending** PolicyStat ID **18115589**



Origination 06/2020

Last Approved N/A

Effective Upon Approval

Last Revised 06/2023

Next Review 1 year after approval

Owner Toby Hicks

Area Human Resources

Document Type Agency Policy

## HR.A.13 Lactation Breaks

### 1. PURPOSE:

To ensure employees at The Harris Center for Mental Health and IDD (The Harris Center) have reasonable breaks to express breast milk at the workplace.

### 2. POLICY:

The Harris Center supports the right of nursing employees to receive break time to express breast milk and a private place, other than the bathroom, to pump at work. Under this policy, nursing employees may take reasonable breaks to express breast milk for up to one year following the birth of the employee's child each time such employee has a need to express breast milk. Employees who telecommute are eligible to take reasonable breaks to express breast milk like other employees.

Employees are encouraged to provide notice to their supervisor of their intent to take lactation breaks. The advance notice will give The Harris Center the time needed to create or designate the required space if the work location does not maintain a permanent space dedicated for use as a lactation room.

The space provided for use to express breast milk will be a quiet place, not a bathroom (even if private), and is shielded from view and free from intrusion from coworkers and the public. The room will be fitted with an electrical outlet for employees who use a pump that must be plugged in. The employee will have access to a clean, safe water source and a sink for washing hands and rinsing out any needed breast-pumping equipment. Employees who telecommute will also be free from observation by any Harris Center provided or required video system, including a computer camera, security camera, or web conferencing platform.

The employee will have access to cool refrigeration for storage of the employee-expressed breast milk.

Employees storing milk in the refrigerator assume all responsibility for the safety of the milk and the risk of harm for any reason, including improper storage, refrigeration, and tampering. If the employee decides to store the milk in their own cooler, they may do so, and the Harris Center will provide a space to store the cooler and their supplies.

Employees are encouraged to reserve the lactation room at their respective program locations with their supervisor. The supervisor will share the information only on an as-needed basis, such as with facilities personnel who may be charged with creating the required space. When an employee is using break time at work to express breast milk, they either must be completely relieved from duty or must be paid for the break time. Employees who are provided paid breaks and use such break times to express breast milk shall be compensated in the same way that other employees are compensated for their break time.

The Harris Center may not suspend, discipline, intimidate, retaliate, or terminate the employment of, or otherwise discriminate, against an employee for requesting or taking lactation breaks or for filing a complaint for violation of this policy. If an employee feels they are subject to any conduct that they believe violates this policy, they should promptly contact the Human Resources Department.

The Human Resource Department is responsible for the administration of this policy. They will ensure that a prompt investigation is conducted and take prompt corrective action, if appropriate.

### **3. APPLICABILITY/SCOPE:**

All The Harris Center employees.

### **4. RELATED POLICIES/FORMS:**

### **5. PROCEDURES:**

### **6. REFERENCES: RULES/REGULATIONS/STANDARDS:**

- Fair Labor Standards Act of 1938, 29 U.S.C. §207(r)
- Title VII of the Civil Rights Act of 1964 as amended by the Pregnancy Discrimination Act of 1978, 42 U.S.C. §2000e
- Right to Express Breast Milk in the Workplace, Texas Government Code Chapter 619
- H.R.3110 - Pump for Nursing Mothers Act. 117th Congress (2021-2022)

## **Approval Signatures**

**Step Description**

**Approver**

**Date**

Management of Board Approval	Christopher Webb: Audit	Pending
CEO Approval	Wayne Young: Exec	05/2025
2nd Legal Review	Kendra Thomas: Counsel	05/2025
1st Legal Review	Bijul Enahwo	05/2025
Department Review	Kendra Thomas: Counsel	05/2025
Initial Assignment	Toby Hicks	05/2025

# **EXHIBIT G-5**

Status **Pending** PolicyStat ID **18059653**



Origination 09/2021

Last Approved N/A

Effective

Upon Approval

Last Revised 04/2025

Next Review 1 year after approval

Owner Wayne Young:  
Exec

Area Leadership

Document Type Agency Policy

## LD.A.13 - Code of Ethics Policy

### 1. PURPOSE:

The Harris Center for Mental Health and IDD ("The Center") requires its directors, officers, employees and contractors to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of The Center, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

All Harris Center Board of Trustees, employees, interns, volunteers and contractors.

### 2. POLICY:

The purpose of the Code of Ethics policy (the "Policy") is to increase awareness of potential conflicts of interest and to ensure that all Board of Trustees and personnel always demonstrate and adhere to the highest standards of ethical and professional conduct. The Policy is to ensure that the actions of all personnel reflect a competent, respectful, and professional approach when serving consumers, their families and/or representative, working with other providers, and interacting in the community we serve.

#### A. Conflicts of Interest

##### Trustee:

No trustee shall participate in a vote or decision on a matter involving a business entity or contract in which the Trustee or any related person in the first degree by consanguinity or affinity has a substantial interest or take any steps, directly or indirectly, to influence or persuade other Trustees or any employee in connection with such matter, if it is reasonably foreseeable that an action on the matter would confer an economic benefit on the business entity. A person has a substantial interest in a business entity if:

- a. The person owns 10 percent or more of the voting stock or shares of the business entity or owns either 10 percent or more or \$15,000 or more of the fair market value of the business entity; or
- b. Funds received by the person from the business entity exceeds 10% of the person's gross income for the previous year.

A person has a substantial interest in real property if the interest is an equitable or legal ownership with a fair market value of \$2,500 or more.

If a Trustee or any related person has a substantial interest in a business entity or in real property, the Trustee, before a vote or decision on any matter involving the business entity or the real property, where it is reasonably foreseeable that any action on the matter will have a special economic effect on the business entity or on the value of the property distinguishable from its effect on the public, shall file an affidavit stating the nature and extent of the interest and shall abstain from further participation in the matter. Such affidavit shall be filed with the secretary of the Board of Trustees and shall be maintained in the records of the Center.

A Trustee shall not hold another office or position where one office is accountable or subordinate to the other, or where there is an overlap of powers and duties such that the Trustee could not independently serve in both positions.

**Employee:**

Except in the circumstances and on the conditions provided below, no employee shall participate in any decision or take any action in his or her capacity as an employee of the Center on a matter involving a business entity or real property in which the employee or any related person has an interest where it is reasonably foreseeable that a decision or action on the matter would confer an economic benefit on the business entity, the employee or related person.

Any employee engaged in providing clinical/rehabilitative services and/or support outside of Center employment must obtain prior written approval from their department head, appropriate Vice President and the Chief Executive Officer. Providing such services and/or support may be allowed if it does not interfere with or violate the efficient operation of The HARRIS CENTER or Board of Trustees approved Code of Ethics. Employees may not use Agency facilities or Agency property to assist them in providing such outside services and/or support; nor can employees use the Center's resources, personnel, facilities, or equipment for purposes other than for Center business.

**Trustee and/or Employee:**

No Trustee, nor any employee, shall accept any employment, office, or other position which might be expected to impair the independence or the judgment of such person in the performance of his or her duties with the Center.

***Examples of Conflict of Interest:***

1. Being employed (you or a close family member) by, or acting as a consultant to, a competitor or potential competitor, supplier or contractor, regardless of the nature of

the employment, while you are employed with The Harris Center.

2. Hiring or supervising family members or closely related persons.
3. Owning or having a substantial interest in a supplier or contractor of The Harris Center.
4. Having a personal interest, financial interest or potential gain in any Harris Center transaction.
5. Placing company business with a firm owned or controlled by a Harris Center employee or his or her family.
6. Accepting gifts, discounts, favors or services from a customer/potential customer, competitor or supplier, unless equally available to Harris Center employees.

Determining whether a conflict of interest exists is not always easy to do. Employees with a conflict-of-interest question should seek advice from management. Before engaging in any activity, transaction or relationship that might give rise to a conflict of interest, employees must seek review from their managers or the HR department.

#### **B. Nepotism**

1. A Trustee or Chief Executive Officer may not hire as a paid officer or employee of the community center a person who is related to a member of the board of trustees by affinity within the second degree or by consanguinity within the third degree.
2. An officer or employee who is related to a member of the board of trustees in a prohibited manner may continue to be employed if the person began the employment not later than the 31<sup>st</sup> day before the date on which the member was appointed.
3. The officer or employee or the member of the board of trustees shall resign if the officer or employee began the employment later than the 31<sup>st</sup> day before the date on which the member was appointed.
4. If an officer or employee is permitted to remain in employment under subsection (2), the related member of the Board of Trustees may not participate in the deliberation of or voting on an issue on an issue that is specifically applicable to the officer or employee unless the issue affects the entire class or category of employees.

The term "relative" as used in this section means any person related to the Trustee or employee (not closer than Aunt, Uncle, or Cousin).

#### **C. Commencement of Service**

Upon appointment as a Trustee and upon the employment of any employee, each Trustee and each employee shall execute an acknowledgement that he or she has read this Code of Ethics, any and all changes, revisions, or additions as amended; agrees to abide by its terms and conditions; and represents to the Center that, to the best of his or her knowledge and belief, he or she is not aware of any prior or existing violations of such Code of Ethics.

#### **D. Exchange of Gifts, Money and Gratuities**

The Harris Center is committed to competing solely on the merit of our services. We should

avoid any actions that create a perception that favorable treatment of outside entities by The Harris Center was sought, received, or given in exchange for personal business courtesies.

Business courtesies include gifts, gratuities, meals, refreshments, entertainment or other benefits from persons or companies with whom The Harris Center does or may do business. We will neither give nor accept business courtesies that constitute, or could reasonably be perceived as constituting, unfair business inducements that would violate law regulation or policies of The Harris Center or customers or would cause embarrassment or reflect negatively on The Harris Center's reputation.

Employees should always ask themselves whether it is appropriate to accept something from a person who wants, or may want, or may be seen to want, an official favor within their authority. It is unethical to accept or give a gift that is meant to sway a decision in favor of the gift-giver.

No Trustee or employee shall ask for, accept or agree to accept money, loans or anything of value as consideration for a decision or other exercise of discretion by a Trustee or employee.

A Trustee or employee shall reject any benefit for his or her past official actions in favor of another person.

No Trustee or employee shall exercise his or her official position without authority, fail to perform a required duty, or take or use any property of the Agency with the intent to obtain a personal benefit.

A Trustee or employee shall not misuse information that he or she receives, in advance other public entities, because of the Trustee's or employee's official capacity. A Trustee or employee shall not engage in any business activity that might lead to the disclosure of confidential information of the Agency or any of its consumers.

A Trustee or employee shall reject any job, favor, or other benefit that might tend, or is intended, to impair or influence his or her official conduct or independence.

Trustees and employees owe a duty of loyalty to the Agency and may not engage in any action on their own personal behalf, or that of another, which conflicts with the interests of the Agency.

No Trustee or employee shall engage in any related business activity or use a previous position of the Trustee or employee to gain any personal benefit for a period of one year following his or her separation as a Trustee or employee of the Agency.

No employee shall receive or accept compensation from any source other than the Agency, for the same services to the same consumer for which they receive compensation from the Agency.

- E. **Fraud, Waste and Abuse- It is the policy of the Harris Center to comply with all rules, regulations and laws pertaining to the delivery of and billing of behavioral health care services including payer programs and participation requirements of Medicare, Medicaid, other federal**

payers and third parties. All Harris Center employees, contractors, volunteers and agents have the responsibility of detecting, deterring and correcting fraud, waste and abuse. The Harris Center is committed to the submission of accurate claims for payment and providing training regarding billing and claims submission. All Harris Center employees, contractors, volunteers and agents shall adhere to the following guidelines:

1. Must not engage in fraud, waste or abuse.
2. Shall not present or cause to be presented claims which are false or fraudulent.
3. Shall not make, use, or cause to be made or used a false record or state to get a false or fraudulent claim paid.
4. Shall comply with Harris Center policies and procedures which apply to them, including those policies regarding documentation, medical records, medical necessity, billing, coding, fees, licensure, compliance with state and federal laws and regulations and government audits, reviews and investigations.
5. Employees and contractors performing billing or coding services on behalf of the Harris Center shall have the skills, quality assurance processes, systems and procedures that are necessary to submit accurate claims.

#### **F. Personal Fundraising**

It is the policy of The Harris Center to minimize disruptions in the workplace caused by the unauthorized sale of items, solicitations of contributions, or the distribution of advertising materials. Furthermore, it is counterproductive for employees to feel pressured to contribute financially to any enterprise whether it is a for-profit or non-profit.

1. Fundraising and/or solicitation by or of employees during work hours and/or on Harris Center property without authorization from their immediate supervisor or designee is strictly prohibited.
2. Solicitation means any verbal or written communication which encourages, demands, or requests a contribution of money, time, effort or personal involvement for any enterprise. This includes, but is not limited to, charitable or personal profit activities such as, selling products of any kinds, raffle tickets, admissions to events and donations to assist persons experiencing a personal crisis.
3. Employees who wish to solicit on behalf of their children's schools, scouting programs, or other not-for-profit purposes, including for the benefit of a person or co-worker involved in a personal tragedy, must submit a written request to their immediate supervisor.
4. Employees may not initiate any fundraising and/or solicitation activities until written authorization has been obtained from their immediate supervisor.
5. The Harris Center's interoffice and email systems may not be used to communicate information about non-Harris Center sponsored fundraising activities.

#### **G. Service Delivery**

- ~~1. The Harris Center will provide quality behavioral health care in a manner that is, determined to be medically necessary, effective and the least restrictive treatment alternative.~~
- ~~2. Ensure that consumer information is kept confidential according to applicable~~

~~federal, state, and local laws.~~

- ~~3. All Harris Center employees, contractors, volunteers, and interns shall follow current ethical standards regarding communication with consumers (and their representatives) regarding services provided.~~
- ~~4. The Harris Center will inform consumers about alternatives and risks associated with the care they are seeking and obtain informed consent prior to any clinical interventions.~~
- ~~5. The Harris Center recognizes the right of consumers to make choices about their own treatment, including the right to refuse treatment.~~

#### **H. Setting boundaries**

~~While the nature of the job responsibilities of the Center staff members requires that they interact closely with consumers, it should be emphasized that these relationships must be kept on a professional level. It is the responsibility of the Center staff member to ensure that a supportive, yet professional relationship is maintained, and is perceived as such by all involved.~~

~~No Trustee or employee of the Agency shall file for managing conservatorship or guardianship, petition to terminate parent/child relationships, or file for adoption of any child who is a consumer or whose family is a consumer of The HARRIS CENTER.~~

~~All current and former Trustees, employees, Consultants, and Volunteers of The HARRIS CENTER will hold all information pertaining to The HARRIS CENTER, its consumers, and its employees in confidence, and shall not engage in any activity that might lead to the disclosure of confidential information of the Center or its consumers, except as may be required by law.~~

~~All Harris Center Employees, contractors, interns, and volunteers shall adhere to the following guidelines:~~

- ~~1. Place the needs of their consumers on their caseload at the center of any treatment-related decisions that you make about them and their lives.~~
- ~~2. Shall not disclose personal or financial information with consumers.~~
- ~~3. Understand the limitations of their role and personal capabilities, and when to refer to other professionals or to seek further support and advice.~~
- ~~4. Refrain from connecting with their consumers on social media.~~
- ~~5. Maintain a courteous and respectful attitude with all consumers equally.~~
- ~~6. Do no give or accept gifts, loans, money, or other valuables to or from the consumer.~~
- ~~7. Always clarify your professional role with the consumer.~~

#### **I. Witnessing of legal documents**

- ~~1. Harris Center employees shall not agree to be a witness or sign as a witness on any legal documents (e.g., Declaration for Mental Health Treatment, durable power of attorneys, medical power of attorney, wills) a consumer presents.~~
- ~~2. Employees shall inform the consumer they will need to obtain their witnesses not~~

~~employed or contracted by the Harris Center for legal documents.~~

- ~~3. Employees who are notary publics and obtained their commission for Harris Center business shall only notarize documents related to The Harris Center business.~~

#### **J. Marketing**

The Harris Center is committed to adhering to the highest ethical and legal standards in its marketing practices. The Harris Center shall adhere to the following marketing practices:

1. Clear and accurate representation of its services and programs. The Harris Center is committed to avoiding deception in any form (e.g. omission, misrepresentation, or misleading practices). The Harris Center's goal is to deliver the programs and services as depicted by its marketing communications.
2. Transparency and disclosure. Complete information shall be provided to our patients about our programs, services, terms and conditions and costs to ensure informed consent. The Harris Center shall act in a manner that is responsive, transparent and accountable to existing and prospective patients.
3. Protect Confidential Information. The Harris Center shall protect confidential and proprietary information of its patients and business operations.

#### **H. Service Delivery**

1. The Harris Center will provide quality behavioral health care in a manner that is, determined to be medically necessary, effective and the least restrictive treatment alternative.
2. Ensure that consumer information is kept confidential according to applicable federal, state, and local laws.
3. All Harris Center employees, contractors, volunteers, and interns shall follow current ethical standards regarding communication with consumers (and their representatives) regarding services provided.
4. The Harris Center will inform consumers about alternatives and risks associated with the care they are seeking and obtain informed consent prior to any clinical interventions.
5. The Harris Center recognizes the right of consumers to make choices about their own treatment, including the right to refuse treatment.

#### **H. Setting boundaries**

While the nature of the job responsibilities of the Center staff members requires that they interact closely with consumers, it should be emphasized that these relationships must be kept on a professional level. It is the responsibility of the Center staff member to ensure that a supportive, yet professional relationship is maintained, and is perceived as such by all involved.

No Trustee or employee of the Agency shall file for managing conservatorship or guardianship, petition to terminate parent/child relationships, or file for adoption of any child who is a consumer or whose family is a consumer of The HARRIS CENTER.

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- b. Shall not disclose personal or financial information with consumers.
- c. Understand the limitations of their role and personal capabilities, and when to refer to other professionals or to seek further support and advice.
- d. Refrain from connecting with their consumers on social media.
- e. Maintain a courteous and respectful attitude with all consumers equally.
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2. Employees shall inform the consumer they will need to obtain their witnesses not employed or contracted by the Harris Center for legal documents.
3. Employees who are notary publics and obtained their commission for Harris Center business shall only notarize documents related to The Harris Center business.

#### **J. Reporting Procedures**

Persons who become aware of any actual or potential conflict of interest, fraud, waste, abuse, or any other ethical concern regarding their employment or another employee at the Harris, must immediately report the matter to the Harris Center's Compliance Director or at [www.fraudhl.com](http://www.fraudhl.com) or 1-855-372-8345 (1-855-FRAUD-HL). The hotline is available 24 hours a day, seven days a week. Use the Company ID "Harris" to submit a report. All reports to the Harris Center shall remain confidential. All reports of violations of this policy will be reviewed within seven (7) business days from the date the report is received. Investigations of code of ethics violations will be concluded no later than fourteen (14) business days from the date the report is received.

#### **K. Corrective Action**

Harris Center employees, volunteers, contractors and agents who violate this Code of Ethics policy will be subject to disciplinary action, up to and including, termination and criminal prosecution. Failure to act when an employee, volunteer, contractor or agent has knowledge that someone has violated this policy shall be subject to disciplinary action, including termination of employment and criminal prosecution.

#### **L. No Retaliation**

The Harris Center prohibits any form of discipline, reprisal, intimidation or retaliation for reporting a

potential conflict of interest or violation of this policy or cooperating in related investigations.

### 3. APPLICABILITY/SCOPE:

All Harris Center Board of Trustees, employees, interns, volunteers and contractors.

### 4. RELATED POLICIES/FORMS (for reference only):

Agency Compliance Plan

### 5. REFERENCES: RULES/REGULATIONS/STANDARDS:

- Community Centers, Tex. Health & Safety Code Ch. 534
- Regulation of Conflicts of Interest of Officers of Municipalities, Counties and Certain Other Local Governments, Tex. Local Government Code Chapter 171

### Approval Signatures

Step Description	Approver	Date
Management of Board Approval	Christopher Webb: Audit	Pending
CEO Approval	Wayne Young: Exec	05/2025
Legal Review	Kendra Thomas: Counsel	05/2025
Initial Assignment	Wayne Young: Exec	05/2025