

ARIZONA DEPARTMENT OF ECONOMIC SECURITY

Program Name: Vocational Rehabilitation (VR)

Policy Number: VR-1.6-v1

Effective Date: July 1, 2008

Last Revision: March 31, 2021

CHAPTER 1: Introduction

Section 1.6: Employee Conflict of Interest

I. Policy Statement

The purpose of this policy is to provide guidance in identifying and handling potential and actual conflicts of interests in VR. It is not the intent of this policy to regulate or eliminate all perceived or identified conflicts of interest but rather enable VR staff to recognize situations that may raise legal and ethical issues and ensure such situations are properly disclosed, reviewed and completed.

II. Authority

Authority for policies contained in this document includes the following:

- A.R.S. Article 8 §§ 38-501-511
- Code of Professional Ethics for Rehabilitation Counselors Section D(5)(f)

III. Applicability

This applies to circumstances when an applicant or client may have a conflict of interest with VR staff. The applicant/client must:

- A. Notify if they are a vendor for, or appointed member of a council responsible for oversight of any aspect of the Rehabilitation Services Administration.
- B. Notify if they are a family member or a close associate of an employee of VR.

This applies to circumstances when a VR employee wishes to apply for VR services. The VR employee must:

- C. Notify their Regional Program Manager, or Deputy Administrator if they apply to become a client of any VR program.
- D. Notify their Regional Program Manager, or Deputy Administrator if one of their family members or close associates is currently a client of any VR program.

IV. Standards

- A. VR staff must not engage in the following activities during work time in regard to their family members', close associates' or their own cases:
 - 1. Receive, participate, or attend services funded from any VR program.
 - 2. Communicate with any other employees or vendors concerning the status of a client.
 - 3. Advocate, research, or provide advisement.
 - 4. Use equipment or resources provided from VR.
 - 5. Provide services in the same office location where the employee is located.
- B. VR staff must not have access to family members', close associates', or their own cases.
- C. VR must treat all clients equally and fairly, regardless of their status as an AZRSA employee, close associate, or vendor
- D. All VR employees must report when a potential conflict of interest as defined in this policy to their upline supervisor or manager.
- E. All case decisions may be placed on hold until the Program Supervisor or Program Manager provides a determination related to the client's case assignment.

V. Procedure

- A. In instances when the Program Supervisor or Program Manager determines a conflict of interest exists, they will reassign the client's case to a different VR counselor in a different office to ensure the confidentiality and protection of the client's case.
- B. In instances when a conflict of interest exists for the Regional Program Manager, or Deputy Administrator, a designee will be appointed to review the case.

VI. Documentation Requirements

The client's electronic case file must include the following:

- A. Any action taken or decision related to addressing any potential conflict of interest must be documented in the ECF.