Conflict of Interest

I. Purpose

To provide guidance to employees regarding avoiding ethical dilemmas in the delivery of VR services when a friend, family member, partner, acquaintance, colleague, or other applies for VR services. Please see the CRC website for the Code of Ethics for specific standards of ethical practice.

II. Procedure

The moment a potential conflict of interest arises, it is the responsibility of the VR staff member to report this to his or her regional administrator (RA), Assistant Director, or other Central Office Administrator where the conflict does not exist. It is the responsibility of the counselor and member of the leadership team identified to ensure appropriate arrangements are made to secure cases for the following:

- Family members which may include:
  - parents, spouses, partners, siblings, children, stepfamily members, in-laws, cousins, aunts, uncles, grandchildren, and grandparents

- Other individuals including but not limited to:
  - Friends, colleagues, ex-colleagues, acquaintances, and neighbors

The identified administrator may need to consult with the Assistant Director/Director to determine if action is needed to eliminate the conflict of interest. To avoid any type of conflict, a case may be transferred to another region. Legal and ethical principles should assist in making the best possible decision with the participant. The Assistant Director/Director will determine the regional office that will manage the case, if appropriate.

Cases will be secured in both AWARE ND and FileNet. Any hard copy files, including closed cases, will be secured in a locked file cabinet. Only designated staff members will have access to the case(s).

III. Considerations

There are multiple items that counselors need to consider to support confidential cases.

- Who will pay the authorizations?
- Is the participant willing to work with other staff members (Career Assessment Specialist, Business Services, Vision Specialist, Other Counselors, etc.)
- Who can support the case when staff are on leave, consider all roles?
- Who can this case be staffed with?

When the counselor is assigned a confidential case, they will ensure that anyone who is brought into the case understands who they may be able to discuss the case with and who they cannot. In some cases, staff members involved may not be able to discuss the case with their direct supervisor due to the conflict that exists.

If a staff member discusses the case with an unauthorized staff person, that is a breach of confidentiality that needs to be reported. link to breech policy.

Summary of Changes from Prior Policy

Below is a brief summary of changes, please review the procedure above for complete details on these changes.

7/22/2025

- Added Link to the CRCC Code of Ethics.
- Updated list of who to notify of the conflict and provided guidance on how to handle a confidential case and securing the data in FileNet.
- Guidance was provided to think about who will need to have access to the case.
- There was also guidance that any breech will need to be reported.