



Department of  
Mental Health

John R. Kasich, Governor  
Tracy J. Plouck, Director

June 7, 2013

Randall J. Meyer,  
Inspector General  
Office of the Inspector General  
30 East Broad Street, Suite 2940  
Columbus, Ohio 43215-3414

RE: **IG File ID No. 2011-220**

Dear Inspector General:

Thank you for the opportunity to respond to the three recommendations made by your office in the case of Appalachian Behavioral Healthcare (ABH) employee Taffnie Lent. The recommendations and specific responses are noted below. Please refer to the enclosures in support of our response.

**1.) Determine if the conduct of Taffnie Lent warrants administrative action.**

November 20, 2011 an allegation was reported to ABH police that employee Ms. Lent received personal rewards through the use of bonus points earned through state credit card purchases. ABH immediately determined that administrative action was warranted and opened an administrative investigation.

November 29, 2011 this office notified the Governor's Office, the OSHP and the OIG regarding the alleged suspected illegal activity of ABH employee Taffnie Lent. On 12/7/2011 the ODMH security consultant forwarded the investigative information to the OIG, (See enclosure, December 7, 2011 letter to IG Rodney Stewart), and ABH placed their administrative case on hold November 30, 2011, pending the IG's case determination and direction.

With IG acknowledgment, ABH concluded the employee administrative investigation. Ms. Lent received a five (5) day working suspension and a last chance agreement dated 2/14/2013.

**2.) Review the appropriate policies and procedures regarding the use of state-issued payment cards with those employees who have been issued cards. In particular, remind the employees regarding the use of rewards cards when making purchases on behalf of the state.**

*ABH specific response:*

According to CEO Jane Krason, "every ABH state-issued payment card holder" receives department approved training on the appropriate card use to include the prohibition of personal benefit. (See enclosures, ODMH policy AF-13 and AF-09; ABH policies B-12, 12A Purchasing, and L-12 Code of Ethical Conduct.) Ms. Lent received training in 2009 and reviewed and signed the State of Ohio cardholder agreement, which included the warning to not use the Payment Card for personal gain. She also received a copy of the Payment Card Manual. (See

**Establishing mental health as a cornerstone of overall health**

30 East Broad Street  
Columbus, Ohio 43215  
mentalhealth.ohio.gov

614 | 466-2596  
614 | 752-9696 TTY  
614 | 752-9453 Fax

2013 JUN - 7 AM 10: 26  
OFFICE OF  
INSPECTOR GENERAL

enclosure, cardholder agreement.) ABH also provided all employees an Ohio Ethics Law 2012 training which included the prohibition from accepting awards/discounts from purchases made through and with public funds. (See enclosure, ABH power point training slide on Ethics law.)

*ODMH statewide fiscal response:*

The Ohio Department of Mental Health and Addition Services is planning agency-specific payment card training which will be developed using the OBM training and also incorporate the rules governing vendor rewards programs. It is anticipated the training will take place the month of August 13, 2013. Every payment card holder and the payment card supervisor will be required to attend, with subsequent training required annually. Agency policy AF-13 (Guideline for Proper Usage, Documentation, and Approval of Payment Cards) will be updated to include this requirement. (See enclosure, 6/6/2013 memo to Michaela Peterson, Deputy Director Legal and Regulatory Services from Merrilie Munsey, Agency Procurement Officer.)

**3.) Conduct an inventory of items Lent purchased on behalf of Appalachian Behavioral Healthcare facility to ensure other items are not missing.**

According to CEO Jane Krason, in the course of the ABH investigation, ABH determined that “no items were missing from purchases made by Lent.” CEO Krason further determined that procedures were “followed to verify that each purchase made was received.” Additionally, ABH’s investigation determined that the printer cartridges purchased by Lent were accounted as returned to the hospital.

If you have any further questions or need more information, please contact me at (614) 466-8288, or ODMH security consultant, Nacrina Alvarez Blanco, at (614)752-9684.

Sincerely,



Michaela J. Peterson, Chief Legal Counsel, Deputy Director Division of Legal and Regulatory Services, ODMH

Cc: Tracy J. Plouck, Director, Ohio Department of Mental Health  
David Colletti, Deputy Director of Hospital Services, ODMH  
Vincent Conner, Deputy Director of the Office of Human Resources, ODMH  
Jane Krason, CEO Appalachian Behavioral Healthcare  
Nacrina Alvarez de Blanco, Security Consultant, ODMH

## **IG File ID No. 2011-220**

### **Enclosures from ODMH**

-  June 6, 2013 ODMH Fiscal Services memorandum to Chief Legal Counsel
-  December 7, 2011 letter to IG Rodney Stewart
-  ODMH policy AF-13
-  ODMH policy AF-09
-  ABH policy B-12 Purchasing
-  ABH policy B-12A Purchasing
-  ABH policy L-12 Code of Ethical Conduct
-  ABH power point slide "Shopping Rewards Cards"
-  State of Ohio Cardholder Agreement & the Ohio Cardholder Agreement as signed off by Taffnie Lent (2009)



**Department of  
Mental Health**

**John R. Kasich**, Governor  
**Tracy J. Plouck**, Director

Date: June 6, 2013

To: Michaela Peterson  
Deputy Director  
Legal and Regulatory Services

From: Merrilie A. Munsey, CPPO, ~~CPPB~~  
Agency Procurement Officer and  
Fiscal Services Business Office Supervisor

Through: Dalon K. Myricks   
Deputy Director  
Financial Management

RE: Office of the Inspector General Report of Investigation  
Response to Recommendation Two of the File ID Number 2011-220

This memo is in response to the second recommendation of the Office of the Inspector General Report of Investigation, File ID number 2011-220, which states the "Ohio Department of Mental Health should review the appropriate policies and procedures regarding the use of state-issued payment cards with those employees who have been issued cards. In particular, remind the employees regarding the use of rewards cards when making purchases on behalf of the state."

It has been the practice of the Ohio Department of Mental Health to require both the potential payment card holder and the supervisor of the potential payment card holder to attend the Office of Budget and Management's (OBM) Payment Card Training program prior to issuing a payment card to the potential payment card holder. However, the OBM training has not previously addressed the use of vendor rewards programs that may be associated with purchases such as that employed by Staples.

As a result of the OBM training not addressing the use of vendor rewards programs, the Ohio Department of Mental Health and Addiction Services is planning agency-specific payment card training which will be developed utilizing the basis of the OBM training, but incorporating the rules governing vendor rewards programs. It is anticipated the training will take place in the month of August, 2013, and will be required of every payment card holder, payment card holder supervisor, and payment card transaction approver within the Ohio Department of Mental Health and Addiction Services. Individual training participation will be monitored and subsequently required on an annual basis. The agency policy AF-13 (Guideline for Proper Usage, Documentation, and Approval of Payment Cards) will be updated to include this requirement.

**Establishing mental health as a cornerstone of overall health**

30 East Broad Street  
Columbus, Ohio 43215  
mentalhealth.ohio.gov

614 | 466-2596  
614 | 752-9696 TTY  
614 | 752-9453 Fax



Department of  
Mental Health

John R. Kasich, Governor  
Tracy J. Plouck, Director

December 7, 2011

Rodney Stewart  
First Assistant Inspector General  
Office of the Inspector General  
30 East Broad Street, Suite 2940  
Columbus, Ohio 43215-3414

RE: **IG File ID No. 2011-220**

Dear First Assistant Inspector General Rodney Stewart:

On 11/29/11 this office notified the Governor's Office, the OSHP and the OIG regarding the alleged suspected illegal activity, of an Appalachian Behavioral Healthcare employee Taffnie Lent. Allegedly, she gave her personal information to Staples office supply store, where she appears to have made legitimate State of Ohio business purchases and earned bonus points to her personal Staples account, which she redeemed for items worth approximately \$987.71.

On 11/30/11 James Manken advised that the OIG was opening an investigation on this matter and would be consulting with the Ohio Ethics Commission. Enclosed for your review is the investigative information collected thus far by ABH police before we placed the case on hold November 30, 2011, and additional information gathered without interviewing alleged suspect employee.

The packet of information for your review includes:

- Initial Police Investigation Report (currently open and on hold)
- Payment Card Log and corresponding Staples receipts
- Employee information for Taffnie Lent:
  - OAKS employee history report
  - Employee position description
  - Employee training record to include Ohio Ethics Law training
- ODMH policies to include:
  - ODMH Ethics Policy L-4, effective 8/2011
  - ODMH Ethics Policy L-4, effective 7/2007

Establishing mental health as a cornerstone of overall health

30 East Broad Street  
Columbus, Ohio 43215  
mentalhealth.ohio.gov

614 | 466-2596  
614 | 752-9696 TTY  
614 | 752-9453 Fax

- ODMH Code of Conduct and General Work Rules, effective 1-1-2010
- Ohio Ethics Law Opinion 91-010
  - Ohio Ethics advisory opinion regarding bonus points Dated September 19, 2011:  
*Public employees are prohibited from accepting reward discounts earned from making purchases for their public agencies with public funds.*
- Suspected Illegal Activity Memorandum and corresponding email

Our administrative case is on hold and we will not interview the alleged suspect employee until we hear back from either you and/or the Ohio Ethics Commission. Currently the employee Taffnie Lent is on a medical leave. The complainant works on 3<sup>rd</sup> shift, and we would be glad to arrange a time for you to interview as needed.

If you have any further questions, comments or concerns, or need to set up interviews, please contact me at (614)752-9684.

Sincerely,



Nacrina Alvarez de Blanco, Security Consultant, ODMH

Cc: Tracy J. Plouck, Director, Ohio Department of Mental Health  
Michaela J. Peterson, Chief Legal Counsel, Deputy Director  
Division of Legal and Regulatory Services, ODMH  
Bob Short, Deputy Director of Hospital Services, ODMH  
Vincent Conner, Deputy Director of the Office of Human  
Resources, ODMH  
Jane Krason, CEO Appalachian Behavioral Healthcare

**Ohio Department of Mental Health**

**Document Number: AF-09**

**Type of Document: Policy**

**Authority Source: AM. Sub H.B. 562 127<sup>th</sup> General Assembly; S.B. 131; ORC Sections 9.24, 9.312, 102.01 to 102.09, 123.011, 125.01 to 125.112, 125.17, 125.31 to 125.76, 127.16, 3304.28 to 3304.33, 5119.16, 5147.07, and 5513.02; OAC Rules 123:5-1-01 to 123:5-1-15; Executive Order 2008-12S; DAS Directive 09-21 (aka GS-D-12); DAS Procedures PUR-001 to PUR 016**

**Document Title: Procurement Procedures for Supplies, Services and Information Technology**

**Applicability Statement: All Employees**

**Exceptions if Applicable: None**

**Effective Date: 6-14-2011**

**Replaces: 9-23-2008; 4-12-2011**

**Directed To: All ODMH Employees**

**Distributed By: Office of Fiscal Administration**

**Procurement Procedures for Supplies,  
Services and Information Technology**

A. Purpose.

The purpose of this procedure is to establish uniform purchasing procedures throughout the Ohio Department of Mental Health (ODMH).

B. Definitions.

1. "Biobased product" means a product determined by the United States Secretary of Agriculture to be a commercial or industrial product, other than food or feed, which is composed, in whole or in significant part, of biological products, renewable domestic agricultural materials, forestry materials, or is an intermediate ingredient of feedstock.
2. "Competitive selection" means a process used by the State of Ohio to award purchasing opportunities to the lowest responsive and responsible bidder and includes the following procedures for making purchases:
  - a. Competitive sealed bidding under section 125.07 of the Revised Code;
  - b. Competitive sealed proposals under section 125.071 of the Revised Code;
  - c. Reverse auctions under section 125.072 of the Revised Code.

3. "Controlling Board" means the legislative body which provides oversight to ensure funds appropriated by the legislature are used appropriately, consistent with the original intent; and has the authority to waive competitive selection.
4. "Direct purchase" means a purchase made directly by ODMH in which the goods or services needed are not available from any state resources or from any DAS contracts, that does not exceed \$50,000 in aggregate for goods and/or services from a single vendor per state fiscal year.
5. "Encouraging Diversity, Growth, and Equity (EDGE) Program" means the contract assistance program designed to assist socially disadvantaged and economically disadvantaged businesses in Ohio.
  - a. Socially disadvantaged includes those individuals who have at least one objective distinguishing feature that has significantly inhibited their business success such as race, ethnic origin, gender, physical/mental disability, long-term residency in an environment isolated from mainstream Ohio society, located in a qualified census tract, or other objective relevant reason.
  - b. Businesses are considered to be economically disadvantaged when the personal net worth of each owner does not exceed \$250,000 at program entry and personal net worth of each owner must not exceed \$750,000 during program participation.
6. "Minority Business Enterprise" (MBE) means the individual, partnership, corporation, or joint venture of any kind that is owned and controlled by United States citizens who are residents of Ohio; who are members of one of the following economically disadvantaged groups: Blacks, Native Americans, Hispanics, and Asians; and who are certified by the Ohio Department of Administrative Services (DAS), State Equal Employment Opportunity Coordinator.
  - a. "MBE participation purchase" means a purchase made through competitive selection on the open market in which an MBE-certified vendor is awarded.
  - b. "MBE set-aside purchase" means a purchase selected for restricted competition among certified MBEs only.
7. "Purchase order" means a legally binding document between the vendor and ODMH detailing the good and/or service to be provided by the vendor and paid for by ODMH.
8. "Release and permit" means an issuance by DAS to a state agency when the purchasing limit exceeds the agency's direct purchase authority and when it has been determined that the product or service cannot be procured by DAS through the competitive selection process.
9. "Request to Purchase" (when referenced by DAS) means the electronic form formerly known as the Release and Permit Request.
10. "Request to Purchase" (when referenced by ODMH) means the electronic form located on the ODMH Intranet which details a specific purchase to include the requestor of the good and/or service, the approver of the purchase of the good and/or service, the suggested vendor and contact information, fund coding, and the detailed specifications of the good and/or service requested. The form is utilized to create an OAKS requisition and subsequent purchase order.

11. "Requirements contracts" means the term contracts that are effective for an extended period of time, usually one to three years. There are several categories of term contracts. Some are mandatory, others are optional:
- a. "Agency specific contract" (ASC) means a mandatory contract addressing the specific needs of a given agency. The contract is available only for the agency listed and includes items such as elevator maintenance and laundry service.
  - b. "General distribution contract" (GDC) means a mandatory term contract containing popular items utilized by many agencies. GDCs are available to all agencies and include items such as vehicles, gasoline, cut size paper, and clothing.
  - c. "Limited distribution contract" (LDC) means a mandatory contract addressing specific needs of multiple named agencies. The contract is available to only the named agencies listed on the contract and includes items such as trash removal, housekeeping, and food service.
  - d. "Master maintenance agreement" (MMA) means an optional contract available for maintenance and service of equipment that is no longer covered under a manufacturer's warranty and is available for computer hardware, software, copiers, vending machines, and other equipment. Services may include remedial maintenance calls and preventative maintenance inspections, but are not to be used to furnish consumables, relocate equipment, or repair damage due to intentional abuse by the customer.
  - e. "Multiple award contract" (MAC) may be mandatory or optional and include more than one supplier for the same or comparable supplies or services. The contract language must be reviewed to determine whether the contract is mandatory or optional. "State Term Schedule" is a type of contract negotiated between DAS and vendors for use by all state agencies and political subdivisions in which the vendor was required to provide the state with either the manufacturer's Federal GSA pricing or their best commercial pricing.
  - f. "State term schedule" (STS) means an optional contract for supplies or services. The contracts are price solicitations that include multiple suppliers for similar types of supplies or services.
    - i. "General Services Administration-based State Term Schedule" (GSA-Based STS) means an optional contract based upon the federal government's Supply Schedule Contract Program administered by the General Services Administration (GSA). The federal schedules frequently offer goods and services that may be of interest to state agencies. The state does not participate directly in the GSA contracts, but uses them as a foundation and template inserting additional terms and conditions favorable to the State of Ohio.
    - ii. "Non GSA-based STS" means an optional contract not based upon GSA pricing, but instead based upon the most favored pricing for customers who are similarly situated as the state of Ohio.

C. General.

1. Required state sources of supply (Think Ohio First):

- a. Law requires that first consideration is given to certain state resources prior to making the purchase from another source. Prior to making any purchase, the purchaser must first determine if the supply or service is available from any of the following sources (in order of ranking):
    - i. Ohio Penal Industries (OPI), section 5147.07 of the Revised Code;
    - ii. DAS Office of Procurement from Community Rehabilitation Programs (OPCRP), sections 125.60 to 125.6012 of the Revised Code;
    - iii. Rehabilitation Services Commission (RSC), Bureau of Services for the Visually Impaired, sections 3304.28 to 3304.33 of the Revised Code;
    - iv. ODMH Office of Support Services, section 5119.16 of the Revised Code - institutional agencies only;
    - v. DAS Office of State Printing, sections 125.31 to 125.76 of the Revised Code; and
    - vi. DAS Office of Procurement Services, sections 125.01 to 125.11, and section 125.17 of the Revised Code.
  - b. Purchases may be made from these sources without dollar limitation. Additionally, purchases made from these sources are not counted against the ODMH cumulative annual purchasing threshold. Waivers may be granted from the source in certain cases; however, waivers must be obtained prior to ordering the good or service from an alternate vendor. For more information on internal state sources, consult the State of Ohio Procurement Handbook for Supplies and Services.
2. DAS Term Contracts.
- a. DAS, through the Office of Procurement Services has established requirements term contracts for a variety of supplies, services and information technology needs. These contracts have been established under formal competitive processes set forth in law or by the Controlling Board. The purpose of these contracts is to enable agencies to procure their needs without any further delay resulting from the competitive processes the agency must follow when using direct purchase authority. ODMH may purchase from these contracts without dollar limitation at any time during the effective life of the contract.
  - b. When making a purchase from a STS contract, if there are multiple vendors listed on the STS offering similar or like items, price quotations are required. The number of quotations required is based upon the number of vendors listed on the STS. If there are only two vendors listed on the STS, two quotations are required. If there are three or more vendors listed on the STS, a minimum of three quotations are required.
  - c. If the value of the purchase exceeds the Maximum Order Limit (MOL) listed in the contract, the ODMH purchaser is required to contact the DAS Office of Procurement Services for assistance in negotiating lower pricing from the supplier. Purchases made above the MOL, which have not been reviewed and approved by the DAS Office of Procurement Services, may be considered to be invalid. Unless otherwise stated in the contract, ODMH is required to use STS contracts before using their direct purchase authority. Purchases made from DAS term contracts are not counted against the ODMH cumulative annual threshold.

- d. Occasionally, if a contract supplier is unable to fulfill the needs of ODMH, the DAS Office of Procurement Services may grant a special waiver to ODMH to purchase the good or service needed from another source. ODMH must not proceed with the purchase from another source until the waiver has been received. If ODMH proceeds with the purchase prior to receiving the waiver and the waiver is denied, the person at the agency who authorized the purchase may be held personally liable for the purchase.
3. Biobased products, (section 125.092 of the Revised Code and rule 123:5-1-14 of the Administrative Code.)
    - a. The biobased product preference program, applies to all state agencies. Biobased language must be included in all bid documents as applicable for the purchase of equipment, material, or supplies.
    - b. When purchasing equipment, material, or supplies, ODMH shall purchase biobased products in accordance with the biobased product preference program established by DAS. The biobased product preference program requires state agencies and state-supported colleges and universities to give purchasing preference to biobased products when available. This preference applies to purchases made from OPI, OPCRP vendors, and those made using direct spending authority on the open market. The Catalog of Biobased products, also known as the BioPreferred Catalog, (<http://www.catalog.biopreferred.gov/bioPreferredCatalog/faces/jsp/catalogLanding.jsp?SMSESSION=NO>) may be found in the Help and Reference Materials (<http://procure.ohio.gov/proc/help.asp>) "State Procurement Reference Materials" drop down menu of the DAS State Procurement website.
    - c. ODMH must compare the lowest responsive and responsible bid or the most advantageous offer for a non-biobased product to the lowest responsive and responsible bid or the most advantageous offer for a biobased product containing the highest percentage of biobased content.
    - d. The purchasing location may determine that it is not possible for a biobased product to be purchased in accordance with the program if:
      - i. The product is not available within a reasonable period of time;
      - ii. The product fails to meet performance standards set forth in the applicable specifications for the product; or
      - iii. The price of the product is an unreasonable price. A price is considered unreasonable if the price of the biobased product exceeds the price or fair market value of a substantially equivalent non-biobased product by up to five percent.
    - e. Should one of the three exceptions listed in (3)(d) of this paragraph occur, the purchasing location may consider the other products submitted that offer a lower percentage of biobased content and that meet all other requirements in descending order beginning with the next highest percentage content of biobased material.
    - f. If all of the biobased bids are excluded, the procurement official may consider an award of the contract to non-biobased product bids.

- g. The number and types of biobased products purchased, as well as the dollars spent, are compiled in a report by DAS, by agency, and submitted to the Governor, President of the Senate, and the Speaker of the House of Representatives no later than September 30 of each year.
  - h. The biobased product preference program does not apply to the purchase of motor vehicle fuel, heating oil, or electricity.
4. Delegated purchase authority.
- a. The direct purchase limit is \$25,000 for both supplies and services, however, DAS is permitted by law to increase the \$25,000 limit to \$50,000 and to delegate this authority to agencies that have certified procurement staff handling their purchasing processes. DAS has currently delegated authority to ODMH for the direct purchase limit of \$50,000 for both supplies and services.
  - b. For more information on delegated purchasing authority and professional certification of staff consult the State of Ohio Procurement Handbook for Supplies and Services at [http://procure.ohio.gov/pdf/PUR\\_ProcManual.pdf](http://procure.ohio.gov/pdf/PUR_ProcManual.pdf).
5. Pre-Approvals, Release and Permits, Controlling Board
- a. Certain types of items require review and pre-approval by DAS prior to making the purchase (e.g., computers, telecommunications equipment – including phones, printed goods, multi-functional print devices which are any combination of fax/printer/scanner/copier, and vehicles). When making purchases of this nature, and before issuing a purchase order and/or entering into any agreements with a supplier, contact the appropriate office:
    - i. Information Technology (IT): Office of Information Services, Acquisition Coordinator
    - ii. Multi-Functional Print Devices: Office of Fiscal Administration, Printer Coordinator
    - iii. Printed Goods: Office of Fiscal Administration, Purchasing Coordinator
    - iv. Telecommunications: Office of Fiscal Administration, Telecommunications Coordinator
    - v. Vehicle: Office of Fiscal Administration, DMH Fleet Coordinator
  - b. The approvals needed are based upon the type of good or service being purchased: non-IT-related purchases and IT-related purchases.
    - i. Non-IT-related – When the purchase exceeds the direct purchase limit and the DAS Office of Procurement Services determines it is not practicable or advantageous for its office to make the purchase, ODMH will be granted a Release and Permit to make the purchase using their direct authority. Purchases \$50,000 and over require both a Release and Permit and Controlling Board approval.
    - ii. IT-related – For IT-related purchases requiring a Release and Permit, ODMH blanket Release and Permit approval may be used up to \$25,000. For IT-related purchases over \$25,000 up to \$50,000 requiring a Release and Permit, an Office of Information Technology (OIT) Release and Permit is required (as opposed to the ODMH blanket

Release and Permit). Purchases that are not on STS and are \$50,000 and over require both an OIT Release and Permit and Controlling Board approval. All IT Release and Permit purchase approvals are coordinated by the Office of Information Services located in Central Office.

- c. For either type of purchase, when the direct purchase does not exceed the \$50,000 cumulative annual threshold, Controlling Board approval will not be required unless the funding source requires such approval (e.g. capital funds). However, if the purchase causes the agency to exceed the \$50,000 cumulative annual threshold for that supplier or the purchase does not follow competitive selection, the ODMH purchaser must seek approval from the Controlling Board to proceed with the purchase.
- d. Controlling Board Requests are coordinated in Central Office and the coordinating area is based upon the type of Controlling Board request. Controlling Board requests for purchased personal service only are coordinated by the Office of Human Resources. Capital item Controlling Board requests are coordinated by the Office of Capital Planning and Management. All other Controlling Board requests are coordinated by the Office of Fiscal Administration.
- e. A minimum of ten working days should be allowed for DAS processing of pre-approvals and Release and Permits. When seeking a Release and Permit, the ODMH purchaser begins the process by completing the DAS Request to Purchase form located at the DAS Office of Procurement web site.
- f. ODMH should involve the DAS Office of Procurement Services in the initial stages of preparing the purchase request to allow the DAS Office of Procurement Services sufficient time to determine if the purchase can be made through its office. Failure to do so could result in the DAS Office of Procurement Services denying the request thereby causing a delay in filling the need.
- g. Special Notes:
  - i. The Release and Permit must be obtained (when needed) prior to the purchase. If the purchase is made prior to receiving the Release and Permit and the Release and Permit is denied, the person who authorized the purchase may be held personally liable for the purchase.
  - ii. All requests seeking approval from the Controlling Board will require a Release and Permit from the DAS Office of Procurement Services or from the DAS Office of Information Technology.
  - iii. All purchasing opportunities that will be completed using Direct Spending Authority in amounts equal to or greater than \$25,000.00 and all Personal Service Contract items are required to be posted to the DAS Office of Procurement web site of procurement opportunities at <http://procure.ohio.gov/proc/searchProcOpps.asp>.

The posting information is sent electronically to the ODMH Purchasing Coordinator, who will then upload the information to the web portal. Questions regarding posting to the web portal may be directed to the ODMH Purchasing Coordinator located within Central Office in the Office of Fiscal Administration.

- iv. All purchases in which the vendor presents paperwork for signature must never be signed unless and until the ODMH Office of Legal Services has reviewed and approved the documentation.

#### D. Procedures for Making Direct Purchases

##### 1. Direct Purchases of \$500 or less:

- a. For purchases with a value of \$500 or less, the ODMH requestor will obtain a minimum of two verbal quotations. The office seeking the quotes shall keep a log journalizing the suppliers contacted, the person spoken with, the supplies or services sought, and the price given. This log shall also include space to document reasons for not awarding to a lower priced bidder, when applicable.
- b. When it is not cost effective or practicable to obtain two quotes, written supervisor approval must be obtained and evident on the purchase request prior to the purchase being made. For common purchases, prices from other suppliers should be periodically sought and reviewed to ensure the best price is obtained and maximum competition is generated.

##### 2. Direct Purchases above \$500:

###### a. Quotations

- i. For purchases above \$500, the ODMH requestor will obtain a minimum of three written quotations and will maintain a record of the suppliers contacted, the quoted price and the supplier selected. Should the supplier selected not be the supplier offering the lowest quote, the requestor shall note the reason for its selection of the higher priced supplier. ODMH requestors should periodically seek prices from other suppliers to ensure that the best price is obtained and that maximum competition is generated. Record of all written quotations related to a specific purchase should be maintained with the corresponding Request to Purchase and subsequent Purchase Order or Payment Card Log. Should a vendor be non-responsive to a request to a quotation, documentation of the non-responsiveness must be provided in lieu of the quotation.
- ii. When ODMH determines that it is not possible or not advantageous to the State to select a supplier based upon lowest cost, a supplier may be selected using a Request for Proposal (RFP) or similar process. To properly use the RFP process, consult sections 125.07 and 125.071 of the Revised Code and rule 123:5-1-08 of the Administrative Code. For additional information, please refer to the State of Ohio Procurement Handbook for Supplies and Services ([http://procure.ohio.gov/pdf/PUR\\_ProcManual.pdf](http://procure.ohio.gov/pdf/PUR_ProcManual.pdf)).
- iii. Unless reduced to writing, an agreement for the sale of supplies or services for an amount of \$500 or more is not enforceable in Ohio or the USA. The written agreement must contain an identification of the supplies or services, the price, the parties to the agreement and the signature of the party against whom enforcement is sought.
- iv. All purchases equal to or greater than \$1,000 in aggregate require the approval of the Appointing Authority and Director notification:

- a. All Central Office requests in the amount of \$1,000 or more require Director pre-approval. The ODMH Purchasing Coordinator in the Office of Fiscal Administration coordinates this process for Central Office after receiving the purchase request, but prior to OAKS entry.
- b. The Office of Support Services submits requests for purchase in the amount of \$1,000 or more to the ODMH Purchasing Coordinator, who then coordinates the approval process within Central Office. Upon approval, the ODMH Purchasing Coordinator notifies the Office of Support Services approval has been granted and the purchase may be completed.
- c. All hospitals are required to submit requests in the amount of \$1,000 or more to the attention of the ODMH Purchasing Coordinator no later than 10:00 am every Thursday. The ODMH Purchasing Coordinator will then compile the information received from Central Office and each hospital into one weekly report for the Director.

b. Requests to Purchase:

- i. All purchases above \$500 require completion and submission of the State of Ohio Department of Mental Health Request to Purchase (Form GEN-1038) which may be found on the Forms page of the ODMH Intranet. In order for the form to be considered complete, the following fields are required:
  - a. Ordered by and Date
  - b. Approved by and Date
  - c. Ship to
  - d. Suggested Vendor
  - e. Vendor Contact and Phone Number
  - f. MBE/EDGE designation
  - g. Contract Number (if purchasing from a contract)
  - h. Release and Permit Number
  - i. Controlling Board Number
  - j. IT Matrix Number (if an IT-related purchase)
  - k. OAKS Vendor ID and Address Sequence
  - l. OAKS Coding
  - m. Quantity Ordered
  - n. Unit (each, hours, cases, etc.)
  - o. Item Description, Specifications, and Justification

- p. Unit Cost
  - q. Total Cost
  - r. Grand Total
- ii. Once completed and approved by the appropriate management representative, the Request to Purchase is forwarded to the appropriate Business Office for further processing.
  - iii. Any questions regarding the completion of the State of Ohio ODMH Request to Purchase form may be directed to the ODMH Purchasing Coordinator located within Central Office in the Office of Fiscal Administration.
3. MBE Set Aside Competition
- a. When using direct purchasing authority, ODMH is required to select a number of purchases for competition by MBEs only. The aggregate value of the set aside purchases will equal approximately 15 percent of the total purchases of supplies and services for the fiscal year. When exercising direct purchasing authority, the requesting office shall definitively mark all purchasing documents to show only MBE vendors were contacted for price quotes. Each requesting office will also monitor set asides quarterly and adjust your projections and selections as necessary. ODMH purchases from DAS term contracts that have been set aside may be considered in the ODMH 15 percent goal. However, using an MBE vendor on a DAS open market bid is considered MBE participation and not MBE set aside.
  - b. It is important for each requesting office to evaluate the impact of the set aside selections. For each contract to be set aside, the following should be considered:
    - i. All product/service categories may not have certified MBEs available to compete for the need. Check the listing of certified MBEs maintained by the DAS Equal Opportunity Division (EOD) prior to selecting the item for set aside.
    - ii. Do not repeatedly select an entire product category for set aside (e.g., all of the contracts for the purchase of shoes, etc.). Consider various categories of products/services and then alternate setting them aside.
    - iii. Do consider contract incumbency or longevity (e.g., who has held the contract for the last ten years) and its impact on both minority and majority firms.
    - iii. Consider dividing contracts or purchases into smaller contracts or multiple contracts in order to allow small businesses to compete.
  - c. All ODMH Requests to Purchase utilizing direct spending authority are required to have the MBE/EDGE Purchasing Worksheet attached to show evidence of MBE vendor consideration.
  - d. Check the listing for MBE certified vendors at the DAS web site <http://eodreporting.oit.ohio.gov/searchMBE.aspx>. More information regarding the MBE program may be found at the DAS Equal Opportunity web site (<http://das.ohio.gov/Divisions/EqualOpportunity.aspx>).

#### 4. EDGE Purchases

- a. ODMH is required to participate in a contract assistance program called the Encouraging Diversity, Growth, and Equity (EDGE) Program. EDGE establishes procurement goals by comparing contractor availability to contractor utilization for eligible expenditures. The initial goal is to award five percent of all contracts for supplies, services, information technology, and construction to EDGE participants.
- b. EDGE further requires ODMH and every other cabinet-level state agency, within the constraints of statutory authority and as otherwise provided by law, to:
  - i. Take appropriate steps to foster, support and encourage the participation of underutilized businesses and encourage such businesses to compete for construction contracts and the procurement of goods and services by including a participation goal for construction contracts and requests for proposals when subcontractors or sub-consultants are used.
  - ii. Review its projected annual procurements to determine, based on EDGE program participant availability, which procurements will be designated as eligible for EDGE. Once participation goals are established, monitor and report program compliance to DAS.
  - iii. Examine its internal agency procurement policies, procedures and practices and remove those elements that adversely impact small and minority-owned or women-owned businesses.
  - iv. Examine and eliminate all unnecessary barriers to equitable participation, including, but not limited to, the following items: bonding and licensing requirements, excessive experience requirements, massive procurements (unbundling contracts when practicable), use of proprietary specifications and other procurement-related requirements.
  - v. Set a goal that approximately five percent of eligible direct expenditures in the areas of construction, architecture/engineering, professional services, goods and services, and information technology services is awarded to EDGE program participants.
  - vi. Provide the DAS Equal Opportunity Division with quarterly reports and annual projections on EDGE utilization.
- c. All ODMH Requests to Purchase utilizing direct spending authority are required to have the MBE/EDGE Purchasing Worksheet attached to show evidence of EDGE vendor consideration.
- d. Check the listing for EDGE certified vendors at the DAS web site <http://eodreporting.oit.ohio.gov/searchEDGE.aspx>. More information regarding the EDGE program may be found at the DAS Equal Opportunity web site <http://das.ohio.gov/Divisions/EqualOpportunity.aspx>.

#### 5. Payment Card Purchases

- a. Authorized payment cardholders may use their payment cards for approved purchases. Payment cards may also be used to make purchases from selected DAS term contracts and state term schedules up to \$2,500 as noted on the contract or schedule.
- b. All Central Office and Office of Support Services payment card purchases equal to or greater than \$1,000 require the approval of the Director. All hospital payment card purchases equal to or greater than \$1,000 require the approval of the Appointing Authority as well as Director notification. The approval process for purchases equal to or greater than \$1,000 may be found in paragraph (D)(2)(iv).
- c. ODMH should authorize payment for supplies and services only when delivered and received (as opposed to the moment the order is placed). Full payment may only be authorized once all supplies or services have been received.
- c. Additional information regarding ODMH payment card purchases may be found by referencing ODMH document AF-13 "Guideline for Proper Usage, Documentation, and Approval of Payment Cards." Further information may be obtained by referencing the State of Ohio Payment Card Policies and Procedures Manual which may be found in the Payment Card section of the OBM Electronic Commerce web site (<http://obm.ohio.gov/SectionPages/ElectronicCommerce/>).

## 6. Emergency Purchases

- a. Law defines an emergency situation as one which creates a threat to public health, welfare, safety or other such reasons as proclaimed by the Governor. Examples of these types of emergencies in Ohio could include, but are not limited to: floods, ice/snow storms, tornado damage, radiation leaks, pandemics or acts of terrorism. When these events occur in Ohio and damage is far-reaching and severe, they are usually followed by an emergency declaration by the Governor and/or the President of the United States. Special provisions are set forth in section 125.023 of the Revised Code to permit ODMH and other agencies to make emergency purchases to resolve situations that have impacted the agency. The Ohio Emergency Management Agency (OEMA) is responsible for coordinating emergency response activities during a declared emergency. ODMH should follow the processes for seeking quotations as set forth in this policy to make necessary purchases. When a formal declaration is issued, the repairs may be eligible for reimbursement by the Federal Emergency Management Agency (FEMA). FEMA does require that purchases be competed and that accurate and detailed records be maintained to qualify for reimbursement. More information about FEMA reimbursement is available from Ohio Emergency Management website (<http://ema.ohio.gov/MitigationRecoveryGrantsMainPage.aspx>).
- b. A second type of emergency may be due to a situation that has developed at an ODMH location and that can cause disruption of daily activities (e.g., breakdown of a boiler, HVAC system or security system, localized fire or weather damage, etc.). The ODMH location should follow the processes for seeking quotations as set forth in this policy to make the purchase. When the amount of the emergency purchase exceeds direct purchase limitations, a Release and Permit must be obtained from the DAS Office of Procurement Services. When the amount of the purchase exceeds the cumulative purchase threshold, approval must be obtained from the Controlling Board. Release and Permits and/or Controlling Board approval must be obtained prior to making the purchase. However, when the emergency need occurs during non-business hours and the ODMH location has exhausted all efforts to contact the Controlling Board or the DAS Office of Procurement Services, the ODMH location may proceed with the purchase and

then forward documentation to the DAS Office of Procurement Services and the Controlling Board on the next regular business day.

7. In State and Domestic Preferences

- a. ODMH must give preference to supplies and services produced or manufactured in the United States and/or in Ohio.
- b. When obtaining quotations, the purchaser should request information as to the point of manufacture and location of the supplier.
- c. Application of the preferences should be in accordance with current Office of Procurement Services policy (PUR-003) as published in the State of Ohio Procurement Handbook for Supplies and Services ([http://procure.ohio.gov/pdf/PUR\\_ProcManual.pdf](http://procure.ohio.gov/pdf/PUR_ProcManual.pdf)).

E. Miscellaneous

1. Disclosure of Location of Services and Data

- a. On contracts for services, ODMH must require contractors to disclose each of the following:
  - i. The location(s) where all services will be performed;
  - ii. The location(s) where any state data applicable to the contract will be maintained or made available;
  - iii. The location(s) where any state data applicable to the contract will be maintained or made available; and
  - iv. The principal location of business for the contractor and all subcontractors.
- b. During the performance of the contract, the contractor must not change the location(s) of the country where services are performed or change the location(s) of the country where the data are maintained or made available without prior written approval of ODMH.
- c. Disclosure is not required for site-specific service contracts in which there are no state data (i.e., laundry service, pest control, and food service).

2. Unresolved Findings for Recovery Verification

- a. ODMH is prohibited from awarding a contract to any company against whom the Auditor of State has issued a finding for recovery if the finding for recovery is "unresolved" at the time of the award. This prohibition applies to competitively awarded contracts exceeding \$25,000, and to those contracts for which the selected company received at least \$50,000 in compensation the previous fiscal year.
- b. The ODMH requestor will go to the Auditor of State Findings for Recovery (<http://auditor.state.oh.us/resources/findings/default.htm>) web site and click on "Certified Search." Enter the potential awardee's individual name and/or organization name to determine if there are any unresolved findings for recovery against that individual or

organization. The ODMH requestor is also required to check the Auditor of State database when renewing contracts under direct authority.

- c. Once the database is checked and a contract is successfully awarded, the ODMH requestor does not have to check the database before processing transactions against the contract. This includes transactions made by purchase order, credit card, or any purchases from DAS term contracts. This prohibition does not apply to
    - i. Employment contracts;
    - ii. Bonding companies
    - iii. Medicaid provider agreements;
    - iv. Contracts where federal law dictates that a person is eligible for the contract.
  - d. Other exceptions may apply. For more information regarding the findings for recovery database, please visit the Auditor of State Findings for Recovery (<http://auditor.state.oh.us/resources/findings/default.htm>) web site or call 800-282-0370.
3. Suspensions and Debarments
- a. ODMH is prohibited from awarding a contract for supplies or services, funded in whole or in part with federal and/or state funds, to a person who appears on any debarment list.
  - b. Agencies may view the Federal List of Excluded Parties Listing System (see the "Search -Current Exclusions" section on the web page at <https://www.epls.gov/>) and the Ohio Department of Transportation debarred list (see the link on the web page at <http://www.dot.state.oh.us/Divisions/ContractAdmin/Pages/default.aspx>). ODMH is required to check these systems before awarding a contract involving state and/or federal funds.
4. Declaration of Material Assistance (DMA)
- a. All suppliers doing business with the state of Ohio are required to complete the Declaration of Material Assistance form before they may be awarded a contract with a value greater than \$100,000.
  - b. ODMH should either obtain this certification from the supplier directly or may review the central log maintained by OBM. This log may be viewed at the OBM web site: <http://obm.ohio.gov/MiscPages/DMA/>.
5. Quotations should be F.O.B. Destination, Freight Prepaid. F.O.B. Destination places the cost and risk of loss during transportation on the supplier. Freight prepaid requires the supplier to include freight in the cost of the product.
6. Purchases of like items are not to be split to avoid competitive selection by ODMH, the DAS Office of Procurement Services, or waiver of competitive selection by the Controlling Board.
7. The definition of "Purchase" includes rental, lease and lease purchase agreements. ODMH personnel should be very cautious when asked to sign procurement related documents by a supplier, as these documents may contain terms and conditions that are not in the best interest of the state of Ohio. At no time shall an ODMH employee sign additional

procurement documents on a purchase made from a DAS contract unless DAS expressly approves the additional documents, in writing.

8. ODMH shall follow processes set forth by OBM and DAS when entering purchase requisitions, orders, invoices and related documents into the Ohio Administrative Knowledge System (OAKS), which is the State of Ohio's central procurement and accounting system.
9. All suppliers are required to complete an affirmative action plan prior to being awarded a contract. There are no exceptions to this requirement. Suppliers should be directed to the DAS Equal Opportunity web site at:  
<http://das.ohio.gov/Divisions/EqualOpportunity/AffirmativeActionEqualEmploymentOpportunity.aspx>.

#### 10. Ohio Ethics

- a. Any ODMH employee involved with making a procurement and any supplier actively doing business with or seeking to do business with the agency are responsible for reviewing and complying with all relevant provisions of sections 102.01 to 102.09 of the Revised Code. When using direct purchase authority, it is the responsibility of the ODMH employee to make the supplier aware of these laws. It is recommended by DAS that ODMH consider the following certification for all purchases:

- b. "The supplier, by acceptance of the purchase order, certifies (1) it has reviewed and understands Ohio ethics and conflict of interest laws, and (2) it will take no action inconsistent with those laws and this purchase order. The supplier understands that failure to comply is, in itself, grounds for termination of the contract and may result in the loss of other contracts with the state of Ohio up to and including debarment.

Supplier certifies that it is currently in compliance and will continue to adhere to the requirements of Ohio ethics laws."

- c. When purchasing supplies and services that amount to \$500 or more, the ODMH agent must require the vendor to certify that it is in compliance with the requirements of Ohio ethics and campaign contribution laws.
- F. Questions regarding this guideline may be directed to the Agency Procurement Officer within the Office of Fiscal Administration.
  - G. This policy supersedes any previously issued directive or policy and will remain effective until canceled or superseded.

**Ohio Department of Mental Health**

**Document Number: AF-13**

**Type of Document: Guideline**

**Authority Source: State of Ohio Financials Manual; State of Ohio Payment Card Policies and Procedures Manual; DAS Purchasing Guidelines; Procurement Procedures for Supplies, Services and Information Technology (DAS Directive 09-21, aka GS-D-12); Agency Plan**

**Document Title: Guideline for Proper Usage, Documentation, and Approval of Payment Cards**

**Applicability Statement: All Employees**

**Exceptions if Applicable: None**

**Effective Date: 4-12-2011**

**Replaces: New**

**Directed To: All DMH Employees**

**Distributed By: Office of Fiscal Administration**

**Guideline for Proper Usage, Documentation, and Approval of Payment Cards**

A. Purpose.

This guideline establishes procedures for employees within the Ohio Department of Mental Health (ODMH) who are involved in the use of the State of Ohio payment card for the procurement of goods and/or services. It complies with the State of Ohio Office of Budget and Management (OBM) Payment card Policies and Procedures Manual, Department of Administrative Services (DAS) Directive 09-21 (aka GS-D-12), (Procurement Procedures for Supplies, Services and Information Technology), ODMH Policy AF-09, "Procurement Procedures for Supplies, Services, and Information Technology", and the ODMH Agency Payment Card Plan.

B. Definitions.

1. "Agency Payment Card Administrator" means the function assigned to the Manager of Fiscal Operations and Community Funding Services. The Agency Payment Card Administrator coordinates the payment card process for the agency and ensures that internal controls are in place and are operating as designed.
2. "Assistant Agency Payment Card Administrator" means the function assigned to the Supervisor of the Fiscal Services Business Office. The Assistant Agency Payment Card Administrator coordinates the overall management of the agency's transaction processing and acts as the Agency Payment Card Administrator in his/her absence.
3. "Cardholder Supervisor" means the cardholder's direct supervisor or other supervisory staff designated by management.

4. "Payment Card Coordinator" means the local payment card administrator at each ODMH location and is usually located within the Business Office.
5. "Payment Cardholder" means the person who is assigned a payment card. All Payment Cardholders must be current full-time or part-time permanent employees of the State of Ohio.
6. "Payment Card Log" (form DMH-FIS-072, available at the Intranet forms site) means the log utilized agency-wide. It provides a detailed description of each purchase and is used to process invoices, reconcile accounts, and assign the Ohio Administrative Knowledge System (OAKS) Account Codes.
7. "Payment Card Transaction Approver" means the person assigned to approve payment card invoices for payment.
8. "Statewide Payment Card Administrator" means the person within OBM responsible for managing the State of Ohio's Payment Card Program.

C. Responsibilities.

1. Agency Payment Card Administrator. The Agency Payment Card Administrator is responsible for the implementation and coordination of the Payment Card process for the agency. In addition, the Agency Payment Card Administrator will:
  - a. File an Agency Plan with OBM.
  - b. Approve, deny, or revoke payment cards as necessary, forwarding the appropriate documentation to the Statewide Payment Card Administrator.
  - c. Ensure a standard form and related departmental procedures are utilized and followed by all individuals involved in the payment card process including document retention. These records at a minimum shall include the log of all purchasing activity, related price quotations (as applicable), and receipts for all purchases.
  - d. Establish reconciliation procedures and internal controls, ensure they are in place and function as designed, and notify OBM of any weakness noted.
2. Assistant Agency Payment Card Administrator. The Assistant Agency Payment Card Administrator is responsible for maintaining the "Agency Plan" and the "Guideline for Proper Usage, Documentation, and Approval of Payment Cards" as requested by the Agency Payment Card Administrator. In addition, the Assistant Payment Card Administrator will:
  - a. Forward announcements of payment card training sessions to each location for Payment Card Coordinators, Payment Cardholders, Cardholder Supervisors and Cardholder Approvers.
  - b. Ensure the appropriate payment card forms (Payment Card Application, Payment Card Agreement, and Payment Card Cardholder Information form) are complete and correct prior to forwarding to the Agency Payment Card Administrator for approval.
  - c. Coordinate the reconciliation of the payment card transactions and test of internal controls department-wide on a monthly basis.

- d. Assist the Agency Payment Card Administrator in the need identification of any additional payment card issuance.
  - e. Perform any payment card-related duties as identified by the Agency Payment Card Administrator.
3. Payment Card Coordinator. The Payment Card Coordinator at each location will:
- a. Familiarize him/herself with the "Agency Plan," the State of Ohio Financials Process Manual," the "State of Ohio Payment Card Program Policies and Procedures Manual," the DAS purchasing guidelines, and this guideline.
  - b. Implement and administer the payment card program, including following this guideline, at his/her location ensuring compliance.
  - c. Coordinate the issuance and cancellation of cards at his/her respective location.
  - d. Ensure proper maintenance of payment card logs and supporting documentation.
  - e. Ensure timely resolution of vendor problems. Any unresolved problems or issues between the vendor and the Department will be referred to the Agency Payment Card Administrator or his/her designee.
  - f. Complete monthly payment card reconciliation for each Payment Cardholder at his/her location.
4. Payment Cardholder. Payment Cardholders are identified at each ODMH location and determined based upon purchasing needs. A Payment Cardholder cannot be a Cardholder Supervisor or a Payment Card Transaction Approver. Payment Cardholders shall:
- a. Make purchases in accordance with the "Agency Plan," the "State of Ohio Financials Process Manual," the "State of Ohio Payment Card Program Policies and Procedures Manual," the DAS purchasing guidelines, and this guideline.
  - b. Safeguard the payment card and payment card number. Use of the payment card is limited to the state employee whose name appears on the face of the card.
  - c. Obtain written approval from management for all purchase requests. The form of the written approval will be at the discretion of the Payment Cardholder's management.
  - d. Forward the approved payment card log to the Cardholder Supervisor and on to the Payment Card Transaction Approver within five business days of the date the transaction was entered into OAKS. This is to take a total of no more than five business days from the date of transaction to the date of transaction approval in OAKS.
  - e. Notify the bank and the respective Payment Card Coordinator of any disputed transactions immediately. The Payment Cardholder will complete a US Bank Transaction Dispute Form and fax it to US Bank. The payment card coordinator will dispute the charge within OAKS. Examples of disputed charges are charges for items not yet shipped and/or received, incorrect charge amounts, or unauthorized charges.

5. Cardholder Supervisor. This person has the responsibility of reviewing daily, weekly, and monthly payment card log entries to ensure the appropriateness of the Payment Cardholder's payment card activities. A Cardholder cannot be a Payment Cardholder or a Payment Card Transaction Approver. The Cardholder Supervisor will:
    - a. Periodically verify the Payment Cardholder has the payment card in his/her possession.
    - b. If the Payment Cardholder's card is lost or stolen, the Payment Cardholder should contact US Bank immediately at 1-800-344-5696. Both the Cardholder Supervisor and Payment Card Coordinator should also be notified immediately after the call to US Bank.
    - c. Periodically review the purchasing process with the Payment Cardholder to verify the requisite written approval was received prior to using the payment card to make a purchase.
    - d. Ensure any problems related to the purchasing and expenditure activity on a payment card are resolved.
    - e. Cooperate with the Payment Card Coordinator and/or Agency Payment Card Administrator to resolve problems and implement new payment card procedures as needed.
  6. Payment Card Transaction Approver. The Payment Card Transaction Approver approves the payment card invoices (transactions) within the OAKS. This individual is a business office employee with knowledge of the OAKS voucher processing procedure. There is at least one payment card transaction approver at each ODMH location. A Payment Card Transaction Approver may not be a Payment Cardholder or a Cardholder Supervisor. Payment Card Transaction Approvers will:
    - a. Reconcile each payment card transaction before payment is processed through OAKS, ensuring that the charge in OAKS matches the payment card log and receipts.
    - b. Maintain a separate file of payment card logs and associated documentation for each payment card by Payment Cardholder.
    - c. Notify the Payment Card Coordinator when he/she will be absent or unable to process payment card transactions for any reason so alternate arrangements may be made.
- D. Issuance of the Payment Card.
1. The Statewide Payment Card Administrator notifies the Agency Payment Card Administrator and the Assistant Agency Payment Card Administrator of upcoming OBM payment card training.
  2. The Assistant Agency Payment Card Administrator notifies the Payment Card Coordinators at each location of the upcoming OBM payment card training.
  3. The Payment Card Coordinator determines if anyone at his/her location requires payment card training. All Payment Cardholders are required to attend the OBM payment card training prior to receiving a payment card. In addition to the Payment

Cardholder, the following are required to attend training prior to taking part in the payment card process:

- a. Agency Payment Card Administrator;
  - b. Assistant Agency Payment Card Administrator;
  - c. Payment Card Coordinator;
  - d. Cardholder Supervisor; and
  - e. Payment Card Transaction Approver.
4. Upon completion of OBM payment card training, the Payment Card Coordinator notifies the Assistant Payment Card Administrator or his/her designee to have the payment card issued via email. Attached to the email are the following forms:
    - a. State of Ohio Payment Card Application;
    - b. State of Ohio Payment Card Program Cardholder Agreement; and
    - c. US Bank State of Ohio Cardholder Information Form.
  5. The Assistant Agency Payment Card Administrator or his/her designee reviews the forms, obtains any additional information required, and obtains signature approval from the Agency Payment Card Administrator.
  6. The Assistant Agency Payment Card Administrator or his/her designee forwards the payment card forms to the Statewide Payment Card Administrator who secures the card from US Bank provided final approval of payment card issuance is granted. Once received, the Statewide Payment Card Administrator mails the card to the Assistant Agency Payment Card Administrator.
  7. The Assistant Agency Payment Card Administrator then forwards the payment card to the appropriate Payment Card Coordinator, who then forwards it to the individual Payment Cardholder.
  8. The Payment Cardholder then activates the payment card following the instruction enclosed with the newly issued payment card.
- E. Use of the Payment Card.
1. Before purchasing goods, the Payment Cardholder must have written approval to make the purchase.
  2. The Payment Cardholder then determines if the item is available from any of the following required State sources of supply (in order of ranking):
    - a. Ohio Penal Industries (OPI);
    - b. DAS Office of Procurement from Community Rehabilitation Programs (OPCRP);
    - c. Rehabilitation Services Commission (RSC), Bureau of Services for the Visually Impaired;
    - d. Department of Mental Health, Office of Support Services;

- e. DAS Office of State Printing; or
  - f. DAS Office of Procurement Services (State Term Contracts).
3. If the Payment Cardholder determines goods are available through any of the State Sources of Supply, with the exception of State Term Contracts, the goods must be purchased through the listed source of supply. The payment card cannot be used and a Request to Purchase is completed. The request is then routed through the normal purchasing process.
  4. If the Payment Cardholder has determined there is a State Term Schedule or contract available, the language is referenced to determine if payment card use is acceptable. If so, the payment card may be used. Most new state term contracts include language for the use of the payment card for transactions below \$2,500.
  5. If the goods are not available through any of the State Sources of Supply, the Payment Cardholder must determine if there are bio-based products available. If a bio-based item is available and not used, a waiver must be requested including full justification for non-use of the bio-based product and approved prior to proceeding with the purchase of a non-bio-based item.
  6. If there are no bio-based products available, then the Payment Cardholder may complete the purchase on the open market within the spending limits of the payment card (\$2,500 single item purchase limit and \$15,000 monthly spending limit) and in accordance with the DMH purchasing guideline keeping in mind the Agency's Minority Business Enterprise (MBE) requirements (see ODMH policy AF-09, "Procurement Procedure for Supplies, Services, and Information Technology"). The Payment Cardholder should make every effort to ensure the department is purchasing quality goods at the lowest cost. Evidence of the required price quotations and consideration of MBE/Encouraging Diversity, Growth and Equity (EDGE) vendors shall be attached to the payment card log.
  7. The Payment card may also be used to purchase certain services. The Payment card can only be used for OBM-approved service vendors. Approved service vendors should be verified by checking the vendor's profile in OAKS or on the OBM Ohio Payment Card Approved Service Vendor List.
  8. Once the vendor has been determined, the Payment Cardholder purchases the goods and/or services and documents the purchase as required on the payment card log (form DMH-FIS-072). Internet purchases may be made only at secure web sites and only if the payment card numbers will be encrypted.
  9. Employee awards cannot be purchased with the payment card.
  10. Payment Cardholders will maintain the payment card logs, receipts, price quotations, confirmation of receipt of goods, and other supporting documentation for all payment card purchases. The log provides a means for account reconciliation and shall provide a detailed description of each purchase. This assists anyone involved in the payment card process in understanding what was purchased and also aids in the proper assignment of OAKS Account Codes by the Payment Card Transaction Approver.
  11. Payment Cardholders will forward copies of logs, receipts and supporting documentation to their Cardholder Supervisor for approval. In the event a Payment Cardholder is unable to complete his/her payment card log, the Payment Card Coordinator must notify the Agency Payment Card Administrator or his/her designee

with the circumstances behind the Payment Cardholder's inability. The Agency Payment Card Administrator will provide the Payment Card Coordinator specific instructions on how to resolve the individual issue.

12. The Payment Cardholder, Cardholder Supervisor, and Payment Card Transaction Approver must work together to ensure the payment card transaction for each purchase is processed within five business days of the OAKS invoice (transaction) date. Failure to process the transaction within five business days may ultimately subject the Payment Cardholder to suspension and/or revocation of the payment card.
13. The Cardholder Supervisor reviews the payment card log and attached documentation to ensure:
  - a. The appropriateness of each purchase;
  - b. All purchasing guidelines were correctly followed;
  - c. All requisite documentation is attached; and
  - d. All purchases have written approval prior to the acquisition having taken place.
14. The Cardholder Supervisor then signs and dates the payment card log to indicate approval of the listed purchases.
15. The Cardholder Supervisor then forwards the payment card log to the Payment Card Transaction Approver.
16. The Payment Card Transaction Approver reconciles each payment card log before OAKS payment processing by comparing the payment card log, attached receipts, and supporting documentation to the information on the OAKS Procurement Card Reconcile Statement screen.
17. The Payment Card Transaction Approver then ensures the pricing reflected on the payment card log is correct and verifies confirmation of receipt of goods as evidenced by the Payment Cardholder.
  - a. In the event the OAKS transaction is not the same as the recorded transaction, or there is a duplicate charge for the transaction, the Payment Card Transaction Approver must file a dispute with both the bank and within OAKS.
  - b. A copy of the disputed transaction is forwarded to the Agency Payment Card Administrator.
  - c. The Payment Card Coordinator will monitor and track the dispute until resolved.
18. The Payment Card Transaction Approver assigns and records the OAKS expense account code for each transaction on the log and then processes each invoice for payment in OAKS as received ensuring all invoices are paid within five days of the date the transaction was electronically uploaded into OAKS. Transactions made with an MBE or EDGE vendor must be flagged as such in OAKS.
19. Encumbrances will not be referenced. Any credits must be processed with a debit for the same Payment Cardholder on the same business day.

20. The Payment Card Transaction Approver records the voucher number on the payment card log for each transaction.
21. Upon completion of the transaction, the Payment Card Transaction Approver signs and dates the payment card log indicating the action is complete and the transaction has been posted.
22. The Payment Card Transaction Approver then files the payment card log by Payment Cardholder in the designated location.

F. Payment Card Override Request.

1. If the Payment Cardholder tries to make a purchase using the payment card and the payment card is declined, it is possible the transaction exceeds the designated daily and/or monthly transaction limit OR the purchase is being made from a vendor with a blocked merchant category code.
2. When the card is declined at the point-of-sale, the Payment Cardholder will make an inquiry with the bank by calling 1-800-344-5696.
3. If the card is declined for exceeding the transaction limit and the purchase is an immediate need:
  - a. The Payment Cardholder will notify the Agency Payment Card Administrator supplying his/her name and Employee ID, account number, vendor name, and transaction amount.
  - b. The Agency Payment Card Administrator will determine if this is an appropriate purchase. If so, he/she will notify the Statewide Payment Card Administrator and request a temporary increase in spending level.
    - i. If granted, the Agency Payment Card Administrator will notify the Payment Cardholder who will then proceed with the purchase.
    - ii. If not approved, the Payment Cardholder cannot proceed with the purchase. Either another Payment Cardholder may make the purchase or a different method of purchasing must be utilized.
4. If the card is declined for a blocked merchant category code and it is believed the incorrect category code has been applied:
  - a. The Payment Cardholder will notify the Agency Payment Card Administrator supplying his/her name and Employee ID, account number, vendor name, and transaction amount.
  - b. The Agency Payment Card Administrator will determine if this is an appropriate purchase. If so, he/she will request a manual override via an email to US Bank.
  - c. US Bank will, if approved, notify the Agency Payment Card Administrator via email that the manual override was successfully applied.
  - d. The Agency Payment Card Administrator will notify the Payment Cardholder that the manual override was successfully applied and will provide the phone number the merchant may call to obtain the override authorization code.

- e. The Payment Cardholder will convey the telephone number to the merchant who will then call the bank and obtain the authorization number and subsequently complete the transaction.

#### G. Payment Card Suspension and Revocation.

1. The Assistant Agency Payment Card Administrator monitors aging payment card transactions and will notify the appropriate Payment Card Coordinator should transactions of a Payment Cardholder appear on the Reconcile Statement page that are ten days or older and not in dispute. The transaction is then expected to be processed and either paid or disputed.
2. Should a transaction remain on the Reconcile Statement page for fifteen or more days, the associated payment card will be suspended until the transaction is processed.
3. The following tiered approach has been implemented by the Agency Payment Card Administrator to deal with transactions not processed within fifteen days:
  - a. The first time a payment card is suspended, the Agency Payment Card Administrator or his/her designee will request immediate processing of the outstanding charge. After confirming the transaction has been processed, the Agency Payment Card Administrator will request the Statewide Payment Card Administrator to reactivate the payment card.
  - b. The second time a payment card is suspended, the payment card will not be reinstated until the associated charge is processed and a written plan is submitted to the Agency Payment Card Administrator detailing the steps being taken to resolve the issue. If the plan is accepted, the Agency Payment Card Administrator will request the Statewide Payment Card Administrator to reactivate the payment card.
  - c. The third time a payment card is suspended the payment card will not be reinstated unless further assurances are made to the Agency Payment Card Administrator that the payment card will be used within the proper guidelines. If the assurances are accepted, the Agency Payment Card Administrator will request the Statewide Payment Card Administrator to reactivate the payment card.
4. Payment cards may be revoked at any time at the sole discretion of the Statewide Payment Card Administrator or Agency Payment Card Administrator, for situations including but not limited to misuse, abuse, or other improper use.

#### H. Payment Card Cancellation Process.

1. When it has been determined a payment card is to be cancelled, the Payment Cardholder will immediately return the payment card to the Payment Card Coordinator who will complete the Cardholder Information form.
2. The Payment Card Coordinator will destroy the payment card and forward the Cardholder Information form to the Agency Payment Card Administrator or his/her designee.
3. The Agency Payment Card Administrator will review and approve the form prior to forwarding the form to the Statewide Payment Card Administrator.

4. The Statewide Payment Card Administrator will then cancel the payment card and notify the Agency Payment Card Administrator that the requested action has been completed.
5. If the Payment Cardholder's card is lost or stolen, the Payment Cardholder should contact US Bank immediately at 1-800-344-5696. Both the Cardholder Supervisor and the Payment Card Coordinator should also be notified immediately after the call to US Bank. The Payment Card Coordinator will notify the Agency Payment Card Administrator, who will then notify the Statewide Payment Card Administrator.

I. Payment Card Fees.

1. Any agency or credit card fee that is not disclosed to the agency shall be disputed immediately regardless of the dollar limit of the fee. Merchants should not be permitted to charge a service fee on the account unless the service fee is disclosed with the Payment Cardholder upfront at the time of the purchase. Should this occur, the Complaint to Vendor (CTV) should be filed with State Purchasing.
2. If an agency fee or credit card fee is disclosed upfront, the allowable dollar limit on the fee is fifteen percent of the total bill, but not to exceed thirty dollars.
3. If there is a contract purchase and payment card language is written in the contract, the vendor is prohibited from charging any additional fees

J. Payment Card Reconciliation.

1. The Payment Card Coordinator will perform a monthly reconciliation of each individual Payment Cardholder's payment card transactions and payment card logs to OAKS on a monthly basis.
2. Upon completion of the payment card transaction reconciliation, the Payment Card Coordinator at each location will email the Agency Payment Card Administrator or his/her designee by the 10<sup>th</sup> working day following the month of reconciliation with the results of the reconciliation:
  - a. The e-mail will indicate the reconciliation was complete for the month of XXX and no discrepancies were found; or
  - b. The e-mail will indicate the reconciliation was complete for the month of XXX and discrepancies were found. The discrepancies would then be detailed within the e-mail.
3. Should there be any discrepancies the Payment Card Coordinator will work with the Agency Payment Card Administrator or his/her designee to resolve the discrepancies.

K. Payment Card Audit Process.

1. OBM will statistically sample and perform a post audit of all DMH procedures, purchases, reconciliation, and approval of the payment card process.
2. In addition to OBM's post audit, each Payment Card Coordinator will establish internal controls to monitor the appropriateness of all transactions.
3. The Agency Payment Card Administrator will also complete periodic payment card process review. For audit purposes, the following documentation must be faxed to the Agency Payment Card Administrator:

- a. Vendor name;
  - b. Date of purchase;
  - c. Description of items purchased;
  - d. Receipts, invoices or packing slips; and
  - e. Payment card logs.
  - f. No excess documentation aside from the preceding items should be faxed/scanned to the Agency Payment Card Administrator unless requested.
4. The Agency Payment Card Administrator will complete the internal review and forward the findings to the respective Payment Card Coordinator.
- L. Questions regarding this guideline may be directed to the Agency Payment Card Administrator within the Office of Fiscal Administration.

# Payment Card Log

Cardholder Name	Cardholder OAKS ID	Agency	Location	From	To
		DMH			

**Note: Please blacken out your credit card number on invoices.**

\* Check One - Type of Vendor

Transaction Date	Phone / Fax Circle One	Vendor Name / Vendor Phone	Description of Purchase Or Return			Amount of Transaction		Date Received or Returned	None = N MBE = M EDGE = E		
			Fund	Account Code	ALI	Department	Program			Grant	Purchase
	<input type="checkbox"/> Yes <input type="checkbox"/> No	Name: Phone:			DMH	DMH	DMH		<input type="checkbox"/> N <input type="checkbox"/> M <input type="checkbox"/> E		
<b>Coding Information:</b>			Fund	Account Code	ALI	Department	Program	Grant	Reporting	Agency Use	Contract Number
						DMH	DMH	DMH	DMH	DMH	
	<input type="checkbox"/> Yes <input type="checkbox"/> No	Name: Phone:			DMH	DMH	DMH		<input type="checkbox"/> N <input type="checkbox"/> M <input type="checkbox"/> E		
<b>Coding Information:</b>			Fund	Account Code	ALI	Department	Program	Grant	Reporting	Agency Use	Contract Number
						DMH	DMH	DMH	DMH	DMH	
	<input type="checkbox"/> Yes <input type="checkbox"/> No	Name: Phone:			DMH	DMH	DMH		<input type="checkbox"/> N <input type="checkbox"/> M <input type="checkbox"/> E		
<b>Coding Information:</b>			Fund	Account Code	ALI	Department	Program	Grant	Reporting	Agency Use	Contract Number
						DMH	DMH	DMH	DMH	DMH	
	<input type="checkbox"/> Yes <input type="checkbox"/> No	Name: Phone:			DMH	DMH	DMH		<input type="checkbox"/> N <input type="checkbox"/> M <input type="checkbox"/> E		
<b>Coding Information:</b>			Fund	Account Code	ALI	Department	Program	Grant	Reporting	Agency Use	Contract Number
						DMH	DMH	DMH	DMH	DMH	
<b>Coding Information:</b>			Fund	Account Code	ALI	Department	Program	Grant	Reporting	Agency Use	Contract Number
<b>Cardholder Signature</b>			Fund	Account Code	ALI	Department	Program	Grant	Reporting	Agency Use	Contract Number
						DMH	DMH	DMH	DMH	DMH	
<b>Transaction Approver Signature</b>			Date	Cardholder Supervisor Signature	Date	Reconciler Signature	Date				

# APPALACHIAN BEHAVIORAL HEALTHCARE

POLICY: B-12

EFFECTIVE DATE: September 23, 1985

REVIEWED DATE: May 24, 2012

SUBJECT: Purchasing

## I. PURPOSE

To establish the guidelines and regulations concerning the procedure for the purchase of supplies and equipment for Appalachian Behavioral Healthcare (ABH).

## II. POLICY

Goods and services are acquired for the use by patients and staff in accordance with all State guidelines established by the Ohio Department of Mental Health, Office of Budget Management and the Department of Administrative Services.

## III. DEFINITIONS

**Direct Purchase** – a purchase made directly by ABH staff in which the good or services needed are not available from any State resources or from any DAS contracts that does not exceed \$50,000 in aggregate or goods and/or services from a single vendor per State fiscal year.

**Emergency Purchase** – there are two types of Emergency Purchases:

1. An emergency situation as one which creates a threat to public health, welfare, safety or other such reasons as proclaimed by the Governor. Examples of these types of emergencies in Ohio could include, but are not limited to: floods, ice/snow storms, tornado damage, radiation leaks, pandemics or acts of terrorism. When these events occur in Ohio and damage is far-reaching and severe, they are usually followed by an emergency declaration by the Governor and/or the President of the United States.
2. A second type of emergency may be due to a situation that has developed and that can cause disruption of daily activities (e.g., breakdown of a boiler, HVAC system or security system, localized fire or weather damage, etc.). ABH employees should follow the processes for seeking quotations as set forth in this policy to make the purchase.

**Encourage Diversity, Growth and Equity Program (EDGE)** – the contract assistance program designed to assist socially disadvantaged and economically disadvantaged businesses in Ohio.

1. Socially Disadvantaged includes those individuals who have at least one objective distinguishing feature that has significantly inhibited their business success such as race, ethnic origin, gender, physical/mental disability, long-term residency in an environment isolated from mainstream Ohio society, located in a qualified census tract or other object relevant reason.

2. Businesses are considered to be economically disadvantaged when the personal network of each owner does not exceed \$250,000 at program entry and personal net worth of each owner must not exceed \$750,000 during program participation.

**Invoice** - An itemized listing showing delivery of the supplies or performance of the services described in the order, and the date of the purchase or rendering of the services, or an itemization of the things done, material supplied, or labor furnished, and the sum due pursuant to the contract or obligation.

**IT (Information Technology) Related Purchases and Non-IT Related Purchases** - there are two types of IT related purchases

1. Non-IT-related – When the purchase exceeds the direct purchase limit and the DAS Office of Procurement Services determines it is not practicable or advantageous for its office to make the purchase, ODMH will be granted a Release and Permit to make the purchase using their direct authority. Purchases \$50,000 and over require both a Release and Permit and Controlling Board approval.
2. IT-related – For IT-related purchases requiring a Release and Permit, ODMH blanket Release and Permit approval may be used up to \$25,000. For IT related purchases over \$25,000 up to \$50,000 requiring a Release and Permit, an Office of Information Technology (OIT) Release and Permit is required (as opposed to the ODMH blanket Release and Permit). Purchases that are not on STS and are \$50,000 and over require both an OIT Release and Permit and Controlling Board approval. All IT Release and Permit purchase approvals are coordinated by the Office of Information Services located in Central Office.

**Minority Business Enterprise (MBE)** – the individual, partnerships, corporation, or joint venture of any kind that is owned and controlled by United States citizens who are residents of the State of Ohio; who are members of one of the following economically disadvantaged groups: Blacks; Native Americans; Hispanics; Asians; and who are certified by the Ohio Department of Administrative Services (DAS), State Equal Opportunity Coordinator.

- A. MBE Participation Purchase means a purchase made through competitive selection on the open market in which an MBE-certified vendor is awarded.
- B. MBE Set-Aside Purchase – means a purchase selected for restricted competition among certified MBE's only.

**Payment Card Purchases** - Purchases of supplies or services made with a state of Ohio Payment Card. Payments for services can only be made to companies on the approved Payment Care Service Vendor List maintained by the Ohio Office of Budget and Management.

**Purchase** - To buy, rent, lease, lease purchase, or otherwise acquire supplies or services. Purchase also includes all functions that pertain to the obtaining of supplies or services, including description of requirements, selection and solicitation of sources, preparation

and award of contracts, all phases of contract administration, and receipt and acceptance of the supplies and services and payment for them.

**Purchase Order** - A purchaser's written document to a vendor formalizing all the terms and conditions of a proposed transaction, such as a description of the requested item(s), delivery schedule, terms of payment, and transportation.

**Request to Purchase** - the electronic form located on the ODMH Intranet which details a specific purchase to include the requestor of the good and/or service, the approver of the purchase of the good and/or service, the suggested vendor and contact information, fund coding, and the detailed specifications of the good and/or service requested. The form is utilized to create an OAKS requisition and subsequent purchase order.

**Requirement Contracts**— Term contracts that are effective for an extended period of time, usually one to three years. There are several categories of term contracts – some are mandatory and some are optional:

- Agency specific contract (ASC) means a mandatory contract addressing the specific needs of a given agency. The contract is available only for the agency listed and includes items such as elevator maintenance and laundry service.
- General distribution contract (GDC) means a mandatory term contract containing popular items utilized by many agencies. GDCs are available to all agencies and include items such as vehicles, gasoline, cut size paper, and clothing.
- Limited distribution contract (LDC) means a mandatory contract addressing specific needs of multiple named agencies. The contract is available to only the named agencies listed on the contract and includes items such as trash removal, housekeeping, and food service.
- Master maintenance agreement (MMA) means an optional contract available for maintenance and service of equipment that is no longer covered under a manufacturer's warranty and is available for computer hardware, software, copiers, vending machines, and other equipment. Services may include remedial maintenance calls and preventative maintenance inspections, but are not to be used to furnish consumables, relocate equipment, or repair damage due to intentional abuse by the customer.
- Multiple award contract (MAC) may be mandatory or optional and include more than one supplier for the same or comparable supplies or services. The contract language must be reviewed to determine whether the contract is mandatory or optional. "State Term Schedule" is a type of contract negotiated between DAS and vendors for use by all state agencies and political subdivisions in which the vendor was required to provide the state with either the manufacturer's Federal GSA pricing or their best commercial pricing.
- State term schedule (STS) means an optional contract for supplies or services. The contracts are price solicitations that include multiple suppliers for similar types of supplies or services. When making a purchase from a STS contract, if there are multiple vendors listed on the STS offering similar or like items,

price quotations are required. The number of quotations required is based upon the number of vendors listed on the STS. If there are only two vendors listed on the STS, two quotations are required. If there are three or more vendors listed on the STS, a minimum of three quotations are required.

**Required State Sources of Supply (Think Ohio First)** – Law requires that first consideration is given to certain state resources prior to making the purchase from another source. Prior to making any purchase, the purchaser must first determine if the supply or service is available from any of the following sources (in order of ranking):

1. Ohio Penal Industries (OPI);
2. DAS Office of Procurement from Community Rehabilitation Programs;
3. Rehabilitation Services Commission (RSC), Bureau of Services for the Visually Impaired;
4. ODMH Office of Support Services;
5. DAS Office of State Printing;
6. DAS Office of Procurement Services.

**Services** - the furnishing of labor, time or effort of a person or company not involving the delivery of a specific end product.

**Vendor** - An entity that sells products, supplies and/or services.

#### IV. IMPLEMENTATION

This policy is effective as of the last revision date.

#### V. REFERENCES

- ODMH Policy AF-09 Procurement Procedures for Supplies, Services and Information Technology (Effective June 2011);

APPROVAL:

---

Jane E. Krason  
Chief Executive Officer

Requested By:

Approved By:

Date:

Deliver To:

Item #	Item	Ordered	Delivered	Item #	Item	Ordered	Delivered
	Letter size hanging folders				Pencil- Black		
	1" Binders				Pen- Black		
	2" Binders				Pen- Red		
	3" Binders				Patient Flex Pen		
	ABH envelopes				Pen- Green		
	Standard white envelopes				Pen - Blue		
	Coin envelopes				Marker - Black		
	6.5x9.5 envelopes				Marker - Red		
	7.5x10.5 envelopes				Marker - Blue		
	10x13 envelopes				Marker - Green		
	10x16.5 envelopes				Highlighter- Yellow		
	12x15.5 Envelopes				Dry Erase Marker- Black		
	Manilla Folders- legal				Dry Erase Marker- Red		
	Manilla Folders- letter				Dry Erase Marker- Blue		
	Smart Labels				Dry Erase Marker- Green		
	2 pocket folders				Dry Erase Eraser		
	copier labels 5353				Binder Clips- Large		
	Sheet Protectors				Binder Clips- Med.		
	A-Z file guide - Legal				Binder Clips- Small		
	A-Z file guide - Letter				Ideal Clamps - Large		
	Insertable Dividers- 5 tab				Ideal Clamps - Small		
	Insertable Dividers- 8 tab				White Out		
	Filing Lables 5866				Paper Clip Caddy		
	A-Z binder dividers				Paper Clip- Standard		
	Report Covers- clear				Paper Clip- Jumbo		
	Post it Notes- 4x6				Eraser- Pencil Cap		
	Post it Notes- 3x5				Log Book		
	Post it Notes- 3 x 3				Hole Punch: 2 hole 3 hole		
	Post it Notes- 1.5x2				Scotch Tape- Standard		
	Index Cards 3x5				Scotch Tape- Large		
	Index Cards 4x6				Pencil Sharpener		
	Index Cards 5x8				Chalk- White		
	Pencil- Red				Glue Sticks		

Received By:

Date:

Requested By:

Approved By:

Date:

Deliver To:

Item #	Item	Ordered	Delivered	Item #	Item	Ordered	Delivered
	Thumb Tacks				Kleenex		
	Glue- Elmers				Flashlight		
	Pushpins				Flashlight Bulb		
	Reinforcement Tabs				Scrub Brush		
	Letter Opener						
	Ruler						
	Chain pen						
	A-Z card guides 4 x 6						
	Scissors- Standard Office						
	Tape Flags						
	Tape Dispenser						
	Calculator						
	Legal Size pad						
	Letter Size Pad						
	6x9 Steno Pad						
	Paper 5x8 Jr. Legal						
	Paper 4x6 scratch pad						
	Paper- Notebooks						
	Staples- Heavy Duty						
	Stapler- Heavy Duty						
	Staples - High capacity						
	Stapler - High capacity						
	Staples- Standard						
	Stapler- Standard						
	Staple Remover						
	Clip Boards						
	8 1/2x 11 Copy						
	Records Storage Box						
	Batteries- AA						
	Batteries- AAA						
	Batteries- C						
	Batteries- D						
	Batteries- 9 Volt						
	Letterhead Paper						

Received By:

Date:



Requested By:		Date:	
Approved By:		Deliver To:	
Item #	Item	Ordered	Delivered
	Medicine Cup 1oz.-Plastic		
	Medicine Cup 1oz.-Paper		
	Adult Diaper-Regular Small		
	Adult Diaper-Regular Med.		
	Adult Diaper-Regular Large		
	Adult Diaper-Regular XL		
	Adult Diaper-Pull Up Small		
	Adult Diaper-Pull Up Med.		
	Adult Diaper-Pull Up Large		
	Adult Diaper-Pull Up XL		
	Underpads		
	Cotton Balls		
	Gauze Sponge 2x2		
	Gauze Sponge 4x4		
	Rolled Gauze 2"		
	Rolled Gauze 3"		
	Rolled Gauze 4"		
	Non-Adherent Pads 2x3		
	Non-Adherent Pads 3x4		
	Non-Adherent Pads 3x8		
	Tongue Depressors		
	Cotton Tipped Applicators		
	Tape-Paper		
	Tape-Cloth		
	Thermometer Covers-Exergen		
	Thermometer Covers-Thermoscan		
	Thermometer Covers-Probe		
	Protective Goggles		
	Sharps Container-XL		
	Sharps Container-8 qt.		
	Sharps Container-Wall Mount		
	Sharps Container-Small		
	Sharps Container-XS		

Received By:

Date:

Item #	Item	Ordered	Delivered
	Wall Mount Sharps Box		
	Respirator		
	Speci-Pan		
	Denture Cup		
	Medical Scissors		
	Super Glue		
	Skin Staple Remover Kit		
	Bed Pan		
	Foot Soak Pan		
	Sitz Bath		
	ABD Pad 8x10		
	Otoscope Covers-Small		
	Otoscope Covers-Medium		
	Otoscope Covers-Large		
	Emesis Basin		
	Alcohol Pads		
	Heating Pad		
	Band-Aids 3/4x3		
	Band-Aids 1x3		
	Band-Aids 2x2		
	Cold Compress		
	Elastic Bandage 2"		
	Elastic Bandage 3"		
	Elastic Bandage 4"		
	Elastic Bandage 6"		
	Slippers-Foam Medium		
	Slippers-Foam Large		
	Slippers-Foam XL		
	Gloves-Small		
	Gloves-Medium		
	Gloves-Large		
	Gloves-XL		





**EXEMPTION CERTIFICATE**  
**Ohio Department of Mental Health**

For use by the State of Ohio, Department of Mental Health, as a political subdivision of the State of Ohio.

Name of Vendor	Date
----------------	------

The undersigned hereby certifies that he/she is authorized to execute this certificate and the article or articles purchased from the above vendor are for the exclusive use of the Department of Mental Health and certifies that this claim is based upon the purchaser's proposed use of the items purchased, the activity of the purchaser, or both, as shown hereon:

(Purchaser must state prescribed reason for claiming exemption or exception.)

**Governmental Tax Exempt Organization**

It is understood that the exception from tax in the case of sale of articles under this exemption certificate to the State of Ohio, etc., is limited to the sale of articles purchased for their exclusive use, and it is agreed that if articles purchased tax free under this exemption certificate are used otherwise or are sold to employees or others, such fact will be reported to the manufacturer of the article or articles covered by this certificate and tax paid by me to the collector of internal revenue for the district in which the sale was made. It is also understood that the fraudulent use of this certificate to secure exemption will subject the undersigned and all guilty parties to a fine of not more than \$10,000 or imprisonment for not more than five years or both, together with costs of prosecution.

This certificate shall continue in force until revoked and shall be considered a part of each order given to the above named vendor unless the order specifies otherwise.

Purchaser's Name	
Purchaser's Activity Mental Health Facility	
Purchaser's Address 100 Hospital Drive, Athens, OH 45701	
Signature Kelly MacPis	Date 1/23/12
Title Chief Operating Officer	
Tax Exempt No. 31-1334820	

# Payment Card Log

Cardholder Name	Cardholder OAKS ID	Agency	Location	From	To
		DMH			

**Note: Please blacken out your credit card number on invoices.**

\* Check One - Type of Vendor

Transaction Date	Phone / Fax Circle One	Vendor Name / Vendor Phone		Description of Purchase Or Return	Amount of Transaction		Date Received or Returned	None = N MBE = M EDGE = E	Voucher Number	
		Name:	Phone:		Purchase	Return				
	<input type="checkbox"/> Yes <input type="checkbox"/> No	Fund	Account Code	ALI	Department	Program	Grant	Reporting	Agency Use	Contract Number
					DMH	DMH	DMH	DMH		
<b>Coding Information:</b>										
	<input type="checkbox"/> Yes <input type="checkbox"/> No	Fund	Account Code	ALI	Department	Program	Grant	Reporting	Agency Use	Contract Number
					DMH	DMH	DMH	DMH		
<b>Coding Information:</b>										
	<input type="checkbox"/> Yes <input type="checkbox"/> No	Fund	Account Code	ALI	Department	Program	Grant	Reporting	Agency Use	Contract Number
					DMH	DMH	DMH	DMH		
<b>Coding Information:</b>										
	<input type="checkbox"/> Yes <input type="checkbox"/> No	Fund	Account Code	ALI	Department	Program	Grant	Reporting	Agency Use	Contract Number
					DMH	DMH	DMH	DMH		
<b>Coding Information:</b>										

Cardholder Signature	Date	Cardholder Supervisor Signature	Date
Transaction Approver Signature	Date	Reconciler Signature	Date

## APPALACHIAN BEHAVIORAL HEALTHCARE

PROCEDURE: B-12A Purchasing  
(Policy B-12 Purchasing)

### I. STEPS

#### A. Identification of Need and Urgency – ABH Storeroom

Monthly Ordering - Designated staff from each Department or Unit will complete the Storeroom Requisition (Attachment A) and forward to Storekeeper during the first week of each month. If a Department (i.e. Communications, Police Department, etc.) orders monthly supplies, the Storekeeper will deliver the supplies to that Department in a timely manner. If a Unit orders monthly supplies, the Storekeeper will deliver them to Room #1307. The Storekeeper will notify the midnight Supervisor via email that the supplies are ready for pickup.

Urgent Ordering - Employee will contact Storekeeper by phone or email and have completed Storeroom Requisition ready. If item is available from the Storeroom, Storekeeper will deliver item to the employee or Department as soon as possible. Employee can also go to Storeroom and meet with Storekeeper to pick up supplies with completed Storeroom Requisition.

#### B. Identification of Need and Urgency – Outside

If the need for an item cannot be fulfilled in-house, the following steps must be followed in order to ensure we are compliant with State of Ohio Purchasing Rules.

1. Prior to making any purchase, the purchaser must first determine if the goods or service is available from any of the following vendors in order of ranking. (See links below - please right click and choose "Open Hyperlink" to access the sites):

1. Ohio Penal Industries (OPI)  
Phone 614-752-0287  
[www.opi.state.oh.us](http://www.opi.state.oh.us)
2. DAS Office of Procurement from Community Rehabilitation Programs  
Phone 614-752-9772  
<http://das.ohio.gov/Divisions/GeneralServices/ProcurementServices/CommunityRehabilitationPrograms/tabid/306/Default.aspx>
3. Rehabilitation Services Commission (RSC)  
Phone 1-800-282-4536  
<http://www.rsc.state.oh.us/index>

4. ODMH Office of Support Services  
Phone 614-752-0116  
<http://www.mh.state.oh.us/what-we-do/provide/warehouse-and-pharmacy/index.shtml>
  5. DAS Office of State Printing  
Phone 614-995-1740  
<http://das.ohio.gov/Divisions/GeneralServices/StatePrintingandMailServices.aspx>
  6. DAS Office of Procurement Services  
<http://procure.ohio.gov/proc/index.asp>
2. If goods or services are not available from the vendors listed above, the next step is to review term or "required" contracts for product availability. These contracts are in effect for an extended period of time, usually one to three years. Please see the Business Office for further information.
  3. If the goods or services cannot be obtained from a term or "required" contract, a Minority Business Enterprise (MBE) or Encouraging Diversity, Growth and Equity (EDGE) vendor should be contacted. Please see the Business Office for further information.

When employee receives notification from the Business Office that all the above requirements have been exhausted and the goods or service are not available from these vendors, the next step is for the employee to obtain either verbal or written quotes from the vendor of their choice.

*Purchases less than \$500*

For purchases less than \$500, the ABH requestor must obtain a minimum of two verbal quotes. Please note the date, company name, person you received quote from and amount on the Request to Purchase (B) when submitting to the Business Office.

When it is not practical to obtain two verbal quotes, written supervisor approval must be on the Request to Purchase prior to the purchase being made and submission to the Business Office.

*Purchases more than \$500*

For purchases more than \$500, the ABH requestor will obtain a minimum of three written quotes on the vendor's letterhead and attach each to the Request to Purchase prior to the purchase being made and submission to the Business Office. Should a vendor be non-responsive to a request for a quote, documentation of the non-responsiveness must be provided in lieu of the quote. This is considered one of the three quotes.

4. Any IT (Information Technology) purchase needs to be coordinated with the Business Office to ensure all approvals are obtained prior to purchase.
5. A Request to Purchase (Attachment B) must be completed once a final decision on the vendor has been made. (See link below - please right click and choose "Open Hyperlink" to access the ODMH Request to Purchase)  
<http://intranet.mh.state.oh.us/Form/DMH-FIS-GEN-1038.pdf>

The following areas must be completed:

- Ordered By and Date;
  - Order Approved By (Supervisor) and Date;
  - Ship to Address;
  - Suggested Vendor (Company Name and Address);
  - Vendor Contact;
  - Vendor Phone Number;
  - Item #, Quantity Ordered, Unit Amount
  - Item Description, Specifications and Justifications – use this area to describe the item, the specifications for the item being ordered and justification for the purchase.
  - Unit Cost, Total Cost, Grand Total
6. Once the Request to Purchase is complete, it and all other necessary documents should be forwarded to the Business Office for processing either by email or hard copy.
  7. Emergency Situations - In the case of emergency needs, which require quicker turn-around time than the above processes, the Business Office should be contacted for guidelines.

C. Payment Card Purchases

Payment Cards for goods and services (except medical or legal services) may be used at any store or website that accepts credit cards. Whether purchasing items from a store or website, remember we are tax exempt (#31-1334820, Attachment C). If tax is charged on a purchase, it is the cardholder's responsibility to obtain a credit for tax charged.

When ordering items, the billing address is as follows:

Office of Budget and Management  
Requirements & Configuration Management  
4310 East Fifth Avenue  
Columbus, Ohio 43219  
614-338-4742

The spending limit for payment card purchases is \$2,500 per day or \$15,000 per month.

Employee must have prior approval from their Supervisor before making a payment card purchase. **This approval may be written or electronic and must be attached to their Payment Card Log prior to turning in to Business Office.**

When making a payment card purchase, employee must turn in a Payment Card Log (Attachment D). All areas must be complete on the Payment Card Log, along with employee signature and supervisor signature prior to turning in to Business Office.

**\*As a Payment Card Holder, your signature on the Payment Card Log verifies you ordered the items or service and they will only be used for or at Appalachian Behavioral Healthcare.**

**\*As a Supervisor of a Payment Card Holder, your signature on the Payment Card Log verifies the purchase was approved by you and that the items or service purchased will only be used for or at Appalachian Behavioral Healthcare.**

Payment Card Log and all supporting documentation (invoice, receipts, price quotes and bids, if applicable) must be attached before forwarding to Business Office. Payment Card Logs should be turned in WEEKLY by 10:00 a.m. the following Monday morning. Payment Card Logs should be turned in weekly regardless of whether the ordered item was received. Once item is received, notify the Business Office of date of delivery and forward the supporting documentation. (See link below - please right click and choose "Open Hyperlink" to access the ODMH Payment Card Log):

<http://intranet.mh.state.oh.us/Form/DMH-FIS-072.pdf>

The purchasing guidelines listed in *B. Identification of Need and Urgency – Outside* also apply to payment card purchases.

## II. IMPLEMENTATION

This procedure is effective as of the last revision date.

## III. REFERENCES

- ABH Policy B-12;
- ODMH Policy AF-09 Procurement Procedures for Supplies, Services and Information Technology (Effective June 2011);
- ODMH Policy AF-13 Guideline for Proper Usage, Documentation, and Approval of Payment Cards (Effective April 2011).
- Department of Administrative Services Directive 06-21

APPROVAL:

---

Jane E. Krason  
Chief Executive Officer

Effective Date: September 23, 1985  
Revised Date: May 24, 2012

## APPALACHIAN BEHAVIORAL HEALTHCARE

**POLICY:** L-12

EFFECTIVE DATE: October 28, 2010

REVISED DATE: April 30, 2013

**SUBJECT:** Code of Ethical Conduct

### I. PURPOSE

To articulate the ethical concerns and issues prone to conflict in the RPH and to define procedures to address the issues(s). To ensure Appalachian Behavioral Healthcare (ABH) employees conduct themselves in a manner that fosters public confidence in the integrity of the department, ODMH/ABH, its processes, and its accomplishments.

### II. POLICY

The RPH's Code of Ethics applies to all ABH employees, contract personnel, students, and volunteers. The main concerns of the code may appear in a number of different ways and formats, but their application and intent remain consistent. ODMH/ABH officials and employees must conduct themselves, in a manner that avoids favoritism, bias, and the appearance of impropriety.

### III. DEFINITIONS

For purposes of this policy the following definitions apply:

1. "Anything of value" - Includes anything of monetary value, including, but not limited to, money, gifts, food or beverages, social event tickets and expenses, travel expenses, golf outings, consulting fees, compensation, or employment. "Value" means worth greater than "de minimis" or nominal;
2. "Anyone doing business with ODMH" - Includes, but is not limited to, any person, corporation, or other party that is doing or seeking to do business with, regulated by, or has interests before ODMH;
3. "Close family members" - Includes parents, grandparents, children, siblings, spouses and domestic partners;

The word "ethics" has at least three related meanings: it refers to the moral behavior of a person (an ethical person), to a group of moral principles (a code of ethics), and to reflection on and guidance regarding moral behavior (the deliberation of the ethics committee). The context will indicate which of the related meanings is appropriate.

"Conflict of Interest" is defined as a conflict between the public obligation and private interest of a healthcare facility employee. A potential conflict of interest exists if the private interests of the employee might interfere with the public interests the employee is required to serve in the exercise of the employee's authority and duties in the employee's office or position of employment. It is the duty of every ODMH/ABH employee to report a potential conflict of interest to their supervisor and seek advice from the Office of Legal Services.

#### IV. MISSION, VISION, AND VALUES

ABH Mission, Vision, and Values establish the purpose of ABH, the course for its future direction, and the values by which they will be achieved. The Code of Ethical Conduct is consistent with this. ABH officials and employees must, at all times, abide by protections to the public embodied in Ohio's ethics laws, as found in Chapters 102. and 2921. of the Revised Code, and as interpreted by the Ohio Ethics Commission and Ohio courts.

#### V. CODE OF ABH ETHICAL CONDUCT

##### A. Patient Care

1. All patients are to be treated with **dignity and respect**. Staff is to observe and promote the human and legal rights of each patient as afforded to all citizens, irrespective of their mental disorder;
2. All patients' right to treatment and service are respected and supported **without discrimination** on the basis of race, color, gender, sexual orientation, gender or gender identity, age, religion, national origin, or handicap;
3. The patient's right to treatment and service includes the **right to refuse** prescribed medication or other recommended treatment in non-emergency situations. A patient's receiving of respectful care is not contingent upon the acceptance of recommended medications or other treatment interventions.

A guardian of a patient has the right as defined by law to make treatment decisions, including refusal of treatment, on behalf of the patient;

4. All employees shall try to assist patients in actualizing their potential for **recovery** by acknowledging their individuality, engaging their responsibility, recognizing their legitimate preferences, and supporting their hope as they prepare for discharge and a new phase of their recovery;
5. The patient's right to care and service shall be the primary ethical consideration in determining **patient movement**. All admissions to, transfers, and discharges from ABH are governed by applicable RPH policies and plans, such as the Utilization Management/Health Information Plan's admission and continued stay criteria.

##### B. Non-exploitation of Patients

1. No employee shall use his/her official position to obtain **special privileges**. Employees will not enter into or take advantage of any personal, social, business, or professional relationship with patients or patients' families for personal gain;

2. Under no circumstances does ABH permit, encourage, or support **personal relationships** between any staff member with any inpatient or outpatient patient or client, active or inactive. This includes (but is not limited to) social relationships (e.g. exchange of telephone numbers, social engagements, dating, or sex) and business relationships;

3. Employees shall keep information acquired in the course of their official duties **confidential**.

Such information shall not be used to further an employee's personal interests or to damage the interests or reputations of others.

No employee shall accept employment or engage in any business, or professional activity, which will require them to disclose confidential information, which has been gained by reason of their official position at ABH.

Employees are bound by the guidelines on confidentiality as stated in ABH policy, MIS-1 Confidentiality.

4. Patients are not expected to perform **labor activities** for ABH or its employees. Patients may, however, perform tasks of a personal housekeeping nature. They may also participate in ABH's Work Program as part of their treatment plan including the earning of money.

C. A general summary of the restraints upon the conduct of all officials and employees includes, but is not limited to those listed below. Employees shall not:

1. Engage in transactions for **personal gain** by soliciting, selling, collecting for, or advertising goods or services on ABH grounds or in connection with their ABH position;

2. Engage in sales and **solicitation for any organization**, other than those authorized by the Chief Executive Officer and/or designee, are prohibited;

3. Use his or her public position to solicit or accept anything of value from anyone doing business with ODMH/ABH;

4. Use his or her public position to solicit or accept employment from anyone doing business with ODMH/ABH or accept employment that may result in a conflict of interest with his or her public position;

5. Use his or her public position to obtain benefits for the official or employee, a family member, or anyone with whom the official or employee has a business or employment relationship;

6. Be paid or accept any form of compensation for personal services rendered on a matter before, or sells goods or services to ODMH/ABH;

7. Be paid or accept any form of compensation for personal services rendered on a matter before, or sell (except by competitive bid) goods or services to any state agency other than ODMH/ABH, unless the official or employee first discloses the services or sales and withdraws from matters before ODMH/ABH that directly affect officials and employees of the other state agency, as directed in R.C. 102.04;

8. Hold or benefit from a contract with, authorized by, or approved by ODMH; (the Ethics Law does except some limited stockholdings and some contracts objectively shown as the lowest cost services, where all criteria under R.C. 2921.42 are met);

9. Authorize, recommend, or in any other way use his or her position to secure approval of an ODMH/ABH contract (including employment or personal service) in which the official or employee, a family member, or anyone with whom the official or employee has a business or employment relationship, has an interest;
10. Solicit or accept honoraria (see R.C. 102.01(H) and 102.03(H));
11. During public service and for one year after leaving public service, represent any person, in any fashion, before any public agency with respect to a matter in which the official or employee personally participated while serving with ODMH/ABH;
12. Use or disclose confidential information protected by law, unless appropriately authorized;
13. Use, or authorize the use of his or her title, the name "Ohio Department of Mental Health," "Appalachian Behavioral Healthcare" or "ODMH/ABH," or ODMH/ABH logo in a manner that suggests impropriety, favoritism, or bias by the department, official or employee;
14. Solicit or accept gifts from any entity except the following: close family members; friends (including other family members) who are not lobbyists, state contractors or state grantees; or government officials from other states or countries (with gifts accepted on behalf of the State of Ohio); or
15. Solicit or accept token gifts (including food and/or beverages) with a collective value of more than \$20 per individual, vendor or group over the course of a calendar year;
16. **ABH property shall not be removed** from the buildings or ABH grounds for personal reasons. ABH reserves the right to inspect all packages carried to or from ABH and employee vehicles;
17. Employees shall not allow themselves to be **improperly influenced** in the performance of their official duties, by the kinship, rank, or influence of anyone.

#### D. Financial Disclosure

Pursuant to R. C. 102.02, every ODMH/ABH official and employee who is paid a salary or wage in accordance with schedule C of R.C. section 124.15 or schedule E-2 of R.C. 124.152 [124.15.2], is required to file an accurate and complete financial disclosure statement with the Ethics Commission by April 15 of each year. Any official or employee appointed, or employed to a filing position after February 15 and required to file a financial disclosure statement must file a statement within ninety days of appointment or employment.

#### E. Reporting and Assistance

All employees who are aware of wrongdoing or suspected wrongdoing by a state official or employee have an obligation to report such matters to the Ethics Commission, the Inspector General or through the anonymous reporting system being developed by the Governor's Office. Employees may seek the advice of the department's Chief Ethics Officer or attorneys within the Office of Legal Services at 614.466.8288 in making such reports. The Ethics Commission is also available to provide advice and assistance regarding application of the Ethics Law and related statutes. The Commission can be contacted at 614.466.7090. The Commission's Web site address is [www.ethics.ohio.gov](http://www.ethics.ohio.gov).

F. Penalties

Failure of any ODMH/ABH official or employee to abide by this Ethics policy, or to comply with the Ethics Law and related statutes, will result in discipline up to and including, dismissal, as well as any potential civil or criminal sanctions under the law.

G. Training Requirement

Pursuant to Executive Order 2007-01S, the Chief Ethics Officer, the Director and Assistant Director, and senior staff who are required to file annual ethics disclosure forms will participate in yearly mandated trainings through the Governor's Office and all other department employees will be required to participate in new employee (as applicable) and biennial training in accordance with the department's ethics training plan.

H. Supervision

1. Employees shall strive to improve their performance in their work duties on an ongoing basis. They should utilize supervision regularly for purposes of teambuilding, education, discussion of ideas to improve processes, and reporting of concerns regarding the performance of work peers, or the organization;
2. Supervisors shall not accept gifts of more than nominal value, money, or favors from employees under his/her jurisdiction, nor should the supervisor present these to those who are under his/her supervision. A spontaneous movement without assessment or pressure to collect money for gifts to honor weddings and retirement of co-workers or to provide flowers for the ill or floral tributes for funerals is acceptable with the approval of the appropriate Executive Committee member.

I. Business Practices

1. All ABH business transactions shall occur in an **honest and fiscally accountable** manner and in accordance with state purchasing and auditing practices;
2. All patient **billing** activities and third party claims for professional services shall only reflect **actual services** rendered;
3. Employees shall not engage in any transaction with any business entity in which he/she has a financial **interest** that might **conflict** with the discharge of his/her official duties;
4. Employees shall not seek **personal donations** from or receive compensation from anyone who conducts business with ABH. All requests for contributions from outside sources for patient purposes must be cleared and relayed through ABH's Volunteer Services Office;
5. Employees should not make **personal investments** or authorize or employ their authority or influence of their office to secure the investment of public funds in enterprises, bonds, mortgages, shares or other security of an issue in which the employee has an interest, direct or indirect, or as a result of which transaction any gains shall accrue to him/her which will otherwise create substantial conflict between the employee's duty to the public interest and the private interest;
6. ABH employees are to avoid conflicts of interest related to their state service;

7. Employees shall not enter into any agreements or affiliations with other care providers, educational institutions or other entities where potential or obvious conflict of interest or ethics violation exists;
8. With all health care providers or teaching affiliations ABH employees remain subject to the Code of Ethics as the agreements or affiliation are developed and implemented;
9. ABH medical and clinical teachers shall assure that all relationships with the respective universities for residency training, internships and other teaching responsibilities are free of potential conflict of interests and potential ethical violations;
10. Patients maintain the right not to participate in aspects of a resident's or student's training;
11. Patients are not to be subjected to additional treatment or therapies for the benefit of students as learning opportunities;
12. Patients are to be informed that they are receiving treatment from a student;
13. Patients' participation in any research is to be free of any coercion or undue influence. (See ABH Policy L-5 - Research and Publications);
14. Employees shall not enter into any agreements or affiliation with representatives of pharmaceutical company, which constitute a conflict of interest;
15. Patients will receive information regarding cost of care for which they will be responsible.

#### J. Marketing

Marketing activities will be limited to those, which describe the services and level of expertise provided at ABH.

As a public entity, ABH and its staff do not engage in marketing activities for the purpose of attracting patients.

ABH and its staff may take measures to educate the public regarding its services, provide community training and awareness programs, and develop relationships with other health care providers to ensure continuity of care.

#### VI. ETHICAL CONFLICTS IN PATIENT CARE ASSIGNMENTS

Employees of Appalachian Behavioral Healthcare may request to be excused from participating in an aspect of a patient's care or treatment in situations where the prescribed cultural values, sense of ethics, religious beliefs, or transference/counter-transference issues come into conflict with their own. In no instance will the mission of the organization be compromised. The effectiveness and safety of care, treatment, and services does not depend on the patient's ability to pay or with regard to disability, race, creed, color, gender, national origin, or lifestyle.

It is understood that situations may arise in which the prescribed course of treatment or care for a patient may be in conflict with the personal values or religious beliefs of a staff member. In such situations, it is the responsibility of the employee to immediately notify their supervisor or department head of their concerns and to request that they be excused from participating in a particular aspect of treatment/care of the patient.

. This request must be submitted in writing as soon as reasonably possible and must include the specific aspects of care from which the employee is requesting to be excused and the reason for making the request. Staff should sign, date and time the request.

The supervisor or department head will make a decision on the request and respond in writing with a signature, date and time of response indicated. As an alternative, email may be used for both the staff request and the supervisor response.

The requesting employee is responsible for providing appropriate patient care until alternate arrangements can be made. Refusal to provide care will result in disciplinary action up to and including termination.

In no circumstances will a request be granted if it is felt that doing so would negatively affect the care of the patient.

It must be realized that for reasons of staffing limitations, it may not be possible to grant a request.

Employees may request a transfer to a unit or position in which conflict of care issues are less likely to occur by submitting Attachment B to The Ethics Committee, with all pertinent email or other supporting documentation.

If the employee is not satisfied with the decision, they may request that the RPH's Ethics Committee review their situation. (The CCO is the Ethics Committee Chairperson and can be given this request.) The Ethics Committee should hold a special meeting as quickly as possible to review and respond to the request. The recommendation of the Ethics Committee shall be submitted to the Chief Executive Officer for a final decision.

## **VII. RESOLUTION OF DISAGREEMENTS IN PATIENT CARE**

Disagreements between staff and patients (and their families), including conflicts of interpretation, dilemmas of care, and disputed courses of action, should be resolved at the level closest to the situation generating the disagreement. For individual patients this is the treatment team; for groups of patients this would be the unit community meeting or patient empowerment group.

It is the responsibility of the treatment team leadership (normally the psychiatrist, but also the clinical nurse manager, charge nurse, or other person effectively leading the discussion) to identify disagreements in a patient's care, which are not yielding to the team's efforts at resolution and to seek assistance outside the team.

Resources, which may enable a team to achieve resolution, include the supervisory system, second professional opinions, client advocacy, the client grievance process, the Ethics Committee, and OLRS.

If a patient is unable to reach an agreement with his treatment team on some issue of his/her care, he/she may contact the client advocate or some other staff person (or significant collateral) to speak for him/her.

Staff and/or patients should be freely able to engage these resources and expect appropriate responses.

Clinical staff will always encourage patient participation and involvement in his/her treatment, especially regarding major care decisions; resolving dilemmas about care decisions, and resolution of complaints. When applicable, this also includes family.

## VIII. PROHIBITION OF DUAL REIMBURSEMENT

State employees while on state time may not retain reimbursement from trade associations, business, or public groups for appearances at their meetings. These provisions cover such matters as physicians appearing before medical associations, presenting papers, etc.

The Chief Executive Officer will decide if an employee's outside appearance is or is not an official function of the employee's position.

Just as there are areas of potential conflicts of interest affecting state service, there are also areas of mutual interest, which should be encouraged and fostered. Nothing in the Code of Ethical Conduct is intended to hamper activities or contacts which are in the best interest of patient care. (Examples: affiliations with local universities, local regional health care organizations, various organized volunteer programs, etc.)

- IX. If an ethical concern exists, it should be reported using the Statement of Ethical Concern/Issue (Attachment B) to the ABH Ethics Committee. The Committee will review the concern and make recommendations. The employee will receive a copy of the recommendations. If the employee is not satisfied that the issue is resolved, it may be forwarded to the AEC for final disposition.
- X. If a possible conflict of interest exists, it should be reported using the Disclosure of Potential Conflict of Interest (Attachment A) to the ABH Executive Staff. Conflicts of interest will be received and a plan prepared to manage the conflict. The employee will refrain from participation in the identified activity until the issue is resolved.

## XI. REFERENCES

- Ohio Administrative Rule 124.34; Joint Commission Standard R1 4.2
- ODMH Ethics Policy (L-04)

## APPROVAL

---

Jane Krason  
Chief Executive Officer

## Disclosure of Potential Conflict Of Interest

In compliance with the policies of Appalachian Behavioral Healthcare, it is the responsibility of all clinical staff of Appalachian Behavioral Healthcare to disclose anything that may be construed as a conflict of interest.

The Code of Ethical Conduct Policy L-12 provides the guidelines for disclosure as outlined. The Disclosure of Potential Conflict of Interest form will ensure that all perceived and/or potential conflicts of interest are reported and documented thoroughly.

**I have read and understand the ABH Code of Ethical Conduct Policy. To the best of my knowledge, I am involved in activity(s) that may be construed as a conflict of interest. I understand my obligation to immediately disclose this information. I have agreed to disclose the activity(s) below, and I understand this information will be submitted to the Human Resources Department and reviewed by the Appalachian Behavioral Healthcare Executive Committee for disposition.**

Name: \_\_\_\_\_ Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Position: \_\_\_\_\_ Title: \_\_\_\_\_

Potential Conflict: \_\_\_\_\_

Received by: (HR Officer) \_\_\_\_\_ Date: \_\_\_\_\_

Employee Name: \_\_\_\_\_ Date: \_\_\_\_\_

Administrative Executive Committee Verification:

**As per ABH policy, we, the Administrative Executive Committee has reviewed the disclosure form submitted by the above named individual, and if conflict of interest has been found; developed a plan to manage the potential conflict(s). Once implemented, the plan should ensure that none of the above referenced conflicts or potential conflicts will interfere with the performance of the staff member's position, or care provided to the patients.**

A potential conflict exists and a plan has been developed to manage as follows:

---

---

---

---

---

---

---

---

Accepted: \_\_\_\_\_ Date \_\_\_\_\_  
Jane Krason, Chief Executive Officer

Accepted: \_\_\_\_\_ Date \_\_\_\_\_  
Administrative Executive Committee Member

### Statement of Ethical Concern/Issue

Name \_\_\_\_\_ Date \_\_\_\_\_

I believe the following situation should be reviewed and discussed by members of the ABH Ethics Committee (Briefly state the concern or describe the situation. Extra sheets may be attached):

---

---

---

---

---

I believe the above-stated concern/issue violates the following ethical principle(s) by which all employees of Appalachian Behavioral Healthcare are bound:

Signature \_\_\_\_\_ Date \_\_\_\_\_

\*\*\*\*\*

The members of the ABH Ethics Committee have reviewed the above-stated concern/issue and have made the following recommendation(s):

---

---

---

1. Issue is resolved Employee Signature \_\_\_\_\_

2. Issue to be referred to AEC Employee Signature \_\_\_\_\_

Date referred to AEC \_\_\_\_\_

\_\_\_\_\_  
Date \_\_\_\_\_

ABH Ethics Committee  
Chairperson/Designee

# Shopping Rewards Cards

- Public employees are prohibited from accepting rewards/discounts earned from making purchases for their public agency with public funds.



Example: You are in a state vehicle and stop at a gas station to fill up. You swipe your personal rewards card and pay with the state Voyager card. You do this multiple times over the course of six months and earn enough points for a \$10.00 gift card to Applebee's.

—Prohibited

**State of Ohio**  
**CARDHOLDER AGREEMENT**

I, \_\_\_\_\_, agree to the following regarding my use of the Payment Card Program:

1. I understand that I am being entrusted with a powerful and valuable tool and will be making financial commitments on behalf of the State of Ohio and will strive to obtain the best value for the State of Ohio.
2. I understand that under no circumstances will I use the Payment Card to make personal purchases, either for myself or for others. Willful intent to use the Payment Card for personal gain may result in disciplinary actions, including termination of employment.
3. I will follow the established procedures for using the Payment Card. Failure to do so may result in either revocation of my use privileges or other disciplinary actions. Additionally, I will follow all my agency's and State of Ohio purchasing requirements.
4. I have been given a copy of the Payment Card Manual and understand the requirements for using the Payment Card Program.
5. I agree that should I violate the terms of this Agreement and use the Payment Card for personal use or gain, that I will reimburse the State of Ohio for all incurred charges and any fees related to the collection of those charges.

\_\_\_\_\_  
Employee Name (Print)

\_\_\_\_\_  
Agency Payment Card Administrator (Print)

\_\_\_\_\_  
Employee Signature

\_\_\_\_\_  
Agency Payment Card Administrator Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Date

Distribute to:  
Cardholder  
Agency Personnel Office  
Agency Payment Card Administrator  
OBM Statewide Payment Card Administrator

State of Ohio  
CARDHOLDER AGREEMENT

I TAFFNIE D. LENT agree to the following regarding my use of the Payment Card Program:

1. I understand that I am being entrusted with a powerful and valuable tool that will be making financial commitments on behalf of the State of Ohio and will strive to obtain the best value for the State of Ohio.
2. I understand that under no circumstances will I use the Payment Card to make personal purchases, either by myself or for others. Willful abuse of the Payment Card for personal gain may result in disciplinary actions including termination of employment.
3. I will follow the established procedures for using the Payment Card. Failure to do so may result in either revocation of my use privileges or other disciplinary action. Additionally, I will follow all my agency's and State of Ohio purchasing requirements.
4. I have been given a copy of the Payment Card Manual and understand the requirements for using the Payment Card Program.
5. I agree that should I violate the terms of this Agreement and use the Payment Card for personal use or gain, that I will reimburse the State of Ohio for all incurred charges and any fees related to the collection of those charges.

TAFFNIE D. LENT  
Employee Name (Print)  
Taffnie D. Lent  
Employee Signature  
9/14/09  
Date

Jill Stotridge  
Agency Payment Card Administrator (Print)  
Jill Stotridge  
Agency Payment Card Administrator Signature  
9/15/09  
Date

EXHIBIT A  
STATE OF OHIO  
PAYMENT CARD PROGRAM  
AGREEMENT



Payment Card Application

Emp. or Application Information

First Name: TAFFIE MI: D Last name: LENT

Emp. ID (\*SSN number): 10068164 Company Number: 33649

Address 1: 4310 East Fifth Ave. Address 2:

City: Columbus State: OH Zip Code: 43215

Work Phone: 740 594 5000 (4920) Home Phone: 740 594 9824

DMH 01

Business Unit (\*Optional): Central Nursing

Merchant Category Grouping

- Normal
Emergency
SuperUser
Util/Hotel
School
Airline

\*Access online requirements

Signature Section

Agency Administrator Signature: [Signature] Date: 9/18/09

OBM Administrator Signature: [Signature] Date: 9-18-09



### Cardholder Information

Cardholder Name: TAFENIE D LENT

Cardholder Employee ID: 10068164

Business Unit: DMHDI

Action:

Add

Change

Cancel

Speedchart


Fund	Account	AU	Department
	540000		

Program	Grant Proj	Project	Serv Loc	Reporting	Agency Use

Budget Reference

Merchant Category Code: Normal

Single Transaction Limit	Monthly Transaction Limit

Proxy Name	Proxy Employee ID	Role
TIM SPOTRIDGE	10148899	APPROVER
B MCKAY MURPHY	10042293	
SCOTT FERGUSON	10030810	
KATHLEEN WILLIAMS	10005224	
ERIN GRIFFITH	10061405	
LINDA VANNOY	10042237	
MARY CHRISTIE	10018013	
JULIA GARDNER	10074043	
TOYCE GLADSTONE	10046183	

#### Signature Section

Agency Administrator Signature: *Tim Spotridge* Date: 9/15/09

ORM Administrator Signature: *[Signature]* Date: 9-18-09