



# COLUMBIA HOUSING AUTHORITY

201 DYER STREET- P.O. BOX 115  
COLUMBIA, TN 38401-0115  
PHONE (931) 388-5203 – FAX (931) 540-8684  
TDD/TTY 1-800-545-1838 Ext. 868  
[www.chatoday.org](http://www.chatoday.org)

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Commissioner

**Trent Ogilvie**  
Executive Director

June 28, 2007

Tennessee Ethics Commission  
Suntrust Building  
201 4<sup>th</sup> Avenue North Suite 1820  
Nashville, TN. 37243

Dear Tennessee Ethics Commission,

I have enclosed the Code of Professional Ethics for the Columbia Housing Authority.

Please advise our agency if you deem our Code of Professional Ethics acceptable or unacceptable under the new requirements. If our policy is deemed unacceptable, we will consider adopting the MTAS Model Code of Ethics. I would like to request a copy of the Model Code to have for my files.

If you need any other information or assistance, please respond at your earliest convenience.

Sincerely,

Trent Ogilvie  
Executive Director  
Columbia Housing Authority

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2007 JUL -5 PM 12:50  
TENNESSEE  
ETHICS COMMISSION

**COLUMBIA HOUSING AUTHORITY**  
**CODE OF PROFESSIONAL ETHICS**

The Columbia Housing Authority Board of Commissioners hereby establishes the following Code of Professional Ethics. This policy defines what is considered acceptable and/or unacceptable practices, and the consequences of any breaches thereof are outlined within this document or the appropriate corresponding policy.

*Organizational Code of Conduct*

The Organization and its employees must, at all times, comply with all applicable laws and regulations. The Organization will not condone the activities of employees who achieve results through violation of the law or unethical business dealings. This includes any payments for illegal acts, indirect contributions, rebates, and bribery. The Organization does not permit any activity that fails to stand the closest possible public scrutiny.

All business conduct should be well above the minimum standards required by law. Accordingly, employees must ensure that their actions cannot be interpreted as being, in any way, in contravention of the laws and regulations governing the Organization's worldwide operations.

Employees uncertain about the application or interpretation of any legal requirements should refer the matter to their superior, who, if necessary, should seek the advice of the legal department.

*General Employee Conduct*

The Organization expects its employees to conduct themselves in a businesslike manner. Drinking, gambling, fighting, swearing, and similar unprofessional activities are strictly prohibited while on the job.

Employees must not engage in sexual harassment, or conduct themselves in a way that could be construed as such, for example, by using inappropriate language, keeping or posting inappropriate materials in their work area, or accessing inappropriate materials on their computer.

*Conflicts of Interest*

The Organization expects that employees will perform their duties thoroughly, honestly, and in accordance with the best interests of the Organization. Employees must not use their position or the knowledge gained as a result of their position for private or personal advantage. Regardless of the circumstances, if employees sense that a course of action they have pursued, are presently pursuing, or are contemplating pursuing may involve them in a conflict of interest with their employer, they should immediately communicate all the facts to their supervisor.

*Outside Activities, Employment, and Directorships*

All employees share a serious responsibility for the Organization's good public relations, especially at the community level. Their readiness to help with charitable, educational, and civic

activities brings credit to the Organization and is encouraged. Employees must, however, avoid acquiring any business interest or participating in any other activity outside the Organization that would, or would appear to:

- Create an excessive demand upon their time and attention, thus depriving the Organization of their best efforts on the job.
- Create a conflict of interest—an obligation, interest, or distraction—that may interfere with the independent exercise of judgment in the Organization's best interest.

#### *Relationships With Clients and Suppliers*

Employees should avoid investing in or acquiring a financial interest for their own accounts in any business organization that has a contractual relationship with the Organization, or that provides goods or services, or both to the Organization, if such investment or interest could influence or create the impression of influencing their decisions in the performance of their duties on behalf of the Organization.

#### *Gifts, Entertainment, and Favors*

Employees must not accept entertainment, gifts, or personal favors that could, in any way, influence, or appear to influence, business decisions in favor of any person or organization with whom or with which the Organization has, or is likely to have, business dealings. Similarly, employees must not accept any other preferential treatment under these circumstances because their position with the Organization might be inclined to, or be perceived to, place them under obligation.

#### *Kickbacks and Secret Commissions*

Regarding the Organization's business activities, employees may not receive payment or compensation of any kind, except as authorized under the Organization's written policy that establishes the specific guidelines. In particular, the Organization strictly prohibits the acceptance of kickbacks and secret commissions from suppliers or others. Any breach of this rule will result in immediate termination and prosecution to the fullest extent of the law.

#### *Organization Funds and Other Assets*

Employees who have access to Organization funds in any form must follow the prescribed internal control procedures for recording, handling, and protecting money as detailed in the Organization's instructional manuals or other explanatory materials, or both. The Organization imposes strict standards to prevent fraud and dishonesty. If employees become aware of any evidence of fraud and dishonesty, they should immediately advise the Executive Director or the Board of Commissioners so that the Organization can promptly investigate further.

When an employee's position requires spending Organization funds or incurring any reimbursable personal expenses, that individual must use good judgment on the Organization's

Date: 3-17-05

behalf to ensure that good value is received for every expenditure. No reimbursement of expenses will be processed without a written receipt and proper authorization.

Organization funds and all other assets of the Organization are for Organization purposes only and not for personal benefit. This includes the personal use of organizational assets, such as computers, copiers, vehicles, machinery, tools, supplies, and personnel.

#### *Organization Records and Communications*

Accurate and reliable records of many kinds are necessary to meet the Organization's legal and financial obligations and to manage the affairs of the Organization. The Organization's books and records must reflect an accurate and timely manner of all business transactions. The employees responsible for accounting and recordkeeping must fully disclose and record all assets, liabilities, or both, and must exercise diligence in enforcing these requirements.

Employees must not make or engage in any false record or communication of any kind, whether internal or external, including but not limited to:

- False expense, attendance, production, financial, or similar reports and statements
- False advertising, deceptive marketing practices, or other misleading representations

#### *Dealing With Outside People and Organizations*

Employees must take care to separate their personal roles from their Organization positions when communicating on matters not involving Organization business. Employees must not use organization identification, stationery, supplies, and equipment for personal or political matters.

When communicating publicly on matters that involve Organization business, employees must not presume to speak for the Organization on any topic, unless they are certain that the views they express are those of the Organization, and it is the Organization's desire that such views be publicly disseminated.

When dealing with anyone outside the Organization, including public officials, employees must take care not to compromise the integrity or damage the reputation of either the Organization, or any outside individual, business, or government body.

#### *Prompt Communications*

In all matters relevant to customers, suppliers, government authorities, the public and others in the Organization, all employees must make every effort to achieve complete, accurate, and timely communications—responding promptly and courteously to all proper requests for information and to all complaints.

#### *Privacy and Confidentiality*

When handling financial and personal information about customers or others with whom the Organization has dealings, observe the following principles:

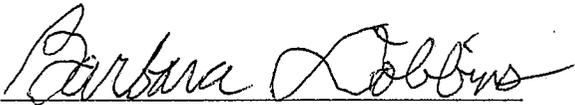
Date: 3-17-05

1. Collect, use, and retain only the personal information necessary for the Organization's business. Whenever possible, obtain any relevant information directly from the person concerned. Use only reputable and reliable sources to supplement this information.
2. Retain information only for as long as necessary or as required by law. Protect the physical security of this information.
3. Limit internal access to personal information to those with a legitimate business reason for seeking that information. Use only personal information for the purposes for which it was originally obtained. Obtain the consent of the person concerned before externally disclosing any personal information, unless legal process or contractual obligation provides otherwise.

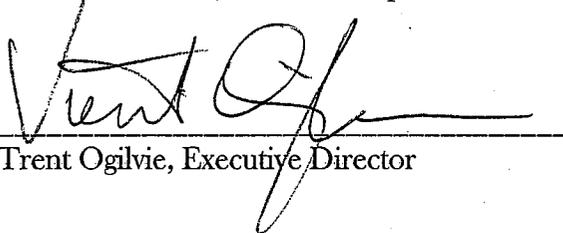
The effective use of these Codes of Conduct should ensure that the management and employees of the Columbia Housing Authority operates with the highest regard for ethical and professional standards of conduct.

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Signed:



Barbara Dobbins, Board Chairperson



Trent Ogilvie, Executive Director