



Code of Conduct DCT Staff and Board-Members

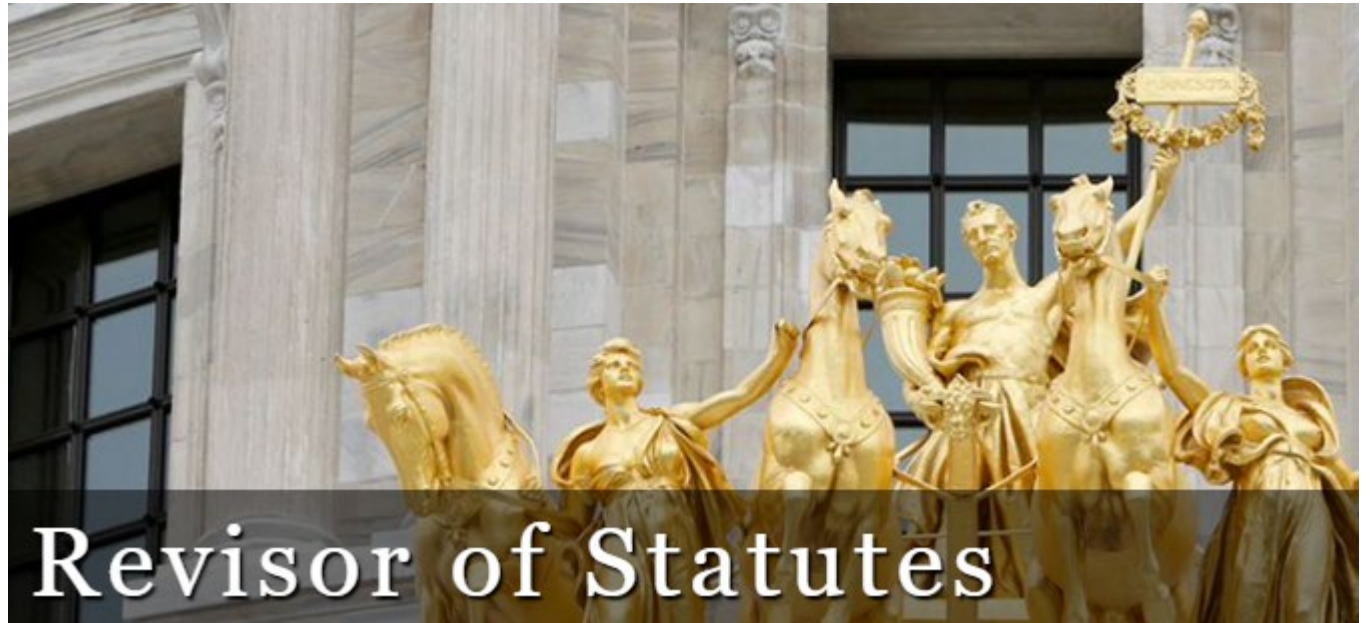
Jeshua Livstrom, Chief Compliance Officer

DCT Board Code of Conduct

- DCT Executive Board Policy Number: 100-1005 – outlines special duties of the board
- Augments, but does not replace existing law and policy
- Fiduciary Responsibilities:
 - Duty of Care – Exercising reasonable care and diligence
 - Duty of Loyalty – Acting in support of DCT mission and interests
 - Duty of Integrity – Following law, policy, and ethical principals
- Enforcement and Reporting Obligations
 - Must report suspected violations to General Counsel or DCT Ethics Officer

State Law

- Minn. Stat. sec. 43A.38 “Code of Ethics for Employees in the Executive Branch”
- Scope:
 - Gifts and favors
 - Use of confidential information
 - Use of state property
 - Conflicts of interest



Statewide Policy

- MMB HR/LR Policy # 1445 “Code of Ethical Conduct”
 - Enforces Minn. Stat. sec. 43A.38, and provides additional details to clarify compliance
- MMB HR/LR Memo # 2015-5 “Code of Conduct FAQs”
 - Another resource that provides specific scenario-based clarity
- Does Minn. Stat. sec. 43A.38 and MMB’s Code of Conduct apply to DCT Board Members?
 - Yes, probably
 - Policy updates are recommended to clarify

MMB Training and Policy Acknowledgment

- All state staff are required to take a computer-based training on the code of conduct annually
 - Training covers acceptance of gifts, use of confidential information, use of state property or time, conflicts of interest, non-retaliation, internal controls and reporting, code of ethics responsibilities
- Staff must also complete a Code of Ethical Policy Acknowledgement, which serves as an attestation
- Opportunity for improvement: DCT completion rates

A screenshot of a web-based form titled 'Code of Ethical Conduct'. The title is in white text on a dark blue background. Below the title, the text 'Policy Acknowledgement' is displayed in a smaller, grey font. To the right of this text is a green rectangular button with the word 'Continue' in white text.

DCT Code of Conduct

- Direct Care and Treatment Employee Code of Conduct, DCT Policy Number: 105-1002
- “DCT-wide” applicability
- Augments Minn. Stat. 43A.38 and MMB Code of Conduct. Examples include:
 - Requires DCT staff to have familiarity with division homepages, and to be knowledgeable about DCT announcements
 - Requires using a person-centered approach with the people we serve
 - Requires staff to provide safe and therapeutic environment
 - Requires practice of inclusiveness
 - Prohibits falsifying records, including client records
- Requires all staff to sign “DCT Workplace Relations” acknowledgement during annual performance reviews, which reinforces various expectations related to respect in the workplace with colleagues and clients
 - Opportunity for improvement: automate DCT Workplace Relations Acknowledgement through computer-based module

Supporting code of conduct

- Hotline
- Ethics Officer and inquiry application
- Conflict of interest disclosures
 - At time of hire for all staff
 - Periodic as-needed
 - Annual for Executive Board Members
- Opportunity for Improvement
 - Annual disclosure for DCT Senior Leadership



[MN.IT Central](#)



Hotline: Report a Concern

[DCT Sharepoint](#) [Compliance-Civil Rights](#)

Data July 2025 through June 2026

- Conflict of interest disclosures:
 - Outside employment = 13
 - Board position = 2
 - Other Volunteer = 2
 - Familial ties = 2
 - Client Relationship = 2
- Ethics Inquiries:
 - Gifts = 4
 - Referrals to Hotline = 3
 - Client-related research = 1

Opportunities for improvement

- Enhanced presence for compliance and ethics among direct care staff
- Policy updates
- Code of Conduct training and attestation compliance
- Annual COI disclosure for DCT senior leadership



Thank You!