

WHY WOULD ANYONE REFUSE TO MEET COPE MINISTRIES HONESTY IN MARKETING STANDARDS?

Provided by COPE Ministries and authored by Rev. Minister Angela Smith

First, I'd like to share what I see as the list of potential benefits of accepting the "Honesty In Marketing" requirements in the "offer" as shown at or available at <https://www.cope.church/standards.htm> :

BENEFITS OF ACCEPTING OFFER

1. Transparency: Fully provides whole picture to potential customers/clients who are told to assume the risk without the entirety of the risk being disclosed regarding known risks given actual history. In addition, provides opportunity to participate in the narrative when criticism or concerns are shared rather than leaving the narrative up to critics/complainants and/or COPE Ministries (including HEAL Mission).
2. Restores Good Faith In Spirit Of The Law: UCC guidelines require honesty and fair dealing. Honesty includes disclosing known risks. Failing to do so effectively is certainly done in violation of the spirit, if not the letter, of the law. Don't violate the Good Faith Spirit of the Law and lead by example in accepting criticism or critical feedback. In other words, don't be a hypocrite.

LIKELY REASONS FOR REFUSAL

1. Violates HIPAA: The facility, program, or provider is a licensed medical or mental health services provider. Should they disclose patient records or reference incidents publicly that happened in treatment they could be sued for violating HIPAA. However, this reason is easily overcome by simply providing the public records such as lawsuits filed, settlement agreements (or at least disclosure of what the claims were that resulted in settlement), police calls/reports, regulatory inspection reports, regulatory violation citations, and anything else that is a matter of public record. FOIA yourself. And, since public record and available through FOIA in some cases, the provider can easily disclose that history without violating HIPAA. As far as the uncensored feedback board for compliments and criticism, such a message board could include notification that it is public and available to the public and any use of it by clients or former clients by nature of posting connotes agreement to public responses possibly by representatives of the provider or other clients/former clients who witnessed any incident discussed.
2. Violates Confidentiality of Clergy: The facility, program, or provider is run by a faith-based charity or church. All conversations with clergy during confession or expressly requested to be confidential are recognized as such by the law. I don't know that that's true, I know clergy can't be compelled to testify in a court of law regarding confidentially disclosed statements made by parishioners, but, I don't know that we are barred from doing so. In fact, I believe it is more aligned with Christ's teachings to keep your faith to yourself and do good works to show your faith through good works, but, we all digress a bit on that one including Jesus at times from some perspectives. But, Jesus wasn't silent

about false prophets and openly accused people of it to their faces at temple and even while dealing with demonic swine who raped children. So, I see no reason other faith-based organizations can't show humility and willingness to accept feedback to avoid hypocrisy and permit for open dialogue with anyone who wishes to reveal themselves and others.

3. Marketing Nightmare: The internet is like a jungle or the wild west. They don't want to invite it to their platform to the extent it exists off it. It's bad enough they have to worry about internet vulnerabilities and protecting client confidentiality without being forced to permit the free exchange of ideas on their own platform regarding their products and/or services. They accept that HEAL Mission of COPE Ministries serves an important function to assist people who need help seeking justice or at least voicing themselves regarding their products and/or services. And, if HEAL Mission and COPE Ministries feels that's the best use of our time and resources to any extent, then, that's our right and they may or may not choose to offer feedback.

So, I understand why some or even many won't accept the offer to meet our simple standard of "Honesty In Marketing" even though we meet it at COPE Ministries. UHS, Inc. sued us (but under seal so we can't share the actual court documents) and we posted information about it, which we've kept up at <http://www.heal-online.org/healsuit.htm>. We've posted exchanges and complaints with resolutions for years at <http://www.heal-online.org/requests.htm>. We've posted the "Cease and Desist" letters from law firms at <http://www.heal-online.org/harassment.htm> threatening Strategic Lawsuits Against Public Participation (SLAPP). And, now we're offering the Feedback page at <https://www.cope.church/feedback.htm> too. So, we lead by example. And, I suppose depending on how well we're supported will send a message to those reluctant to be transparent regarding whether they are making the right choice in some ways. But, my suggestions are the most moral and ethical from my perspective and it isn't like the industry doesn't know how to cover it's butt when it comes to disclaimers, assumption of risk, and placing liability solely on participants. So, I'm not really buying the whole "violating HIPAA" to have a public open forum message board on your own websites for compliments and complaints that are uncensored.

Everyone who actually meets and continues to meet the COPE Ministries "Honesty In Marketing" standard will be permitted to post the following on or in their materials: "COPE Ministries and HEAL Mission recognize our program for Honesty In Marketing." You can link to the Standards page and the watch-list if you like to show all those who didn't make the grade. Up to you.

And, I don't know how to be more fair, but, if I come up with a way, I'll alert everyone likely via Twitter at <http://www.twitter.com/heal247>.