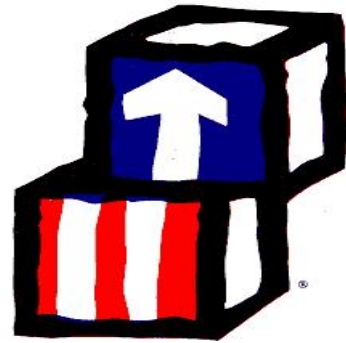


NORTHEAST OKLAHOMA COMMUNITY ACTION AGENCY, INC.



PERSONNEL POLICIES

February 14, 2011-February 14, 2012

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CHAPTER I

GENERAL POLICIES

The purpose of these Personnel Policies is to establish standard procedures throughout the Northeast Oklahoma Community Action Agency, Inc. These policies do not apply to people placed with our agency by an outside organization.

The agency will abide by instructions and all policies and procedures issued by the appropriate authority relevant to any and all grants administered by the agency, including, but not limited to 45CFR Part 1304 Head Start Program Performance Standards.

These Personnel Policies will be reviewed annually by the Head Start Policy Council Personnel Committee and the Personnel Policies Committee of the Northeast Oklahoma Community Action Agency, Inc. Board of Directors. They will make recommendations for amendments or approval as currently written. Amendments may be recommended at any regular meeting of the Board of Directors, in which case a meeting of the Head Start Policy Council Personnel Committee and the Personnel Policies Committee of the Board of Directors will be held to review the proposed amendments and make recommendations for approval/disapproval.

All employees will have access to the Personnel Policies on the agency website and will sign a statement of receipt. A copy of the policies will be posted at each site.

The Board of Directors has delegated the authority to administer the Personnel Policies to the Executive Director. The Executive Director delegates to Program Directors the authority to administer these policies as they relate to their specific programs.

These policies, pursuant to NEOCAA Board of Directors and Policy Council approval are effective from February 14, 2011 through February 14, 2012 and will be reviewed for the following year.

CHAPTER II

NON-DISCRIMINATION POLICY

Equal Employment Opportunities with the agency shall be open to any person without regard to race, sex, religion, disability, color, age, national origin, creed, ancestry, marital status, pregnancy, political affiliation or belief or membership in a recognized uniformed service. This agency is an Equal Opportunity Employer and does not discriminate in personnel practices.

A prohibition against discrimination is stated as a general condition of all grants of the Economic Opportunity Act of 1964 as amended. This agency complies with all Oklahoma Department of Commerce (ODOC) regulations, DHHS/ACF Terms and Conditions as stated on the Notice of Grant Award - Nondiscrimination Under Programs Receiving Federal Assistance through the Department of Health and Human Services Effectuation of Title VI of the Civil Rights Act of 1964, and/or any and all other federal and state regulations as applicable. These conditions are to become a part of these policies.

The current Affirmative Action Plan was adopted on January 7, 2010. It is updated annually by the Board of Directors and is a separate policy. The Affirmative Action Plan is posted at all work locations.

CHAPTER III

RECRUITMENT AND SELECTION

All open positions will be advertised within the agency and notice will be given to Head Start parents by open positions being posted on parent boards in Head Start centers. Opportunity for employment with the Northeast Oklahoma Community Action Agency shall be open to any person who can present satisfactory evidence of qualifications for the position. All applications shall be considered without regard to race, sex, disability, religion, national origin, color, creed, age or any other factor not related to an appraisal of the candidate on the basis of qualifications for the position (see Ch. II Non-Discrimination policy). It shall be the policy of the agency to promote qualified employees from within whenever possible. Public notice will be issued as to all vacant positions of the agency. Positions will be posted with the Oklahoma Employment Security Commission (OESC) Job Net at www.oesc.state.ok.us and/or otherwise publicly advertised, if no qualified applicant is selected within.

The agency will employ only persons with competence and integrity. A conviction for a serious crime shall be considered strong evidence of lack of fitness for employment in a professional, fiscal or management position. Before employment of such a person in one of these categories, the agency shall conduct an investigation in accordance with fair standards, and if it finds this does not disqualify the person, shall promptly provide a written statement of its findings to the appropriate Federal or State Agency. Criminal records alone shall not constitute a basis for disqualification for other positions, but full disclosure of such records to the agency is required. The agency will review each application for employment individually in order to assess the relevancy of an arrest, a pending criminal felony charge, or a conviction. No person convicted of, or charged with, the commission of any felony crime, especially acts of child abuse or child sexual abuse or violation involving immoral acts, or which is charged as **any** felony shall be employed.

Membership in any subversive organization or activity is inconsistent with employment in Northeast Oklahoma Community Action Agency. Proof of such membership may be cause for disciplinary action, suspension, and/or termination of employment.

The Board of Directors will employ the Executive Director, Head Start Director, Human Resources Manager and Business Manager, with approval from the Regional Office. The Executive Director will employ all other program staff. The Head Start Director will be responsible for employing all other Head Start staff. Nonprofessional personnel will be selected according to program guidelines.

The Personnel Committee of the Policy Council could be engaged with Head Start Managers, at the direction of the Head Start Director, in the employment process. All Head Start employees are hired by the Head Start Director pending Policy Council approval, which must be obtained at the next regularly scheduled Policy Council meeting. Prior approval will be obtained whenever possible, unless a delay in hiring would negatively impact program operations. Employment is

not considered final until the Policy Council has approved (Head Start staff only), an acceptable OSBI background check, a clear background check from OKDHS/OCCS (Head Start staff only) and a negative pre employment drug screening is obtained. Potential employees that would be working directly with children must have a clear OSBI and OKDHS/OCCS background check before working in Head Start facilities.

All current and prospective employees must sign a declaration prior to employment that lists all pending and prior criminal arrests. All charges, whether it is related to child sexual abuse and their disposition, convictions related to other forms of child or any other abuse and neglect, and all convictions of any violent felonies. The declaration excludes traffic fines of \$200.00 or less, any offense (other than those related to child abuse and/or child sexual abuse or violent felonies) committed before the prospective employee's 18th birthday which was finally adjudicated in a juvenile court or under a youth offender law, any conviction the record of which has been expunged under Federal or State law, and any conviction set aside under the Federal Youth Corrections Act or similar State authority.

Regular volunteers (defined as working more than 20 hours a week) who work with children must also sign a volunteer declaration and pass an OSBI background check prior to volunteering that lists all pending and prior criminal arrests and charges related to child sexual abuse and their disposition, convictions related to other forms of child abuse and neglect, and all convictions of all violent felonies. Declaration exclusions are the same as above. Individuals with previous criminal history against children will **not** be allowed to volunteer in Head Start Centers.

Reference Checks

Employment and personal references will be completed on any applicant selected for employment, prior to being hired.

Before any employee is hired for the agency, the program will conduct an interview with the applicant, secure a verification of personal and employment references, an OSBI criminal background check, a clear check from OKDHS/OCCS (Head Start only) and pass a pre-employment drug screening. Potential Head Start employees working directly with children will not be allowed to work in Head Start facilities until clear checks are received and hiring will not be final until Policy Council has approved their hire. (Policy Council approves only Head Start staff)

Employment Verifications will be given only by the Fiscal Department or the HRM.

Prohibition Against Partisan Political Activity

The Board of Directors has adopted the provisions of the appropriate authority's revised Policies and Procedures Manual regarding restrictions on political activities of the Agency and its employees:

Pursuant to 5 USCS 1501-1509 (the Hatch Act) and regulations relating to the Economic Recovery and Budget Reconciliation Act, all employees, volunteers and board members of

grantees or subcontractors have certain restrictions placed on their political activities. Such restrictions include, but are not limited to, the following:

"You may not use your official authority to interfere with the result of an election or a nomination for a party or public office (elective office)."

"You may not coerce, attempt to coerce, command or advise an employee to pay, lend or contribute personal services or anything of value for political purpose."

"The use of program funds for any political purpose is prohibited. Neither may you permit the use of equipment or premises, which are purchased or leased with program funds, for political purpose."

"You cannot discriminate against or in favor of any employee or beneficiary of the program because of his or her political beliefs. You cannot require an employee or beneficiary to disclose his or her political affiliation."

"You may not offer employment, promotion or benefits under the program as a reward for the support or defeat of any political party or candidate for public or party office. The law prohibits you from threatening, creating a disadvantage in employment or deprivation of benefits as a penalty for such support."

"While carrying out the program of your agency, if you are an employee, you cannot engage in voter registration activity or in transporting voters to the polls."

"In addition, employees of grantees or subcontractors are not permitted to be candidates for certain public elective offices."

Employment in a Community Action Agency will not be offered as a reward for political activity, the active support of a political party or a political candidate. Community Action Agency employees may engage in partisan political activities during their off duty hours but they are prohibited from becoming a candidate for a partisan political office while they are employed by a Community Action Agency.

Rules Governing Conflict of Interest and Nepotism

See Appendix G

The following rules shall be observed with respect to persons whose employment is supported by Federal funds, State funds, and/or by contribution to the non-federal share.

A. No person shall hold a job over which an immediate family member exercises immediate supervisory authority.

B. For purposes of this policy, relative is defined as follows:

Spouse	Children	Parents	Grandchildren	Grandparents
Brother/Sister	Spouse of Child	Spouse of Parents	Spouses children	

Spouses grandchildren

Spouse of someone related to a Board member by marriage is eligible for employment. Spouse of someone related to a Board member by blood is ineligible for employment. Children include adopted children and step-children.

Orientation Period

There are two (2) types of orientation periods:

1. New employee orientation
2. Orientation for an employee in a new position

1. New Employee Orientation

All new Full Time employees will be subject to a sixty (60) working day orientation period commencing on the first day of employment. For Head Start employees, employment is not considered final until the Policy Council has approved and we have an acceptable OSBI background check and a clear check from OKDHS/OCCS is obtained. The employee's supervisor will evaluate his/her reaction to training, work habits, and other pertinent data and the employee will receive a written evaluation at the end of thirty (30) working days. Should the employee receive an unfavorable thirty (30) working day written evaluation, training and technical assistance will be provided to upgrade their capabilities. The employee will be evaluated again at least ten (10) working days prior to the end of the orientation period. The employee's supervisor will submit a written recommendation to the Program Director or Executive Director concerning whether or not to retain this employee beyond the orientation period, the basis of the recommendation, any areas in which the employee's performance needs improvement, and training and technical assistance available to improve performance. If the evaluation is not completely satisfactory, the orientation period may be extended. If the evaluation is unfavorable, and the employee's supervisor does not recommend the employee be retained in the position, the employee may be dismissed.

During the orientation period the employer or the employee may terminate the employment relationship without cause and without the usual advance notice. Employees who voluntarily or involuntarily terminate within the orientation period do not have the right to appeal under the Chapter XVI - Adverse Actions, Appeal Procedures, Internal Dispute Resolution.

New employees will receive Annual and Sick Leave as specified in this document in Chapter VII Employee Benefits according to staffing assignment (Head Start Center or Non-Head Start center staff).

2. Orientation for Employees in a New Position

All employees in a new position will be subject to a sixty (60) working day orientation period commencing on the first day of service in the new position. Employees on orientation will receive a written evaluation at the end of thirty (30) working days. The employee's supervisor will evaluate his/her reaction to work performed in the new position. Should the employee receive an unfavorable thirty (30) working day evaluation, training and technical assistance will be provided to upgrade their capabilities. The employee will be evaluated again at least ten (10) working days prior to the end of the orientation period. The employee's supervisor will submit a written recommendation to the Program Director or

Executive Director concerning whether or not to retain this employee beyond the orientation period, the basis of the recommendation, and any areas in which the employee's performance needs improvement. If the evaluation is not completely satisfactory, the orientation period may be extended. If the evaluation is unfavorable, and the employee's supervisor does not recommend the employee be retained in the position, the employee may be transferred to a position comparable to his/her previous position, if such a position is available and salary adjusted accordingly, or may be dismissed without cause by the Program Director. Head Start employees who were promoted to a new position (not a lateral transfer between centers) will be paid according to the agency's current salary scale.

Employees who are on orientation due to a new job position continue to earn, and are able to use Annual and Sick Leave as permitted under Chapter VII - Employee Benefits.

CHAPTER IV

POSITION AND COMPENSATION

All employees will be paid at least minimum wage. Wages and benefits will be based on duties and responsibilities assigned to the position.

The majority of the positions within the agency are funded with public resources. An interruption or cessation of these resources could have an impact on employment and level of compensation.

Education qualifications (including certification if appropriate) shall not be the only basis upon which a candidate is employed or advanced; ability to carry out the required duties will also be considered.

In addition to regular wages paid to employees, when supplemental funds are received or when funds are available within the budget, a Cost of Living Adjustment (COLA) salary increase and/or quality improvement salary increase may be given to employees.

Salary increases are dependent on the regulations and funds available from each program's funding source. Any staff member employed to work for specific programs within the agency, and salary increases may not always be the same for all programs. Cost of living and/or quality improvement, increases must be approved by the CAA Board of Directors and by Policy Council for Head Start employees.

Based on agency needs, a current employee could be temporarily reassigned to a different position and/or location for a set period of time, and be compensated accordingly. Temporary positions may deviate from salary schedule based on qualifications and/or special needs, with the approval of Program Director and Executive Director. Based on agency need, an employee could be permanently reassigned to a similar position at a different location.

Each Full Time Head Start employee shall sign a Wage Agreement. The Wage Agreement is a binding contract (Certified Teachers only) to work a specified number of annual hours, states the employee's title, employment location and rate of pay. Full Time employee salaries are based on the scheduled number of annual hours that will be paid on an equal pay basis commencing each August 1. Employees could be paid on an hourly basis for hours worked and leave will be pro rated when hired after January 1st.

Each Head Start employee will receive an initial schedule detailing the hours they are expected to work each pay period and supervisors will make any adjustments due to weather or emergency thereafter. The office must be notified at time of adjustment to schedule for approval.

CHAPTER V

CLASSES OF EMPLOYEES

Employment classification and eligibility for benefits are determined as follows:

1. Full-time Employee

A full-time employee is one who has been hired without a predetermined terminal point of employment and is scheduled to work in a position that is normally scheduled for at least 1520 hours annually.

Full-time employees will receive benefits as specified in this document in Chapter VII Employee Benefits proportional to annual working hours and staffing assignment (Head Start Center or Non-Head Start center staff).

2. Part-time Employee

A part-time employee is one who has been hired and scheduled to work less than 1520 hours per year.

Part-time employees are eligible for 403(b) benefits, both contribution and match after one (1) year of employment if they work at least 1000 hours per year. Part-time employees will be paid for actual hours worked.

3. Temporary Employee

A temporary employee is one who could have been hired on a short term basis to carry out project specific activities not expected to continue indefinitely. A temporary employee may be considered a full or part time employee.

Temporary Employees are eligible for 403(b) benefits, both contribution and match after one (1) year of employment if they work at least 1000 hours per year. Temporary employees will be paid for actual hours worked.

4. Substitute

A substitute is one who has been hired to work on an as-needed basis. Substitutes are only eligible for 403(b) benefits, both contribution and match after one (1) year of employment, if they work at least 1000 hours per year. Substitutes will be paid for actual hours worked.

Ambiguity Regarding Employment Classifications

If any ambiguity arises regarding an employee's classification, it will be interpreted to benefit the employee. Employee personnel files will contain documentation regarding Exempt or Non-exempt status.

Supervisor

A supervisor is the person to whom an employee looks to for direction, authority, and guidance according to the agency's organizational chart. A supervisor is responsible for completing job evaluations for staff under his/her supervision.

JOB DESCRIPTIONS

The following descriptions outline the duties and responsibilities for each position of the Agency.

Executive Director - The Executive Director manages, supervises, coordinates and is administratively accountable for all activities and programs under NEOCAA and is under the direction of the NEOCAA Board of Directors

Services Director - The Services Director is responsible for developing, managing and coordinating service programs for applicants and recipients of services of the Community Action Agency. The Services Director is directly responsible to the Executive Director.

Business Manager - The Business Manager maintains all financial transactions within the accounting system, prepares financial reports and monitors compliance with accounting procedures. The Business Manager is directly responsible to the Executive Director.

Fiscal Assistant - Under the supervision of the Business Manager, the Fiscal Assistant is responsible for carrying out a system of financial transaction processing for the agency that is consistent with applicable regulations and generally accepted accounting procedures. This includes processing payment of purchases, reviewing financial transactions for accuracy, assisting with the agency financial audit, performing inventory review, and preparing reports as may be required.

Payroll Clerk-Under the supervision of the Business Manager, the Payroll Clerk is responsible for all functions associated with payroll both semi-monthly and weekly.

Social Service Case Manager - The Case Manager is responsible for assisting clients with making applications for all services provided by the agency, providing information and referrals to clients based on the agency's resource directory. Provides follow-up with clients receiving services from the agency, and coordinates with other agencies in the delivery of services to clients. Prepares reports of all client contact, services information and referrals, meetings attended and other activities, as needed. The Social Service Case Manager reports to the Services Director.

Planner - The Planner is responsible for designing and interpreting needs assessment instruments for program development. Prepares applications for funding from foundations, federal, state and local resources. Submits refunding application of the agency as requested. Completes the planning, research, documentation and applications for new proposals. Represents the agency at

the direction of the Executive Director by attending state, regional and national meetings concerned with new programs. Coordinate agency programs with outside resources at the direction of the Executive Director.

Special Projects Director- The Special Projects Director is responsible for the development and implementation of new initiatives to be carried out by the agency. These activities include health care systems development, financial empowerment activities, and economic development activities. The Special Projects Director reports to the Executive Director.

Financial Empowerment Specialist- The Financial Empowerment Specialist develops and implements programs that provide assistance to clients in financial management. Activities include foreclosure counseling, financial literacy training, tax assistance, homebuyer education and micro lending. The Financial Empowerment Specialist reports to the Special Projects Director.

Administrative Assistant - The Administrative Assistant is responsible for performing grant activities and other administrative functions as required and/or assigned by the Executive Director. The Administrative Assistant manages agency grant files and agency manuals, prepares board materials and maintains accounts payable-filing system. The Administrative Assistant reports to the Executive Director.

Weatherization Manager- The Weatherization Manager organizes and manages a system of application for weatherization services; maintains a computer database of applicants, recipients and services; develops and maintains an information and referral service; manages the weatherization program (including supervision, scheduling and assignment of crew and support staff); insures that clients are eligible for services and notifying applicants if they are not eligible, participates in funding, budgeting and monitoring activities; and prepares reports monthly, quarterly and as needed. The Weatherization Manager reports to the Services Director.

Housing Manager - The Housing Manager is responsible for oversight and successful completion of all Housing Department contracts and the development of new projects as determined by community need. The Housing Manager reports to the Services Director.

Crew Leader-The Crew Leader is responsible for insuring that assigned housing projects are completed in a timely manner. The Crew Leader orders supplies, assigns staff, and insures that work plans are completed in compliance with applicable rules and regulations. The Crew Leader reports to the Housing Manager.

Weatherization Field Supervisor- The Weatherization Field Supervisor completes weatherization evaluations as assigned, submits accurate paperwork to describe scope of work to be done, prepares work plans, schedules work on approved projects, supervises weatherization crew, completes reports as required, treats each client with dignity and respect. The Weatherization Field Supervisor reports to the Weatherization Manager.

Weatherization Assessor/Inspector- The Weatherization Assessor/Inspector assigns a weatherization team to evaluate the home, completes the NEAT/MHEA audit, works with others

to develop the work plan, orders materials, and completes the final inspection. Provides reports, orders and picks up materials as needed, insures compliance with program requirements and treats each client with dignity and respect. The Weatherization Assessor/Inspector reports to the Weatherization Manager.

Weatherization Installer- The Weatherization Installer carries out weatherization activities included in the work plan as assigned by the Weatherization Field Supervisor. The Weatherization Installer, based on specific training and experience in weatherization or construction, is able to implement work plans with general direction from the Weatherization Field Supervisor. Adheres to work schedules on approved projects. Performs construction and weatherization work neatly and carefully, working in a manner so that the homeowners are treated with dignity and respect. The WX Installer reports to the Weatherization Field Supervisor.

Weatherization/Housing Laborer- The Weatherization/Housing Laborer is responsible for assisting with rehabilitation or weatherization activities as assigned by the Housing Crew Leader or Weatherization Field Supervisor. Assists with blower door set-up for weatherization evaluation. Assists with work program for home rehabilitation as assigned by the work supervisor. Adheres to work schedules on approved projects. Performs construction and weatherization work neatly and carefully, working in a manner so that the homeowners are treated with dignity and respect. The WX Laborer reports to the Weatherization Field Supervisor and the Housing Laborer reports to the Housing Crew Leader.

Weatherization/Housing Clerk- The Weatherization/Housing Clerk assists clients with making application for services, provides clerical support to the Weatherization and Housing Managers, completes assigned tasks (including telephone, filing letters and greeting the public) completes monthly and quarterly reports and data input. The Weatherization/Housing Clerk reports to the Weatherization Manager.

Weatherization Client Educator- The Weatherization Client Educator provides training and information to weatherization clients and other eligible persons concerning energy saving techniques. The Weatherization Client Educator works with other programs including Head Start, Tax Assistance, Emergency Assistance, Prescription Assistance to provide them with information concerning energy savings activities that the consumer could implement to save energy. The Weatherization Client Educator reports to the Weatherization Manager.

Prescription Assistance Regional Area Director - The Regional Area Director (RAD) for the RX Patient Assistance Program is responsible for providing support, direction and technical assistance to RX for Oklahoma staff throughout the Region 3 Area. The RAD reviews, checks and approves monthly financial and progress reports for the 18 county area and submits these to the Oklahoma Department of Commerce. The RAD establishes policy, procedures and direction for Region 3. The RAD reports to the Services Director.

Customer Service Representative for Prescription Assistance Program-The Customer Service Representative is responsible for completing applications and entering data into the RX Assist Program. The Customer Service Representative completes the monthly and quarterly reports and provides follow up on medications as required. The CSR reports to the RAD.

Homeownership Center Coordinator – The Homeownership Center Coordinator is responsible for scheduling and conducting Homebuyer Education classes, providing guidance for individuals pursuing homeownership, and maintaining records and database information for Housing and Weatherization. The Homeownership Center Coordinator reports to the Services Director.

Economic Developer-The Economic Developer works with individuals interested in starting a business as well as finding ways to encourage new business development in the area through collaboration with others with economic development interests. The Economic Developer reports to the Special Projects Director.

Health Care Systems Developer-The Health Care Systems Developer is responsible for carrying out activities that result in the design and application for federal funds for the development of a Federally Qualified Health Clinic (FQHC) for the area. Activities include working with other community and health care leaders, developing materials for organizational structure and designing a grant application for the funding of the FQHC. The Health Care Systems Developer reports to the Special Projects Director.

Database Specialist-The Data Specialist assist the Agency in maintaining a variety of client databases including CAPILOT, CAPTAIN, CAP systems, HMIS and other agency databases. The Database Specialist is also responsible for training and implementation of the new CAPTAIN database, and other duties as assigned. The Database Specialist reports to the Special Projects Director.

Job Specialist-The Job Specialist works with unemployed or underemployed individuals to assist them in the job search process, in raising their job skills and in maintain long-term employment. The Job Specialist holds classes in job skills, maintains a network of local employers and other job related resources and coaches individuals toward higher levels of employability. The Job Specialist reports to the Special Projects Director.

Data Clerk/Receptionist-The Data Clerk/Receptionist assists the Agency in maintaining a variety of databases, including CAPILOT, CAPTAIN, HMIS, CAP Systems, inventory, and other databases. The data Clerk/Receptionist may also assist with check and requisition processing, greeting the public, answering the telephone, and other duties as assigned. The Data Clerk/Receptionist reports to the Special Projects Director.

Head Start Director - The Head Start Director is responsible for the overall operation of the Head Start Program and is directly responsible to the CAA Executive Director, relates and works with the Head Start Policy Council and the CAA Board of Directors as required. The Head Start Director supervises the Assistant Head Start Director, Human Resources Manager, Fiscal Manager, and the HealthCare/Nutrition Manager.

Assistant Head Start Director- Under the supervision of the Head Start Director, the Assistant Head Start Director has the overall responsibility for support services to the Head Start Program, including supervision of the Education Manager, Disabilities/Mental Health Manager, Quality Assurance/IT Manager, Data Manager and Family/Community Partnership Manager.

Human Resources Manager- Under the supervision of the Head Start Director, the Human Resources Manager ensures that all staff members possess the requisite skills, knowledge, and abilities to complete assigned tasks and that all relevant performance standards are met. The Human Resources Manager has the oversight responsibility for the Human Resources section of the Head Start Performance Standards.

Fiscal Manager- Under the supervision of the Head Start Director, the Fiscal Manager is responsible for processing financial transactions for Head Start, consistent with applicable regulations and generally accepted accounting procedures. This includes procurement, CACFP, In-Kind and assisting with the agency audit.

Education Manager - Under the supervision of the Assistant Head Start Director, the Education Manager serves as a support to and also provide assistance for the teachers to utilize appropriate, individualized classroom strategies and supervises the Education Coordinator/Mentor, Center Directors and Center Director/Teachers. The EM shares oversight and responsibility of the Education and Early Childhood Development Section of the Head Start Performance Standards with the Disabilities/Mental Health Manager.

Education Coordinator/Mentor- Under the supervision of the Education Manager, the Education Coordinator/Mentor provides guidance and training to teaching staff. Assisting classroom staff to ensure that teachers are utilizing appropriate, individualized classroom strategies.

Health Care/Nutrition Manager - Under the supervision of the Head Start Director, the Health Care/Nutrition Manager is responsible for managing the Child Health and Developmental Services Section of the Head Start Performance Standards for all centers and managing the plans for the assigned areas of Child Health and Safety, and Child Nutrition. The HCNM supervises Family Services Workers.

Family Community Partnership Manager-Under the supervision of the Assistant Head Start Director the FCPM is responsible for Family Community Partnership Performance Standard areas and for the Policy Council and supervises the EHS/HS Family Service Worker.

Disabilities/Mental Health Manager-Under the supervision of the Assistant Head Start Director, the DMH Manager is responsible for coordinating the Disabilities and Mental Health Program for all enrolled centers and the full implementation of section 1308 and 1304.24 of the Head Start Performance Standards.

Quality Assurance/IT Manager - Under the supervision of the Assistant Head Start Director, the Quality Assurance Manager has primary responsibility for procurement/inventory, coordination of technology, center compliance, maintaining record of repairs, ordering supplies and requesting bids.

Data Manager - Under supervision of the Assistant Head Start Director, the Data Manager assists with recording of client data into Child Plus databases, purchasing, production of reports, summarizing enrollment and attendance information, answering the phone, and other support activities.

Head Start/Early Head Start Center Director - The Head Start/Early Head Start Center Director is responsible for the overall operation of the Head Start Center with more than fifty (50) children,(except EHS/HSE) supervises the Teachers and support staff, and is directly responsible to the Education Manager.

Teacher/Center Director - The Teacher/Center Director has the responsibility for teaching a class as well as the overall operation of the Head Start center with fewer than fifty (50) children, supervising his/her Aide, the other Teacher (if applicable), and support personnel and is directly responsible to the Education Manager. This is the person responsible for a center with one or two classrooms.

Certified Teacher-The Certified Teacher is responsible for teaching a class of children in a classroom under contract with the Public School. He/She is responsible for supervising his/her Aide, and/or Substitute and is directly responsible to the Teacher/Center Director or Education Manager (whichever is applicable). Certified Teachers will possess a Baccalaureate Degree in Early Childhood Education or related field and have the appropriate endorsement on a valid Teaching License issued by the Oklahoma State Department of Education.

Teacher - The Teacher is responsible for teaching a class, supervising his/her Teacher Aide, and/or Substitute and is directly responsible to the Teacher/Center Director or Center Director (whichever is applicable).

Teacher Aide I - The Teacher Aide I is responsible for assisting with the overall operation of the classroom and is directly responsible to the Teacher.

Teacher Aide II - The Teacher Aide II is responsible for assisting with children who have special needs and/or behavioral problems. The Teacher Aide II is directly responsible to the Teacher Center Director or Center Director (whichever is applicable) and receives guidance for working with specific children from the Disabilities/Mental Health Manager.

Early Head Start Teacher- The Early Head Start Teacher is under the supervision of the Center Director and is responsible for the overall implementation of the Early Childhood Education curriculum and the classroom environment of infants & toddlers ages 6 weeks to 36 months.

Early Head Start Floater-The Early Head Start Floater is under the supervision of the Center Director and is responsible for assisting with the overall operation of the classroom, either in the absence of an EHS Teacher or on a daily basis to provide relief to Teachers out of the classroom.

Family Service Worker - Each Family Service Worker is responsible for the Health Program in her/his assigned centers, carrying out child and family support services, and for assisting with the Family Partnerships and Disabilities Services for enrolled children and families. The Family Service Worker works closely with the Teacher, center staff, Family Community Partnership, and the Disabilities/Mental Health Manager to ensure coordinated assistance. The Family Service Workers are supervised by the Health Care/ Nutrition Manager.

Cook - The Cook is responsible for the overall operation of the nutritional program in the Head Start center and maintaining documentation according to CACFP regulations. The Cook is directly responsible to the Teacher/Center Director or Center Director (whichever is applicable).

Cook Aide - The Cook Aide is responsible for assisting the Cook in the overall operation of the nutritional program in the Head Start Center, and is directly responsible to the Cook, Teacher/Center Director or Center Director (whichever is applicable).

Receptionist-The receptionist has primary responsibility for managing Child Plus, childcare data collection, tracking and billing and all other office duties as assigned. The receptionist is supervised by the Center Director.

A detailed job description is provided to each employee when hired. Job descriptions are on file in the central office. Salaries are based on duties and responsibilities assigned to the position, successful completion of the orientation period, and certifications and educational accomplishments as appropriate to the position. Head Start salary increases are given when supplemental funds are received for Cost of Living, Quality Improvement and/or Program Improvement with the approval of the Policy Council and the CAA Board of Directors. Cost of Living adjustments for other programs will be made as funds are available.

CHAPTER VI

PERSONNEL RECORDS

All agency personnel records will be maintained in a locked file. Personnel Records shall include, but not be limited to the following sections. Access to Personnel Records will be restricted to those having specific authority to see records as listed below.

PERSONNEL RECORDS

AUTHORITY TO VIEW

Sections -	1. Job Application/Description	Employee
	2. New Hire Paperwork	Supervisor (need to know)
	3. Evaluations/Discipline	Human Resources Manager
	4. Miscellaneous	Auditing/Investigating Agencies
	5. Payroll-Employment Status	Employee
		Supervisor (need to know)
		Human Resources Manager
		Auditing/Investigating Agencies
		Fiscal Staff
	6. Medical (separate file for confidentiality)	Employee
		Supervisor (needed for reasonable accommodation)
		Human Resources Manager
		Government agencies (conducting an investigation relevant to medical issues)
	7. OSBI /OKDHS/OCCS (separate file for confidentiality)	Employee
		Supervisor (needed for reasonable accommodation)
		Human Resources Manager
		Auditing/Investigating Agencies
	8. I-9 (separate file for confidentiality)	Employee
		Supervisor (needed for reasonable accommodation)
		Human Resources Manager
		Auditing/Investigating Agencies
	9. Training/Professional Development (separate file)	Employee
		Supervisor (needed for reasonable Accommodation)
		Human Resources Manager
		Auditing/Investigating Agencies
		Career Development Manager

The employee has the right to a copy of any information that is in his/her personnel records, except for job references. In some instances, copies of personnel record information may be kept in the Head Start center to comply with DHS licensing regulations. The Teacher/Center Director or the Center Director is responsible for maintaining confidentiality of these records. If Department of Health & Human Services regulations override State guidelines, Head Start will follow DHHS regulations.

CHAPTER VII

EMPLOYEE BENEFITS

For the purpose of employee benefits, all employees will be assigned to one of three work categories.

Group A - NEOCAA Agency Staff – will include all full-time agency staff members who are assigned to the Jay Office, Early Head Start staff and all Family Service Workers assigned to Head Start Centers.

Group B – NEOCAA Agency Center Staff – will include all full-time agency staff members who are assigned to Head Start Centers.

Group C-other NEOCAA Staff-will include all temporary, part time and substitute staff. Not eligible for any leave and only eligible for 403(b) benefits contribution and match after one (1) year and have worked at least 1000 hours per year.

Annual Leave

Group A – Will earn Annual Leave at the rate of 10 hours per month based on forty hours worked per week. Annual leave will be earned at a prorated amount (in the same ratio) when employees work less than forty hours per week. For example:

Hours worked Per week	# Hours earned per one (1) week worked
40	2.308
30	1.73
24	1.385
20	1.154

Holidays occurring during an employee's annual leave will not count against their annual leave. New employees shall not be allowed to use annual leave until successfully completing the orientation period.

Group B - Will be awarded annual leave at a rate of 24 hours per employment year (August 1 – July 31) on the first day of the employment year (August 1). Employees hired after August 1 will have leave prorated.

No annual leave may be taken in advance of being earned (leave is not considered earned until the end of the pay period). No annual leave may be taken during a period of disciplinary probation or suspension.

Unused annual leave may be accumulated and carried over from one program year to the next up to 240 hours. No employee may be paid for annual leave not taken except upon termination or resignation, which shall not exceed payment for 80 hours. Annual leave will be capped at 240 hours and no additional leave is accrued until the capped amount is reduced.

Group C- Not eligible for any leave

Employees must submit to their supervisor a written request for annual leave specifying the dates requested. **Leave must be taken in not less than half hour increments.** All requests must be approved or disapproved by the supervisor prior to the leave with Program Director or Executive Director Oversight. Leave is not considered approved until signed by the supervisor or Program Director /Executive Director. Annual Leave of 40 or more hours should be requested in writing at least two (2) weeks in advance of the leave date.

A cumulative annual leave record will be recorded bi-monthly for each employee and is available to the employee on their pay stubs and through a cumulative report provided to Center Directors and supervisors each pay period.

Sick Leave is defined as leave taken during an employee's personal illness or when the employee must provide care for an immediate/step family member. Sick Leave may also be taken for an employee's or immediate family member's medical or dental appointments. See page 10 for list of approved family. In the event of the death of an immediate family member (see pg 11 for definition of immediate family) and an employee has exhausted the three (3) bereavement leave days allowed, employees may use sick leave with approval from the Program Directors.

Group A – Will earn sick leave at the rate of 10 hours per month based on forty hours worked per week. Sick Leave will be earned at a prorated amount (in the same ratio as annual leave, see above) when employees work less than forty hours per week.

Group B - Sick Leave will be awarded at a rate of 80 hours per year (August 1 – July 31) on the first day of the employment year (August 1). Employees hired after August 1 will have leave prorated.

Group C - Not eligible for any leave.

Employees must notify their immediate supervisor when they are on sick leave. All requests must be approved or disapproved by the supervisor with Program Director /Executive Director Oversight. No sick leave may be taken in advance of being earned (leave is not considered earned until the end of the pay period). Sick leave of more than three (3) consecutive days must be substantiated by a doctor's statement. Employees exceeding days of earned sick leave will have time deducted from their annual leave until such leave is exhausted, then time will be counted as leave without pay.

Unused sick leave may be accumulated and carried over from one year to the next and capped at 240 hours. No employee will be paid for sick leave not taken upon termination.

A cumulative sick leave record will be recorded bi-monthly for each employee and is available to the employee on their pay stubs and through a cumulative report provided to Center Directors and supervisors each pay period.

Personal Leave is defined as leave designated for the use of NEOCAA Agency Staff (*Groups A and B*) who are not yet eligible to use annual leave. Personal Leave may only be used by employees on new hire orientation to take care of personal business or a family emergency not covered by other appropriate leave. The Program Director or Executive Director must give prior

approval for personal leave. In no case shall this leave exceed sixteen (16) hours in the first sixty (60) days.

Holidays-

Group A- NEOCAA Agency staff are paid the following Holidays during the year.

See Appendix F for holiday schedules

Leave Bank-Any CAA employee that has leave exceeding 240 hours of annual or sick leave will go into a designated leave bank to be used by employees that have exhausted all other leave and are in an extreme need. Leave used from the leave bank will be approved by the Program Directors and will be assessed on an individual basis.

It may be necessary to schedule some NEOCAA agency staff to work on designated holidays if Head Start centers are open. Holidays will be rescheduled for these employees by the Program/Executive Director. Holidays occurring during an employee's orientation period will be paid. Rescheduled holidays may be carried over into next year.

Group B- NEOCAA Agency center staff are being paid to work a designated number of hours to be scheduled and included in a wage agreement that begins August 1. As such, there are no paid holidays for Head Start center staff and this schedule will reflect days to be worked and not worked which will coincide with the local public school schedule.

Group C- Will not be paid for any holidays.

Shared Leave - Employees may share a portion of their accrued annual or sick leave with another employee who has exhausted their own annual, sick, and personal leave due to extraordinary circumstances such as illness or surgery for themselves or family member. Sharing annual leave is voluntary. The use of shared annual or sick leave must be approved by the Program Director and/or Executive Director. The maximum amount of shared leave allowed is 8 hours per pay period per person.

Education Leave – A Head Start employee may request to use annual and/or sick leave to complete internship/practicum requirements for a Baccalaureate degree in Early Childhood Education. Approval must be given by the Head Start Director and/or Executive Director the semester prior to the beginning of internship if it benefits the agency. Shared Leave may also be made available to the employee on Education Leave if approved by the Head Start Director and/or Executive Director. The maximum amount of shared leave allowed is 8 hours per pay period.

In order to meet requirements for internships, the above flexibility will be considered to classroom staff; otherwise, classroom staff will be allowed to request up to one (1) hour a day to attend class. This must be at the end of the day, after children are gone. Each of these cases will require pre-approval from the Program Director before registering for class.

Family Medical Leave - An employee is covered by the FMLA after the employee has been employed for a cumulative period of twelve (12) months and has worked at least 1,250 hours in the 12 month period immediately preceding the commencement of the leave. Part time employees working fewer than 1,250 hours per year are not eligible.

In accordance with the Family Medical Leave Act of 1993, (revised 2009) FMLA provides certain employees with up to 12 workweeks of unpaid, job protected leave a year. The agency can require employees to take any accrued annual and or sick leave concurrently with any FMLA leave. FMLA is designed to help employees balance their work and family responsibilities by allowing them to take a reasonable unpaid leave for certain family and medical reasons. FMLA may be approved for the following:

1. For incapacity due to pregnancy, prenatal medical care or child birth; or
2. For placement with the employee of a child for adoption or foster care; or
3. To care for an immediate family member (spouse, child or parent) with a serious health condition; including
4. To take medical leave when the employee is unable to work because of a serious health condition; or member of the Armed Forces, including a member of the National Guard or Reserves, who is undergoing medical treatment, recuperation, or therapy, is otherwise in outpatient status, or is otherwise on the temporary disability retired list, for a serious injury or illness incurred in the line of duty.
5. Employees with a spouse, son/daughter or parent on active duty or call to active duty status in the National Guard or Reserves, in support of contingency operation to address certain qualifying exigencies including; attending certain military events, arranging for alternative childcare, addressing certain financial and legal arrangements, attending certain counseling sessions, and attending post-deployment reintegration briefings; (may take up to 26 workweeks for this)

This leave may be taken on an intermittent basis rather than all at once with the approval of the Program Director/Executive Director. During FMLA leave the agency must maintain the employee's existing health coverage under any "group health plan" on the same terms as if the employee has continued to work. Employee must pay their portion of monthly premiums. Upon return from FMLA leave, most employees must be restored to their original or equivalent positions with equivalent pay, benefits and other employment terms. If after completing the 12 weeks of leave, an employee is still not released to work with no restrictions, a notification of termination will be given.

Employees must provide 30 days advance notice of the need to take FMLA leave. The employer may initiate the employee to take FMLA, when applicable after three (3) consecutive absences. All required paperwork and medical releases must be submitted to the office for approval before any employee returns to work.

No annual or sick Leave will accrue during any leave of absence without pay. Holiday pay will not be granted during any leave of absence without pay. To the extent an employee has leave, they will continue to accrue annual, sick and holiday leave.

For additional guidelines, conditions, facts and forms, contact the Human Resources Manager.

Bereavement Leave - The Program Directors/Executive Director may grant up to twenty four (24) hours of paid Bereavement leave after the death of a family member or other with prior approval. (Refer to page 10 for list of approved family)

Inclement Emergency Weather - Head Start centers will follow the public school directive to close for inclement weather. The work schedule for employees in Head Start centers will be rescheduled to ensure the total number of annual work hours is fulfilled. Center employees will not be allowed to take annual or sick leave for inclement weather. The agency office will be open during inclement weather. Group A employees are expected to report for work on these days; however, if they are unable to get to work due to inclement weather, they may take annual or sick leave; Office employees working less than 2000 hours and the Family Service Workers will be allowed to either reschedule or use allowable leave. In the event that the office is not accessible, the Executive Director and Head Start Director will make the decision to grant authorized emergency leave and no leave will be used.

Leave Without Pay - It is imperative staff attend work to fulfill the expectations of the program. Leave without pay may only be taken with prior approval by the Program Director/Executive Director. If leave without pay does not have prior approval from Program Director, it will result in a written reprimand and could result in termination.

It is the goal of Head Start to take care of the children and families. To the degree the employee is responsible for this goal, the abuse or excessive use of annual leave, sick leave or leave without pay may be reflected on the employee annual performance evaluation.

Abuse of leave- Defined as an employee who uses leave in inappropriate ways i.e.; using leave as soon as it is earned and/or awarded, in conjunction with weekends and holidays and during scheduled training (pre-service, in-service, required agency training, etc.). A pattern of abuse will require written reprimand or other corrective, disciplinary action.

Jury Duty - Employees will receive full pay while on jury duty less the amount received for the jury duty. Employees will provide adequate documentation to their Program Director/Executive Director. Employees are allowed at least one half (1/2) day of leave to allow for travel time but must report to work whenever the court schedule permits.

Military Duty - An employee serving temporary military leave (15 days maximum) will not have the leave deducted from annual leave, upon presentation of adequate documentation to the Executive Director and Program Director. Upon return, an employee called to active military duty, will be provided with a comparable position.

Retirement/Annuity Plan - The agency will make available a Pre-tax Retirement/Annuity plan for all employees. Participation will be completely voluntary for the employee. After one year of employment, the agency will match up to 7% of the employee's gross salary (must work minimum of 1000 hours per year. If the employee chooses to contribute to the annuity plan, the employee must contribute a minimum of twenty-five dollars (\$25) per pay period or fifty (\$50) per month. New employees may voluntarily contribute to the plan however the employee

contribution must total a minimum of fifty dollars (\$50) per month until their one year anniversary. For details see Human Resources Manager.

Health/Medical Insurance Plan - The agency will make available a group Health/Medical Insurance Plan, including supplemental term life insurance, for all Full-time employees. Participation will be voluntary for the employee. The amount to be contributed by the agency, toward the cost of employee insurance premiums, will be determined by the Executive Director in coordination with the Program Directors based on availability of funds within the annual budget, and have approval from the Board of Directors. The employee may be required to pay a portion of the premium cost. The employee's share will be based on the employee's scheduled number of working hours annualized, when less than forty (40) hours per week and/or less than twelve months annually. Employees are eligible to enroll in the Health/Medical Insurance Plan after successfully completing sixty (60) working days of employment or at option period. Coverage is effective the first of the month following the completion of orientation. To stay competitive among the Public Schools for certified teachers, any new hire (certified teachers only) that is currently enrolled in Health Choice will have the option to pay **entire** premium and enroll in Health Choice immediately, however Health Choice will only allow this for one (1) month. For additional information or clarification of benefits, all employees should contact the Human Resources Manager.

Employees who are already covered by their spouse's group insurance or are eligible for Indian Health Services, and choose not to enroll in the agency's group Health/Medical Insurance Plan may elect to receive other optional benefits up to \$100 per month. Additional insurance is available on a voluntary basis and at the employee's expense such as: accident, life insurance, disability, cancer, heart/stroke, legal and motor club.

See Appendix A for a breakdown of the amount of insurance the agency will pay and the amount the employee must pay. In the event an employee were off work without pay, all insurance premiums must be paid in full by the employee or insurance coverage may be cancelled.

When an employee who is enrolled in the Health/Medical Insurance Plan is no longer employed by the agency, the employee has the right to retain insurance coverage under COBRA, if desired. The employee is responsible for payment of the premiums (all questions and correspondence will be conducted through the Health Choice benefit office).

The Health Choice Medical Plan and the Holmes Organisation anniversary date is January 1. Changes are not allowed except at Option Period unless it is necessary or appropriate as a result of a Qualifying Event, i.e., change in your legal marital status, change in your number of dependents (birth or death), changes in residence (out of state), termination of spouse's employment, and/or loss of other group coverage.

Workers Compensation is provided for all employees working for the agency. Any injured employee will notify his/her supervisor/Program Director/Executive Director immediately to file a report regarding any injury. The accident report must be completed by the employee at the

time of the incident and submitted to the office within 24 hours. If medical attention is required employee must complete a Form 2. Please see the Fiscal Assistant for any questions.

Social Security and Medicare - Both the employer and the employee must pay Social Security and Medicare at the prevailing rate. The rate will be charged on the maximum wages subject to the tax in that year. The agency is exempt from these taxes for any employees hired after February 2010 through January 2011, that was unemployed sixty (60) days prior to employment with the agency and have completed a W-11 form.

Unemployment Compensation - The Agency will pay unemployment compensation on all employees. All terminated employees are by law eligible to file their claim with the Oklahoma State Employment Agency.

Outside Employment - Any employee of the agency may pursue outside employment abiding by the following instructions.

- A. Supervisor must be notified of outside work schedule.
- B. Must not interfere with the efficient performance of the employee's duties in the employment of the agency.
- C. Such employment shall not involve a conflict of interest with the employee's duties.
- D. Such employment shall not involve the performance of duties which the employee should perform as part of his employment in the agency.
- E. Such employment shall not occur during the employee's regular or assigned working hours in the agency, unless the management staff member is on annual leave or leave without pay during the entire day on which outside employment occurs.
- F. Any employee of the agency must be readily available to attend any training sessions relative to their particular program, and must be available to attend necessary meetings, after working hours.

CHAPTER VIII

EMPLOYEE EXPENSES - TRAVEL AND TRANSPORTATION

The per diem, travel and transportation allowances established by the Oklahoma Department of Commerce Rules & Regulations as provided to the agency will be followed.

Travel on official business should be by the method of transportation which will result in the greatest advantage to the agency, cost and other factors considered.

The mileage reimbursement rate paid to employees, for utilization of their personal vehicle on agency business will be at the current rate allowed by the Policies and Procedures of the appropriate authority. Necessary allowances for turnpike fees will be approved. Travel allowances which the agency may pay include fares, rental fees, taxi to and from an airport, parking, fax, telephone, hotel, per diem rates, and other expenses set forth by the appropriate authority. Every effort must be made to keep expenses at a minimum by car-pooling.

Travel to conferences and meetings outside the service area must be authorized, by the Program Director/Executive Director prior to such travel. A board member will approve the Executive Director's travel. A Request for Advance Travel Expenses form can be submitted by the employee for approval by the Program Director/Executive Director. When estimated expense funds have been advanced, the employee must complete an Out of Town Travel Voucher upon return, attaching hotel receipts and any other required documentation to verify attendance and expenditures. If allowable expenses have exceeded the advance, the employee will be reimbursed; if expenses were less than anticipated, the employee must repay the excess expense money to the agency at the time the Out of Town Travel Voucher is finalized.

CHAPTER IX

HOURS OF WORK, OVERTIME AND PAYROLL PROCEDURES

The regular work week begins on Tuesday, 12:01 a.m. and ends on Monday 11:59 p.m. The regular work week for the Weatherization Field Supervisor, Weatherization Installers and Weatherization/Housing Laborers will begin on Monday, 12:01 a.m. and ends on Sunday 11:59 p.m. The office hours are 8:00 am - 4:30 p.m., Monday through Friday. Center hours are determined by local need with approval of the Head Start Director. During the months of June and July only, office management staff will have the option of working four (4) ten (10) hour days. The office will remain open Monday through Friday.

The full time work week will be forty hours. The employee's work schedule may be adjusted to include work during non-regularly scheduled hours to comply with their job duties; i.e. to attend parent meetings and home visits, or other work related required activities, etc. The work week will not exceed 40 hours. Any change in the regular schedule must be approved by supervisory staff as designated by the Program Directors.

Employees subject to the provisions of the Fair Labor Standards Act 1938 as amended (nonexempt employees) will be paid overtime for all hours worked in excess of forty (40) hours in a regular work week at a rate not less than 1½ times the employee's rate of pay. Supervisors will not permit overtime to be worked by nonexempt employees without proper advance authorization from the Program Director/Executive Director.

Employees whose salary is paid through a cost allocation method will keep an accurate account of actual hours worked, any allocation of time by funding source(s) and a brief description of daily activities. Employees who are paid from more than one funding source will have their wages distributed by through the accounting system according to board approved cost allocation plan. All employees paid with ARRA funds will specify hours worked accordingly on time sheet.

Pay periods will end on the 15th and last working day of each month. If a pay period ends on the weekend, the pay period will end on the preceding Friday. Employees will receive paychecks on the 5th and the 20th of the month. When payday falls on a Saturday, checks will be issued the preceding Friday. When payday falls on Sunday, checks will be issued the preceding Friday, if possible. If a Holiday falls on the scheduled issue date, paychecks will be dated and issued on the last working day prior to the scheduled payday. A separate payroll will be prepared for Weatherization laborers consistent with Davis Bacon requirements.

Mandatory deductions such as federal and state taxes, social security and Medicare will be made as required by law. Voluntary pre-tax salary reductions may be taken for the purpose of health insurance and/or retirement annuity.

Each employee is responsible for documenting their time worked on the approved time sheet. The time sheet is verified and signed by the immediate supervisor, and approved by the Program Director and/or the Executive Director. A board member will approve the Executive Director's time sheet. Incorrect time sheets may result in a delay of payment.

Checks are directly deposited into bank account(s) or a Wal-Mart Money Card issued by GE Money Bank as authorized for all employees effective March 4, 2011. Final checks must be picked up at the agency office, unless the exit interview has been completed.

CHAPTER X

TRAINING, PROFESSIONAL DEVELOPMENT AND PERFORMANCE EVALUATIONS

Training - Training will be made available to enable staff to develop skills and expertise necessary to improve job performance. Attendance at meetings, including in-service training is an important means for staff development, and is mandatory. Expenses may be paid by the agency within budget limitations. Each program may have different training requirements.

All Head Start employees must have orientation and ongoing relevant training as required by DHS Licensing, CACFP, and Head Start Performance Standards and the Head Start Act.

All new staff and volunteers receive an orientation which includes the goals and philosophy of the agency, the program they are associated with, and the expectations of their involvement, including Standards of Conduct in the program.

Ongoing training is provided and will ensure that Head Start staff have the opportunity to acquire the knowledge and skills necessary to implement the content of the Head Start Program Performance Standards and DHS Licensing Requirements, including methods for identifying and reporting child abuse and neglect, planning for successful child and family transitions into and from the Head Start program, and Basic First Aid and CPR. Academic credit will be attached to training whenever possible. Employees who work directly with children are mandated to pursue their Child Development Associate (CDA) credential as early as possible in their career. Classroom employees must begin participating in CDA training after one year of employment, when training is made available, and must be prepared for CDA assessment within two years after beginning training. Professional Development Plans will be developed for each employee annually and monitored regularly. All employees are strongly encouraged to further their college education. Tuition may be paid in whole or in part for some college courses for Head Start employees who are pursuing a degree in Early Childhood Education, Child Development and/or a degree relative to their job description, depending on the availability of funds after financial aid has been exhausted. Employees will be rewarded for certifications and degrees they receive as referenced in the attached pay scale after they submit and official copy of their transcript or certification. Pay increase will be effective in the pay period in which proper documentation was received by the Human Resources Manager. An expired CDA certificate could result in reduction in pay, until renewal is complete.

The goal of NEOCAA, Inc Head Start is to support staff in their efforts to participate in college courses to increase the knowledge and skills they need to perform their assigned functions. All staff are eligible to request financial support for educational purposes however, with new educational requirements which are targeted toward teaching staff, preference will be given to those who help meet the requirements depending on availability of funds. See Policies and Procedures/Professional Development/College Classes for more detailed information regarding this policy.

Orientation and ongoing training is also provided to the Community Action Board of Directors and the Policy Council to enable them to carry out their program governance responsibilities effectively.

Promotions and Transfers - Position vacancies may be filled by promotion or transfer of qualified employees within the agency. Position vacancies will be posted throughout the entire agency, as well as on parent boards in Head Start facilities, for parents to view. Present staff may apply for any vacant position and may receive consideration for promotion or transfer if the employee has the qualifications and appropriate work history to fill the vacancy. Current employees who are promoted or transfer into a new position will be subject to a sixty (60) working day orientation period. Salary and fringe benefits will take effect the beginning of the following pay period.

Performance Evaluations - Performance evaluations are designed to improve the employee's performance, enhance supervisor/employee communications, and may determine appropriate action concerning promotions, demotions, salary increases and dismissals. The performance evaluations are based on the job description, written tasks and responsibilities agreed to by the supervisor and the employee at the beginning of the review period. The evaluation includes the employees' performance of tasks and responsibilities, areas of improvement, and tangible goals for improvement to be accomplished by the next review period. All performance evaluations are kept in the employee's personnel file, as well as copies as some Head Start facilities, kept in separate location for confidentiality.

- A. A written performance evaluation of each new employee will be performed by his/her immediate supervisor at the end of thirty (30) working days and again ten (10) working days prior to completion of the orientation period.
- B. An employee who accepts a new job position will receive a written evaluation at the end of thirty (30) working days and again ten (10) working days prior to completion of the orientation period.
- C. Each employee will complete an annual self-evaluation. The immediate supervisor will complete a separate annual written evaluation of the employee. The employee and supervisor will discuss the performance evaluations and both employee and supervisor will sign both copies. The supervisor may review the employee more frequently than annually if the supervisor determines that more frequent performance reviews are needed.
- D. The CAA Board of Directors is responsible for reviewing the performance annually of the Executive Director.

CHAPTER XI

EMPLOYEE CONDUCT

Employee Conduct

The standard of employee conduct will be that normally required in any place of employment. An employee shall refrain from any action and avoid any kind of public pronouncement which reflects adversely upon Northeast Oklahoma Community Action Agency, Inc. and its programs. The Northeast Oklahoma Community Action Agency promotes a safe workplace environment for clients, volunteers, employees and vendors. Improper conduct may result in disciplinary action. See Chapter XIV-Terminations

In accordance with the agency's mission to assist low-income families to achieve self-sufficiency, it is imperative that all staff interact with clients, each other, and the general public in a professional manner. Employees must respect and promote the unique identity of each client, child, employee, and family and refrain from stereotyping on the basis of gender, race, ethnicity, culture, religion, or disability. In addition Head Start must comply with the Code of Conduct. It is likewise imperative that demeaning, comparative, and derogatory statements, as well as sharing confidential information will not be tolerated by the agency.

In addition, Head Start employees must ensure that no child be left alone or unsupervised while under their care, and ensure that an adult is present at home when a child is taken home. They must use positive methods of child guidance and not engage in or allow corporal punishment, emotional or physical abuse, or humiliation of any child or family member. Staff members are prohibited from using any method of discipline that involves isolation, the use of food as punishment or reward, or the denial of basic needs. Employees working with children must comply with the Head Start Program's written plan for reporting child abuse or child sexual abuse, which is in accordance with Oklahoma State Law. (Child Abuse Prevention Plan is located in the Head Start Policies and Procedures Manual.

All employees will be issued a picture identification badge that is to be worn when visiting the Head Start centers, or out in public when performing Head Start duties.

See related information in Chapter XIV– Terminations

Internet and E-mail Usage - NEOCAA is committed to utilization of new technologies and provides a variety of electronic tools for employees whose job performance would be enhanced by the technology. NEOCAA electronic communications tools are agency property paid for by public and agency funds and are primarily intended for business-related purposes. All internet data and e-mail transactions conducted using NEOCAA equipment and Internet access are considered to be part of the official records of NEOCAA and, as such, are subject to monitor and disclosure to law enforcement or other third parties. Consequently, employees should always ensure that the business information contained in Internet e-mail messages and other transmissions is accurate, appropriate ethical and lawful. Abuse of the internet access or e-mail provided by NEOCAA in violation of law or agency policies will result in disciplinary action, up

to and including termination of employment. See Appendix C for more detailed information regarding these policies.

Confidentiality - In keeping with NEOCAA, we respect and will protect every client's right to have all the information they share with agency employees to be kept confidential and we respect and will protect every employee's right to have all the protected personal information they share with the agency to be kept confidential. See Appendix D for more detailed information regarding this policy. In terms of confidential information, such information will not be released to anyone, unless related to the performance of one's job responsibilities, without written permission of the individuals involved and/or the agency. Disciplinary action will be taken if this rule is violated.

Personal Cell Phone Usage- Cell phone abuse is unacceptable. Center staff cell phone use is prohibited at all centers when their school is in session. The center director may approve exceptions such as field trips, emergencies, etc. Any violation will result in disciplinary action.

Smoke Free Environment

Northeast Oklahoma Community Action Agency, Inc. is dedicated to providing a healthy, comfortable, and productive environment for staff, clients, and program children and their families. Smoking and secondhand smoke have been identified as significant health problems in the United States contributing to heart attack, stroke, high blood pressure, emphysema, several forms of cancer and premature death. The agency is concerned about the health of its employees and recognizes the importance of positive role-modeling for children. Therefore, all Community Action and Head Start facilities and offices are smoke-free. Smoking is prohibited on any agency property (buildings, grounds, and agency-owned vehicles).

In order to protect the health and safety of the children, all Head Start employees are not authorized to smoke during working hours.

NEOCAA will assist staff members that wish to quit smoking by facilitating access to recommended smoking cessation programs and materials.

Dangerous Weapons

No dangerous weapons will be brought on any properties where this agency conducts business, including offices, classrooms, parking areas, outdoor grounds vehicles, etc. Dangerous weapons include guns, knives or any other implement meant to do physical harm. When private vehicles owned by non-employees are used for field trips or other agency sponsored activities, owners will be required to sign a statement, witnessed by a staff person, assuring that no dangerous weapons are present in those vehicles on that date. Staff must not have a concealed weapon on their person, in their vehicle, in any classroom, or any other place, during working hours or while they are on Head Start business. Violation of this policy will be grounds for immediate dismissal.

Dress Code

All Community Action Agency staff will dress within the following guidelines during working hours.

- All clothing must be clean, neat and free of holes.
- During warm weather, staff may wear shorts if they are within 4" of the top of the knee, in good repair and hemmed. Biker shorts are not permissible.
- Dresses and skirts may be worn if they are within 4 " of the top of the knee.
- Jeans and slacks may be worn if they are in good repair and hemmed. Length of pants, appropriate for the individual's job performance will be determined by Program Directors based on work assignment.
- At no time should shorts or skirts be above 4" of the top of the knee.
- Shirts that advertise alcohol or tobacco or have other objectionable words are not allowed, as well as any other type of shirt that reveals the bra straps.
- All clothing must fit properly, without pulling too snugly, or hanging too loosely, at no time will the midriff, cleavages, and/or back area be showing.
- It is permissible to wear nice wind-suits or sweat suits, as long as they are well fitting and not too worn.
- Clothing must not prohibit staff from sitting on the floor with children.
- Hair nets must be worn in the kitchen.
- Jewelry such as facial or a tongue piercing that are deemed questionable or inappropriate will not be allowed. This will be left up to the discretion of the Supervisor and Program Director.
- Body markings, such as tattoos that use inappropriate language or graphic images will not be allowed. This will be left up to the discretion of the Supervisor and Program Director.

Certain additional restrictions apply to Cooks and Cook Aides:

- No open toe shoes or sandals
- No sleeveless shirts
- Hair nets must be worn at all times (this also applies to all staff while they are preparing Or serving food)
- No rings, earrings, bracelets, or fingernail polish may be worn
- Aprons must be worn while food is being prepared

All staff persons represent the agency wherever they are working, be it in the office, the classroom, the doctor's office, or the public school. Each employee of the agency is considered a professional. Employees will come to work dressed in such a way that reflects their professionalism and is not offensive in nature.

Gifts and Gratuities

Employees are prohibited from soliciting or accepting gratuities, favors, or anything of monetary value from contractors, or parties to sub-agreements. However, employees may accept unsolicited gifts of nominal value (\$10.00 or less). Violation of this prohibition will result in a written reprimand to the employee. Suspension or termination may be considered based upon the severity of the violation. See 45 CFR parts 74.42,92.36 (b)(3) Codes of Conduct.

CHAPTER XII

DRUG FREE WORKPLACE POLICY

Substance Abuse Policy Statement

Northeast Oklahoma Community Action Agency, Inc. (NEOCAA) is committed to providing a safe work environment and to fostering the well-being and health of its employees. That commitment is jeopardized when any NEOCAA employee illegally uses drugs on or off the job, comes to work under the influence, possesses, distributes or sells drugs in the workplace, or abuses alcohol on the job. Therefore, NEOCAA has established the following policy:

1. It is a violation of company policy for any employee to use, possess, sell, trade offer for sale, or offer to buy illegal drugs or otherwise engage in the illegal use of drugs on or off the job.
2. It is a violation of company policy for any employee to report to work under the influence of or while possessing in his or her body, blood or urine illegal drugs on or off the job.
3. It is a violation of company policy for any employee to report to work under the influence of or impaired by alcohol.
4. It is a violation of the company policy for any employee to use prescription drugs illegally, i.e., to use prescription drugs that have not been legally obtained or in a manner or for a purpose other than prescribed. (However, nothing in this policy precludes the appropriate use of legally prescribed medications.)
5. Violations of this policy are subject to disciplinary action up to and including termination. If an employee test positive for drugs or alcohol, then the employee will be terminated.
6. **EMPLOYEE ASSISTANCE**
The company offers resource information on various means of employee assistance in our community, including but not limited to drug and alcohol abuse programs. Employees are encouraged to use this resource file, which is located at the CAA office and each Head Start Center Director's Office. In addition we will distribute this information to employees for their confidential use, as requested by the employee.
7. **GENERAL PROCEDURES**
An employee reporting to work visibly impaired will be deemed unable to properly perform required duties and will not be allowed to work. If possible, the employee's supervisor will first seek another supervisor's opinion to confirm the employee's status. Next the supervisor will consult privately with the employee to determine the cause of the observation, including whether substance abuse has occurred. If, in the opinion of the supervisor, the employee is considered impaired, the employee will be sent to a medical facility by taxi or other safe transportation alternative – depending on the determination of the observed impairment – and accompanied by the supervisor or another employee if

necessary. A drug test may be in order. An impaired employee will not be allowed to drive.

8. OPPORTUNITY TO CONTEST OR EXPLAIN TEST RESULTS

Employees and job applicants who have a positive confirmed test result may explain or contest the result to the company within five (5) working days after the company contacts the employee or job applicant and shows him/her the positive test result as it was received from the laboratory in writing.

9. CONFIDENTIALITY

The confidentiality of any information received by the employer through a substance abuse testing program shall be maintained, except as otherwise posted by law.

10. PRE-EMPLOYMENT DRUG SCREENING

All job applicants at this company will undergo pre-employment drug screening, for the presence of illegal drugs as a condition of employment. Any applicant with a confirmed positive screening will be denied employment.

Applicants will be required to submit voluntarily to a urinalysis at a laboratory chosen by this company, and by signing a consensual agreement, will release this company from liability.

If the physician, official, or lab personnel have reasonable suspicion to believe that the job applicant has tampered with the specimen, the applicant will not be considered for employment.

This company will not discriminate against applicants for employment because of a past history of drug abuse. It is the *current* abuse of drugs, preventing employees from performing their job properly, that this company will not tolerate.

Individuals who have failed a pre-employment screening may initiate another inquiry with the company after a period of not shorter than six (6) months; but they must present themselves drug-free as demonstrated by urinalysis or other test selected by this company.

11. FOR CAUSE EMPLOYEE TESTING

This company has adopted testing practices to identify employees who use illegal drugs on or off the job or who abuse alcohol on the job. It shall be a condition of employment for all employees to submit to substance abuse testing under the following circumstances:

- A. When there is reasonable suspicion to believe that an employee is using illegal drugs or abusing alcohol. "Reasonable suspicion" is based on a belief that an employee is using or has used drugs or alcohol in violation of the employer's policy drawn from specific objective and particularly facts and reasonable inferences drawn from those facts in light of experience. Among other things, such facts and inferences may be based upon, but not limited to, the following:
 1. Observable phenomena while at work such as direct observation of substance abuse or of the physical symptoms or manifestations of being impaired due to substance abuse;

2. Abnormal conduct or erratic behavior while at work or a significant deterioration in work performance;
 3. A report of substance abuse provided by a reliable and credible source;
 4. Evidence that an individual has tampered with any substance abuse test during his or her employment with the current employer;
 5. Information that an employee has caused or contributed to an accident while at work; or
 6. Evidence that an employee has used, possessed, sold, solicited, or transferred drugs while working or while on the employer's premises or while operating the employer's vehicle, machinery, or equipment.
- B. When employees have caused or contributed to an on-the-job injury that resulted in a loss of work time, which means any period of time during which an employee stops performing the normal duties of employment and leaves the place of employment to seek care from a licensed medical provider. The company may also send employees for a substance abuse test if they are involved in on-the-job accidents where personal injury or damage to company property occurs.
- C. Employees with a confirmed positive test result may, at their option and expense, Have a second confirmation test made on the same specimen. An employee will not be allowed to submit another specimen for testing.

If the physician, official, or lab personnel have reasonable suspicion to believe that the employee has tampered with the specimen, the employee is subject to disciplinary action up to and including termination.

11. ALCOHOL ABUSE

The consumption or possession of alcoholic beverages on this company's premises is prohibited. An employee whose normal faculties are impaired due to the consumption of alcoholic beverages while on duty/company business shall be guilty of misconduct, and shall be subject to discipline up to and including termination. Failure to submit to a required substance abuse test also is considered misconduct and shall be subject to discipline up to and including termination.

The goal of this policy is to balance our respect for individuals with the need to maintain a safe, productive, and drug-free environment. The intent of this policy is to offer a helping hand to those who need it, while sending a clear message that the illegal use of drugs and the abuse of alcohol are incompatible with employment at NEOCAA, Inc.

CHAPTER XIII

EMPLOYEE DISCIPLINE

All employees must follow all directives issued by their supervisor. All directives are expected to be issued in a fair and impartial manner.

- A. Policy: As the basic standard of justice in the Agency, employees are to be informed of the behavior expected of them and the rules, regulations, policies, procedures, and practices by which they must abide. Disciplinary action results from failure to abide by such. All employees must comply with agency policies and procedures governing the programs in which they work. For instance, Head Start employees must comply with the NEOCAA Head Start Policies and Procedures, Head Start Performance Standards, CACFP Regulations, and DHS Licensing regulations. Disciplinary action may result from failure to adhere to these regulations.
- B. Practice: It will be the practice of the Agency to put in writing its rules, regulations, policies, procedures and practices. All new employees will be oriented to such at the time of employment.
- C. Conduct: The standard of employee conduct normally required in any place of employment will be the standards of employee conduct of the Agency, whether or not such are written. Violation of the standards specified in Chapter XI Employee Conduct may be cause for disciplinary action.
- D. Disciplinary Action: Disciplinary action will be one of the following:
1. Reprimand
 2. Disciplinary Probation
 3. Suspension
 4. Termination

Escape Clause- NEOCAA reserves the right to administer discipline appropriate to circumstances, and at the agency sole discretion may not always follow the particular order of discipline.

Reprimands: A reprimand is designed to correct performance or conduct problems. A reprimand is the first step of disciplinary action and is not considered a grievance.

- a. Verbal and written reprimands are documented on a reprimand form, signed by both employee and supervisor, and placed in the employees Personnel File. All verbal reprimands are removed after twelve (12) months, if no other action has occurred.
- b. Disciplinary documents that will be placed in an employee's file require the Supervisor's, the Employee's, and the Head Start/Executive Director's signatures. An employee's signature only signifies that the employee has seen the document and

- it has been explained to them. Signing the document does not necessarily mean the employee agree to all or any part of the document. Failure to sign a disciplinary document by the employee will result in the supervisor to summon a witness and provide documentation to the document that the employee refused to sign. Failure of the employee to sign the document within twenty four (24) hours will result in cause for termination.
- c. Any two written reprimands in any twelve month period automatically place the employee on disciplinary probation. Any three reprimands in any twelve month period is cause for termination.
 - d. The employee's immediate supervisor initiates a reprimand. The Program Director/Executive Director's concurring signature is required.

If an employee refuses to sign any reprimand, the supervisor shall obtain a witness to sign A statement stating such at the bottom of the reprimand form. All original forms must be Sent to the Human Resources Manager to be signed by the Head Start Director and placed in the employee personnel file.

Disciplinary Probation:

- a. Disciplinary probation is issued in writing, signed by the employee with a copy given to the employee and must contain the specifics of the conduct for which the employee is being placed on probation, and the specific criteria which must be met for the employee to get off probation.
- b. Disciplinary probation is for a period of not more than 90 working days and may not be extended. At the end of the disciplinary probation period, the employee must be informed in writing that he/she has completed the probation satisfactorily, or that he/she is being terminated.
- c. Any two disciplinary probations is cause for termination.
- d. Employees placed on disciplinary probation are not eligible to take Annual Leave.
- e. The employee's immediate supervisor may initiate probation. The Program Director's concurring signature is required. Probations may be appealed to the level of the Executive Director and no higher, except when it results in termination and the Board may review those probations, on appeal of the termination, or if the Executive Director is involved in imposing penalty, appeal must go to the Board and its appointed committee.

Suspension: Suspension is a period of time when the employee does not work and is in a non-paid status. No employee will be suspended for more than thirty (30) days for any one offense.

- a. An employee may be suspended, when it has been established that he/she is in violation of written agency policy, is involved in an activity in opposition to the stated aims or goals of the agency; or if it is in the best interest of safety to themselves, those in their care, or co-workers, or the action is deemed appropriate by the Program Director and/or the Executive Director, in relation to the behavior. An

employee can be suspended on a verbal notice by the Program Director if necessary. Written notification must follow.

- b. The employee will be notified in writing with a letter containing the specific charges, length of suspension, effective date, and the employee's appeal rights. Any appeal is to be initiated by the employee and addressed to the Executive Director.
- c. A paid suspension will only apply in situations where an investigation from internal or external sources is necessary, pending closure of such investigation.
- d. Two suspensions without pay may be cause for termination.
- e. Employees on non-paid suspension are not eligible to use, and do not accrue, Leave.

Terminations: See Chapter XIV

CHAPTER XIV

TERMINATIONS

A Termination will be one of the following:

Involuntary Termination: All involuntary terminations will be authorized by the Program Director. All terminations are in writing, addressed to the employee containing specifics of the conduct for which the employee is being terminated, and inform the employee of his/her right to appeal the action, and the appropriate procedure. All involuntary terminations will receive pay for time already worked and pay for accrued Annual Leave. There will be no severance pay. All involuntary terminations are for one of these causes:

- A. Failure to abide by written Agency policy, job descriptions or activity in opposition to the stated aims or goals of the Agency.
- B. Inappropriate behavior, including but not limited to:
 - Use of alcoholic beverages or illegal drugs on the premises of the agency.
 - Appearing at work under the influence of alcoholic beverages, illegal drugs or hallucinogenic materials.
 - Possession of a dangerous weapon, including firearms.
 - Sexual harassment.
 - Fighting or attempting to injure others.
 - Falsifying or misusing records including applications.
 - Failure to meet the terms of orientation, performance evaluation, disciplinary probation, or suspension.
 - Excessive absenteeism and tardiness as demonstrated by pattern of abuse of leave.
 - Willful disobedience, defined as the intentional disregard of supervisory directives or willful refusal to comply with such directives.
 - Insubordination, defined as a general course of conduct evidencing disrespect, disdain, and/or contempt for administrators, supervisory personnel, and/or other proper authorities.
 - Job abandonment - The employee will be considered to have abandoned his/her position if he/she has not reported an absence to their immediate supervisor for two (2) consecutive days.
 - Any action that jeopardizes work place safety.
 - Violence, threats of violence, both physical and verbal.
 - Harassment, intimidation and other disruptive behavior.
 - Negative or derogatory attitude
- C. The administration of inappropriate discipline to children as follows is possible grounds for disciplinary action and/or termination of Head Start employees:
 - § Subjecting children to punishment of a physical nature, e.g., shaking, striking, spanking, squeezing, swatting, thumping, pinching, popping, shoving, spitting,

- biting, hair pulling, yanking, slamming, excessive exercise or any cruel treatment that may cause pain;
- § Putting anything in or on a child's mouth as punishment;
- § Restraining a child by any means other than holding and then for only as long as is necessary for the child to regain control;
- § Subjecting children to punishment of a psychological nature, e.g., humiliation by derogatory or sarcastic remarks about them or their families, race, gender, religion or cultural background;
- § Subjecting children to harsh or profane language or actual or implied threats of physical punishment;
- § Punishing and/or threatening children in association with food, rest or toilet training, or instructional time (outdoor time)
- § Isolating a child without supervision or place him or her in a dark area;
- § Permitting children to discipline other children;
- § Punishing an entire group due to the actions of a few children; and/or
- § Seeking or accepting parental permission to use any punishment or act prohibited by the requirements contained herein.

D. Abusing or neglecting a child. Child Abuse and Neglect is defined by DHS Licensing as:

Physical Abuse is non-accidental physical injury to a child.

Mental injury is an injury to a child's psychological growth and development. It is caused by a chronic pattern of behaviors, such as belittling, humiliating and ridiculing a child.

Neglect is the failure of the parent or caretaker to provide a child with basic needs such as food, clothing, shelter, medical care, protection and supervision.

Threatened harm means a substantial risk of harm to the child. It may include acts or expressions of intent to inflict actual harm presently or in the future.

Management staff or the immediate supervisor will have the authority to temporarily remove an employee from the direct care of children when inappropriate discipline or abuse is witnessed or reported. Such behavior will be documented and reported to the immediate supervisor, Program Director and/or DHS. The agency will conduct an internal investigation, report any findings to DHS and take appropriate disciplinary action up to and including termination. Employees who observe their supervisor using inappropriate discipline must report to the next level of authority (Teacher/Center Director, Center Director, or Program Director). Failure to report inappropriate discipline or abuse/neglect is grounds for possible disciplinary action.

Steps to Follow for Involuntary Termination:

The following steps will be followed prior to involuntary termination:

1. Immediate supervisor discusses the issues with the employee, consulting with the Program Director, if necessary.
2. The supervisor obtains statements from witnesses or those knowledgeable about the situation, if applicable.
3. All information is reviewed.
4. The employee is suspended or terminated in writing, if necessary.

Voluntary Termination: An employee that terminates their employment voluntarily must provide a letter of resignation and complete an exit interview with appropriate documentation. Employees terminating voluntarily are to receive any salary due plus payment for unused earned Annual Leave, in accordance with Chapter VII, Employees Benefits, of these Personnel Policies at the next regularly scheduled pay period.

Reduction in Force:

Fund availability issues in any program could require action to insure appropriate expenditures. Actions could include reductions in force, salary reductions, furloughs, etc or a combination of actions. The Program Director will recommend and the Executive Director and the Board of Directors will approve/disapprove any such actions. Staff members are employed to work for specific programs within the agency and actions may not be the same for all programs.

Involuntary terminations, reduction in force, salary reduction, furloughs, etc that affect Head Start employees must be approved by the Head Start Policy Council.

CHAPTER XV

GRIEVANCES

A Grievance is an employee's expression of dissatisfaction with the working conditions. The employee's grievance shall be given prompt and fair consideration in any case in which there is a claim of unfair treatment.

Grievance Process

1. Employee concerns and complaints should, whenever possible, be promptly and informally resolved at the lowest possible level of supervision.
2. If the employee and supervisor are unable to resolve the issue through informal discussion, the employee may, within ten (10) working days, submit the grievance in writing to the Program Director. The Program Director will request a written statement from the supervisor regarding his/her response to the employee's grievance. If the Program Director is unable to resolve the grievance within ten (10) working days of the receipt of both written accounts of the grievance, the employee may submit a written appeal to the Executive Director.
3. The written appeal to the Executive Director must be made within ten (10) working days of the previous action and include:
 - § Employee's name, address, and phone number.
 - § The classification of the employee.
 - § The employee's work location.
 - § The name of the employee's immediate supervisor with whom the employee informally discussed the grievance.
 - § A brief statement accurately describing the cause of the grievance and any other descriptive information
 - § Any laws, rules, or agency policies applicable to the grievance, if known.
 - § A proposed resolution of the grievance which would satisfy the employee.The Executive Director must respond within ten (10) working days.

CHAPTER XVI

ADVERSE ACTIONS, APPEAL PROCEDURES, INTERNAL DISPUTE RESOLUTION

An Adverse Action is a disciplinary action or personnel action initiated by management that results in actual loss or reduction of salary to an employee or adversely affects his/her career. An adverse action is transmitted to the employee in writing. The written notification contains all particulars of the adverse action, including the right of the employee to appeal.

There shall be only one appeal process. Employees other than employees on probation, Temporary employees, and Substitutes have the right to appeal the following actions taken in regard to him/her:

- § Transfer to another position
- § Disciplinary Probation
- § Suspension
- § Involuntary termination
- § Reduction in Force termination

Initial Appeal

The initial appeal must be made in writing to the Executive Director. The appeal must be made within ten (10) working days of the action. All appeals will have at least an initial review. The Executive Director must respond within ten (10) working days.

Second Appeal

If the action of the Executive Director is not satisfactory to the employee, the employee may appeal, in writing, within ten (10) working days to the Board of Directors. At this level of appeal, the employee may appear with legal counsel and has the right to hear the charges, evidence, witness statements against him/her, and has the right to cross examine.

The Board of Directors must respond within ten (10) workings days. The decision of the Board of Directors shall be final.

General Conditions

1. It is a violation of the policies of the Agency for any employee or member of the Board of Directors to interfere with, threaten, coerce, restrain, discharge or otherwise discriminate against any employee, or other person because he has filed a complaint, given testimony or otherwise appeared before the Board or any of it's committees in connection with a grievance or an appeal.
2. It is a violation of the policies of the Agency for any employee to try to influence the opinion or voting of any member of the Board regarding decisions that affect the Agency. Proven violations shall be grounds for disciplinary action. This policy specifically is intended to restrain employees from interfering with the decisions that

should be made by the entire Board of Directors of the Agency regarding administrative and policy decisions.

3. Complaints of discrimination are not subject to review through these procedures but are processed under the procedure outlined in the Agency's Affirmative Action Plan.

Internal Dispute Resolution (Impasse) -The agency has an Internal Dispute Resolution (Impasse) policy located in the Head Start Policies and Procedures Manual, under Program Governance, which has been approved by Policy Council and the Board of Directors.

AMENDMENTS

A. Operational Statement

This policy statement supersedes all previous personnel policies and becomes the official document of Northeast Oklahoma Community Action Agency, Inc.

B. Annual Review

These Personnel Policies will be reviewed annually by the Head Start Policy Council and Board of Directors Personnel Policies Committee of the Northeast Oklahoma Community Action Agency, Inc. They will make recommendations for amendments or approval as currently written with the Board of Directors having final approval.

C. Amendment Process

1. Amendments may be recommended at any regular meeting of the Policy Council or Board of Directors. A meeting of the Head Start Policy Council and Board of Directors Personnel Policies Committee will be held to review the proposed amendments and make recommendations for approval/disapproval.
2. Program Directors must have the opportunity to review and comment on the amendment(s) prior to consideration by the Board of Directors. The Head Start Policy Council will have the opportunity to review and approve/disapprove the amendment(s) which apply to Head Start as being appropriate for Head Start employees prior to consideration for adoption by the Board of Directors.
3. After study of the proposed amendment and comments from the Executive Director, Program Directors, and Head Start Policy Council Personnel Policies Committee, Board members, an amendment may be passed by a simple majority vote of the members present at any regular meeting, provided it meets the Agency's policy on meetings.

APPROVED AS AMENDED THIS 14th DAY OF FEBUARY
BY THE BOARD OF DIRECTORS

Wesley Allison, Board Chairman

APPENDIX A

APPENDIX A

Premium	Health Choice High	Employer	Monthly Out of Pocket	Per Pay Period
1936-2088				
Individual	449.48	305.00	144.48	72.24
Spouse	1,132.22	305.00	827.22	413.61
Child	677.68	305.00	372.68	186.34
Children	801.56	305.00	496.56	248.28
Spouse + Child	1,360.42	305.00	1,055.42	527.71
Spouse + Children	1,484.30	305.00	1,179.30	589.65
1520-1935				
Individual	449.48	285.00	164.48	82.24
Spouse	1,132.22	285.00	847.22	423.61
Child	677.68	285.00	392.68	196.34
Children	801.56	285.00	516.56	258.28
Spouse + Child	1,360.42	285.00	1,075.42	537.71
Spouse + Children	1,484.30	285.00	1,199.30	599.65

Premium	Health Choice Basic	Employer	Montly Out of Pocket	Per Pay Period
1936-2088				
Individual	391.64	305.00	86.64	43.32
Spouse	990.12	305.00	685.12	342.56
Child	593.46	305.00	288.46	144.23
Children	702.44	305.00	397.44	198.72
Spouse + Child	1,191.94	305.00	886.94	443.47
Spouse + Children	1,300.92	305.00	995.92	497.96
1520-1935				
Individual	391.64	285.00	106.64	53.32
Spouse	990.12	285.00	705.12	352.56
Child	593.46	285.00	308.46	154.23
Children	702.44	285.00	417.44	208.72
Spouse + Child	1,191.94	285.00	906.94	453.47
Spouse + Children	1,300.92	285.00	1,015.92	507.96

*Dental and Vision coverage is also availabel to employees covered major medical insurance with full premium being paid by the employee or Administrative Assistant for more detailed information.

Other Options		
**If you elect not to have Medical Coverage		
2088-1720	100.00	per month
1520-1719	80.00	per month
<i>Other Options Include:</i>		
Short-Term Disability, Accident, Cancer, Heart, Life & Legal		
Contact HRM for a complete list of options available through Holmes by phone (918) 253-4683 ext 17 or by e-mail khelsel@neocaa.org		

New employees will be paid based on this salary scale. Salary scale provides an increase for Educational Degree, CDA Certification, Early Childhood Certification, and level of responsibility for Center Directors and Cooks.

POSITION	BEGINNING HOURLY RATES	WITH CDA Additional \$ 0.15/hr.	WITH FSW CREDENTIAL Additional \$ 0.29/hr.	WITH AA In Child Development Additional \$ 0.15/hr.	WITH BA/BS in ECE or related field Additional \$ 1.00/hr.
Managers	12.05-23.30	12.20-23.45	NA	12.35-23.60	13.35-24.60
Center Director	13.79-22.76	13.94-22.91	NA	14.09-23.06	15.94-24.06
Certified Teacher	22.23	NA	NA	NA	NA
Teacher	12.99	13.14	NA	13.29	14.29
FSW I (Group A)	11.03	11.18	11.47	11.62	12.62
FSW II (Group B)	11.03	11.18	11.47	11.62	12.62
Teacher Aide I	9.94	10.09	NA	10.24	11.24
*Teacher Aide II	7.38	7.53	NA	7.68	8.68
Cook	9.94-12.42	NA	NA	NA	NA
Cook Aide I	9.94	NA	NA	NA	NA
*Cook Aide II	7.38	NA	NA	NA	NA
*Receptionist	8.39	NA	NA	NA	NA
*Maintenance	9.45	NA	NA	NA	NA
*Substitute Licensed Teacher	12.99-14.66	NA	NA	NA	NA
*Substitute	7.38	NA	NA	NA	NA

* Denotes Hourly

APPENDIX C

POLICY ON ELECTRONIC COMMUNICATIONS, E-MAIL & INTERNET USAGE

I. PURPOSE

Internet access to global electronic information resources on the World Wide Web is provided by Northeast Oklahoma Community Action Agency (NEOCAA) to assist employees in obtaining work-related data and technology. The following guidelines have been established to help ensure responsible and productive Internet usage. While Internet usage is intended for job-related activities, incidental and occasional brief personal use is permitted within reasonable limits.

The purpose of this policy is to protect the quality and integrity of NEOCAA's electronic communications and to provide employees with standards of behavior when using electronic communications. Each item in the policy is designed to strengthen the quality and integrity of this resource while minimizing risks to the agency's employees and the information systems.

NEOCAA is committed to preventing the occurrence of inappropriate, unethical, or unlawful behavior by any of the users of its computing systems and telecommunications networks. These responsibilities are not only mandated by the agency's business interests but by legal and ethical obligations concerning the welfare and privacy of its customers and partners. This Internet usage policy and its strict enforcement is an important and necessary part of the overall usage strategy.

Effective performance of computer and telecommunications networks, whether local or global, relies upon users adhering to established standards of proper conduct. This policy sets forth general principles to be applied to all employees who access the Internet and/or e-mail services by using NEOCAA computer equipment or via agency paid access methods.

II. SCOPE

The scope of this policy includes the following information:

- Internet services;
- Email Services
- Resource usage;
- Expectation of privacy;
- Corporate image;

The components outlined in this document focus on issues associated with NEOCAA's host computers, PCs, routers, terminal servers, and other devices that support access to the Internet. Furthermore, this Internet usage policy applies to all Internet users (individuals working for NEOCAA, including permanent full-time and part-time employees, contract workers, temporary agency workers, agency partners, and vendors) who access the Internet through the agency's computing or networking resources. NEOCAA's Internet users are expected to be familiar with and to comply with this policy, and are also required to use their common sense and exercise their good judgment while using Internet services.

III. POLICY

NEOCAA is committed to the utilization of new technologies and provides a variety of electronic tools including, but not limited to: telephones, (including wireless), voice mail, computers, facsimile machines, pagers, electronic mail (e-mail) systems, Internet access and a browser for employees whose job performance would be enhanced by the technology. NEOCAA's electronic communications tools are agency property paid for by public and agency funds and are primarily intended for business-related purposes.

While Internet usage is intended for job-related activities, incidental and occasional personal use is permitted within reasonable limits in accordance with the conditions outlined in this policy. When determining whether an employee's use of the Internet is appropriate, one may ask: "If I were doing this same activity in some other way (e.g. telephone, library, in person, by hand), would this activity be considered inappropriate?"

All Internet data that is composed, transmitted, or received via our computer communications systems is considered to be part of the official records of NEOCAA and, as such, is subject to disclosure to law enforcement or other third parties. Consequently, employees should always ensure that the business information contained in Internet e-mail messages and other transmissions is accurate, appropriate, ethical, and lawful. Data that is composed, transmitted, accessed, or received via the Internet must not contain content that could be considered discriminatory, offensive, obscene, threatening, harassing, intimidating, or disruptive to any employee or other person. Examples of unacceptable content may include, but are not limited to: sexual comments or images, racial slurs, gender-specific comments, or any other comments or images that could reasonably be expected to offend someone on the basis of race, age, sex, religious or political beliefs, national origin, disability, sexual orientation, or any other characteristic protected by law.

The equipment, services, and technology provided to access the Internet remain at all times the property of NEOCAA. As such, NEOCAA reserves the right to monitor Internet traffic, and retrieve and read any data composed, sent, or received through our online connections and stored in our computer systems.

Abuse of the Internet access provided by NEOCAA in violation of law or agency policies will result in disciplinary action, up to and including termination of employment. Employees may also be held personally liable for any violations of this policy. The following behaviors are examples of previously stated or additional actions and activities that are prohibited and can result in disciplinary action:

- * Sending or posting discriminatory, harassing, or threatening messages or images
- * Using the organization's time and resources for personal gain
- * Stealing, using, or disclosing someone else's code or password without authorization
- * Sending or posting messages or material that could damage the organization's image or reputation
- * Participating in the viewing or exchange of pornography or obscene materials
- * Sending or posting messages that defame or slander other individuals
- * Sending or posting chain letters, solicitations, or advertisements not related to business purposes or activities
- * Using the Internet for political causes or activities, religious activities, or any sort of gambling
- * Sending anonymous e-mail messages
- * Engaging in any other illegal activities

With regards to Internet and e-mail transactions conducted using NEOCAA's equipment and Internet access, the employee has no expectation to privacy and NEOCAA has the right to monitor. Employees understand and agree that: (a) NEOCAA maintains the right, for any reason or no reason at all, and with or without notice to the employee, to access or monitor all documents, messages or information created on, with or transmitted over the Systems, including employee E-mail and Internet usage. All such documents, messages or information can, and likely will, be reviewed by others; (b) employees have no expectation of privacy of any kind related to their use of the Systems or any documents, messages or information created on, with or transmitted over the Systems; (c) employees expressly waive any right of privacy or similar right in the documents, messages or information created on, with or transmitted over the Systems.

IV. INTERNET POLICY PROVISIONS

- A. It is NEOCAA's intent to limit personal computer use and Internet access to official business. Employees are authorized to utilize personal computers and access the Internet for personal use only on an incidental and occasional basis during working hours and after regular hours, in strict compliance with the other terms of this policy. Use of the Internet access system is a privilege that may be revoked at any time, with or without reason, with or without notice.
- B. Users must abide by copyright, contract or other local, state, or federal laws, and NEOCAA policies.
- C. Use of Internet resources for commercial use is prohibited.
- D. Internet accounts shall be accessed only by the authorized owners of those accounts. Confidentiality of passwords and user accounts must be protected. Individual users can be held accountable for use of their account by others.
- E. Intentional use of Internet resources to access, transmit or retrieve any material or communications that are obscene, pornographic or sexually explicit; of a discriminatory or harassing nature or which are derogatory to any individual or group; or are threatening in nature is prohibited.
- F. Intentional use of the Internet to access, transmit or download files that are knowingly dangerous to the integrity of the network is prohibited.
- G. No employee may use NEOCAA's Internet system to deliberately propagate any virus, worm, Trojan horse, trap-door, or back-door program code or knowingly disable or overload any computer system, network, or to circumvent any system intended to protect the privacy or security of another user.
- H. No employee may install, remove, or otherwise modify any hardware or software for the purpose of bypassing, avoiding, or defeating any filtering, monitoring, or other security measures the agency may have in place.
- I. NEOCAA reserves the right, in its discretion, to monitor Internet usage patterns to the extent necessary to ensure that the system is being used in compliance with this policy and other local, state or federal laws. (e.g. site accessed, on-line length, times of day accessed).

V. EMAIL POLICY PROVISIONS

- A. No computer system is completely secure. The e-mail system is not intended to transmit sensitive materials such as personnel decisions, legal opinions, confidential client information and other similar information that may be more appropriately communicated by written memorandum or personal conversation. All users of e-mail should be aware that confidentiality of electronic mail cannot be assured and that any communications which need to remain confidential should not be sent over e-mail systems. People tend to speak freely through e-mail because they falsely assume their messages are private and will be read only by the person receiving it. Even when an e-mail message is erased, it is still retained for a period of time. There are now firms in existence that specialize in finding incriminating or sensitive information in computer systems, including files deleted months or years prior, that still reside inside backup tapes, diskettes or hard drives.
- B. Employees may not intentionally intercept, eavesdrop, record, read, alter, or receive other person's e-mail messages without proper authorization in accordance with this policy.
- C. This policy applies to all employees, contractors, volunteers, and other individuals who are provided access to the NEOCAA e-mail system for agency business purposes.
- D. All messages on the NEOCAA's e-mail systems are agency property and are subject to the requirements and restrictions of all applicable State and Federal Statutes and regulations concerning the collection, creation, storage, maintenance, dissemination, and access to data created and/or maintained by the agency. NEOCAA reserves the right, in its discretion, to review any employee's electronic work product and messages and resource usage to the extent necessary to ensure that the system is being used in compliance with this policy and any other local, state or federal law.
- E. E-mail communications should be routinely and regularly deleted from their in-box, sent items box and trash bins.
- F. Employees using NEOCAA's personal computers and e-mail link are acting as representatives of the agency and inappropriate e-mail messages can give rise to claims of discrimination, harassment, defamation, and copyright infringement. As such, employees must act accordingly so as not to damage the reputation of the agency by creating, viewing, storing, transmitting, sending, or intentionally receiving communications, files or documents that are or could be interpreted as being intimidating, harassing, unlawful, or containing hostile, degrading, sexually explicit, discriminating, pornographic, or otherwise offensive references.
- G. Employees should endeavor to make each of their electronic communications truthful and accurate. Employees should use the same care in drafting E-mail and other electronic documents as they would for any other written communications. Please keep in mind that anything created, received, forwarded or stored on the Systems may, and likely will, be reviewed by others and that even deleted files may be recovered.
- H. No employee may use NEOCAA Internet access to post a message to an Internet message board, chat room, "weblog," "listserv," or other Internet communication facility, except in the

conduct of official business or furtherance of the agency's mission. The message must clearly identify the author as an agency employee, by name, with the employee's official agency e-mail return address or other contact information. Furthermore, all official e-mail communication between agency employees will be submitted using the agency's intranet email processes. No communication between employees or with individuals outside the agency will be conducted using alternative e-mail addresses, chat groups or instant messaging, such as "Yahoo".

- I. Use of NEOCAA's e-mail system for one's own business endeavors is prohibited. Solicitation of funds for non-agency sponsored functions, funds and political messages are prohibited. E-mail is a public record like any other public document.
- J. NEOCAA may review any message sent from or received into the agency's e-mail system for any purpose not specifically prohibited by law.
- K. The contents of e-mail sent by, between and/or to individuals covered by this policy may be disclosed within or outside the agency without the permission of the individual at any time deemed necessary by the agency and for any purpose not specifically prohibited by law.

Any violations to this policy on acceptable electronic communications systems use may subject an employee to disciplinary action, up and to and including discharge from employment.

APPENDIX D

CONFIDENTIALITY, SECURITY, AND ACCESS TO PROTECTED PERSONAL INFORMATION (PPI)

PURPOSE:

Protected personal information exists in many forms: written, verbal, or stored in paper, photographic, video, or electronic format. In all these media, protected personal information may be used for a variety of legitimate purposes, for example, determination and documentation of eligibility for client services, employment, quality review, education, research, legal, and reimbursement. Regardless of its use, clients must be assured the information they share with NEOCAA employees will remain confidential. Without such assurance, clients may withhold critical information that could affect the provision of appropriate services, as well as the reliability of the information, and NEOCAA may face legal consequences.

The Privacy Act of 1974 mandates that client information systems must protect the confidentiality of individually identifiable data. Section 5 U.S.C. 552a (e) (10) of the Act is very clear; client data systems must: "...establish appropriate administrative, technical, and physical safeguards to insure the security and confidentiality of records and to protect against any anticipated threats or hazards to their security or integrity which could result in substantial harm, embarrassment, inconvenience, or unfairness to any individual on whom information is maintained." One of NEOCAA primary responsibilities is to assure the security of the Privacy Act-protected and other sensitive information it collects, produces, and disseminates in the course of conducting its operations. NEOCAA views this responsibility as a covenant with its clients and personnel.

The growth and the easy access the Internet affords in the sharing of information has significantly enhanced the opportunity to use advanced information technology for both the public and private sectors. It provides unprecedented opportunities for interaction and data sharing. However, the advantages provided by the Internet come with a significantly greater element of risk to the confidentiality and integrity of information. The very nature of the Internet communication mechanisms means that security risks cannot be totally eliminated. However, NEOCAA is also aware that there is a growing demand for use of the Internet for inexpensive transmission of Privacy Act-protected and other sensitive information. NEOCAA has a responsibility to accommodate this desire as long as it can be assured that proper steps are being taken to maintain an acceptable level of security for the information involved.

POLICY:

In keeping with the values of NEOCAA, we respect and will protect every client's right to have all the information they share with agency employees to be kept confidential and we respect and will protect every employee's right to have all the protected personal information they share with the agency to be kept confidential.

SCOPE:

This policy applies to all NEOCAA employees, consultants, contractors, partners, volunteers, and Board members (hereafter referred to as Individuals). It presents guidelines that can be used to determine what protected personal information is, what a violation of privacy is, and the disciplinary process for anyone who violates privacy.

DEFINITIONS:

1. **Designated Record Set** - Any information that is used in whole or part by or for NEOCAA to make decisions about a client or employee.
2. **Protected Personal Information (PPI)** –Personal information that is identifiable to a specific individual and that is maintained or transmitted by a covered entity in any form, whether in oral, paper, or electronic form. Information is considered to be individually identifiable if it directly identifies the individual or there is a reasonable basis to believe that the information can be used to identify the individual. This policy applies to both client protected personal information and employee protected information.
3. **Ownership of Protected Personal Information within a Designated Data Set** – NEOCAA essentially “owns” its client files, personnel files and databases. However, this ownership “right” is not absolute. NEOCAA owns the files and databases, but the client/employee has a high level of access and control over distribution of their protected personal information contained within the files and databases. Protected personal information, regardless of the media in which it is maintained, paper or electronic, is the property of NEOCAA, but the protected personal information contained in the records belongs to the client/employee. Clients and employees have a right to access, inspect and receive a copy of their client/personnel files. NEOCAA is free to exert control over the physical document or records, but the information within the client/personnel file belongs to the client or employee. Nevertheless, to the degree that it is a business record, the provider’s database is owned by the provider. Both the ownership and access concept will be respected by NEOCAA.
4. **Need-to-Know** is defined as the right of an employee to access client or employee information only when it is necessary to perform his/her job responsibilities.

ORIENTATION/EDUCATION OF EMPLOYEES:

1. Information and education regarding the Confidentiality Policy shall be given to new employees upon General Orientation and annually for all other employees.
2. An employee who needs clarification of the Confidentiality Policy should speak with his or her supervisor.
3. NEOCAA will provide ongoing training for its employees, consultants, Board of Directors, as well as its providers, regarding the importance of protecting privacy.

CONFIDENTIALITY AND SECURITY OF PPI:

1. Employees may access PPI information **only** when it is necessary to perform their job.
2. Care needs to be taken to ensure that oral communication among NEOCAA employees occurs in an area and manner that ensures client privacy. Gossip, careless remarks, and idle chatter regarding protected personal information obtained under “1” above are violations of trust and the client’s or employee’s right to privacy.
3. Protected personal information must be disclosed only upon written authorization by the client or his/her legal representative or where such disclosure is authorized by federal or state law, subpoena, or court order, and in accordance with the Release of Information Policy.
4. Contractual arrangements will be made for release of information to any organization associated with NEOCAA and will include a confidentiality clause.
5. It is permissible to use the Internet for transmission of protected personal information, as

long as acceptable methods of encryption are utilized to provide for the confidentiality and integrity of the data and that authentication or identification procedures are employed to assure that both the sender and the recipient of the data are known to each other and are authorized to receive and decrypt such information. Audit trails, masking, passwords, encryption technology, data storage, and other policies at the technical level will be used to further protect client privacy.

6. Personnel policies at NEOCAA will include affirmative confidentiality requirements and applicable sanctions for breaches of confidentiality.
7. New employees of NEOCAA will sign a statement of confidentiality before receiving passwords to secured systems. Current employees will sign confidentiality statements upon receipt of this policy.
8. NEOCAA will maintain an audit trail of who accesses what information and of any unauthorized access attempts.
9. NEOCAA will only use client data collected for the purpose for which that data was authorized to be collected.
10. Any information passed to agencies for statistical computations will not contain any confidential client record information.
11. Client and/or employee identifying information must **not** be put or displayed in areas within view of the public. Logs, computer screens, printers, medical records, and client reports must be treated as confidential and kept away from public view.

ACCESS TO PPI:

1. Legal original client or personnel files shall not be removed from the NEOCAA facilities.
2. Copies that are made or printed from the electronic record that are not the original file copies should be disposed of properly for shredding. Information containing confidential client or employee information should **not** be discarded in waste paper baskets.

MANAGEMENT OF INFORMATION SYSTEMS:

1. Computer systems at NEOCAA will have a defined set of users. Users will receive policies and procedures regarding the protection and disclosure of confidential information.
2. Passwords will be changed periodically. Terminated employees will have their password authorizations terminated immediately.
3. All computers containing protected personal information will automatically enter into a password-protected mode after a set period of inactivity.
4. Each computer user will be assigned a security level specifically based on his/her job description.
5. All electronic media (tapes, floppies, discs, so forth) produced at NEOCAA with PPI will be catalogued and secured.
6. Long-term record management policies and procedures will be developed for archiving, purging, destroying, sealing, or changing of records and reports.
7. NEOCAA will establish a structure for internal monitoring and auditing to ensure that privacy, confidentiality, and security policies and procedures are followed.
8. NEOCAA disaster recovery plan will be followed to assure record integrity.
9. Anti-virus computer software will be installed on all internal computer systems.

VIOLATIONS:

1. Individuals observing others violating client or employee privacy in or outside of

- NEOCAA are obligated to report the incident to their supervisor.
2. Supervisors and/or appropriate personnel will investigate all alleged violations of the Confidentiality Policy.
 3. Individuals found in violation of this policy are subject to disciplinary action, up to and including immediate termination.

APPENDIX E

NORTHEAST OKLAHOMA COMMUNITY ACTION AGENCY, INC. WHISTLEBLOWER PROTECTION POLICY

It is the policy of Northeast Oklahoma Community Action Agency, Inc (NEOCAA) to encourage its employees and applicants for NEOCAA employment to disclose improper agency activities, based in part on Oklahoma Statutes Title 74, Section 840-2.5 and Title 5 USC, Part II, Chapter 12, Subchapter III Section 1211, and to address written complaints that allege acts or attempted acts of interference, reprisal, retaliation, threats, coercion or intimidation against employees or applicants who disclose improper agency activities. NEOCAA management has the responsibility to seek out and correct any and all abuses resulting from improper agency activities, and to protect those who come forward to report improper agency activities.

To assure the reporting of any activity that threatens the efficient administration of NEOCAA, reports that disclose improper agency activities shall be kept confidential. Reports shall be submitted to the Executive Director for investigation, except in cases where the report of improper agency activities is against the Executive Director.

An employee whose conduct may be the subject of the complaint of retaliation, reprisal, interference, threats, coercion or intimidation shall be given all due process rights in any disciplinary action that may result, pursuant to existing and applicable NEOCAA personnel policies and procedures.

This policy is hereby adopted and shall be known as the "Northeast Oklahoma Community Action Agency Whistleblower Protection Policy."

I. DEFINITIONS

A. Definitions Used in this Whistleblower Policy

To assist in the understanding of this policy, the following terms shall be defined as follows:

1. "Any person" includes all employees and all applicants for NEOCAA employment.
2. "Board" means the Northeast Oklahoma Community Action Agency Board of Directors.
3. "Complaint" means the written complaint alleging actual or attempted acts of reprisal, retaliation, threats, coercion, intimidation, interference, or similar improper acts that is submitted under penalty of perjury.
4. "Disciplinary action" means any direct form of discipline as defined in personnel policies and procedures adopted by NEOCAA. "Disciplinary action" shall include the firing of an employee.
5. "Improper agency activity" is defined as any activity by NEOCAA, or by an employee, that is undertaken in the performance of the employee's official duties, whether or not such action is

within the scope of his or her employment or by an individual or company conducting or performing work for the NEOCAA and which is:

- a. In violation of any State or Federal law or regulation, including, but not limited to, corruption, malfeasance, bribery, theft of NEOCAA property, fraudulent claims, fraud, coercion, conversion, malicious prosecution, discrimination, misuse of NEOCAA property and facilities, or willful omission to perform duty, or
- b. In violation of any NEOCAA policy, procedure, rule or regulation established by the Board, or
- c. Is economically wasteful or involves gross misconduct, incompetence, or inefficiency, or
- d. Is a substantial and specific danger to public health or safety.

6. "Protected disclosure" means a good faith communication that discloses or demonstrates an intention to disclose information that may evidence either of the following:

- a. An improper agency activity.
- b. Any condition that may significantly threaten the health or safety of employees or the public if the disclosure or intention to disclose was made for the purpose of remedying that condition. A disclosure made in connection with an employee's assigned normal duties is not protected.

7. "Report" means an oral or written protected disclosure of information as defined above.

8. "Use of official authority or influence" includes promising to confer, or conferring, any benefit; effecting, or threatening to effect, or taking, or directing others to take, or recommending, processing, or approving, any personnel action, including, but not limited to, appointment, promotion, transfer, performance evaluation, suspension, or other disciplinary action.

B. Relation to Oklahoma Statute Title 74, Section 840-2.5 and Title 5 USC, Part II, Chapter 12, Subchapter III Section 1211.

If there is any conflict between the provisions of this policy, including definitions, or those used in Oklahoma Statute Title 74, Section 840-2.5 and Title 5 USC, Part II, Chapter 12, Subchapter III Section 1211, the statutory provisions shall control.

II. REPORTING IMPROPER AGENCY ACTIVITIES

A. Reporting Improper Agency Activities

Any person may report information alleging improper agency activity under procedures established under NEOCAA personnel policies and procedures.

B. Where to Report Improper Agency Activities

Reports that disclose information concerning improper agency activities shall be submitted as follows:

1. Employees shall provide information to their immediate supervisor or the information shall be provided directly to the Executive Director;
2. Applicants for NEOCAA employment shall submit information directly to the Executive Director;
3. If the Executive Director is the subject of the information, the information shall be submitted directly to the President of the Board.

C. Procedure for Investigating Reports of Improper Agency Activities

Reports alleging improper agency activity will be investigated, if warranted, and reported according to procedures established in NEOCAA personnel policies and procedures.

III. PROTECTION FROM ACTUAL OR ATTEMPTED ACTS OF INTERFERENCE, INTIMIDATION, REPRISAL, RETALIATION, THREATS AND COERCION FOR REPORTING IMPROPER AGENCY ACTIVITIES

A. Reprisal, Retaliation, Threats, Coercion, Intimidation or Interference with the Right to Report Information of Improper Agency Activities Prohibited

An NEOCAA employee may not directly or indirectly use or attempt to use the official authority or influence of his or her position or office to interfere with the right of a person to provide information as described in Section II.A, or intentionally engage in acts of reprisal, retaliation, threats, coercion or similar acts against a person as a result of his or her providing, or attempting to provide, such information or refusing to obey an illegal order.

B. Filing a Written Complaint

1. When information, as described in Section II.A has been provided under the procedures of Section II.B and the complainant becomes the subject of acts of actual or attempted reprisal, retaliation, interference, intimidation, coercion or threats, a complaint shall be filed directly with an immediate supervisor, except as provided in III.B.2 (b), below. The supervisor shall be responsible for submitting the complaint to the Executive Director with a memorandum from the supervisor.
2. When information, as described in Section II.A has been provided under the procedures of Section II.B. and the complainant becomes the subject of actual or attempted interference or retaliation, reprisal, intimidation, coercion or threats, a complaint shall be filed directly with the Executive Director under the following conditions:
 - a. The person is an applicant for employment; or

b. The employee does not wish to file the complaint with an immediate supervisor because the disclosure of improper agency activity or complaint of reprisal action involves allegations against the supervisor.

3. Any complaint filed with the Executive Director must be filed within 12 months of the alleged act or threat of interference or retaliation.

4. In order for a complaint of actual or attempted acts of interference, intimidation, reprisal, retaliation, threats or coercion to be accepted directly by the Board of Directors, the complainant must have previously provided information, as described in Section II.A pursuant to the procedures in Section II.B., with the immediate supervisor or the Executive Director, except in cases where the complaint is against the Executive Director.

5. An exception shall be made where the complainant presents a preponderance of evidence that the complainant was prevented from providing information by intimidation or interference. A preponderance of evidence means that it is more likely than not that the intimidation or interference has occurred. The Board will determine if the evidence is sufficient in its discretion.

6. A complaint of actual or attempted acts of interference, reprisal, retaliation, intimidation, coercion, threats or similar improper acts may also be filed with a local law enforcement agency.

C. Investigation of Complaints by the Executive Director

1. The Executive Director shall determine issues of timeliness and where warranted, investigate complaints from any person alleging actual or attempted acts of reprisal, interference, intimidation, retaliation, threats, coercion or similar acts.

2. When a complaint is filed with the Executive Director, the Executive Director's investigation and findings shall be limited to the interference, reprisal or retaliation aspect of the complaint only.

3. Before final findings are made, the Executive Director will provide a copy of the complaint and any documents upon which the Executive Director intends to rely in reaching findings to the person accused of interference, intimidation, reprisal, retaliation, threats, or coercion. That person will be provided the opportunity to respond to the complaint and to file a written statement, which will become part of the record.

4. If the report alleges that the Executive Director interfered or took the retaliatory action, the Executive Director shall not investigate the report. The file shall be provided directly to the President of the Board who shall investigate the matter or designate someone to investigate the retaliation.

D. Executive Director's Decision

1. The Executive Director shall reach a decision regarding the complaint and shall communicate that decision to the complainant and to the person or persons accused of violating Section III.A of this Policy. The Executive Director's decision will include any appropriate relief for the complainant but will not describe any disciplinary action that may be taken against the accused party or parties.
2. If the complaint alleges that the Executive Director interfered or took the retaliatory action, the complaint of retaliation shall be presented to the President of the Board, who will take the administrative actions described for the Executive Director.

E. Discipline of an NEOCAA Employee

Subject to existing and applicable NEOCAA personnel policies and procedures, the Executive Director will determine the appropriate disciplinary action, if any, to be initiated against an NEOCAA employee found to have taken reprisal actions, interfered or retaliated, as defined in Section III.A.

F. Appeal of the Decision

Decisions of the Executive Director may be appealed to the Board of Directors pursuant to existing applicable NEOCAA personnel policies and procedures.

APPENDIX F

2010-2011 Holiday Schedule (All full time employees EXCEPT Early Head Start)

Independence Day	July 5
Labor Day	September 6
Thanksgiving Holiday	November 24, 25, 26
Christmas Holiday	December 23, 24, 27
New Year's Day	December 31
Martin Luther King	January 17
President's Day	February 21
Good Friday	April 22
Memorial Day	May 30

2010-2011 Holiday Schedule (for Early Head Start staff only)

Independence Day	July 5
Labor Day	September 6
Thanksgiving Holiday	November 24, 25, 26
Christmas Holiday	December 23, 24, 27
New Year's Day	December 31
Memorial Day	May 30

APPENDIX G
NORTHEAST OKLAHOMA COMMUNITY ACTION AGENCY
EMPLOYEE CONFLICT OF INTEREST POLICY

Purpose: The conflict of interest policy is designed to ensure that no employee receives a financial interest or personal benefit from grant funds unless allowed by the funding source. The Oklahoma Department of Commerce as a general guideline indicates that “no persons who have exercised any functions or responsibilities with respect to activities assisted by ODOC funds may obtain a financial interest in or benefit from an ODOC activity or have an interest in any contract, subcontract or agreement, either for themselves or for those with whom they have family or business ties, during their tenure or for one year thereafter.” Each funding agency varies in its application of the concept of a conflict of interest but in all cases the goal is the same: Employees, board members, and contractors are not to receive financial benefit from a proposed contract or receive benefit in terms of service from the agency unless specifically allowed by the funding agency. Rules of allowable activities and services and the process to gain approval vary among programs and each must be carried out in accordance with the funder’s requirements.

This policy covers all Northeast Oklahoma Community Action Agency (NEOCAA) employees. NEOCAA prohibits employees from engaging in any activity, practice, or act which conflicts with the interests of the agency, its clients, or its funding agencies. Employees have an obligation to conduct business within guidelines that prohibit actual or potential conflicts of interest.

This policy is included in the NEOCAA Personnel Policies to ensure that all employees understand their responsibilities in carrying out the conflict of interest policy.

Employment. The following rules shall be observed with respect to persons whose employment is supported by Federal funds, State funds, and/or by contribution to the non-federal share.

- A. No person shall hold a job over which an immediate family member exercises immediate supervisory authority.
- B. For purposes of this policy, immediate family member is defined as follows:

Spouse	Mother-in-law, father-in-law
Children	Brother-in-law, sister-in-law
Grandchildren	Daughter-in-law, son-in-law
Parents	Adopted family members
Grandparents	Step-family members
Brother/Sister	

Agency Contracts/Purchasing. Agency staff must follow specific guidelines for purchasing and contracting as described below.

Disclosures. Employees must disclose any financial interest they or their immediate family have in any firm or individual that does business or is seeking to be considered to do business with NEOCAA.

Employees of NEOCAA are required to disclose information concerning relationships and transactions between and among staff, with NEOCAA Board members, with family members of staff, and with entities with which the staff is associated (“Related Party Transactions”).

Staff should make these disclosures when a transaction involves any of the parties listed in the preceding paragraph when they are seeking to do business with NEOCAA. Information to be disclosed includes the following:

- (A) Does the staff member have a family or business relationship with a NEOCAA Board member or other staff member?
- (B) Are any staff members, either personally, through family members, or through entities with which they are associated, involved in, or do they intend to become involved in, any transaction or relationship with NEOCAA, its subsidiaries or delegate agencies?

Required disclosure in contracts. Employees must disclose any financial interest he/she or a relative has in any firm which does business with NEOCAA. NEOCAA may require any employee to divest him/herself of any interest deemed to be in conflict with the agency’s best interests. No NEOCAA employee shall participate in the selection, award, or administration of a contract if a real or apparent conflict of interest would be involved. Such a conflict could arise when the employee has a relationship with any party listed below who is involved in a proposed contract with the agency:

1. any member of the employee’s family;
2. his or her business partner;
3. an organization which employs or is about to employ any of the above parties; or
4. any related party who has a direct or indirect financial or other interest in the firm, organization or individual selected for an award.

Gifts to staff. Employees of NEOCAA are prohibited from soliciting or accepting gifts, money, or gratuities, other than those of nominal value, from:

- Persons receiving benefits or services under any NEOCAA program;
- Any person or organization performing services for or providing goods to NEOCAA; or
- Persons or organizations that are otherwise in a position to benefit from the actions of NEOCAA staff.

“Nominal value” is defined to be \$10.

Employee Program Assistance. NEOCAA employees and members of their families may only apply for assistance from programs that the Executive Director has opened to employees in accordance with the following guidelines:

- (a) Employees and their families must meet all the criteria of eligibility for these programs and will be considered for eligibility according to the guidelines of the program for which they are wishing to apply.
- (b) NEOCAA employees must not take applications on themselves. An employee of the program who normally takes applications will assist and take the employee’s application.

(c) The procedures for approval of applications for employees will be made to funding agencies as required by the funding agency.

(d) The Executive Director or his/her designee(s) can provide information regarding programs that are open to employees and their families. A description of the requirements of each program is attached and will be updated as it changes.

Continued disclosure obligation. If, after signing this policy, a staff member becomes involved in, or intends to become involved in, or becomes aware of an existing Related-Party Transaction, any activity or transaction prohibited by this Policy, or any other actual or apparent conflict of interest, the staff member shall promptly notify NEOCAA's Executive Director.

Procedure for addressing Related Party Transactions and conflicts of interest. Related party transactions involve financial transactions that include relationships among staff, board members, and staff/Board family members and other related business entities. Related party transactions may be allowable if not providing undue benefit to the related parties. Although a related party transaction may not involve a conflict of interest, the related party transaction must be reported to management. The following procedures will be followed:

- (a) Except as set forth in (c) below, NEOCAA's Executive Director shall address all Related Party Transactions and actual and potential conflicts of interest involving a staff member by referring the related party transaction to the agency's attorney.
- (b) The agency's attorney will determine if the related party transaction involves a conflict of interest. The attorney will also determine if the related party transaction, even if a conflict of interest, is in the best interest of the agency and its mission. The attorney will advise the agency if the proposed transaction is allowable under state law.
- (c) If the Related Party Transaction or conflict of interest is not prohibited, then the Executive Director and/or his/her designee(s) shall present the proposed transaction to the Board of Directors for a decision.
- (d) The Executive Director shall submit Board-approved transactions to the funding sources as required by the funders for their consideration.
- (e) The Executive Director and members of the Board of Directors shall make disclosure to the Chairperson of the Board of Directors of any involvement in a Related Party Transactions, and/or actual or potential conflicts of interest to the Chairperson of the NEOCAA Board of Directors. The Chairperson shall follow the same procedures that the Executive Director or his/her designee(s) follow when a staff member discloses his or her involvement in a Related Party Transaction and/or actual or potential conflict of interest.

By signing here, I acknowledge that I have read and agree to abide by this policy and (check one):

_____ am not, to the best of my knowledge, a participant in any Related Party Transaction, actual or potential conflict of interest, contract described in paragraph 3, provision of professional services, gift, or any other transaction required to be disclosed by this policy, including but not limited to the disclosures required by paragraphs 2, 3, 4 and 5, above.;
or

_____ have disclosed below, to the best of my knowledge, any Related Party Transactions, actual or potential conflict of interest, contract described in paragraph 3, provision of professional services, gift, or any other transaction required to be disclosed by this policy, including but not limited to the disclosures required by paragraphs 2, 3, 4 and 5, above.

Disclosure: _____

Printed Name

Signature

Date

ATTACHMENT 1
Eligibility of Employees and Relatives for Agency Services

Each funder of the agency's programs has separate requirements for the implementation of conflict of interest policies as they relate to the eligibility for services of employees and their family members. The description below itemizes the programs of the agency and the guidelines to be followed for eligibility for services for employees and their relatives.

Services Provided with Funds from the Oklahoma Department of Commerce (ODOC) as Exceptions to the Conflict of Interest Policy for ODOC. The Conflict of Interest Policy of ODOC indicates that employees and their relatives are not eligible for services from ODOC-funded programs. Exceptions may be considered by ODOC if the following process is followed:

1. Disclosure of the conflict, including public disclosure to the Board of Directors;
2. Opinion of the agency's attorney that the interest for which the exception is sought would not violate State or local law;
3. Determination that the individual is a member of a group or class of low-income persons intended to be the beneficiaries of the assisted activity who will receive the same treatment as other low-income persons, that the employee has removed him/herself from the eligibility determination process, and other items described in the ODOC policy;
4. Board of Directors' approval to seek an exception from ODOC;
5. Determination by ODOC that an exception will be granted.

A similar process must be followed for approval of services offered through the Oklahoma Housing Finance Agency for all its programs. In the case of the Oklahoma Housing Finance Agency, there are additional requirements that must be met.

General Guidelines for the Agency's Programs:

Rent/Utility Assistance. These programs will not be available to employees and their family members because the length of time required for exception approval from ODOC would not make it possible to grant the assistance in a timely fashion.

Housing Programs. Employees and their relatives are not eligible for housing programs except through the exception process outlined above. This process must be followed for housing rehabilitation, down payment assistance, and home ownership activities (either as seller or buyer).

Weatherization. Employees and their relatives are not eligible for weatherization except through the exception process outlined above. Their selection for service, if an exception is granted by ODOC, follows the weatherization priority ranking system.

RX for Oklahoma. Employees and their relatives are eligible for this service and must meet the eligibility criteria of the pharmaceutical company. In general, employees will not be eligible for these services because they have prescription insurance.

Tax Assistance. Employees and their relatives are eligible for this service and must only meet the IRS requirements for income limits (currently \$50,000).

Head Start. Employees and their relatives are eligible for this service. Their selection for service follows the Head Start priority ranking system.

Work Programs/Financial Literacy/Homebuyer Education. These services are available to all employees and their relatives.

APPENDIX H

NORTHEAST OKLAHOMA COMMUNITY ACTION AGENCY FRAUD PREVENTION POLICY

Introduction

NEOCAA's Fraud Policy is established to facilitate the development and enforcement of controls which will aid in the prevention and detection of fraud or theft against the agency. This policy applies to any fraud or theft or suspected fraud or theft involving an employee (including management), a consultant, vendor, contractor, outside agency, or person doing business with the agency or in any other relationship with the agency.

NEOCAA does not tolerate any type of fraud or theft. The agency's policy is to promote consistent, legal, and ethical organizational behavior by:

- assigning responsibility for reporting fraud or theft;
- providing guidelines to conduct investigations of suspected fraudulent behavior;

Failure to comply with this policy subjects an employee (including management) to disciplinary action, including immediate termination. Failure to comply by a consultant, vendor, contractor, outside agency, or person doing business with the agency or in any other relationship with the agency could result in cancellation of the business or other relationship between the entity and the agency.

NEOCAA will pursue prosecution if the results of an investigation indicate the possibility of criminal activity.

Definitions and Examples of Fraud and Waste

Fraud is defined as an intentional deception designed to obtain a benefit or advantage or to cause some benefit that is due to be denied. Examples of fraud include:

- Forgery or alteration of any financial document or account belonging to the agency;
- Forgery or alteration of a check, bank draft, or any other financial document;
- Theft of a check or other diversion of a payment;
- Misappropriation of funds, securities, supplies, or other assets;
- Impropriety in the handling or reporting of money or financial transactions;
- Accepting or seeking anything of material value from contractors, vendors or person providing services/materials to the agency;
- Destruction, removal or inappropriate use of records, furniture, fixtures, and/or equipment (including computer equipment and internet access);
- Disclosing confidential and proprietary information to outside parties;
- Misuse of company resources for personal use;

- Abuse of paid time for non-work related activities.
- **Theft** is defined as the act of taking something from someone unlawfully. An example of theft is taking home equipment or supplies belonging to the agency and keeping them for personal use.

Responsibility to Report Suspected Fraud

Each employee is required to report any suspected fraud or theft in writing to the Program Director or Executive Director.

The identity of an employee or complainant who reports suspected fraud will be protected to the full extent allowed by law in accordance with the agency's Whistleblower Policy.

Suspected improprieties and/or misconduct concerning an employee's ethical conduct should be reported to agency management. Note that there are many instances of prohibited actions that do not rise to the level of fraud, such as an improper relationship with a vendor.

Guidelines for Handling a Report of Suspected Fraud or Theft

When an initial report is made to management the reporting individual should receive the following instructions and information:

- Do not contact the suspected individual in an effort to determine facts or demand restitution.
- Allow NEOCAA management to conduct the investigation. Do not further investigate the allegations.
- Observe strict confidentiality. Do not discuss the case, facts, suspicions, or allegations with anyone unless specifically asked to do so by agency management.
- Retaliation will not be tolerated. The agency will not tolerate any form of retaliation against individuals providing information concerning fraud or suspected fraud.
- Every effort will be made to protect the rights and the reputations of everyone involved, including the individual who in good faith alleges perceived misconduct as well as the alleged violator(s).
- The identity of an employee or other individual who reports a suspected act of fraud will be protected as provided by the agency's Whistleblower policy.

Responsibility of Management

On receiving a report of suspected fraud, agency management shall document the contact and conduct a preliminary investigation to determine the credibility of the report. If the report is credible, agency management shall follow the investigation guidelines provided in this policy.

Agency management shall make every effort to protect the rights and the reputations of everyone involved in a report of suspected fraud, including the individual who in good faith alleges perceived misconduct, as well as the alleged violator(s). Management staff also shall make every effort to protect the identity of a person who in good faith reported the suspected fraud.

However, disciplinary action may be taken as provided by this policy if a report is made in bad faith.

On determining that a report is not credible or is not a report of fraud, management staff shall document this determination. Documentation shall include support for the determination.

Management staff is responsible for reporting confirmed fraud to the appropriate state, local and federal authorities in the manner required by state/federal law.

Management staff is responsible for the administration, revision, interpretation, and application of this policy.

Guidelines for the Investigation of Suspected Fraud

Management staff is responsible for the full investigation and documentation of suspected fraud.

Management staff has primary responsibility for the investigation of reported wrongdoing and all suspected fraud. Each employee involved in an investigation of suspected fraud shall keep the content of the investigation strictly confidential to the full extent provided by law. Investigation results shall not be disclosed or discussed with anyone other than those who have a legitimate need to know.

Any required investigative activity shall be conducted without regard to the suspected wrongdoer's length of service, position/title, relationship to the agency, or any other perceived mitigating circumstance.

Management staff shall maintain appropriate documentation regarding incidents of fraud.

If an investigation substantiates fraudulent activities, Management staff will prepare an incident report as soon as possible after the fraud is confirmed and shall document the content of the investigation, the findings, and any disciplinary action taken as a result of the finding.

Any inquiries from the suspected individual, his or her attorney/representative, or any other inquirer shall be directed to Management staff. If necessary, Management staff will refer these inquiries as deemed appropriate.

Disciplinary Action

Failure to comply with any part of this policy is grounds for disciplinary action, including immediate termination.

An employee who:

- has engaged in any form of fraud or theft;
- suspects or discovers fraudulent activity and fails to report his or her suspicions as required by this policy; or
- intentionally reports false or misleading information

is subject to disciplinary action, including termination.

I have received a copy of NEOCAA's Fraud Policy and agree to abide by all of the conditions and stipulations contained in the policy.

Printed Name of Employee

Employee Signature

Date