



Therapeutic Interventions, Inc.  
**EMPLOYEE POLICY MANUAL**

Revised July 2021

## **Latest Revisions**

COVID-19 Policy (July 2021)

FFCRA Policy removed (July 2021)

Time Off Policy, Annual Leave (December 2020)



Therapeutic Interventions, Inc.  
Employee Policy Manual  
**Table of Contents**

<b>1. INTRODUCTION</b>	<b>5</b>
ABOUT THIS MANUAL	5
WELCOME FROM THE CEOS	5
<b>2. OVERVIEW</b>	<b>6</b>
ABOUT THE ORGANIZATION	6
EEO STATEMENT	6
CORPORATE COMPLIANCE	7
<b>3. EMPLOYMENT</b>	<b>9</b>
EMPLOYMENT-AT-WILL	10
HIRING PROCEDURES	11
INDEPENDENT CONTRACTORS	16
ONBOARDING AND ORIENTATION	21
TERMINATION OF EMPLOYMENT	22
<b>4. WORKPLACE CONDUCT</b>	<b>25</b>
CODE OF RIGHTS, RESPONSIBILITIES, AND CONDUCT	26
CONFIDENTIALITY & NONDISCLOSURE	44
HIPAA STATEMENT OF COMPLIANCE	46
CONFLICT OF INTEREST	50
DRUG & ALCOHOL POLICY	55
NON-SOLICITATION POLICY	57
SAFETY AND SECURITY	59
INFORMATION SYSTEMS AND COMMUNICATIONS	61
<b>5. TIME AND ATTENDANCE</b>	<b>64</b>
WORK SCHEDULES	65



ATTENDANCE POLICY.....	66
TIME OFF.....	69
LEAVE ADMINISTRATION.....	73
<b>6. COMPENSATION .....</b>	<b>79</b>
PAY POLICIES.....	80
DIRECT DEPOSIT.....	87
PROFIT SHARING AND STAFF BONUSES.....	88
<b>7. BENEFITS .....</b>	<b>90</b>
ELIGIBILITY.....	91
WORKERS' COMPENSATION.....	93
<b>8. PERFORMANCE MANAGEMENT.....</b>	<b>94</b>
DISCIPLINARY ACTION .....	95
PERFORMANCE EVALUATIONS .....	98
BACKGROUND CHECKS.....	102
<b>9. GENERAL.....</b>	<b>108</b>
AUTHORIZATION FOR USE OF PERSONAL VEHICLE .....	109
AGENCY PROPERTY.....	111
TELECOMMUTING POLICY.....	112
COVID-19 POLICY.....	113
PERSONAL APPEARANCE .....	115
VERIFICATION OF EMPLOYMENT.....	116
<b>10. ACKNOWLEDGEMENT OF RECEIPT AND REVIEW.....</b>	<b>117</b>



## 1. INTRODUCTION

### ABOUT THIS MANUAL

This employee policy manual is intended to inform you of the terms and conditions of your employment, including Agency policies and procedures. This policy manual is not an employment contract or legal document, nor does it represent an express or implied guarantee of employment, and therefore should not be interpreted as such. The policy manual is considered a living document and Therapeutic Interventions (TI) reserves the right to revise, add, or delete from this policy manual as it determines is appropriate. When changes are made to the policies and guidelines contained herein, we will endeavor to communicate them in a timely manner, typically in a written supplement to the policy manual, distributed electronically or during staff meetings. Employees are expected to comply with the most current policy versions. Questions concerning this policy manual should first be directed to your supervisor for clarification.

### A WELCOME FROM THE OWNERS

Welcome!

You have just joined a dedicated team of employees and managers. We hope that your employment with the Agency will be rewarding and challenging. We take pride in our employees as well as the services we provide. We consider ourselves leaders in the field of foster care and adoption.

Please take the time now to read this employee policy manual carefully. Sign the acknowledgment at the end to show that you have read, understood, and agree to the contents of this policy manual, which sets out the basic rules and guidelines concerning your employment.

Please understand that no employee policy manual can address every situation in the workplace. If you ever have questions about your employment, you are encouraged to ask them. If you have any difficulty reading or understanding any of the provisions of this policy manual, please contact your direct supervisor, Human Resources, or Executive Director. Likewise, if you have any suggestions related to Agency policies or procedures, please let us know.

We wish you success in your employment here at Therapeutic Interventions!

All the best,

Dr. Richard Call & Michael Hullett



## **2. OVERVIEW**

### **2.1 ABOUT THE ORGANIZATION**

Therapeutic Interventions, Inc. (TI) is a licensed child-placing agency with offices across the state of Tennessee. Since it was founded in 1997, TI has helped families and children through foster care, case management and adoption services.

#### **MISSION STATEMENT & VISION**

##### ***Mission Statement***

Nurturing Children & Families

##### ***Vision***

We look forward to living in a world where all parents instill in their children a sense of being valued and feeling secure, where families are emotionally stable and caring, and all communities are safe and supportive.

#### **ORGANIZATION**

TI maintains a corporate office in Nashville, Tennessee, with operations in the East, Middle and West regions of the state. The Agency is led by the Executive Director, Lois Barrett Luke. The Agency's governing board of directors includes founder and co-CEO, Michael Hullett, and co-CEO Dr. Richard Call. Each regional office is managed by the Regional Director, with all administrative and program staff being directly supervised by the Regional Director.

#### **AGENCY FACILITIES**

Corporate Office/Middle Regional Office  
1101 Kermit Drive, Suite 201, Nashville, TN 37217  
(615) 457-2334 Phone; (615) 457-2336 Fax

East Regional Office  
25 West Broad Street, Suite 8, Cookeville, TN 38501  
(931) 526-2244; (866) 877-7515 Fax

### **2.2 EQUAL EMPLOYMENT OPPORTUNITY (EEO) STATEMENT**

TI is committed to maintaining an open and inclusive culture and a work environment free from unlawful discrimination. We identify as an Open and Affirming (O&A) agency and an Equal Opportunity Employer. All qualified applicants will receive consideration for employment without regard to race, color, religion, sex, sexual orientation, gender identity, national origin, age, protected veteran status, status as an individual with disability, or other class protected by law.



## 2.3 CORPORATE COMPLIANCE WITH FALSE CLAIMS ACT

Therapeutic Interventions shall maintain corporate compliance with all applicable laws, standards, and policies in order to protect taxpayer funds that are received by Therapeutic Interventions in any direct or indirect contract. Compliance shall be monitored by both internal and external audit processes to document that required services are delivered and each contractual obligation is met.

The Corporate Compliance Officer designated at Therapeutic Interventions is Michael Hullett, Board President. Any questions or concerns should be directed to the Corporate Compliance Officer at Therapeutic Interventions' Corporate Office in Nashville.

### *Compliance with the False Claims Act*

Therapeutic Interventions receives partial funding from the TennCare (Medicaid) program and must comply with the Deficit Reduction Act of 2005, Section 6032. All contractors that provide all levels of foster care, Continuum Services, Level 3 and Level 4 services receive funding and are required to comply with this provision, which is also specified in the Provider Agreement and Master Subcontract.

The Deficit Reduction Act of 2005, section 6032 requires that as a TennCare (Medicaid) provider, Therapeutic Interventions is required to have a specific policy regarding the False Claims Act and must educate all employees regarding this policy. This includes new employees, as well as all employees on an annual basis. All Therapeutic Interventions agency employees are encouraged to report suspected or known fraud and fiscal abuse. Personnel may report TennCare enrollee fraud and fiscal abuse to the State of Tennessee Office of Inspector General, TennCare Fraud Division toll-free hotline at 1-800-433-3982.

Employees may report TennCare (Medicaid) provider fraud and fiscal abuse to the Tennessee Bureau of Investigation, Medicaid Fraud Control Unit at 1-800-433-5454.

Under the Deficit Reduction Act of 2005, section 6032, Whistleblowers are protected by federal law. No retaliation of any nature is tolerated for the reporting of fraud and abuse to this agency or the Tennessee Office of Inspector General or TBI Medicaid Fraud Control Unit.

Fiscal abuse includes practices that are inconsistent with sound fiscal, business, or medical practices, and result in an unnecessary cost to the Medicaid (TennCare) program, or in reimbursement of services that are not medically necessary or that fail to meet professionally recognized standards for health care. It also includes recipient practices that result in unnecessary costs to the Medicaid/TennCare/Cover TN Program. For DCS contract agencies, failure to provide services that are required in the scope of the per diem constitutes provider fiscal abuse. Accessing services from a community TennCare provider, when such services are to be covered in the scope of the services for which a provider has contracted, also constitute provider fiscal abuse.

Examples of cases that the Office of Inspector General investigates include unreported income or insurance, TennCare/Cover TN recipients living out of state, drug seeking



behavior, incarceration, individuals receiving bills (or EOB statements) for services never provided, provider billing irregularities, over or under utilization of health care services, and misrepresentation of credentials. Provider fraud involves not only doctors, but nursing homes, home health, durable medical equipment, pharmacies, mental health facilities, laboratories, transportation and dentists, to name a few.





### 3. EMPLOYMENT

EMPLOYMENT-AT-WILL.....	10
HIRING PROCEDURES .....	11
INDEPENDENT CONTRACTORS .....	16
ONBOARDING AND ORIENTATION.....	21
TERMINATION OF EMPLOYMENT .....	22



POLICY #: HR9001	TOPIC: <b>Employment-At-Will</b>	DATE:
COA CORE/PRACTICE STANDARD(S):		APPROVED BY:

**POLICY:**

Employment at Therapeutic Interventions is at-will. The Agency has the right to terminate employment at any time, with or without just cause, as permissible by law. Likewise, employment with TI is mutually consented and can be terminated by the employee at any time, for any and no reason.

**PROCEDURE:**

The above policy will not be amended for any employee, for any reason. It is the intent of TI for this policy to be understood and implemented by all staff.



POLICY #: HR9007	TOPIC: <b>Hiring Procedures</b>	DATE:
COA CORE/PRACTICE STANDARD(S):		APPROVED BY: Board of Directors

**POLICY:**

The Agency is committed to attracting, engaging, and retaining a qualified, high performing, and diverse workforce. All searches and internal movements, including promotions and lateral movements, are conducted in compliance with federal, state, and local laws. To achieve our talent acquisition and talent management objectives, we implement the following strategies:

1. Identify a vacancy, clearly define credentials, job expectations, core competencies, essential functions, and responsibilities, and summarize in a job description.
2. Strategically source and fill positions with the best qualified applicants, based on job-related factors, including work experience, applicable education, knowledge, skills, and abilities.
3. Provide opportunities to internal qualified applicants for movement within the agency.
4. Continually support a diverse workforce and extend equal opportunities for underrepresented groups.
5. Review and revise job descriptions regularly to ensure relevancy and accuracy, in consideration of workforce needs, service population, and government regulations.
6. Ensure job descriptions and selection criteria demonstrate consideration of culturally and socioeconomically diverse candidates by including references to accommodations (religious, linguistic, ability, and mobility), and general flexibility in recruitment practices, to make opportunities more accessible.

**PROCEDURE:**

*Overview*

All recruitment efforts are coordinated by the hiring manager in compliance with the procedures outlined below. The hiring manager has the flexibility to partner with Human Resources for service offerings, including workforce planning, talent pool assessment, strategic sourcing, and successful selection.

Posting Requirements

1. All new and vacant benefits-eligible staff positions will be posted.
2. Promotional opportunities require a competitive process and posting must occur when there are similarly situated employees. (see Internal Applicants below).
3. In rare circumstances, a hiring manager can request a posting exception, or non-competitive promotion. A justification rationale for a non-competitive promotion must be submitted to the Executive Director. The final decision will be communicated to Human Resources. The request and outcome documentation will be included in the employee’s personnel file.



4. After the hiring manager identifies a vacancy or new position, and the essential job functions and roles of the position have been documented as required, the hiring manager will collaborate with Human Resources and other key stakeholders, in developing and documenting objective, nondiscriminatory criteria (requisite qualifications and skills) for the position. All criteria must be relevant to the position. Qualifications referencing mental and physical demands must be bona fide occupational qualifications.

## Advertising

### External

1. Job postings and other notifications of a vacancy or new position will reflect the same qualifications and job requirements as listed in the job description. Job vacancies may only be posted on external platforms and websites which are preapproved by the Executive Director.
2. All external job postings must include reference to the Agency's commitment to equal employment opportunities (EEO) using exactly the following language:

***Therapeutic Interventions is an Equal Opportunity Employer. All qualified applicants will receive consideration for employment without regard to race, color, religion, sex, sexual orientation, gender identity, national origin, age, protected veteran status or status as an individual with disability.***

### Internal

1. Human Resources will notify all current employees of each Job vacancy at the time of posting, in conjunction with opening the recruitment process to external sources.

## Internal Applicants

The Agency encourages the consideration of current employees for vacant positions (e.g.: promotions and lateral movement).

1. If a position becomes vacant for which a present employee would qualify and would like to be given consideration, the following procedure may be followed:
  - a. The employee may request in writing to be considered for the position.
  - b. The written request will go to the immediate supervisor for consideration.
  - c. The immediate supervisor will forward the request to Human Resources for documentation.
2. Hiring managers are encouraged to allow employees to take reasonable time off for interviews.



3. Pursuit of an internal job opportunity should not jeopardize an employee's present position.
4. After accepting a position for a promotion or lateral move, an employee is responsible for giving sufficient notice of at least two (2) weeks to their former supervisor.
5. Upon beginning a new position within the Agency, resulting from a promotion or lateral move, a current employee will retain accrued but unused paid time off, unless otherwise noted in the time off policy.

### Review of Applicants

1. To be considered for a position, a job seeker must complete the online application process.
2. The hiring manager may begin to consider an applicant immediately upon receipt of all application materials. Resumes and any supporting documents should be reviewed based on job-related qualifications including, but not limited to:
  - a. Required and preferred education
  - b. Experience
  - c. Knowledge, skills, and abilities as identified in the job description.
  - d. References
3. If there are no qualified applicants for a position, the following can take place:
  - a. Reposting: To increase the number of qualified applicants, the hiring manager and/or Human Resources has the flexibility to modify qualifications. In these cases, the position must be re-posted for at least seven calendar days, and all applicants for the re-posted position must be considered.
  - b. Placing on hold/Pausing: A job posting for a vacancy can be placed on hold, or paused, while the Agency re-evaluates its recruitment strategy.

The Agency will not close and then reopen job postings, regardless of passage of time, to avoid any impact on the applicant pool. For the same reason, we will not update the job title, job profile, or revise the language in a job posting once it has been posted.

### Interviews and Testing of Applicants

The applicant interview is a critical step in the recruitment process. It is the hiring manager's opportunity to review applicant qualifications and to determine applicant suitability for the position. It also provides applicants with the chance to learn about the position and its requirements, to learn about the Agency, and to present information on their skills and experience.



1. The hiring manager and Human Resources must ensure consistent administration of the interview process. Consistent administration includes equal treatment of applicants and uniform interview content. The Agency has a standard interview questionnaire that addresses the applicant's qualifications and ability to meet the requirements of the position. Interviewers should avoid asking any questions outside of the standard interview questionnaire that are discriminatory or unrelated to the position, in compliance with employment and labor laws.
2. Candidates for a position may be administered an assessment for job-related competencies, using a properly validated test or other selection procedure. Assessments will be identified before the interview process begins, if appropriate. Job-related assessments will be facilitated by Human Resources, the hiring manager, and/or a computer-based testing system. Use of a job-related assessment will be disclosed to applicants prior to administering.
3. When used, approved tests and selection procedures will be given to candidates under equivalent conditions, will be scored, evaluated, and used as a selection factor equally for candidates, and will be maintained with other application and selection materials.
4. A candidate who is in the final stages of the recruitment process should be offered the opportunity to communicate with currently employed personnel. Participation is voluntary, and personnel shall not be discriminated or retaliated against for participation or non-participation in a candidate interview. Reasonable accommodations should be made for all participating parties.
5. Any candidate who refuses to participate in an assessment will be eliminated from further consideration. Upon request by an applicant with a disability, the hiring manager and/or Human Resources will provide reasonable accommodations during the interview and testing processes, subject to approval by the Executive Director.

### Offers of Employment

1. An applicant may not be extended an offer or start in a position until a proper candidate search has been conducted.
2. Human Resources will verify if a candidate is eligible for employment (e.g.: whether or not the candidate is deemed ineligible for rehire if previously employed by the Agency) before an offer is extended.
3. All positions, permanent and temporary, require a conditional offer letter to be provided to the Candidate. This document will be generated and distributed by Human Resources after confirming salary and any applicable provisions with the hiring manager.



An official offer letter will be provided upon successful completion of a background check (excludes minors) and submission of supplemental documents, which include:

- Conditional Offer Letter
  - DCS Authorization for Release of Information
  - TI Release of Information
  - Background Check Authorization Form
  - Fingerprint Card Information Sheet
  - Job Description (signed)
  - TI Medical Evaluation Form [as mandated by The Department of Children's Services (DCS)]
  - Valid Driver's License
  - Social Security Card
  - Proof of Personal Auto Insurance (w/ \$100,000 liability coverage)
  - Proof of Vehicle Registration
  - Copy of Official School Transcripts
  - Training Documentation
  - Licensure Documentation
  - Three professional references (including most recent employer)
4. The Hiring Manager or Human Resources will notify an unsuccessful candidate who was interviewed by updating the application status online and by sending a letter or calling the applicant. The status of all other applications will be updated to accurately reflect non-selection reason and will be done in a timely manner throughout the recruitment process, to properly manage the applicant experience.



POLICY #: HR9004	TOPIC: <b>Independent Contractors</b>	DATE: 12/01/2020
COA CORE/PRACTICE STANDARD(S): HR 7.01, HR 7.03, HR 7.05, HR 7.06		APPROVED BY:

**POLICY:**

The Agency will occasionally utilize external resources in the form of independent contractors to carry out special projects and services. An independent contractor will perform work and/or provide service(s) on behalf of the Agency yet is considered a non-employee and is not a replacement for currently employed personnel of the Agency. The scope of work and/or service(s) provided is outlined in a written contract between the independent contractor and the Agency established prior to any work and/or service(s) performed. Independent contractors are vetted and contracted by the Agency in compliance with federal, state, and local laws.

Prior to contracting with the Agency, an independent contractor must:

1. Classify as an independent contractor, using evaluation methods approved by the Internal Revenue Service (IRS).
2. Demonstrate skills, competencies, and qualifications necessary to perform the work;
3. Pass a criminal background check, along with any additional checks related to the scope of work;
4. Provide professional references and undergo a reference check;
5. Complete an IRS W-9 and a direct deposit form;
6. Review and sign a confidentiality agreement, along with the Agency’s conflict of interest and other relevant policies.

When a contract is established, it is the Agency’s responsibility to:

1. maintain a record of the signed written agreement and related documents;
2. routinely monitor and document contractor progress toward fulfilling the terms of the contract; and
3. review contractor performance against identified deliverables prior to contract renewal.

**PROCEDURE:**

*Overview*

The Agency outsources special projects and services to independent contractors as needed and for a specific period of time. The process for contracting with an independent contractor includes the following:

- A. Define scope-of-work and qualifications, and determine if independent contractor status is appropriate;
- B. Recruit and advertise need for independent contractor;
- C. Conduct background and reference checks; verify qualifications, credentials, and skills where applicable;





- D. Draft a written agreement and obtain a signed copy;
- E. Obtain signed acknowledgement of Agency policy, including conflict of interest and confidentiality;
- F. Monitor and review performance;
- G. Maintain accurate records for each independent contractor.

The procedures outlined below further detail the Agency's process for contracting with independent contractors. All efforts are coordinated by the hiring manager in compliance with the procedures outlined below. The hiring manager has the flexibility to partner with Human Resources for service offerings, including recruitment, determining independent contractor status, contract negotiations, legal consultation and document drafting.

#### A. Defining Scope-of-Work and Qualifications

This step in the contracting process will be the basis for the written agreement between the Agency and the independent contractor.

##### 1. **Scope-of-Work**

The hiring manager will outline and document the scope of work, identifying the desired result, timelines, and services needed.

##### 2. **Qualifications**

The hiring manager will identify the skills, competencies, and qualifications required for the services needed.

##### 3. **Independent Contractor versus Employee**

The hiring manager will determine if an independent contractor status is appropriate by using the following methods:

- a. **Internal assessment:** Requires using the IRS 20-Factor Test and documenting the results for recordkeeping.
- b. **External Assessment:** Requires completing an IRS Form SS-8, Determination of Worker Status for Purposes of Federal Employment Taxes and Income Tax Withholding. The IRS will make a determination upon receipt of a completed SS-8 form and communicate the result to the designated Agency contact.

#### B. Recruitment and Advertising

The hiring manager may use several sources to identify independent contractors for special projects and services, including, but not limited to, written and verbal (word-of-mouth) referrals, advertisements, job boards, professional events, and reference checks.

#### **Conflict of Interest**

Written and verbal referrals are subject to the Agency's *Conflict of Interest* policy, especially where the referral is made by a person who is currently employed by or under contract with the Agency.



Current employees and contractors who are found to be in violation of the *Conflict of Interest* policy will be subject to corrective action procedures as dictated by that specific policy.

While the independent contractor is expected to adhere to the terms of the *Conflict of Interest* policy, the terms of the written agreement for services will also include language on how the Agency will handle a violation of the *Conflict of Interest* policy.

### C. Background and Reference Checks

An independent contractor under consideration by the Agency, who has direct contact with children and youth and who may or may not work with sensitive or confidential information, is subject to a background screening in compliance with DCS policy.

Please refer to the *Background Check Policy* for more information.

#### 1. **Background Checks**

- a. The background check for contractors is completed before a contract has been finalized. A valid background check report will be conducted prior to assignment and will include:
  1. Criminal records check from local law enforcement records or county court records for all residences of employee within the immediate six (6) months preceding contract negotiations.
  2. The background check will also include reference checks, employment verification, professional license and certification verification, review of social media accounts, and other job-relevant information, such as a credit history check (see Credit History Check below), at the discretion of the Agency and in accordance with the Fair Credit Reporting Act.
- b. An independent contractor must complete an authorization to conduct a background check. In addition to completing a background check authorization, a signed release of information will be required to conduct a background screening.
- c. Candidates must provide addresses, including international addresses if applicable, for the previous seven years to ensure the appropriate criminal history checks are completed. Any candidate who refuses to certify this information will be eliminated from further consideration.
- d. A background check must be completed, and a satisfactory report received, before a contractor may start an assignment.
- e. If a contractor was previously on assignment with the Agency within the last 30 days, and a background check was completed within the past twelve months, the results from the previous background check will be considered valid and can be used to confirm eligibility for hire.

#### 2. **Reference Checks**

- a. The Hiring Manager and/or Human Resources will conduct



reference checks by contacting at least two (2) professional references. Reference checks will be completed before a contract has been finalized.

- b. Hiring managers will utilize interviewing strategies to ensure compliance with EEO and state law.
- c. Information provided by references and gathered during the reference check must be retained, along with other contract materials.

### **3. Verifying Qualifications, Skills, and Credentials**

Prior to entering into a contract, the organization verifies in writing that each contractor:

- a. possesses the necessary qualifications;
- b. is licensed and/or has certification, where applicable;
- c. has relevant experience including experience delivering services to the service population, if providing direct services; and
- d. carries professional liability insurance (only where required by law or by generally accepted business/industry practices).

#### **D. Written Agreement**

The written agreement is intended to clearly define the relationship between the Agency and the independent contractor. It establishes the rules of engagement and acts as the fundamental governing document between the two parties. Therefore, a written agreement must include detailed and specific language on the following:

- a. Length of project with specified end date;
- b. Detailed summary of scope-of-work, expectations, deliverables (including reports) with specific timeframes and milestones;
- c. specify competencies, including necessary qualifications and trainings, and any necessary equipment;
- d. describe protocols for routine communication of relevant information and data, including confidential information;
- e. include requirements for maintaining client records, documentation of services, and organization access to client records;
- f. describe expectations for contractor involvement in the organization's quality improvement process; and under what circumstances the contract can be terminated, including termination and notice provisions;
- g. Schedule and method of payments for work performed. Hiring manager will confirm the method of payment with Agency accountant before contract is finalized.



## E. Monitoring and Reviewing Performance

The hiring manager will routinely monitor and document contractor progress toward fulfilling the terms of the contract.

Independent contractors are non-employees and are not subject to the standard employee performance evaluation. Therefore, expectations, deliverables, and timelines must be included and clearly defined in the contract/written agreement. The hiring manager will review contractor performance and measure progress against identified deliverables prior to contract renewal.

### **Terminating a Contract/Written Agreement**

The Agency cannot terminate an independent contractor so long as the results produced meets the specifications of the contract, unless the written agreement includes specific language around notice and termination provisions, which explain how, when, and under what circumstances the contract can be legally terminated. Any provisions included in the contract will be strictly followed.

A contract which has expired does not require a formal termination process, however, it is the hiring manager's responsibility to notify the Human Resources and Accounting departments when a contract has expired.

## F. Recordkeeping

The Agency will maintain a record for each independent contractor that contains:

1. identifying and contact information;
2. application, resume, and documentation of qualifications;
3. IRS Form SS-8 or an internal assessment that the individual was properly classified as an independent contractor per Internal Revenue Service guidelines;
4. documentation of reference checks;
5. a background check;
6. a copy of the contract/written agreement
7. a signed statement that the contractor will adhere to the organization's conflict of interest policies;
8. a signed confidentiality agreement;
9. a completed IRS W-9 form;
10. direct deposit information; and
11. documentation of quality monitoring of contractor performance.

The Human Resources department will be responsible for maintaining accurate, compliant, and up-to-date personnel files. Paper and electronic personnel records are to be stored in a secure location and kept strictly confidential. Records will be kept for the duration of the contractor's time with the Agency, unless otherwise mandated by law.



POLICY #: HR9048	TOPIC: <b>Onboarding and Orientation</b>	DATE:
COA CORE/PRACTICE STANDARD(S):		APPROVED BY:

**POLICY:**

Each benefits-eligible new hire will receive a proper onboarding and comprehensive orientation at commencement of employment to facilitate a successful transition into the Agency.

**PROCEDURE:**

1. Onboarding

On or before the first day of employment, the new hire will complete and submit new hire forms and supporting documentation in Paylocity. Examples of onboarding documents include the I-9 and supporting documentation, Federal W-4, W-9 (for reimbursements), direct deposit information, emergency contact information, and benefit enrollments.

By law, the Agency is required to verify the identity and work eligibility of new hires, including employees with non-resident, immigrant, and asylum status. As a result, new hires are required to provide physical evidence of I-9 supporting documentation within three (3) days of the start date. Failure to do so can result in immediate termination of employment.

2. Orientation

On or before the first day of employment, the new hire will meet with Human Resources for a review of the Agency’s mission, values, history, business model, key policies, and other important information. The new hire will have the opportunity to address any initial questions and resource needs during this meeting.

Systems access and issuance of company property will occur during the orientation process and will be coordinated by Human Resources, the corporate office administrator, and the direct supervisor.

*Training*

Therapeutic Interventions is committed to providing each new hire with the training required to excel in their new role. The extent of training will depend on the job description, job classification, evidence of prior experience and certifications, and other related factors. For example, program staff are required to undergo a minimum of 160 hours of comprehensive training prior to the assignment of any cases. For more information on this, employees can refer to the Training Content and Effectiveness Policy along with the TI Training Matrix. In most cases, new hire training will include a combination of online training, observation, hands-on application, video, audio, or reading materials, and will be coordinated by the direct supervisor.



POLICY #: HR9054	TOPIC: <b>Termination of Employment</b>	DATE:
COA CORE/PRACTICE STANDARD(S):		APPROVED BY:

**POLICY:**

This policy outlines the rules governing the termination of TI employees. This policy applies to all employees, including those with part-time and temporary status. As an at-will employer, employees may terminate employment at any time. Likewise, the Agency has the right to terminate an employee at any time, with or without just cause and as permissible by law.

When an employee separates from the Agency for any reason, the supervisor has the responsibility to promptly communicate the separation to Human Resources and other appropriate departments to facilitate implementation of this policy.

**PROCEDURE:**

Notice of Intent to Separate

Employees who resign from the Agency are responsible for providing appropriate notice of their resignation. An employee who fails to provide proper notice may have their remaining accrued annual leave balance withheld from payout and may be deemed ineligible for rehire. This policy applies to resignations and retirements.

1. Notice Period

- a. Hourly employees – a minimum two (2) weeks working notice is appropriate, during which period use of benefit time will not routinely be approved.
- b. Salaried employees – a minimum four (4) weeks working notice is appropriate, during which period use of benefit time will not routinely be approved.

2. Communication Method

- a. Written, email, or verbal resignations are considered appropriate methods for communication.
- b. The notice, at a minimum, must clearly establish the full name and separation date of the resigning employee and must be communicated to the direct supervisor.
- c. If the resignation notice is verbally communicated to the supervisor, the supervisor will confirm the acceptance of the resignation in writing.

3. Exceptions

- a. TI has the right to accept a resignation immediately, whereby the resigning employee is expected to return Agency property and leave the premises immediately.
- b. Supervisors have the discretion (with preapproval of Executive Director) to pay the a separating employee through some or all the notice period, in lieu of requiring the working notice.



## Rescinding a Notice

On the rare occasion an employee requests to rescind a resignation, this must be communicated, in writing, to the supervisor. Upon receipt, the supervisor will consult with the Human Resources Director and Executive Director to discuss options and the requesting employee will receive written notice of the decision within one (1) business day.

## Termination of Employment

This policy applies to resignations, terminations, and retirements of TI employees.

### 1. *Involuntary Termination*

Where an employee's employment status is being reviewed, for disciplinary or non-disciplinary reasons permissible by law, facts and circumstances of a given case and governing policy will determine what employment action is taken, up to and including termination of employment. Decisions to terminate employment should be communicated to the Executive Director and Human Resources.

The following are considered involuntary terminations:

- a. Misconduct, Violation of Agency Policy, or Gross Misconduct<sup>1</sup>
- b. Layoff (with or without severance)
- c. Unsatisfactory Job Performance
- d. End of Temporary Assignment
- e. Death/Deceased<sup>2</sup>

### 2. *Voluntary Termination*

The following separation reasons are considered voluntary:

- a. Dissatisfied with Job
- b. Dissatisfied with Pay
- c. Dissatisfied with Management
- d. End of Temporary Assignment
- e. Family Obligation
- f. Left/Graduated from School
- g. To Attend School
- h. Retirement
- i. Relocation
- j. Disability Claim Rewarded<sup>3</sup>
- k. Commute
- l. Accepted Better Job Opportunity
- m. Resigned in lieu of Termination<sup>4</sup>

<sup>1</sup> Examples of behavior that constitute misconduct can be found in the Disciplinary Process Policy.

<sup>2</sup> See *Death of an Employee* below.

<sup>3</sup> See *Disability Eligibility* below.

<sup>4</sup> Ineligible for future employment with the Agency.



### 3. *Death of an Employee*

- a. Human Resources will immediately inform the benefits administrator upon first learning of the death of an employee.
- b. Survivors of the deceased employee must be directed to Human Resources, or the designated benefits contact, to complete the necessary documents for insurance claims and for release of a deceased employee's final paycheck.

### 4. *Disability Eligibility*

Employees who become eligible to receive Long Term Disability insurance will be provided a notice that their employment will be ending. Employees whose employment ends due to receiving Long Term Disability insurance will be eligible for rehire when released to return to work, if applicable. Eligibility for rehire does not guarantee or hold a position.

### Exiting Employees

An employee whose employment is terminated and who may present a potential risk to the business operations of Therapeutic Interventions will be directed to leave the office immediately.

Otherwise, when an employee separates from Therapeutic Interventions, the Human Resources Director is responsible for the following steps, to be completed on the last day of employment for voluntary separations and at the time of termination for involuntary separations:

1. Create and Submit Separation Documentation
  - a. Generate termination letter and disseminate to separating employee; includes information on final paycheck and COBRA.
  - b. Issue a Notice of Separation (if applicable).
  - c. Initiate the termination by submitting a Personnel Action Form (PAF) and related documentation;
2. Schedule exit interview (voluntary separations only). Participation is voluntary.
3. Disable Systems Access and voicemail
  - a. Contact IT Service Provider to coordinate removal of access to Agency systems and services.<sup>5</sup>
  - b. Contact vendors to remove signature authority (for supervisors/approvers).
  - c. Cancel or exchange memberships and/or subscriptions, as necessary.
4. Retrieve any Agency property, such as ID badge, access cards, credit cards, office keys, computer equipment, etc.

<sup>5</sup> Therapeutic Interventions systems and services are intended for business activity and must be protected against activity that does not represent the business interests of the Agency. Systems and services may include but are not limited to local area network dial-in network access, shared file space, e-mail and various clinical and departmental activities. If a business need exists, the Human Resources Director may coordinate with the IT service provider to set up an auto-response to notify sender how to direct their emails.





## 4. WORKPLACE CONDUCT

CODE OF RIGHTS, RESPONSIBILITIES, AND CONDUCT .....	26
Code of Ethics and Professional Conduct .....	26
Workplace Discrimination and Harassment Policy.....	29
Workplace Violence .....	33
Accommodations .....	35
Personnel Grievances .....	37
Personnel Records .....	40
Agency Social Events .....	43
CONFIDENTIALITY & NONDISCLOSURE .....	44
Third-Party Inquiries.....	45
HIPAA STATEMENT OF COMPLIANCE.....	46
CONFLICT OF INTEREST.....	50
General Policy.....	50
Gifts.....	51
Nepotism and Preferential Treatment.....	52
Fraternization.....	52
Moonlighting.....	52
DRUG & ALCOHOL POLICY.....	54
NON-SOLICITATION POLICY .....	56
SAFETY AND SECURITY.....	58
INFORMATION SYSTEMS AND COMMUNICATIONS.....	60
Voicemail, Email, and Internet Use.....	60
Social Media Use.....	62



POLICY #: HR9005	TOPIC: <b>Code of Ethics and Professional Conduct</b>	DATE:
COA CORE/PRACTICE STANDARD(S):		APPROVED BY:

**POLICY:**

The purpose of this policy is to:

1. establish expectations for ethical and professional conduct while employed or under contract with the Agency;
2. explain the consequences for misconduct;
3. outline the procedures for reporting suspected misconduct;
4. outline the procedures for self-disclosing misconduct; and
5. emphasize prohibition of employment-related retaliation for reporting misconduct and confidentiality of reported information.

The Agency will conduct its business honestly and ethically wherever operations are maintained. We strive to improve the quality of our services and operations and will maintain a reputation for transparency, fairness, respect, responsibility, integrity, trust, and sound business judgment.

In addition to these principles, all personnel must comply with policies, professional standards, and the letter and spirit of applicable laws and regulations.

**PROCEDURE:**

*Overview*

All personnel are expected to adhere to high standards of business, personal integrity, and professionalism as a representation of our business practices.

1. Workplace Environment

The Agency is committed to creating and maintaining a workplace environment which fosters mutual respect, integrity, and professional conduct. The Agency is also committed to providing a safe work environment in which discrimination, harassment, and acts or threats of violence are not tolerated. The Agency expects its personnel to treat each other, and those with whom they have business dealings on behalf of the Agency, with respect, honesty, integrity, consideration, and civility. Please refer to specific policies relating to equal employment, discrimination, hostile work environment, workplace violence, bullying, and sexual harassment for detailed guidance.

2. Conflicts of Interest

The Agency understands that personnel may have or be involved in outside financial, business, professional, academic, public service, or other activities. We expect that officers, directors, managers, and employees will not allow personal interests to conflict with the



interests of the Agency, its clients, or affiliates, nor will they misrepresent the Agency or use their Agency contacts to advance private or personal interest. Please refer to specific policies relating to conflict of interest for detailed guidance.

### 3. Confidentiality and Privacy

The Agency entrusts its personnel with the confidential information of the Agency, its clients, and at times, others. It is the responsibility of each personnel to protect this information and prevent misuse or unauthorized disclosure. The confidentiality of sensitive business information about the Agency or operations, or that of our clients or partners, is to be treated with discretion and only be disseminated on an authorized, need-to-know basis. Please refer to specific policies relating to privacy and confidentiality for detailed guidance.

### 4. Agency Records

All financial records, expense reimbursements, accounting, time and attendance records, data entry, and submissions to regulatory agencies must be truthful, timely, complete, and accurate. Please refer to specific policies relating to attendance and recordkeeping for detailed guidance.

### 5. Use of Agency Resources

Agency personnel are responsible for protecting and preventing the misuse of Agency resources, property, and other assets, including, but not limited to, funds, information, intellectual property, facilities, office supplies, equipment, computers, networks, software, telephone and internet services, voicemail, e-mail, and social media accounts. Agency resources are reserved for Agency business and may only be used for lawful and authorized purposes. Agency-issued computers and business e-mail may be used for reasonable and incidental personal use.

### 6. Personal Appearance and Professionalism

It is important and expected for all Agency personnel to present themselves in a professional manner. This includes reporting for work dressed and neatly groomed, maintaining personal hygiene habits that are generally accepted in the community, and displaying appropriate social behavior, especially while conducting business on behalf of the Agency or attending Agency events. Please refer to specific policies relating to personal appearance, drug and alcohol use, and Agency events for detailed guidance.

### 7. Violations

All personnel are responsible for adhering to these principles of ethical and professional conduct, including acting on and reporting violations. Violation of the Code of Ethics and Professional Conduct is considered misconduct, and can result in disciplinary action, up to and including termination of employment. The degree of discipline imposed may be influenced by the existence of voluntary disclosure of any ethical violation(s) and whether the violator cooperated in any subsequent investigation.



## 8. Reporting Responsibilities and Procedures

It is the responsibility of each personnel to promptly notify the Agency of any inappropriate behavior or misconduct, so that it can be properly addressed. Agency personnel who are aware of or suspect fraud, misappropriation of funds, theft, other misuse of Agency resources or assets, accounting irregularities, or other violation of these principles or Agency policy, should report their concerns immediately to their supervisor, Human Resources, or the Executive Director. Please refer to specific policies on harassment, conflict of interest, and grievance procedures for more detailed guidance.

All reports of misconduct received, actions taken, and resolutions reached will be documented, tracked and secured in a confidential manner.

## 9. Retaliation

The Agency strictly prohibits retaliation against any person for making a report in good faith, cooperating with an investigation, or reporting of suspected misconduct or questionable practices. Individuals who take retaliatory action will be subject to disciplinary action up to and including termination of employment.



POLICY #: HR9056	TOPIC: <b>Workplace Harassment and Discrimination</b>	DATE:
COA CORE/PRACTICE STANDARD(S):		APPROVED BY:

**POLICY:**

Therapeutic Interventions is committed to creating a work environment free from unlawful discrimination and harassment. The Agency enforces a strict policy against all forms of workplace harassment, including sexual harassment, based upon an individual’s sex, race, religion, color, national origin, physical or mental disability, marital status, age, sexual orientation, gender identity or expression, pregnancy, or any other status protected by federal, state or local laws or Department of Children’s Services (DCS) policy.

All forms of harassment of, or by, employees, contractors, visitors, resource families, birth families, and clients, and other stakeholders, are strictly prohibited and will not be tolerated. Interpersonal and electronic communications fall under the purview of this policy.

**GUIDELINES:**

Policy Against a Hostile Work Environment

A hostile work environment is created when the discriminatory actions and behaviors of a co-worker, supervisor, direct report, or other colleague makes performing job responsibilities impossible, and whereby the initial terms and reasonable expectations of a comfortable work environment have been significantly altered.

Discrimination occurs when an employee or prospective employee is subject to an adverse work environment based on a protected class or category of which the employee is a member.

Common behaviors that contribute to a hostile work environment include:

- a. Intimidation
- b. Unlawful expectations
- c. Singling out an employee for ridicule or insults based on a characteristic classified as protected by the EEOC and other civil right laws.
- d. Unlawful denial of advancement, pay, benefits or leave
- e. Verbal abuse and discrimination
- f. Physical confrontation
- g. Sexual harassment
- h. Written harassment via email or other social media
- i. Office or workplace bullying

*Bullying*

Bullying falls under the purview of creating a hostile work environment and is defined as a pattern of repeated behavior that a reasonable person would find hostile, offensive, and unrelated to legitimate business interests. A single physical, verbal or written act or behavior



can constitute bullying if especially severe and egregious. Bullying behavior may take forms including physical, verbal, or written acts of behaviors and often involves an abuse or misuse of power.

Common behaviors that constitute bullying include:

- a. public or private humiliation and mockery
- b. malicious gossip
- c. intentionally withholding information an employee requires to perform their job responsibilities; other deliberate exclusionary behaviors.
- d. excessive and unwarranted monitoring
- e. “Moving the goalpost”; changing or being vague about the criteria of a process or project while it is still underway, in such a way that the new goal offers one side an advantage or disadvantage.

Incidences of hostility and bullying should be reported to the supervisor immediately, especially where evidence of discrimination is present. Under no circumstances is an employee who feels they are being treated with hostility by a supervisor obligated to report their concerns to the supervisor. When the supervisor is the source of a complaint, the reporting employee should immediately notify Human Resources of their complaint.

### Policy Against Sexual Harassment

Sexual harassment is defined as unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when:

1. submission to such conduct is made either explicitly or implicitly as a term or condition of an individual’s employment (“quid pro quo”);
2. submission to, or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual or
3. such conduct has the purpose or effect of unreasonably interfering with an individual’s work performance or creating an intimidating, hostile or offensive work environment.

Common behaviors that qualify as sexual harassment include:

- a. unwelcome requests for sexual favors;
- b. lewd or derogatory comments or jokes;
- c. comments regarding sexual behavior or the body of another employee;
- d. sexual innuendo and other vocal activity such as catcalls or whistles;
- e. obscene letters, notes, emails, invitations, photographs, cartoons, articles, or other written or pictorial materials of a sexual nature;
- f. repeated requests for dates after being informed that interest is unwelcome;
- g. retaliating against an employee for refusing a sexual advance or reporting an incident of possible sexual harassment to TI or any government agency;
- h. offering or providing favors or employment benefits such as promotions, favorable evaluations, favorable assigned duties or shifts, etc., in exchange for sexual favors; and
- i. any unwanted physical touching or assaults, or blocking or impeding movements.



Sexual harassment falls under the purview of a hostile work environment, whereby sexual harassment is considered sex discrimination, and sex is considered a protected category or class.

Incidences of sexual harassment should be reported to the supervisor immediately, especially where evidence of discrimination is present. Under no circumstances is an employee who feels they are the subject of sexual harassment by a supervisor obligated to report their concerns to the supervisor. When the supervisor is the source of a complaint, the reporting employee should immediately notify Human Resources of their complaint.

### Other Workplace Harassment

Other workplace harassment is defined as verbal or physical conduct that insults or shows hostility or aversion towards an individual because of the individual's sex, race, religion, color, national origin, physical or mental disability, marital status, age, sexual orientation, gender identity or expression, or any other status protected by federal, state or local laws, and that:

1. contributes to or has the effect of creating an intimidating, hostile or offensive working environment;
2. unreasonably interferes with an individual's work performance; or
3. Otherwise adversely affects an individual's employment opportunities.

Common behaviors that may constitute workplace harassment include:

- a. the use of disparaging or abusive words or phrases, slurs, negative stereotyping, or threatening, intimidating or hostile acts that relate to the above protected categories;
- b. written or graphic material that insults, stereotypes or shows aversion or hostility towards an individual or group because of one of the above protected categories and that is placed on walls, bulletin boards, email, voicemail or elsewhere on the Agency's premises, or circulated in the workplace; and
- c. a display of symbols, slogans or items that are associated with hate or intolerance towards any select group.

Incidences of other workplace harassment should be reported to the supervisor immediately, especially where evidence of discrimination is present. Under no circumstances is an employee who feels they are the subject of other workplace harassment by a supervisor obligated to report their concerns to the supervisor. When the supervisor is the source of a complaint, the reporting employee should immediately notify Human Resources of their complaint.

### How Claims Will Be Handled

Discrimination and harassment will not be tolerated in the workplace, especially in retaliation toward reporters or witnesses of discrimination and harassment.

Any employee who feels that he or she has witnessed, or been subject to, any form of discrimination or harassment is required to immediately notify their supervisor, Human Resources, or the Executive Director, in writing.

Claims of workplace harassment and/or discrimination will be promptly and thoroughly investigated, and appropriate action will be taken where a claim has merit. Discipline for



violation of this policy may include, but is not limited to reprimand, suspension, demotion, transfer, and discharge. If the Agency determines that harassment or discrimination has occurred, corrective action will be taken to effectively end the harassment.

As necessary, the Agency may monitor any incident of harassment or discrimination to ensure the inappropriate behavior has ceased. In all cases, the Agency will follow up as necessary to ensure no retaliation occurs for making a complaint or cooperating with an investigation.





POLICY #: HR9037	TOPIC: <b>Workplace Violence</b>	DATE:
COA CORE/PRACTICE STANDARD(S):		APPROVED BY:

**POLICY:**

The safety and security of our employees, clients, families, professionals, and the general public is of essential importance. Therapeutic Interventions has a zero-tolerance policy for threats or acts of violence made by an employee against another person’s life, health, well-being, family, or property. Any act of intimidation, threat of violence, or act of violence committed against any person on Agency property is prohibited.

The following definitions apply in relation to this policy and are applicable wherever referenced throughout the Policy Manual.

1. Intimidation: A physical or verbal act toward another person, the result of which causes that person to reasonably fear for his or her safety or the safety of others.
2. Threat of violence: A physical or verbal act which threatens bodily harm to another person or damage to the property of another.
3. Act of violence: A physical act, whether or not it causes actual bodily harm to another person or damage to the property of another.

This policy includes intimidation, threats of violence, or actual violence enacted on social media or other virtual platforms.

**PROCEDURE:**

Agency employees are always expected to conduct themselves professionally, especially on Agency property, when performing work on behalf of the Agency, and when representing the Agency at events.

The following are prohibited:

1. Any act or threat of violence made by an employee against another person’s life, health, well-being, family, or property.
2. Any act or threat of violence, which endangers the safety of employees, residents, tenants, vendors, contractors, or the general public.
3. Any act or threat of violence made directly or indirectly by words, gestures, symbols, or email.
4. Use or possession of a weapon on the Agency’s premises managed by the Agency.  
No person shall possess or have control of any firearm, deadly weapon, or prohibited knife,



as legally defined, while on Agency property or conducting business on behalf of the Agency, except as required in the lawful course of business or as authorized by law.

5. Retaliation against any employee for reporting a violation of this policy. Any employee who engages in retaliation is in violation of this policy and will be subject to disciplinary action up to and including termination. An employee who believes they are the subject of retaliation should contact Human Resources immediately.

Any employee who feels they are the recipient of workplace violence or has identified a situation where workplace violence has or could occur must immediately bring it to the attention of the direct supervisor, Human Resources, or the Executive Director. Harassment of a sexual nature is governed by the Workplace Harassment and Discrimination Policy, which includes sexual harassment.

An employee who violates this policy, whether intentionally or unintentionally, may be subject to criminal charges, arrest, civil action, as well as disciplinary action up to and including immediate termination of employment.

#### Other Considerations

If an incident of violence occurs and results in an injury or death to an employee, the event must be recorded and reported to OSHA within 8 hours of the incident. The incident must also be immediately reported to the Workers' Compensation Administrator and the Benefits Administrator. An internal incident report must also be completed and submitted, whether or not an injury or death occurs.



POLICY #: HR9035	TOPIC: <b>Accommodations</b>	DATE:
COA CORE/PRACTICE STANDARD(S):		APPROVED BY:

**POLICY:**

Therapeutic Interventions complies with federal and state regulations concerning employment of persons with disabilities, including the Americans with Disabilities Act (ADA). The Agency is committed to providing reasonable assistance to applicants and employees who experience difficulties in the application process and/or at work because of a health condition or disability. The Agency also recognizes the experience can be different for each individual and may include difficulties with communication, concentration, and/or interaction with others. Other abilities could be affected such as mobility, sight, speech, breathing, sitting, hearing, learning, etc. An individual could experience difficulties with one or more of these abilities.

In addition to providing reasonable accommodations for differently-abled persons, TI welcomes diversity of religious beliefs and practices and is committed to providing reasonable religious accommodation that facilitates employees’ religious practices and observances.

**PROCEDURE:**

*Disability Accommodation*

Qualified applicants or employees experiencing a physical or mental disability, which requires accommodation to perform the essential functions of the job, should inform their hiring manager or supervisor immediately, in writing, if an accommodation is being requested.

Once a request for accommodation is received, the supervisor or hiring manager will review with the requesting party. The supervisor may also consult with Human Resources or the Executive Director. The Agency will consider the request, however, reserves the right to offer its own accommodation to the extent permitted by law. The Agency will consider cost and whether the requested accommodation will impose undue hardship on business operations, or other employees, when determining a reasonable accommodation.

Some additional considerations:

1. An employee may be required to provide documentation supporting a disability, including medical certification.
2. If a reasonable accommodation is readily available, the request will be approved and the accommodation implemented.
3. If an accommodation is not readily ascertainable, the matter will be pursued further with assistance from appropriate external resources.



## *Religious Accommodation*

Qualified applicants or employees may request an accommodation when their religious beliefs require modification of dress code, Agency practices, policies, procedures, and other aspects of employment.

Once a request for accommodation is received, the supervisor or hiring manager will review with the requesting party. The supervisor may also consult with Human Resources or the Executive Director. The Agency will consider the request, however, reserves the right to offer its own accommodation to the extent permitted by law. The Agency will consider cost and whether the requested accommodation will impose undue hardship on business operations, or other employees, when determining a reasonable accommodation.

Some additional considerations:

1. Under no circumstances will the Agency question the validity of a person's religious beliefs.
2. If a reasonable accommodation is readily available, the request will be approved and the accommodation implemented.
3. If an accommodation is not readily ascertainable, the matter will be pursued further with assistance from appropriate external resources.



POLICY #: HR9036	TOPIC: <b>Personnel Grievances</b>	DATE:
COA CORE/PRACTICE STANDARD(S):		APPROVED BY:

**POLICY:**

The scope of this policy and procedure is limited to Agency actions or inactions, or the actions or inactions of another employee, which adversely impact the reporting employee. TI also has a policy regarding reporting suspicious behavior and a general grievance policy and procedure for use by any stakeholder to report complaints or grievances which are not HR related.

The Agency expects and encourages regular, transparent, and respectful communication between staff and management, so the interests of both the staff and the Agency are best served.

This policy and procedure provides a mechanism for personnel to raise concerns about the workplace, and to report grievances on matters related to the terms and conditions of their employment, without interference or retaliation. The goal of this policy and procedure is to establish a clear and logical grievance process in which complaints are handled impartially and confidentially, in which the Agency exercises due process and due diligence, conducts prompt investigations, and arrives at fair resolutions.

*Overview*

1. Defining Grievable Issues

This policy pertains only to Agency actions or inactions, or the actions or inactions of another employee, which have adversely impacted the reporting employee. The following qualify as grievable issues under this policy:

- a. An Agency policy, rule, or procedure that is adversely affecting the reporting employee.
- b. An adverse employment action, such as a disciplinary action or involuntary separation.
- c. An action or inaction by the Agency that is negatively impacting the reporting employee’s work environment.
- d. An action or inaction by an employee that is negatively impacting the reporting employee’s work environment.

2. Informal Resolution

It is recommended that the employee attempt to have an informal discussion first with the direct supervisor to identify an appropriate resolution for a grievance. Should the grievance issue(s) persist and remain unresolved, or if the employee is being adversely impacted by a decision, or the employee does not believe a discussion with the direct supervisor is appropriate, a more formal grievance process may be necessary.



### 3. Exceptions and Other Considerations

- a. Informal resolution is not appropriate if the underlying allegations are related to sex discrimination and/or involve violence, intimidation, a hostile work environment, or other violent actions, or if the alleged violation relates to prohibited discrimination.
- b. Where a grievance relates to an Agency policy or procedure which has its own complaint and/or grievance procedure, that specific procedure overrides this policy.
- c. A formal grievance can be filed by more than one employee, where each participating employee must sign the required written statement.
- d. The Agency may employ mediation to remedy a grievance between two or more personnel.
- e. The Agency may need to identify, locate, and involve witnesses during the investigation of a grievance. Witnesses are required to cooperate fully with the investigation. All parties involved are required to maintain confidentiality regarding details of the grievance and the investigation. Failure of any employee, including the reporter, to fully cooperate with an investigation or maintain confidentiality regarding a grievance or a grievance investigation may result in disciplinary action, up to and including termination of employment.
- f. Personnel shall not be discriminated or retaliated against for reporting a grievance or for participating as a witness in a grievance investigation. Anyone who violates the protections for these employees, including a breach of confidentiality, will be subject to disciplinary action, up to and including termination of employment.

### **PROCEDURE:**

The steps outlined herein establish the Agency's formal grievance process:

1. Prepare a written statement which includes the following:
  - a. The nature of the grievance.
  - b. Detailed information including evidence of the issue, witnesses, related policies and supporting documentation.
  - c. The remedy or desired outcome.
2. Submit a written statement to the Human Resources Director which includes supporting documentation noted above. The Human Resources Director will schedule a meeting with the reporting employee. If it is determined that the concern identifies a grievable issue, the Human Resources Director will conduct a thorough internal investigation and prepare a report with findings. The reporting employee will receive a response from Human Resources regarding the issue within five (5) working days. A copy of the report will also be supplied to the Executive Director. The response will include an explanation of any further appeal, rights, or recourse. In the event the Executive Director is the subject of the grievance, the Human Resources Director will supply the report to the Board President.
3. If at this step the employee is not satisfied with the result of the investigation the employee may appeal the decision by submitting a written statement to the Executive Director, requesting reconsideration. The Executive Director will review the grievance, the investigative report, and all supporting documentation and may speak with the



reporter as part of the review process. The Executive Director will notify the reporter and Human Resources Director in writing of the decision within 30 days. This is the last step in the formal personnel grievance process and is final.

4. If the Executive Director is the subject of the grievance, the employee should direct the appeal to the Board President.
5. No member of agency administration will be directly or indirectly involved in a decision or resolution of a grievance for which they are the subject.
6. The TI Leader Committee conducts a quarterly review of documented grievances, which involves:
  - a. Identifying trends/patterns in type, frequency, and resolution of occurrences, indicating possible areas for further administrative review.
  - b. Recommending if further action or intervention is required.
  - c. Verifying compliance with policy and procedure.
  - d. Identifying areas for process improvement.
7. No member of the TI Leader Committee will be directly or indirectly involved in the decision or resolution of a grievance for which they are the subject.
8. All grievances received, actions taken, investigative reports, resolutions reached, and related notifications will be documented and tracked in a secure and confidential manner by the Human Resources Director.



POLICY #: HR9028	TOPIC: <b>Personnel Records</b>	DATE:
COA CORE/PRACTICE STANDARD(S):		APPROVED BY:

**POLICY:**

TI retains and maintains paper and electronic employment-related personnel records for each employee, including medical records, in compliance with local, state, and federal law and in compliance with the Tennessee Department of Children Services (DCS) policy. Personnel records are kept in an individual personnel file, which serves as the official employment record of an employee.

The following policy and procedure outlines:

1. what records are kept the personnel file,
2. the unit responsible for retaining and maintaining personnel records,
3. the process for employees to access and review personnel records,
4. which personnel records are accessible by employees, and
5. who can access employee personnel records.

**PROCEDURE:**

*Overview*

The personnel file is the official employment record of an employee. It is the property of The Agency and cannot be duplicated without explicit permission from the Human Resources department head or the Executive Director.

*Contents of Personnel File*

The following list summarizes what documents are considered personnel records and are compiled to function as the employee personnel file. The list denotes which records are available for review by employees and which are excluded from review by employees:

Personnel File Records **Available** for Review by Employees

- Basic employee information (name, address, and phone number) and emergency contact details
- IRS tax withholding forms, such as W-4s and/or W-9s
- Payroll and compensation information
- Contracts or agreements between the employee and the Agency, such as an agreement relating to Agency-loaned equipment or a business credit card
- Forms relating to employee benefits, such as enrollment forms and beneficiaries
- Application form with resume
- Offer letters, conditional and final
- Job description





- Signed acknowledgement of Employee Policy Manual
- Personnel action forms, documenting job, location, salary, and status changes
- Required job-related certifications and insurance coverages
- Performance management documents, including training records, performance plans, and performance evaluations
- Authorizations for deduction or withholding of pay
- Mandatory Continuing Education records
- Background check and drug test results
- Time and attendance logs
- Disciplinary action forms and supporting documents

#### Personnel File Records **Excluded** for Review by Employees

- Employment eligibility documents, including I-9 and supporting documentation
- EEO records
- Child support/garnishments and/or legal or litigation documents related to employment
- Workers' compensation claims
- Letter(s) of reference/interview notes from reference checks
- Internal investigations relating to possible criminal offenses or violations of Agency policy
- HIPAA-protected medical information related to pre-employment and leave certifications
- Any other documents that the Agency considers to be confidential, proprietary or privileged

#### *Maintenance of Personnel File*

Personnel are responsible for keeping current data on file with the Agency, such as contact information, name changes, tax withholdings, direct deposit accounts, etc. The Human Resources department will be responsible for maintaining accurate, compliant, and up-to-date personnel files. Paper and electronic personnel records are to be stored in a secure location and kept strictly confidential. Records will be kept for the duration of an employee's time with the Agency, unless otherwise mandated by law.

#### *Accessing Personnel Records*

All personnel records are kept confidential and access is granted on a "need-to-know" basis only. This includes, but is not limited to, Human Resources, direct supervisor, and management in reviewing the file for possible promotion, transfer, or layoff.

#### Current Employees

An employee who wishes to review their personnel and/or medical file may do so after giving the Agency reasonable and written notice. Review and inspection of the personnel file will be granted within thirty (30) days of written request and will only occur in the presence of an authorized Agency representative during regular business hours. The Agency has the right to redact the names of any non-management employees. Details of information reviewed in the personnel file are expected to be kept confidential.



Records may not be removed from the personnel file under any circumstance. An employee who takes issue with the accuracy of information contained with the personnel file may submit a grievance to Human Resources. The filed grievance will become part of the Personnel File.

### Former Employees

All personnel records are kept for a least one (1) year after an employee has separated from the Agency. A former employee who wishes to review their personnel and/or medical file may do so after giving the Agency reasonable and written notice. A copy of the personnel file will be supplied within thirty (30) days of written request and upon receipt of a signed release of information form and duplication fee. The Agency has the right to redact the names of any non-management employees.

### Third Party Request

Occasionally, the Agency may receive a third-party request for access to personnel records or confidential information contained in the personnel record, as a result of a claim or complaint by a current or former employee, a criminal investigation by a legal or governmental entity, or to satisfy federal program requirements (e.g. child support collection). The third-party must be a legitimate legal or governmental entity to warrant cooperation and compliance from the Agency.

The Agency will make every effort to give reasonable notice to an employee when a request is received, unless the employee has signed a waiver as part of a signed application, or the disclosure is ordered to a party in a legal action or arbitration, or if the information is requested as a result of a claim or complaint by a current or former employee as part of a criminal investigation by a legal or governmental entity.



POLICY #: HR9020	TOPIC: <b>Agency Social Events</b>	DATE:
COA CORE/PRACTICE STANDARD(S):		APPROVED BY:

**POLICY:**

TI will occasionally host social events for employees where attendance is voluntary and does not constitute work-related responsibilities.

Alcoholic beverages may be available at these events where clients, partners, and other key stakeholders may also be present. An employee who chooses to consume alcohol at an event is expected to do so in a responsible manner and not in excess. Attendees are strongly advised to not drink and drive, especially where faculties have been significantly and noticeably impaired.

While an Agency-sponsored event is meant to be a fun practice and foster goodwill and teambuilding amongst employees, in order to maximize enjoyment for all attendees, TI employees are expected to adhere to Agency policies which govern standards of conduct.

**PROCEDURE:**

1. Employees who plan to consume alcoholic beverages should coordinate transportation from the event or attend the event with a designated driver. If an employee cannot coordinate transportation from the event or does not have a designated driver, please notify someone who can arrange for a taxi or other ride-sharing service.
2. The dress code for an Agency-sponsored event will be consistent with the existing Agency policies on dress code and personal appearance, unless otherwise noted.
3. While not employees of the Agency, guests of agency employees in attendance, who are non-minors, are also expected to behave in accordance with the Agency’s code of conduct. The Agency reserves the right to ban a guest from future events if an incident or violation occurs and is deemed severe enough.
3. Violations of Agency policy while in attendance at an Agency-sponsored event, especially where misconduct is concerned, will be addressed with the party or parties involved. Serious violations and gross misconduct will be subject to disciplinary action, up to and including termination of employment.



POLICY #: HR9009	TOPIC: <b>Confidentiality and Nondisclosure</b>	DATE:
COA CORE/PRACTICE STANDARD(S):		APPROVED BY:

**POLICY:**

Security and confidentiality of confidential information is of the utmost importance at Therapeutic Interventions. It is the responsibility of every employee to respect and maintain the security and confidentiality of confidential information. This includes notifying the Agency when a suspected or actual breach of confidentiality has occurred.

A violation of this policy may result in disciplinary action or, in some cases, civil liability.

For the purposes of this policy, "Confidential Information" is defined as non-public information about a person or an entity that, if disclosed, could reasonably be expected to place either the person or the entity at risk of criminal or civil liability, or damage the person or entity's financial standing, employability, privacy or reputation. The Agency is bound by law or contract to protect some types of confidential information, and in other instances the Agency requires protection of confidential information beyond legal or contractual requirements as an additional safeguard.

Examples of "Confidential Information" include but are not limited to:

1. client files;
2. payroll and personnel records;
3. protected health information (PHI);
4. self-restricted personal data, such as social security numbers;
5. credit card information;
6. passwords and other IT-related information;
7. Agency financial and account information.
8. proprietary information

Individual offices, departments, or programs may have additional types or kinds of information that are considered "Confidential Information" and are covered by this policy. "Confidential Information" includes information in any form, such as written documents or records, or electronic data.

**PROCEDURE:**

Authorized Release of Information

Due to the nature of services provided by the Agency, and the regulatory protections for clientele served, strict confidentiality must be common practice among all employees. Information regarding Agency business, employees or clients will only be released to people or agencies outside the Agency with written consent from TI and/or proper authorities. Following legal or regulatory guidelines provides the only exception to this policy.



Please refer to the Agency's Client Policy Manual and the HIPAA Statement of Compliance for more information on protocols for handling confidential information.

### Third Party Inquiries

From time to time, our Agency may become involved in news stories or potential or actual legal proceedings of various kinds. When this happens, lawyers, former employees, newspapers, law enforcement agencies, and other outside persons may contact our employees to obtain information about the incident or the actual or potential lawsuit.

If you receive such an inquiry, whether written (e.g. letter, email, text) or verbal (e.g. phone call, in-person), you are instructed to not discuss the matter with the inquiring party.

All communications should be directed to the corporate office and the Executive Director must be immediately notified the contact was made. In the event a media representative approaches any Agency location, they are to be escorted to the Executive Director's office and asked not to talk to staff and/or clients until appropriate authorization has been received from the Executive Director.

If you are not certain what to do when such contact is made, or you have any other questions concerning this policy, please contact your supervisor.



POLICY #: HR9014	TOPIC: <b>HIPAA Statement of Compliance</b>	DATE:
COA CORE/PRACTICE STANDARD(S):		APPROVED BY:

The Agency maintains protected health information (PHI) on all clients due to licensure/contractual requirements, in compliance with HIPAA regulations. Therapeutic Interventions and its employees seek to keep all facts about client's private health information protected and confidential. Information will only be released with written permission from the client or the client's guardian/conservator, if court ordered, with the written consent of the subject of the request, or through the consent given via contract or service agreements. To maintain confidentiality of information, Therapeutic Interventions stores files using secure manual and electronic security procedures. These methods include locked files, user authentication, a server firewall, separate and secure personnel files containing health information, and a password protected web-based client database.

*Statement of Compliance*

Therapeutic Interventions agrees to protect all PHI against reasonable anticipated threats or hazards to the security or integrity of the information and to prevent unauthorized uses or disclosure of PHI.

PHI may be disclosed to obtain medical treatment or services.

Therapeutic Interventions has in place a Privacy Statement to inform clients and staff of their rights under the HIPAA Guidelines. Employees will be trained during the orientation process and will be updates will be incorporated into the current trainings.

The Executive Director will act as a Privacy Officer and will:

- Oversee the development and implementation of privacy policies and procedures and update management on any changes.
- Oversee implementation and compliance with HIPAA and conduct periodic assessments of compliance with privacy rules
- Develop Corrective Action Plan for any deficiencies
- Oversee Staff Training on HIPAA requirements
- Serve as the internal privacy consultant
- Oversee development of appropriate forms for compliance with HIPAA rules
- Serve as liaison for any government contact or review of agency's compliance
- Maintain current knowledge of HIPAA rulings

The following administrative, technical, physical and procedural safeguards are in place to ensure the integrity and confidentiality of all PHI received:



## **Plan of Security**

Employees are required to comply with our established privacy policies and procedures, which exist to protect the confidentiality of client information.

A criterion of minimum access is in place for employees using the client database. Employees access PHI only on a 'need to know' basis, and in accordance with job classification, to provide services or care for clients and staff members.

Both manual and electronic security procedures are used to maintain confidentiality of information. Such methods include locked files, user authentication and firewall technology. Employees receive periodic training on issues of HIPAA Compliance and Client Confidentiality.

Personnel are asked to be vigilant in maintaining confidentiality of client information at their workstations; to be aware of their monitors, desk and files by making sure that they are HIPAA compliant at all times.

## **Protecting Information**

Therapeutic Interventions employees will ensure confidentiality and privacy regarding history, records, and discussions about the individuals we serve or employees and individuals applying for employment with the agency. Personnel shall not disclose any information about a person, including the fact that the person is or is not served by the organization, to anyone outside this organization unless authorized by the Executive Director or other authorized party. The principle of confidentiality is to be maintained in all programs, departments, functions, and activities. Therapeutic Interventions shall ensure that all information created or data collected, directly or indirectly, in any medium, which identifies a child and their family, shall be kept confidential in order to protect their privacy. Client case files and related information are official records which have been designated confidential by law and will be safeguarded in accordance with applicable statutes, rules, policies, and ethical standards. All client records are labeled as "Confidential" and are maintained in secured files. Reasonable precautions, including safeguards from tampering, theft, fire or water damage, environmental hazards, and natural disasters, will be implemented.

Therapeutic Interventions personnel must take reasonable measures to protect the privacy of all verbal exchanges or discussions of confidential information, regardless of where the discussion occurs. Enclosed offices, interview rooms, or other secure locations will be available for the verbal exchange of confidential information, either in person or via phone. Therapeutic Interventions personnel must ensure that observable confidential information on computer screens is adequately shielded from unauthorized disclosure.

Suggested means for ensuring this protection include:

- Use of polarized screens or other computer screen overlay devices that shield information on the screen
- Placement of computers out of the visual range of persons other than the authorized user
- Clearing information from the screen when not being used; locking-down computer workstations when not in use



- Using passwords on computers and phones that access or contain confidential information, and not allowing others to use or access computers and phones (including personal phones or computers that are access or contain confidential information)
- Securing documents in a locked file when transporting in a vehicle for business use
- Other

Therapeutic Interventions personnel must safeguard and prevent unauthorized access to documents containing confidential information that are located on:

- Desks
- Fax machines
- Photocopy machines
- Portable electronic devices (e.g., laptop computers, cell phones)
- Computer printers
- Removable media (e.g., CDs, thumb drives, etc.)
- Common areas (e.g., break rooms, restrooms, elevators, etc.)

Backup of any electronic information shall be maintained in a manner to ensure confidentiality.

### **Release of Information**

Therapeutic Interventions shall also comply with federal regulations, court mandates, legal settlements, and accreditation standards concerning the confidentiality of child-specific record information.

Release of information forms will be explained and completed in the presence of the person about whom any information may be released prior to any release of information. Therapeutic Interventions shall provide clients with the following Notice of Privacy Statement within the client handbook to clarify under what circumstances information may be released to outside parties.

If records are to be inspected by an outside agency, the individual(s) who inspect the records must be specifically authorized to do so by the Executive Director or other authorized party. The copying of records or removal of records is specifically prohibited in such cases. For clients in custody of the Department of Children’s Services, all appropriate policies and procedures regarding confidentiality of client records shall be complied with.

Employees will not discuss any individual’s record with unauthorized individuals, whether on or off duty.

Due to the nature of the clientele and services provided by Therapeutic Interventions, strict confidentiality must be common practice among all employees. Information regarding Therapeutic Interventions business, employees or clients will only be released to people or agencies outside the company with written consent from Executive Director and/or proper authorities. Following legal or regulatory guidelines provide the only exceptions to this policy.

Information contained in client records is protected by Federal law. Federal Regulation (42, CFR, Part 2) prohibits disclosure of information in client records without the specific written consent of the person to whom it pertains, or as otherwise permitted by such regulations. A general authorization for the release of medical or other information is not sufficient for this purpose.





All reports, memoranda, notes or other documents will remain part of the company's confidential records. Business operations, client information and employee records and reviews are also classified as confidential.

## 1. Client Information

All client information, including name, address, phone number, placement information, documented material in the client file as well as any case discussion/staffing regarding client situation is to remain strictly confidential and can be released only upon receiving proper approval.

Written approval must be obtained from appropriate State officials prior to the release of any information to the media. This includes name, photo, video, taping, etc.

## 2. Employment Records

Responses to written requests for verification of employment will be made on the form provided and only when the request is accompanied by a former or current employee's signed authorization of release.

A written verification of employment form that has been completed by the Human Resources department will be returned directly to the requesting party.

Other employee information, including name and contact information, as well as other will only be released to people or agencies outside the company with a signed authorization from the employee, Executive Director and/or proper authorities.

Employee information is to remain confidential and should not be discussed between employees. Hiring, dismissal, salary, transfer, demotion, reprimand and all other sensitive and adverse information regarding employees is of a strictly confidential nature.



POLICY #: HR9034	TOPIC: <b>Conflict of Interest</b>	DATE:
COA CORE/PRACTICE STANDARD(S):		APPROVED BY:

**POLICY:**

As a basic condition of employment, all personnel have a responsibility to act in the best interest of the Agency by not engaging in activities that are in competition with the Agency’s own interests. The policy and procedure contained herein establishes guidelines around job-related and/or external activities that create actual or potential conflicts of interest.

Any actual or potential conflict of interest or commitment between an employee of the Agency and a competitor, supplier, distributor, or contractor to the Agency, must be disclosed by the employee to his or her supervisor, Human Resources, or the Executive Director. If an actual or potential conflict of interest is determined to exist, the Agency will take steps, as it deems appropriate and necessary, to reduce, eliminate, or proactively manage this conflict.

**PROCEDURE:**

*Overview*

The purpose of this policy is to establish guidelines for conflicts of interest or commitment that might arise in the course of an employee’s job duties and external activities. This policy is not intended to unreasonably limit external activities, but instead seeks to emphasize the need to disclose conflicts and potential conflicts of interest and commitment, to manage such conflicts and to ensure that the Agency’s interests are not compromised.

**General Guidelines**

1. This policy applies to all personnel.

Non-staff, including governing body members, advisory group members, and consultants who have a financial interest in the organization’s assets, business transactions, leases, or professional services are subject to this policy under the purview of voting on such interests, and will not participate in any discussion or vote taken with respect to such interests.

2. An employee’s activities should not damage the Agency’s reputation, compete with the Agency’s interests, or jeopardize the Agency’s business activities, or reasonably appear as doing so.
3. In addition, an employee must not profit or otherwise gain advantage from participation in the Agency’s business activities, nor should there be a chance that the employee’s job duties or participation in other



Agency activities could reasonably appear to affect the external activity or the interests of an external entity in which the employee, or relative, has a financial interest. The definition of “relative” for the purpose of this policy includes, but is not limited to, spouses, civil union partners, domestic partners, and other familial relationships, immediate or removed.

4. Where an employee or an employee’s relative is engaged in an external activity or has a financial interest, full disclosure is necessary if there is a chance that the interest or activity could reasonably appear to affect or be affected by the employee’s decisions, actions, or participation in the Agency’s business activities. Further to this point, an employee must refrain from external activities involving personal gain or financial benefit for self or for relatives in which they use, appear to use, or likely have the opportunity to use confidential information or special knowledge gained as a result of their employment by the Agency and/or participation in other Agency business activities.
5. An employee must not engage in the unauthorized use of the Agency’s Resources for personal benefit or for the benefit of any other person or external organization.

## **Gifts**

Employees, especially those in management and supervisory roles, must exercise good judgment in giving or receiving gifts or entertainment. It is sound practice to discourage personal gifts and favors from entities and individuals with personal or business relationships with the Agency.

Employees involved in awarding or administering contracts using federal or other government funds are prohibited by law from soliciting or accepting gratuities, favors, or anything of monetary value from contractors or potential contractors.

Personal gifts of more than nominal value should be declined or returned to avoid any appearance or suggestion of improper influence. Entertainment or travel with a more than nominal value paid for by an external individual or entity must first be disclosed to and approved by the direct supervisor, Human Resources, or the Executive Director.

## **Referrals**

While the Agency does not employ a formal referral process whereby prospective opportunities – recruitment, business, or otherwise – are recommended by an individual or entity which has an existing relationship with the Agency, the following practices are prohibited:

1. making or accepting payment or other consideration in exchange for referrals;
2. preferential treatment of organization members, community partners, members of the organization's governing body, advisory groups, personnel, or consultants applying for and receiving the organization’s services; and



- steering or directing referrals to private practices in which personnel, consultants, or the immediate families of personnel and consultants are engaged.

### **Nepotism & Preferential Treatment**

An employee must disclose a familial relationship if it appears to create a conflict of interest or casts doubt on the fairness or integrity of the Agency's employment or business decisions.

Employees must avoid favoritism or the appearance of favoritism that may be associated with making employment or business decisions based on kinship or relatedness, more specifically a person with whom the employee has a legitimate familial relationship.

Additionally, an employee may not make, participate in, or attempt to influence employment decisions (e.g. hiring, promotion, supervision, and termination) or business decisions involving a person with whom the employee has a legitimate familial relationship.

### **Fraternization**

An employee must disclose a personal, romantic, sexual, or external business relationship if it appears to create a conflict of interest or casts doubt on the fairness or integrity of the Agency's employment or business decisions.

Sexual, romantic, or familial relationships are not permitted between employees where there is a direct or indirect reporting relationship and especially where one has the ability to influence the employment status of the other. Employment of relatives, or of someone with whom a current employee resides, in the same department is discouraged and should be disclosed to the direct supervisor, Human Resources, or the Executive Director.

Additionally, an employee may not make, participate in, or attempt to influence employment or other business decisions involving a person with whom the employee has a sexual or romantic relationship. Sexual and romantic relationships are also addressed in the Sexual Harassment and Discrimination policy.

### **Moonlighting**

The Agency recognizes that employees may seek additional employment during off-hours, but expects, in these cases, that any outside employment will not affect job performance, work hours, or scheduling, or otherwise adversely affect the employment relationship or reflect negatively on the Agency.

Outside employment which creates a conflict of interest, or which affects the quality or value of an employee's work performance or availability to perform job duties at the Agency, is prohibited.



Any outside employment, regardless of conflicts, must be reported to the direct supervisor, Human Resources, or the Executive Director.

## **Disclosures**

Self-disclosure is an important and proactive response to an actual or potential conflict of interest, and it allows personnel, governing body members, advisory group members, and consultants to protect their personal and professional reputation from embarrassing or harmful allegations of inappropriate conduct.

Employees are encouraged to seek guidance from their supervisor or Human Resources, even if their situation is not directly covered by the disclosure obligations in this policy.

Disclosures, as required by this policy, must be in writing to the direct supervisor, Human Resources, or the Executive Director, when an employee becomes involved in external activities covered in this policy, or becomes aware of an actual or potential conflict of interest, or becomes involved in a sexual, romantic, or external business relationship covered in this policy.

Disclosures should provide details such as:

- a. the nature of the external activity or financial interest, potential or actual role in the external activity.
- b. whether there is compensation or other financial gain associated with the external activity.
- c. the nature of a familial relationship.

## *Management Plans*

Human Resources will respond to the disclosure and identify whether a written management plan is necessary. Depending on the nature of the conflict, a written management plan should be devised by, as appropriate, the Executive Director, the Regional Director, or Human Resources and must be approved by the Regional Director and kept on file with Human Resources.

At a minimum, management plans must:

- a. address the external activity, interest, or commitment in a way that will ensure that it will not interfere with the interests of the Agency,
- b. confirm and ensure the employee is not participating in making decisions on behalf of the Agency where the external activity, interest, or commitment will cast doubt on the fairness or integrity of the Agency's business activities and employment decisions, and
- c. establish a review and approval process as appropriate. Review of the established plan should occur at least annually and whenever there is a significant change in reporting relationships.



### *Failure to Disclose*

Failure to disclose an actual or potential conflict of interest or commitment, or to comply with an established management plan, is a violation of this policy and may result in corrective action up to and including termination of employment.



POLICY #: HR9015	TOPIC: <b>Drug and Alcohol Policy</b>	DATE:
COA CORE/PRACTICE STANDARD(S):		APPROVED BY:

**POLICY:**

TI recognizes alcohol and drug abuse as potential health, safety, and security problems. The Agency expects all employees to assist in maintaining a work environment free from the effects of alcohol, drugs, or other intoxicating substances and further encourages any employee who may suffer from an addiction or substance abuse disorder to seek professional care and treatment.

Compliance with this substance abuse policy is made a condition of employment, and violations of this policy will result in serious disciplinary action, up to and including termination of employment.

**PROCEDURE:**

1. Employees shall not report to work under the influence of alcohol, illegal drugs, or any controlled substance or prescription drug not medically authorized. Prescription drugs, which may affect an employee's ability to concentrate, affect equilibrium, or impair reactions, must be reported to the immediate supervisor. A physician's statement attesting the prescribed dosage level is consistent with the safe performance of the employee's duties may be required.
2. Employees shall not possess or use alcohol, illegal drugs, or any controlled substance or prescription drug not medically authorized while on Agency property, while representing the Agency, or while conducting business on behalf of the Agency.

The Agency reserves the right to require a drug and/or alcohol test of any employee after an accident, on a random basis, or on the basis of reasonable suspicion, as a necessary part of a comprehensive program to maintain a drug-free workplace.

Reasonable suspicion includes, but is not limited to, physical evidence of use, giving the appearance of being under the influence, apparent and significant impairments affecting work performance or a substantial drop off in work performance, and the causing of an accident. Drug and alcohol tests will be administered by a licensed, third-party medical facility of the Agency's choosing. Refusal to submit to a drug and alcohol test, for any of the reasons mentioned in this policy, will result in disciplinary action, including possible termination of employment.

Use of Over-the-Counter and Prescribed Medications

The Agency also strongly cautions against the use of prescribed or over-the-counter medication which can affect an employee's ability to perform his or her job safely, or the use of prescribed or over-the-counter medication in a manner violating the recommended dosage or instructions from the physician. Employees must have a valid prescription for any prescribed medication used while performing work responsibilities. Please inform your supervisor prior to working



under the influence of a prescribed or over-the-counter medication that may affect your ability to perform your job safely.

If the Agency determines that the prescribed or over-the-counter medication poses no safety risk, you will be permitted to work. Failure to comply with these guidelines concerning prescription or over-the-counter medication may result in disciplinary action, up to and including termination of employment.

### Reporting a Drug Conviction

An employee will notify the supervisor of any criminal drug statute conviction for a violation no later than five (5) days after such conviction. Within thirty (30) days of receiving notification, the Agency may apply disciplinary action up to and including termination of employment, or the requirement of satisfactory participation in an approved substance abuse assistance or rehabilitation program.

If the employee has already sought help from a private medical provider, evidence of enrollment in a drug program and subsequent progress must be provided to Human Resources.

All information and requests for assistance will be handled in a confidential manner.





POLICY #: HR9019	TOPIC: <b>Non-Solicitation Policy</b>	DATE:
COA CORE/PRACTICE STANDARD(S):		APPROVED BY:

**POLICY:**

To avoid disruption of business operations or disturbance of employees, visitors, and others, the Agency has implemented a non-solicitation policy.

For purposes of this policy, “solicitation” includes canvassing, soliciting or seeking to obtain membership in or support for any organization, requesting contributions, and posting or distributing handbills, pamphlets, petitions, and other materials on Agency property or using Agency resources. Solicitation through verbal, written, or electronic means is covered by this Non-solicitation Policy.

Employees are also prohibited from soliciting other employees for any cause during their assigned working time. For this purpose, working time means time during which either the soliciting employees, or the employees who are the object of the solicitation, are expected to be actively engaged with assigned work. Employees may conduct solicitations during their lunch period, coffee breaks, or other authorized non-work periods, so long as they do so when the other employees are on their lunch or break periods and the employee is not violating and other Agency policy in doing so.

Employees are prohibited from soliciting an employee who requests not to be solicited, even if on a break period.

Violation of this policy will result in a verbal or written warning, however, repeated offenses may result in more severe disciplinary action, including and up to termination of employment.



POLICY #: HR9046	TOPIC: <b>Safety and Security</b>	DATE:
COA CORE/PRACTICE STANDARD(S):		APPROVED BY:

**POLICY:**

At Therapeutic Interventions, the physical health, safety, and security of our employees, clients, families, professionals, and the general public is of essential importance.

To ensure our health, safety, and security standards, the Agency:

1. enforces a strict policy against weapons on company property
2. prohibits smoking on or around Agency property and in vehicles while transporting clients
3. mandates the responsible safeguarding of keys, and other materials and information, used to access Agency facilities.
4. conducts regular facility safety and maintenance checks

It is the responsibility of every employee to assist the Agency in maintaining a healthy, safe, and secure work environment by adhering to this policy.

**GUIDELINES:**

Non-Smoking Policy

TI is concerned about the effects of smoking, vaping and secondhand smoke inhalation on its employees and clients, therefore, smoking or vaping in or around the office, client areas, and restrooms is prohibited. Smoking or vaping in a vehicle while transporting clients is also prohibited.

Weapons Policy

No person shall possess or have control of any firearm, deadly weapon, or prohibited knife, as legally defined, while on Agency property or while conducting Agency business, except as required in the lawful course of business or as authorized by law.

Maintaining Workspace

Every employee is responsible for helping to make this a secure work environment. Upon leaving work, all desks, lockers, and doors protecting valuable or sensitive material the work area must be locked. Lost or stolen keys, access passes, or other similar devices must be reported immediately to the direct supervisor.

Employees are expected to refrain from discussing with non-employees specifics regarding Agency security systems, alarms, passwords, etc. Supervisor should be immediately notified of any known or potential security risks and/or suspicious conduct of employees, clients, or guests of the Agency.



All known or suspected safety hazards, and occupational illnesses or injuries, must be reported to the direct supervisor immediately along with necessary documentation. Failure to follow health and safety rules can result in disciplinary action, up to and including termination of employment.

### Inspections

Therapeutic Interventions shall conduct monthly Facility Safety & Maintenance checks. This will be completed at each of the three office locations. This is set forth to ensure the safety of all employees, clients, and other visitors. These checks will be documented and kept on file at each individual location once completed. A copy of each inspection will also be kept on file at the administrative office for all three locations. These inspections will be completed by one of the following employees: Regional Director, Administrative Assistant, and/or Office Administrator. Any issues or concerns will be reported to the Executive Director immediately. Should any issues or concerns arise, a plan of action will be discussed and documented on the Monthly Maintenance Checklist.

### *Procedures*

- a. Monthly Inspections will be completed to ensure that facilities are safe. This includes the following:
  - i. Electrical functioning properly & unused outlets covered
  - ii. Plumbing functioning properly
  - iii. HVAC functioning properly
  - iv. Office Furniture in working order
  - v. Cleaning supplies and all other chemicals stored properly
- b. Preventive Maintenance will be conducted by a qualifying professional and documented on the Monthly Facility Safety & Maintenance Checklist for all occurrences.
  - i. Should preventive maintenance need conducted, a ticket will be submitted to the property management office(s) and the Executive Director will be notified
  - ii. Preventive maintenance needed will be documented and followed up on within 7 working days to ensure completion and/or additional actions required. Once completed, the completed date will be documented on the Monthly Maintenance Checklist
- c. Emergency Maintenance and Potentially Hazardous Conditions will be addressed immediately upon discovering there is an issue. A Monthly Facility Safety & Maintenance Checklist will be completed for all issues relating to Emergency Maintenance and Potentially Hazardous Conditions.
  - i. TI Employee(s) will assess the situation
  - ii. Regional Director and/or Executive Director will be notified
  - iii. Property Management will be contacted, if necessary, depending on the issue.



POLICY #: HR9030	TOPIC: <b>Information Systems and Communications</b>	DATE:
COA CORE/PRACTICE STANDARD(S):		APPROVED BY:

**POLICY:**

The Agency’s information technology systems and the information transmitted and stored by those systems are valuable and vital assets to the Agency. This policy is intended to establish the guidelines associated with the use of the Agency’s systems.

For the purpose of this policy “systems” includes all computer systems (hardware and software), communication systems (voicemail, email, and internet), and information (fax, data, text images, etc.) in any form, on any media. This policy applies to all employees, contractors, vendors, partners, or associates, and any other individual accessing and/or using the Agency’s systems through onsite or remote terminals.

**PRODECURE:**

General Guidelines

Therapeutic Interventions systems and services are intended for business activity and must be protected against activity that does not represent the business interests of the Agency. Systems and services may include, but are not limited to, local area network access, dial-in network access, shared file space, cloud systems, intranet portals, and email.

The Agency’s information technology systems and data that reside on them are Agency property and may only be used where legally permissible and as expressly authorized by the Agency. As a user of information resources, you are responsible for knowing about appropriate and ethical use of information in all environments you access, protecting the information you are using from corruption or unauthorized disclosure, working in such a manner as to consider the access rights of others, and following applicable guidelines concerning the use and nondisclosure of passwords and other means of access control.

Voicemail, Email, and Internet Use

1. The system, and all data transmitted or received through the system, are the exclusive property of the Agency. No individual should have any expectation of privacy in any communication over this system. Any individual permitted to have access to the Agency’s system will be given an email and/or Internet address and/or access code, and will have use of the system, consistent with this policy.
2. The Agency reserves the right to monitor, intercept, and/or review all data transmitted, received, or downloaded over the system. Any individual who is given access to the system is hereby given notice that the Agency will exercise this right periodically, without prior notice and without the prior consent of the user.



The Agency's interests in monitoring and intercepting data include, but are not limited to protection of Agency proprietary and classified data, managing the use of the Agency's computer system, preventing the transmission or receipt of inappropriate materials by employees, investigating reported misuse of Agency systems, and/or assisting the employee in the management of electronic data during periods of absence.

No individual should interpret the use of password protection as creating a right or expectation of privacy. In order to protect all systems users, no one can have a right or expectation of privacy with regards to the receipt, transmission or storage of data on the Agency voicemail/email/internet system.

3. Access to the Internet is granted to personnel for the benefit of the Agency, its staff and clients. Every staff member has a responsibility to maintain and enhance the Agency's public image, and to use the Internet in a productive manner.

### Defining Acceptable Use

1. Agency-issued computers and business e-mail may be used for reasonable, non-excessive, and incidental personal use, so long as it occurs on personal time (lunch or other breaks). However, any employee who abuses the privilege of access to the Agency's voicemail, email, or the internet system will be subject to corrective action, up to and including termination of employment. If necessary, the Agency will also advise law enforcement officials of any illegal conduct.
2. The e-mail system may not be used to solicit or proselytize for commercial ventures, religious or political causes, outside organizations, or other non-work-related solicitations.
3. The e-mail system is not to be used to create any offensive or disruptive messages. Among those which are considered offensive, are any messages which contain sexual implications, discriminatory language, or any other comment that offensively addresses someone's age, gender, sexual orientation, religious or political beliefs, national origin, disability, socioeconomic class, and other protected classes.
4. The email system shall not be used to gossip, bully, harass, intimidate, blackmail, manipulate, or threaten violence against any personnel, client, partner, stakeholder, etc. Such behavior will not be tolerated, is considered gross misconduct, and will result in termination of employment.
5. The e-mail system shall not be used to send (upload) or receive (download) copyrighted materials, trade secrets, proprietary financial information, or similar materials without prior authorization.
6. Notwithstanding the Agency's right to retrieve and read any e-mail messages, such messages should be treated as confidential by other employees and accessed only by the intended recipient. Employees are not authorized to retrieve or read any e-mail messages that are not sent to them. Any exception to this policy must receive prior approval by the system administrator or Chief Executive Officers.
7. Employees shall not use a code, access a file, or retrieve any stored information, unless



authorized to do so. Employees should protect their own passwords, and should not attempt to gain access to another employee's messages without the latter's express permission. All computer pass codes must be known to the system administrator. No pass code may be used that is unknown to the Agency.

8. Personnel accessing the Internet through the Agency's network or to conduct work-related activities, are representing TI. All communications should be for professional and educational reasons. Employees are responsible for ensuring their Internet is used in an effective, ethical, and lawful manner. The use of Internet Relay Chat and video/audio chat channels may be used to conduct official Agency business, or to gain technical, educational, or professional advice. Databases may be accessed for information as needed. E-Mail may be used for business contacts.
9. The Internet should not be used for personal gain or advancement of individual views. Solicitation of non-Agency business or any use of the Internet for personal gain is strictly prohibited. Use of the Internet must not disrupt the operation of the Agency's network, the networks of other users, or hinder any business activity. It must not interfere with your productivity or ability to perform the functions of your job. The Agency Internet system may not be used to send (upload) or receive (download) violent, prejudicial, sexually provocative, or other inappropriate material.
10. Each employee is responsible for the content of all text, audio, or images they place or send over the Internet. Fraudulent, harassing, or obscene messages are prohibited. No abusive, profane, or offensive language will be transmitted online. All messages communicated on the Internet should have the employee's name attached. No messages will be transmitted under an assumed name. Users may not attempt to obscure the origin of any message. Information published on the Internet should not violate or infringe upon the rights of others.
11. Clients shall be closely monitored while using the Internet. The employee in charge will be responsible for the client's acceptable use of the Internet.

### Social Media Use

TI recognizes that social media is widely used and utilizes social media platforms to facilitate business initiatives. However, use of social media also presents certain risks and carries with it certain responsibilities. As such, we have established the following guidelines for appropriate employee use of social media. Managers and supervisors should contact Human Resources or the Executive Director for additional guidance in administering the policy.

1. When considering your activities on social media platforms, keep in mind that any of your conduct that adversely affects your job performance or the performance of your colleagues, or that adversely affects the Agency's clients or legitimate business interests may result in disciplinary action up to and including termination of employment.
2. Inappropriate postings that may include discriminatory remarks, slander, harassment, malicious gossip, obscenities and threats of violence or similar inappropriate or unlawful conduct will not be tolerated and may subject you to disciplinary action up to and including termination of employment or civil liability.



3. Always be fair and courteous to colleagues, clients, resource or birth families, professionals, or other people associated with the Agency, when utilizing social media. Work-related complaints are more easily resolved by speaking directly with your colleagues or by utilizing established problem-solving procedures.
4. Never represent yourself as a spokesperson for Therapeutic Interventions, and be clear about your position as an associate and that your views do not represent those of the Agency, its clients, or other business associates. It is strongly recommended to include a disclaimer, such as “The views, thoughts, and opinions on this site are my own.”

### Copyright Infringement

Personnel may not transmit copyrighted materials on the Internet belonging to entities other than TI. One copy of copyrighted material may be downloaded for your own personal use in research. Users are not permitted to copy, transfer, rename, add, or delete information or programs belonging to other users unless given express permission to do so by the owner. Failure to observe copyright or license agreements may result in disciplinary action from the Agency or legal action by the copyright owner.

### Third-Party Software

Personnel are not authorized to download or install any software without prior approval from the Regional Director, in order to prevent computer viruses from being transmitted through the system. All software downloaded or installed remains the property of the Agency.

### Violations

Violations of any guidelines listed above may result in disciplinary action up to and including termination. If necessary, the Agency will advise appropriate regulatory officials of any illegal violations.

Any personnel who discovers a violation of this policy shall notify the system administrator or Executive Director immediately. TI prohibits taking negative action against any associate for reporting a possible deviation from this policy or for cooperating in an investigation. Any associate who retaliates against another associate for reporting a possible deviation from this policy or for cooperating in an investigation will be subject to disciplinary action, up to and including termination of employment.

If you have questions or need further guidance concerning this policy, please contact your supervisor, Human Resources, or the Executive Director.



## 5. TIME AND ATTENDANCE

WORK SCHEDULES.....	65
ATTENDANCE POLICY.....	66
Absenteeism.....	67
Tardiness.....	67
Job Abandonment.....	67
Unscheduled Closings.....	68
TIME OFF .....	69
Annual Leave.....	69
Sick Leave.....	70
Bereavement.....	70
Agency Paid Holidays.....	71
Voting Leave.....	71
Jury Duty.....	72
Court Appearances.....	72
LEAVE ADMINISTRATION.....	73
Medical Leave.....	73
Military Leave.....	76





POLICY #: HR9017	TOPIC: <b>Work Schedules</b>	DATE:
COA CORE/PRACTICE STANDARD(S):		APPROVED BY:

**POLICY:**

The purpose of this policy is to define the work schedules of employees.

**Guidelines**

1. The Agency's standard workweek for base pay purposes begins on Monday at 12:00:00 a.m. and concludes on Sunday at 11:59:59 p.m.
2. The normal business hours of the Agency are 8:00 a.m. – 4:30 p.m., Monday through Friday.
3. Most non-exempt, full-time employees work a weekly schedule of 40 hours per week, consisting of five (5), 8-hour days, Monday through Friday, including one unpaid half-hour for lunch.
4. Work schedules will be coordinated under the supervision of the Regional Director, who will communicate expectations and notify employees of changes.
5. Units have the flexibility to offer flexible working arrangements.
6. Circumstances may arise in which a non-exempt employee is required to work overtime with little or no advance notice.
7. Both employment status and benefit eligibility are determined by the number of hours worked, the regularity of the work schedule, and the duration of the position. Please refer to Benefits Eligibility policy for additional details.
8. The Agency complies with all federal and state regulations regarding rest and meal periods. Employees should check with the supervisor regarding procedures and schedules for rest and meal periods. The Agency requests that employees accurately observe and record meal and rest periods. When an employee is unable to or prohibited from taking a rest or meal period, the supervisor should be notified in advance, when possible, or at the earliest opportunity.



POLICY #: HR9010	TOPIC: <b>Attendance Policy</b>	DATE:
COA CORE/PRACTICE STANDARD(S):		APPROVED BY:

**POLICY:**

It is vital to the Agency for all employees to have timely, regular, and reliable attendance. Absenteeism and tardiness negatively affect our ability to provide quality Agency services. The purpose of this policy is to establish the requirements for reporting absences, to provide guidelines for the handling of tardiness, early departures, and unscheduled absences, and to outline employees' responsibility to adhere to established work schedules to maintain operations. This policy applies to all employees.

**PROCEDURE:**

Overview

1. Each office must maintain regular office hours and ensure operations will be covered by authorized personnel during those times.
2. It is the responsibility of the Regional Director to communicate work schedules and to develop and document a call-in procedure. The call-in procedure defines when and whom an employee should call to report a delayed arrival or absence.
3. Time approvers are responsible for reviewing and approving time before each time approval deadline. It is the responsibility of the time approver to ensure the time submission is accurate. Any technical issues should be reported to Human Resources before the approval deadline.
4. Federal and state laws mandate accurate recordkeeping of hours worked by employees. Every employee of the Agency is required to enter attendance and absences accurately in the time tracking system, and must also notify the Agency of any unrecorded or inaccurate work hours, or involuntarily missed meal or break periods. Time worked should be entered into the system the Monday following the end of each pay period. Falsification of time records or recording time for another employee may result in discipline, up to and including termination of employment.
5. Immediate supervisors are responsible for reviewing and verifying attendance records to ensure the accuracy of the records and consistent application of Agency policy. These records will also be reviewed by Human Resources and the Executive Director, on occasion, to ensure the consistent application of Agency attendance policy.



## Absenteeism

Employees are expected to communicate with their supervisor, or other appointed contact person, when an unscheduled absence occurs. If you know ahead of your scheduled work shift that you will be absent from work, please provide reasonable advance notice to your supervisor. Employees may be required to provide documentation of any medical or non-medical reason for being absent more than two (2) consecutive workdays.

The Agency reserves the right to apply unused annual leave, sick time, or other paid time off to cover unscheduled absences. Additionally, pattern absences, repeated failure to provide timely notification, or failure to comply with the Sick Leave Policy may result in absences being counted as unscheduled absences. Excessive unscheduled, unapproved, or unpaid absences will result in disciplinary action, up to and including termination of employment. Absences resulting from approved leave, vacation, or legal requirements are exceptions to the policy.

## Tardiness

Tardiness is defined as failure to report to an assigned work area at the scheduled start time, including returning from lunch or other breaks. If you know ahead of your scheduled work shift that you will have a delayed arrival, please notify your supervisor or other appointed contact person as soon as reasonably possible.

In the event of extraordinary weather conditions, reasonable tardiness should be excused.

Excessive tardiness should be documented by the supervisor. Three (3) documented occurrences will result in a written warning to the employee and count as an unscheduled absence.

## Job Abandonment (No Call/No Show)

An employee who fails to report for work or call in with an acceptable reason for their absence, for a period of three (3) consecutive days, is considered to have abandoned their job and to have voluntarily resigned from the Agency.

It is the responsibility of the abandoning party to return the assigned Agency property in their possession. The Agency has the right to pursue legal action for property not returned and the abandoning party will also be liable for lost or damaged items belonging to the Agency.

The employee's final paycheck will be remitted at the time of the next scheduled payroll after abandonment, and any remaining annual leave balances will be withheld. The agency also has the right to withhold the final paycheck until Agency property has been returned and in operating condition. The Agency is not liable to payout for claims of hours worked or leave taken, but not recorded into the time tracking system at the time of abandonment. However, if all Agency property has been returned, and the supervisor can verify the hours worked, The Agency will honor a written, signed request for payment of hours worked. The written request must include specific dates and hours worked for consideration.



### Unscheduled Closings

The Agency may allow time off in a specific region or across the organization, or allow working from home, due to inclement weather, natural disaster, power outages, the closing of state offices due to unfavorable weather conditions, a public health emergency, etc. When this happens, Agency employees will be notified by their direct supervisor, or other officer of the Agency, either by written or verbal communication, with specific instructions and expectations. Employees will also be informed of an actual or anticipated return-to-work date. Time off under these circumstances will be considered holiday pay and will not count against an employee's annual leave or sick time balances.



POLICY #: HR9018	TOPIC: <b>Time Off Policy</b>	DATE:
COA CORE/PRACTICE STANDARD(S):		APPROVED BY:

**POLICY:**

Full-time employees are eligible for leave benefits and may take compensated annual and sick leave, with supervisory approval, beginning on the first day of the month following 30 full days of employment. Sick and annual leave begins to accrue when eligibility commences.

Annual and sick leave may be used in one (1) hour increments.

Leave can be advanced for employees who have been employed, full-time, for at least 6 months, with supervisory approval.

Employees are expected to submit requests for leave in the time tracking system. Requests for three (3) or more consecutive days should be submitted at least 4 weeks in advance to permit adjustment in the work schedule and ensure work responsibilities will be covered. All leave requests will be approved on a case-by-case basis.

An employee who exhausts their annual leave balance(s) may have their compensation adjusted as appropriate under state and federal law. Failure to provide proper notice or documentation, failure to get prior approval, or excessive unapproved absences can result in disciplinary action up to and including termination.

**PROCEDURE:**

Annual Leave

Full-time employees of Therapeutic Interventions accrue annual leave as follows:

	Accrual Rate	Total Hours Accrued Per Year <sup>1</sup>	Max Hours
30 days – 10 years	1 day or 8 hours, per month	96	136
10 – 15 years	1.5 days or 12 hours, per month	144	184
15+ years	1.75 days or 14 hours, per month	168	208

All employees are encouraged to use annual leave in the year it is accrued. However, unused annual leave will be rolled over to the next calendar year, at the beginning of the calendar year, up to 40 hours. The max rollover amount for any given year is 40 hours; any remaining accrued leave will be forfeited. When annual leave is approved and taken in advance, the employee’s annual leave will balance at a negative total. If termination of employment occurs and leave totals are negative, the monetary value of those advanced hours will be deducted from the employee’s final paycheck to bring the balance back to zero.

<sup>1</sup> Based on an employee who is full-time active throughout the entire calendar year.



If termination of employment occurs and a positive annual leave balance remains, those hours will be paid to the employee, up to 40 hours.

Throughout the year, the Agency goes through several deadlines, audits, and periodic monitor visits. These events may require the cooperation and assistance of all TI employees. Therefore, the Agency reserves the right to deny any annual leave request due to special circumstances or significant disruption to business operations. The Agency will work with an employee whose request has been denied to identify alternative options.

### Sick Leave

Full-time employees of Therapeutic Interventions accrue sick leave at a frequency of eight (8) hours per month starting on the first (1<sup>st</sup>) day of the month following 30 full days of employment. The sick leave balance may be carried over to the following year, however, only up to 45 days may be accrued and/or used in one 12-month calendar period. Sick leave balances will be capped at 45 days or 360 hours.

Employees are responsible for reviewing their available balances prior to requesting sick leave. Sick leave may be used in accordance with the procedures set forth below for absences due to the employee's own illness or injury, or:

1. For receiving medical care, treatment, diagnosis, or preventive medical care;
2. To care for a Family Member receiving medical care, treatment, diagnosis, or preventive medical care;
3. To care for a child whose school or place of care has been closed by order of a public official due to a public health emergency.

For the purposes of this policy, "Family Member" refers to immediate family defined as the spouse, child, parents, siblings, and grandparents of the employee. TI reserves the right to require a medical statement from a healthcare provider.

An employee who takes three (3) or more consecutive sick days must provide a statement from a medical provider that leave was medically necessary. TI also reserves the right to require a medical statement for frequent, non-consecutive sick days.

The employee is responsible for contacting their immediate supervisor, or other appointed contact person, prior to the beginning of the workday when requesting a sick leave day. The notice requirements for extended medical leave are outlined in the Family and Medical Leave policy below.

### Bereavement

Bereavement leave is available to employees who experience a loss in the family. This policy applies to employees who lose a spouse, child, parent, sibling or grandparent. Bereavement leave for other close relatives or foster children can be approved by the employee's supervisor on a case by case basis.

All bereavement leave requests must be approved by the employee's immediate supervisor. The time allotted for bereavement leave shall be no more than three (3) days and will not be



deducted from the employee's annual leave balance.

Two additional days of sick leave may be granted to provide a total of five (5) days absence.

### Agency Paid Holidays

Therapeutic Interventions offers the following paid holidays each year for regular full-time employees:

<b>Holiday</b>	<b>Day Observed</b>
New Year's Day	January 1
Martin Luther King Jr Day	Third Monday in January
President's Day	Third Monday in February
Good Friday	Friday preceding Easter
Memorial Day	Last Monday in May
Independence Day	July 4
Juneteenth	June 19
Labor Day	First Monday in September
Veterans Day	November 11
Thanksgiving Day	Fourth Thursday in November
Day After Thanksgiving	Fourth Friday in November
Christmas Eve	December 24
Christmas Day	December 25
New Year's Eve	December 31

Employees will receive an updated holiday schedule at the beginning of each calendar year.

Should any of the above holidays fall on a Saturday, the Agency will observe the holiday on the preceding Friday. Should any of the above holidays fall on a Sunday, the Agency will observe the holiday on the following Monday.

### Birthday

Full-time regular Agency employees can take their birthday as a paid time off. This time off may be taken the week of their birthday, rather than the actual day. Prior supervisory approval is required in both instances.

### Voting Leave

The Agency supports employees exercising their right and responsibility to vote in national, state, or municipal elections.

Employees are expected to vote during their non-working hours. In those situations, when an employee is unable to vote during non-working hours, and also works the regular scheduled hours, up to two (2) hours off with pay may be allowed to vote.



1. An employee must submit a time off request early enough to permit adjustment in the work schedule, no later than two (2) days prior to election day.
2. An employee may be required to show evidence of eligibility to vote, in the form of a current voter registration card, when requesting time off for this purpose.
3. An employee wishing to serve as judge, clerk, or official watcher, should utilize their annual leave balance.

### Jury Duty

TI supports employees who are called to meet their civic obligations to serve as jurors.

Employees will be paid their regular salary for time spent on actual jury duty. Employees must present proof of jury duty notification. In the event an employee reports for jury duty but is not selected to serve on that day, the employee is expected to report back to work and resume their employment duties until the next scheduled jury selection. The employee must notify the immediate supervisor early enough to permit adjustment in the work schedule and reassign caseloads or work responsibilities where necessary.

### Court Appearances

The Agency will allow time off for employees who are obligated to make court appearances. Employees may use accrued annual leave to receive pay for time lost from work or may use unpaid time to appear in court.

- If an employee is subpoenaed to make a court appearance for a matter unrelated to their employment, the employee is expected to use accrued annual leave and/or unpaid time off.
- If an employee is subpoenaed to make a court appearance on the Agency's behalf, the employee is paid their regular pay.
- If an employee is subpoenaed to make a court appearance on behalf of another Agency employee, the subpoenaed employee is expected to use accrued annual leave and/or unpaid time off.

The employee being subpoenaed is responsible for notifying their supervisor immediately after receiving notice to appear at court during scheduled work hours. A supervisor may request a copy of this notice for recordkeeping.

### Leave Donation

Therapeutic Interventions does not offer a leave donation or leave sharing program. An employee who exhausts their annual paid leave and requires additional time off should discuss their options with the direct supervisor, Human Resources, or the Executive Director.





POLICY #: HR9013	TOPIC: <b>Leave Administration</b>	DATE:
COA CORE/PRACTICE STANDARD(S):		APPROVED BY:

**POLICY:**

The purpose of this policy is to provide employees with a basic understanding of their rights and obligations under the Family Medical Leave Act (FMLA), Families First Coronavirus Response Act (FFRCA), and Uniformed Services Employment and Re-employment Rights Act (USERRA).

**PROCEDURE:**

Medical Leave of Absence

*Overview*

Therapeutic Interventions does not currently meet the headcount requirements of the Family and Medical Leave Act (FMLA) or Tennessee’s Maternity Leave Act.

All Family and Medical Leave is subject to prior written approval by the Agency and will be evaluated on a case by case basis.

An employee must submit the leave request in the time tracking system and supporting documentation from a medical provider prior to beginning medical leave.

The employee will not accrue additional annual or sick leave while on extended medical leave.

Employees who have worked as full-time employees for at least 12 months may be eligible to take extended family and medical leave subject to approval and the guidelines outlined in this policy. Leave for employees who have worked for the Agency less than 12 months will be approved on a case by case basis.

**A. Leave Entitlement**

*General Guidelines*

TI may grant an eligible employee up to a total of 12 work weeks of unpaid leave during any 12-month period for one or more of the following reasons:

- The birth of a child and to care for the newborn child within one year of birth;
- The placement of a child for adoption or foster care and to care for the newly placed child within one year of placement;



- To care for the employee’s spouse, child, or parent who has a serious health condition;
- A serious health condition that makes the employee unable to perform the essential functions of the job;
- Any qualifying exigency or serious illness or injury arising out of the fact that the employee’s spouse, child, or parent is a covered military member on “covered active duty;”

Spouses employed by TI are jointly entitled to a combined total of 12 work weeks of family leave for the birth and care of the newborn child, for placement of a child for adoption or foster care, and to care for a parent or child who has a serious health condition.

Leave for birth and care, or placement for adoption or foster care must conclude within 12 months of the birth or placement.

## **B. Intermittent Leave**

Under some circumstances, employees may take leave intermittently — which means taking the 12-week leave period in blocks of time, versus consecutively, or by reducing their normal weekly or daily work schedule.

1. Leave may be taken intermittently whenever medically necessary to care for a seriously ill spouse, child or parent, or because the employee is seriously ill and unable to work. Use of intermittent leave is subject to Agency approval.
2. TI and the employee may choose to have the employee use accrued sick or annual leave) to cover some or all of the leave.

## **C. Defining A Serious Health Condition**

For the purposes of this policy, "Serious health condition" is defined as an illness, injury, impairment, or physical or mental condition that involves either:

- Any period of incapacity or treatment connected with inpatient care (i.e., an overnight stay) in a hospital, hospice, or residential medical-care facility, and any period of incapacity or subsequent treatment in connection with such inpatient care; or
- Continuing treatment by a health care provider which includes any period of incapacity (i.e., inability to work, attend school or perform other regular daily activities) due to:
  1. A health condition (including treatment for, or recovery from) lasting more than three consecutive days, and any subsequent treatment or period of incapacity relating to the same condition. That also includes:
    - Treatment two or more times by or under the supervision of a health care provider; or
    - One treatment by a health care provider with a continuing regimen of treatment; or



2. Pregnancy or prenatal care. A visit to the health care provider is not necessary for each absence; or
3. A chronic serious health condition which continues over an extended period of time, requires periodic visits to a health care provider, and may involve occasional episodes of incapacity (e.g., asthma, diabetes). A visit to a health care provider is not necessary for each absence; or
4. A permanent or long-term condition for which treatment may not be effective (e.g. Alzheimer's, a severe stroke, terminal cancer). Only supervision by a health care provider is required, rather than active treatment; or
5. Any absences to receive multiple treatments for restorative surgery or for a condition which would likely result in a period of incapacity of more than three (3) days if not treated (e.g. chemotherapy or radiation treatments for cancer).

For the purposes of this policy, "Health care provider" is defined as:

- Doctors of medicine or osteopathy authorized to practice medicine or surgery by the State in which the doctors practice; or
- Podiatrists, dentists, clinical psychologists, optometrists and chiropractors (limited to manual manipulation of the spine to correct a sublimation as demonstrated by X-ray to exist) authorized to practice, and performing within the scope of their practice, under state law; or
- Nurse practitioners, nurse-midwives and clinical social workers authorized to practice, and performing within the scope of their practice, as defined under state law; or
- Any health care provider recognized by TII or the TII's group health plan benefits manager.

#### **D. Maintenance of Health Benefits**

TI will maintain group health insurance coverage for an employee on leave whenever such insurance is provided before the leave was taken and on the same terms as if the employee had continued to work. If applicable, arrangements will need to be made for employees to pay their share of health insurance premiums while on leave. In some instances, TII may recover premiums it paid to maintain health coverage for an employee who fails to return to work from leave.

#### **E. Return to Work**

Upon return from leave, an employee may be restored to the employee's original job, or to an equivalent job with equivalent pay, benefits, and other terms and conditions of employment if the employee received prior written approval from TI.

In addition, an employee's use of leave cannot result in the loss of any employment benefit that the employee earned or was entitled to before using leave, nor be counted against the employee under a "no fault" attendance policy.



Employees will need to provide a statement from a medical provider stating the leave was medically necessary and the ability to return to work and resume job responsibilities.

Under circumstances where restoration to full employment will cause substantial and grievous economic injury to its operations, TI may refuse to return an employee after using leave during which health coverage was maintained. In order to do so, TI must:

- Notify the employee as soon as TI decides it will deny job restoration, and document the reasons for this decision;
- Offer the employee a reasonable opportunity to return to work from leave after giving this notice; and
- Make a final determination as to whether reinstatement will be denied at the end of the leave period if the employee then requests restoration.

## **F. Notice and Certification**

Employees seeking to use leave are required to provide a 30-day advance written notice of the need to take leave when the need is foreseeable and such notice is practicable. The notice should include the date the leave is to begin and when the employee plans to return to work.

TI may also require employees to provide:

- Medical certification supporting the need for leave due to a serious health condition affecting the employee or the employee's spouse, child or parent;
- Second or third medical opinions (at TI's expense) and periodic recertification; and
- Periodic reports to be specified on a case by case basis during leave regarding the employee's status and intent to return to work.

When intermittent leave is needed to care for an immediate family member or the employee's own illness, and is for planned medical treatment, the employee must try to schedule treatment so as not to unreasonably disrupt the Agency's business operations.

## **G. Other Provisions**

1. The substitution of paid leave time for unpaid leave time does not extend the 12-week leave period. Also, the employee's family medical leave may run concurrently with other types of leave.

### Military Leave

In accordance with guidelines established by the Uniformed Services Employment and Reemployment Rights Act (USERRA) regarding military leave, Therapeutic Interventions follows the policy as outlined below:



The Uniformed Services Employment and Reemployment Rights Act of 1994 is a federal law intended to ensure that persons who serve or have served in the Armed Forces, Reserves, National Guard or other "uniformed services:"

1. are not disadvantaged in their civilian careers because of their service;
2. are promptly reemployed in their civilian jobs upon their return from duty; and
3. are not discriminated against in employment based on past, present or future military service.

## **A. Requesting Military Leave**

When an employee is called to military service, USERRA requires the employee in the uniformed services to give advance written or verbal notice of the service to their employer, unless such notice is precluded by military necessity. The employee should submit a Leave of Absence Request Form to the direct supervisor when notified of an impending call to service as soon as possible and provide documentation.

## **B. Duration of Leave**

### **1. Extended Military Leave**

Employees who must be absent from work due to military duty for a time period that exceeds ten (10) working days will be placed on an unpaid military leave of absence for the time period consistent with military orders.

### **2. Temporary (Two-Week) Military Leave**

In addition to the rights and benefits provided to employees taking extended military leave, an employee who must be absent from their job for a period of not more than ten (10) working days each year in order to participate in temporary military duty is entitled to as many as ten (10) days of unpaid military leave.

### **3. Benefits During Military Leave**

An employee on military leave may elect to continue their health plan coverage and is required to pay only the employee's portion of the insurance premium when in the service for 30 days or less. Thereafter, the employee may elect to continue healthcare coverage as provided under COBRA. However, if coverage is terminated at the employee's option, Therapeutic Interventions may not impose a waiting period for benefit reinstatement upon return to employment. For more specific information regarding the status of Health Plan coverage, Group Term Life/AD&D and other benefits during military leave, contact Human Resources.

An employee on military leave may opt to, but is not required to, use sick/vacation during the time of their military assignment. This is an exception to our other leave policies which requires an employee to exhaust all paid time off (PTO) prior to going into an unpaid status. PTO is not accrued while the employee is on military leave.

Therapeutic Interventions will activate the returning veteran's benefits based upon the length of service they would have had if they had remained on the job.



#### 4.. Returning to Work After Military Duty

To be eligible for protection under USERRA, the employee must report back to work or apply for re-employment within the following guidelines:

- a. If the employee served fewer than 31 days or was away from Therapeutic Interventions for other qualified reasons, the employee must return to work the next regularly scheduled workday.
- b. If the employee served more than thirty (30) days, but fewer than 181 days, the employee must notify their supervisor of their intention to return to work within fourteen (14) days after completion of service.
- c. If the employee served more than 180 days, the employee must notify their supervisor of their intention to return to work within 90 days after completion of service.
- d. Upon notification of intent to return to work, the employee must provide military discharge documentation to the direct supervisor that establishes timeliness of application for re-employment and length and character of the employee's military service.

An employee returning from military leave will retain all of the benefits the employee had at the beginning of the military leave, plus any benefits the employee would have obtained with continuous employment. This does not include restoration of any leave balances that were used or would have accrued while on active duty. In addition, time spent on active duty will be counted towards eligibility for FMLA once the employee has returned to work.

Questions regarding re-employment of employees returning from military leave should be directed to Human Resources.



## 6. COMPENSATION

PAYROLL POLICIES.....	80
Pay Schedule.....	80
Pay Deductions.....	80
Pay Errors.....	81
Pay Advances.....	82
Pay Differentials.....	82
Overtime Pay.....	82
Flex Time.....	82
Weekends and Holidays.....	83
Travel Time Pay.....	83
Expense Reimbursements.....	84
DIRECT DEPOSIT.....	87



POLICY #: HR9021	TOPIC: <b>Payroll Policies</b>	DATE:
COA CORE/PRACTICE STANDARD(S):		APPROVED BY:

**POLICY:**

An employee’s compensation depends on a wide range of factors, including, but not limited to, market survey data, individual performance and productivity, business profits, and market forces.

TI is committed to fair and equitable pay. The Agency is also committed to ensuring employees receive timely and accurate payments, and in accordance with federal, state, and local laws.

Employees are responsible for accurately reporting hours worked and time off in the time tracking system and should notify a supervisor immediately when a pay issue exists.

**PROCEDURE:**

Pay Schedule

1. The standard pay cycle is bi-weekly for all Agency employees.
2. Each pay period is two weeks in length, beginning on a Monday and ending on a Sunday. Employees are paid two (2) weeks in arrears, on the second Friday following the end of each pay period. Agency employees receive a payroll schedule at the time of onboarding and at the onset of each new payroll calendar year. The payroll schedule will list the payroll period start and end dates along with the corresponding pay date.
3. An employee who is newly hired, or is returning from an extended leave, and begins working in the middle of a pay period will receive a prorated first check in timing with the payroll schedule.
4. Should any pay date fall on a holiday, employees will be paid on the preceding workday.

Pay Deductions

*Involuntary Deductions*

1. **Mandatory Payroll Taxes**

The Agency is required by federal and state law to make certain deductions from an employee’s paycheck. This includes federal income tax, state income and unemployment tax, and FICA contributions (Social Security and Medicare), as well as any other deduction required under state or federal law.





Each category of mandatory tax deductions has its own withholding requirements. The amount of an employee's tax deductions will depend on individual earnings, filing status, and the number of exemptions.

The Agency will not assume the liability of administering tax advice and strongly encourages employees to seek the services of a tax professional, if required.

## 2. Wage Garnishments

Anything an employee does in their personal affairs which involves the Agency in legal proceedings initiated by private creditors and/or public regulatory entities is looked upon as a serious matter.

If the Agency receives a court order to withhold wages to repay a debt, such as child support, alimony, restitution, fines, federal student loans, or debt collection, the Agency is required by law to deduct the necessary payments. Garnishments are deducted post-tax and will not exceed twenty-five percent (25%) of an employee's take home pay.

Every effort will be made to notify the employee of a court ordered wage garnishment, in writing, including information on disputing the garnishment in court.

Court orders for wage garnishment must be directed to the Human Resources office immediately for processing to avoid legal penalties for non-compliance.

### *Voluntary Deductions*

Employees may also authorize voluntary deductions from their wages. The following list provides examples of voluntary payroll deductions and is not exhaustive:

#### **Pre-Tax**

- Health benefits plan premiums
- Group Life Insurance
- 401K Retirement Benefits
- Health Savings Account (HSA) contributions
- Short-term Disability (STD) plans
- Repayment of advanced wages or Agency loan

#### **Post-Tax**

- Tuition
- Charitable donations

### Pay Errors

The Agency will endeavor to ensure all staff receive accurate payments through payroll. An employee who, at any time, believes their paycheck is inaccurate should contact Human Resources, who will be able to clarify, investigate, correct and/or resolve.



## Pay Advances

TI strongly discourages employee requests for payroll advances or loans.

In the event you wish to request an advance of your wages or a loan for emergency reasons, please notify Human Resources. Requests must be reviewed and approved by the Executive Director before a request is processed.

Before the Agency will agree to advance wages or loan money, an employee must review and sign a payroll deduction authorization form, which acknowledges the date and the amount of the advance or loan, sets forth the terms for repayment including any interest, authorizes repayment via payroll deductions, and promises full repayment of the advance or loan upon termination of employment including withholding some or all of the remaining balance from the final paycheck.

## Pay Differentials

### *Overtime Pay*

On occasion, the Agency may require an employee to work overtime. We will attempt to give as much notice as possible in this instance. However, advance notice may not always be possible. Failure to work overtime when requested or working unauthorized overtime may result in disciplinary action, up to and including termination of employment.

A non-exempt, full time or part-time employee may qualify for overtime pay. Exempt employees are not eligible for overtime pay. All overtime must be approved and documented in advance by the supervisor, prior to working overtime.

In the event of an emergency or crisis, an employee is authorized to work overtime without prior approval but must immediately notify the supervisor when overtime is required. Whenever possible and in non-emergency situations, an employee's schedule should be coordinated to avoid working overtime. Employees should work with the supervisor to manage weekly schedules to avoid overtime and ensure that all necessary job responsibilities are being met.

Overtime will be paid for any hours worked over forty (40) hours in a single workweek, at a rate of one and one-half (1.5x) an employee's base rate of pay. Holidays, annual leave days, sick leave days, and birthdays do not count as time worked for computing overtime.

### *Flex Time Pay*

When possible and with approval from the supervisor, exempt employees who are not eligible for overtime pay, can adjust their regular work hours, or "flex" time, when required to work overtime. This is not always an option and all necessary work must be completed and deadlines must be met.

Flex time must be taken in the same workweek that the additional hours are worked. If you know that you will be working overtime, please work with your supervisor to determine the best time to flex hours and the total hours to be flexed. The supervisor has the right to deny flex time



where an employee has not completed their necessary work or if the schedule does not permit. Meetings and deadlines will not be rescheduled to allow for flex time.

### *Weekends and Holidays*

#### 1. Weekends

A non-exempt employee who is required to work on the weekend due to an emergency or crisis is eligible for overtime. Weekend hours are “hours worked” for the purposes of calculating overtime.

#### 2. Holidays

As a general practice, time off for a Agency-paid holiday will not be rescheduled. However, the Agency recognizes emergencies may arise and make working on a holiday necessary. On the rare occasion an employee is required to work on a Agency-paid holiday, the employee will receive premium pay, to be calculated as double (2x) their base rate of pay.

Another option for consideration is allowing an hourly staff member to take a full workday off on a different day within the same week.

Approval for either option must be granted by the employee’s immediate supervisor and should be noted in the time tracking system.

### *Travel Time Pay*

Employees who are required to travel while conducting their work are due compensable time in the following way:

1. When reporting to the workplace, then traveling to another site to work for the day, travel time to the assigned worksite will be paid.
2. When required to report to a site other than the regular worksite, and going directly to that site without first going to the regular worksite, the Agency will pay the employee travel time for any time exceeding the employee’s normal commute time to the regular worksite.
3. Time spent by a non-exempt employee in travel as part of their principal activity, such as frequent travel from worksite to worksite during the workday, is work time and is compensable.
4. Employees required to travel to a distant worksite are paid travel time in addition to time worked.
5. Travel that keeps a non-exempt employee away from home overnight qualifies as work time if it takes place during the non-exempt employee's regularly scheduled workday. This travel time qualifies as work time even if it occurs during the employee's corresponding working hours on nonworking days. Time spent traveling outside of the employee's regular working hours is not considered work time and is not compensable.



6. Regular meal period times are not considered compensable time while traveling.

Travel hours are “hours worked” for the purposes of calculating overtime.

### Expense Reimbursement

The purpose of this policy is to identify the out-of-pocket employee expenses for which the company will reimburse. Expenses must be reasonable and necessary and require prior approval in most cases.

#### **1. Travel Expenses**

Travel expenses are the reasonable and necessary incidental expenses incurred by employees when traveling on approved Agency business trips. Travel is limited to business activities for which other means of communication is inadequate and for which prior approval of the employee’s supervisor has been received.

The Agency pays the actual amounts incurred for appropriate expenses when employees are on travel assignments. All travel expenses require prior written approval from the employee’s supervisor and Executive Director. All hotels, rental cars and airline travel must be booked through the corporate office. Prior written approval from the corporate office is required for reimbursement of meal & incidental expenses. Examples of typical expenses include the following:

- Mileage
- Lodging
- Car rental, bus, taxi, parking
- Business supplies and services
- Other expenses necessary to achieve the business purposes

##### **a. *Advances***

The Agency does not provide per diems for business travel. Employees are expected to use personal credit cards and/or their own cash and submit their approved expenses on the standard Employee Reimbursement Form. Employees may also use company credit cards with prior approval for travel expenses.

##### **b. *Hotels & Lodging***

All hotel reservations will be booked through the corporate office and paid for with a company card after receiving written approval from the supervisor and Executive Director. Employees must get prior written approval from the direct supervisor and Executive Director for all hotel accommodation requests. Neither in-room movies nor refreshment bars are approved Agency travel expenses.



**c. *Airline and Rental Car Reservations***

Airline travel and rental cars must be approved by the supervisor and the Executive Director. All travel reservations must be made by the corporate office with written approval from the supervisor and Executive Director. Employees are to use rental firms having existing relationships with the Agency and, where feasible, have negotiated discounts rates. If reasonable transportation is available, an employee is expected to use it.

**d. *Travel Insurance***

The Company does not pay for personal travel insurance for employees.

**e. *Personal Vehicles***

All employees using their own vehicle for business purposes will be reimbursed for vehicle use at the rate mandated by the state of Tennessee. Mileage is reimbursed on a monthly basis must be submitted via the mileage portal in accordance with the reporting schedule established by the corporate office. The Executive Director must authorize any deviation from this policy. Inquiries about mileage reimbursement should be directed to the direct supervisor or the corporate office administrator.

**f. *Employee Reporting***

Employees are to report non-mileage approved expenses on the standard Employee Reimbursement Form and must include a description of the expense, its business purpose, date, place, and the participants, as well as receipts.

**2. *Business Expenses***

Business expenses are the reasonable and necessary non-travel expenses incurred by employees for a legitimate business purpose that is not covered by normal Agency procurement processes. All business expenses must be approved in writing by the direct supervisor and the Executive Director.

**a. *Business Meetings (Company-Sponsored Events and Meetings)***

The Agency pays for expenses necessary to achieve a legitimate business objective when meetings are held with clients, birth families, resource families, or other Agency employees. The most senior Agency employee present will pay for and report all expenses.

**b. *Technical and Training Seminars***

The Agency pays for expenses associated with attendance at classes and seminars that enhance job-related skills. Prior approval must be obtained by the employee's direct supervisor and Executive Director.



**c. *Gifts***

Employees may present gifts only under exceptional circumstances and with prior approval of the Executive Director. The budget for gifts must not exceed the amount approved by the Executive Director.

**d. *Other Expenses***

The Company will pay for pre-approved postage, telephone expenses, and home office use (when telework is mandated) required for legitimate business objectives.

**e. *Employee Reporting***

Employees are to report their approved expenses on the standard Employee Reimbursement Form and must include a description of the expense, its business purpose, date, place, and the participants, as well as receipts.



POLICY #: HR9022	TOPIC: <b>Direct Deposit</b>	DATE:
COA CORE/PRACTICE STANDARD(S):		APPROVED BY:

**POLICY:**

This policy provides guidance to employees regarding direct deposits, which allows all payments from Therapeutic Interventions to be deposited directly into your checking or savings account.

**PROCEDURE:**

Direct deposit is the electronic transfer of funds from the Agency to an employee’s checking or savings account at their participating financial institution. It is a service to Agency employees.

1. Agency employees are required to be paid by direct deposit.
2. Employees are expected to enroll in direct deposit during their onboarding and prior to receiving their first paycheck, and it is the responsibility of each employee to notify the Agency of direct deposit changes through Paylocity.
3. Direct deposit can be set up by going to PAYLOCITY – PAY – DIRECT DEPOSIT ACCOUNTS. To establish direct deposit, your bank’s routing number and your specific bank account number are required.
4. If an employee’s bank account information is not entered correctly, or has not been updated after a change, the net pay will be issued by payroll check and sent to the employee’s work address.
5. Employees may access their electronic pay stubs in Paylocity via the web or the app.



POLICY #:	TOPIC: <b>Profit Sharing and Staff Bonuses Policy</b>	DATE: April 28, 2021
COA CORE/PRACTICE STANDARD(S):		APPROVED BY: Board of Directors

**POLICY:**

Therapeutic Interventions has developed the following bonus program to recognize and reward staff performance after a successful fiscal year. All bonuses are discretionary and will depend on the Agency’s financial health and the employee’s eligibility.

To be eligible for a bonus from the agency, an employee:

1. Must be employed in a full time, permanent position with the Agency;
2. Must have benefits eligibility with the Agency<sup>1</sup>;
3. Must be in good standing with the Agency;
4. Must be an active employee on the last day of the year.

Only bonuses that have been promised in writing will be considered valid, however, nothing in this policy shall be construed to guarantee a bonus award for any employee of the Agency.

**PROCEDURE:**

*Discretionary Performance Bonus*

Direct supervisors have the discretion to award an employee for exceptional performance and/or for working on a special project with temporary duties beyond their normal scope of responsibility. The amount of the bonus will be determined by the direct supervisor and approved by the Executive Director. The employee will receive written notice of the bonus amount and the length of the assignment before work begins on an assigned project.

The bonus will be awarded as additional pay and will be issued on the employee’s payroll check.

*Profit Sharing Bonus*

The profit-sharing bonus plan awards employees a percentage of the Agency’s profits after a successful fiscal year. The percentage of earnings awarded, how the earnings will be distributed amongst eligible staff, and when the earnings will be distributed are predetermined by the board of directors and will be communicated by the Executive Director to all employees within the first quarter of a given fiscal year.

The Board of Directors reserves the right to modify or terminate the profit-sharing plan at any time, and every effort will be made to notify employees when such a decision has been made.  
(continued on next page)

<sup>1</sup> Please refer to Benefits Eligibility policy





Profit-sharing bonuses will be processed by Human Resources according to established guidelines. When earnings are distributed as bonus payments through payroll, the payment will be taxed at the flat Internal Revenue Service (IRS) rate, plus applicable state rates.



**7. BENEFITS**

ELIGIBILITY.....91

    Guidelines.....91

    Programs .....92

WORKERS' COMPENSATION.....93



POLICY #: HR9008	TOPIC: <b>Benefits Eligibility</b>	DATE:
COA CORE/PRACTICE STANDARD(S):		APPROVED BY:

**POLICY:**

Full-time employees become eligible for employment benefits – such as health insurance, sick leave, and annual leave – on the first (1<sup>st</sup>) day of the month following 30 full days of employment.

Depending on your position and job classification, you may be eligible for a variety of benefits offered to employees of the Agency. Details on benefits eligibility and the benefits offered such as medical and other insurance, Employee Assistance Program, and many other benefits are summarized in the following pages.

The Agency will contribute up to \$240 per month toward the expense of any insurance benefits chosen by the employee. The employee is responsible for any cost for enrolled benefits exceeding \$240 per month. This cost will be deducted from the employee’s paycheck.

Questions about specific plan details may be directed to Human Resources or other designated contact person, or to the provider directly.

**PROCEDURE:**

Guidelines

*Regular Full-time Employees*

A regular full-time employee is an employee who has been employed at least 30 days and is regularly scheduled to work 40 hours per week. Unless stated otherwise, for the purposes of benefits eligibility, regular full-time employees who work at least 30 hours a week, are eligible for all the benefits provided to employees of TI. This includes annual leave, holiday pay, health insurance, and other benefits coverages.

*Regular Part-time Employees*

Part-time employees are not eligible for Agency benefits unless specified otherwise in this policy manual or in the benefit plan summaries.

*Temporary Employees*

Temporary employees are hired for a specific period or specific work project. The Agency reserves the right to extend the duration of temporary employment where necessary. Temporary employees are not eligible for employee benefits unless specified otherwise in this policy manual or in the benefit plan summaries.



## Dependents

Dependents of employees may be eligible for medical and dental benefits and other Agency benefits.

Employees must inform the Agency within thirty-one (31) days of any change in dependent status, including a qualifying life event, which may affect their eligibility. Appropriate documentation proving dependent eligibility must be submitted to Human Resources.

For the purposes of determining eligibility for Agency benefits, a “dependent” typically is defined as follows:

- Spouse (if not legally separated)
- Registered same-gender domestic partner
- Children to age 26 (natural children, stepchildren, legally adopted children, children for whom the employee is the legal guardian, children placed with the employee for adoption, or children of the employee’s registered domestic partner who live with and depend on the employee for support in a regular parent-child relationship)
- Unmarried children for whom the employee is legally responsible to provide health coverage, under the terms of a Qualified Medical Child Support Order (QMCSO)
- Unmarried child over 26 if the child 1) depends on the employee for primary financial support and maintenance due to a physical or mental disability, 2) is incapable of self-support, and/or 3) was disabled before reaching age 19.

## Benefit Programs

Therapeutic Interventions offers the following health benefits for eligible employees, unless noted otherwise:

Benefit	Provider	Plan Details
Medical Insurance	<i>Blue Cross Blue Shield of Tennessee</i>	The Agency offers multiple options, including a PPO, HMO, and HDHP. See the Benefits Summary document for plan details.
Dental Insurance	<i>Principal</i>	The Agency offers a PPO and HMO option. See Benefits Summary document for plan details.
Vision Insurance	<i>Principal</i>	See Benefits Summary document for plan details.
Group Life Insurance	<i>Transamerica</i>	Provided by default to all eligible employees. \$30K benefit for non-management; \$50K benefit for management. Employee is required to inform provider of intended beneficiary.
Supplemental Term Life Insurance	<i>Illinois Mutual</i>	Employee is required to inform provider of intended beneficiary. Refer to the Benefits Plan for details.
Short-Term Disability	<i>Principal</i>	
Accident, Cancer & Hospital Insurance	<i>Transamerica</i> <i>Transamerica</i>	
Telemedicine	<i>Freshbenies/Teladoc</i>	Free of charge for all eligible employees and qualifying dependents. See plan handouts for details or call helplines directly.
Employee Assistance Program (EAP)	<i>McLaughlin-Young Group</i>	
Health Saving Account (HSA)	<i>Medsurety</i>	Available to employees enrolled in HDHP
Retirement (401K)	<i>American Funds</i>	Up to 3% match with 3-year vesting period



POLICY #: HR9012	TOPIC: <b>Workers' Compensation</b>	DATE:
COA CORE/PRACTICE STANDARD(S):		APPROVED BY:

**POLICY:**

Therapeutic Interventions will provide compensation for lost wages when an employee is found to have suffered a compensable injury or illness which arises out of and in the course of employment. Workers' Compensation benefits are governed by state law and the Agency will administer this policy in accordance with state law.

**PROCEDURE:**

In accordance with state law, the following workers' compensation guidelines apply:

1. An employee who is injured on the job, no matter how slight, is to report the incident immediately to a direct supervisor. Consistent with applicable state law, failure to report an injury within a reasonable time could jeopardize an employee's claim for benefits.
2. If an injury or illness is severe, immediate medical care should be sought at a local Emergency Room.
3. An employee who qualifies for workers' compensation will receive partial wage replacement at a rate of 66 2/3% (or 66.67 percent), beginning on the 8<sup>th</sup> day of non-work due to injury or illness which has been ordered by an authorized physician, unless lost time is 14 days or more, at which time the first seven (7) days will be compensated retroactively.
4. Coverage for medical treatment and expenses, occupational disability leave, and rehabilitation services related to a workplace injury or illness will be provided under this policy. Expenses will be paid directly by the Agency, or will be reimbursed if the expenses were paid by the employee.
5. An employee may, but is not required to, use any accrued sick leave, vacation or personal holiday to supplement Workers' Compensation payments. Annual leave benefits do not accrue when out on a medical or disability leave related to Workers' compensation claim.
6. If an injury or illness is the result of an on-the-job accident, an accident report must be completed.
7. A medical release is required from a treating physician before an employee can return to work.
8. The Agency prohibits retaliation against any employee who seeks Workers' Compensation benefits in good faith.



## **8. PERFORMANCE MANAGEMENT**

DISCIPLINARY PROCESS.....	95
PERFORMANCE EVALUATIONS .....	98
BACKGROUND CHECKS.....	102



POLICY #: HR9053	TOPIC: <b>Disciplinary Process</b>	DATE:
COA CORE/PRACTICE STANDARD(S):		APPROVED BY:

**POLICY:**

Therapeutic Interventions strives to promote and maintain a supportive and nurturing working environment for its employees. However, the Agency understands additional guidance is sometimes required, and in some circumstances disciplinary action may be necessary.

This policy is not intended to limit the Agency’s right to discipline or discharge employees for any reason permitted by law, and the Agency retains the right to terminate an employee on an “at-will” basis.

Violation of TI policies and/or procedures may result in disciplinary action including, but not limited to, demotion, suspension, or termination of employment. The Agency encourages a system of progressive corrective action depending on the type of prohibited conduct. However, the Agency is not required to engage in progressive corrective action and may discipline or terminate an employee where they violate the rules of conduct, or where the quality or value of the employee’s work fails to meet expectations at any time, or for any other reason not prohibited by law. Any attempt at progressive corrective action does not imply that an employee is anything other than employed on an “at will” basis.

In choosing to implement this policy, the supervisor will ensure clear and direct communications with the direct report, and this policy must be applied consistently across the Agency.

**PROCEDURE:**

Progressive Corrective Action

In appropriate circumstances, management will employ progressive corrective action to address a violation of Agency policy and/or procedure. The Agency is not obligated to follow any disciplinary or grievance procedure and, depending on the circumstances, an employee may be disciplined or terminated without any prior warning or procedure. The Agency retains the discretion to address each situation on a case-by-case basis, and may also utilize the counseling or mediation services of a third-party entity, or other appropriate services, to facilitate corrective action.

The process for progressive corrective action can include:

Step 1 – Verbal Warning

Not a formal written warning, however, the supervisor will notify an employee about a violation of Agency policy, unsatisfactory work performance, or other behavior that challenges standing at the Agency, and document the notification occurred. This will not be included in the employee’s personnel file unless it progresses to the next stage in the corrective action process. In no way is an employee entitled to a verbal warning, and the supervisor has the discretion to



override this step in the corrective action process. Verbal warning may be the first, the last, or the only step required before employment termination, or other adverse employment decision, depending on the severity of non-performance or precipitating event

#### Step 2 – Written Warning(s)

A supervisor will document and provide a detailed, formal written warning to an employee who violates Agency policy, delivers an unsatisfactory work performance, or other behavior that challenges standing at the Agency. A written warning may or may not include a performance improvement plan (PIP), depending on the offense, and may or may not involve a repeat offense.

An employee who receives more than two (2) written warnings, for repeat or non-repeat offenses, will progress to Step 3 in the corrective action process. The supervisor has the discretion to override this step in the corrective action process and proceed to the next or final step.

#### Step 3 – Final Warning (with Final PIP)

A supervisor will provide a final written warning, with a performance improvement plan, when it is apparent an employee's unsatisfactory performance, conduct, or other offense will lead to termination of employment, or other adverse employment decision, and significant improvements have not been made in performance and/or conduct.

#### Step 4 – Determination on Employment

At this step, the supervisor will make an employment decision based on an employee's conduct, unsatisfactory work performance, or other behavior which has compromised standing at the Agency. Demotion, suspension, or termination of employment are possible at this step.

The supervisor is responsible for notifying both the Executive Director and Human Resources of an adverse employment decision. The supervisor will also make every effort possible to allow an employee to respond to disciplinary action taken. The employee will be formally notified of the supervisor's employment decision, which will be communicated in the presence of the supervisor and Human Resources Director.

#### Defining Misconduct and Other Offenses

Understand that while the Agency is concerned with consistent enforcement of our policies, the following list of offenses is not exhaustive or all-inclusive. This list is only intended to provide an example of offenses warranting disciplinary action.

The Agency fully reserves the right to discipline employees for misconduct that is not specifically referenced in this list, up to and including termination of employment.

- a. Violations of Department of Children Services, Private Provider or Agency rules, regulations, policies, or practices, to be understood as willful non-compliance occurring deliberately or due to neglect.





- b. Unapproved or excessive absences, including failure to give proper notice of absences
- c. Consistent tardiness, including failure to give proper notice of late arrival
- d. Intentional false representation or fraud; includes mail fraud and signature fraud
- e. Insubordination, defined as willful defiance of authority and direct or indirect refusal to obey lawful, ethical and reasonable orders or instruction
- f. Failure to follow proper procedure for approving overtime; neglecting or abusing time approver privileges
- g. Misrepresenting hours worked and/or time off on timesheets, especially with intention.
- h. Unsatisfactory job performance, including low productivity, incompetence, negligence, failure to meet goals and deadlines
- i. Gross Misconduct, conduct or behaviors that are illegal and unethical, such as illegal drug use or drunkenness on the job, stealing, gambling, sexual harassment, and criminal activity
- j. Inappropriate disclosure of confidential information
- k. Use of profanity or abusive language
- l. Poor interactions with supervisors, coworkers, clients or any other persons associated with TI, due to lack of professionalism and/or other disruptive behaviors, such as gossiping, or making false or malicious statements concerning a colleague, client, the Agency, or any persons associated with the Agency
- m. Harassment of, or discrimination against supervisors, coworkers, clients or any other persons associated with the Agency because of that person's actual or perceived belonging to a protected class
- n. Threatening, intimidating, or physically assaulting supervisors, coworkers, clients or any other persons associated with TI
- o. Failure to follow the written or verbal instructions of a supervisor
- p. Violating safety rules or requirements
- q. Falsifying or misrepresenting Agency or employment records
- r. Theft or vandalism
- s. Unauthorized use of Agency property
- t. Possession of firearms or other weapons while working or on Agency property



POLICY #: HR9011	TOPIC: <b>Performance Management</b>	DATE:
COA CORE/PRACTICE STANDARD(S):		APPROVED BY:

**POLICY:**

TI is committed to providing regular feedback to full-time and part-time employees on individual work performance. The Agency aims to increase the quality and value of employee work performance, and to support career development, through the following performance management methods:

1. goal setting,
2. observation,
3. evaluation,
4. needs analysis,
5. and professional development.

**PROCEDURE:**

Overview

Evaluation of work performance takes place on an annual basis, in periodic supervision meetings, and as business needs dictate. Job requirements, and expectations for satisfactory performance, may also be reviewed under special circumstances, including new employee orientation, after an internal job change, assignment of a new supervisor, or upon returning from an extended leave of absence. An employee may also specifically request for their supervisor to assist in developing a performance improvement or training program at any time.

Planning & Goal Setting

The supervisor and the employee will meet to discuss the duties of the position and what constitutes successful performance of these duties. This meeting will involve a review of the job description and will establish a clear understanding of the employee’s roles and responsibilities, the supervisor's expectations for satisfactory performance, and any gaps in resource and training needs. A performance planning and goal setting meeting should take place at least once a year, ideally on schedule with the annual performance evaluation.

Career development is an important part of this step; the planning and goal setting meeting provides the opportunity to discuss employee interest in activities which could develop new knowledge, skills, abilities, and further career goals. Career development should be discussed at least once a year, ideally on schedule with the annual performance evaluation.

Supervision and Coaching

Performance observation and feedback will be conducted throughout the year.



The overall effectiveness of the performance management process depends on regular feedback and is the basis of supervision and coaching.

The supervisor will observe and document performance and communicate regularly with the employee to recognize where performance expectations are being met and provide a means for correction where performance expectations are not being met. Discussions will revisit themes established during the planning and goal-setting meeting. Ongoing communication between the supervisor and employee will help to ensure there are no unexpected revelations or surprises when the annual performance review is held.

### Performance Evaluations

Performance evaluations are completed annually on the anniversary of the employee's hire date. The supervisor will review cumulative performance documentation and evaluate the employee's performance over the entire year compared to the performance expectations established during planning, goal setting, supervision, and coaching. An Employee Evaluation form will be completed by the supervisor to record cumulative performance observations.

To provide a timely annual performance evaluation, the direct supervisor or an appropriate designated delegate, will schedule a meeting to review the performance evaluation with the employee within fifteen (15) days of the employee's anniversary date. During the evaluation review meeting, the supervisor will discuss plans, goals, and performance strategies for the upcoming year.

### Pay Raises

The Agency believes in rewarding employees who demonstrate satisfactory work performance, and it is common practice to conduct a compensation review in conjunction with a performance evaluation and award a merit increase. However, a positive performance evaluation does not guarantee a pay raise or continued employment. Agency pay raises and promotions are based on numerous factors, including job performance, professionalism, initiative, attitude, job knowledge, teamwork, and other factors.

The amount of this increase will be a percentage of the employee's salary and will be determined by the direct supervisor. The proposed increase will be approved by the Executive Director, and the increase will be effective on the employee's anniversary date. An increase is awarded, the increase will appear on the paycheck that corresponds to the pay period in which the anniversary date falls. If the performance evaluation is completed after this period has passed, the increase will appear on the next paycheck and will include a retroactive pay adjustment where applicable.

### Position Changes

Where an employee has experienced a position change (e.g. promotion, demotion) and/or a change in reporting relationship (e.g. location change, position change, movement of supervisor) at the time of evaluation, the current supervisor will solicit feedback from the employee's former supervisor, by means of:



- a. Documented direct input from the former supervisor. Former supervisors are expected to cooperate in providing input, unless there is a reasonable justification for non-participation. (e.g. a pending grievance investigation, or other investigation, involving the former supervisor).
- b. Supervision notes and other relevant performance evaluations from the employee's personnel file.

If neither of these options is available to the current supervisor, and if the former supervisor is no longer employed with the Agency, the current supervisor will conduct the evaluation based solely on the employee's current performance.

### Performing Additional Job Responsibilities as assigned

While employees may occasionally be required to perform duties not specified in the job description to satisfy an immediate business need, any major changes in responsibilities will require an updated job description. The supervisor will review any updated job description with the employee. The updated job description will be signed by the employee and placed in the employee's personnel file.

### Cultural Considerations for Managing Performance in a Multicultural Organization

The Agency is committed to attracting, engaging, and retaining a qualified, high performing, and diverse workforce. While our performance management policy and procedure reflects a fair and equitable process for all employees, the following list highlights some key diversity-related principles supervisors can become aware of to more effectively supervise, coach, and provide feedback to employees from underrepresented groups and cultures.

1. Self and Space
  - a. Proximity comfortability
  - b. Greetings
2. Communication and Language
  - a. Non-verbal cues
  - b. Directness and indirectness
  - c. Language barriers
3. Time and Time Consciousness
  - a. Time as a commodity vs. Time as a flexible and relative
4. Relationships
  - a. Relationship to work
  - b. Relationship to peers
  - c. Relationship to authority
5. Values and Norms
  - a. Competition vs. cooperation
  - b. Respect
  - c. Loyalty
  - d. Privacy vs. Openness
6. Beliefs and Attitudes
  - a. Religion
  - b. Gender attitudes



- c. Social norms, especially related to order and authority
- 7. Mental Process and Learning
  - a. Learning styles and information processing (e.g. auditory vs. visual vs. kinetic)
  - b. Intuitive vs. Logical brainstorming
- 8. Physical limitations
  - a. Are physical accommodations being satisfied?
- 9. Work Habits and Practices

#### Management of Performance Evaluation Records

Supervisors will submit completed annual performance evaluations, along with any supporting documentation, in a timely manner to Human Resources, where the documents will be processed and stored in the employee's personnel file.

Employees and supervisors may refer to the Personnel Records Policy on how to access performance evaluation records.



POLICY #: HR9016	TOPIC: <b>Background Check Policy</b>	DATE:
COA CORE/PRACTICE STANDARD(S):		APPROVED BY:

**POLICY:**

In compliance with state law and the Tennessee Department of Children’s Services’ (DCS) policy, TI ensures background checks are conducted on all Agency employees and contractors who may have direct contact with children and youth or who may or may not work with sensitive or confidential information. Background checks are completed during the pre-employment process, then annually thereafter, as mandated by DCS policy.

The policy herein applies to:

1. prospective candidates who are being considered for employment with the Agency;
2. contractors who are being considered for assignment with the Agency;
3. current employees who are being considered for an internal position;
4. all current employees and contractors, as part of the annual background check requirement.
5. current employees and contractors who have been convicted of a crime.

**PROCEDURE:**

Prospective Staff

*Overview*

1. All new employees (benefits eligible, non-benefits eligible and temporary) and contractors are required to undergo a background check.
2. The background check for new hires is completed only after a conditional offer of employment has been made and accepted by the applicant. A valid background check report will be conducted prior to hire. Background checks will include the following, in compliance with DCS policy:
  - a. Criminal records check from local law enforcement records or county court records for all residences of employee within the immediate six (6) months preceding application for employment.
  - b. TBI/FBI fingerprint check. Note: Prospective staff must have fingerprints arranged and the results received within fifteen (15) calendar days from the date of hire. If fingerprinting results do not meet policy requirements, appropriate action will be taken as outlined in this policy.

- c. Driving records check to include current valid driver license and a Motor Vehicle records check. If a position requires the operation of a motor vehicle, the candidate may be ineligible for the position if their motor vehicle record is non-compliant with the Agency's policy on Vehicle Use.
  - d. National Sexual Offender Registry Clearance
  - e. TN Department of Health Abuse Registry Clearance
  - f. TN Drug Offender Registry Clearance
  - g. TN Felony Offender Database Clearance
  - h. DCS database records check, which includes a drug offender check and civil child abuse and neglect registries.
  - i. Review of social media accounts
3. The background check for contractors is completed before a contract has been finalized. A valid background check report will be conducted prior to assignment. Background checks will include the following:
    - a. Criminal records check from local law enforcement records or county court records for all residences of employee within the immediate six (6) months preceding application for employment.
  4. The background check will also include reference checks, employment verification, professional license and certification verification, social media checks and other job-relevant information, such as a credit history check (see Credit History Check below).
  5. A background check must be completed and a satisfactory report received before a new hire or contractor may start a job.
  6. If a candidate was previously employed or on assignment with the Agency within the last 30 days, and a background check was completed within the past twelve months, the results from the previous background check will be considered valid and can used to confirm eligibility for hire.

### *Authorization*

1. Every candidate who is interviewed for a position must complete and certify the accuracy of a job profile and the accuracy of an authorization to complete a background check. In addition to completing a background check authorization, a signed release of information will be required to conduct a background screening.
2. Candidates must provide addresses, including international addresses if applicable, for the previous seven years to ensure the appropriate criminal history checks are



completed. Any candidate who refuses to certify this information will be eliminated from further consideration.

3. When a candidate receives and accepts a conditional offer, an appropriate background check will be completed by Human Resources. Background checks for contractors are completed at the regional level.
4. The Agency utilizes third-party background check companies, including DCS-contracted companies, to conduct criminal background investigations. Employment verifications and academic verifications are completed by Human Resources, where permitted by law.

### *Reference Checks*

1. The Hiring Manager and/or Human Resources will conduct reference checks by contacting at least three (3) professional references. Reference checks will be completed prior to making an offer to a candidate.
2. Hiring managers will follow the prompts of the internal reference check form and utilize interviewing strategies to ensure compliance with EEO and state law.
3. Information provided by references and gathered during the reference check must be retained, along with other application materials. Reference checks should only be kept for one (1) year for candidates who are not hired.

### *Credit History Check*

Occasionally, the Agency may conduct a credit history check for positions that require fiscal responsibility.

1. A satisfactory credit history may only be required when it is a bona fide occupational requirement of the position and as allowed by law.
2. A credit history check may be conducted for jobs that must include one or more of the following responsibilities:
  - a. Management responsibility for setting the direction or control of the department.
  - b. Access to confidential financial information, such as direct deposit or tax information.
  - c. Access to financial information that is not public and relates to the overall financial health and stability of the Agency.
  - d. Custody of or unsupervised access to cash, assets, or Agency property which is safeguarded from general staff and access is only entrusted to select employees (i.e. a company credit card). Loaned equipment is not included.
  - e. Signatory power over business assets over \$100 or more per transaction.

### *Use of Background Check Report Information*

1. Upon completion of the background check, the Agency will ensure confidentiality of candidate information by communicating directly with the hiring manager to confirm only



whether the background check yielded satisfactory or unsatisfactory results and to determine if the candidate is eligible to proceed with employment or assignment in the position.

2. Data and information collected as part of the background check report shall not be used for the purpose of evaluating the applicant for employment unless otherwise permitted or required by law.
3. Human Resources will maintain information collected as part of the background check in separate confidential files. Any staff member who is responsible for an unauthorized disclosure of information collected under this policy will be subject to disciplinary action up to and including termination.
4. The Hiring Manager and/or Human Resources will gather, evaluate, and maintain any job-related background check information and verifications not included in the background check conducted by the agency, such as reference checks or professional certifications.
5. Criminal convictions are not automatic disqualifiers for employment or continued employment, and will be assessed on a case-by-case basis in consideration of:
  - 1) the nature of the offense,
  - 2) the time elapsed,
  - 3) the nature of the job, and
  - 4) other relevant factors.

If a criminal background check yields unsatisfactory results, an exception to hire the candidate must be approved in writing by the Executive Director, in addition to an approved waiver from Tennessee DCS.

6. A candidate who provides false, incomplete, or misleading information on a profile, resume, or in an interview will be immediately eliminated from further consideration for employment.

#### *Candidate Rights and Obligations*

1. Candidates must disclose criminal convictions (excluding convictions that have been sealed or expunged) on the Background Check Authorization Form.
2. The Agency will provide the candidate with an adverse action letter informing the candidate that adverse action may be taken based at least in part on information provided in the background check report. In addition to the letter, the Agency will provide a copy of the information on which the adverse action will be based, and other information as required by law. A candidate denied employment based on the unsatisfactory results of a background check report who believes their background information is incorrect as reported by the third-party company, may contact the company or other entities to provide correct information. The candidate will remain ineligible for hire or assignment to the position unless the official records confirm a correction to the information.



## Current Employees

### *Overview*

1. All current employees (benefits eligible, non-benefits eligible and temporary), and contractors are required to undergo an annual background check, as per DCS mandate. Background checks can also be processed in relation to 1) an internal job application and will depend on the position applied for, and 2) a criminal conviction, voluntarily or involuntarily disclosed to the company.

### *Authorization*

1. The Background Check Authorization Form completed at the outset of employment or assignment is applicable for continuous authorization for the use of annual background checks, internal job applications, and new criminal convictions, as permitted by state law.

### *Reference Checks*

1. For an internal candidate, the Hiring Manager will take special care to ensure the application is confidential. As a courtesy, the Hiring Manager will contact the internal candidate's current supervisor before a conditional offer is extended. Any feedback from the current supervisor will not be the sole determinant in a decision to offer a position to an internal candidate.

### *Use of Background Check Report Information*

1. If a current employee's most recent background check information eliminates the employee from further consideration for a new position, the employee will typically remain in their former position. However, if the employee's most recent background check information reflects that the employee is not qualified, or casts doubt on their ability to safely perform the former job duties, the employee may be ineligible to return to his/her former position and may apply for an open position for which they are qualified.
2. An employee who provides false, incomplete, or misleading information during the internal application or interview process may be subject to disciplinary action, up to and including termination of employment.

### *Staff Rights and Obligations*

1. The Agency will provide an employee with an adverse action letter informing of their rights, as required by law, if an unsatisfactory background check report results in an adverse employment decision.
2. If an employee or contractor is charged with a crime while employed or on assignment, they are required to notify a supervisor immediately so an assessment can be completed. Criminal charges are not automatic disqualifiers for employment or



continued employment, and will be assessed on a case-by-case basis in consideration of:

- 1) the nature of the offense,
- 2) the time elapsed,
- 3) job relevance, and
- 4) other relevant factors.

If a background check yields unsatisfactory results, an employee may be placed on an administrative leave of absence while an employment decision is made. An exception to allow an employee to stay in their position must be approved in writing by the Executive Director and may also require a waiver from Tennessee DCS.

**9. GENERAL POLICIES**

AUTHORIZATION FOR USE OF PERSONAL VEHICLE .....109

AGENCY PROPERTY.....111

    Use of Company Credit Card.....111

TELECOMMUTING POLICY ..... 112

COVID-19 POLICY.....113

PERSONAL APPEARANCE.....114

VERIFICATION OF EMPLOYMENT AND EMPLOYMENT REFERENCES.....116

POLICY #: HR9042	TOPIC: <b>Authorization for Use of Personal Vehicle</b>	DATE:
COA CORE/PRACTICE STANDARD(S):		APPROVED BY:

**POLICY:**

The Agency does not lease vehicles to employees for the purposes of conducting company business, therefore all company business and employment duties which mandate local travel requires the use of an employee’s personal vehicle.

All employees required to operate a motor vehicle as part of their employment duties must maintain a valid driver’s license, acceptable driving record, and appropriate insurance coverage.

Driving and vehicle records will be verified on annual basis, or sooner as governed by this policy.

**PROCECURE:**

Driver’s License

All employees are required to provide proof of a valid driver’s license in the state of residence. Employees are also required to inform management of any changes in driver status, including license renewals, when they arise. The Agency reserves the right to track driver’s license information for all employees to maintain compliance with state and other regulatory laws. Employees are prohibited from transporting clients or operating a vehicle as part of their employment duties if they do not have a current license.

Vehicular Insurance and Registration

State law requires all motorists to carry auto liability insurance, and Department of Children’s Services (DCS) policy requires vehicular and medical liability insurance for all staff who will transport children. It is against the law, and thus Agency policy, to drive without insurance. Employees using their personal vehicle as a part of their employment duties must provide management with a current proof of insurance statement and current vehicle registration.

A new proof of insurance and vehicle registration is required every time your policy expires and renews. Any changes in your driving record, including, but not limited to, driving infractions or changes to your insurance policy, must be reported to the Agency. Employees are prohibited from transporting clients or operating a vehicle as part of their employment duties without a current and sufficient registration of insurance, which includes a minimum of \$100,000 in liability coverage.

Failure to provide proper documentation of insurance and registration will be handled on a case-by-case basis, however, can result in disciplinary action, up to and including suspension and/or termination of employment.

## Driving Record

All employees required to operate a motor vehicle as part of their employment duties must maintain an acceptable driving record. The Agency will run a motor vehicle department check prior to employment, and annually thereafter, to assess an employee's driving record.

The owner of an adverse driving record will be notified, along with information on how to dispute the results.

A motor vehicle record that is non-compliant will be handled on a case-by-case basis, however, can affect prospective employment with the agency or result in disciplinary action, up to and including suspension and/or termination of employment.

## Maintenance

Proper maintenance of privately owned vehicles is the responsibility of the employee. Vehicle maintenance inspections will be conducted at the time of hire, and annually thereafter, by the employee's immediate supervisor.

The Personal Operating Vehicle Maintenance checklist will be completed and kept with the employee's Human Resources file. Please review and check the following items:

- Accurate tire pressure
- All seatbelts are in working order
- Windows are not broken or cracked and can be opened/closed
- Vehicle engine starts correctly with no hesitation or other issues
- Wiper blades are in working order
- Oil change is up-to-date
- Heating/AC operable
- All lights are in working order (inside and outside vehicle)
- Cleanliness of the vehicle

Any issues or concerns should be noted at the bottom of the form and discussed, to include a plan of action.



POLICY #: HR9029	TOPIC: <b>Agency Property</b>	DATE:
COA CORE/PRACTICE STANDARD(S):		APPROVED BY:

**POLICY:**

As part of employment with the Agency, personnel may be issued keys, laptops, and access to other leased materials, such as office space, copy machines, and other office equipment. Electronic files and internal databases are also considered Agency property.

When Agency property is leased to an active employee to perform the essential functions of the job, the employee is expected to treat company property with reasonable care.

**PROCEDURE:**

Employees are responsible for returning Company property in good condition. Any property that is damaged or lost, as the result of personal use or as the result of negligence, is the responsibility of the employee to repair or replace.

Employees are prohibited from using Agency facilities during off-duty or non-working hours without the written consent of the Regional Director. Employees using Company facilities during off duty hours or non-Company hours may be required to sign a log-in and log-out sheet maintained by the Agency or building manager. Under no circumstance should Agency facilities be used for personal use.

The Agency reserves the right to deduct from the employee’s paycheck for lost or damaged Agency property with signed consent. Misuse or misappropriation of Agency property and resources can also result in disciplinary action, up to and including termination of employment.

Use of Company Credit Card

Agency credit cards are entrusted to select employees where there is a bona fide occupational need and issuance requires prior approval from the Executive Director. Every employee in possession of an Agency-issued credit card is expected to adhere to the strictest guidelines of responsibility for the safeguarding and use of that card.

Credit cards should only be used for business-related expenses. Purchases of non-routine goods or services, or for amounts over \$100, must receive prior approval from the direct supervisor. Any expense over \$200 requires approval from the Executive Director.

A credit history check may be conducted at the time of hire, and annually thereafter, for employees who are assigned a credit card for business use.

POLICY #: HR9027	TOPIC: <b>Telecommuting Policy</b>	DATE:
COA CORE/PRACTICE STANDARD(S):		APPROVED BY:

**POLICY:**

Telecommuting, or telework, is defined as an employee regularly working a full or partial workday from home or some other alternate work site.

Agency approval for telecommuting may be granted on an individual basis, by region or location, or across the Agency.

The option for telecommuting may not be available in some job classifications due to business needs. Suitability for telecommuting is at the discretion of the supervisor and/or Executive Director.

**PROCEDURE:**

Employees who meet the eligibility requirements for telecommuting, and are approved for telecommuting, must sign off on a Telecommuting Agreement form and submit it to the direct supervisor. An employee who is granted a telecommuting arrangement will be subject to the same performance standards as they were prior to telecommuting. In the event telecommuting is applied by region, location, or across the agency, the telecommuting agreement may not be required and other protocols may be established and communicated. The Agency reserves the right to evaluate and inspect an employee’s telecommuting work area to ensure appropriate safety standards are being met.



POLICY #: HR9041	TOPIC: <b>Novel Coronavirus (COVID-19) Policy</b>	DATE: July 2021
COA CORE/PRACTICE STANDARD(S):		APPROVED BY: Board of Directors

**POLICY:**

COVID-19 is a highly infectious, highly-transmissible disease that is spread from person to person, and can be transmitted by people with or without symptoms. All employees are expected to exercise responsibility when interacting with clients and other staff by using necessary safety precautions to prevent virus transmission. The Agency reserves the right to revise this policy at any time and will notify employees of any changes.

**PROCEDURE:**

All TI staff are required to follow the safety practices below to protect themselves, TI clients, and other TI staff from COVID-19 virus transmission:

1. Staff who are COVID-19 positive, display symptoms of COVID-19, and/or are living with a person who is either COVID-19 positive or displaying symptoms of COVID-19 will a) inform their supervisor and quarantine immediately, b) will not visit the office, c) attend any in-person agency-sponsored events, or d) conduct in-person meetings with other staff or clients. Staff shall only return to in-person meetings when they have met the criteria to discontinue home isolation and have met with a licensed healthcare provider.
2. Staff will take a temperature check and log temperature when visiting any of our offices, participating in an in-person Agency-sponsored event, or interacting with clients (where applicable). Employees with a temperature of 100.4 or higher can reasonably be suspected of having a fever and will be asked to leave immediately;
3. Staff will wear a quality face mask when visiting the office and while in an enclosed indoor space with others. An employee who is unable to wear a face covering due to medical condition, mental health condition, or disability should let their supervisor know immediately, whereupon the agency will review options for accommodation.
4. Staff will maintain six (6) feet distance from others whenever possible;
5. Staff will disinfect any used surfaces in shared workspaces when visiting the office;
6. Staff who transport children will take steps to ensure their vehicles are clean and disinfected before and after transporting a client;
7. Wash your hands and/or use hand sanitizer often whenever you are at the office or interacting with others.

For more guidance on COVID-19 safety measures, please visit the CDC’s website at <https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/prevention.html>

POLICY #: HR9045	TOPIC: <b>Personal Appearance</b>	DATE:
COA CORE/PRACTICE STANDARD(S):		APPROVED BY:

**POLICY:**

All employees of Therapeutic Interventions are required to report to work neatly groomed and dressed in proper work attire. Employees are also expected to conduct themselves in a professional manner.

**PROCEDURE:**

Due to the nature of services provided by the Agency, and the regulatory protections for clientele served, it is important for employees to present themselves in a professional manner.

Your personal appearance reflects on the reputation and integrity of the Agency.

You are expected to maintain personal hygiene habits that are generally accepted in the community, such as clean, presentable clothing and neat grooming. You are also expected to display appropriate social behavior and professionalism, especially while conducting business on behalf of the Agency or attending Agency events.

Basic guidelines for appropriate work attire prohibit tight and/or short pants or skirts, tank tops, halter tops, low-cut blouses or sweaters, or any extreme style or fashion in dress, footwear, accessories, piercings, tattoos, fragrances or hair.

If a supervisor decides that an employee’s attire or appearance is not appropriate as outlined in this policy, corrective action may be taken, including directing the employee to leave the work area and make the necessary changes to comply with the policy.

The agency asks that employees with visible tattoos keep them covered when representing the Agency outside of the office – at meetings, court appearances, home visits, etc. Employees who work in the office are asked to keep a sweater or other appropriate attire in the office so that tattoos can be covered if an unexpected outside guest arrives.

Employees should keep dress clothes in their vehicles for emergency situations, such as court appearances or other important meetings.

Exceptions

Although it is impossible and undesirable to establish an absolute dress and appearance code, the agency will apply a reasonable and professional workplace standard to individuals on a case-by-case basis. Management may make exceptions for special occasions or in the case of inclement weather or other circumstances where practicality makes sense (outdoor events, physical activities such as cleaning or organizing the office, etc.). An employee unsure of what is appropriate should check with their supervisor.

The Agency also recognizes the importance of the individually held religious beliefs of its employees, and therefore, the Agency will reasonably accommodate an employee's religious beliefs concerning workplace attire, unless the accommodation creates an undue hardship for the Agency or its employees. Please refer to the policy on Religious Accommodation for more detailed guidance.

### Casual Fridays

On Fridays, employees are encouraged to dress more casually and comfortably, with regard to the Agency's professionalism standards. Participation in Casual Friday is not compulsory and is optional; employees are free to report to work in the standard proper work attire as outlined by this policy.

Examples of "casual" attire for the purposes of this policy includes nice jeans, dress shirt, or polo shirt. Supervisors and management reserve the right to direct an employee to leave the work area and make the necessary changes to their attire, if it does not comply with policy (e.g. holes, offensive text or symbols, or if clothes generally do not appear professional).



POLICY #: HR9057	TOPIC: <b>Verification of Employment &amp; Employment References</b>	DATE:
COA CORE/PRACTICE STANDARD(S):		APPROVED BY:

**POLICY:**

The Agency is routinely contacted by prospective employers, financial institutions and residential property managers seeking to verify the employment status, work history, and salary of former or current employees.

All requests for verification of employment (VOE) should be referred to and handled by Human Resources. The Agency is not obligated to complete a request for verification of employment, however, every effort will be made to accommodate such requests.

**PROCEDURE:**

In most cases, the Agency will confirm dates of employment and job title only in response to telephone requests for verification of employment. The Agency may also confirm information already stated by the external party, with discretion. The reporting party is expressly prohibited from providing information that is not job-related.

Responses to written requests for verification of employment will be made on the form provided and only when the request is accompanied by a former or current employee’s signed authorization of release.

A written verification of employment form that has been completed by the Human Resources department will be returned directly to the requesting party.

## 10. ACKNOWLEDGMENT OF RECEIPT AND REVIEW

By signing below, I acknowledge that I have received a copy of the Employee Policy Manual and understand that it is my responsibility to read the Manual in its entirety.

I agree to comply with the rules, policies, and procedures set forth herein. I also understand that by violating the rules, policies, and procedures set forth herein, I may be subject to disciplinary action, up to and including termination of my employment.

I understand that the Employee Policy Manual contains information about the employment policies and practices of the Agency. I understand that the policies outlined in this Employee Policy Manual are subject to change as business needs demand. I understand that the Agency reserves the right to make decisions involving employment, as needed, to conduct its business in a manner that is beneficial to the employees and the Agency. I understand that this Employee Policy Manual supersedes and replaces any and all prior Employee Policy Manuals and any inconsistent verbal or written policy statements.

I understand that, except for the policy of at-will employment, which can only be changed by the Board of Directors, the Agency reserves the right to revise, delete, and add to the provisions of this Employee Policy Manual at any time without further notice. I understand that no oral statements or representations can change the provisions of this Employee Policy Manual. I understand that this Employee Policy Manual is not intended to create contractual obligations with respect to any matters it covers and that the Employee Policy Manual does not create a contract guaranteeing my employment for any specific time period. I understand nothing in this policy manual is created to infringe on any available legal rights.

I understand that this Employee Policy Manual refers to current benefit plans maintained by the Agency and that I must refer to the actual plan documents and summary plan descriptions as these documents are governing.

If I have questions about the content or interpretation of the Employee Policy Manual, I will ask my supervisor, Human Resources, or the Executive Director.

THIS EMPLOYEE POLICY MANUAL IS PROVIDED AS A GUIDE AND DOES NOT CREATE EITHER AN EXPRESS OR IMPLIED CONTRACT OF EMPLOYMENT OF ANY SPECIFIC DURATION. I UNDERSTAND THAT EMPLOYMENT AT-WILL MEANS THAT THE RIGHT TO TERMINATE MY EMPLOYMENT AT ANY TIME, AND FOR ANY REASON NOT OTHERWISE PROHIBITED BY LAW, IS MUTUALLY HELD BY MYSELF AND BY THE AGENCY.

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Signature of Employee : \_\_\_\_\_

Printed Name: \_\_\_\_\_

Date: \_\_\_\_\_

