

PERSONNEL HANDBOOK

This handbook contains the policies of the organization in outline form. St. Louis Center reserves the unilateral rights to add, delete, or amend these policies and benefits provided for in this handbook. Employees should feel free to contact their supervisor or any member of management with questions concerning the contents of this handbook.

PURPOSE

This handbook is intended to serve as your resource and reference guide throughout your employment at St. Louis Center.

WAIVER CLAUSE

I have read this Personnel Handbook and understand the material contained therein. I agree to all the conditions set forth in the handbook and agree to report any violation of these conditions to the management of St. Louis Center. I also understand that I have no reasonable expectation to believe these policies will remain in effect indefinitely. I understand that this handbook does not constitute an expressed or implied contract. I further understand that this personnel handbook does not constitute a contractual arrangement or agreement between St. Louis Center and me. I understand that St. Louis Center reserves a unilateral right to change, withdraw, or add to these policies at any time.

I hereby certify that I have not been excluded from participation in any federal or state healthcare program or been criminally convicted of any crime regarding the federal or state healthcare programs or any offense involving financial issues.

I also understand that the nature of the employment relationship is “at will.” This means that at the sole discretion of either St. Louis Center or the employee, the relationship may be terminated.

ST. LOUIS CENTER'S

PERSONNEL

POLICY

HANDBOOK

Welcome to St. Louis Center.

We are glad that you selected our facility and are offering our residents your services.

We hope that with your input all of us can grow. You will also grow because of the richness and qualities of the residents and of the fellow workers and because of the way of life, St. Louis Center stands for. Grasping the true meaning of the mission of the St. Louis Center will affect your personal life as well; you will be a better person because you are able to discover in yourself all the gifts God gave you; but also you will affect the society at large in respecting and promoting the dignity of each person for the way you behave and interact beyond working hours.

Be proud of being part of St. Louis Center. The Center can reach its goals only with your involvement, partnership and stewardship. You carry with you, accepting the job at St. Louis Center, the duty of being a public relations person for the Center.

The following booklet indicates the terms of your relationship with the Center and of the Center with you.

Be familiar with its contents and strive to make your working experience at the Center a rewarding one.

This booklet will make obsolete any previous Personnel Handbook.

We would like to thank you for being part of our facility and offering our residents your services.

Thank you again and may God bless you.

Sincerely,

Administrator

Personnel Policy Handbook

Table of Contents 10/14/2025

All Forms Reviewed 10/14/25

<u>Update</u>	<u>Label</u>	<u>Title</u>
06/08/20	PEP 4.1.00.....	Mission Statement
10/06/25	PEP 4.1.01.....	History
03/31/21	PEP 4.1.02.....	Philosophy
02/03/22	PEP 4.1.03.....	EEO & Cultural Competency and Diversity
05/24/10	PEP 4.1.05.....	Reasonable Accommodation
06/08/20	PEP 4.2.01.....	Hiring
04/17/08	PEP 4.2.02.....	At-Will Status of Employment
02/05/24	PEP 4.2.03.....	Management Rights
10/06/25	PEP 4.2.04.....	Professional Development Period
07/03/08	PEP 4.2.05.....	Evaluation
04/12/15	PEP 4.2.06.....	Employee Assessment Procedures
10/06/25	PEP 4.2.07.....	Promotion
05/14/24	PEP 4.2.08.....	Work Hours
11/21/17	PEP 4.2.09.....	Time Clock
02/05/24	PEP 4.2.10.....	Wages/Payroll
07/03/08	PEP 4.2.11.....	Personnel Classification
03/01/12	PEP 4.2.12.....	Overtime
03/18/25	PEP 4.2.13.....	Absence
07/03/08	PEP 4.2.14.....	Tardiness
03/01/12	PEP 4.2.15a.....	Leaving Early
10/06/25	PEP 4.2.15b.....	Attendance Documentation
03/01/12	PEP 4.2.16.....	Termination of Employment
05/27/08	PEP 4.2.17.....	Resignation
04/12/15	PEP 4.2.18.....	Criminal Convictions
05/27/08	PEP 4.2.19.....	Staff Reduction
07/28/08	PEP 4.2.21.....	Security Policy
03/01/12	PEP 4.2.23.....	Substance Abuse Lottery
07/29/08	PEP 4.2.24.....	Substance Screen Policy
05/15/15	PEP 4.2.25.....	Staff and Resident Interaction
11/24/08	PEP 4.2.26.....	Employment of Relatives
03/01/12	PEP 4.2.27.....	Fair Employment Policy
02/11/10	PEP 4.2.28.....	Telecommuting
10/06/25	PEP 4.2.29.....	Leave of Absence
05/04/26	PEP 4.3.01.....	Disciplinary Procedures
08/29/20	PEP 4.3.02.....	Discharge
04/17/08	PEP 4.4.01.....	Employee Records
06/03/08	PEP 4.4.02.....	Medical Records File
06/30/17	PEP 4.4.03.....	Training Records
10/10/21	PEP 4.4.04.....	Personnel Records Request
11/18/09	PEP 4.5.01.....	Holidays
10/06/25	PEP 4.5.02a.....	Personal Paid Time Off (PPTO)
03/21/25	PEP 4.5.02b.....	Earned Sick Time (EST)
03/14/22	PEP 4.5.03.....	Shift Trade Requests
07/16/08	PEP 4.5.04.....	Bereavement
10/06/25	PEP 4.5.05.....	Medical Insurance
03/03/22	PEP 4.5.06.....	Worker's Compensation
10/06/25	PEP 4.5.07.....	Employee Paid Benefits
04/17/08	PEP 4.5.08.....	COBRA

06/03/08	PEP 4.5.09	Jury Duty
04/17/08	PEP 4.5.10	Military Leave
04/12/15	PEP 4.5.11	Family Medical Leave Act (FMLA)
03/12/15	PEP 4.5.12	Employee Assistance Program (EAP)
02/25/15	PEP 4.5.13	Education Expense Reimbursement
09/09/09	PEP 4.5.14	Voluntary Furlough (Salaried Staff Only)
04/17/08	PEP 4.6.01	Confidentiality
04/17/08	PEP 4.6.02	Employee's Children in the Workplace
05/16/22	PEP 4.6.03	Personal Appearance
07/28/10	PEP 4.6.04	Expenses
04/18/12	PEP 4.6.05	Telephone Calls
03/18/24	PEP 4.6.06	Smoking
06/30/17	PEP 4.6.07	Meals
04/17/08	PEP 4.6.08	Continued Training and Education
04/10/09	PEP 4.6.09	Communication / Grievances
06/04/08	PEP 4.6.10	Acceptance of Gifts and Loans
06/05/08	PEP 4.6.11	Pornography
03/19/20	PEP 4.6.12	Vehicle Use
06/05/08	PEP 4.6.13	Computer and Internet Policy
06/19/15	PEP 4.6.14	Social Media Policy
04/05/17	PEP 4.6.15	Salary Exempt Status
06/05/08	PEP 4.6.16	Outside Investigations
09/11/17	PEP 4.6.17	Electronic Data Management
09/11/11	PEP 4.6.18	Electronic Mail
09/11/11	PEP 4.6.19	Electronic Data Management Access
12/05/19	PEP 4.6.20	Personal Property Policy
02/27/09	PEP 4.7.01	Statement of Ethical Practices
05/31/06	PEP 4.7.02	Good Moral Character and Criminal Histories
07/29/08	PEP 4.7.03	Outside Activities Policy
06/05/08	PEP 4.7.04	Anti-Harassment Policy
03/27/08	PEP 4.7.05	Dangerous Weapons, Firearms and Ammunition
11/24/08	PEP 4.7.06	Safety Manual
12/01/08	PEP 4.7.07	Conflict of Interest
02/27/09	PEP 4.7.08	Investigations of Ethical Violations
04/05/17	PEP 4.7.09	Mail Pickup and Distribution Policy
04/05/17	PEP 4.7.10	Business Travel Expenses

St. Louis Center serves individuals with intellectual and developmental disabilities in an intentional, faith-based community

St. Louis Center was built by the Archdiocese of Detroit in 1960 and is operated by the Servants of Charity, a religious order founded by Saint Louis Guanella, who devoted his life to those in greatest need, including the developmentally disabled.

St. Louis Center is a private residential care facility for developmentally disabled adults, and is located in Chelsea, Washtenaw County, Michigan. St. Louis Center, licensed by the Department of Health and Human Services, is composed of the following programs:

- St. Louis Center, with a total licensed capacity for 56 residents, ages 18 and over.
- Fr. Guanella Hall/Our Lady of Providence, with a total licensed capacity for 20 residents, ages 18 and over.
- St. Joseph Hall, with a total licensed capacity for 11 residents, ages 18 and over.
- St. Louis Guanella Village, in October of 2017 the ground breaking was held for the construction of the Village. The Village is going to have several components that will result in St. Louis Center's exponential growth.
- In 2018, four new homes were opened, with capacity for 20 residents
- In 2021, the Village expanded, opening two small group homes for adults (6 bed and 4 bed), a duplex and a single family home, for rent to the general community and SLC became an adult foster care facility.

The St. Louis Center personnel dedicate themselves to the premise that it is the right of each resident to be given the opportunity to develop and mature in an atmosphere that encourages and stimulates the growth of individual abilities and skills, regardless of race, gender, creed, or color. Each resident is encouraged to strive towards the attainment of their full potential. By helping and caring for residents to fulfill their religious and educational potential, the family and community are also served, and the kingdom of God spread.

The staff, through the work and the dedication to each resident, will grow and mature spiritually and emotionally experiencing the value of the human life.

Each resident's spiritual, intellectual, emotional, physical, and social growth is guided by concern for them as individual members of society. Within this type of setting, each resident is better able to develop at their own pace, within the realistic range of their abilities, and toward their full potential. Each resident's capabilities are therefore assessed and developed within this "nurturing" environment. The ability to love and to be loved, to achieve their own success, to be useful, productive and creative, and to earn the respect of others is encouraged.

Religious experiences are provided by the staff, parents, and all who have contact with the residents. The religious program provided at St. Louis Center shall give the residents a sense of worth and dignity by fostering a personal relationship between God and man. We believe that this relationship to God, to themselves, and to others shall lead to fulfillment of their faith, feelings, knowledge and values.

A diverse, flexible and individualized treatment plan is provided for each resident in order to bring to fruition each resident's abilities, and to enhance the overall stability of the community.

The educational process at St. Louis Center is an "exchange" process. Residents do not merely learn from staff, but staff learns from the residents. It is a dual process; an extension to all who are either directly or indirectly involved with the operations at St. Louis Center, as well as to the community at large. Resident involvement in the community also enhances the daily programs.

Incorporating the philosophy of the founder of the Servants of Charity, Saint Louis Guanella, it is recognized that each resident has the right to become a self-respecting person in a climate conducive to their individual talents. There is a Spirit of Love and Dedication generating a sense of personal acceptance, faith and mature responsibility through a preventive rather than corrective system.

EEO (Equal Employment Opportunities) Statement:

St. Louis Center is an equal opportunity employer and follows all Acts established by the EEO and does not discriminate against otherwise qualified individuals in its recruitment, employment, transfer, training, promotion and other employment practices on the basis of race, color, creed, national origin, ancestry, sex, age, disability or other legally protected status.

The Human Resources Director is the designated coordinator for enforcing the Equal Opportunity policy. If a staff member believes she/he has been discriminated against, the Human Resources Director should be notified immediately.

Cultural Competency and Diversity Statement:

Cultural competence is the ability of individuals and systems to provide services effectively to people of all cultures, races, ethnic backgrounds, and religions in a manner that recognizes values, affirms and respects the worth of individuals, and protects and preserves the dignity of each. Because St. Louis Center serves clients from diverse cultural backgrounds, we believe that attaining cultural competence and maintaining awareness, appreciation, and sensitivity of cultural diversity, acting on those factors is necessary in order to provide effective service. This is accomplished by reflecting cultural diversity in staff composition, training, and by incorporating cultural sensitivity and awareness into everyday St. Louis Center life through art, music, and client activities.

The Americans with Disabilities Act (ADA) and/or State law protect staff members from job discrimination if they have a disability and are qualified to do a job. A disability is defined as a physical or mental impairment that substantially limits a major life activity, or a record of, or being regarded as, having such impairment.

St. Louis Center will make reasonable efforts to accommodate applicants or staff with a known disability (that substantially limits a major life activity) who are otherwise qualified and can perform the essential functions of a job, unless accommodation would impose undue hardship on St. Louis Center, its residents or staff. Accommodation means a change to a job or work environment designed to facilitate equal employment opportunity. Applicants or staff that requires an accommodation must notify the Human Resources Director or their supervisor promptly upon learning of the need for accommodation.

PEP 4.2.01 Hiring Updated: 06/08/20

Individuals accepting a position at the St. Louis Center are required to undergo and successfully pass a pre-employment physical, drug screen, criminal background check and legally eligible to work in the United States.

The employee understands that the nature of the employment relationship is “at-will.” This means that at the sole discretion of either St. Louis Center or the employee, the relationship may be terminated.

Personnel practices, including the right to hire, transfer, suspend or discharge, to relieve employees from duty and to maintain discipline and efficiency of employees, rests exclusively in the sole discretion of St. Louis Center. St. Louis Center may introduce new administrative methods and job requirements as changing needs indicate.

Nothing in this handbook operates to change the status of the employee from at-will to any other status. All disciplinary provisions in this handbook are advisory. St. Louis Center expressly reserves the right to terminate any employee at the sole discretion of St. Louis Center.

Any representations that change the employee status from an at-will employment status must be in writing and signed by the executive director of St. Louis Center. Any other purported changes in the at-will nature of the employment arrangement are without any effect. Employee acknowledges and certifies that no oral statements or promises of employment beyond the at-will policy of St. Louis Center were made prior to, or relied upon by employee prior to hire.

St. Louis Center expressly retains and reserves the right to operate its business as it determines advisable in its sole discretion. This includes, but is not limited to, the right to:

- Hire, fire, suspend and otherwise discipline Employees.
- To determine the work hours of Employees, to assign Employees and to lay off Employees. Management further reserves the right to reduce work hours and transfer employees.
- To determine the job classifications and duties of each Employee, subject to change without written notice to Employee.
- To manage its affairs efficiently and economically, including the determination of quantity and quality of services rendered, the control of equipment to be used and discontinuance of any services or methods of operation.
- To produce new equipment, methods, or processes, change or eliminate existing equipment, and institute technological changes, decide on supplies and equipment to be purchased.
- To sub-contract or purchase the construction of new facilities, or the improvement of existing facilities.
- To determine the numbers, location, and type of facilities, to direct the work force, to assign the type and location of work assignments, and determine the number of Employees assigned to operations.
- To close or otherwise reduce the scope of operation of any or all facilities.
- To determine starting and quitting times, and the number of hours to be worked by Employees.
- To establish and change work schedules, work standards and the methods of processes and procedures by which such work is to be performed by Employees.
- To select Employees for promotion or transfer to other departments or shifts and to determine the qualifications and competencies of the Employees to perform the available work.
- Management has the right to provide wage incentives, bonuses or other compensation as it sees fit in order to provide increased care to the residents.

Each offer of employment, whether new employee, lateral move or promoted employee, shall be subject to a professional development in order that the Center may decide whether or not a new, staff requested a lateral move or promoted employee is satisfactorily performing his/her duties and the employee may decide whether or not he/she is satisfied with his/her position. During this period, new employees will not receive certain benefits such as medical/dental insurance and sick/personal and vacation time, as described in the handbook. Staff that made a lateral move or promoted employee will keep the current benefits and Center seniority.

This period will last on hundred twenty (120) calendar days for new employees and ninety (90) days for current employees that have been promoted or received a lateral move; however, it may be extended for additional periods if it is unclear whether a new, staff requested a lateral move or promoted employee has the interest or abilities to perform a certain job. At the conclusion of this period plus any extensions, the employee will be evaluated to determine if he/she is adequately suited for the position.

Once an employee completes the Professional Development Period, he/she is expected to continue to properly perform his/her assigned job description in order to maintain employment.

If an employee has to take extended time off (a week or two), for events such as a vacation during their Professional Development Period, this time will be added to their Professional Development Period. If extensive time is need for events such as surgery, the employee may have to start their Professional Development Period over.

PEP 4.2.05**Evaluation****Updated: 07/03/08**

Employees will be evaluated at least annually by their immediate supervisor.

The evaluation (PEF 4.2.6) provides an opportunity to discuss:

- Performance
- Concerns
- Needs for improvement or modification.

Evaluations shall be signed by the employee and supervisor and will become part of the employee's personnel file.

- A. In order to ensure the highest possible standards of professional performance, assessment procedures are a necessary and integral component of the operation of our child-caring facility.
- B. The primary function of an assessment is to provide an opportunity for growth and improvement; therefore, assessments are an essential mechanism utilized to enhance one's professional skills and to make certain that the services provided for the residents are efficient and complete.
- C. An analysis of professional performance shall then be implemented throughout the center regarding administrators various departments, etc. (PEF 4.2.7 – Organizational Chart).
- D. The following shall be the general assessment procedure(s) employed by the center for the Administration:
1. The assessment procedure for the Board of Directors of the center shall be one of self-evaluation.
 2. The Executive Director of the center shall be evaluated by the Board of Directors.
 3. The Board of Administrators, whose function shall be to counsel and advise the Executive Director, shall be evaluated by the Executive Director of the Center.
- E. The Departments of the center shall consist of the following:
1. Kitchen
 2. Social Work
 3. Management/Administration
 4. Medical
 5. Clerical
 6. Housekeeping
 7. Dietary
 8. Maintenance
- F. Each department of the center shall be assessed by Administrator in reference to the following material:
1. Carrying out the philosophy of St. Louis Center.
 2. Goals – must be in harmony with the concept of “Teamwork”.
 3. Methods
 4. Chain of Command
 5. Communicative System – i.e., intra and inter-communication in order to ascertain coordinative efforts.
 6. Role Description
 7. Caseload
 8. Schedules
 9. Record Keeping
 10. Standards of Professional Conduct
- G. Each department within the center shall be assessed annually. This assessment shall take place at the end of each year.

PEP 4.2.06 Employee Assessment Procedures (Continued)

- H. An analysis of departmental performance shall be a continuous, exchange process in order to enhance its effectiveness. Periodic discussions between the Administrator and the Departments of the Center shall take place in order to provide an opportunity to submit recommendations, suggestions, and to provide a general atmosphere for a “sharing of ideas”, and to make changes as necessary to ensure that each Department is effectively performing its necessary functions.
- I. Within each of the departments on-going, individual self-assessments shall be conducted throughout the year.
- J. The following shall be the general assessment procedure(s) employed by the Center for its staff members:
 - 1. The immediate supervisor will conduct an evaluation of the employee on at least an annual basis.
 - 2. The evaluation will be in writing, utilizing an Employee Performance Review.
 - 3. A meeting will be scheduled between the employee and evaluator to discuss the results, get feedback, and to set performance goals for the next year
- K. In addition to the annual review, there is also an ongoing evaluation and exchange process between the employee, supervisors, and Administration. If at any time the Administration believes that for any reason, the employee may be unfit to perform their job duties, they may take all appropriate action to correct the situation, including, but not limited to, training, independent evaluation of the employee’s fitness for work, referral to the EAP Program (PEP 4.5.12), disciplinary procedures, or other actions as the Administration determines is necessary.

It is the policy of St. Louis Center that, as our organization continues to expand and grow, we will endeavor to fill new job opportunities from among our own employees, provided, in St. Louis Center's judgment, a fully qualified person is available.

Positions available will be posted in the time clock room on the human resources bulletin board. Employees who wish to be considered for the position should notify human resources in writing.

Job candidates will be evaluated for characteristics and experience required for the position, in addition to their performance, attendance, dependability, quantity and quality of work accomplished and other factors in their current position.

Wherever possible depending on qualifications, current staff will receive first consideration for available positions.

The St. Louis Center reserves the right to hire outside its current staff if, in the judgment of St. Louis Center, persons from outside the present employees are more qualified.

Professional Development for Promotion or Lateral Move:

When a current staff is promoted or makes a lateral move, there will be a 90-day professional development period for their new position. If it is determined anytime during this 90-day professional development period that it is not working out the staff will be offered their previous position if available.

Working hours will be designated, in accordance with the needs of the various departments.

A regular pay period is two weeks and goes from Friday, 10:00 p.m. to Friday, 10:00 p.m. Employees shall be expected to be at their assigned job at the appointed time and location, and to carry out the duties assigned to them in an efficient manner during the scheduled hours of the workday. Employees in charge of resident supervision may not leave their assigned work location until relieved of their work duties by another employee.

Full-time hourly employees shall work a minimum of 37.5 hours per week on average to maintain benefit eligibility.

On occasion overtime may be required, and will be offered to all hourly employees depending on the needs of the center.

Calculation of minimum hours for hourly employment includes hours worked plus PTO time used. If PTO time has been fully exhausted by an hourly employee, they must physically work the minimum hours stated above in order to maintain eligibility for the benefits available to full-time employees

Salary Exempt employees are expected to take responsibility for their own schedules and shall work (excluding meal or other breaks), on average, a minimum of 40 hours per week.

Calculation of minimum hours for salaried employment includes hours worked plus paid holidays and PTO time used. If PTO time has been fully exhausted by a salaried employee, except in the case of time credited for paid holidays, they must physically work the minimum hours stated above in order to maintain eligibility for the benefits available to salaried employees.

Meal and Other Breaks:

According to Federal and State law, breaks during the workday are not mandatory for staff 18 years or older.

The Saint Louis Center may offer breaks as a courtesy to staff.

Because of our needs here at the Center breaks will not be granted during the first 1 1/2 hours of the start of a shift and 1 1/2 hours before the end of a shift. The only variance from this will be granted by management.

Breaks will only be granted at the discretion of the staff person's supervisor or designee. All breaks must be approved by the staff person's supervisor or designee and the staff must let their supervisor or designee know when they are leaving for a break and when they return.

Breaks of any type are not paid at the Saint Louis Center. It is expected that all employees punch in and out for all breaks. If a break is taken, it must be 20 minutes in length.

A maximum of two breaks will be granted during an 8 or 10 hour shift.

Anytime an hourly employee leaves the campus in their own vehicle they must punch out.

PEP 4.2.09 Time Clock

Updated: 11/21/17

The purpose of time clock is to insure an accurate record of all the hours worked in order to receive correct payment of wages. Employees will be paid for all time worked per their schedule.

In order for an employee to be at their work area at starting and quitting times, all hourly employees are required to clock in for work not more than five (5) minutes before their scheduled starting time and clock out within five (5) minutes after their scheduled quitting time.

Employees are to be at their work place at their scheduled starting time and are to remain on the job until the scheduled quitting time. No one can leave job site prior to the end of his or her scheduled shift without approval of the department supervisor.

In case hourly employees forget to punch the clock in or out, it is their responsibility to inform their supervisor as soon as possible.

Hourly employees can secure a copy of their time record from the time clock at the end of each pay period to verify that they have clocked **in** and **out** each time they worked. Hourly employees found to be working unapproved and unscheduled hours will receive a written warning or termination.

Payroll for St. Louis Center is prepared off the premises. Changes or adjustments will be made as described under the wages/payroll section of this handbook (PEP 4.2.10).

It shall be the policy of St. Louis Center to maintain wage schedules, which assure uniform treatment of comparable positions and recognition for length of service, based on job performance and personal conduct performance.

Paychecks are issued bi-weekly, according to the pay schedule. Paychecks will be subject to deductions for payroll taxes, court ordered deductions, training fees when applicable and those voluntary deductions requested by employees; i.e. insurance premiums, 403B deductions.

If St. Louis Center makes a mistake, a supplemental check will be issued under the following circumstances. Otherwise corrections will be made on the next regular paycheck.

- More than \$50 after Tax
- Must be brought to our attention within 24 hours of receiving check.

Supplemental checks will be issued by the following Monday.

Adjustment of wages and other compensation, if any, are based on cost-of-living, financial conditions of the organization as determined by the budgeting process, and the employment performance of each individual and is at the sole discretion of St. Louis Center. However, there is no guarantee that any wage increase will take place.

In addition, management has the right to provide wage incentives, bonuses or other compensation as it sees fit in order to provide increased care to the residents.

St. Louis Center reviews the compensation of each employee annually. The compensation of salaried and maintenance employees is reviewed on the date of hire anniversary of the employee.

For hourly workers, excluding maintenance and seasonal employees, the annual compensation review is conducted for potential adjustment during the first full pay period in August in order to coordinate with the budgeting process. The annual effective date of wage adjustments, if any, is the first day of the first full pay period in August.

The following policy becomes for new hires effective on August 7, 2010, and applies to employees hired on or after September 1, 2009. This policy does not apply to any new employees hired prior to September 1, 2009.

For new hourly employees (excluding maintenance and seasonal employees) hired on or after September 1, 2009, the first year wage adjustment, if any, will be prorated according to the amount of time from the hire date to the annual compensation adjustment date.

As an example, if the annual adjustment date is August 1, the proposed adjustment amount is 40 cents, and the new employee was hired on May 1, the employee's adjustment will be prorated to 3/12 months, or ¼ of one year. In this example, the amount of prorated increase would therefore be ¼ of 40 cents, which is 10 cents. Note that this is an example only to illustrate the method of proration, and may not reflect actual numbers for any given situation.

Employees may elect to either receive a check at St. Louis Center offices or to designate direct deposit to their account(s). St. Louis Center requires at least 30 days notice to implement any changes to this designation.

There are currently four classifications of personnel that perform job duties at St. Louis Center. Each has its own unique set of guidelines and procedures.

Servants of Charity

This is the Catholic Community of priests and brothers that founded the St. Louis Center, and serve as its primary administration. The order has its own mission and guidelines based on commitment to religious faith, which are not required of any of the personnel classifications. If you would like any more information about the Servants of Charity, you are encouraged to speak with any of the members of the Community.

Salaried Exempt Employees

This classification means that these employees are exempt from overtime provisions, which apply to hourly employees.

This classification applies to employees who are paid on a salary-only basis and meet the requirements of exempt employees under the Fair Labor Standard Act.

Salaried Non-Exempt Employees

This classification means that these employees are no exempt from overtime provisions.

This classification applies to employees who are paid on a salary-only basis and do not meet the requirements of exempt employees under the Fair Labor Standard Act.

Hourly Employees

This classification includes employees that are paid on a per-hour basis, and for which overtime provisions apply, as described in the overtime section of this manual (PEP 4.2.12).

Defined:

The Fair Labor Standard Act (FLSA) states that hourly employees must receive overtime pay for hours worked in excess of 40 hours in a workweek.

The policy for the St. Louis Center is:

Overtime: All Hourly employees shall be paid overtime for all hours worked over 40 during the workweek. No overtime will be earned until the employee has worked on the job over 40 hours during the workweek, except in the case of holidays. The workweek is defined as Friday 10 p.m. to Friday 10 p.m.

The policy only applies to actual hours worked during the 40-hour workweek. During that time if you use vacation, sick or personal time, it will not be considered when calculating overtime.

There are exceptions for Holidays worked. See policy PEP 4.5.1.

Overtime Rate: All Hourly employees who work approved overtime will receive overtime pay at a rate of time and one-half.

Overtime Approval: Unscheduled overtime must be approved by the assigned supervisor.

Upon accepting employment with St. Louis Center, the employee assumes the personal responsibility of being on the job each scheduled day. It is the employee's duty to strive for perfect attendance. Absenteeism carries a burden on the residents, the program, and other staff members.

When reporting a call-out or late arrival the **employee must personally call the Center** and speak with the HR Director when available, if not available then the employee must speak to the supervisor on duty concerning each day he/she is going to be late or absent. Failure to do so will result in:

- The employee being recorded as "late, no-call" or "absent, no-call"
- Written warning/disciplinary action. **Only employee direct calling and speaking with the HR Director or supervisor on duty will be accepted**; call-outs or late arrivals on voice mail, email, texting, or any other form of communication are not acceptable unless a prearranged accommodation is put in place. This accommodation will only be granted on a case-by-case basis and must be documented by a doctor.

Accommodations:

As stated in policy, PEP 4.1.05 and PEP 4.5.02b the Center attempts to conform with the ADA and the Earned Sick Time Act (ESTA). If there is a medical issue with our staff communicating over the telephone we, with proper medical documentation, will arrange other methods for that staff to communicate. Once this accommodation is arranged, it is expected that this method will strictly be followed. This only applies to the method of communication. All other parameters of this policy are expected to be followed.

Acceptable absenteeism/tardiness:

The Center follows the nationally acceptable absenteeism/tardiness of less than 1% of shifts worked. If a staff exceeds this standard, documentation of future absences/tardiness may be required, for non-ESTA absences. In addition, the staff may be placed on a Personal Improvement Plan (PIP) regarding time missed that is not ESTA related. A no-call / no show is not a medically necessitated absence under the ESTA unless it is documented that notice could not be give, and will be an unapproved absence (Refer to PEP 4.5.02b). Once a PIP is issued, the staff will have 30 days to improve their attendance. It is expected that staff will continue with this improvement. If the issue continues, the staff will be given one more chance to make and continue this improved attendance record. If they fail, the following will occur:

- Written Warning with Suspension
- Termination

All the notifications will have to be directed to the HR Director when available or when not available to the supervisor on duty.

Acceptable time notification for Call-Outs per shift is listed below:

- One hour if your starting time is before 8:00 a.m.
- Two hours if your starting time is between 8:00 a.m. & 11:00 a.m.
- Three hours if your starting time is between 11:00 am & 8:00 p.m.
- Four hours if your starting time is after 8:00 p.m.

To maintain a productive work environment, St. Louis Center expects our employees to be reliable and punctual in reporting for scheduled work. Tardiness results in a burden to the Company's overall operations. Employees who are unable to be at work on time, or are unable to work as scheduled must notify St. Louis Center as soon as possible via telephone in advance of the tardiness (See PEP 4.2.13 Absence).

The reason for tardiness may be appealed to the St. Louis Center Administration at the time of write up.

Excessive tardiness of five or more minutes will result in the following disciplinary action. It is the responsibility of the employee to keep track of their schedule and punch into work by their scheduled time. Failure to arrive on time will result in the following action:

An employee arriving after the start of their scheduled shift two or more times in a pay period will:

1st occurrence

Written Warning

2nd occurrence

Written Warning

3rd occurrence

Written Warning

4th occurrence

Written Warning with a 3-day suspension without pay

5th occurrence

Written Warning with a 5-day suspension without pay

6th occurrence

Termination

Supervisory staff must approve early leave in writing. Staff and supervisor must complete a work schedule adjustment form, stating reason for the leave. Both must be completed on the day the employee leaves early.

Purpose:

The purpose of this policy is to clarify, if and when supporting documentation is required for absences, tardiness and requests to leave early.

Staff on Corrective Action:

Staff that are on a PIP (Personal Improvement Plan) or warning for excessive absences, tardiness, requests to leave early or any combination of the aforementioned will be required to provide documentation to return to work their next shift. This requirement will remain in place for the duration of the PIP or warning.

The corrective action for failing to supply the required documentation will be included in the PIP or warning.

Staff in Professional Development Period (First 120 days, unless extended):

Staff that are in their Professional Development Period may be required to provide documentation of all absences, tardiness or requests to leave early, as required in PEP 4.2.04 Professional Development Period policy.

Employment may be terminated by resignation or discharge.

Each employee, upon discharge or resignation, shall engage in an exit interview. At the time of this interview, the employee may be asked to fill out an exit interview form. He/she will also be required to return all St. Louis Center property presently in his or her possession, including, but not limited to, keys, gasoline credit cards, petty cash, etc. Failure to return St. Louis Center property may result in fees being charged to the employee to cover cost of replacement.

Employees will be paid for Paid Time Off (PTO) they have accrued to the date of termination only, subject to the provisions of PEP 4.5.2 regarding PTO.

Notice of resignation must be in writing and, at a minimum, 2 weeks in advance of termination date in order for St. Louis Center to arrange for replacement. No PTO is allowed to be taken after 2 weeks written notice is given. Any PTO that was previously scheduled for the 2 weeks notice period will be cancelled. No PTO will be allowed unless the employee works all scheduled shifts during the 2 weeks notice.

For highly skilled or key salaried positions, employee should consider additional notice to allow St. Louis Center to make an orderly transition to cover the duties of the position.

The last paycheck will be mailed to the employee within three business days, and will include time worked and PTO accrued to the date of termination, subject to the provisions of PEP 4.5.2.

Employee shall submit a written notification of resignation to the human resources manager at least two weeks in advance. The Employee is also required to notify his or her supervisor.

A summary explanation of post-termination benefits, if any, is available from the Human Resource Department. Employees are urged to promptly read the medical plan booklets explanation of conversion privileges, if applicable.

Each employee, upon termination or resignation, shall engage in an exit interview. At the time of this interview, the Employee may be asked to fill out an exit interview form. He or she will also be required to return all Employer property presently in his/her possession, including, but not limited to, keys, cell phone, gasoline credit cards, petty cash, etc. Failure to return St. Louis Center property may result in fees being charged to the employee to cover cost of replacement.

It is the policy of St. Louis Center to conduct a criminal history check of each employee through the Michigan State Police and Federal Bureau of Investigation. The check will be conducted when an individual accepts a conditional job offer.

If St. Louis Center substantiates that the employee provided dishonest or false answers on the job application or during all pre-hire interviews, the employee will be terminated immediately.

Should a criminal history report include information that suggests the employee is inappropriate to work with vulnerable adults and children; The St. Louis Center will investigate the accuracy of the criminal history report and allow the employee a reasonable amount of time to refute the contents. During the course of the investigation, St. Louis Center reserves the right to suspend, without pay, the employee until the matter is resolved to the sole satisfaction of St. Louis Center.

An employee who is under investigation or is charged with a crime may be subject to suspension without pay or re-assignment until the investigation or charge is resolved.

If the charge is not conclusively resolved in the court system, St. Louis Center reserves the right to determine the employee's continuation of employment with the Center.

Pursuant to Public Act 59 of 2004, Employees will immediately report to the St. Louis Center Administration any arrest for or conviction of a felony or misdemeanor.

Employees who are convicted of a felony, serious misdemeanor or any other serious crime, the nature of which implies that the employee is incapable of performing his/her job with honesty, are subject to termination. Employees, who are convicted of a crime that shows a lack of good moral character, as determined by the Department of Social Services Rules on Good Moral Character, are subject to termination.

The hiring of individuals convicted of a felony or misdemeanor will solely be at the discretion of the St. Louis Center.

Should a reduction in staff become necessary for any reason; job performance, attendance, seniority, individual qualifications, essential services per job classification, and other factors may be considered as the basis for retaining staff members.

All outside doors will be locked by 11 p.m. each evening. Inquiries will ring bell for admission only. The bell is located on right-hand of foyer. The doors are unlocked at 6 a.m.

Staff entering or exiting the Center are asked not to take bags or packages to and from the units. For the safety of our residents and staff, St. Louis Center reserves the right to inspect bags or packages that are taken from or into the units. Staff is requested to leave items that not required by your job duties to be left in their vehicle or the staff lounge.

All visitors to the residential units must be accompanied by a staff member, or must have prior authorization and must sign in on the sheets provided for that purpose. No visitors are allowed in the units without prior permission and clearance from Administration.

The religious quarters are private; authorization is required for entry.

Supervisors sign out the unit keys daily along with their walkie-talkies in the front office (PRF 5.3.10). Making copies of any key is prohibited unless specifically authorized by the Administrator.

All keys are to be turned in at the end of shift. The staff turning in the keys must write their name on the sign in/out sheet. The staff receiving the keys must write their name next to the staff name giving them the keys on the sign in/out sheet. The shift supervisor must be made aware of the change of ownership of the keys and then initials the sign in/out sheet. (PRF 5.3.10)

Vehicle keys will be issued at the front desk.

Laptops/Chrome books will be locked in each unit when not in use. The Laptops will be signed over to the next shift at the same time the keys are signed over.

Due to liability insurance requirements, no family members/friends, etc. are allowed to stay in the residential units overnight, regardless of the circumstances.

St. Louis vehicles, notebooks, cell phones, and walkie-talkie's are not to be used for private use, but for work-related matters only.

All visitors must report to the front office upon entering the building.

The sign-in and sign-out sheet (PRF 5.3.08) must be used for any resident leaving the facility on an unscheduled outing.

Resident attendance sheets (PRF 5.2.01 and 5.2.02) must be made out during the third shift on a daily basis. These must be turned in to the bookkeeper at the end of each day.

Every calendar month a random drawing will be conducted through the computer.

The randomly selected employee will report to the designated medical facility for a drug screen within 2 hours of the beginning of their shift. The results will be forwarded to Administration.

If an employee refuses a substance screen, by blood or urine test, that employee will be treated as insubordinate for failure to obey a directive and such action may be grounds for dismissal.

It is the policy of the St. Louis Center to maintain a drug free work environment for employees. St. Louis Center reserves the right to require employees to submit to a substance screen by urine or blood sample when requested.

A. Policy Purpose

- Assure a drug free staff to service our residents – many who are medically involved.
- Reduce vehicle accidents and in home accidents.
- Assure greater safety of staff operating equipment in the home.
- Maintain high staff morale and employee performance for the benefit of staff and residents.
- Reduce crime in the work place.
- Reduce absenteeism and tardiness.
- Increase staff effectiveness, productivity and reliability.
- Secure a living environment that protects the residents' property and well-being, and sustain the highest quality of residential care service.

B. Pre-Employment Substance Screen

All new job applicants shall be informed that a substance screen is incorporated in the pre-employment physical. Successful completion of the substance screen portion of the pre-employment physical is a condition of employment that must be met before the offer of employment may be accepted.

- The hiring agent shall explain the nature of the screening procedure to the applicant.
- If, an initial substance screen test is positive, it will be followed with a confirmation test.
- An applicant shall be notified by St. Louis Center of a positive finding resulting from the substance screen, and shall have five (5) working days in which to challenge positive test results.
- Confidentiality of substance screen results shall be assured. The test results will be used for hiring purposes only. Test results will not be released to anyone except the management staff of St. Louis Center.
- An applicant who has received an offer of employment, and subsequently refuses to submit to the substance screen portion of the physical shall be in default of the terms and conditions for employment with St. Louis Center, and the offer of employment shall be null and void. The applicant may reapply for employment if desired after twelve (12) months.

C. All Employees

- No employee shall possess, consume or carry with them alcoholic beverages of any kind, controlled substances not prescribed by a physician, or illegal drugs on employer's property or in an employer's vehicle or any other location during working hours.
- No employee shall report to work after consuming alcoholic beverages controlled substances, or illegal drugs in a condition that makes him or her unfit for full and reliable performance of job responsibilities and appropriate care of residents entrusted to his or her care.

PEP 4.2.24 Substance Screen Policy (Continued)

- Any employee suspected of being under the influence of drugs or alcohol, or any other good cause, will be required to submit to urine analysis or blood test. St. Louis Center will provide transportation for employee to take test.
- Any employee involved in an accident may be required to submit to a drug or alcohol test.
- Any employee involved with damage to equipment belonging or entrusted to St. Louis Center may be required to submit to a drug or alcohol test.
- Any employee who has indicated that he or she is unable to perform their duties or has given employer cause to suspect drug or alcohol usage affecting his or her job may be required to submit to a drug or alcohol test.
- Excess or unusual absenteeism may be cause for drug or alcohol tests.
- Any employee convicted of selling drugs, or convicted of illegal drug usage, or illegal possession may be terminated.

D. Procedure

- A substance screen shall be by securing a urine or blood sample.
- St. Louis Center will utilize only professionally developed and administered drug detection tests and will pay all costs for drug detection tests. In addition, the employee will receive a copy of the test results and all reports or analysis prepared because of a positive confirmation test.
- The sample will be secured by means of a Chain of Custody program at the clinic to assure identification and integrity are maintained from collection through testing.
- The drugs being identified are those drugs that are used or abused, are not part of a medical treatment plan, and may alter the thinking and actions of its user. The classes of drugs frequently identified by way of illustration and not a total listing of all drugs are: amphetamines, barbiturates, benzodiazepines, cocaine, opiates and cannebenolds (Marijuana or THC). Some over-the-counter drugs may be identified. Positive results will be evaluated in context of the individual's complete medical history.
- The specimen will be subject to an initial screen. If a drug is detected, it will be followed with a confirmation test.
- The results of a drug detection test shall be kept confidential unless disclosure of results is mandated by law, by a court decision, or by the advice of employer's attorney, or when an employee challenges the results of the test.
- When an employee's confirmation test results are positive, specimens of the tested fluids will be saved in order to enable the employee to challenge test results. The employee will have three days from the date of notification of positive test results to make an official challenge of results and will be required to make arrangements at an approved laboratory for an alternate test and pay for these additional tests, at his or her own expense.

PEP 4.2.24 Substance Screen Policy (Continued)

If the results of the employee's test differ from St. Louis Center's, the employee shall authorize release of the test results to St. Louis Center. St. Louis Center will reconsider the results and take action accordingly.

E. Rehabilitation

- All employees who admit they have a substance abuse problem or test positive for drug or alcohol use and who want to go through a drug or alcohol rehabilitation program for the first time will be conditionally reinstated to their job after successfully completing the substance abuse rehabilitation program. Employee must maintain the preventive course of conduct prescribed by the employee's drug or alcohol counselor and his/her doctor, including, but not limited to, regular attendance at AA meetings. Proper documentation and verification of being free of drugs and a doctor's statement shall be required before the employee will be permitted to return to work.
- An employee who is diagnosed as a drug abuser or alcoholic may be granted an unpaid medical leave of absence consistent with the terms and conditions of St. Louis Center's leave of absence policy. The employee will not be permitted to return to work until certification is presented to St. Louis Center indicating that the employee is capable of satisfactorily performing his or her job responsibilities. Failure to cooperate with an agreed upon rehabilitation treatment plan may result in discipline up to and including employee termination.
- Employees who do not follow the prescribed preventive maintenance treatments by their drug or alcohol counselor and who engage in drug or alcohol abuse will be subject to immediate termination. Employees will have only one opportunity to go through a rehabilitation program.
- Employees who refuse to seek appropriate help or rehabilitation, as determined by St. Louis Center, shall be subject to dismissal.
- The employee (or St. Louis Center) shall be responsible for all medical and rehabilitation costs and fees unless the health insurance program provides coverage, if applicable.

F. Refusal

If an employee refuses a substance screen, by blood or urine test, that employee will be treated as insubordinate for failure to obey a directive and such action will be grounds for dismissal.

As a human services agency, St. Louis Center treats its residents with dignity and respect and provides a nurturing family atmosphere for them.

Because our residents have been entrusted to our care, we establish bonds with them, we become like a family to them, and we work for their physical, emotional, social, and spiritual growth. This requires stamina, courage, patience, and an on-going study of their needs in order to provide the right environment to achieve this goal. The residents, for their part, look to us as the adults who model for them the art of living; they depend on us for their whole well-being. For this we have to use our position in a professional manner and not for personal gain.

Because of their personal and physical needs, we have to assist our residents in their self-help tasks. We do this with sensitivity, respecting the value of their bodies and personality, having in mind that they are vulnerable. We use a discrete approach in carrying out this task. Implementing this we follow what has been agreed upon in the Service Plan, in the Treatment Plan and in the PCP.

Other times our residents need physical signs of affection. After consulting with the clinical team, staff will follow and utilize the method of physical interaction the clinical team deems appropriate for each resident. The physical interaction is based on the age and needs of each resident. This interaction must be approached from the standpoint of the whole well-being of the resident. The well-being of the residents needs to be promoted and at the same time they must be protected from exploitation. Over-familiarity cannot be tolerated.

Staff shall always consider the resident's diagnosis, therapeutic needs, developmental stage and needs, past history, and SP, TP and PCP goals and objectives when physically interacting with residents. When interacting with residents with Autism Spectrum Disorder the level of touch should be initiated by the resident and be determined by the behavior management plan. The resident's chronological age and the level cognitive functioning should both play a factor in the level of physical interaction in order to promote normalization.

Appropriate Forms of Touch:

- Shake hands
- High five hands
- "Pound" with fist
- Touch on shoulder
- Gently rub the upper back as therapy if behavior plan calls for it to relieve anxiety
- Side hugs as spelled out in the SP, TP and PCP
- Resident may lay their head on the lap of the staff as long as there is a pillow placed between resident's head and the staff's lap. The resident head must be visible at all times.
- Staff may gently hold the resident's hand as a form of support and/or redirection.
- Staff may offer residents their arm to hold on to as a form physical assistance while ambulating.

PEP 4.2.25 Staff and Resident Interaction (Continued)

Inappropriate Forms of Touch;

- Kisses of any type are not appropriate, approved form of interaction.
- A resident sitting on the lap of staff is not an appropriate, approved form of interaction.
- Full-frontal hugs are not an appropriate, approved form of interaction.
- Staff sitting or laying on a resident's bed is not an appropriate, approved form of interaction.

Anything that doesn't follow these principles and practices violates our philosophy, may require filing a report with regulatory authorities and will require a resolution that supports the best interest of the residents.

The employment of relatives of employees is permitted by the Center, as long as qualifications for the position are met and, in the opinion of the Center, employing the relative will not create an actual or perceived conflict of interest. Employees will not be permitted to work in positions where relatives will influence, or be influenced by, decisions affecting work assignments, responsibilities, salary, promotion or other career matters unless otherwise approved by the Administration of the Center. Department Heads who seek to hire, transfer or promote their own relatives must obtain prior written approval from the Administration of the Center.

Relatives include: spouse, parent, parent-in-law, child, grandparent, grandchild, sister/brother, sister/brother-in-law, aunt/uncle, niece/nephew or cousin.

Employees shall not be discriminated against on the basis of race, age, color, gender, socioeconomic status, national origin or spiritual beliefs with regard to the following areas:

- Employment
- Compensation
- Work assignments
- Promotion

The final decision to accept or reject an applicant shall be the prerogative of the Administrator.

DEFINITIONS

Telecommuting is the use of telecommunications and computer technology to allow selected employees to perform some or all of their assigned duties at a location other than the division's office address during assigned work hours. This definition does not include attendance at meetings, work related appointments or other off-site functions, whether or not the employee utilizes telecommunications or computer technology to connect from those sites.

Telecommuter is an SLC employee who has been given permission to telecommute.

Off-site Work Site is the primary location away from St. Louis Center grounds that is approved for the use of St. Louis Center equipment issued to the employee. This will typically be the employee's home.

ELIGIBILITY CRITERIA

Telecommuting is not a universal employee benefit, and is not available for every job or every employee. To telecommute, the employee must meet both eligibility and selection criteria. Eligibility alone does not determine selection. An employee is selected to participate at the sole discretion of the Administrator.

Only employees who satisfy the following eligibility criteria may be selected for participation in the program:

- No pending personnel related disciplinary action
- Portable job duties
- Availability of an off-site work site suitable for telecommuting
- Not on probationary status

POSITION SUITABILITY

Some positions are more suitable for telecommuting than others. Jobs that do not require face-to-face interaction with other employees, require minimal supervision, involve the extensive use of computers and/or telephones, and have clearly defined and easily measurable tasks are more appropriate for a telecommuting arrangement. The Administrator will examine the distinct activities, functions and tasks of an employee's position to determine whether the position is appropriate for a telecommuting arrangement.

PEP 4.2.28 Telecommuting (Continued)

PARTICIPANT SUITABILITY

The characteristics of a successfully telecommuter includes, but is not limited to:

- Dependable
- Self-motivated and responsible
- Knowledgeable about St. Louis Center policies and procedures
- Independent worker needing minimal supervision
- Possesses good organizational skills
- Effective communicator
- Adaptable to change
- Results oriented

In selecting participants, the Administrator will review and consider whether the employee possesses these and other pertinent characteristics.

SELECTION CRITERIA

Selection of participants is a key activity from both an individual and organizational standpoint. Selection of program participants is within the sole discretion of the Administrator, and may be revoked at any time for any reason.

Criteria used to select participants include, but are not limited to:

- Eligibility criteria are met
- Suitability of the position and participant
- Nature of the work to be accomplished
- Job duties with clearly defined performance requirements that are measurable and results oriented
- Achieves the business needs of St. Louis Center
- Ability of the employee to adapt to a telecommuting arrangement
- Current and past performance reviews
- Availability of computers and other equipment

Under limited circumstances as determined by St. Louis Center Administrator, a full time salaried or hourly employee may be granted a Leave of Absence (LOA), as follows:

- A Leave of Absence (LOA) is defined as time off from work without pay.
- The cumulative hours between PTO and LOA shall not exceed 120 hrs. in a calendar year.
- The LOA benefit cannot be carried out from year to year and has to be used from January 1 to December 31 of the same year.
- PTO cannot be accrued during Leave of Absence (LOA).

In order to apply for and receive a LOA, an employee must meet the following eligibility criteria:

- Trial period must have been completed
- No pending personnel related disciplinary action
- Except for emergencies, application must be made at least two weeks in advance
- Employee is not on probationary status
- Circumstances must not be covered under FMLA, Military, or other types of Leave
- All PTO must be exhausted
- The employee has to state the reasons for requesting LOA

A LOA is granted at the sole discretion of the Administrator, based on the circumstances and the specific request. Eligibility alone does not determine if an employee will be granted a LOA.

Additional factors that may be considered include, but are not limited to:

- Staffing needs during the LOA period being requested
- The nature of the circumstances involved
- The employees work record and history

Employees who perform unsatisfactorily or break any policy/procedure at any time during their employment may be subject to:

- Verbal Warning
- Written Warning
- Suspension
- Discharge

Verbal warnings will result in a memo to the personnel file. This memo will specify:

- The nature of the problem.
- Corrective action taken.
- The result that will occur if the problem is repeated. Results may include additional verbal warning(s), suspension, written warning, or termination of employment.

Written warnings will result in a Written Disciplinary Notice form to the personnel file.

Three written warnings will result in termination of employment.

PEP 4.3.02 Discharge Updated: 08/29/20

St. Louis Center (Center) reserves the right to discipline and/or dismiss an employee whenever circumstances, in the opinion of the Center, warrant such action. Written Disciplinary Notices may be issued by the Center and any employee who receives three (3) such Written Disciplinary Notices is subject to immediate dismissal.

Employees who do not satisfactorily complete the trial period may be discharged.

Employees who perform unsatisfactorily at any time during their employment may be discharged.

Employees may be discharged immediately without warning for misconduct, which may include, but is not limited to the following:

- Abandoning unit, 1:1, or work assignment, such as; leaving residents' unattended for any period of time, leaving assigned unit or work detail for any purpose.
- Mistreatment of a resident
- Serious professional negligence
- Falsification of records or reports
- Dishonesty or theft
- Immoral behavior
- Possessing or being under the influence of alcohol, other intoxicant or drugs on the Center's premises at any time
- Inability to perform the necessary requirements of the position
- Punching another employee's time card
- Insubordination
- Any willful or negligent act causing danger or injury to another individual
- Possession of a dangerous weapon on the Center's premises at any time
- Fighting or disorderly conduct on the Center's premises
- Verbal, psychological or physical abuse of an individual
- Divulging confidential information concerning the Center, residents or staff
- Intentional destruction of property owned by the Center or individuals
- Failure to report for duty after a Leave of Absence
- Violation of fire regulations; smoking in unauthorized places
- Failure to comply with requirements regarding physical examinations, tuberculin testing and drug screening
- Abusive language; use of profanity or abusive language toward others
- Sleeping while on duty
- Any other conduct contrary or detrimental to the spirit and character of the Center.
- No call-no show for 3 consecutive days
- Employees who are convicted of a felony, a serious misdemeanor or any other crime are subject to dismissal
- Unapproved contact with Center residents/families during or after work
- Unapproved photography or audio/video recording on the Center's campus or on outings.
- Unapproved distribution of any Center related photography or audio/video material.

State standards require us to maintain in our files complete personnel records. These records are private and confidential. Employee's file will contain the following information as applicable:

Pre Employment Information

- Application
- Conditional Job Offer
- Physical and Drug Screen
- Proof of education, experience and training
- W-4 tax forms
- Copy of drivers license
- Record of any convictions other than minor traffic violations
- Professional or vocational license certification or registration #, if applicable
- Verification of reference checks
- Verification of the receipt of personnel policies & procedures and job description
- Three character references which are obtained prior to employment from persons unrelated to the employee:
- One should be former employer

Records of Employment

- Confirmation of employment
- Assignments – job descriptions
- Wages
- Evaluations
- Correspondence
- Health insurance application
- Unusual Incident Reports/Grievance forms
- Disciplinary records
- Attendance records
- Letters of resignation
- Termination reports
- Friend of the Court and/or Court ordered wage garnishments

To preserve the confidentiality of personnel records:

- All paper and electronic human resource records are maintained in a locked, secure location
- All requests for human resource information from outside of St. Louis Center must be in writing and be directed to the Human Resources Director.
- The Human Resources Director will determine if a valid written Authorization To Release Human Resource Information is used or will assist with one if the employee chooses to provide written authorization to release human resource information.
- If there is no valid written authorization signed by the current employee, no information will be released unless the information is required by State or Federal Law and will seek legal counsel when necessary or may direct the outside inquiry to the CEO.

PEP 4.4.01 Employee Records (Continued)

For the purpose of maintaining complete and accurate personnel records, employees are required to report any changes in their personal status to the office, within 5 business days. The information needed is:

- Change of address or telephone number
- Change affecting your tax withholding status
- Legal change of name
- Changes that would affect your insurance benefits/or employment status.

St. Louis Center will maintain medical records files for its employees, as applicable. These records are private and confidential and will remain separate from the employees personnel file.

- TB tests annually
- Annual health appraisal form
- Doctors notices
- Physicals
- Drug screen

The Human Resources Director and the Training Coordinator will maintain records of training for all employees.

Bullard Plawecki Employee Right to Know Act permits employees to review personnel records, provides criteria for the review and prescribes the information that may be contained in personnel records.

GUIDELINES: Employees may review his/her personnel record up to two times per year by completing and submitting form PEF 4.2.09 to Human Resources and indicating which files he/she wishes to review. A personnel record may include the following information:

- New Hire application, resume, forms, etc.
- Payroll
- Benefits
- Criminal History Check
- Medical
- Worker's Compensation
- Safety & Accident
- Certifications
- Corrective Actions
- Evaluations

PROCEDURE:

1. Upon receiving a request to review personnel records, Human Resources will review which files the requestor wishes to review and arrange a time to review the files. This will be completed within ten business days from the date the Human Resources receives the request (Form PEF4.2.09). The appointment will be scheduled during normal business office hours.
2. The Human Resources will sit with the person reviewing the files to ensure that nothing is removed, added or altered.
3. Following the review, Human Resources will:
 - a) Ask the reviewer to sign and date the Personnel File Review Form (PEF 4.2.09), which is kept in the employment/compensation file.
 - b) If copies are requested, Human Resources will ascertain which documents the employee wants copied and arrange a time for the employee to pick up the copies. If an employee wants copies of records, he/she will be charged \$.10 per page. The employee must present cash or a check made payable to St. Louis Center prior to receiving the copies
 - c) Redact information of a confidential nature, such as names, addresses, and social security numbers of other individuals if contained in the copied records.

Salaried Employees

Salaried employees receive the following holidays, paid according to the shift that is normally worked (8 hours or 10 hours). When the holiday falls on Saturday the paid holiday is Friday and on Sunday the paid holiday is Monday.

- Labor Day
- New Years Eve
- New Years Day
- Good Friday (Paid Day Off Salaried Staff Only)
- Memorial Day
- Independence Day
- Christmas Eve
- Christmas Day
- Thanksgiving Day
- Day after Thanksgiving

Supervisors- Due to our staffing requirements it is necessary that we have at least one supervisor working (per shift) on holidays. It will be the responsibility of the supervisory staff to equitably determine who is working on each holiday(s); administration can assist, as needed. Supervisors who work on a specified holiday will receive additional day(s) off during the pay period in which the holiday(s) occurs, or be compensated for the additional hours worked.

Hourly Employees

Hourly employees that physically work on a scheduled holiday, listed below, will receive time and one half of their regular pay.

- Labor Day
- New Years Eve
- New Years Day
- Easter Sunday (Hourly Staff Only)
- Memorial Day
- Independence Day
- Christmas Eve
- Christmas Day
- Thanksgiving Day
- Day after Thanksgiving

Holiday time off requests will be granted based on the needs of the St. Louis Center.

Policy:

Paid Personal Time Off (PPTO) provides you with the flexibility to use your time off to meet your personal needs, while recognizing your individual responsibility to manage your paid time off.

You will accumulate a specified amount of PPTO each pay period worked and it is up to you to allocate how you will use it – for vacation, caring for children, school activities, personal business or emergencies. The St. Louis Center does require that you use your available PPTO and Earned Sick Time (EST) during disability or family medical leave (FMLA). However, you may retain up to 40 PPTO hours to be used for a future vacation. For EST please see policy PEP 4.5.2b Earns Sick Time.

All exempt and non-exempt employees who work full-time (36 hours per week) or Part-Time (work at least 25 hours per week) are eligible for PPTO.

Employees are eligible to utilize PPTO upon successful completion of their Professional Development period (first 120 days). The employee still accrues time during this period but cannot use it until they have successfully completed their trial period.

PPTO Accrual Table:

HOURLY EMPLOYEES			
BEGINNING OF PERIOD	END OF PERIOD	MONTHLY ACCRUAL RATE	YEARLY ACCRUAL RATE
Hire Date	End of 1 st Year	3.34 Hours	40 Hours
1 st Anniversary	5 th Anniversary	6.67 Hours	80 Hours
5 th Anniversary	10 th Anniversary	10.00 Hours	120 Hours
10 th Anniversary		13.33 Hours	160 Hours

SALARIED EMPLOYEES			
BEGINNING OF PERIOD	END OF PERIOD	MONTHLY ACCRUAL RATE	YEARLY ACCRUAL RATE
Hire Date	End of 1 st Year	6.67 Hours	80 Hours
1 st Anniversary	2 nd Anniversary	10 Hours	120 Hours
2 nd Anniversary	5 th Anniversary	11.67 Hours	140 Hours
5 th Anniversary	10 th Anniversary	13.33 Hours	160 Hours
10 th Anniversary	20 th Anniversary	15 Hours	180 Hours
20 th Anniversary		16.67 Hours	200 Hours

Based on the above chart, at the end of the Professional Development (first 120 days) period, an employee will have accrued PPTO as follows:

Non-salaried 10.02 Hours
 Salaried 20.00 Hours

PEP 4.5.02a Paid Personal Time Off (PPTO) (Continued)

Procedure:

Accrual and Tracking:

- PPTO hours accrue each month and the rate is based on the amount of hours worked (see schedule below). Employees may “roll-over” accrued PPTO hours from one year to the next, up to 200 hours. Once 200 hours is reached employee does not accrue PPTO hours until they fall below the 200-hour limit. With the implementation of the PPTO Cash Out, the PPTO hours the staff is Cashing Out will be deducted from staff’s accrued PPTO.
- It is the responsibility of each staff member to maintain time in his/her “PPTO bank” for unexpected time off to avoid having unapproved time off. Unapproved time is:
 - 1) Requested time off for which accrued time exists but cannot be approved, or
 - 2) Unplanned time off for which no accrued PPTO is available.
 - 3) Unapproved time off will not be paid and could bring disciplinary action up to and including termination of employment.

PPTO payout at separation from the agency:

- An employee who voluntarily separates from St. Louis Center, gives at least a 2-week notice, AND completes all scheduled shifts during that 2 weeks will be paid out for any remaining PPTO in their bank. It will be included in their final paycheck from SLC
- All accrued PPTO will be forfeited in the event of termination for cause, voluntary termination without requisite notice being given (at least two weeks), and termination with or without cause during an employee’s trial period. If an employee misses a scheduled shift during their two-week resignation period, they will forfeit their PPTO unless good cause is established.

Process for Requesting PPTO:

Requests for PPTO, will be granted or denied according to the staffing needs of the Center unless it is for medical and/or emergency reasons.

The PPTO accrual rate is based on your length of service and is as follows, subject to prorating for hours worked. Rates are based on full-time employment

Process:

Step 1

- Planned time off requests should be submitted to Human Resources (HR) at least **30 days** prior to the first day off requested, utilizing form PEF4.1.03—Time Off Request.
- HR will notate on the Time Off Request form (PEF 4.1.03) the date of receipt.
- HR will verify that the employee has or will have accumulated PPTO to cover the requested time off.
- If the employee does not have the time off, HR will deny the request and give the denied form back to the employee within 72 working hours from the date HR received it.
- A copy of the request will then be given to the shift supervisors, with the notation that the employee has/does not have the accrued time noted. It may be possible to flex an employee’s schedule for that week so that they work 40 hours in a different way. **This is entirely based on the needs of the Center, NOT the needs of the employee.**

PEP 4.5.02a Paid Personal Time Off (PPTO) (Continued)

Step 2:

- Shift supervisors will then approve or deny the request, within 72 hours based on the ability to have coverage for that time. Supervisors will ensure that there is adequate coverage before approving the PPTO request.
- Once the request is approved or denied, a copy of it goes to HR and the staff.

PTO Cash Out:

Effective October 1, 2019 the Center will allow all employees to cash out a portion of their accrued PPTO.

Within the month of the employee's anniversary date of hire, they will be allowed to request (utilizing the PPTO Cash Out Form PEF 4.1.13) a cash out of half of their accrued PPTO up to 80 hours. The PPTO Cash Out check will be issued within two weeks of the requisition. The PPTO Cash Out requisition will be in the form of a manual check issued by the Center's accounting office. This check will be run through payroll with all the State and Federal tax obligations deducted. Insurance premiums and garnishments will not be deducted. Employees will be allowed one cash out per anniversary year.

Employees with anniversary dates January 1, 2019 to September 30, 2019 will be allowed to request this cash out within the month of October 2019. After this initial cash out these employees will be required to follow the requisition policy listed above.

In keeping with the State of Michigan's Earned Sick Time Act (ESTA), the St. Louis Center will establish a Paid Sick Time policy separate from the Paid Time Off (PTO) policy (PEP 4.5.02), renamed Paid Personal Time Off (PPTO). Earned Sick Time (EST) and Paid Personal Time policies will replace the PTO policy, effective February 21, 2025.

All employees of the St. Louis Center (Center) will accrue 1 hour of EST for every 30 hours worked. This accrued paid sick time will not exceed 72 hours annually. Unused sick time can roll over to the following year but will be limited to 72 hours annually.

While EST will accrue from employee's first day of hire, they will have access to this accrued time after 120 days of employment.

The benefit year will be January 1st to December 31st.

EST will be paid out in quarter hour increments.

If an employee does not have enough EST to cover their sick time they may use PPTO to cover the balance, provided they have enough PPTO.

No-call / no-shows will be treated as an unapproved absence. The exception to this would be if the employee had a documented reason that they could not contact the Center as required in policy PEP 4.2.13.

Employees can use EST for themselves as well as family members. EST covers all medical conditions, all mental conditions, violence, sexual assault, meetings at children's schools or facility of care related to the child's health, disability, domestic violence, sexual assault, etc.

It is the Center's policy not to interfere with an employee's right to Earned Sick Time nor will it retaliate against employees utilizing Earned Sick Time. The Center mandates that all employees follow policy PEP 4.2.13-Absence to report and absence. EST is only to be used for medical necessitated time off, as described by the ESTA. If it is determined that an employee is misusing EST (Attempting to use EST for non- medically necessitated absence), disciplinary action will follow, in the form of a coaching, warning, suspension (without pay), and/or termination.

The Center retains the right to request documentation for employees that miss three consecutive days. As per the ESTA, the Center will pay all out-of-pocket expenses the employee incurs to obtain this documentation. This requested documentation, according to ESTA, must be returned to the Center within 15 days of the request. To obtain payment for these out-of-pocket expenses the employee must submit form PEP 4.1.02 with the corresponding receipts.

End of Employment:

All unutilized accrued EST will be forfeited at the end of an employee's employment with the Center.

Reporting Violations of this Act:

Employees that feel the Center has not acted in good faith and is violating this Act have the right to file a complaint with the Michigan Department of Labor and Economic Opportunity. Employees can file a complaint within 3 years from the date of the alleged violation.

In an effort to assist staff with last minute emergencies and obligations when they arise the Center allows staff to apply for a shift trade with another staff experienced in that same department or unit during the same workweek.

Once a schedule is posted, it is the responsibility of the employee to work the hours that they are scheduled. If the employee has a conflict, they may request a trade with another employee. This is accomplished utilizing the "Trade Request" form (PEF 4.1.04). The trade request MUST be for shifts within the same workweek (10:00 pm Fri. to 9:59 pm Fri.) with a staff experienced with that department or unit.

Both employees are to complete the form and it is to be submitted to the Human Resources Director for approval. If the Human Resources Director is not available, the form may be submitted to the Program Director. If the Program Director is not available, the following chain of approval is required.

Supervisors
COO
CEO

Any Trade Requests for the weekends must be submitted no later than 2:00 pm on Friday. Trade requests that are for Monday or Tuesday may be submitted over the weekend to a supervisor for approval.

Trade requests that incur overtime will not be approved unless it is a proven emergency. Trade requests that put an employee in excessive overtime will not be approved.

Completion of the Trade Request form in no way guaranties the trade. A Trade Request form MUST be APPROVED to be valid.

PEP 4.5.04 Bereavement

Updated: 07/16/08

The St. Louis Center agrees to allow full-time employees up to three (3) days paid leave for actual time lost for death or funeral of the following family members:

- Parent
- Spouse
- Child
- Sibling

In case of death of the following, one (1) day with pay will be allowed:

- Father-in-law
- Mother-in law
- Brother-in-law
- Sister-in-law
- Son-in-law
- Daughter-in-law
- Grandchild or Grandparent

For funerals of other relatives, friends or close associates the co-worker may request time against their PTO balance.

All employees who work at least 37.5 hours per week may elect to enroll in the Center's sponsored medical and dental plans, after completion of 120 Professional Development period commencing with the date of hire

St. Louis Center pays 85% of the insurance premium the subscriber (employee) and 70% of dependent coverage. The employee is required to pay the balance for their policy.

All employees, full-time and part-time, are protected while on the job by Workers' Compensation Insurance. This insurance will provide coverage for you if you are injured on the job, suffer an occupational illness at work or have a prolonged absence due to such injury. In case of an accident, no matter how slight, notify the supervisor and fill out an Accident Report immediately. State law determines payments for medical expenses and lost time at work. This insurance also provides death benefits to your dependents (if any) in case of death caused at work; St. Louis Center pays the full cost of this protection. Failure to promptly report an injury may result in loss of benefits.

In accordance with the Leave of Absence policy, upon return to work the employee will be reinstated to his former position or to a comparable position.

Employees experiencing on-the-job injuries must be offered medical attention. The supervisor on duty must complete an Employee Accident Report (PEF 4.2.04) and turn it into the Human Resources Director. If the employee accepts medical attention, the supervisor on duty must complete a Medical Treatment Authorization Form (PEF 4.2.05) and direct injured employee to the Emergency Room at St. Joseph Mercy Hospital, Chelsea.

After a positive 120-day evaluation or successful completion of the Professional Development period, employees are eligible to participate in the following supplemental employee-paid benefit programs:

403 (b) Retirement Plan

This plan is available to all employees who work, on average, 20 hours or more per week. It allows employees to make pre-tax deductions from gross earnings, which are invested in employee-selected mutual funds from the family of American Funds. There are several fund choices available. Investments can be as little as \$12.50 per pay period.

Supplemental Insurance Program

This plan is available to all full-time employees, and allows the employee to purchase supplemental insurance. Insurance options available include personal short-term disability, personal accident expense plan, personal cancer protection plan, voluntary indemnity plan, personal hospital intensive care insurance and life insurance.

If you would like to take advantage of any of these options, or would like additional information, please contact the benefits coordinator in the accounting department.

Continuation of Health Insurance under COBRA

Under the Consolidated Omnibus Budget Reconciliation Act of 1985, better known as COBRA, if an employee terminates employment with the company, the employee is entitled to continue participating in the company's group health plan for a prescribed period of time, usually 18 months. (In certain circumstances, such as an employee's divorce or death, the length of coverage period may be longer for qualified dependents.)

If a former employee chooses to continue group benefits under COBRA, he/she must pay the total applicable premium plus a 2 percent administrative fee. Coverage will cease if the former employee fails to make premium payments as scheduled, becomes covered by another group plan that does not exclude pre-existing conditions or become eligible for Medicare.

For detailed information or questions on COBRA, employees are requested to check with the Human Resources Department.

As a good citizen, St. Louis Center encourages all employees, whenever they are requested to do so, to participate as an active member of a jury. Any employee who is called to, and reports for, jury duty shall be compensated by St. Louis Center for the difference between their regular pay and the jury fee received for each day of jury duty performed on which the employee otherwise would have been scheduled to work, not to exceed eight (8) hours at straight time on any given day or of thirty days in any calendar year.

Such compensation shall be payable only if the employee gives St. Louis Center prior notice of such jury duty call, and presents the proper evidence of performance of jury duty and the amount paid by the court.

Employees who are excused from jury duty and who can work a minimum of two 2 hours of their regular shift on that day are expected to come in and do so.

Time thus paid under this benefit for performance of jury duty will not be calculated as hours worked for the purpose of paying overtime wages.

If you are inducted or enlist in the armed forces of the United States, you are to notify your supervisor so that arrangements can be made to authorize a leave of absence. The leave shall be for a maximum period of four (4) years, except when the employee's period of military service may be involuntarily extended due to an act of war or a declared state of national emergency. In that event the period of military leave shall be extended, in accordance with federal law, until the end of the involuntary extension of the employee's military service. You must apply for a reinstatement within ninety days of your date of discharge or lose your seniority and forfeit your right to return.

Members of the Armed Forces Reserve or National Guard Units who are required to participate in two (2) weeks of annual training will be granted a leave of absence provided proper documentation is provided.

The yearly weekend schedule for training must be submitted to your supervisor as soon as it is received for scheduling purposes.

Family and Medical Leave – Subject to eligibility requirements described below, an employee may receive leave, without salary or wages, up to 12 work weeks during any 12-month period, for the following reasons:

- The birth of a child or to care for a child within the first 12 months after birth
- The placement of a child with the employee for adoption or foster care and to bond with and care for the child. Eligibility for this type of leave expires 12 months after the adoption placement occurs
- To care for an immediate family member who has a serious health condition
- For a serious health condition that makes the employee unable to perform the functions of his/her position
- If the employee experiences a qualifying exigency that arises out of the fact that a spouse, parent or child has been called to or is on active duty as a member of the National Guard or military reserves. This does not apply to active duty served by a member of the regular armed forces.

Military caregiver leave – In addition to the above, an employee who is the spouse, parent, child, or next of kin of a current member of the armed forces (including the regular armed forces) who was injured while on active duty may be eligible for up to 26 weeks of FMLA leave in a 12-month period, including the types of leave listed above.

The employee requesting such leave must provide notice to the Human Resources Director not less than 30 days before the leave if the need for the leave is foreseeable. Documentation of the necessity for the leave is required.

The employee will be required to use any Paid Time Off (PTO) that will have accrued up to the date when the FMLA begins, except as noted in the following paragraphs. The employee will not accrue PTO during the time that FMLA leave is being taken.

There are two exceptions that allow the employee to reserve some PTO during FMLA leave. Any PTO that has been reserved under these exceptions will remain in the time bank and will be available for use after the FMLA leave is completed. Only one of the following two exemptions can be used; they cannot be combined to reserve additional PTO time.

In the first exception, if PTO has been requested and approved through the use of a Time Off Request Form (PEF 1.03), the employee may elect to reserve that pre-approved time up to the maximum PTO time available. If the employee elects not to reserve this time, but use it during the FMLA leave instead, the Time Off Request is cancelled.

In the second exception, the employee may elect to reserve up to 40 hours of PTO. This may include some pre-approved time as described above, and also may include time that has not been pre-approved, but the maximum that can be reserved under this exception is 40 hours.

In order to be eligible for FMLA leave, an employee has to have been employed for at least 12 months and to have worked at least 1,250 hours during the 12-month period.

During the leave, the employee's health benefits will be maintained the same as if the employee had continued working.

PEP 4.5.11 Family Medical Leave Act (FMLA) (Continued)

After returning from leave, the employee will be placed in an equivalent position with equal benefits, pay and other terms and conditions of employment. If the leave was taken because of the employee's own illness or "serious health condition", documentation from the employee's physician that the employee is able to return to work is required.

If an employee fails to return to work from a leave of absence on the agreed day, the employment may be terminated.

St. Louis Center will provide confidential and voluntary assistance to all employees and their family members who may be faced with dynamic challenges of financial concerns, legal issues, alcohol or drug problems, marital problems, illness of a family member, emotional worries, or childcare problems.

Employees and family members can refer themselves to the EAP. The program may be reached 24 hours a day on weekdays and weekends.

EAP counselors are available to meet with employees or family members to assess a problem and develop a plan for resolution. The counselors may suggest a referral to an outside resource, such as a therapist, agency, physician, treatment facility or other professional that would be appropriate to assist in resolving the problem or situation. Where an employee may be in need of information, a referral or suggestion may be made over the telephone. There is no charge for employees or their families to use the services of the EAP.

Employees who need to visit the EAP during regular work hours must use sick, vacation or personal time. If illness is involved, sick, vacation and/or personal time may be used for treatment or rehabilitation on the same basis that it is granted for other health problems.

The EAP counselors will make every effort to coordinate referral for ongoing treatment with the employee's health insurance coverage as well as his/her ability to pay.

When an employee's job performance or attendance is unsatisfactory or there appears to be signs of other problems during the workday, the supervisor should counsel the employee in consultation with the Director of Human Resources or designee with an end toward resolving the situation. If the employee appears to be unable or unwilling to correct the situation, she/he may be referred to the EAP to assist in the resolution of the problem. Depending on the situation, the employee may accept or refuse participation in the EAP. However, there may be situations where continued employment at St. Louis Center may be contingent upon the employee calling the EAP for assistance.

Participation in the Agency's EAP Program does not jeopardize job security or promotional opportunities. However, it does not excuse the employee from following Agency policies and procedures or meeting required standards for satisfactory job performance except where specific accommodations are required by law.

REMINDER: ALL CONTACT BETWEEN AN EMPLOYEE AND THE EAP IS HELD STRICTLY CONFIDENTIAL.

St. Louis Center supports employees' efforts to improve their skills and their job performance through continuing education pertinent to their job duties.

From time to time, St. Louis Center will ask certain employees to attend special seminars or conventions in order to enhance their job duties. Employees may also request specialized training and the Center, at its sole discretion, will sponsor the employee for specialized programs it deems to be appropriate, St. Louis Center will cover the cost of these programs and pay the Employee their standard wage while attending, as long as the program is completed to the satisfaction of the Center.

In addition, the Center includes education reimbursement funds in its budget. These funds will be allocated on a first come/first served basis, as follows:

- In order to be eligible for education reimbursement, the employee must have a minimum of 12 months continuous employment at St. Louis Center prior to application for funds.
- The funds are to be used only as reimbursement for a portion of the costs of formal classroom training in a University, Community College, trade school, or online program that offers accredited programs.
- The coursework must be related to current or anticipated job duties.
- The Employee must request reimbursement in writing before enrolling in the class or program to be eligible for funds, and the request must be given to the St. Louis Center Administrator.
- Reimbursement requests must state the course name, the cost, the school or university, class dates, and how the program relates to the current or anticipated job duties.
- After the coursework has been completed, the Employee must present to St. Louis Center a copy of the certificate of completion or grade transcript, evidencing their successful completion of the coursework. For graded work, Employee must have attained a minimum grade of "B" on the coursework.
- The employee must be active, full-time, and in good standing with St. Louis Center at the completion of the coursework in order to be eligible for reimbursement.
- St. Louis Center will, at its sole discretion, make a determination of the applicability of the coursework and the amount of reimbursement to be made. Note that although it is the intent of St. Louis Center to assist every employee in their education plans, it may not be able to provide any reimbursement for coursework if the coursework is not deemed applicable, or the budget for Education Reimbursement has been fully allocated for the year.

PURPOSE:

The purpose of this section is to provide a uniform policy for all salaried employees in the granting and taking of voluntary furloughs.

As a charitable, non-profit organization, St. Louis Center encourages cost saving measures. One method of realizing savings is through salaried employees taking voluntary, unpaid time off if it is financially possible for that employee to do so. It is the intent of the Center that if an employee elects to take voluntary furloughs according to the procedure described in this policy, this election will not have any adverse effect on employment decisions by St Louis Center regarding the employee.

DEFINITION:

A Voluntary Furlough is defined as an employee election to take time (whole days only) off without pay, with the following provisions:

- Pay per day will be defined as the employee's annual salary divided by 260.
- Benefits and seniority will continue to accrue during the furlough days.
- A maximum of two (2) days per month can be taken.
- A furlough will not be permitted if a vital job function is negatively affected.
- Payroll deductions for benefits will continue during the furlough days
- The employee must not perform any St. Louis Center related work during the furlough days.

PROCEDURE:

Procedure for taking voluntary furlough time:

- A Voluntary Furlough request (PEF 4.1.12) must be completed at least 2 weeks in advance
- Furlough days must be approved by the HR Director

Confidentiality is the preservation of personal and secret information concerning the resident, which is disclosed in the professional relationship. Accordingly, confidentiality is based upon the basic natural rights of the resident to emotional, social and intellectual growth and development. The observance of confidentiality is, therefore, an ethical obligation of staff and is necessary for effective residential services. The resident's right to confidentiality, however, is not an absolute right. Moreover, the resident's secret is often shared with other professional persons within the center and other agencies. The obligation to maintain the resident's confidentiality then binds them all equally.

Guidelines in the Confidential Nature of Records and the Individual's Right to Know:

All information and records on residents presently or formerly of the Center shall be treated as confidential and is only to be disclosed or released in the following circumstances:

1. The resident identified or his/her legal guardian, if any, or if he/she is a minor, his/her parent/legal guardian shall consent in writing.
2. Disclosure or release is necessary for purposes directly connected with Administration of any service with the Center. Accordingly, it is important to note that the Center's Social Worker limit the gathering and recording of information about a resident to that information which is essential to the provision of service.

Confidentiality must be balanced in accordance with competing interests of the resident; to the legitimate needs of the Center and the rights of third parties. A resident's Right to Know is formally acknowledged by the fact that a resident presently or formally resided or resides at the Center is entitled to inspect or copy his/her own records as they may relate to eligibility for receipt of benefits or assistance. Any other information or records shall be made available to the extent that the resident makes a reasonable demonstration of the need to know. A denial should be accompanied by a verbal explanation to the resident and reasons set forth in writing and made part of the resident's records.

Confidentiality shall also yield to the rights of third parties represented in certain legal claims, court orders and subpoenas.

The individual or agency shall honor court orders and subpoenas directing the disclosure or release of records. Any person against whom a claim is made by a resident for compensation or damages for personal injuries or death, or his/her insurance carrier, may without the consent of the resident, examine or copy his/her medical records. Proof should be required of the existence of the claim, as well as proof that the person requesting the records is authorized to do so. The records should be reviewed prior to release for the purpose of deleting references to any other residents.

PEP 4.6.01 Confidentiality (Continued)

St. Louis Center provides access to, and/or photocopies of, relevant to any individual, agency or organization with legitimate professional interest **ONLY WITH THE WRITTEN CONSENT OF THE PARENT/GUARDIAN OR ADULT RESIDENT**. Exceptions to the preceding statement shall be:

1. Other professional staff members employed by St. Louis Center or contracted for special services agencies.
2. Authorized representatives of government or educational authority, as defined by law.
3. Application for a resident for receipt of financial aid.
4. Requests by judicial order, or subpoena.
5. Organizations conducting research or studies – if these studies will be conducted in such a manner as will permit the personal identification of residents or their parents. Such research must be approved in advance by Administration.
6. Accrediting agencies in order to carry out their accrediting functions.
7. To appropriate persons in connection with an emergency (knowledge of such information is necessary to protect the health or safety of a resident or other persons). Supervision must consider the seriousness of the threat, the need for such records to meet the emergency, whether the person receiving the record is in a position to deal with the emergency, and the extent to which time is of essence in dealing with the emergency.

The Treatment Plan Conference process rests on sharing information among staff members so that all are kept current about the residents changing needs and functioning. The resident and his/her representatives are treated as members of staff, so nearly everything is done in their presence, in their view. It is common in the T.P.C. process to share reports and impressions with the involved parties, however if the social worker is in doubt, then the residents or guardian's permission should be obtained.

The T.P.C. process is similar to a case review held on a weekly basis for Adults and Children.

In being asked information about residents, staff should always ask themselves: Am I dealing with an authorized person? This means a person who has a need to know the particular information and would it be used in the best interest of the resident. If you cannot answer the question, it is usually good practice to ask the inquirer to put the request in writing, and the Social Worker has more time to discover the appropriateness of the request and to obtain the necessary permission, if necessary. Information concerning residents/staff is not to be discussed outside the Center. Remember that you are placed in a position of trust in regard to information regarding the residents, their families, and staff of St. Louis Center. Our basic rule/policy is that information concerning any resident/staff should **NOT** be released, whether written, over the phone/fax, to any individual or agency without the approval of St. Louis Center Administrator or his designee.

PEP 4.6.02 Employee's Children in the Workplace Updated: 04/17/08

If an employee's child must be brought into work for reasons of personal or work related business, during scheduled work hours, another non-working adult responsible for their care must accompany your child. The length of visits must be minimized and must not interfere with employees' job duties and responsibilities.

PEP 4.6.03 Personal Appearance Updated: 05/16/22

Personal appearance reflects the Center's standards and gives external evidence of the employee's concern and interest for his/her job. Professional appearance and proper personal hygiene is a job prerequisite.

Many of our residents model themselves after the staff. We are aware of current trends but please remember your residents will copy good/bad, appropriate/inappropriate dress and grooming habits. Setting a good model will help the residents in their future goals.

Clothing shall be of a type that is appropriate for the work involved: style, length, safety, etc. Appropriate footwear is required to be worn by staff. The following general guidelines apply to all men and women:

- No opened toe shoes
- No "flip flop" style footwear of any kind. Must have a strap or enclosed heel. Closed toe sling back shoes are acceptable. **"Croc" style shoes must have the strap across the heel, and may not have holes in the top.**
- No sleeveless, halter and low cut tops of any type. Cleavage, mid-drift and undergarments should not be exposed.
- Shorts and skirts must reach the knee when standing up.
- No slippers or pajamas of any kind.
- No torn, ripped or stained clothing. That includes jeans that are pre-ripped when purchased.
- No shorts can be worn to chapel.
- Tattoos should be covered up to the extent possible
- If leggings, yoga pants, or "skinny jeans" are worn, the top must come down to the end of the middle finger when the hands are held to the sides.

It is recommended that direct care staff wear their hair (if long enough) pulled back for safety reasons, i.e. pulling of hair by resident, etc. It is mandatory for the kitchen staff to pull their hair back (if long enough).

It is also recommended that staff do not wear excessive or expensive/valuable items such as jewelry/watch to St. Louis Center. The Center is not responsible for broken or lost accessories of staff.

If an employee comes to work violating the policy he/she will be asked to punch out and change his/her appearance to meet policy guidelines and punch in upon returning to work. Employees failing to return to work will receive a written warning for an unexcused absence and policy violation.

Decisions regarding the interpretation of the policies guidelines are based on the ability or inability of the employee to perform his/her job duties and meet the prerequisites of professional appearance and proper hygiene, to the extent it does not violate employee's civil rights.

PEP 4.6.04 Expenses Updated: 07/28/10

All purchases on behalf of the Center must have the prior approval of the Administration. Any purchase made without such approval will not be honored or reimbursed.

Prior approval may be documented by using Form PEF 4.1.02, Request for Funds.

PEP 4.6.05 Telephone Calls Updated: 06/30/17

All employees shall be limited to emergency incoming personal phone calls. All cellular phones and pagers are also restricted to emergency use.

Personal matters, visitations, telephone calls, etc. shall not interfere with the employee's working hours. Those employees who may have a telephone in their office shall be responsible for their telephone.

If someone needs to reach you at work due to an emergency, they can do so by calling the Center.

St. Louis Center has purchased cellular phones for use in vehicles. These phones are charged with a certain number of minutes, and when those minutes expire the phones will not work until the minutes are recharged. A phone log is also created when these phones are used. Accordingly, these phones are to be used for St. Louis Center business only.

When a St. Louis Center vehicle is used on organizational business, a cellular must be signed out for use in that vehicle. Phones are not assigned for specific vehicles, but a phone should be signed in or out whenever vehicle keys are picked up or dropped off. If numerous trips are to be made during the course of the day and the keys will remain in possession of the driver, then the same cellular can be utilized throughout the same time.

Note that it is the policy of St. Louis Center that cell phones are not to be used while driving. If organizational business or an emergency arises, the driver should pull off to a safe location if at all possible and make the call. Safety is the first priority.

PEP 4.6.06 Smoking Updated: 03/18/24

For the safety and health of our residents and staff as well as abiding by State and County laws, St. Louis Center is a non-smoking tobacco free campus.

Smoking, chew, snuff, dip, vaping, etc. in any form is not allowed on the St. Louis Center's property or in any of its buildings. This includes but not limited to traditional tobacco products, THC, e-cigarettes, Bidis, vaping, etc.

In addition, all smoking, chew, snuff, dip, vaping etc. products and paraphernalia are not allowed in any building on the St. Louis Center campus. Please make sure to leave all these items in your vehicle.

Because our residents and some staff can be sensitive to strong odors, like with perfumes and colognes we ask that you do not come to work with the residual odor from the above-mentioned products on your person. Some of these odors will trigger behavior issues.

Administration reserves the right to send staff home to resolve the issue of them emanating strong odors.

Continued violation of this policy will result in the following corrective sequential actions:

- Coaching
- Personal Improvement Plan
- Written Warning
- Written Warning with suspension
- Termination

PEP 4.6.07 Meals Updated: 06/30/17

Residents model their behavior after staff examples. Since many of our residents have dietary restrictions, staff should avoid consuming foods different than the resident's meals while in their presence.

It is strongly recommended that staff avoid eating fast food, snacks, or food brought from outside the Center in front of residents unless there is enough for everyone.

It is also appropriate for staff to eat at the same time as residents to teach appropriate manners/etiquette.

If staff, for whatever reason, brings in outside food they must eat it in the training/break room (Not in front of residents). Staff must punch out for this meal break.

PEP 4.6.08 Continued Training and Education Updated: 04/17/08

Employees are expected to attend in-service training programs, conferences, meetings and study courses as mandated by licensing requirement.

Permission from the Administration shall be required for any program(s) presented off-grounds during the regular working hours.

PEP 4.6.09 Communication / Grievances Updated: 04/10/09

With the type of services that St. Louis Center provides, employees may become discouraged, worried or upset, either about work or some outside problems and this limits their ability to perform at their peak of efficiency. In addition, employees who are distracted are more likely to make mistakes.

Employees are encouraged to seek assistance through the Employee Assistance Program for issues that cannot be resolved through the St. Louis Center chain of command or for issues of a personal and confidential manner.

St. Louis Center encourages suggestions. Employee suggestions, problems or complaints can offer an improved workplace. It may be a method to improve productivity, a solution to reduce a resident's behavior or a clarification of a policy. For comments or suggestions, employees should utilize a Problem/Solution (PEF 4.1.11), which can be turned in to a supervisor or administrator. It is the option of the employee whether they wish to sign off on these forms or remain anonymous, but misuse of this communication tool will not be tolerated.

If an employee experiences a specific situation or problematical working condition, this should be considered a grievance or complaint, and should be filed using a Grievance Form (PEF 4.1.10). A grievance cannot be made anonymously.

In filing a grievance, the chain of command should be followed. The matter is first brought to the employee's immediate supervisor, and the following procedure will be followed:

ACTION: Grievances and complaints should first be made to the employee's immediate supervisor verbally and using the Grievance Form. If the grievance or complaint has to do with a possible resident's rights violation, Resident Complaint Procedures (RSP 6.3.06) should also be followed. A copy can be made for the employee's use, but there should be no additional copies made.

INVESTIGATION: Your immediate supervisor will research your grievance, etc. responding verbally and in writing within 5 working days of the initial complaint.

APPEAL PROCESS: If you feel that your immediate supervisor did not, cannot or will not consider your suggestions, grievances, or complaints, you may at that time appeal to higher management with notification to your immediate supervisor of your intentions to appeal their decisions/directives.

APPEAL CHAIN-OF-COMMAND

1. Administrator
2. Executive Board Committee
3. Bureau of Regulatory Services

PEP 4.6.10 Acceptance of Gifts and Loans Updated: 06/04/08

Depending on their job duties, St. Louis Center employees make many business decisions that may affect our finances, operations, working conditions, and our ability to provide high quality services to our residents. These decisions must be made on the basis of merit, and for the benefit of the Center and our residents.

Acceptance of gifts in the form of in-kind services, items, money, or other forms of remuneration, is not allowed to the extent that those gifts may affect the ability to make decisions that support the Center and its residents. Employees are strictly forbidden to solicit personal gifts of any form.

Employees are expected to use their judgment if a gift is offered. If an employee is offered a substantial gift, they should report that offer immediately to the Administration for determination as to whether acceptance would violate this principle. Failure to report such an offer, or acceptance of a substantial gift may subject the employee to disciplinary action.

Employees are not permitted to borrow money from residents, family members of residents, or other employees under any circumstances.

St. Louis Center entrusts residents funds to certain designated employees for control and distribution according to the needs and instructions of the residents. Employees are not to commingle, borrow or pledge funds of a resident. Michigan law makes it a misdemeanor, with the possibility of 2 years in jail, a \$25,000 fine, or both, if convicted of such an offense.

PEP 4.6.11 Pornography Updated: 06/05/08

St. Louis Center does not allow staff, residents, or visitors to bring or show pornographic material on our campus, including but not limited to T.V., videos, tapes, 900 area codes, books, magazines and photos or access through Internet or email. Such material can lead to sexual involvement/inappropriate behaviors and contact with such material may not only be offensive but could be construed as a form of harassment and a violation of the dignity of our residents.

Violation of this restriction by staff will be treated seriously and could provide grounds for disciplinary action leading to dismissal.

Definitions

Pornography is understood by St. Louis Center to be material of an explicit sexual nature, which may be in the form of visual texts, including photographs, or moving images in analogue or digital format, including computer file formats, or written texts.

PEP 4.6.12 Vehicle Use Updated: 03/20/12

1. Employees driving vehicles to conduct St. Louis Center business must possess a valid driver's license and be approved by St. Louis Center.
2. If a St. Louis Center vehicle is to be used, it must be checked out in the front office and gasoline from the St. Louis Center pumps should be used unless it is impractical to do so.
3. If an employee uses a St. Louis Center vehicle to transport residents, PRP 5.2.4 Transportation Guidelines must be followed.
4. Agency vehicles are not to be used for personal business, unless specific authorization is given by management. When staff take a resident on an outing, they are only authorized to take the resident the specific place approved by supervisor. Any deviation from the plans must be called into a supervisor for permission.
5. An employee may use their personal vehicle for St. Louis Center business only if such use is approved in advance by the Administration.
6. The Administration may specifically request that an employee use their own vehicle in specific circumstances. Examples may include, but are not limited to, taking a test through the employee drug-screening program, or going to a seminar or convention.
7. If the Administration approves use of a personal vehicle for St. Louis Center business or requests that any employee use their personal vehicle, mileage will be reimbursed at the federal reimbursement rate that is current at the time of the approval.
8. The number of miles to be reimbursed will be the lesser of: a) round trip mileage from the employee's home to the destination site, and b) round trip mileage from St. Louis Center to the destination site.
9. Mileage claims are submitted to the finance department using the mileage reimbursement form provided by that department.

ST LOUIS CENTER
Internet and Email Policy

A. Introduction

Computer information systems and networks are an increasingly important part of the work that St. Louis Center does. The company has invested much staff time and computer equipment to create these systems. The enclosed policies and directives have been established in order to:

- Protect this investment.
- Safeguard the information contained within these systems.
- Reduce business and legal risk.
- Protect the good name of the organization.

B. Violations

Because of the sensitive nature of the information we use, violations may result in disciplinary action in accordance with company policy. Staff must respect the sensitivity of the information they handle and the privacy of fellow staff members as well as the residents we serve.

C. The Internet and e-mail

St. Louis Center provides Internet and email access to certain employees based on their need to access specific information, file reports, or correspond via email with agencies or other business contacts.

Acceptable use

Employees using the Internet are representing the St. Louis Center. Employees are responsible for ensuring that the Internet is used in an effective, ethical, and lawful manner.

Examples of acceptable use are:

- Using Web browsers to obtain agency information from commercial Web sites.
- Accessing databases for information as needed.
- Using e-mail for agency, donor or parent contacts.

Unacceptable use

Employees must not use the Internet for purposes that are illegal, unethical, harmful to the company, or nonproductive. Examples of unacceptable use are:

- Sending or forwarding chain e-mail, i.e., messages containing instructions to forward the message to others.
- “Spamming” with e-mail, i.e., sending the same message to more than 10 recipients or more than one distribution list.
- Conducting a personal business using company resources.
- Transmitting any content that is offensive, harassing, or fraudulent.
- Downloading or transmitting copyrighted material without permission.
- Transmitting confidential employee or resident information
- Neglecting work responsibilities because of excessive non-necessary Internet time.

Downloads

File downloads from the Internet are not permitted unless specifically authorized as part of your responsibilities.

PEP 4.6.13 Computer and Internet Policy (Continued)

Accessibility

Messages created, sent, or retrieved over the Internet are not secure. Employees must be aware that electronic communications, including text and images, can be disclosed to law enforcement or other third parties without prior consent of the sender or the receiver. **This means do not put anything into your e-mail messages that you wouldn't want to put on a post card or be required to explain in a court of law.**

D. Computer viruses

Computer viruses are programs designed to make unauthorized changes to programs and data. Therefore, viruses can cause destruction of computer resources and files. Employees are responsible to monitor that their antivirus software is working, and if it is not, to notify the administration. Employees must also notify the administration of any unusual computer behavior that might indicate a virus may be present.

E. Access codes and passwords

The confidentiality and integrity of data stored on company computer systems must be protected by access controls to ensure that only authorized employees have access. This access shall be restricted to only those capabilities that are appropriate to each employee's job duties.

Each employee:

- Shall be responsible for all computer transactions that are made with his/her User ID and will password protect confidential files and areas as necessary.
- Shall not disclose passwords to others. Passwords must be changed immediately if it is suspected that they may have become known to others. Passwords should not be recorded where they may be easily obtained.
- Should use passwords that will not be easily guessed by others.
- Should log out when leaving a workstation for an extended period.

F. Physical security

It is company policy to protect computer hardware, software, data, and documentation from misuse, theft, unauthorized access, and environmental hazards.

Employee responsibilities

The directives below apply to all employees:

- Diskettes or CDs should be stored out of sight when not in use. If they contain highly sensitive or confidential data, they must be locked up.
- Diskettes or CDs should be kept away from environmental hazards such as heat, direct sunlight, and magnetic fields.
- Critical computer equipment, e.g., file servers, must be protected by an uninterruptible power supply (UPS). Other computer equipment should be protected by a surge suppressor.
- Environmental hazards to hardware such as food, smoke, liquids, high or low humidity, and extreme heat or cold should be avoided.
- Employees should contact the IT manager for equipment installations, disconnections, modifications, and relocations.
- Employees should exercise care to safeguard the valuable electronic equipment assigned to them. Employees who neglect this duty may be accountable for any loss or damage that may result.

PEP 4.6.13 Computer and Internet Policy (Continued)

G. Copyrights and license agreements

It is the St. Louis Center policy to comply with all laws regarding intellectual property.

1. Social Media For Professional Use

- St. Louis Center supports the use of social media as one of many possible ways to communicate with citizens, customers and stakeholders.
- The use of social media by staff for work purposes is authorized and supervised at the department level.
- All content published using social media must be aligned with the mission and vision of St. Louis Center.
- Protected information including, but not limited to, health information governed by state and federal confidentiality laws shall not be posted or referenced on social media.
- St. Louis Center shall have procedures and standards that further define use of Internet, email and social media.

2. For Personal Use

- The use of personal social media by St. Louis Center employees during working hours is prohibited.
- Personal social media accounts shall not be created using St. Louis Center email addresses.
- Managers and supervisors may supervise staff on issues of use of social media similar to supervising use of any other St. Louis Center equipment for personal purposes.

PEP 4.6.15 Salary Exempt Status Updated: 04/17/08

St. Louis Center employees' who are "exempt" from overtime, as stipulated by the FLSA, are paid for the job they do and are expected to work, as necessary, until the job is finished. This may be beyond the regular workweek, in the evenings or on weekends. These employees do not receive 1.5 times for extra hours worked beyond 40 hours per workweek.

It is expected that a full-time salary exempt employee is actually working at least 40 hours per workweek. All employees at the St. Louis Center, including salary exempt, must utilize the time clock system to keep track of their hours.

Exempt employees are expected to take responsibility for their own schedules and can, on occasion, take time off from work in order to meet personal needs. This additional time off from work must be approved in advance by the CEO or COO and must not conflict with office operations.

PEP 4.6.16 Outside Investigations Updated: 06/05/08

Outside entities may occasionally contact St. Louis Center for specific information about our operations, staff, or residents. These entities may represent themselves as reporters, process servers with subpoenas, police officer with search warrants or conducting investigations, private detectives seeking information, or other legal actions.

St. Louis Center is committed to protecting our personnel when actions of the organization are being put under scrutiny, and will provide assistance during any investigative process. Administration will handle outside investigations on a case-by-case basis. Unless an employee is given specific instructions from the St. Louis Center administration, they should not to provide information about other staff members, residents, policies and procedures, legal actions, contractual relationships, or any other aspect of their employment with St. Louis Center to any outside entity.

PEP 4.6.17 Electronic Data Management Updated: 09/11/17

St. Louis Center shall use an Electronic Data Management System (EDMS) for documentation and file management.

Definitions (for this policy)

Agency or Company: St. Louis Center

Provider Administrator: St. Louis Center Management/Administrative staff responsible for overseeing and managing the Electronic Data Management System & Microsoft applications implemented by St. Louis Center.

Protected Health Information (PHI): Individually identifiable health information that is transmitted by electronic media, maintained in any electronic media, or transmitted or maintained in any other form or medium.

Users: A currently employed St. Louis Center Staff.

Purpose

To comply with CMS Electronic Signature Guidance, Health Insurance Portability & Accountability Act of 1996 (HIPAA), Uniform Electronic Transactions Act (UETA) and E-SIGN (The Electronic Signatures in Global and National Commerce Act), compliance guidelines and requirements for the use and storage of electronic data records for the agency. The agency's electronic data records will be made available via a special access account for review and will be retrievable for authorized state survey team members, auditors and investigative staff. All modules of electronic data including, but not limited to, stand alone computers, laptops, tablets, with or without internet capability will be made available for review, including activity tracking, secure communications, archive data, management reports, GER (Incident Reports), behavior data, eMAR, personal finance, IP and ISP Data and health tracking, billing information, staff training records, T-Log notes, periodic reports, etc.

St Louis Center staff will adhere to the following when working with electronic data:

- Protected Health Information (PHI) of individuals should always be communicated securely, for example using secure HTTPS, a cryptographically secured protocol and interfaces.
- Staff will be instructed in the authorized use of PHI for the individuals in their care and not to discuss confidential information outside of their place of employment. Staff will receive HIPAA training within the first 30 days.
- Users will not save electronic files containing PHI or files exported from St. Louis Center's EDMS to Excel or PDF in a shared computer, on personal devices or in any other form without express permission to do so.
- Users should not share their personal login information with others.
- Users should not write down their login information on paper or save them in an electronic file that can be accessed by other users.
- St. Louis Center has established a password policy for its users.

PEP 4.6.17 Electronic Data Management (Continued)

- While accessing the system from a shared computer or within the St. Louis Center property, user should not leave the computer screen unattended, and delete all information from those computers, including clearing caches cookies and temporary files.
- All agency employees are advised to not store data on agency or personal computers, laptops or other storage devices; the files containing PHI should be deleted after the work has been completed and saved in St. Louis Center's EDMS.
- Management Reports, Behavior Information, Nursing, Summary Reports and other reports containing PHI may be printed or copied for use as required for agency business, as provided in state or federal regulation and agency policy.

Provider administrators will be trained by St. Louis Center's EDMS' contractor staff in the use and management of electronic data within the secure database. These selected Provider Administrators are the persons responsible for proper assignment of access privileges to users, setting up password policies and activating/deactivating user accounts. They will be required to have a clear understanding and sound knowledge about the various application capabilities and the underlying HIPAA regulations and E-sign policy. These include:

Access Control: Administrators are responsible for assigning proper roles and privileges to users to grant them access to the system while at the same time restricting that access only to the information they are authorized to see. Provider Administrators are also responsible for updating these access privileges assigned to users in accordance with their changing job responsibility and authority.

Implement Password Policy: Provider Administrators are able to set up and implement a suitable password policy for the agency by specifying a number of properties including the minimum length, number of letters, digits, and special characters required and the policy regarding the expiration period of passwords. The Agency shall not record, inquire of any employee or assign passwords to employees. The agency may reset a temporary password at the request individual employee who has been locked out of the system. The employee will be prompted and requested to reset their temporary password by the Provider Administrator?

Managing User Accounts: Provider Administrators are responsible for creating and activating St. Louis Center's EDMS accounts for employees and providing them with the login information they need to access these accounts. Provider Administrators need to instruct new account holders to choose a new password for themselves once they start using the system. If a user forgets his password, login name or provider code, they will have to go to their respective Provider Administrators to collect this information (St. Louis Center's EDMS Customer Support will not alter or supply users' log information, except for agency Provider Administrators.) Providers Administrators may also disable an employee's user account when they are leaving the organization, on extended leave, or administrative leave.

Assignment of Roles and Caseloads: St. Louis Center's EDMS implements a multilevel access mechanism based on roles and individuals. Provider Administrators can specify the level of access available to a particular user of the system and grant permission accordingly. This only allows users to have access to information they are authorized to work with. Provider Administrators shall assign each User a specific list of roles for

PEP 4.6.17 Electronic Data Management (Continued)

access privileges as well as access to a specific caseload(s) of individuals based upon their need to know, access and level of responsibility for those individuals.

Access to St. Louis Center's EDMS during Non-Work hours: All Non-Exempt and Direct Care Employees shall be instructed not to access St. Louis Center's EDMS during non-scheduled work hours. Employees are not required by the agency **and are not authorized** to access the Web-Based Electronic Data Management System during non-scheduled work hours.

Message Integrity: All communications between end users browser and the St. Louis Center's Electronic Data Management System's Application that is carried over HTTPS, is a cryptographically secured protocol. No third party can modify the data transferred. No user can modify the data stored in this system, without going through the application. The data is stored in multiple secured locations, guaranteeing its safety from natural and manmade disasters.

Secure Sockets Layer (SSL): SSL is the international standard used to ensure protection of data during transmission over the Internet. SSL provides endpoint authentication and communications privacy over the Internet using cryptography. The protocols allow client/server applications to communicate in a way that is designed to prevent eavesdropping, tampering and message forgery. Called communications from the user to the St. Louis Center's Electronic Data Management System's Application that is carried over HTTPS use SSL, and thus are secure during transmission

Non-Repudiation: As the data is stored securely, no user can access the data without proper privilege and audit trail (activity tracking), no user can deny the association of his/her identity with a document stored in St. Louis Center's EDMS

User Authentication: All users, including St. Louis Center's EDMS staff, must authenticate with a unique login name and a secret password to gain access to the system.

Session Expiration: St. Louis Center's EDMS has a session expiration mechanism such that a session expires when a user has not used the system (i.e., has not hit any key on the keyboard or clicked on a button on the form) for half an hour, before starting to enter information again. The system displays a countdown message for 5 minutes before the session actually expires. If the user wants to resume work, they can cancel the expiration by simply clicking a button on the countdown message. This is a security feature that prevents unauthorized people from using your login in cases where users may have left the program without logging out.

Altering over Non-Secure Media. One challenge to security is the use of non-secure internet, such as email, text messaging, and paging. The St. Louis Center's EDMS system assures that no Protected Health Information is transmitted over these media, while still providing a flexible alerting mechanism. For example, users may configure their notification properties to receive email or text messages that would let them know about critical incident reports being filed without revealing any Protected Health Information. When secure media, such as SComm and FirstPage, are used for alerting, the system allows Protected Health Information, such as the individual's name, to be included.

Tracking User Activities: Provider Administrators are able to track all users' activities by using the St. Louis Center's EDMS Activity Tracking module. The module is equipped with the capability to record and report on activities of all user accounts

PEP 4.6.17 Electronic Data Management (Continued)

within an agency. The Activity Tracker shall record all Users accessing the system, time, date, login name, User Name, IP address used to access the system, all activity, including viewing of information, creation or modification of any and all data or records. Provider Administrators with this role or option can detect any attempts to breach the system security (failed login attempts) and other misuse. The St. Louis Center's EDMS system is monitored by security systems and staff for unusual activity within the accounts. St. Louis Center's EDM'S contract provider will provide training and support materials for Provider Administrators to learn about these and other HIPAA compliant St. Louis Center's EDMS features, as needed.

Staff Training: The agency will provide training of all new employees in the use of St. Louis Center's EDMS, methods and requirements for documentation and the use of searches, summary data and reports for all modules. Online training, "walkabouts", automated training, webinars, a User Guide, online help, Feedback, FAQs, etc., are available for all users.

Clear to Zero: All employees are required to clear the FirstPage or Dashboard, of their Therap account each day at the beginning of their shift of all numbers, which are notifications of new information about the individuals in their care or important communications from the agency, DDS or others. The employee's FirstPage or Dashboard can be cleared by opening and reading all information contained in these links. The employee is responsible for all information contained in these communications and the St. Louis Center's EDMS does record that these items that have been viewed and acknowledged by the employee.

Printable Format or Record Access: All information contained with The Electronic Data Management System is printable and can be reproduced upon request for any Quality Monitor, Licensing Staff, Survey Team, Auditor or Guardian upon request.

Readily Accessible: The Electronic Data Management System shall be accessible to any authorized person including licensing staff, investigators, surveyors, auditors and monitors upon request, twenty-four hours per day. The Provider Administrator of the agency can provide immediate and complete access to the electronic records of all individuals to an authorized person, through online access and remote approval. The list of Provider Administrators for the agency is available to all employees under their "My Account" section located on their FirstPage or Dashboard.

Deletion of Information: The Electronic Data Management System shall maintain all data submitted by the Users, in the original form, and as approved, updated or modified, all versions of reports, data and information shall be archived and retrievable. Any sensitive or confidential documents (Resident Identifying Information, Abuse, Neglect, Unlawful Acts, etc.) shall be available upon request by authorized persons to review and may be accessed online with restricted access. Records and data shall not be deleted from the system; any such requests for the deletion of any information shall be recorded and accessible to auditors, investigators and appropriate authorities. This information shall be recorded in the Provider Administrators' Secure Communications, and shall contain a written explanation of the request, with identification of the User making the request, Date and Time, data information, and Form ID number.

Electronic Communications Systems: Computer facilities owned, leased or otherwise maintained by the Company are intended for use by qualified and authorized personnel and only in the conduct of official business.

PEP 4.6.17 Electronic Data Management (Continued)

It is important that every employee understand that all electronic communication systems used while at work, including but not limited to the Internet, telephone systems and e-mail, as well as all information transmitted, received or stored in these systems are the property of the Company. Thus, the Company needs to be able to access and/or disclose any information in the electronic communication system, even those protected by your personal password, at any time, with or without notice to the employee. Employees have no expectation of privacy in connection with the use of these systems or the transmission, receipt or storage of information in such systems. Therefore, employees should not use these electronic communication systems to store or transmit any information that they do not want management and/or other employees to see, hear or read.

Employee's communication through these electronic communication systems must always be handled in a professional and ethical manner since it reflects on the Company, our customers, prospects, competitors, suppliers and other employers. Nothing should be communicated through the electronic communication system that would be inappropriate in any other medium or form of business communication. Specifically, the electronic communications systems are not to be used in a way that may be disruptive, illegal, offensive to others or harmful to morale. Each St. Louis Center employee is responsible for abiding by copyright and trade secret laws in the use and transmission of information.

The use of derogatory, inappropriate, discriminatory and/or non-professional communication, including but not limited to slander, harassment of any type (sexual, racial, etc.) or obscenity is prohibited. Similarly, there is to be no display or transmission of sexually explicit images, messages or cartoons.

All data contained in this system is Company property and should not be disclosed, accessed or manipulated for any purposes other than official business. No attempt should be made to override or deceive any security precautions assigned to the computer system. Employees are required to keep their passwords confidential, change them on a regular basis and to comply with all security procedures. The unauthorized use of a password, or the unauthorized access to or retrieval of information transmitted or stored in the electronic communication system is strictly prohibited.

PEP 4.6.18 Electronic Mail Updated: 09/11/17

St. Louis Center provides electronic mail (“email”) through applications to support communications among and between staff, other agencies, board members, incorporators and vendors. This Policy clarifies the applicability of State and Federal laws and other St. Louis Center policies to email.

Privacy and Confidentiality:

St. Louis Center will exercise reasonable efforts to maintain the integrity and effective operation of its email system(s), but employees should in no way regard email as a secure medium for the communication of sensitive or confidential information. Because of the nature of electronic communication, St. Louis Center cannot assure the privacy nor confidentiality of information sent via e-mail. Thus, email messages should not identify the full names of program participants or disclose any information that is protected under the HIPAA privacy law.

St. Louis Center user accounts are the property of St. Louis Center and are to be used exclusively for St. Louis Center business. All communications transmitted by, received from, created and/or stored on St. Louis Center’s server are St. Louis Center property. Therefore, employees have no right of privacy with respect to such email. This applies not only to work-related email, but also personal email accounts accessed through St. Louis Center’s computer system.

St. Louis Center may deny access to its email system(s) and may inspect, monitor, or disclose email without notice or consent when: (a) required by law; (b) there is reason to believe that violations of law or of St. Louis Center’s policies have taken place; or (c) when required for the orderly conduct of St. Louis Center’s operations.

Emails are considered “documents” and must be retained consistent with St. Louis Center’s Document Retention Policy (see existing policy ADP 1.1.5). Emails may be disclosed as part of an internal or external investigation or litigation. Deleting an email from your email account does not erase it from St. Louis Center’s computer system; therefore, any email message may become a document that is produced as part of an investigation or litigation.

Duty of Care in Drafting:

All communications from St. Louis Center impacts our image. Thus, employees should not use language, fonts or graphics in emails that would be considered beyond normal standards of professional conduct and personal courtesy. Emails should use proper grammar and be spell-checked.

Prohibited Purposes:

St. Louis Center’s email system(s) may not be used for unlawful activities or for commercial purposes that are not directly related to St. Louis Center’s mission or otherwise authorized. Other prohibited uses of email include, but are not limited to:

- Commercial advertisement, solicitations, or promotions;
- Destructive programs, such as viruses;
- Sending copies of documents in violation of copyright laws;
- Use of email to harass, intimidate, defame or discriminate against others or to interfere with the ability of others to conduct St. Louis Center business;
- Use of email for any purpose restricted or prohibited by laws or St. Louis Center policies;
- Constructing an email communication so it appears to be from someone else;
- Unauthorized access to electronic mail or breach of any security measures on any email system, or unauthorized interception of any electronic mail transmissions.

Violations of this policy may result in disciplinary action up to and including discharge.

PEP 4.6.19 Electronic Data Management Access Updated: 9/11/17

St. Louis Center uses a web-based service that provides for the documentation and communication needs of St. Louis Center in providing support to people with developmental disabilities. It offers an easy and efficient alternative to the immense amount of paper work that was previously done by hand.

Permitted Use of St. Louis Center's Electronic Data Management System (EDMS) computer network: The computer network is the property of St. Louis Center's contract service provider and the equipment and information is the property of St. Louis Center and is to be used for legitimate business purposes. St. Louis Center staff are provided access to the computer network to assist them in the performance of their jobs. Additionally, certain employees may also be provided with access to the Internet through the computer network. All employees have a responsibility to use St. Louis Center's computer resources, Electronic Data Management System (EDMS) in a professional, lawful and ethical manner. Abuse of the computer network or the Internet, may result in disciplinary action, including possible termination, and civil and/or criminal liability.

Procedures

The following responsibilities are necessary for all employees that use the EDMS system:

- Electronic signature – Each employee shall choose a password of their choice to enable access to the system and to review activity tracking. The electronic signature tracks time and date stamps all entries within St. Louis Center's Electronic Data Management System (EDMS) Employees shall NEVER give this password to any other employee. Violation of this policy shall result in immediate discipline up to and including termination.
- Communication through St. Louis Center's Electronic Data Management System (EDMS) must be professional, accurate, sensitive, and respectful. If communication is not professional, it will be considered an employee performance concern and is subject to disciplinary action.
- The use of Secure Communication in sharing of sensitive information is strictly confidential. Any unauthorized sharing of such information may be considered a breach of confidentiality.
- Employees are given computers and access to St. Louis Center's Electronic Data Management System (EDMS) to assist them in the performance of their jobs. Employees should have no expectation of privacy in anything they create, store, send or receive using the company's computer equipment. The computer network is the property of the St. Louis Center and may be used only for St. Louis Center's purposes.
- St. Louis Center has the right to monitor and log any and all aspects of its Computer system including, but not limited to, monitoring Internet sites visited by employees, monitoring St. Louis Center's access, monitoring chat and newsgroups, monitoring file downloads, and all communications sent and received by users.
- Employees are prohibited from signing onto St. Louis Center's Electronic Data Management System (EDMS) during their unpaid time unless authorized by their manager. Employees are prohibited from signing onto the EDMS system at a location other than one considered company property unless authorized by their manager.

Violations of this policy may result in disciplinary action up to and including discharge.

Policy: It is the policy of St. Louis Center to provide an area of safe keeping for staff personal property within each residential home. All personal property should be kept locked in these areas while staff is at work, if it must be brought into the building. St. Louis Center is not responsible for the maintenance or replacement of any personal property kept on campus. Exceptions can be made at the administrator's discretion in accordance with the procedures below.

Procedures:

1. The maintenance staff are allowed to utilize personal tools in the work place in order to allow them to be as productive as possible.
 - a) St Louis Center assumes no liability for injury that occurs due to failure of tool.
 - b) St. Louis Center will replace any tool with the same or similar value of tool, should the tool be broken in regular work-related use. However, should SLC replace a tool, it is now the property of SLC and must be left here at the termination of employment.
 - c) New maintenance staff are provided with a suggested list of tools upon hire, however, are under no obligation to purchase them.
2. Eyeglasses: Damage by a resident will be assisted by SLC up to a limit of \$150.00. Employee should first utilize their optical insurance, and then submit the overage to administration.
3. Clothing: Clothing that is damaged by a resident will be replaced by the agency. The amount of reimbursement should be reasonable, and employees should avoid wearing expensive or clothes with special meaning to them to work.
4. Vehicles: Employees are required to lock all vehicles to avoid damage. In the event that a resident damages the personal vehicle (breaks windshield, pulls off windshield wiper blades, etc.), the staff may ask for reimbursement to fix the property. Reimbursement will be totally at the discretion of administration.
5. Cell Phones: Cell phone damage caused by a resident will **not** be reimbursed. Cell phones are not to be used, should be locked up in a way that keeps them from resident reach during work hours. Please refer to **PEP 4.6.5** for more information regarding cell phone use.

Procedure for reimbursement:

1. Staff will complete form PEF 4.1.02 Request for Funds.
2. Staff will attach either receipt or estimate for repair to the form.
3. Staff will turn in form to HR, COO or CEO for signature, who will then submit it to the finance department.
4. St. Louis Center maintains the right to deny requests or request additional estimates.

ST. LOUIS CENTER STATEMENT OF ETHICAL PRACTICES

St. Louis Center is an organization founded and operated by the Servants of Charity, an order of Catholic priests and brothers whose mission is to care for those who are in need; the forgotten and suffering; those who have been disenfranchised by society. Documents developed for the purpose of guiding “Guanellian workers” in their day-to-day responsibilities include the *Basic Document for the Guanellian Mission* and *With Faith, Love, and Competence*. These documents help to establish a direction for every day action that is consistent and supportive of the Guanellian Mission and the mission of St. Louis Center.

Consistent with these principles, St. Louis Center requires employees to apply stewardship of the resources that are entrusted to us, honesty in all dealings, and protection for our residents. Our resources should never be wasted, but fully utilized in support of our mission. Therefore, instances of waste, fraud, and abuse are considered violations of St. Louis Center ethical practices.

The tone and direction of these documents are the basis for the following statements of ethical behavior and practices to be employed at the St. Louis Center:

Business practices:

Consistent with the spirit of cooperation, respect and simplicity, business relationships of St. Louis Center should be conducted with an open, honest approach. Employees and representatives of St. Louis Center should keep in mind that the primary purpose is to support the needs of those in our care, and avoid relationships and situations in which the needs of the Center may be subverted to their personal benefit. Dealing with vendors, suppliers, agencies and parents should be handled with patience and respect, and honesty is paramount in order to establish a bond of trust.

Marketing:

Marketing materials should fairly represent the services that we provide, and in areas where lines are not well defined, it is best to err on the side of being conservative. No photos should be used of residents without express written permission of the resident and/or guardian. Stories, photos and other materials should never seek to exploit or present stories that would present residents in a negative light. Appeals for support should do so without compromising the integrity and humanity of those we serve, either individually or as a group.

Service Delivery:

St. Louis Center exists for the primary purpose and intent to support the positive respect and development of individuals in our care. Employees are paid to support that purpose. Therefore, any action on the part of a St. Louis Center employee that subverts that purpose is a violation of their ethical and legal relationship with us. This includes, but is not limited to, actions that are intentionally harmful to the health or welfare of a resident, attempts to disgrace or humiliate a resident or withhold contracted services, or statements to others that can cause others to view the resident in a negative light.

Professional Responsibilities:

The Guanellian concept of professionalism not only includes competence in knowing what to do and how to do it, but functioning as a neighbor and team member with other employees, working together toward the common goals of the organization. Residents and co-workers alike should be treated with dignity and respect. Only administrative staff are able to witness legal documents (ie. DOA, Advanced Directives, etc.).

Human Resources:

The objective of the St. Louis Center is the integral promotion of people. St. Louis Center establishes programs and procedures to support the total development of its employees, and the employee is expected to respect the establishment and characteristics of the work environment. This includes a respect for the physical environment and assets of the Center, the need for conservation of monetary and physical resources, and an understanding that donated items and services are given in good faith for the support of the residents. Actions contrary to this understanding are considered an ethical violation of the employment relationship.

Personnel Policy on Good Moral Character and Criminal Histories

Effective April 1, 2006 this organization must comply with Public Act 28 and 29 of 2006. In brief summary, this State statute mandates the obtainment of extensive criminal history background information, including FBI fingerprinting, of all individuals who seek employment, independent contract or clinical privileges in positions that provide "direct access" to the consumers served by this company. "Direct Access" is defined as access to a patient or resident or to a patient or resident's property, financial information, medical records, treatment information or any other identifying information. This law supplements and reinforces this organization's long-standing policies relating to requisite good moral character and suitability to work with vulnerable adults.

Public Act 28 and 29 of 2006 prohibits the following individuals with certain conviction histories from regularly providing direct services to consumers. A complete list appears at the end of this policy.

Public Act 28 and 29 of 2006 also prohibits the employment, independent contract or clinical privileges to individuals who have been the subject of a finding of not guilty by reason of insanity and findings of neglect, abuse or misappropriation of property by a state or federal agency pursuant to an investigation conducted in a skilled nursing facility.

The criminal history background information mentioned in this policy will be obtained by this organization only after a written good faith offer of employment or contract has been extended. All workers covered under this law must, as a condition of employment, execute any and all consent forms, acknowledgements and releases arising from compliance with Public Act 28 and 29 of 2006.

As a condition of continued employment, all direct access workers must immediately report to this organization any arraignment or conviction of one or more offenses that make them ineligible to work under Public Act 28 and 29 of 2006. As an additional condition of employment, all direct access workers must report to this organization if they have become the subject of an order or disposition finding of not guilty by reason of insanity. Similarly, workers are to report if they are the subject of a substantiated finding of neglect, abuse, or misappropriation of property by a state or federal agency pursuant to an investigation arising in a skilled nursing facility.

The provision of false, incomplete or misleading information during the hiring and application process will result in refusal of work and/or termination. Under Michigan law, an individual who knowingly provides false information regarding his or her identity, criminal convictions or substantiated findings is guilty of a misdemeanor punishable by imprisonment for not more than 93 days or a fine of not more than \$500.00, or both.

PEP 4.7.03 Outside Activities Policy Updated: 07/29/08

Outside employment is permissible if it does not interfere, compete or conflict with St. Louis Center interests, provided it does not hinder the employee's ability to meet the responsibilities and demands of their employment at St. Louis Center.

Employees should notify the Human Resources Director of any outside employment. Approval for such activities may be denied, or at a later date, withdrawn, if it is believed to be in the best interests of St. Louis Center. Refusal to comply with a request to discontinue outside employment may result in termination of employment at St. Louis Center.

St. Louis Center encourages outside involvement in community, industry and charitable activities, including directorships in non-profit community organizations and personal fundraising, as long as they do not cause conflicts of interest or create demands that interfere with the job.

Statement of Commitment

St. Louis Center is committed to providing its employees with a harassment-free environment. The Center absolutely prohibits harassment of our employees based on sex, race, color, religion, national origin, age, disability, height, weight, marital status, or familial status. This includes sexual harassment, which is not tolerated. Conduct of any employee that harasses, disrupts, or interferes with an employee's work performance or which creates an intimidating, offensive, or hostile environment is prohibited.

Our prohibition against harassment applies to everyone at the Center. We will not permit our employees to be harassed by supervisors, co-workers, or third parties over whom we have control such as clients, or customers. None of our employees, including our officers, top management officials, supervisors, or any other employees, are authorized to engage in conduct that amounts to harassment. Our policy is to exercise reasonable care to prevent any harassment and, if such misconduct occurs, to investigate and take prompt remedial action, no matter whom it involves. In cases where high-level supervisors or officers are accused of harassment, the Center will take all reasonable steps to ensure the fairness and evenhandedness of its investigation, including bringing in outside investigators if appropriate.

What is Sexual Harassment?*

Sexual harassment is any unwelcome sexual advance, request for sexual favor, or other unwelcome verbal or physical conduct of a sexual nature when:

- An employee's submission to such conduct is made either explicitly or implicitly a term or condition of the employee's employment;
- An employee's submission to or rejection of such conduct is used or threatened to be used as a basis for employment decisions such as hiring, firing, promotion, salary decisions, or work assignments; or
- Where such conduct has the purpose or effect of creating an intimidating, hostile, or offensive working environment.

Examples of conduct that may constitute sexual harassment includes, but is not limited to:

- Requests for sexual favors;
- Hugging, rubbing, touching, patting, pinching, or brushing another's body;
- Inappropriate whistling or staring;
- Veiled suggestions of sexual activities;
- Requests for private meetings outside business hours for other than legitimate business purposes;
- Use of sexual jokes, stories, lewd comments, or images in no way germane to business;
- Remarks about a person's sexual relationships, activities, experience, or personal appearance; or
- Demeaning, insulting, intimidating, or sexually suggestive written, recorded, or electronically transmitted messages.

*** Although this section of the policy specifically addresses sexual harassment, please note that harassment based on race, color, religion, national origin, age, disability, height, weight, marital status, or familial status is also prohibited and will not be tolerated by the Center.**

PEP 4.7.04 Anti-Harassment Policy (Continued)

Complaint Procedures

All employees have a responsibility to come forward with a complaint when the employee believes he or she has been harassed. In addition, employees who witness instances of harassment or who suspect harassment is taking place against a fellow employee are encouraged to bring this information forward. Employees are encouraged to bring their complaint right away before the harassment becomes severe or pervasive.

An employee may bring a complaint to any of the "Contact People." The employee can contact their Supervisor, the Human Resources Coordinator, or Administrative Personnel. It will be helpful if the employee brings a written description and record of the incident(s) of harassment to the Contact Person. However, the complaint need not be in writing to be taken seriously.

The following steps will then be taken:

- A review committee will be formed consisting of the employee's Contact Person, a member of the Human Resources Department, and a Supervisor or Department Head. The committee will investigate the complaint promptly and objectively. The investigation will most likely involve interviewing the parties and other potential witnesses who may have helpful information. The Committee will gather and consider the facts honestly and without bias.
- During the investigation, temporary corrective measures may be taken to limit contact between the employee and the alleged harasser such as scheduling changes, transferring the alleged harasser, or placing the alleged harasser on non-disciplinary leave with pay. Such measures will be taken if necessary until resolution of the complaint.
- After gathering facts, the Committee will determine whether harassment took place based on the definition of harassment in this Policy.
- If the Committee finds that sexual harassment did occur, appropriate sanctions will be imposed.
- Employees can contact the Human Resources Coordinator or the Training Coordinator in order to ask questions or discuss concerns about these procedures.

Confidentiality

Upon receiving the complaint, the Review Committee will conduct a prompt and thorough investigation of the allegations. The employee should cooperate with the investigation by providing the Committee with information. The Committee will make all reasonable attempts to protect the confidentiality of the complaint and our investigation process. The Committee will take the interests of confidentiality into consideration while investigating and remedying a complaint to the greatest extent possible.

Possible Sanctions

If an employee violates this policy, regardless of what position he or she may hold, the Center will take appropriate corrective and remedial action. Possible sanctions include:

- An oral or written reprimand in the personnel file;
- Transfer or change of job assignment;
- Suspension or probation; or
- Termination

While counseling is not considered a sanction, it may be offered or required in addition to sanctions.

- A.** It is the policy of the St. Louis Center not to permit residents, staff, volunteers and visitors to bring or be in possession of any dangerous weapon.
- B.** A dangerous weapon includes, but is not limited to:
 - 1. Firearms:
 - a.** any weapon which will be or is designed to or may readily be converted to expel a projectile by the action of an explosive or mechanical action
 - b.** the frame or receiver of any such weapon
 - c.** any firearm muffler or silencer
 - d.** any destructive device, including bombs, rockets, or any other explosive type device
 - 2. Dagger, dirk, stiletto, knife with a blade over three inches in length, pocketknife opened by mechanical blade, iron bar, or brass knuckles.
 - 3. Any object used for the purpose of harming others.
- C.** Residential staff is authorized to confiscate/search for such weapons from residents or other suspected persons on the premises of the St. Louis.
- D.** Parents/Guardians of the residents in violation of this policy shall be notified. Residents in breach of this policy shall be discharged pending a disciplinary staffing. Unless the resident establishes a clear and convincing manner in the sole judgment of St. Louis Center, at least one of the following:
 - 1. The object/instrument possessed by the resident was not possessed by the resident for the use as a weapon, or indirect delivery to another person for the use as a weapon.
 - 2. The weapon was not knowingly possessed by the resident.
 - 3. The resident did not know or have reason to know that the object/instrument possessed by the resident constituted a dangerous weapon.
 - 4. The weapon was possessed by the resident at the suggestion, request or direction of, or with the express permission of St. Louis Center or police authorities.
- E.** Violation of this policy will result in disciplinary procedures that may result in dismissal/discharge from St. Louis Center.
- F.** Discharges may be appealed to the Administrator and the St. Louis Executive Committee within three days of discharge. After review the Administrator's decision is final based on all factors of consideration. The parent/guardian may include conditions in a petition for reinstatement.

PEP 4.7.06 Safety Manual Updated: 11/24/08

All employees are required to familiarize themselves with the St. Louis Center Safety Procedures, including emergency plans, evacuation, vehicle use and accident procedures, location of first aid kits, location and operation of fire extinguishers, and so forth.

Policies and procedures related to safety are compiled in the St. Louis Center Safety Manual. Copies of this manual are posted in the units, time clock room, and other areas so they are available when the need arises.

PEP 4.7.07 Conflict of Interest Updated: 12/01/08

For the purpose of employment with St. Louis Center, a conflict of interest is defined as a situation in which a staff is involved with a personal or professional relationship that makes it difficult for them to fully perform the requirements of their employment. Although it is not possible to detail every possible situation that may result in an actual or perceived conflict of interest, some potential conflict situations are described below.

A conflict may occur when an employee has a family or personal relationship with a subordinate that make it difficult to impartially evaluate their work performance.

A conflict may occur when an employee has a financial interest in an organization that provides services to St. Louis Center if the employee has the ability to influence the decision to utilize the services of that organization.

A conflict may occur if the employee has another job that impedes the employee's ability to work their scheduled hours at St. Louis Center.

If a conflict or potential conflict of interest arises during the course of employment with St. Louis Center, or the employee becomes aware of a potential conflict, the employee must immediately bring the situation to the attention of Administration for resolution.

All employees have a responsibility to report when the employee believes that there has been a violation of St. Louis Center ethical practices.

A broad outline of ethical practices is presented in the Personnel Manual (PEP 4.7.1), however, some situations can be hard to define or categorize, so employees are encouraged to use common sense in determining if a practice is unethical. If something does not seem right, or does not seem to support the principles and practices of St. Louis Center, its staff or residents, employees should feel free to share their concerns.

An employee may bring a complaint to any of the "Contact People." The employee can contact their Supervisor, the Human Resources Coordinator, Training Coordinator, or Administrative Personnel. It will be helpful if the employee brings a written description and record of the suspected violation to the Contact Person. However, the complaint need not be in writing to be taken seriously.

St. Louis Center employs a no-reprisal approach to employees reporting potential ethical violations. Regardless of whether investigations determine that a violation has occurred, the reporting employee will not face adverse consequences from St. Louis Center as long as they have brought the concern forward in good faith.

The following steps will be initiated within 2 weeks of the report:

- A review committee will be formed consisting of the employee's Contact Person, a member of the Human Resources Department, and a Supervisor or Department Head. The committee will investigate the complaint promptly and objectively. The investigation will most likely involve interviewing the parties and other potential witnesses who may have helpful information. The Committee will gather and consider the facts honestly and without bias.
- During the investigation, temporary corrective measures may be taken to prevent reoccurrence of the violation during the investigation. Such measures will be taken if necessary until resolution of the complaint.
- After gathering facts, the Committee will determine whether an ethical violation took place based on the definition of ethical violations in Policy PEP 4.7.1.
- If the Committee finds that an ethical violation did occur, appropriate sanctions will be imposed.
- Employees can contact any Contact Person in order to ask questions or discuss concerns about these procedures.

PEP 4.7.09 Mail Pickup and Distribution Policy Updated: 04/05/17

It is the intention of this policy to establish a chain of command for the pickup and distribution of St. Louis Center's mail. The purpose of this policy is to ensure expeditious and timely delivery of all mail with attention to confidentiality.

Mail is only to be delivered and opened by the person it is addressed to. In the event it is addressed to a job title it is to be delivered and opened only by that person holding that title or equivalent.

Mail addressed only to the St. Louis Center or Servants of Charity is to be delivered and opened by the CEO.

Chain of command for picking up and distributing mail is as follows: (In the event the person listed first is not at work the next in line is responsible for retrieving and distributing the mail. If the second person is also unavailable the third will be responsible...and so on).

Office Manager
CFO
COO
CEO
HR Director

Certified and registered mail can only be signed for by staff listed above. If one of these staff members is not available the letter or parcel is NOT to be signed for.

PEP 4.7.10 BUSINESS TRAVEL EXPENSES Updated: 04/05/17

To carry out St. Louis Center activities, staff will have to travel and will incur some expenses during the travel time. The Center, after prior approval, will reimburse the staff according to the following policy and procedures. St. Louis Center will reimburse employees for legitimate business expenses directly related to accomplishing business objectives, according to the following guidelines. The administrator must approve all such business/travel expenses in advance. Employees whose travel plans have been approved are responsible for making their own travel arrangements. The approved maximum meal allowance is as follows:

Meal Reimbursement Allowance:

Breakfast Only \$ 8.00

Lunch Only \$ 12.00

Dinner Only \$20.00

Mileage reimbursement for use of personal vehicles will be allowed only when an agency vehicle or other less expensive form of transportation is unavailable. The rate paid per mile will be based on the current standard IRS allowance.

Expenses that will generally be reimbursed include the following:

- Air or train fare for travel in coach or economy class or the lowest available fare.
- Car rental fees, only for compact or mid-sized vehicles.
- Fares for shuttle or airport bus service, or other public transportation for ground travel.
- Cost of standard accommodations in low to mid-priced hotels, motels, or similar lodgings.
- Cost of meals not exceeding maximums outlined in this policy.
- Tips not exceeding 15% of the total cost of a meal or 10% of a taxi fare.
- Charges for telephone calls, fax, and similar services required for business purposes parking fees.
- Other business related event fees associated.

Vehicles owned, leased, or rented by the St. Louis Center may not be used for personal use without prior approval of the Administrator.

Cash advances to cover reasonable anticipated expenses may be made to employees, after travel has been approved. Employees should submit a written request to the administrator when travel advances are needed. A detailed report with receipts will be required to account for cash advance expenses.

With prior approval, a family member or friend may accompany employees on business travel. The presence of a companion must not interfere with successful completion of business objectives. Generally, employees are permitted to combine personal travel with business travel, as long as time away from work is approved. Additional expenses arising from such non-business travel are the responsibility of the employee. Abuse of this business travel expense policy, including falsifying expense reports to reflect costs not incurred by the employee, will be grounds for disciplinary action, up to and including termination of employment.

Upon completion of traveling the staff has to submit a detailed expense reimbursement form, attaching all the receipts. This expense report is due within seven days of return.