



VANDERHEYDEN

Giving new life to children and families since 1833

Employee Handbook





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VANDERHEYDEN

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WELCOME!

We are pleased that you have chosen to be a member of the team at Vanderheyden and part of agency's mission to "empower individuals we serve and their families to build brighter lives." Since 1833, our staff and volunteers have been meeting the needs of individuals, families and communities throughout New York State. Our goals are to make Vanderheyden the best place to live, work and go to school.

Here at Vanderheyden, you will find good people with whom to work, good trainers to help you progress, and a work atmosphere that is welcoming and supportive. We value all our team members for the varied and diverse strengths they bring to their jobs. During your first few weeks with us please take the opportunity to explore your surroundings and get to know your teammates. Feel free to ask questions; people here are eager to help and want you to succeed.

Vanderheyden has adopted a set of **ROYALS** values for staff to model and individuals to adopt, promoting **r**espect; **o**ptimism; **y**outh, adult and family involvement; **a**ccountability, **l**eadership; and **s**ervice to others.

The Agency is dedicated to the Sanctuary model for organizational development and growth for both staff and the individuals we serve. The Sanctuary model is a blueprint for developing trauma-informed, therapeutic communities that promote recovery, which addresses the ways trauma; adversity and chronic stress influence the behavior of individuals and organizations and creates a problem-solving process and model for change.

Implementing our goals of being the best place to work, live and go to school is an agency-wide effort involving every member of our team, and applying your skills, interests and talents. We encourage your ideas and your involvement.

Please read this handbook carefully and keep it handy for future reference. Try to familiarize yourself with its contents as soon as possible, as it should answer many of your initial and ongoing questions about your employment with Vanderheyden. We want you to be fully informed and understand our policies and procedures completely.

We look forward to your participation as Vanderheyden continues to strive for excellence service and care for another 180 years!

Best wishes,

Karen Carpenter Palumbo
President and CEO

ABOUT THE EMPLOYEE HANDBOOK

This handbook has been prepared to provide the information which employees should have about Vanderheyden Hall, Inc., hereafter referred to as “Vanderheyden,” “Vanderheyden Hall” or “the Agency” to help you understand our operations and procedures. This reflects the belief that each employee plays an important role, bears significant responsibility to his/her position, and should be given the highest level of personal respect and support at work.

While this handbook is intended to be an overview, it is recognized that questions and concerns may arise which are not specifically addressed in the information provided. Please do not hesitate to contact your manager or the Human Resource Office at 283-6500 ext. 220, if you have a question on the handbook information or if you have a specific issue or concern that you wish to discuss which is not explained in this handbook.

The Handbook summarizes the Agency's **Human Resource Policies section in the Operations and Policy Manual** where detailed information on each of the areas can be found. The Handbook is a part of the Agency's Operations and Policy Manual which can be found on the Agency intranet.

The Handbook replaces all those previously issued handbooks and presents an overview of the policies and practices in effect as of November 2014. It is not intended to supersede the provisions of existing collective bargaining agreements (where applicable) and its provisions are not intended to represent contractual terms. Where collective bargaining agreements remain silent, Agency policy and procedures take precedent. Employees are hired for an indefinite term and are employed at-will. Employees may terminate their employment, or be terminated, at any time for any reason.

This Handbook will be reviewed and revised on an as needed basis and employees may be notified of revisions in a timely manner.

ABOUT VANDERHEYDEN

Purpose and Mission

Mission – “Empowering the individuals we serve and their families to build brighter futures.”

Purpose – Vanderheyden “exists to provide quality care and services to the individuals we serve and their families through a therapeutic milieu that stresses skills development, counseling, and experiential learning. All efforts are directed toward program participants eventually taking their rightful place in the community, society and/or their families.

Vanderheyden Hall serves individuals who are either emotionally disturbed, abused, emotionally delayed, developmentally disabled, neglected, abandoned, delinquent, and in need of supervision, and individuals who are emotionally and/or developmentally impaired. Individuals are served in residential, education and community-based settings.”

Service Area – Vanderheyden has a service area of more than 30 counties, as well as New York City and the St. Regis Mohawk Tribe.

Interdisciplinary Approach – Vanderheyden takes an interdisciplinary approach to the care and education of the individuals and families we serve. Vanderheyden team includes members in direct care, social work, clinical, counseling, education, health services, and food services, as well as quality assurance, agency administration, finance, marketing and development, maintenance, and information technology.

Individuals in the care of Vanderheyden are served in a safe, nurturing setting. Individual as well as family counseling are provided. Direct care workers provide positive role models in all of the Vanderheyden residences. Clinicians provide individual, group and family counseling, and cases are managed on a team basis. Individuals are provided opportunities to develop life skills and to enjoy a positive learning experience in Vanderheyden Educational Center, an accredited middle and high school.

Programs – Vanderheyden provides Residential Treatment, Community Services, and Education, including these programs:

1. Education – Regents-accredited secondary school for grades 7-12 for special education students and those at risk of not succeeding in school, serving residential and day students. (Refer to Appendix A for Education Supervisor Hierarchy)
2. Diagnostic services – Diagnostic assessments of psychological, psychiatric, medical, emotional, educational, family and individual conditions (ages 10-21)
3. Residential treatment – For youth who face developmental, behavioral, and/or emotional challenges, including hard-to-place (ages 12-21)
4. Hard to place group home – For adolescents dually diagnosed with developmental and emotional challenges (ages 12-21)
5. Community connections – Intensive youth/family services while youth are in residential treatment program and afterwards in home-based settings (ages 12-21)

6. Supervised independent living program – Supervised apartment living for young adults in foster care (ages 16-21) who are preparing for the transition to independence
7. Supervised individual residential alternatives – Home to adolescents and adults with developmental challenges
8. Community supportive individual residential alternatives – Supportive apartments for adults with developmental challenges and their families
9. Medicaid service coordination – Assistance for persons with developmental disabilities in gaining services and supports for successful community living
10. Bridges to health – Family and community support services to improve well-being for children in foster care in group homes or community - program conducted through NYS Office of Children and Family Services
11. Community habilitation – Services in home or outside home, offering personal, family, household and organization skills for individuals with developmental disabilities [ages 4-60] – program conducted through NYS Office of People With Developmental Disabilities
12. Home and community-based services waiver – Skills-building and respite for individuals with severe emotional challenges [ages 5-17 + families] – program conducted through NYS Office of Mental Health

Facilities

There are more than “34 doorways” to Vanderheyden programs. The Wynantskill campus is home to the Richard A. Desrochers Educational Center; seven cottage residences for youth; Health Services; clinical, diagnostic and respite services; and administration. Group homes, Supervised Individual Residential Alternatives (SIRA), Community Supportive Residential Alternatives (CSIRA), Supervised Independent Living Program (SILP) apartments are located in Capital District area communities. Families and individuals in Albany, Schenectady and Rensselaer counties are served through various home- and community-based services.

History

The roots of Vanderheyden services and care for children and families go back to the 1800s with the concern and action of community citizens. The Association for the Relief of Destitute Children was formed in 1833; the organization name was changed the next year to the Troy Orphan Asylum and in 1942 to Vanderheyden Hall. Throughout its history the Agency has been responsive to the changing needs of individuals in our care and built a solid foundation for innovation to meet those needs.

On April 10, 1835, an act of the New York State Legislature provided for the incorporation of the Troy Orphan Asylum. The Agency operated from rented facilities until 1835. The first permanent home located on Grand Division Street in Troy, with improvements and expansions over the years until destroyed by the 1862 "Great Troy Fire" which devoured numerous buildings in the area. Again the community came to the aid of the 100 youngsters living at the home. In 1863, construction began on a new structure located on Eighth Street in Troy.

In 1888 a gift of a 109-acre farm answered the need for larger facilities with better living quarters and playground services. The Spring Avenue site was occupied in 1893 and included a main building

in the style of an Elizabethan manor house. Later, the Hart Hospital, Tillinhast Chapel, Peterson Gymnasium and more acreage were added. There also was a building for babies on the property, which continues in use by the Agency today as its Bessey House.

With the change of name to Vanderheyden Hall in 1942, the focus of programming also changed from orphans to dependent and neglected children. The institution concept of child care became outdated and was replaced with smaller living units and individualized programming. A Diagnostic Unit for 30 day evaluation, community based group homes, and programs for children with special needs were added. In 1976 an Exceptional Group Home was established to provide residential care for children who are considered "hard to place."

In 1980, Vanderheyden Hall moved its 70-acre main campus to its present location in Wynantskill. Once serving as the New York Training School for Girls, it included a gymnasium and school building that could be used in Vanderheyden's programming. Also formerly the site of the Pawling Sanitarium, the location provided a pleasant rural setting for youth to grow and develop. Cottage residences were built that more closely approximate family living.

During the 1980s, Vanderheyden Hall developed new programs to involve families in counseling and treatment plans. Community programs were developed as transitional alternatives and for children with special needs. Group homes and independent living apartments enhanced Agency services by providing various stages of transitional living opportunities in the community.

In 1999, a new 36,000-square foot school was constructed on the Wynantskill campus and in 2003 campus cottages were renovated. In 2012-2013, the Diagnostic Unit was renovated to become Youth Emergency Services.

In the 1990s, Vanderheyden initiated further community service programming, with respite, parent assistance, case management, after-school programming, and prevention programs were added to the continuum of care. By 2000, Community Services had evolved into the fastest growing segment of the Agency. Initiatives in 2013 include the expansion of the Agency's Van Leuven Individual Residential Alternative (IRA), the addition of a new five-person IRA, and the addition of a 15th supportive apartment.

Organization Structure and Governance

Vanderheyden Hall, Inc. is a not-for-profit charitable organization, incorporated under the laws of the State of New York and designated as a 501(c)(3) organizations under the Internal Revenue Code. Programs of the Agency are licensed by the New York State Education Department, Office of Children and Family Services, Office of People with Developmental Disability, and Department of Health.

Board of Directors - The Board of Directors is the governing body and corporation for the organization. The business affairs of Vanderheyden are managed under the direction of the Board, in accordance with the Certificate of Incorporation and Bylaws.

The Chair serves as the chief corporate officer and presides at meetings of the board and corporation. Board appoints a President and President and Chief Executive Officer responsible for the organization's daily management and policy implementation.

Finance - The Board of Directors sets the fiscal and programmatic direction of the Agency. The Agency operates under an annual budget that is adopted each year by the Board, based on estimated assumptions including service provision expectations, expected rates and expense levels that is developed collaboratively by the Agency's management team. Departments are tasked with carrying out their programmatic outcomes within the constraints of the approved budget.

The Agency operates programs that generate fee for service, contractual or grant funding. In addition to program revenue, the Agency undertakes fund-raising activities and seeks grant opportunities, major gift development and long-term giving opportunities that relate to and promote the agency's mission. The majority of our funding required to meet operating needs comes from public sources. As such, the Agency is obligated to meet regulatory requirements by each of the regulatory bodies of those sources. In addition, the Agency must comply with the relevant governmental tax and labor authorities and general accounting standards in recording and use of program revenues and expenses.

Accurate financial reporting is critical in providing the necessary information for Agency operation and meeting the various reporting requirements. It also assists department in effectively managing their budget plan and ensuring adequate resources for programming needs; and aids in analyzing costs on a regular basis to plan strategically for future rate and funding issues. All employees play a vital role in this by following Agency policies and guidelines for billing, payroll and accounts payable.

Code of Ethics

By signing a copy of the Employee Handbook, you affirm that:

- I will not discriminate against or refuse professional services to anyone on the basis of race, color, creed, age, sexual orientation, religion, marital status, disability national origin, or citizenship.
- I will not use my professional relationship to further my own interests.
- I will evidence a genuine interest in all persons served, and do hereby dedicate myself to their best interests and helping them help themselves.
- I will respect the privacy of individuals served and hold in confidence all information obtained in the course of professional service.
- I will maintain confidentiality when storing or disposing of client records
- I will maintain a professional attitude which upholds confidentiality towards individuals served, colleagues, applicants and the agency.

- I, upon termination, will maintain client and co-worker confidentiality, and I will hold as confidential any information I obtained concerning the agency.
- I will respect the rights and views of my colleagues, and treat them with fairness, courtesy and good faith.
- I will not exploit the trust of my public or my co-workers. I will make every effort to avoid relationships that could impair my professional judgment.
- I will not engage in or condone any form of harassment or- discrimination.
- I will not permit fellow employees to present themselves as competent or perform services beyond their training and/or level of experience.
- I will respect the confidences of my co-workers.
- When I replace a colleague or am replaced, I will act with consideration for the interest, character and reputation of the other professional.
- I will extend respect and cooperation to all colleagues of all professions.
- I will not assume professional responsibility for the individuals of a colleague, without appropriate consultation with that colleague.
- If I see the client of a colleague during an absence or emergency, I will serve that client with the same consideration afforded one of my clients.
- If I have the responsibility for employing and evaluating staff performance, I will do so in a responsible, fair, considerate and equitable manner.
- If I know that a colleague has violated ethical standards, policy, or corporate compliance standard, I will report the activity to my manager.
- I will accurately represent my education, training, experience, and competencies as they relate to my profession.
- I will correct, when possible, misleading or inaccurate information and representations made by others concerning my qualifications or services.
- If serving as a manager, I will make certain that the qualifications of persons I supervise are honestly represented.
- I will abide by agency policies related to public statements.
- I have total commitment to provide the highest quality of service to those who seek my professional assistance.
- I will continually assess my personal strengths, limitations, biases, and effectiveness.

- I will strive to become and remain proficient in professional practice, and the performance of professional functions.
- I will act in accordance with standards of professional integrity.
- I will not advise on problems outside the bounds of my competence.
- I will seek assistance for any problem that impairs my performance.

Violations of this Code of Ethics may be grounds for dismissal.

Whistleblower Protection

Vanderheyden requires directors, consultants, officers, employees, and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of Vanderheyden, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility - This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that the Agency can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, employees and volunteers to report concerns about violations of Vanderheyden's code of ethics or suspected violations of law or regulations that govern Agency operations.

No Retaliation - It is contrary to the values of Vanderheyden for anyone to retaliate against any board member, officer, and employee or volunteer who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the Agency's operations. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

Reporting Procedure - Vanderheyden has an open door policy and suggests that employees share their questions, concerns, suggestions or complaints with their manager. If you are not comfortable speaking with your manager or you are not satisfied with your manager's response, you are encouraged to speak with the President and Chief Executive Officer, Compliance Officer or Board Member Managers are required to report complaints or concerns about suspected ethical and legal violations in writing to the Agency's Compliance Officer or board member, who has the responsibility to investigate all reported complaints. Employees with concerns or complaints may also submit their concerns in writing directly to their manager or the President and Chief Executive Officer or the Agency's Compliance Officer.

Compliance Officer - The Agency's Compliance Officer is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Compliance Officer will advise the President and Chief Executive Officer and/or the Board of Directors of all complaints and their resolution and will report at least annually to the Personnel Committee on compliance activity relating to accounting or alleged financial improprieties.

Accounting and Auditing Matters - The Agency's Compliance Officer shall immediately notify the Personnel Committee of any concerns or complaint regarding corporate accounting practices, internal controls or auditing and work with the committee until the matter is resolved.

Acting in Good Faith - Anyone filing a written complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation.

Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

Confidentiality - Violations or suspected violations may be submitted on an anonymous basis by the complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Handling of Reported Violations - The Agency's Compliance Officer will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

GENERAL POLICIES

Philosophy of Treatment

The Philosophy of Treatment of Vanderheyden is based on the provision of superior care and treatment to the individuals and families we serve. Our treatment model is strength based and family oriented. Our treatment model values the importance of family, a healthy environment and developing and rewarding positive behaviors. Supportive services are provided to assist the individuals in achieving their goals and reintegrating with their family and community.

Treatment modalities are provided in an interdisciplinary team approach. Group, individual and family therapy are provided as the main aspect of our treatment model. These interventions are supported by milieu therapy. The collective needs of the individual and their families are served through collaborative, cooperative and respectful processes.

Use of Physical Restraints

It is the mission of Vanderheyden Hall to help each individual learn to live independently and develop appropriate life and social skills and interactions. At times, because of unsafe or challenging behaviors, an individual may need to be physically restrained to keep him/herself, others, environment, peers and staff safe.

Required staff are trained and certified *within 8 weeks* and meet refresher/recertification criteria thereafter in either *Strategies for Crisis Intervention and Prevention (SCIP R)*, *PROMOTE*, or *Therapeutic Crisis Intervention (TCI)* to ensure safety in specific instances.

Sanctuary Model

Vanderheyden applies the Sanctuary Model for staff and the individuals served by the agency. Sanctuary, used by organizations across the country and internationally, is a blueprint for clinical and organizational change which, at its core, promotes safety and recovery from adversity through the active creation of a trauma-informed community, and fosters growth and changes.

Sanctuary is a treatment and organizational change Model. The Sanctuary Model is the basic blueprint that promotes safety and recovery from adversity through the active creation of trauma-informed, therapeutic communities. The Sanctuary Model integrates trauma theory with the creation of therapeutic communities to provide a safe environment for both students and the staff who work with them. Vanderheyden is committed to the Sanctuary Model.

Sanctuary's Seven Sanctuary Commitments, a set of values that outlines as a way to lead individuals and organizations away from trauma-reactive behaviors, are:

- Commitment to Nonviolence - Being safe physically, emotionally, and with others and to do the right thing.
- Commitment to Emotional Intelligence - Managing our feelings so that we don't hurt ourselves or others.

- Commitment to Social Learning – Respecting and sharing ideas of others.
- Commitment to Shared Governance – Shared decision making.
- Commitment to Open Communication – Saying what we mean and not being mean when we say it.
- Commitment to Social Responsibility – Together we accomplish more, everyone makes a contribution to the organizational culture.
- Commitment to Growth and Change – Creating hope for the individuals we serve and ourselves.

Sanctuary provides a problem-solving framework that focuses on Safety, Emotions, Loss and Future (SELF) and a toolkit of resources including safety plans, community meetings, self-care plans, and red flag meetings.

Vanderheyden provides resource information about Sanctuary, as well as training and activities involving staff and individuals. Contact your manager for more information.

ROYALS

Vanderheyden has established a set of values based on the acronym ROYALS (also the proud name of the Agency's sports teams) for staff to strive for in their work and for individuals to strive for in their growth and development:

- Respect (nonviolence) - Respecting each other, members of the community and those we serve
- Optimism(future) - The manner in which we look forward with a smile
- Youth, adult and family involvement(shared governance) - Encouraging engagement in all levels of the organization
- Accountability (shared responsibility) - Holding each other and ourselves equally responsible for the environment in which we live, work and go to school
- Leadership (emotional intelligence) - Committing to open communication, growth and change for each member of our community
- Service to others (social responsibility) - Serving each other, our community and those who need our help

Confidential Individual Information

Each individual and their correspondent have the right to privacy and the right to confidentiality of records. Employees may not reveal information about the Agency's individuals to individuals not

employed by the Agency, except when dealing with other agencies, medical personnel, etc., on matters relating to the individual.

Documentation and minutes of incidents regarding individuals are maintained at the main office. No employee or other individual may have access to this documentation without confirmed approval from the President and Chief Executive Officer and/or the Compliance Officer.

All Agency business should be treated as confidential. Any inquiries from the news media should be referred to the President and Chief Executive Officer. Employees are not allowed to give comments to reporters.

An employee who violates the confidentiality of Agency individuals or speaks to the news media as a representative of the Agency will be subject to possible disciplinary action, even termination.

All individual records will be secured in locked cabinets. Access to individual records is limited to staff who are authorized to view them. Records and specific information will not be left out where they can be viewed by unauthorized persons.

Computers and/or computer systems will be made secure so that unauthorized viewing of information will not occur. Information will be kept on a secured network. Employees are prohibited from using or accessing personal health information (PHI) and any other information about individuals served unless they are using Agency technology that is password protected and encrypted.

Inactive files and records will be maintained as outlined in the Agency's Policy and Procedure Manual, under the heading Record Retention Policy. Each department or facility will store records that are not in use as active files. Arrangements will be made by the Agency administration to have inactive files brought to the off-site storage facility on an annual basis.

HIPAA

This is a brief overview of staff requirements concerning protection of the privacy of Agency individuals' health information. These requirements are based on federal law and rule under provisions of the Health Insurance Portability and Accountability Act of 1996 (HIPAA). For reference and further information, consult the Agency's Operations and Policy Manual, copies of which are maintained in the Main Office and at the individual residences.

The Federal Department of Health and Human Services has published comprehensive regulations that implement and enforce certain requirements of HIPAA with respect to the privacy of individually identifiable health information; these regulations are referred to as the HIPAA Privacy Regulations. These regulations complement, rather than replace, existing federal and state privacy laws affecting our individuals. Our implementing policies and procedures required under the regulations prescribe certain requirements that staff members must follow when using or disclosing individuals' identifiable health information. (The term "staff members" refers to Agency employees, its independent contractors, Board members and volunteers.)

PHI will be stored as outlined in the Confidential Individual Information policy to ensure that information breaches do not occur. A breach is defined as unauthorized acquisition, access, use or disclosure of PHI. All instances of information breach will be investigated by the Privacy Officer unless it has been determined that there is low probability that the information has been compromised.

Records Retention and Disposal

Vanderheyden shall establish standards of best practice regarding the removal of case records, and/or any information and documents contained in the case record. A procedure as to the appropriate dispensation of the case records and/or documents contained within is outlined in this policy. This policy will utilize all applicable Federal and NYS laws and regulations as the minimum standard for retention and disposal to ensure confidentiality of documents.

All electronic PHI must be stored on an Agency server only. Access to information must be password protected and encrypted. Employees are prohibited from storing electronic PHI on personal devices.

Vanderheyden shall maintain the most current seven years of case records and/or documents. All case record documents older than seven years shall be appropriately destroyed in a manner that ensures confidentiality. This shall be accomplished by placing files needing to be destroyed in the secured recycling bin located in the main office mailroom or by contacting the business office to arrange pick up of files to be destroyed by the recycling company.

Staff is expected to follow this policy and vary from the specification only after seeking approval from the President and Chief Executive Officer. Staff should contact the Compliance Officer prior to disposal of case records/ documents that do not meet the standards set forth in this policy for approval.

Case records will be purged on a yearly basis specific to program needs. (See Operations and Policy Manual) Any case records/documents needing to be moved to the agency storage facility will be done in a secure and confidential manner. The Compliance Officer will assist with storage procedures. Any agency employee needing access to the storage facility shall request/sign out and return items on the same day. A reason shall also be documented before access to the storage facility.

This policy also covers the record retention and disposal of the following:

- Financial Records/Documents
- Personnel and Training Records
- Medicaid Service Coordination (MSC)
- Family Support Services (FSS)
- Computer Information and Database

FAIR TREATMENT POLICIES

Equal Employment Opportunity Policy

Vanderheyden's Equal Employment Opportunity Policy is designed to apply recruiting, hiring, promotion, compensation and professional development practices without regard to race, color, religion, gender, age, national origin, disability, marital status, or domestic violence victim status, sexual orientation, genetic predisposition or carrier status, veteran status or any other protected characteristic as established by federal and state law.

This policy applies to all terms and conditions of employment including, but not limited to: recruiting, hiring, placement, promotion, termination, layoff, transfer, leave of absence, compensation, benefits, training, and social and recreational programs.

Each employee is responsible for helping Vanderheyden maintain a climate that provides equal opportunity for all.

Affirmative Action

In order to implement the policy of Equal Employment Opportunity, Vanderheyden has adopted an affirmative action program.

Vanderheyden will cooperate with federal, state, or local government agencies that have the responsibility of observing our actual compliance with various laws relating to employment. Vanderheyden will furnish such reports, records, and other matters as requested in order to foster the program of equal opportunity for all persons regardless of race, color, religion, gender, age, national origin, disability, marital or domestic violence victim status, sexual orientation, genetic predisposition or carrier status, veteran status.

Human Resources is responsible for coordinating all aspects of the Equal Employment Opportunity process to assure non-discrimination and compliance with all applicable orders and guidelines. Questions and/or complaints concerning equal employment opportunity should be directed to Human Resources or Corporate Compliance.

Accommodations for Individuals with Disabilities

It is the policy of Vanderheyden to comply with all the relevant and applicable provisions of federal and state law protecting the rights of people with disabilities. Vanderheyden will not discriminate against any qualified employee or job applicant with respect to any terms, privileges, or conditions of employment because of a person's physical or mental disability. Consistent with this policy of nondiscrimination, the Agency will make reasonable accommodation wherever necessary for all qualified employees or applicants with disabilities, provided that any accommodation made does not impose an undue hardship on the Agency.

You must notify your manager and Human Resources of your need for an accommodation. Upon doing so, Human Resources may ask you for your input on the type of accommodation you believe may be necessary and the functional limitations caused by your disability.

Additionally, when appropriate, Vanderheyden may request that you obtain additional information from your physician or other medical or rehabilitation professionals to verify your claimed functional limitations and need for an accommodation.

Workplace Harassment and Discrimination Prevention Policies

Vanderheyden strives to maintain a workplace environment free of harassment and discrimination and to communicate steps available for employees to utilize when they believe they have been subjected to inappropriate treatment under the Agency's policy.

All employees are covered under this policy both on and off the premises. Every person in the Agency must be treated with fairness, respect and dignity. The unfair treatment of employees, individuals we serve, vendors and third parties with whom the Agency has business dealings, will not be tolerated.

Harassment and discrimination may take many forms. Subjecting anyone to unwanted advances, intimidation, persistent inappropriate language or other inappropriate actions of any nature is harassment.

Treating an employee who is a member of a protected category identified above in the Agency's Equal Opportunity Statement in a disparate or unequal manner is discrimination. The consequences of harassment and discrimination are severe. In following a policy of fair treatment for all, Vanderheyden takes specific action against any person harassing, discriminating or otherwise acting inappropriately during, or in relation to, employment.

An employee who believes that they have been subjected to workplace harassment or discrimination by anyone is encouraged - but not required - to promptly tell the person that the conduct is unwelcome and ask the person to stop the conduct. A person who receives such a request must immediately comply with it and must not retaliate against the employee for rejecting the conduct.

Prevention of workplace harassment, which includes sexual and other forms of harassment, is supported by our Complaint/Non-retaliation policy.

Specifically prohibited behavior includes:

- making unwelcome advances or requests for favors which are sexual or gender-specific
- making verbal, physical or visual contact of a sexual or gender-specific nature
- making submission to this conduct or rejection of this conduct a basis for employment-related actions or decisions
- creating a hostile, offensive or intimidating work environment

Examples of prohibited gender-based contact include:

- offering or implying an employment-related reward (such as a promotion or raise) in exchange for sexual favors or submission to sexual conduct.

- threatening or taking a negative employment action (such as termination, demotion, denial of a leave of absence) when sexual or gender-specific conduct is rejected.
- unwelcome sexual or gender-specific advances or repeated flirtations.
- unwelcome intentional touching of another person or other unwanted intentional physical contact (including, but not limited to, patting, pinching, brushing against another person's body, or blocking a person's movement).
- unwelcome whistling, staring or leering at another person.
- asking unwelcome questions or making unwelcome comments about another person's sexual activities, dating, personal or intimate relationships, or appearance.
- unwelcome sexually suggestive or flirtatious gifts.
- unwelcome sexually suggestive or flirtatious letters, notes, emails, or voice mail.
- conduct or remarks that are sexually suggestive or that demean or show hostility to a person because of the person's gender (including, but not limited to, jokes, pranks, teasing, obscenities, obscene or rude gestures or noises, slurs, epithets, taunts, negative stereotyping or threats.)
- displaying or circulating pictures, objects, or written materials (including, but not limited to, graffiti, cartoons, photographs, pinups, calendars, magazines, figurines, novelty items, emails, postings on personal websites, social networks and similar forms of electronic expression) that are sexually suggestive or that demean or show hostility to a person because of the person's gender.

Other prohibited harassment includes verbal or physical conduct that denigrates or shows hostility or aversion toward an individual because of his or her race, color, national origin, age, religion, disability, genetic predisposition or carrier status, sexual orientation, military, marital or domestic violence victim status or any other status protected by applicable law.

Examples of other prohibited harassment include:

- threats, epithets, derogatory comments or slurs;
- derogatory posters, photographs, cartoons, drawings, gestures, email content, file transfers, and postings on personal websites, social networks, weblogs and similar forms of electronic expression;
- assault, unwanted touching or blocking normal movement
- harassing or discriminatory treatment of employees because of their association with members of a protected category.

Although Vanderheyden respects the right of employees to access and use personal websites, social networking sites and similar forms of electronic expression during non-working hours and off Vanderheyden premises, any use of such forms of electronic expression to harass or discriminate is unlawful and prohibited by this policy. (Also see Social Media Policy)

Workplace Violence Prevention Policy

The safety and security of employees is of the utmost importance to Vanderheyden. The Agency has adopted a Zero Tolerance Policy for workplace violence. Acts or threats of physical violence including intimidation, coercion, and/or harassment, which involve or affect employees, visitors, guests or other individuals will not be tolerated. Violations of this policy may lead to disciplinary action including dismissal, arrest, and prosecution.

The Agency will continually strive to prevent and minimize the potential of violence in the workplace. The prohibition against threats and acts of violence applies to all persons involved in the Agency's operation, including but not limited to regular personnel, contract and temporary workers, and anyone else on the property, attending Agency-sponsored events, and conducting Agency business.

Employees are prohibited from possessing firearms or weapons of any kind while on the premises; in Agency or personal vehicles while conducting business for the Agency; or at any other location during working hours or while representing Vanderheyden.

Agency-owned or controlled property is defined as the space in any building, including the parking and outside areas of buildings, where Vanderheyden is an owner or tenant and maintains a business presence.

Agency-sponsored event is defined as one which is promoted and communicated by Vanderheyden through both formal and informal means.

Conducting Agency business includes but is not limited to visits to customer and vendor sites, attendance at conferences and trade shows, and other business activity that may be conducted at hotels, restaurants or other meeting places.

Any person who makes threats, exhibits threatening behavior, or engages in violent acts on Agency property shall be removed from the premises as quickly as safety permits, and shall remain off Agency premises pending the outcome of an investigation. Possible outcomes may include, but is not limited to, disciplinary action including warnings, dismissal, and/or termination of any business relationship, arrest and/or criminal prosecution of the person or persons involved.

All employees are responsible for notifying their manager or Human Resources of any threats that they have witnessed, received or have been told that another employee has witnessed or received, whether on or off the premises. Even without an actual threat, employees should also report to a manager or Human Resources any behavior they have witnessed which they regard as threatening or violent, when that behavior might be carried out on an Agency-controlled site, or at an Agency-sponsored event, or when that behavior might occur between employees off the premises.

Employees are responsible for making a report, without fear of retaliation, regardless of the relationship between the individual who initiated the threat or threatening behavior and the person and persons who were threatened or were the focus of the threatening behavior.

All individuals who apply for or obtain a protective or restraining order which lists Agency locations as being protected areas must provide to Human Resources a copy of the petition and declarations used to seek the order, a copy of any temporary protective or restraining order which is granted, and a copy of any protective or restraining order which is made permanent.

Complaint Procedure/Non-Retaliation Statement

The complaint procedure provides several resources to which an employee may report harassment, workplace violence or discrimination. Employees who believe they have experienced or witnessed a job-related treatment they believe is harassing, violent or discriminating should contact a manager, the Human Resources Department or Corporate Compliance immediately.

All employees must inform a manager and/or the Human Resources Department immediately if approached by an employee alleging harassment, violence or discrimination.

We conduct an immediate and confidential (to the extent possible) investigation upon receipt of a report of harassment, violence or discrimination. We will take appropriate steps to protect the identity of the complainant, witnesses and the alleged harasser from unnecessary disclosure.

The procedures of fair treatment when we investigate:

- Report the incident first to the manager, the Human Resources Department or Corporate Compliance.
- A comprehensive and confidential-as-possible investigation will begin.
- The investigator will interview the employee, the accused harasser and witnesses, if appropriate.
- An employee, who is found after an appropriate investigation to have engaged in harassing, workplace violence or discriminatory treatment of another employee, will be subject to appropriate disciplinary action.

No employee will be subjected to discipline, or any other adverse treatment, because they have made a complaint of harassment, workplace violence or discrimination. The individual making the complaint receives an appropriate response when the investigation has ended. Any employee who is not satisfied with the Agency's response to their original complaint is required to report their dissatisfaction to the President and Chief Executive Officer within five business days of being notified of the final decision.

We follow all procedures of fair treatment when we investigate a complaint. All complaints will be promptly and discreetly investigated by a member of management if not involved in the alleged

incident and/or the Human Resources Department. The result of the complaint investigation is designed to stop any conduct deemed inappropriate and prevent any future occurrences.

Persons who are found to have engaged in harassment, violence, discrimination or inappropriate conduct will be subject to corrective disciplinary action up to and including employment termination. The Agency reserves the right to take disciplinary action in cases of inappropriate behavior even when that behavior does not amount to a violation of the law or our policy.

Employees can raise concerns or make reports without fear of retaliation. Retaliation includes any conduct, whether or not workplace or employment-related, directed at someone because he or she opposed a discriminatory practice, made a complaint of discrimination, or participated in such an investigation, which might deter a reasonable worker from making or supporting a charge of harassment or discrimination.

Vanderheyden is committed to ensuring that no employee who makes a complaint and no witness who participates in an investigation will be subject to adverse treatment in our workplace. The Agency prohibits retaliation of any kind, in or out of the work environment and will not tolerate it. All parties involved in an investigation will be reminded of this during the investigation. Any individual found to have engaged in retaliation will be subject to disciplinary action, up to and including termination of employment.

We trust that all employees will act in a professional and responsible way toward other employees to maintain a pleasant working environment free of discrimination or harassment. Vanderheyden wants individuals who make complaints and serve as witnesses, to inform Human Resources or Corporate Compliance if they have received treatment they believe is retaliatory. Allegations of retaliation will be promptly investigated by the Agency. Individuals, who have committed acts of retaliation, will be subject to discipline, up to and including termination.

EMPLOYMENT

Application for Employment

Only the President and Chief Executive Officer or designee, shall enter into an agreement for employment for a specified period of time, or to make any agreement contrary to this policy. Additionally, any such agreement must be in writing and must be signed by the President and Chief Executive Officer.

Every person seeking a job at Vanderheyden will have to complete an employment application and obtain satisfactory outcomes throughout the Agency's hiring process. Information regarding protected status obtained through social media, or any other source, is not considered in our hiring decisions.

Eligibility to work in the United States

An employee must complete a Department of Homeland Security's *I-9 Form* on the first day of work. If an individual cannot verify his/her right to work within three days of hire, the Agency must terminate his/her employment.

Background Checks

Candidates, as a condition for employment, are required to consent to an extensive background investigation including, but not limited to, a check of the applicant's license/certification, education and experience. Vanderheyden will comply with the Fair Credit Reporting Act and applicable state laws when conducting employment background checks, including providing the job candidate or employee with any required notices. Information regarding protected status obtained through social media, or any other source, is not considered in our hiring decisions.

Fit for Duty-Physicals/PPD

As a condition of employment and annually, all employees must have a fit for duty physical examination to determine that an individual is physically able to perform his/her essential job duties. Employees with health insurance should have their physical exam completed by their doctor and the Agency will reimburse the employee for his or her co-pay. Employees who do not have health insurance should be directed to the designated Agency provider with the signed waiver form to have the Agency cover the cost of the physical exam. Failure to comply with this requirement within thirty days of one's anniversary date is considered justification for suspension or termination.

Consistent with the American Disabilities Act, the Agency will make reasonable accommodation wherever necessary for all qualified employees or applicants with disabilities, provided that any accommodation made does not impose an undue hardship on the Agency.

Motor Vehicle Record (MVR) Inquiry

Prospective employees expected to drive on behalf of the Agency, both on campus and off campus, must provide the Agency with current and acceptable motor vehicle driving information. Employment and job assignment will be conditional pending the receipt of a satisfactory report from the State Department of Transportation or Division of Motor Vehicles, and other state and federal databases.

Throughout their employment, all employees who work in a driving related position will maintain a current New York State Driver's license, which is free from any traffic violations.

If an employee receives a ticket for a moving violation, the employee is required to notify their manager and Human Resources within 3 business days of the ticketing offense. Driving privileges for Vanderheyden may be revoked until further notice, and may also impact continued employment.

Criminal Convictions

Applicants must inform the Agency of criminal convictions as a pre-condition of employment. Unfair discriminatory practices against applicants or employees previously convicted of one or more criminal offenses are prohibited. Vanderheyden cannot deny employment or act adversely in relation to employment regarding such individuals, unless: a.) There is a direct relationship between a criminal offense and the position to be held by the applicant or currently held by the employee; or b.). Granting employment or other employment-related opportunity would involve unreasonable risk to Agency property or the safety or well-being of employees or the general public.

In January of 1986 and in December of 1987 the New York State Department of Social Services distributed "Guidelines for Evaluating Applicants with Criminal Records". Regulations contained in 18 NTCRR: 442, 1 8(e); 448.3(b)(5)(d); and 447.2(a)(2) require and allow agencies the right to obtain criminal checks on prospective employees and volunteers under section 378-a of the Social Services Law.

Vanderheyden will not allow employees or volunteers who are on parole, probation or who have been convicted of a felony offense to work with the individuals in our care except in extraordinary circumstances. Information about the Agency's Criminal Convictions Policy is available from your manager or the Human Resource Office.

Employee Definitions:

Regular, full-time employees are those employees who work at least 40 hours per week and maintain continuous employment status.

Regular part-time employees work less than 40 hours per week* on a schedule approved by their manager.

Per Diem employees work less than 20 hours per week and are scheduled to fill in open schedules or call outs.

Temporary or seasonal employees, may work full-time or part-time and are hired for a particular project or a finite period of time.

*Definitions may vary for Instructional employees and employees under collective bargaining agreement.

“Non-Exempt” Employees - at the time you are hired, the position for which an employee was hired is classified as either “exempt” or “non-exempt”. Federal and State law mandates that employees with certain duties are entitled to overtime pay for hours worked in excess of forty (40) hours per work week. These employees are referred to as “non-exempt” and receive overtime pay at a rate of 1.5 times their regular rate of pay. Administrative personnel who are in non-managerial roles are generally recognized as “non-exempt”. They are governed by prevailing overtime regulations in accordance with federal and state regulations.

“Exempt” Employees - are employees who are exempt from the Federal and State law’s minimum wage and overtime requirements. Only bona fide executive, administrative, professional and outside sales employees who meet certain requirements are classified as “exempt” status. For example, managers, and directors, who are employed in managerial roles, are exempt from overtime regulations as stipulated in the Fair Labor Standards Act. If you are an “exempt” employee, you will be advised that you are in this classification at the time you are hired, transferred or promoted.

Any questions regarding your job classification or employment status may be directed to Human Resources or Corporate Compliance without fear of retaliation.

Volunteers

Vanderheyden encourages volunteerism within the Agency. Employees who wish to be involved with certain Vanderheyden activities during non-working hours must be registered volunteers. Please refer to the Operations and Policy Manual for further details on being a volunteer while employed with the Agency.

Rate of Pay Acknowledgement

All new hires will receive in writing their rate of pay and regular pay day. For non-exempt, overtime-eligible employees, the notice will include the regular hourly rate as well as the overtime rate.

Arrest or Incarceration During Employment

Vanderheyden has a strong commitment to provide a healthy, safe, and secure environment for all employees and individuals served. To ensure that this type of environment exists, it is imperative that all employees present themselves as positive role models for the individuals served as well as the Agency as a whole by upholding the law.

Employees must notify their manager or Human Resources immediately if he or she is arrested and keep the Agency informed regarding the details of the arrest and the legal process that is occurring. The Agency may decide to terminate employment when employees do not call or show up for work due to an arrest or incarceration.

Promotions, Transfer, Demotions, and Union Seniority

Vanderheyden strives to provide the maximum advancement potential for current employees and to make nonprofit employment attractive to qualified individuals. Promotions are granted without regard to race, color, religion, gender, age, national origin, disability, marital or domestic violence victim status, sexual orientation, genetic predisposition or carrier status, veteran status or any other protected characteristic as established by federal and state law.

If you are covered by terms of a collective bargaining agreement, seniority drives many of the decisions regarding promotions and transfers. Seniority is defined as the length of time one has served in a job or worked for an organization. Please refer to your agreement.

The President and Chief Executive Officer or their designee shall approve or disapprove all promotions, transfers, and demotions.

Grievance

All employees of Vanderheyden not covered by terms of a collective bargaining agreement may utilize the Agency's Appeals Procedure if they have a serious problem relating to their job. This includes but is not limited to concerns about: pay, job assignments, performance appraisal, and disciplinary actions. The purpose of this Procedure is to give each employee the opportunity to have his/her concerns and complaints properly reviewed and addressed by members of management. The Procedure is as follows:

Step I: All grievances should be made in writing and sent immediately to the Human Resources Department. Human Resources is available to review the following grievance steps.

Step II: If an employee feels that he/she has been treated in a fashion that is unjust or has been affected by an action that is not in the best of interests of the Vanderheyden community, he/she may request of his/her manager the opportunity for a private discussion. Following this discussion, if the employee feels that a satisfactory resolution of the issue has not been reached, he/she may request that the matter be addressed at Step III.

Step III: At this step an employee is given the opportunity to meet with the individual whom his/her manager directly reports. This meeting is intended to insure that all parties to the concern fully recognize applicable Agency policy, and have fully considered all aspects of the issue. If the employee remains unsatisfied with the position of Agency management, he/she may refer the matter to Step IV.

Step IV: If the individual with whom the employee addressed his concern in Step II was not a Department Manager, the matter may be referred to this level in Step V.

Step V: The final step in the procedure entails meeting with the President and Chief Executive Officer and/or a member of the Board of Directors. The decision rendered by the President and Chief Executive Officer or the Board is and will be, if necessary, an effort to address all aspects of the concern raised to date.

Employees with grievances related to discrimination, harassment or violence should refer to policies in the Compliance Section of this handbook and follow the complaint/anti-retaliation procedures accordingly.

Personnel Files

All hiring records, employee data, payroll information and employment history must be kept in the central file maintained by Human Resources. Employee files are the property of the Vanderheyden and access to the information they contain is restricted.

In order to protect the privacy of the Agency's employees, information in an employee's personnel file is considered confidential. Access to such information is limited to the employee's immediate manager, senior manager and Human Resources.

A current employee may review his or her file while accompanied by a member of Human Resources and upon written request with reasonable notice.

HIPAA regulations will be followed in administrative activities undertaken by assigned personnel when they involve personal health information in any of the following circumstances: health information privacy, health information security and health information electronic transmission. Medical records are kept separate from employee files and may be reviewed by providing a written request to the Human Resource Office. This request must be submitted through the appropriate Department Director who will forward it to the Human Resource Office.

Vanderheyden will consider any breaches in the privacy and confidentiality of handling of PHI to be serious, and disciplinary action may be taken in accordance with our code of conduct.

Misuse or improper appropriation of information of any employee's personnel file will subject the individual to dismissal and/or other appropriate legal remedies.

Employee Information

Employees are asked to help keep the Agency informed about any major change that may affect their employment status. Important changes to report to Human Resources include:

- Change in credentialed or licensing status
- Name, Address, and all telephone numbers
- Marital status
- Change of beneficiary
- Number of dependents
- Authorized payroll deductions
- Emergency contact and telephone numbers

- Additional education and special training courses completed

Failure to inform the Agency of these changes may cause delays in payments or loss of benefits.

COMPENSATION

Administrative Work Schedules

Normal business hours are from 8:30 a.m. to 4:30 p.m. Monday through Friday.

The work schedule is given to each employee by Human Resources upon hire. Work hours are assigned by his/her manager and are based on the requirements of the position. Working hours may be altered on occasion as the needs of the Agency change. Questions regarding work schedules, or shift questions should be directed to your manager.

Some positions at Vanderheyden may accommodate a flexible work schedule. If an employee is interested in a change in their work schedule, please submit a written request with justification. Senior management will review the proposal on a regular basis, and approve the request in writing based on the appropriateness of the position and overall needs of the Agency.

Employees are expected to be punctual and demonstrate reasonable flexibility in adapting to work schedule requirements to fully meet the needs of the individuals we serve. It is recognized that in exceptional instances employees may not be able to get to work because of emergency conditions such as impassible roads. All efforts should be made to come to work, without endangering their personal safety.

Employees whose positions are covered by a collective bargaining agreement are subject to the specific provisions that pertain to work schedules, flexible work schedules and punctuality.

Direct Support, Educational and Professionals Work Schedules

The Agency has 3 different work schedules that an employee may work. Work schedules are assigned by the manager. Work schedules vary and occur during the day, evenings, nights and weekends. The work day begins once an employee commences their duties and ends only when relieved by the next employee. Work schedules are subject to change as necessary according to job duties and may include any of the seven (7) days of the week and/or evenings.

Supervision and Coaching

Every employee is provided the opportunity to meet on a regular basis with his/her supervisor as a regular check on performance expectations and completion and to provide for a formal face-to face meeting to ensure open communication. Supervision is an important management function that ensures that our mission is served and that work gets done in an efficient, effective and timely manner. Supervisors make the effort to get to know their staff, to understand their employee's goals and views, to help to develop their skills and career objectives, to safeguard their health and safety while on the job, and to provide guidance and leadership. Supervisors provide ongoing coaching and constructive feedback to employees as well as recognition for good performance.

Employees shall receive face to face supervision at least once every other week and shall focus on three areas:

- The employee's issues or concerns
- The supervisor's issues or concerns and constructive feedback on the employee's performance
- Professional growth and skill building and communication of information

Working From Home

Telecommuting employees (working from home) are responsible for designating and maintaining a workplace that is free from recognized hazards and that complies with all occupational safety and health standards, rules, and regulations. This includes setting up and maintaining an ergonomically correct workstation. Employees requiring assistance in this regard should contact their Manager.

To ensure that safe work conditions exist and that other Agency policies are met, telecommuters must allow Agency management to inspect their designated workplace at any time between 9:00 a.m. and 5:00 p.m. on any regularly scheduled workday. The Agency reserves the right to request the telecommuting employee to send a photo of the worksite.

Equipment and Supplies - Vanderheyden provides telecommuting employees with the equipment to be used in their home office or remote office. Telecommuters must use Agency equipment for its intended purpose, in accordance with the manufacturer's instructions, and in a safe manner.

Vanderheyden is responsible for the installation and routine maintenance of all Agency-owned or Agency-leased office equipment, and furniture. Agency-owned or Agency-leased items may be used only by authorized employees for Agency purposes.

All telecommuting equipment provided by Agency, including any software and information stored in the equipment, is the property of the Agency at all times even though located in a telecommuter's home or at another remote location.

Confidential Materials - In order to safeguard confidential Agency information, every telecommuter should take the following protective measures:

- At the end of each day, file all business records in locked filing cabinets.
- All electronic files must be saved on flash drives and a duplicate must be held in the office.
- Mark all documents containing trade secrets or confidential information as "CONFIDENTIAL."

Take all other steps necessary to protect the confidentiality of information regarding the individuals we serve, agency information, and all other confidential information.

Return of Company Property - When the telecommuting arrangement ends, for whatever reason, all Agency property, files, supplies and work products must be returned as soon as possible. Efforts should be taken to insure company property is returned safely and without damage.

Meal Times

Positions that require oversight in the residential programs are required to eat meals with the individuals we serve. Accordingly, those meals are provided at no cost to the employee, and meal times are paid hours.

All other positions outside the residential programs must take up to 30 minutes of time for lunch. Employees working 6 hours or more after the last meal break must take an additional 30 minutes of time for a meal break.

Break Times

Unless covered by a collective bargaining agreement, employee breaks including those in residential programs are granted according to the number of hours worked each day. Breaks are paid and limited to 15 minutes and cannot be taken unless there is sufficient coverage.

Time Records

Federal and state regulations require the Agency to maintain accurate records of employee work hours. Accurate time records allow the Agency to calculate each employee's compensation for time worked and all authorized paid and unpaid leave taken in a given workweek. Accurate time records are also tied to the Agency's ability to apply for reimbursement funding. Time worked is all time actually spent on the job performing assigned duties.

Non-exempt employees must record all worked hours as per Company practice. A non-exempt employee must submit their time at the beginning and end of the work schedule, and for all unpaid meal periods utilizing the Agency's time keeping system. Vanderheyden has no expectation that non-exempt employees will perform work, including responding to e-mail, voicemail, or texts, while on any form of leave, and that if a non-exempt employee performs work, the employee must obtain advance authorization and the employee must track the time.

Exempt employees, whose hours are reimbursable for funding, must use the time recording system to record their work hours. Other Exempt employees are not required to formally record work hours, but all employees must account for authorized paid and unpaid leave taken by using the time recording system. This includes time off to conduct personal business during the workday, which cannot otherwise be accomplished during the employee's regular meal period.

All employees must approve their recorded time or accuracy. Department Managers must then review and approve employee's time records in the system prior to processing by Payroll to confirm accuracy, and ensure that any approved paid leave benefits have been properly documented.

Any errors on an employee's time entered, such as failure to properly record all arrivals/departures in the time system, failure to properly record paid leave, etc., should be brought to the attention of the Manager immediately. The Manager will investigate the matter, and if verified, correct the employee's time prior to approval of the timecard. In the event an employee has a pay discrepancy from a prior pay period, the manager must authorize the correction and send a written authorization to Payroll for correction and processing. Corrections to pay are generally made in the following pay period.

Failure to submit, altering, falsifying, or tampering with an employee's own time record, or that of a co-worker's, is prohibited and may result in disciplinary action, up to and including termination of employment for both employees.

Overtime Compensation

Nonexempt employees will be paid at the rate of one and one-half times their regular hourly rate of pay for all time worked in excess of 40 hours in any one workweek. The workweek begins on Wednesday at 11:00 p.m. and ends the following Wednesday at 10:59 p.m. All forms of unpaid and paid leave are not counted in overtime calculations. Paid meal breaks are counted in overtime calculations. Overtime is never at the employee's discretion. It shall only be incurred and paid by the Agency through the approval of the employee's manager. Managers shall ensure that no unauthorized overtime hours are worked.

Pay Checks

Employees may have their pay directly deposited to either checking or savings accounts, or both, with the financial institution of choice. Contact the Payroll Department for additional information.

All employees are paid every other Wednesday. Pay checks are available to be picked up on pay day in the Business Office. Pay statements are available on the Employee Portal. This check covers a two-week period ending on the previous Wednesday. Paychecks cannot be issued in advance.

Any questions about paychecks should be directed to your manager, who will contact the Payroll Department.

Travel Expenses

The Agency will pay "reasonable" pre-approved expenses that have been authorized. Expenses will not be reimbursed unless the individual requesting reimbursement submits an Agency Expense Form. The Expense Form should be submitted within two weeks after incurring the expense. Your manager approves expense forms and signs off the written reports to be paid. Mileage is reimbursed at the current IRS rate. Mileage to/from home is not time worked and is not reimbursable mileage. Receipts are required for all reimbursable expenses. No expense in excess of \$25.00 will be reimbursed to an employee unless it is submitted with the written receipt from each vendor (not a credit card receipt or statement) showing the vendor's name, a description of the services provided, the date and total expenses, including tips. Questions regarding Travel Expenses may be directed to the Chief Financial Officer.

ATTENDANCE AND ALL FORMS OF LEAVE

Punctuality & Absences From Work

Due to the uniqueness of our Agency, we depend on each other for successful functioning of our departments. Our mutual success depends on providing vital services to our individuals. To ensure these services, we ask you to be on time and at work every day that you are scheduled to work.

If you are going to arrive late to work, please notify the manager on duty as soon as possible prior to your starting time so that alternative temporary arrangements can be made. This policy is especially important in the residential programs where proper coverage is critical.

Employees who have been absent for three (3) or more consecutive work days due to an injury or illness shall present medical certification to your manager on the first day back to work. Special considerations, work restrictions, the length of the absence and the nature of the illness or injury should be noted. (See Medical Leave and Family Medical Leave policies)

Adherence to the above guidelines is required of all employees, and failure to do so will be addressed through appropriate action. Employees whose positions are covered by a collective bargaining agreement are subject to the specific provisions of the arrangement that pertain to punctuality and attendance.

Abandonment of Job

Employees who miss work for three (3) consecutive days without notifying their manager, or have three (3) consecutive days of unexcused absences, are considered to have resigned their job.

Inclement Weather and Emergencies

Vanderheyden operates 365 day/year, 24 hours per day and it is necessary to maintain staff and crisis back up in order to maintain safety and program needs of those we serve. When inclement weather or emergencies occur, every attempt needs to be made by staff to come to work to ensure that there is constant supervision of the individuals we serve.

Employees whose positions are covered by a collective bargaining agreement are subject to the specific provisions that pertain to inclement weather and emergencies.

Holidays

Unless otherwise provided for a limited by a collective bargaining agreement, the following Holidays are observed by all employees:

New Years' Day	Memorial Day	Columbus Day	Christmas Day
Martin Luther King Day	Independence Day	Veteran's Day	
President's Day	Labor Day	Thanksgiving	

Employees are encouraged to take the holiday off on the specific holiday date. Employee's holiday pay will resemble hours normally worked on that day. Due to the nature of the work, some employees may be required to work on certain holidays. A compensating day off will be given in that event.

Paid Hours Off, Vacation, Sick, and Personal Paid Time Accruals

Please refer to the appropriate Benefits Summaries and/or Bargaining Unit Agreement for paid hours off (PHO), vacation and sick hour's accrual schedule and allotted personal time. Benefit summaries can be located on the Vanderheyden Employee Information Network (the V.E.I.N.) or request from Human Resources. All Paid Time Off leaves must be pre-approved by management. PHO, Vacation and sick pay is accrued monthly on the first pay day each month. PHO, Vacation and Sick pay can be taken in hourly increments. Only accrued vacation pay and a limit of PHO is paid upon termination under certain criteria outlined in the Employment – Separation, Section of this Handbook or the bargaining unit agreement.

Medical Leaves

The Agency recognizes that there may be instances when employees may require time off from their jobs for medical leave. Employees absent for more than three days must provide medical documentation for their absence.

We may also require employees who are absent frequently or at consistent times to provide medical documentation upon our request. Medical documentation will be required for all medical leaves and information must be directed to the Human Resources Department.

Medical Leave is unpaid, except if an employee elects to use their accrued time. The Agency will continue paying health insurance premiums, however, reimbursements for the employee's share of health insurance premiums must be paid by making arrangements with Human Resources.

Disability- To file a non-work related disability claim, it is the responsibility of the employee to request a Disability Form from the Human Resources Department. The employee is responsible for having the form completed by the Agency, associate and physician. Vacation and Wellness Leave (if available) may be used for this type of leave.

Workers' Compensation- Any injury, no matter how minor it appears, must be reported immediately to management with an Employee Incident Report. The Agency will file the required paperwork with the insurance company. Payment should not be made for medical expenses until the insurance company's determination of benefits. The employee will be paid for hours worked that day, and then must wait 7 days until benefits begin or utilize their accrued time.

During any period of disability, you or your physician need to regularly communicate with management, (at least every month) to keep the Agency informed of any changes in your condition and your expected date of return. If an employee does not return on the expected date, the Agency will assume the employee has voluntarily quit.

Employees returning from a medical disability or Worker's Compensation leave may be required to provide a Fitness for Duty examination or medical documentation before returning to work. The Agency may find it necessary to fill the employee's position while on leave. In this instance, employment with the Agency may end. When able to return to work, former employees are welcome to reapply subject to the Agency's usual hiring policies.

For the safety and well-being of employees, employees who develop an illness or physical condition which requires medical treatment or restrictions and precautions as to their health will be required to submit a physician's statement. This statement must give assurance that continued full-time employment in their present position will not jeopardize their health or the safety of others, in the event they continue to work. A similar statement is required upon return from a disability leave.

This medical leave policy does not apply if medical leave is needed as a result of self-inflicted injury, illegal substance abuse or alcohol abuse, or illness or injury incurred while in the act of committing a felony.

Should your attendance or job performance suffer during the period preceding and/or following a disability leave, we will reasonably accommodate you to the extent provided by law.

Employees must provide medical documentation to return to work from any work-related injury or an absence for which they qualify for Workers' Compensation or NYS Disability Insurance. According to the Americans with Disabilities Act and New York State Human Rights Law, the Agency tries to make reasonable accommodation for a temporary or permanent disability as defined within the laws.

Family and Medical Leave Act (FMLA)

The function of this policy is to provide employees with a general description of their FMLA rights. In the event of any conflict between this policy and the applicable law, employees will be afforded all rights required by law. If you have any questions, concerns or disputes with this policy, you must contact the Human Resources Department in writing.

General Provisions - Under this policy, Vanderheyden will grant up to 12 weeks (or up to 26 weeks of military caregiver leave to care for a covered service member with a serious injury or illness) during a 12-month period to eligible employees. The leave may be paid, unpaid or a combination of paid and unpaid leave, depending on the circumstances of the leave and as specified in this policy.

Eligibility - To qualify to take family or medical leave under this policy, the employee must meet the following conditions:

- The employee must have worked for the Agency for 12 months or 52 weeks. The 12 months or 52 weeks need not have been consecutive. For eligibility purposes, an employee will be considered to have been employed for an entire week even if the employee was on the payroll for only part of a week or if the employee is on leave during the week.
- Instructional workers have different eligibility based on the time of the school year. See Human Resources for provisions specific to Instructional workers.

- The employee must have worked at least 1,250 hours during the 12-month period immediately before the date when the leave is requested to commence.
- The employee must work in a work site where 50 or more employees are employed by the Agency within 75 miles of that office or work site.

Type of Leave Covered - To qualify as FMLA leave under this policy, the employee must be taking leave for one of the reasons listed below:

- The birth of a child and in order to care for that child.
- The placement of a child for adoption or foster care and to care for a newly placed child.
- To care for a spouse, child or parent with a serious health condition (described below).
- The serious health condition (described below) of the employee.
- An employee may take leave because of a serious health condition that makes the employee unable to perform the functions of the employee's position.

A serious health condition is defined as a condition that requires inpatient care at a hospital, hospice or residential medical care facility, including any period of incapacity or any subsequent treatment in connection with such inpatient care or as a condition that requires continuing care by a licensed health care provider.

This policy covers illnesses of a serious and long-term nature, resulting in recurring or lengthy absences. Generally, a chronic or long-term health condition that would result in a period of three consecutive days of incapacity with the first visit to the health care provider within seven days of the onset of the incapacity and a second visit within 30 days of the incapacity would be considered a serious health condition. For chronic conditions requiring periodic health care visits for treatment, such visits must take place at least twice a year.

Employees with questions about what illnesses are covered under this FMLA policy or under the Agency's sick leave policy are encouraged to consult with the Human Resource Manager.

If an employee takes paid sick leave for a condition that progresses into a serious health condition and the employee requests unpaid leave as provided under this policy, the Agency may designate all or some portion of related leave taken as leave under this policy, to the extent that the earlier leave meets the necessary qualifications.

Qualifying exigency leave for families of members of the National Guard or Reserves or of a regular component of the Armed Forces when the covered military member is on covered active duty or called to covered active duty.

An employee whose spouse, son, daughter or parent has been notified of an impending call or order to covered active military duty or who is already on covered active duty may take up to 12 weeks of leave for reasons related to or affected by the family member's call-up or service. The qualifying exigency must be one of the following: a) short-notice deployment, b) military events and activities, c) child care and school activities, d) financial and legal arrangements, e) counseling, f) rest and recuperation, g) post-deployment activities, and h) additional activities that arise out of active duty,

provided that the employer and employee agree, including agreement on timing and duration of the leave.

Covered active duty means:

- In the case of a member of a regular component of the Armed Forces, duty during the deployment of the member with the Armed Forces to a foreign country.
- In the case of a member of a reserve component of the Armed Forces, duty during the deployment of the member with the Armed Forces to a foreign country under a call or order to active duty under a provision of law referred to in Title 10 U.S.C. §101(a)(13)(B).
- The leave may commence as soon as the individual receives the call-up notice. (*Son* or *daughter* for this type of FMLA leave is defined the same as for *child* for other types of FMLA leave except that the person does not have to be a minor.) This type of leave would be counted toward the employee's 12-week maximum of FMLA leave in a 12-month period.
- Military caregiver leave (also known as covered service member leave) to care for an injured or ill service member or veteran.
- An employee whose son, daughter, parent or next of kin is a covered service member may take up to 26 weeks in a single 12-month period to take care of leave to care for that service member.
 - *Next of kin* is defined as the closest blood relative of the injured or recovering service member.

The term *covered service member* means:

- A member of the Armed Forces (including a member of the National Guard or Reserves) who is undergoing medical treatment, recuperation or therapy or is otherwise in outpatient status, or is otherwise on the temporary disability retired list, for a serious injury or illness.
- A veteran who is undergoing medical treatment, recuperation or therapy for a serious injury or illness and who was a member of the Armed Forces (including a member of the National Guard or Reserves) at any time during the period of five years preceding the date on which the veteran undergoes that medical treatment, recuperation or therapy.

The term *serious injury or illness* means:

- In the case of a member of the Armed Forces (including a member of the National Guard or Reserves), an injury or illness that was incurred by the member in line of duty on active duty in the Armed Forces (or that existed before the beginning of the member's active duty and was aggravated by service in line of duty on active duty in the Armed Forces) and that may render the member medically unfit to perform the duties of the member's office, grade, rank or rating.

- In the case of a veteran who was a member of the Armed Forces (including a member of the National Guard or Reserves) at any time during a period when the person was a covered service member, a qualifying (as defined by the Secretary of Labor) injury or illness that was incurred by the member in line of duty on an active duty in the Armed Forces (or that existed before the beginning of the member's active duty and was aggravated by service in line of duty on active duty in the Armed Forces) and that manifested itself before or after the member became a veteran.

Amount of Leave - An eligible employee may take up to 12 weeks for the first five FMLA circumstances above (under heading "Type of Leave Covered") under this policy during any 12-month period.

The Agency will measure the 12-month period as a rolling 12-month period measured backward from the date an employee uses any leave under this policy. Each time an employee takes leave, the Agency will compute the amount of leave the employee has taken under this policy in the last 12 months and subtract it from the 12 weeks of available leave, and the balance remaining is the amount of time the employee is entitled to take at that time.

An eligible employee can take up to 26 weeks for the FMLA military caregiver leave circumstance above during a single 12-month period. For this military caregiver leave, the Agency will measure the 12-month period as a rolling 12-month period measured forward. FMLA leave already taken for other FMLA circumstances will be deducted from the total of 26 weeks available.

If a husband and wife both work for Vanderheyden and each wishes to take leave for the birth of a child, adoption or placement of a child in foster care, or to care for a parent (but not a parent "in-law") with a serious health condition, the husband and wife may only take a combined total of 12 weeks of leave. If a husband and wife both work for the Agency and each wishes to take leave to care for a covered injured or ill service member, the husband and wife may only take a combined total of 26 weeks of leave.

Limitations for Instructional Employees - The amount of leave for eligible Instructional Employees are determined by when leave occurs within the school's semester. Special rules apply and leave may be limited.

Employee Status and Benefits During Leave - While an employee is on leave, the Agency will continue the employee's health benefits during the leave period at the same level and under the same conditions as if the employee had continued to work provided that the employee portion of the cost is paid to the Agency.

Employee Status After Leave - An employee who takes leave under this policy may be asked to provide a fitness for duty (FFD) clearance from the health care provider.

Use of Paid and Unpaid Leave - All paid vacation and accrued leave runs concurrently with FMLA leave.

Disability leave for the birth of a child and for an employee's serious health condition, including workers' compensation leave (to the extent that it qualifies), will be designated as FMLA leave and will run concurrently with FMLA.

Intermittent Leave or a Reduced Work Schedule - The employee may take FMLA leave in 12 consecutive weeks, may use the leave intermittently (take a day periodically when needed over the year) or, under certain circumstances, may use the leave to reduce the workweek or workday, resulting in a reduced-hour schedule. In all cases, the leave may not exceed a total of 12 workweeks (or 26 workweeks to care for an injured or ill service member over a 12-month period).

Certification for the Employee's Serious Health Condition - Vanderheyden will require certification for the employee's serious health condition. The employee must respond to such a request within 15 days of the request or provide a reasonable explanation for the delay. Failure to provide certification may result in a denial of continuation of leave.

Certification for the Family Member's Serious Health Condition - The Agency will require certification for the family member's serious health condition. The employee must respond to such a request within 15 days of the request or provide a reasonable explanation for the delay.

Failure to provide certification may result in a denial of continuation of leave.

Certification of Qualifying Exigency for Military Family Leave - The Agency will require certification of the qualifying exigency for military family leave. The employee must respond to such a request within 15 days of the request or provide a reasonable explanation for the delay. Failure to provide certification may result in a denial of continuation of leave.

Certification for Serious Injury or Illness of Covered Service Member for Military Family Leave - The Agency will require certification for the serious injury or illness of the covered service member. The employee must respond to such a request within 15 days of the request or provide a reasonable explanation for the delay. Failure to provide certification may result in a denial of continuation of leave.

Recertification - The Agency may request recertification for the serious health condition of the employee or the employee's family member when circumstances have changed significantly, or if the employer receives information casting doubt on the reason given for the absence, or if the employee seeks an extension of his or her leave. Otherwise, the Agency may request recertification for the serious health condition of the employee or the employee's family member every six months in connection with an FMLA absence.

Procedure for Requesting FMLA Leave - All employees requesting FMLA leave must provide the HR manager with verbal or written notice of the need for the leave. Within five business days after the employee has provided this notice, the HR manager will provide the employee with the DOL Notice of Eligibility and Rights.

When the need for the leave is foreseeable, the employee must provide the employer with at least 30 days' notice. When an employee becomes aware of a need for FMLA leave less than 30 days in

advance, the employee must provide notice of the need for the leave either the same day or the next business day. When the need for FMLA leave is not foreseeable, the employee must comply with the company's usual and customary notice and procedural requirements for requesting leave.

Designation of FMLA Leave - Within five business days after the employee has submitted the appropriate certification form, the HR manager will provide the employee with a written response to the employee's request for FMLA leave.

Intent to Return to Work from FMLA Leave - Vanderheyden may require an employee on FMLA leave to report periodically on the employee's status and intent to return to work.

Leave of Absence

A Leave of Absence is an extended period of unpaid time away from one's job for a compelling personal reason or if the employee is not eligible for Family Leave or Family Medical Leave. Unless otherwise provided for or limited by a collective bargaining agreement, leaves of absence are granted in accordance with the following guidelines:

Birth of a Child - An employee who becomes pregnant and is not eligible for Family Leave or FMLA leave may still be eligible to receive disability insurance payments as described in the NYS Disability Insurance benefit in the Employee Benefits section of this Handbook. In addition, following the birth of a child, an employee may request an unpaid leave of absence up to ninety (90) days.

Care Givers - An employee who must attend to family needs for emergency care or critical illness and have exhausted Family Leave may request a leave of absence. The nature of the care given and the length of the absence will influence the decision of the Agency to grant or not grant the requested leave of absence.

All requests for Leaves of Absence must be submitted in writing to the appropriate Department Director. Approval of each request will be based on applicable legal requirements, the justification of individual circumstances and the operational requirements of the Agency. To continue insurance benefit coverage during a leave of absence, employees must make arrangements with the Human Resources prior to commencing the leave.

Leaves of Absence may not be taken without the approval of the Department Director and the President and Chief Executive Officer.

Employees returning from a granted leave of absence will be returned to their previous position or to a position of comparable responsibilities and equivalent compensation. Job protection is not guaranteed for non-FMLA leave of absences.

Military Leave

Vanderheyden is committed to protecting the job rights of employees absent on military leave. In accordance with federal and state law, it is the Agency's policy that no employee or prospective employee will be subjected to any form of discrimination on the basis of that person's membership in or obligation to perform service for any of the Uniformed Services of the United States.

Specifically, no person will be denied employment, reemployment, promotion, or other benefit of employment on the basis of such membership. Furthermore, no person will be subjected to retaliation or adverse employment action because such person has exercised his or her rights under this policy. Vanderheyden will comply with all federal and state laws in terms of job reinstatement and benefits. Additionally, we will also honor time-off requirements for spouses of returning veterans.

If any employee believes that he or she has been subjected to discrimination in violation of this policy, the employee should immediately contact the manager responsible for the employee's division, or Human Resources Manager if the manager is unavailable.

Leave for Spouse of Member of Armed Forces

An employee who is the spouse of a member of the armed forces of the United States, National Guard, or reserves, must be allowed up to 10 days of unpaid leave when the employee's spouse who has been deployed during a period of military conflict to a combat theater or combat zone of operations is on leave from such combat service.

Jury Duty Leave

Unless otherwise provided for or limited by a collective bargaining agreement, the following Jury Duty Leave program is available to staff.

Vanderheyden will grant employees time off for mandatory jury duty or court appearances as a witness when the employee must serve or is required to appear as a result of a court order or subpoena. A copy of the court order or subpoena must be supplied to the employee's manager/manager when requesting time off.

The Agency covers the full pay for the first three days of jury duty. If an employee is selected for a case that exceeds 3 days, they may use any accrued paid time leave towards their unpaid jury duty.

Documentation for all court days must be provided. Employees are expected to return to work if you are excused from Jury Duty during your regular work schedule. Time off for court appearances as a party to any civil or criminal litigation is not compensated and the employee must arrange for time off without pay or use accrued paid leave for such appearances.

Witness Duty

You may take time off without pay to exercise your rights under state law as the victim of a crime or violation, or on account of your required attendance as a witness in a criminal proceeding. In this circumstance, an employee may apply their unused paid time off balance during leave. You are requested to notify your manager of the need to take time off as far in advance as is possible, but in no event later than on the date prior to taking witness or victim leave.

Bereavement Leave

It is recognized that the death of a loved one is a difficult experience necessitating time off from work to arrange and/or attend funeral services. After three months of employment employees are eligible to receive pay for time off related to the death of a family member. The Agency defines a family member as the grandparent, mother, father, step mother and father, child, sibling, spouse, committed partner, and primary care-giver. While personal circumstances vary, generally this entails payment for up to three (3) days absence. The above applies in all instances unless stipulated in a bargaining agreement.

Nursing Mothers Policy

Vanderheyden will provide break time for nursing female employees to express breast milk. Eligible employees will be provided daily breaks for up to 3 years after the birth of a child. Eligible, non-exempt employees are required to record the break on their time record.

Vanderheyden prohibits discrimination against employees who qualify for this break time and the Agency will make "reasonable efforts" to provide a nearby private room for employees to express breast milk.

Female employees are not permitted to return to work within four weeks after childbirth without medical certification. If a medical certification is required, the female employee is entitled to a female physician or a female witness.

Donating Blood

Employees who work an average of at least 20 hours per week are eligible for up to 3 hours of leave during any 12-month period for time off to donate blood. An employee must provide advance notice to his/her manager of his/her intention to take this leave. The Agency will not retaliate against any employee who requests or takes a leave of absence to donate blood. Employees may use accrued paid time off for this purpose.

Bone Marrow Donation

Employees who work an average of at least 20 hours per week are eligible for up to 24 work hours of leave for time off to donate bone marrow. An employee must provide advance notice to his/her manager of his/her intention to take this leave. The Agency will not retaliate against any employee who requests or takes a leave of absence to donate bone marrow. Employees may use accrued paid time off for this purpose.

Time Off for Voting

If an employee does not have sufficient time before or after working hours to vote in a public election, then the employee will be allowed time off to go to the polls. The Agency will pay an employee for up to the first two hours of absence from regularly scheduled work that is necessary to vote in a public election. Any additional time off for this purpose will be without pay.

Sufficient time is defined as four consecutive hours either between the opening of the polls and the beginning of the work shift or between the end of the working shift and the closing of the polls. An employee must give at least two days' notice to their manager of the need to have time off to vote.

COMPANY BENEFITS

Vanderheyden is pleased to provide benefits designed to meet the needs of its employees. This section contains only a summary of the various benefit plans. Please refer to the individual plan or policy for its specific terms and for the appropriate eligibility requirements. The terms of each plan govern the type, nature, and extent of coverage as well as eligibility for coverage under such plan or policy. Vanderheyden reserves the right to change or terminate all non-statutory employee benefits policies at any time, solely at its own discretion.

The information contained in this handbook regarding employee benefits is not a contract to provide these benefits to any employee. The eligibility requirements of these benefits are described in the summary plan documents and/or benefits booklets.

Regular, full-time or part-time employees (generally those working at least 20 hours per week) are eligible for most benefits provided by Vanderheyden if they meet specific requirements. **Some of these programs are required to be offered by the State or Federal status or collective bargaining obligations while others are voluntarily offered as part of our overall Compensation Program.** Vanderheyden Hall, Inc's benefit program renews annually, on January 1st. **During Open Enrollment period, all eligible employees must elect or decline their medical, dental, vision as well as a variety of voluntary insurances.** Employees also have the opportunity to enroll in a Flexible Spending Account which allows you to set aside pre-tax monies to help pay for any eligible medical or dependent care expenses.

Any questions concerning benefits and/or insurance claim information should be directed to Human Resources. The terms of the benefit plans described are subject to change at any time by the insurer(s) and/or Vanderheyden Hall.

Agency Provided Benefits

<u>Benefit Plans</u>	<u>Date of Eligibility</u>
Medical –pretax	Non Union Employees: First day of the month following date of hire DCW Union and Teachers Association Workers: First day of the month following the completion of sixty (60) days of employment
Dental – pretax	First of the month following date of hire
Vision – pretax	First of the month following date of hire
Health Reimbursement Account	Available to all eligible enrollees in the Medical Plan
Flexible Spending Account – pretax	First day after the third month of employment

Group Term Life/AD&D Insurance. Basic life insurance is provided at no cost to all eligible employees. Aetna Life Insurance is offered through the Business Council of New York State and provides coverage of two times the base annual pay to a maximum of \$200,000. If the death is due to an accident, the benefit is doubled. Please refer to the current year Benefits Summary for up to date information.

COBRA

The occurrence of certain events may cause the employee and/or the covered dependents to lose group health coverage. COBRA offers employees, spouses and dependent children the ability to continue existing health insurance coverage.

Cost for the coverage is paid completely by the employee effective at the time of the qualifying event. Employees must be enrolled in the health insurance plan at the time the qualifying event occurs.

Employees must meet qualifying conditions. At the time a qualifying event occurs, Human Resources will send employees enrollment information they must return to initiate coverage. The Human Resources Manager will answer questions about this program and will provide employees written details upon request or upon the occurrence of a qualifying event.

Employees cannot enroll in COBRA if they do not send the initial premium payment at the time specified in the enrollment letter. If the Agency does not receive the monthly premium payment by the date specified in the COBRA letter, coverage ceases and cannot be reinstated.

The determination of whether an employee is eligible for disability benefits is made by the insurance carrier. Eligible employees are paid a benefit after being out of work for seven (7) consecutive days. Eligible employees are covered for the period of disability specified by their physician, up to a maximum of twenty-six (26) weeks.

Flexible Spending Account (FSA)

The primary advantage to enrolling in an IRS approved Flexible Spending plan is to reduce your taxable income and to help offset your eligible out of pocket expenses. There are two types of FSA's offered: Health Care Flexible Spending Account and Dependent Care (Child Care) Spending Account. Eligible employees may enroll the first day after the third month of employment. Please see the plan document for details.

403(b) Retirement Plan

All eligible employees will be given enrollment materials and they may join immediately. Eligible employees must either enroll or waive participation in the plan. Employee contributions are fully vested and remain theirs upon termination. Vanderheyden will contribute 25% of the employees' contribution to a maximum of 3% of employees' gross annual earnings. The Agency's contribution is vested over time and in accordance to the schedule in the Plan Document.

Voluntary Benefits

We provide a range of voluntary benefits. Please refer to the Benefits Guide for a complete listing.

Employee Assistance Program (EAP)

Capital EAP provides assistance with family matters and consultations at no cost to the employee. The Employee Assistance Program helps find solutions to issues that are distracting employees from their performance at work and from finding happiness at home. Capital EAP offers basic support and counseling as well as guidance. Refer to the program for details.

Fit for Duty Annual Physical Exam/PPD

A Fit for Duty exam and a PPD is required for continued employment. The PPD is available at no cost to the employee, through Health Services Department. The Fit for Duty should be obtained through your health care provider – most health plans cover an annual exam in full. Every American is required under federal law to have health insurance coverage. If there is a co-pay, please see Human Resources for reimbursement.

Staff Recruiting Incentive

Vanderheyden staff that recruit employees will receive a compensation incentive as follows - \$50 after referral's successful completion of three (3) months, \$50 after referral's successful completion of six (6) months, and \$200 after referral's successful completion of one (1) year.

Only one referral per applicant is allowed. Executive Team members and above are not eligible to receive referral payments. Hiring Managers can not refer family members to their own departments. Internal transfers are not eligible for referral payments.

Banking

Direct deposit is available to most banks and financial institutions.

Tuition Reimbursement

To further develop staff skills, Vanderheyden encourages employees to continue their education. Education is intended to directly relate to the employee's job and Vanderheyden mission. If employees wish to enroll in college courses, they should discuss the matter with their manager prior to getting approval. The manager will submit the request for approval to the CFO. Payment will be made only when funds are available. To qualify, the employee has been a regular full-time employee for at least six months. Restrictions apply and reimbursement is made after certain grades are obtained. For more information, see Human Resources.

Professional Licenses/Memberships

Employees who are required to maintain professional licenses must provide proof of the current license held for continued employment. Reimbursement for the cost of professional licenses and/or memberships may be requested, subject to approval.

Mandated Benefits

New York State Disability Insurance (DBL) New York State Disability provides a weekly benefit of 50% of your weekly pay to a maximum of \$170.00 per week for a maximum payout of 26 weeks. This coverage is paid for by your employer.

Workers' Compensation If you are injured or become ill on the job, then you may receive, at no cost to you, workers' compensation insurance benefits which may include medical care, compensation, and vocational rehabilitation.

To receive workers' compensation benefits, you must report any work-related injury to your Manager immediately, no matter how minor, complete a written Employee Incident Report form and return it to Human Resources and seek medical treatment and follow-up care if required. No payment required.

State law imposes legal consequences on the abuse of workers' compensation benefits. Vanderheyden will report any concerns of false or fraudulent claims to the workers' compensation insurance carrier for investigation.

Any person who makes or causes to be made any material statement or representation, known to be false or fraudulent, for the purpose of obtaining or denying workers' compensation benefits or payments is guilty of a crime and subject to criminal and civil penalties.

Social Security This is a federal program, which provides for certain income and medical benefits after retirement and certain income payments in the event of a long term disability. It is paid for by a federal payroll tax on both you and the Agency.

Unemployment Coverage Vanderheyden provides unemployment insurance mandated by New York State for its employees. This is a weekly benefit paid for a limited period of time when employees are out of work for reasons qualifying under New York State regulations.

WORK POLICIES

Smoking and Tobacco Free

Under New York State Law, smoking is prohibited at all of Vanderheyden properties, in and near residences and in all of our vehicles. No smoking or tobacco be allowed anywhere on premises at any time. This policy is for the health and safety of all employees and the population we serve. Employees must adhere to all smoking policies in effect at any facility and applicable State laws where they may be visiting or working.

Personal Appearance

The intent of the Personal Appearance policy to provide guidelines to employees for appropriate attire, grooming and hygiene. It is the responsibility of every employee to be dressed and groomed while at work in a fashion appropriate to their positions and responsibilities. It is especially important that all employees use sound judgment relative to their personal appearance so as to serve as positive role models for individuals served.

1. Requirements for All Employees

Identification Badges:

- All employees are required to wear identification badges at all times while on Vanderheyden premises or on the job.

Grooming and Hygiene:

- Heavily scented perfumes, colognes and lotions must be avoided
 - Clothing must be clean, appropriate, and comfortable and provide a non-distracting fit. (sagging pants, revealing tops, torn clothing, inappropriate messages on clothes, pajamas, flip flops are a few examples of unacceptable attire)
 - Fingernails must be kept clean and trimmed
 - Hair, sideburns, mustaches and beards must be neat and well groomed
 - Jewelry, body piercings and make-up should be moderate
 - Tattoos that are perceived as offensive or hostile or diminish the effectiveness of the employee as a role model for the individuals we serve must be covered
- #### 2. Requirements for All Employees in Direct Care and Education Areas in Addition to I. above
- Footwear: all employees while working in direct care and education areas must wear closed toed shoes as protection.

- Vanderheyden shirts are provided and must be worn in all direct care areas with the exception of education.
 - Clothing contaminated with blood, body fluids, or other contaminants should be removed immediately and laundered. Employees are provided shirts at no cost. Additional shirts may be purchased.
3. Requirements for All Employees in Non-Direct Care Areas in Addition to I. above
- Employees in professional staff positions may wear business or casual business clothing. Flip flops, jeans, sweat pants, sweat shirts, pajamas, workout attire, shorts, or tee shirts are examples of unacceptable attire.
 - Employees in grounds keeping, maintenance and other facilities support areas may wear appropriate work clothes and shoes for their jobs. For example, work boots, carharts, jeans, work shoes are acceptable.
 - Theme days as approved are acceptable: i.e. Friday dress down day; wearing sweatshirt to an Agency cleanup or work day, at the discretion of management, etc.

The Agency reserves the right to determine appropriate dress. Employees violating the policy may be asked to leave work to change their clothing. This leave time is unpaid. Departure from appropriate personal appearance may and result in employee counseling.

Fraternization Policy

Social and dating relationships are prohibited between any managerial employee and any of his/her direct or indirect subordinates. In the event that a personal relationship develops, Vanderheyden requires an employee to bring it to the attention of management so that supervision relationships can be changed to remove the likelihood of sexual harassment.

A conflict of interest may exist also in an instance where two family members would be working closely together. This includes manager-employee relationships as well as the interactions of co-workers. In these instances action will generally be taken to assure that favoritism in employee treatment is not fostered in the employment and selection process.

Drug Free Workplace

Vanderheyden has a strong commitment to providing a healthy, safe, and secure environment for all employees and youth so as to enhance the deliveries of services and to promote lasting relationships with the individuals and families we serve. Pursuant to Section 5151-51 60 of the Drug Free Work Place Act of 1988, Vanderheyden has established a policy that subscribes to the Act.

Vanderheyden believes it is our right, responsibility and obligation to provide a safe work environment for our employees, clients and the public. It is also our responsibility to provide a high level of service to our clients. We must also protect the Agency from unnecessary financial loss due to substance abuse by employees.

It is the Agency's desire to provide a drug and alcohol-free, healthy, and safe workplace. To promote this goal, all employees are required to report to work in appropriate mental and physical condition to perform their jobs in a satisfactory manner. Vanderheyden prohibits the use, sale, possession, distribution, dispensation, formulation, manufacture, or transfer of alcohol, illegal or controlled substances.

Disciplinary Action - any employee, who possesses, uses, sells, stores, distributes, or who is found to have alcohol or controlled drugs present in their system when reporting to work, at work, or during working hours will be subject to disciplinary action, up to and including termination of employment.

Notification Requirements - Employees must inform their managers of any therapeutic drugs that have been prescribed by a licensed physician which could in any way affect work performance, driving ability (if driving is a part of the employee's job), operating machinery/equipment and/or endanger other individuals in the workplace. The legal use of prescribed drugs is permitted on the job only if it does not impair an employee's ability to perform the essential functions of the job in an effective and safe manner, and if it does not endanger the employee or other individuals in the workplace. Employees may be required to obtain a medical release or note detailing any limitations or restrictions.

Employees must report any problems that are a result of alcohol or drugs to their manager immediately. This includes an employee's own problems or those that are the result of others.

Performance Reviews

The Agency strives to have managers review performance of their employees annually. This is the opportunity for the employee to give their manager valuable feedback related to the job. Managers will work with employees to define goals and communicate performance expectations.

Progressive Discipline – Corrective Action

Vanderheyden believes in a strength based approach towards employee performance. Managers are encouraged to find and focus on what an employee does right as opposed to focusing on their areas of weakness or poor performance. In some instances, performance deficiencies may be properly addressed through counseling an employee, and specifying required improvement through the performance review process. Other times, progressive corrective action is appropriate. The Agency maintains a progressive discipline policy to ensure fairness in addressing problems with employees. Step one is a documented verbal consultation; Step 2 is a formal warning accompanied by a plan of corrective action for the employee. Step 3 is a second formal warning with up to one week of unpaid suspension. Step 4 is termination of employment. Corrective Action remains in the employees file for 12 months from the infraction.

The Agency reserves the right to advance steps including to terminate employment without following these progressive steps when it is determined that this is in the best interest of the Agency, its reputation, or the individuals it serves. Some examples may include, but not limited to:

- failure to meet job duties and responsibilities as specified through the employee's job description
- breach of Confidentiality, Code of Ethics or Code of Conduct as set forth in Agency policies
- behavior which is inconsistent with Vanderheyden's values and principles
- Insubordination; when an employee refuses to submit to or carry out a legitimate directive
- being off duty during a specified assigned period without the permission of one's manager
- being under the influence of mind altering substances while on duty
- forgery of Agency records, theft, violence, fraud, giving false information
- gross misconduct, knowingly falsifying documents or information
- threatening the health and safety of those we serve or fellow employees
- committing criminal acts outside of the workplace
- sexual harassment

Separation from Employment

Any instance in which an employee ends his/her employment relationship with the Agency is defined as "separation of employment". The four general categories of separation of employment apply to all employees except those covered by a bargaining agreement.

1. Voluntary resignation - Directors and any non-union employees who work directly with our individuals served are requested to provide as much notice as possible prior to leaving the Agency but, in no event, not less than 3 weeks' notice in writing. All other employees are also requested to provide as much notice as possible prior to leaving the Agency but, in no event, not less than 2 weeks written notice. Unused Vacation Leave is only paid out to individuals that have adhered to the notice periods described above.

Please see the policy and procedure manuals for more information on the proper separation procedures.

2. Retirement - This pertains to employees who are eligible to retire and receive benefits under the Agency's retirement program. In these cases, employees are expected to give as much notice as possible, with a minimum of three weeks' notice of the intention to retire.

3. Layoff - This pertains to situations in which a position in the Agency has been eliminated or the overall size of the work force is reduced. The Agency will provide a minimum of one (1) weeks' notice to employees affected by a layoff. All accrued Vacation Leave is paid out upon layoff. Layoff individuals are eligible for re-employment based upon their qualifications and work performance as well as the job requirements for position vacancies, which become available.

4. Involuntary Discharge - This occurs when an employee's conduct or behavior represents a significant detriment to the Agency. Unused Vacation Leave is not paid and forfeited.

If an employee is rehired by Vanderheyden within a year of leaving, benefits eligibility will revert to the level at the time of the employees leaving.

Exit Interview

Vanderheyden has a considerable investment in its employees. Therefore, it is of interest to the organization to evaluate the circumstances surrounding the separation of a staff member, whether voluntary or involuntary. Exploring an employee's reasons for resigning, or the factors resulting in termination, enables the Agency to better evaluate whether the work environment is conducive to staff satisfaction or whether changes can or should be made.

Employees leaving Vanderheyden for any reason will be requested to participate in an exit interview, conducted by the Agency's Human Resource Office.

Final Pay

Vanderheyden recognizes that there are occasions when the Agency or employee decides to end their working relationship. When this occurs the employee will receive all pay which may be due them. Final paychecks are live and paystubs will be mailed to the address on file unless other provisions are made with the payroll office.

Releasing Job References

All requests for information about a current, retired or terminated employee must be transferred to the Human Resource Office, who may disclose to prospective employers only the former employee's dates of employment, final title or position, and job location. This policy includes all recommendations and referral requests made on social media sites. With the former employee's permission, the Human Resource Office may give an employment and salary history.

Information requested by a law enforcement Agency may be provided if it is believed that an applicant, employee or former employee has been engaged in illegal activities if actions of the individual threaten physical injury to Agency property, other employees or persons served, and/or protect the legal interests of the Agency. In such cases, any release of information will be made only if approved by the President and Chief Executive Officer.

PROPERTY AND PREMISES

Use of Agency Property

Vanderheyden directly provides a large array of equipment which assists employees in conducting their job responsibilities. Employees will not directly or indirectly use or allow the use of the property, equipment or supplies belonging to Vanderheyden, other than when conducting job responsibilities. All agency equipment must remain on premises at all times.

Keys

All employees of Vanderheyden are issued keys which allow them to conduct their specific job functions. Keys are the property of the Agency. All efforts are made to ensure that the keys issued permit the employee to conduct their specific job functions in the most efficient manner while also providing for the security of job sites.

Visitors

All visitors must be directed to the Administration Building to record their visit and arrange to be escorted by an employee. No visitors will be allowed in the school, residences, other buildings, in storage areas, in Agency vehicles or other areas deemed inappropriate by Management. All visitors must abide by all Agency procedures.

Theft

Please report the theft of Agency property to a manager and Corporate Compliance immediately. The proper law enforcement agency will be contacted. Employees should take precautions to prevent theft by following all security procedures and securing valuables.

Vanderheyden is not responsible for the loss, theft or damage of an employee's belongings from our premises or vehicles. Employees should leave their valuables at home.

Vehicles

Vanderheyden provides Agency vehicles for the use of employees in carrying out their job responsibilities. Vehicles that are provided by the Agency have specific guidelines for usage which ensure that vehicles are in the best operating order and are kept in a secure fashion when not in use.

Any employee, who operates an Agency vehicle, on campus or off campus, shall have a valid New York State driver's license, be age 21 or older, and have maintained their driver's license for the past three years, have no more than three moving violations in a three (3) year period and have successfully completed the Agency vehicle driving training and refreshers as required.

Drivers using their own vehicle for Agency business must have a valid NYS driver's license, be age 21 or older and carry adequate automobile insurance.

Vanderheyden vehicles may only transport passengers who are people we serve for whom "permission to transport" is given by Management or who are employees, volunteers or interns which have a business purpose for being in the vehicle.

Drivers must obey all traffic laws, observe speed limits and remember to wear seat belts at all times. Drivers are reminded of laws regarding "hands free" use of cell phones. Text messaging while driving is prohibited.

Driving Incidents and Accidents

As part of our ongoing commitment to Safety, any accidents involving a Vanderheyden vehicle must be immediately reported to your manager. A police report must be filed at the time of the accident and an Agency Incident Report completed and sent to Human Resources within 24 hours. Traffic tickets, infractions or accidents that are incurred while on work time must be reported to your manager and Human Resources immediately. Moving violations issued are the responsibility of the driver. Two incidents within a rolling 24 month period may result in disciplinary action up to and including termination of employment.

Parking Policy

Staff parking on the main campus is allowed in designated parking areas. Vehicles may unload but not park anywhere in the circle. Employees and Visitors driving on Agency property or who utilize parking at Vanderheyden do so at their own risk. The Agency is not responsible for any parking violations incurred by employees whether on or off duty.

COMMUNICATIONS AND TECHNOLOGY

Telephone/Cell/ Smartphones

Personal telephone calls/text messages made or received, on Agency or personal telephones, cell phones, smartphones and any latest technology, while at work, should be limited to those which are absolutely necessary. Excessive personal calls/text messages may not occur during working hours.

All employees, including per diem employees are asked to be considerate of business needs and schedule their personal calls/text messages for non-working times, such as before and after work or during the meal break period.

Everyone must observe business courtesy when answering telephone calls. The ways in which our telephones are answered reflects the professional image of Vanderheyden. An employee is expected to answer a ringing telephone regardless of their specific job responsibility. No call should go unanswered. If the call is for someone else, take a message and relay it promptly and accurately, or put it through to voice mail.

Discretion must be used in making or receiving personal calls/text messages on cellular telephones during working hours. Excessive personal calls/text messages during the work day, whether by Agency phone or personal cellular phone, can interfere with productivity and create a distraction for others. Calls should be limited to non-work time whenever possible. When it is necessary to make the calls during business hours, keep them as brief as possible. Any long distance calls made from the agency may be charged to you.

It is the Agency's policy to prohibit the use of the camera feature on all cell phones for private pleasure, while being paid by Vanderheyden. Employees violating this policy will be subject to discipline up to and including discharge and possible legal ramifications.

Texting

Texting that contains any information about clients, agency activities, management and agency employees, transmitted by, received from, or stored in that system may be retrieved by the Agency. Texting while driving on Agency time is strictly prohibited.

The Agency's policy prohibiting harassment, in its entirety, applies to texting and social media. No one may text or communicate in a manner that may be construed by others as harassment or offensive based on race, color, religion, gender, age, national origin, disability, marital or domestic violence victim status, sexual orientation, genetic predisposition or carrier status, veteran status or any other protected characteristic as established by federal and state law.

The Confidentiality policy and Regulatory policies apply to texts and social media. Employees should have no expectation of privacy in connection with the use texting with the transmission, receipt, or storage of Agency information.

Receipt of Adverse Communication

The President and Chief Executive Officer must be notified of the receipt of any negative information addressed to any Agency employee immediately upon its receipt. The President and Chief Executive Officer and the Board of Directors will determine necessary action.

Licensed Software

Employees are expected to follow all licensing provisions and copyright laws. Management is involved in maintaining employee compliance related to licensing software. Specific questions about our computer system may be directed to the IT Director.

Software purchased by and licensed to the Agency cannot be copied or downloaded to any other computer. We allow only approved licensed software on any computer in the office or connected to the network. Employees cannot copy to or load software from user groups, electronic bulletin boards, friends or any other source on any network computer, unless permission is received for a business purpose from the ITM Department.

The computer user is responsible for the accuracy, security and back up of any data or files reused. Passwords are private and cannot be shared or revealed to anyone. The IT Manager must have a list of employee passwords for use in an emergency or after an employee leaves.

Employees may not use Vanderheyden computer systems to support or promote any activity for personal gain or any unauthorized private business, religious or political activity. Employees also may not use the Agency computer system in a manner which prevents or disrupts the ability of other employees to use the services or equipment of the system.

Employees are required to maintain and manage their files on the Agency system, including deleting obsolete or redundant versions of files on a regular basis from personal and shared directories.

Any deliberate attempt to penetrate the security system results in the loss of access privileges and can result in disciplinary procedures.

All information processed and transferred through any Agency computer is the property of the Agency. Information processed or transferred is not personal or private. Employees should be aware that periodic monitoring can occur.

Employees should have no expectation that any privacy exists in connection with the use of the Agency's systems or with the transmission, receipt, or storage of information on these systems. Employees are also responsible for following all copyright regulations and are personally liable for any consequences of failure to comply.

E-Mail/Voicemail/Electronic Communication Policy

We recognize your need to be able to communicate efficiently with fellow employees and the individuals we serve. Therefore, we have an internal electronic mail (e-mail) system or latest communication technology to facilitate the transmittal of business-related information within the Agency and with our clients.

The e-mail system is intended for business use only. The use of the Agency's e-mail system to solicit fellow employees or distribute non job-related information to fellow employees is for Agency activities only.

The use of the "All Agency" email group should be made on a limited basis and consult your manager for guidance prior to using this email group email.

Our Agency's policies against sexual and other types of harassment apply fully to the e-mail system. Violations of those policies are not permitted and may result in disciplinary action, up to and including discharge. Therefore, employees are also prohibited from the display or transmission of sexually-explicit images, messages, ethnic slurs, racial epithets or anything that could be construed as harassment or disparaging to others.

Employees shall not use unauthorized codes or passwords to gain access to others' files. Employees are prohibited from developing private or encryption programs. All e-mail passwords must be made available to the Agency at all times. Please notify your manager if you need to change your password.

For business purposes, management reserves the right to enter, search and/or monitor the Agency's private e-mail system and the files/transmission of any employee without advance notice and consistent with applicable state and federal laws. Employees should expect that communications that they send and receive by the Agency's private e-mail system will be disclosed to management.

Employees should not assume that communications that they send and receive by the Agency's private e-mail system are personal or private. Employees should be aware that even deleted email and voice mail are recoverable.

Employees do not have the right to read, recover transmissions or communicate through email or other electronic communication after employment separation. Employees should remember that

email can be forwarded without the knowledge or permission of the sender. Important documents must be treated securely. Email can become corrupted in transmission and should not be relied upon as the only means of transmission.

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

Acceptable Use of Electronic Communications

This policy contains guidelines for Electronic Communications created, sent, received, used, transmitted, or stored using Agency communication systems, the latest technology or equipment and employee provided systems or equipment used either in the workplace, during working time or to accomplish work tasks.

“Electronic Communications” include, among other things, messages, images, data or any other information used in e-mail, instant messages, voice mail, fax machines, computers, personal digital assistants (including Blackberry or similar text messaging devices), pagers, telephones, cellular and mobile phones including those with cameras, Intranet, Internet, back-up storage, information on a memory or flash key or card, jump or zip drive or any other type of internal or external removable storage drives.

In the remainder of this policy, all of these communication devices are collectively referred to as “Systems.”

Employees may use our Systems to communicate internally with co-workers or externally with agencies, suppliers, vendors, advisors, and other business acquaintances for business purposes.

All Electronic Communications contained in Agency Systems are Agency records and/or property. Although an employee may have an individual password to access our Systems, the Systems and Electronic Communications belong to the Agency. The Systems and Electronic Communications are accessible to the Agency at all times including periodic unannounced inspections. Our Systems and Electronic Communications are subject to use, access, monitoring, review, recording and disclosure without further notice. Our Systems and Electronic Communications are not personal or private. The Agency's right to use, access, monitor, record and disclose Electronic Communications without further notice applies equally to employee-provided systems or equipment used in the workplace, during working time, or to accomplish work tasks.

Although incidental and occasional personal use of our Systems that does not interfere or conflict with productivity or the Agency's business or violate policy is permitted, personal communications in our Systems are treated the same as all other Electronic Communications and will be used, accessed, recorded, monitored, and disclosed by the Agency at any time without further notice.

Since all Electronic Communications and Systems can be accessed without advance notice, employees should not use our Systems for communication or information that employees would not want revealed to third parties. Employees may not use our systems in a manner that violates our policies including but not limited to Non-Harassment, Sexual Harassment, Equal Employment Opportunity, Confidentiality of Patient Matters, Protecting Agency Information, E-Mail Monitoring, and Internet

Usage. Employees may not use our systems in any way that may be seen as insulting, disruptive, obscene, offensive, or harmful to morale. The Agency's policy prohibiting harassment, in its entirety, applies to the use of our electronic communications systems.

No one may use electronic communications in a manner that may be construed by others as harassment or offensive based on race, color, religion, gender, age, national origin, disability, marital or domestic violence victim status, sexual orientation, genetic predisposition or carrier status, veteran status or any other protected characteristic as established by federal and state law.

Examples of prohibited uses include, but are not limited to, sexually explicit drawings, messages, images, cartoons, or jokes; propositions or love letters; ethnic or racial slurs, threats, or derogatory comments; or any other message or image that may be in violation of Agency policies.

In addition, employees may **not** use our Systems:

- To download, save, send or access any defamatory, discriminatory or obscene material;
- To download, save, send or access any music, audio or video file;
- To download anything from the internet (including shareware or free software) without the advance written permission of the IT Manager;
- To download, save, send or access any site or content that the Agency might deem "adult entertainment;"
- To access any "blog" or otherwise post a personal opinion on the intranet;
- To solicit employees or others;
- To attempt or to gain unauthorized or unlawful access to computers, equipment, networks, or systems of the Agency or any other person or entity;
- In connection with any infringement of intellectual property rights, including but not limited to copyrights;
- In connection with the violation or attempted violation of any law.

An employee may not misrepresent, disguise, or conceal his or her identity or another's identity in any way while using Electronic Communications; make changes to Electronic Communications without clearly indicating such changes; or use another person's account, mail box, password, etc. without prior written approval of the account owner and without identifying the actual author.

Employees must always respect intellectual property rights such as copyrights and trademarks. Employees must not copy, use, or transfer proprietary materials of the Agency or others without appropriate authorization.

All Systems passwords and encryption keys must be available and known to the Agency. Employees may not install password or encryption programs without the written permission of your manager. Employees may not use the passwords and encryption keys belonging to others.

Numerous state and federal laws apply to Electronic Communications. The Agency will comply with applicable laws. Employees also must comply with applicable laws and should recognize that an employee could be personally liable and/or subject to fine and imprisonment for violation of applicable laws.

Violations of this policy may result in disciplinary action up to and including discharge as well as possible civil liabilities or criminal prosecution. Where appropriate, the Agency may advise legal officials or appropriate third parties of policy violations and cooperate with official investigations. We will not, of course, retaliate against anyone who reports possible policy violations or assists with investigations.

If you have questions about the acceptable use of our Systems or the content of Electronic Communications, ask your manager for clarification.

Social Networking

The Agency encourages employees to share information with co-workers and with those outside the Agency for the purposes of gathering information, generating new ideas, and learning from the work of others. Social media provide inexpensive, informal, and timely ways to participate in an exchange of ideas and information. However, information posted on a website is available to the public and, therefore, the Agency has established the following guidelines for employee participation in social media.

Note: As used in this policy, “social media” refers to blogs, forums, and social networking sites, such as Twitter, Facebook, LinkedIn, YouTube, and Myspace, among others.

Off-duty use of social media. Employees may maintain personal websites or web logs on their own time using their own facilities. Employees must ensure that social media activity does not interfere with their work. In general, the Agency considers social media activities to be personal endeavors, and employees may use them to express their thoughts or promote their ideas as long as they do not conflict with Agency policies or business.

On-duty use of social media. Employees may engage in social media activity during work time provided it is directly related to their work, approved by their manager, and does not identify or reference Agency individuals we serve or vendors without express permission. The Agency monitors employee use of Agency computers and the Internet, including employee blogging and social networking activity.

Respect. Demonstrate respect for the dignity of the Agency, its owners, the individuals we serve, its vendors, and its employees. A social media site is a public place, and employees should avoid inappropriate comments. For example, do not use ethnic slurs, personal insults, or obscenity, or use

language that may be considered inflammatory. Even if a message is posted anonymously, it may be possible to trace it back to the sender.

Post disclaimers. If an employee identifies himself or herself as an Agency employee or discusses matters related to the Agency on a social media site, the site must include a disclaimer on the front page stating that it does not express the views of the Agency and that the employee is expressing only his or her personal views.

For example: “The views expressed on this website/Web log are mine alone and do not necessarily reflect the views of my employer.” Place the disclaimer in a prominent position and repeat it for each posting expressing an opinion related to the Agency or the Agency’s business. Employees must keep in mind that if they post information on a social media site that is in violation of Agency policy and/or federal, state, or local law, the disclaimer will not shield them from disciplinary action.

Competition. Employees should not use a social media to criticize the Agency’s competition and should not use it to compete with the Agency.

Confidentiality. Do not identify or reference Agency business, other staff, the individuals we serve, or vendors without express permission. Employees may write about their jobs in general but may not disclose any confidential or proprietary information. For examples of confidential information, please refer to the confidentiality policy. When in doubt, ask before publishing.

New ideas. Please remember that new ideas related to work or the Agency’s business belongs to the Agency. Do not post them on a social media site without the Agency’s permission.

Trademarks and copyrights. Do not use the Agency’s or others’ trademarks on a social media site, or reproduce the Agency’s or others’ material without first obtaining permission.

Legal. Employees are expected to comply with all applicable laws, including but not limited to, Federal Trade Commission (FTC) guidelines, copyright, trademark, and harassment laws.

Agency restrictions. The Agency may require that employees temporarily confine social media commentary to topics unrelated to the Agency or those employees temporarily suspend such activity in violation of regulations or other laws.

The Agency may also require employees to delete references to it on a website or Web log, and under certain circumstances, to stop identifying themselves as an employee of the Agency.

Avoid statements about the Agency’s future. Writing about projected growth, funding and profits, future services, marketing plans, or fees violate policy or other applicable laws.

Discipline. Violations of this policy may result in discipline up to and including immediate termination of employment.

Note: Nothing in this policy is meant to, nor should it be interpreted to, in any way limit your rights under any applicable federal, state, or local laws, including your rights under the

National Labor Relations Act to engage in protected concerted activities with other employees to improve terms and conditions of employment, such as wages and benefits.

Internet Use

As a growing Agency, we recognize the need to stay on the cutting edge of technology. This is one of the reasons we allow employees to have access to the Internet. The Internet is intended for business use only. Use of the Internet for any non-business purpose, including but not limited to, personal communication or solicitation, purchasing personal goods or services, gambling and downloading files for personal use, is strictly prohibited. Employees may not use Agency internet connection for accessing streaming-data type applications such as non-business related video, audio sites or other media (i.e. entertainment downloads), including continuous music. These applications use a high amount of Internet bandwidth, and therefore, will slow access time of legitimate Internet business activity.

Our Agency's policies against sexual and other types of harassment apply fully to Internet usage, including the use of instant messaging programs. Violations of those policies are not permitted and may result in disciplinary action, up to and including discharge. Therefore, employees are also prohibited from displaying, transmitting and/or downloading sexually explicit images, messages, ethnic slurs, racial epithets or anything that could be construed as harassment or disparaging to others.

Consistent with applicable federal and state law, the time you spend on the Internet may be tracked through activity logs for business purposes. All abnormal usage will be investigated thoroughly. Employees learning of any misuse of the Internet shall notify a member of management. Violation of this policy may result in disciplinary action up to and including discharge.

Removal of Information

Employees are prohibited from removing electronic files, documents, products or other information of any kind, in any form, from Vanderheyden premises unless permission has been obtained from your manager or Corporate Compliance. Information resulting from the development of products and services or lost sales, remains the property of the Agency and cannot be removed in any format. Employees cannot copy or remove any computer programs or other Agency owned or licensed media from Agency computers. Agency-owned software installed on personal computers owned by employees, is also subject to this policy. This policy includes all electronic files held on Agency or personal computers. (Also see Retention and Disposal Policy)

SAFETY POLICIES

Vanderheyden asks each employee to help us in our responsibility of carrying out the safe operation of the Agency.

Our goal at Vanderheyden is to work safely. We follow guidelines as outlined in the Federal Occupational Safety and Health Act (OSHA) and Operations and Policy Manual. Planning for safety is incorporated into all phases of our work. The Agency develops and reinforces proper health and safety procedures as needs arise.

Reporting Work Related Injuries

Employees must immediately report any work-related injury, no matter how minor, to the Human Resources department. The employee must complete and sign an Employee Incident Report Form as soon as possible after receiving any necessary medical care.

Blood borne Pathogens

Vanderheyden is committed to provide a safe and healthful work environment for our entire staff. In pursuit of this endeavor, the Agency has an Exposure Control Plan (ECP) which is provided to eliminate or minimize occupational exposure to blood borne pathogens in accordance with OSHA Blood borne Pathogens Standards, Title 29 Code Of federal regulations.

The ECP is a key document to assist our Agency in implementing and ensuring compliance with the standard, thereby protecting our employees. This ECP includes:

- Employee exposure determination
- Methods of implementation and control

Employee Guidelines

Employees must follow all safety policies when working in the premises. Reasonable precautions and consistent safe work habits prevent accidents. We have established procedures and standards for all employees to follow. Basic safety guidelines include, but are not limited to:

- An injured or ill employee should report immediately to the Manager and Human Resources. Any incident or hazard must be reported to their Manager or the Safety Officer immediately as well. Failure to report an accident or illness may result in disciplinary action.
- Call an ambulance when a serious medical emergency has occurred.
- Before using any equipment, employees must have read the instructions and received proper training.

- Employees should detect hazardous conditions, or behaviors and report concerns to the Safety Officer or Human Resources. Employees should feel free to bring recommendations for safety procedures to Management.
- Practice "Safety Awareness" - most accidents are caused by the carelessness of one person.

Safety Rules

Safety is everybody's business. Safety is to be given primary importance in every aspect of planning and performing all Agency activities. We want to protect you against industrial injury and illness, as well as minimize the potential loss of productivity.

Please report all injuries (no matter how slight) to your manager immediately, as well as anything that needs repair or is a safety hazard. Below are some general safety rules. Your manager or department head may post other safety procedures in your department or work area:

- Stay current on all job related and compliance trainings. For example SCIP, and TCI.
- Wear appropriate footwear, for example, flat shoes to reduce risk of slips, trips and falls.
- Avoid overloading electrical outlets with too many appliances or machines.
- Use flammable items, such as cleaning fluids, with caution.
- Report to your manager if you or a co-worker becomes ill or is injured.
- Ask for assistance when lifting heavy objects or moving heavy furniture.
- Keep cabinet doors and file and desk drawers closed when not in use.
- Start work on any machine only after safety procedures and requirements have been explained (and you understand them).
- Keep your work area clean, orderly, and the aisles clear.
- Stack materials only to safe heights.
- Watch out for the safety of fellow employees.
- Use the right tool for the job, and use it correctly.

Please note that it is your responsibility to be aware of and adhere to safety rules at all agency sites. Also, remember, failure to adhere to these rules will be considered serious infractions of safety rules and will result in disciplinary actions.

First Aid Kits/Fire Emergencies/Fire Extinguishers/Spill Kits

First Aid Kits, Spill Kits and fire extinguishers are located in designated areas. Report all medical and fire emergencies to 911 and the Safety Officer.

Employees should follow all building procedures. All employees must evacuate the building at the sound of the alarm and stay outside until given authorization to return to work. Employees should gather in the Agency parking lot for a head count.

OSHA Guidelines

The goal of Federal Occupational Safety and Health Act (OSHA) is to provide a safe work environment. Every employee must follow appropriate OSHA guidelines as communicated by the Agency. Human Resources have the OSHA Employee's Right to Know and the MSDS notebook (Material Safety Data Sheets) available for employee review.

Receipt for this Employee Handbook

I acknowledge that I have received a copy of Vanderheyden Hall, Inc.'s Employee Handbook. As an employee of Vanderheyden Hall, Inc., I am required to abide by the employee handbook. I agree to read it thoroughly, including the statements in the foreword describing the purpose and effect of the Handbook. I agree that if there is any policy or provision in the Handbook that I do not understand, I will seek clarification from management.

I consent to viewing the Employee Handbook on an Agency via a secure internet connection or to receive a copy via email from Human Resources. I understand I can access this information at any time from a computer with an internet connection. I can withdraw this consent at any time by notifying the Human Resources in writing or via email. I have a right to request and obtain a paper version of the Employee Handbook from Human Resources at any time.

I understand that my obligation to maintain confidential matters extends beyond my employment with Vanderheyden Hall, Inc. I understand that Vanderheyden Hall, Inc. is an "at will" employer and as such, employment with the Agency is not for a fixed term or definite period and may be terminated at the will of either party, with or without cause, and without prior notice. No manager or other representative of Vanderheyden Hall, Inc. (except the President and Chief Executive Officer) has the authority to enter into any agreement for employment for any specified period of time, or to make any agreement contrary to the above.

In addition, I understand that this Handbook states the Agency's policies and practices are in effect on the date of publication. I understand that nothing contained in the Handbook may be construed as creating a promise of future benefits or a binding contract with Vanderheyden Hall, Inc. for benefits or for any other purpose. I also understand that these policies and procedures are continually evaluated and may be amended, modified or terminated at any time.

The Operations and Policy Manual which covers the operation of the Handbook and is located online on the V.E.I.N. (Vanderheyden Employee Information Network) and in each Agency unit for the employees review.

Please sign and date this receipt and return it to the Human Resources.

Signature: _____

Date: _____

Print Name: _____

APPENDIX A