PERSONNEL POLICIES AND PROCEDURES

March 9, 2021
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SECTION 1
GENERAL INFORMATION, TERMS, AND CONDITIONS

Corporate Philosophy

1.1 Mission Statement: We create partnerships and opportunities to help individuals, families and communities thrive.

1.2 Vision Statement: To make hope, ability, and opportunity possible for all whom we serve.

Organization Chart

1.3 A copy of the GLCAP organizational chart is provided at Employee Orientation. For an updated copy, contact Human Resources.

Description of Each Department (rev. 05/10/11)

1.4 The Great Lakes Community Action Partnership brochure includes the service area and description of the services provided by each department. Each department is an important part of fulfilling our mission and achieving our vision. Employees are expected to know the functions and services of their own department, and are encouraged to become familiar with other departments to gain a fuller understanding of how each contributes to the whole. For an updated copy, contact Human Resources.

Introduction (rev. 03/09/21)

1.5 Affirmation of Non-Discrimination: GLCAP makes all employment decisions in a non-discriminatory manner. Employment decisions are based on merit and business needs, without regard to race, color, citizenship status, national origin, ancestry, gender, sexual orientation (including sexual harassment), age (40 years old or more), religion, creed, physical or mental disability, marital status, veteran status, political affiliation, military status, economic status, ethnicity, culture, family composition, employee and family genetic information or any other factor protected by law. This applies to all terms and conditions of employment, including but not limited to hiring, placement, promotion, termination, layoff, recall, transfer, leaves of absence, compensation, benefits, etc.

1.6 Employment-at-Will: GLCAP is an “employment-at-will” employer which means that, in the absence of a written employment agreement or collective bargaining agreement, GLCAP has the right to terminate the employment relationship at any time, for any reason, or for no reason at all, and may transfer, demote, or change the terms and conditions of employment at any time for any reason, with or without cause and with or without notice. Likewise, employees may terminate the employment relationship at any time, with or without cause or prior notice.

Furthermore, in accordance with the at-will principle, nothing contained in the GLCAP policies, procedures or practices is intended to create either an expressed or an implied contractual relationship, and nothing contained in this handbook or in the day-to-day administration of Human Resources practices, including but not limited to performance appraisals, pay increases or disciplinary measures are intended to alter or modify the employment-at-will relationship between GLCAP and its non-bargaining unit employees.
1.6 **Employment-at-Will (continued):** Only the President/CEO or Board of Directors has the authority to alter the at-will nature of the employment relationship, and any such alteration must be specifically designated in writing, signed by the President/CEO or the Board Chairperson if the alteration concerns the President/CEO. No supervisor, manager, or other GLCAP personnel has the authority to bind GLCAP to an employment contract for a specified duration, promise any benefit or term of employment, or require cause or notice for termination of employment.

1.7 **Employee and Management Responsibilities:** It is the employee’s responsibility to know, understand, and follow these policies and procedures throughout the entire course of employment. Likewise, management assumes these same responsibilities, but also has the responsibility to monitor and enforce them in accordance with, but not exceeding, their delegated authority as specified by job requirements in the manager’s position description. Notwithstanding delegated management authority, in the event that discipline is contemplated or warranted, Human Resources may participate in disciplinary investigations and meetings. In order to encourage uniform application of the policies, a Human Resource representative will provide guidance to management and employees regarding consistent interpretation of policies and procedures. Employees or managers who have questions regarding the interpretation and application of these policies should confer with their immediate supervisor or with Human Resources before making a decision or taking any action.

Violation of any policy or procedure can result in disciplinary action, up to and including discharge. The determination that there is cause for discipline, or the decision to impose some form of disciplinary action in lieu of an at-will discharge, shall in no manner erode, or be construed to erode the employment-at-will relationship between GLCAP and its employees.

1.8 **Policy Review and Understanding:** New employees are required to review and understand this manual’s contents, and each will be given the opportunity to ask questions and solicit additional information pertaining to the policies and procedures contained therein. As a condition of employment, each new employee is required to sign a *Policy Review and Understanding* form that substantiates the employee's understanding of, and agreement to abide by these policies and procedures. Likewise, effective on the date of adoption of this manual, each current employee will be required to review and understand this manual, and will be required to electronically sign a *Policy Review and Understanding* form through Kronos.

Signing of the *Policy Review and Understanding* form does not constitute a contract of employment, nor shall it be construed or interpreted as evidence of a contractual relationship between the employee and GLCAP. The signed *Policy Review and Understanding* form shall be retained in the employee's personnel file.

1.9 **Authority to Establish Policy and Procedure:** This manual contains personnel policy guidelines and expectations regarding the terms, conditions, and benefits of employment with GLCAP.

Policies are established by the Board of Directors, with approval of Head Start Policy Council/Committee. However, as authorized by the Board of Directors on January 2, 1996, the President/CEO has the authority to implement any new or revised policies and procedures subsequent to new laws, regulatory agency regulations, and/or funding source regulations. These changes will be taken to Head Start Policy Council/Committee and the Board of Directors for subsequent approval.

The President/CEO is authorized to adopt procedures that provide guidance for management and employees in interpreting and applying the policies adopted by the Board of Directors. Procedures may be changed and applied as needed to best meet the needs of GLCAP, in so far as the procedures remain consistent with the letter and spirit of these policies.
1.10 **Policy Changes:** Policies established in this manual are not promises and are subject to change with or without notice, at the sole and absolute discretion of GLCAP. GLCAP strives to update these policies as conditions evolve and change. When a policy changes, the new or revised policy will be brought to the attention of all employees through policy change memos initiated by email with instructions on how to review the policy through Kronos. Each employee is expected to review and understand the change, and shall acknowledge receipt and understanding by electronically signing the new policy or policy change through Kronos.

The official electronic version of the manual shall be retained by Human Resources. An electronic version of the manual is available by accessing the Employee Information link in Kronos.

1.11 **Severability:** In the event that there is a conflict between the matters expressed in this manual and any applicable law, requirement, or legal decision, the applicable law, decision or requirement shall prevail. The remainder of the policy, and of other policies specified in this manual, not affected by the law, requirement or decision, shall remain in full force and effect.

This handbook is the property of GLCAP and must be returned when employment with GLCAP is terminated, or as otherwise directed by the Human Resource Department or the employee’s Director.

**Definitions**

(Rev. 03/08/16)

As used in this manual, the following definitions shall apply.

1.12 **GLCAP:** When used refers to Great Lakes Community Action Partnership.

1.13 **Board of Directors:** The Board of Directors of Great Lakes Community Action Partnership.

1.14 **Employee:** An individual hired by GLCAP to perform services on behalf of, and under the supervisory control of GLCAP in exchange for an hourly wage or salary. An employee’s salary or wage is subject to all applicable federal, state and local taxes. Employees are employed at will by GLCAP.

1.15 **Management/Manager:** a general term used to describe supervisors, directors and all other persons charged with the responsibility of directly managing any employee of GLCAP. Management employees have authority for making or recommending personnel decisions in accordance with their authority as defined in their position descriptions.

1.16 **He/Him:** References to the male [or female] gender used throughout these policies and procedures (e.g., his, him, he, she, her) shall mean both the male and female gender, and are not intended, nor shall they be construed, to be discriminatory in any manner.

1.17 **Hiring Supervisor:** A management level employee, with hiring authority, who is charged with making the selection decision or for collaborating with other hiring supervisors, for filling a position vacancy.

1.18 **Sensitive Information:** Information shared with an employee that must not be disclosed to others except on a business need-to-know basis. Such information may include a participant’s family issues/problems, staffing or reduction in force plans, or any other information shared that has been indicated to be “sensitive.”

1.19 **Kronos:** An electronic information system used by employees, human resources, and payroll for recordkeeping, timesheets, benefits enrollments, payroll processing, recruitment, etc.

1.20 **Personally Identifiable Information (PII):** Information about a person that contains some unique identifier, including but not limited to name or Social Security Number, from which the identity of the person can be determined.
SECTION 2
EMPLOYMENT STATUS & DEFINITIONS

2.1 Employment Status

Policy: GLCAP classifies employees and defines status categories and responsibilities of employment according to the Fair Labor Standards Act (FLSA). GLCAP expects all persons associated with GLCAP, regardless of relationship, to respect and follow the policies and procedures outlined in the manual. All appointments to positions shall be made in accordance with the following guidelines, and each employee shall be assigned to one of the following status’ of employment upon initial employment. An employee’s status of employment may be changed at the discretion of GLCAP during an employee’s course of employment, in consideration of business or budgetary needs, or for any other reason determined appropriate by GLCAP. Changes to employment status may be made with or without prior notice.

Procedure: The status of each position shall be assessed and designated by Human Resources in accordance with this policy prior to the position being filled. Human Resources will confer with the Director and President/CEO when making the designation, which shall be made with consideration to staffing requirements, departmental workload needs, budgetary constraints, availability of current staff to perform responsibilities, and other business factors.

Directors may request a change in status of a position, which shall be submitted through Human Resources, and approved by the President/CEO.

Supervisors, with assistance from Human Resources shall, inform newly hired employees by letter or electronic communication of their appointment and FLSA exemption status in a conditional letter of appointment and again during new hire orientation. In the event that an employee’s status changes during the course of employment, Human Resources will inform the employee in writing.

All designations of independent contractor shall be made only after Human Resources reviews the appointment against the IRS and DOL tests and approves the appointment as an independent contractor. When application of the tests confirm designation as an independent contractor, Human Resources shall notify Accounting and the independent contractor shall be solely and independently responsible for complying with applicable laws, including but not limited to State and Federal required withholdings.

Employment Status Definitions:

Regular Employee: Employees assigned to year-round and seasonal positions [see below]. A regular employee does not include on-call or temporary positions.

- **Regular Year-Round Employee**: Positions in which employees are scheduled to work 12 months during a calendar year.
- **Regular Seasonal Employee**: Positions in which employees are scheduled to work less than 12 months during a calendar year.

Regular Full-Time Employee: A regular full-time employee who is scheduled to work 40 hours a week. Regular full-time employees are eligible to receive voluntary benefits offered by GLCAP including Health, Life and Long Term Disability Insurance, Vacation Leave [for year-round employees only], Personal/Sick Leave, Holidays, 403(b) Tax Sheltered Annuity Plan, and 125 Flexible Benefit Plan. In addition, regular full-time employees are eligible for participation in statutorily required benefits including worker’s compensation, unemployment compensation, and social security.
**Employment Status Definitions (continued):**

**Regular Part-Time Employee:** A regular part-time employee who is scheduled to work less than 40 hours a week. In addition, regular part-time employees are eligible for participation in statutorily required benefits including worker’s compensation, unemployment compensation, and social security.

- **Part-time employees scheduled to work 1-19 hours a week:** are eligible for voluntary benefits offered by GLCAP including but limited to the 403(b) Tax Sheltered Annuity Plan. Voluntary life insurance is available for employees scheduled to work a minimum of 17 ½ hours a week.

- **Part-time employees scheduled to work 20-29 hours a week:** are eligible for voluntary benefits offered by GLCAP including but limited to Vacation Leave [for Regular Year-Round employees only], Personal/Sick Leave, Holidays, 403(b) Tax Sheltered Annuity Plan, and life insurance.

- **Part-time employees scheduled to work 30-39 hours a week:** are eligible for voluntary benefits offered by GLCAP including but limited to Health and Life Insurance, Vacation Leave [for Regular year round employees only], Personal/Sick Leave, Holidays, 403(b) Tax Sheltered Annuity Plan, and 125 Flexible Benefits Plan.

**On-Call Employee:** Positions in which employees do not have set scheduled work hours and who are called in to work on an as needed basis only. On-Call employees are eligible for voluntary benefits offered by GLCAP including but limited to the 403(b) Tax Sheltered Annuity Plan employee elective deferrals only and are eligible for participating in statutorily required benefits including worker’s compensation, unemployment compensation, and social security.

**Acting Employee:** Positions in which a Regular Employee works a limited duration with a set number of hours in a position due to a temporary or permanent vacancy (i.e., filling in for illness, vacations, and other extended absences; vacancies due to a separation from employment, during the hiring process, and for other reasons determined necessary by GLCAP). Acting employees maintain their current benefits.

**Temporary Employee:** Positions in which employees work a limited duration with a set number of hours (i.e., filling in for illness, vacations and other extended absences; vacancies due to a separation from employment) and are not filled by Regular Employees. Temporary employees do not receive voluntary benefits offered by GLCAP. Temporary employees may be employed by GLCAP or through a temporary agency.

**FLSA Status:** In addition to appointment to the status’ specified above, employees shall be categorized as either exempt or non-exempt from the Fair Labor Standards Act overtime provisions. Non-employees providing services for GLCAP are categorized as independent contractors.

**Non-Exempt Employee:** Positions in which employees are paid for all hours worked and receive overtime pay at the rate of time and one half for hours worked that exceed 40 hours in the designated 168 hour work period which extends from 12:00 a.m. Sunday through the end of the following Saturday.

**Exempt Employee:** Positions in which employees are paid a pre-determined weekly salary that is considered full compensation for all hours worked in that work week. Accordingly, exempt employees do not receive additional wages for time worked that exceeds 40 hours in the designated 168 hour work period. Exempt employees are not eligible for overtime pay because the position meets the exemption test requirements of the Fair Labor Standards Act.
**Non-Employee Definitions:**

**Independent Contractors:** A person who receives compensation for professional or technical services at a fee agreed upon and paid by GLCAP, who is engaged as an independent contractor (or third-party contractor) for specified services and not a GLCAP employee. Independent Contractors will be informed that their compensation will be reported to the IRS and IRS Form 1099 will be issued for payments of six hundred dollars ($600) or more made to contractors annually. The working relationship between the independent contractor and GLCAP shall not be governed by these policies, but rather shall be specified solely by contractual agreement.

**Volunteer:** A person who is unpaid and trained to assist in implementing program activities on a regular basis under the supervision of a staff person in areas such as health, education, transportation, nutrition, and management.
SECTION 3

AFFIRMATION OF NON-DISCRIMINATION

3.1 Equal Employment Opportunity (EEO) (rev. 03/09/21)

Policy: GLCAP is an equal employment opportunity employer. Employment decisions are based on merit and business needs, and not on race, color, citizenship status, national origin, ancestry, gender, sexual orientation (including sexual harassment), age (40 years old or more), religion, creed, physical or mental disability, marital status, veteran status, political affiliation, military status, economic status, ethnicity, culture, family composition, employee and family genetic information or any other factor protected by law. GLCAP will adhere to fair employment practice laws relevant to each state in which our employees work.

Any individual, agency, company, or service provider who enters into a contract with GLCAP is required to conduct its business and operations in accordance with all applicable equal employment laws and regulations, and to provide its services in a non-discriminatory manner without regard to the recipient’s race, color, citizenship status, national origin, ancestry, gender, sexual orientation (including sexual harassment), age (40 years old or more), religion, creed, physical or mental disability, marital status, veteran status, political affiliation, military status, economic status, employee and family genetic information or any other factor protected by law.

If any employee, including management, is found, after an investigation, to have engaged in any unlawful discrimination or policy infraction, such person shall be subject to appropriate disciplinary action, up to and including discharge from employment. Reports made to the supervisor shall be forwarded to the EEO Coordinator.

Procedure: Equal employment opportunity and other employment law notices are posted near employee gathering areas.

Management is responsible for ensuring that GLCAP equal employment opportunity policies are implemented, but all employees share in the responsibility for ensuring their personal conduct complies with the spirit and letter of GLCAP equal employment opportunity policy.

Employees who have EEO related questions, problems, or complaints are encouraged to communicate their concerns to their supervisor or the EEO Coordinator.

The EEO Coordinator will investigate and attempt to resolve the issue by questioning the employee and those who may have knowledge of the issue or similar concerns. The investigation process and results will be documented, as will the resolution of the complaint.

3.2 Americans with Disabilities Act (ADA) & Amendments Act (ADAAA) (rev. 03/08/16)

Policy: GLCAP complies with all relevant and applicable provisions of the Americans with Disabilities Act (ADA). GLCAP 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.

Confidentiality: The medical condition and records of an employee with a serious disease or disability are confidential as is the genetic information of employees and their family members as defined by the Genetic Information Nondiscrimination Act. Human Resources shall have access to medical information necessary for approving leaves, considering accommodations, for other business reasons, and may be given or gain access to employee or family genetic information when administering the Family Medical Leave Act. Human Resources will share this confidential information with others only on a business need to know basis.
3.2  **Americans with Disabilities Act (ADA) & Amendments Act (ADAAA) (continued):**

Employees are discouraged from discussing, gossiping, or provoking discussion about an employee’s disease, disability or medical condition. Such matters are private and may not be discussed in the workplace, except as such discussion relates to the conduct of official management responsibilities.

**Procedure:** Employment opportunities will be afforded to persons with disabilities who are qualified to perform the essential functions of the job with or without reasonable accommodation. GLCAP will seek reasonable accommodations that do not result in undue hardship on business operations for qualified individuals with disabilities. Human Resources shall be responsible for coordinating and monitoring ADA compliance, including but not limited to records management and documentation, confidentiality of related medical records, and consultation with management regarding requests for accommodation. Employees who experience disability may be entitled to leave under the Family and Medical Leave Act (FMLA) or an extension of their medical leave as a reasonable accommodation under the ADA. Questions regarding leave rights should be directed to Human Resources. Employees with a qualifying disability that requires accommodation should contact Human Resources.

3.3  **Equal Opportunity Is The Law**  

**(rev. 03/09/21)**

**Policy:** GLCAP is committed to equal opportunity regardless of age, gender, marital status, disability, race, color, sexual orientation, religion, national origin, political affiliation or belief, military status, veteran status, citizenship status, ethnicity, culture, family composition, or other similar factors, for participation in programs or activities in accordance with the following provisions:

**Title VI of the Civil Rights Act:**

No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving Federal financial assistance.

**Federal Transit Laws, 49 U.S.C. 5332 Nondiscrimination**

No person in the United States shall on the grounds of race, color, religion, national origin, sex, disability, or age be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any project, program or activity funded in whole or in part through financial assistance under this Act.

**Section 504 of the Rehabilitation Act of 1973:**

No otherwise qualified individual with a disability in the United States, as defined in section 705 (20) of this title, shall solely by reason of his or her disability, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance or under any program or activity conducted by any Executive agency or by the United States Postal Service. Reasonable modifications will be made to policies, practices, and procedures when necessary to ensure access to services for qualified individuals unless:

- making the accommodation would fundamentally alter the nature of the service;
- making the accommodation would create a direct threat to the health or safety of other clients; or
- the individual with a disability is able to fully use services without the accommodation being made.
3.3 Equal Opportunity Is The Law (continued)

Title IX:
No person in the United States shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving Federal financial assistance.

Age Discrimination in Employment Act of 1967:
No person in the United States shall be, on the basis of age excluded from participation in, denied the benefits of or subjected to discrimination under, any program or activity receiving Federal financial assistance.

Section 188 of the Workforce Innovation and Opportunity Act:
It is against the law for this recipient of Federal financial assistance to discriminate on the following bases:

- against any individual in the United States, on the basis of race, color, religion, sex, national origin, age, disability, political affiliation or belief; and
- against any beneficiary of programs financially assisted under Title I of the Workforce Investment Act of 1998 (WIA), on the basis of the beneficiary’s citizenship/status as a lawfully admitted immigrant authorized to work in the United States, or his or her participation in any WIA Title I-financially assisted program or activity.

The recipient must not discriminate in any of the following areas:

- deciding who will be admitted, or have access, to any WIA Title I-financially assisted program or activity;
- providing opportunities in, or treating any person with regard to, such a program or activity; or
- making employment decisions in the administration of, or in connection with, such program or activity.

Requesting Reasonable Modifications Procedure: Individuals requesting modifications shall describe what they need in order to use the service and are not required to use the term “reasonable modification” when making a request. Requests for accommodation may be made either orally or in writing. The reasonable accommodation process begins as soon as the request for accommodation is made. The request can be submitted in any written format. Alternative means of filing a request, such as personal interviews, phone calls, or taped requests, will be made available for persons with disabilities if unable to communicate their request in writing or upon request.

When a request for accommodation is made, the EEO/ADA Coordinator, the program director as needed, and the individual requesting an accommodation must engage in a good faith interactive process to determine what, if any accommodation shall be provided. The individual and the EEO/ADA Coordinator must communicate with each other about the request, the process for determining whether an accommodation will be provided, and the potential accommodations. Communication is a priority throughout the entire process.

The EEO/ADA Coordinator will process requests for reasonable accommodation and then provide accommodations, where appropriate, in as short a time frame as reasonably possible.
3.3 Equal Opportunity Is The Law (continued)

GLCAP recognizes, however, that the time necessary to process a request will depend on the nature of the accommodation(s) requested and whether it is necessary to obtain supporting information.

Once the EEO/ADA Coordinator determines that a reasonable accommodation will be provided, the decision shall be immediately communicated to the individual. This notice must be in writing in order to maintain the required information for reporting purposes. Upon request, alternative means of response will be provided.

If the EEO/ADA Coordinator determines that a request for reasonable accommodation will be denied, the EEO/ADA Coordinator will communicate the basis for the decision in writing to the individual requesting the modification. The explanation for the denial will clearly state:

- the specific reasons for the denial;
- any alternative accommodation that may create the same access to transit services as requested by the individual; and
- the opportunity to file a complaint relative to the decision on the request.

Equal Opportunity/ADA Complaint Procedures: Any person seeking information concerning these laws or filing a complaint because of an alleged violation should contact the EEO/ADA Coordinator by one of the following methods: call (800) 775-9767, ext. 6001 (TTY 800-750-0750); email comment@glcap.org; or visit the administrative office at 127 S. Front Street, Fremont, OH 43420. If information is needed in another language, please contact (800)775-9767.

Any person who believes she or he has been discriminated against by GLCAP may file a complaint by completing and submitting the Equal Opportunity Complaint Comment form to the EEO/ADA Coordinator. GLCAP investigates complaints received no more than 180 days after the alleged incident. All complaints will be reviewed in terms of laws, and persons involved will be advised of the provisions of the law and their legal rights.

Once the complaint is received, the EEO/ADA Coordinator will review the complaint to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office.

GLCAP has five business days to investigate the complaint. If more information is needed to resolve the case, GLCAP may contact the complainant. The complainant has five business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within five business days, GLCAP can administratively close the case. A case can also be administratively closed if the complainant no longer wishes to pursue their case.

After the investigator reviews the complaint, she/he will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not an Equal Opportunity/ADA violation and that the case will be closed.
3.3 **Equal Opportunity Is The Law (continued)**

An LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member or other action will occur. If the complainant wishes to appeal the decision, she/he has five business days after the date of the letter or the LOF to do so. The office will maintain a record of all Equal Opportunity complaints.

Participants wishing to pursue a civil rights complaint beyond the agency level should direct their inquiries to the appropriate agency listed below:

(1) **Department of Agriculture:** All programs, services, and regulatory activities relating to farming and the raising of livestock, including extension services.

(2) **Department of Education:** All programs, services, and regulatory activities relating to the operation of elementary and secondary education systems and institutions, institutions of higher education and vocational education (other than schools of medicine, dentistry, nursing, and other health-related schools), and libraries.

(3) **Department of Health and Human Services:** All programs, services, and regulatory activities relating to the provision of health care and social services, including schools of medicine, dentistry, nursing, and other health-related schools, the operation of health care and social service providers and institutions, including “grass-roots” and community services organizations and programs, and preschool and daycare programs.

(4) **Department of Housing and Urban Development:** All programs, services, and regulatory activities relating to state and local public housing, and housing assistance and referral.

(5) **Department of Interior:** All programs, services, and regulatory activities relating to lands and natural resources, including parks and recreation, water and waste management, environmental protection, energy, historic and cultural preservation, and museums.

(6) **Department of Justice:** All programs, services, and regulatory activities relating to law enforcement, public safety, and the administration of justice, including courts and correctional institutions; commerce and industry, including general economic development, banking and finance, consumer protection, insurance, and small business; planning, development, and regulation (unless assigned to other designated agencies); state and local government support services (e.g., audit, personnel, comptroller, administrative services); all other government functions not assigned to other designated agencies.

(7) **Department of Labor:** All programs, services, and regulatory activities relating to labor and the work force.

(8) **Federal Transit Administration, Office of Civil Rights:** All programs, services, and regulatory activities relating to transportation. Upon receipt of a disability related complaint, the Ohio Department of Transportation, Office of Transit will be notified by email.
SECTION 4
HIRING

4.1 Employment Applications

Policy: GLCAP shall accept employment applications and resumes only when a position is open, or is anticipated to be vacated, and for which GLCAP is currently advertising.

Every external applicant seeking employment with GLCAP is required to complete an online employment application to be considered for a vacancy. All applications must be received in Human Resources by the deadline date to be considered for a position. Current GLCAP employees may view and apply for job openings online by logging into Kronos.

Dishonest or incomplete information provided on the application will disqualify the applicant. If the applicant is hired and it is subsequently discovered that the information provided during the hiring process was false or incomplete, or if it is discovered that any other disqualifying criteria apply, the employee will be subject to discharge from employment.

Human Resources shall be responsible for retaining all application forms, resumes and other selection documents for a time period that complies with applicable employment and funding laws and regulations.

Procedure: Postings for vacant positions shall be posted at www.glcap.org and can be viewed through Kronos. All external applicants shall complete and submit their application online to be electronically forwarded to Human Resources. Applicants who apply through an online job board must update their application if selected for an interview. In the event that an applicant walks into a GLCAP facility to complete an application form, the applicant will be informed of the electronic filing process. GLCAP will not accept resumes from applicants without an application completed in its entirety. Internal applicants shall apply online through Kronos and must send a current resume to Human Resources.

Hiring supervisors shall consider only those applications that are submitted in accordance with the instructions and timeframes specified in the job posting or advertisement and which were screened and forwarded electronically by Human Resources.

In addition to information requested on the application form, applicants may be required to submit additional job related and non-discriminatory information or documentation Human Resources determines necessary.

Human Resources maintains applications and notifies hiring supervisors when applications are referred for their review. Following the selection process, hiring supervisors are required to shred all applications and resumes of applicants who were hired and rejected. The application and resume of the applicant selected for hire and employment with GLCAP will be retained by Human Resources in that employee’s personnel file.

All applications of rejected applicants will be retained by Human Resources for a period of six years following the date of submission. Applications may or may not be considered for future job openings at the discretion of Human Resources. GLCAP maintains no responsibility for searching previously submitted applications for future openings unless it is in the business interests of GLCAP to do so.

In the event that it is discovered that an employee provided false or incomplete information during the hiring process, the supervisor or the employee with such information is expected to notify Human Resources.
4.2 In-House Announcement

Policy: Job openings for regular positions shall be posted in-house to provide an equal opportunity for interested employees who meet the position’s minimum qualifications to apply for the vacancy. Job openings for temporary, acting, or on-call positions are not required to be posted in-house.

Employees who occupy a regular position, with at least 1 year of successful service with GLCAP, are eligible to be considered an in-house applicant for vacant, posted positions.

Regular employees on layoff, with at least 1 year of successful service with GLCAP, are eligible to be considered as in-house applicants but such eligibility shall be limited to a maximum of three months following the last date of employment with GLCAP.

No employee will be eligible for consideration as an in-house applicant when that employee’s performance evaluations within the past two years do not substantiate performance to expected standards or when the employee’s personnel file includes more than one written reprimand or a suspension without pay within the past 12 months.

In-house announcements are intended to give opportunity for current and recently laid off employees to apply for positions in which they are interested and believe they are qualified, and to offer career paths and opportunities. However, GLCAP hires the best qualified and suited applicant for every vacant position, whether from internal recruitment sources or external. Therefore, in-house applicants shall not be guaranteed appointment or given preference to vacancies over external applicants who are more qualified and suited for the position.

Procedure: When a vacancy occurs in a regular position, the hiring supervisor is required to complete the Recruitment Request form and forward the completed and signed form to Human Resources.

Human Resources will prepare and post the In-House Announcement for all employees to see using Kronos. Employees will have 4 ½ working days from the date of posting to apply for a position through Kronos and submit a current resume to Human Resources.

Human Resources will record and process the in-house applications including screening the applications to determine time in service eligibility, if the applicant’s job performance and conduct meet expectations, and if the applicant’s experience, education, training and background meet the minimum qualifications. Human Resources will process external applications to determine if the applicant’s experience, education, training and background meet the minimum qualifications. After screening the applications, Human Resources will refer applications to the hiring supervisor for consideration.

Hiring supervisors are not permitted to fill a position prior to receiving notification from Human Resources that all applications have been referred. When a job vacancy is initially posted internally [without external recruitment], and the hiring supervisor determines that none of the available applicants are best qualified and suited for the position, the hiring supervisor will notify Human Resources, who will initiate the external advertising process in accordance with that policy and procedure. After fair and equal consideration is given to all applications in accordance with these policies and procedures, the hiring supervisor may hire a qualified, best suited candidate to fill the vacancy.
4.3 **External Advertisements**

*Policy:* Position vacancies may be advertised externally simultaneously with the in-house announcement as determined by Human Resources. Human Resources shall be responsible for determining the advertising sources, and placing advertisements in relevant media, including but not limited to recruiting sources specified in the GLCAP Affirmative Action Plan.

*Procedure:* When a hiring supervisor submits a Recruitment Request form to Human Resources, Human Resources will consult with the hiring supervisor to assess the need and benefits of advertising the vacant position externally and simultaneously with the in-house posting. Supervisors are encouraged to note on the Recruitment Request form their recommendation as to whether or not external advertising is needed or preferred, and potential recruitment sources. Human Resources maintains authority to make the final decisions regarding these matters to ensure that GLCAP works toward achieving diversity and affirmative action goals and that recruitment efforts yield the best qualified and suited applicants.

If Human Resources determines that facts and circumstances substantiate external advertising, Human Resources will prepare the external advertisement and will send to those sources which are determined to be most relevant and cost effective, including but not limited to newspaper classifieds; online career boards; trade journals; placement offices at local universities; colleges, technical schools; partner/association websites and publications; and other recruiting sources.

Likewise, in accordance with affirmative action plan goals, recruitment resources will be utilized to recruit best qualified and suitable individuals who will help achieve workplace diversity in jobs that are currently underutilized.

When a position remains unfilled from the initial internal posting and external advertising, Human Resources may renew external job advertisements or advertise in other venues.

Human Resources will periodically evaluate the effectiveness of recruitment resources to assess and substantiate the most effective and economical means of recruiting qualified and suitable applicants and for achieving hiring goals.

**INTERVIEW AND SELECTION**

4.4 **Interview**

*Policy:* In-house applicants who meet the minimum qualifications for a job and who timely apply in accordance with in-house posting instructions will receive an interview. Outside applicants are eligible to be considered for an interview when they meet the minimum qualifications for a job and timely apply in accordance with instructions included in the job advertisement. Only the best qualified and suited applicants from that group will receive an interview.

*Procedure:* Human Resources will conduct the initial screening of all internal and external applications and will refer those that meet the minimum qualifications and other hiring criteria to the hiring supervisor. Applications not meeting minimum requirements will be retained by Human Resources in accordance with these policies and procedures.

Each in-house applicant referred by Human Resources to the hiring supervisor will be scheduled for an interview by the hiring supervisor. In addition, the hiring supervisor will evaluate each of the external applications referred by Human Resources and will determine those to be interviewed.
4.4 **Interview (continued)**

In the event that an in-house applicant does not meet the minimum qualifications for the position or is otherwise screened from eligibility for a job interview, the applicant will receive written notification from Human Resources. At the request of the employee, Human Resources will be available to discuss job goals and the specific requirements and competencies needed to support the employee in working toward achieving career goals.

4.5 **Hiring Authority** *(rev. 03/09/21)*

**Policy:** The following positions maintain hiring authority.

- **Hiring Supervisors:** maintain authority to select and hire all positions which are under their direct control and authority. Depending on the job, decisions of hiring supervisors may or may not be required to be reviewed and prior approved by a next higher level of management, a Director, or other person as required.

- **Early Childhood Program Supervisors:** Early Childhood Program Supervisors must receive approval from Policy Council or Policy Committee of the hiring decision prior to offering employment to an applicant.

- **Top Management and Key Personnel:** The Board of Directors maintains authority to hire the President/CEO. The President/CEO maintains authority to hire the Vice President, Chief Financial Officer and program and cost center directors. Notwithstanding, the hiring of certain top management personnel is subject to the notification and approval process specified below when the top management personnel’s salary will be paid more than 50 percent using Head Start/Early Head Start funds.

  - **Notification and Approval for the Hiring of Top Management and Key Personnel:** Prior to offering a position to an applicant for the President/CEO, Vice President, Chief Financial Officer, Child Development & Rural Transit Director (designated Head Start Director), and Human Resource Director positions, GLCAP must receive approval from Policy Council, Policy Committee, and notify the Region 5 Office of Head Start of the decision. The notification must include the name of the applicant recommended for hire, the process used to recruit for the position, and why the applicant is determined to be the best suited and qualified.

4.6 **Selection** *(rev. 03/09/21)*

**Policy:** Selection for position openings will be based on the applicants’ qualifications, suitability, and ability to meet job requirements and perform job duties to performance standards.

Hiring supervisors shall be responsible for knowing and following these selection policies and for developing the competency to make informed and appropriate selection decisions in accordance with generally accepted human resource practices and applicable employment laws and regulations. Hiring supervisors or Human Resources, through impartial and consistently applied selection criteria, may disqualify an applicant from consideration at any time during the selection process or following a conditional offer of employment if the applicant:

- **a.** does not possess the educational or experience background, or the competencies, knowledge, skills and abilities necessary to perform essential duties of the vacant position to expected performance standards

- **b.** fails to successfully pass any valid and reliable pre-employment test including but not limited to cognitive or skill tests, or other selection processes required for the job
4.6 Selection (continued)

c. fails to attend a scheduled job interview or fails to successfully complete the job interview
d. does not possess, or is unable to obtain, any state, or federally mandated license or certification required to perform the job
e. has unfavorable professional references, demonstrates an unsatisfactory work record with former employers, or has an unstable work record, including job hopping or unexplained or inexcusable gaps in employment
f. fails a criminal background check that is job-related for the position in question and consistent with business necessity or pre-employment drug or alcohol test
g. fails to successfully complete a required medical physical examination
h. fails a required driving abstract records check [for positions in which driving is an essential job function]
i. fails to give authorization, or fails to cooperate in a required criminal background check, reference check, driving record check, or drug or alcohol test
j. is found to have made a false statement, or committed [or attempted to commit] a fraudulent act of material fact on a resume, application form or at any time during the selection process
k. fails to timely submit to or participate in any of the required steps of selection process
l. is an alien without authorization to work in the United States
m. fails to meet job requirements for any other reasonable and lawful grounds.

Procedure: Hiring supervisors will use the Interview Rating form provided by Human Resources to rate each of the applicants interviewed to assess the applicant and document the results of the interview. Any ratings and comments made on the Interview Rating Form shall be job related and compliant with the spirit and letter of GLCAP policy of non-discrimination. Results recorded on the interview rating form will be considered when determining the applicants who will be given further consideration.

Hiring supervisors will give all outside applicants the Hiring Forms to complete prior to the interview. Hiring forms consist of authorization releases for the Fair Credit Reporting Act Consumer Report Disclosure, employer reference check, pre-employment drug and alcohol testing consent, physical examination consent and the motor vehicle records check. A refusal will disqualify the applicant from being interviewed.

The hiring supervisor will identify the preferred applicants and conduct three references checks for each. Work references are strongly preferred and shall be solicited whenever the applicant has a prior work record. In the event that an applicant does not have three work references, personal references will be accepted. Notes from the reference check will be neatly organized and reported on the reference check form. The results of the reference checks will be given consideration when further qualifying or disqualifying the applicant.

When a current or former GLCAP employee is being considered for the vacancy, the hiring supervisor is expected to review the employment record of the applicant, along with conducting reference checks of current and former supervisors to discuss and assess the candidate’s job performance, conduct and other job related factors.
4.6 Selection (continued)

All interview rating forms, hiring authorization forms, and at least three completed and signed reference check forms for each of the preferred applicants must be sent to Human Resources for review and approval prior to making a conditional job offer. Human Resources will retain the interview rating form, hiring authorization forms, and reference checks of the selected applicant in the employee’s personnel file, and will retain these documents for the rejected applicants in a separate file for a minimum of six years.

When hiring Early Childhood Program employees the Child Development & Rural Transit Director must notify the Policy Council or Policy Committee of the conditional offer and gain approval from the Policy Council or Policy Committee prior to making a final offer.

All offers of employment will be conditional based on meeting all conditions of employment applicable to the particular position including Policy Council or Policy Committee approval when applicable.

When hiring for key personnel, Human Resources, in collaboration with the hiring group will request approval from Policy Council or Policy Committee and prepare and submit a written letter to the Region 5 Office of Head Start identifying and recommending the applicant for hire, the position recommended for hire, the process used to recruit for the position, and why the applicant is determined to be the best suited and qualified. The Regional Office will review the information to assure a reasonable process was used to seek and fill the position and submit its response to Human Resources. Once notification and approval is received from the Regional Office, the position may be offered to the recommended applicant.

4.7 Applicant Notification

Policy: Applicants selected for a position will receive written notification of hire. Applicants interviewed but not selected for a position will be notified, in writing, that the position has been filled. Notification of appointment shall be written in a manner so that it is not construed to be a contract of employment.

Procedure: Offers of employment shall be in writing with the offer clearly identified as conditional upon successful results of post offer requirements. Conditions applicable to all new hires include a criminal background check, drug and alcohol test, and I-9 requirements. In-house appointments to posted positions are subject to criminal background check and drug and alcohol tests but not I-9 documentation.

In addition, depending on the position, some applicants recruited from external advertising or in-house postings require, as a condition of hire, a motor vehicle driving check and physical exam.

Supervisors will notify the new employee in writing of a conditional offer and request acceptance of the terms prior to the employee’s start date. A copy of the notice will be filed in Human Resources. Supervisors will work with the applicant through the post offer requirements and schedule new hire orientation.

Supervisors will notify applicants interviewed but not selected for the position that the position has been filled.
**POST OFFER REQUIREMENTS**

**4.8 Post Offer Investigation/Background Check**

*(New 03/08/16)*

**Policy:** GLCAP conducts an investigation on all applicants considered for employment to determine or verify background information, including criminal history and information in compliance with the Fair Credit Reporting Act (FCRA). Having a criminal history or criminal conviction does not necessarily preclude employment. As a condition of continued employment, ongoing and periodic investigative and/or background checks are required by law or regulation for certain positions.

**Procedure:** Applicants who are selected for interview are required to sign a release form authorizing the investigation and release of information by former employers, educational institutions, or other organizations as part of the reference and background check process. A refusal to sign the release form will disqualify the applicant from further consideration.

**4.9 Motor Vehicle Driving Record Checks**

*(rev. 03/08/16)*

**Policy:** Prior to hire and periodically throughout employment, a Motor Vehicle Record (MVR) check shall be required for any position in which driving is an essential job requirement. An offer of employment or continued employment is conditional upon receipt of MVR results that meet insurability requirements.

**Procedure:** As part of a conditional offer of employment, the hiring supervisor will require the selected applicants, whose position requires driving, to undergo a motor vehicle driving check. Applicants will be requested to complete the Motor Vehicle Records Check Release form at the job interview. Any applicant who refuses to authorize a motor vehicle driving record check will be disqualified from further consideration. The hiring supervisor will submit the Motor Vehicle Records Check Release form to Human Resources with the interview rating tool and other post offer authorization forms. The MVR check must be completed prior to beginning employment. GLCAP will pay for MVR checks required as a condition of employment.

In-house applicants are subject to a motor vehicle record check if the applicant is not on the list of covered drivers submitted to the insurance company.

GLCAP’s insurance provider will obtain records from the State of Ohio Bureau of Motor Vehicles and will determine if the applicant has an acceptable driving history/record.

**4.10 Physical Examinations**

*(rev. 03/09/21)*

**Policy:** A physical examination and/or current vaccinations are required by law or regulation for some positions. All offers of employment for these positions will be conditional upon the successful completion of these requirements. All other conditions of the employment offer will be successfully completed prior to the conditional employee being required to submit to the physical examination and/or current vaccinations.

Additionally, following employment, periodic physical exams are required by law or regulation for certain positions. GLCAP will not use employee and family genetic information or the medical information derived from the examination in a discriminatory manner, including but not limited to employment decisions in violation of Americans With Disabilities Act requirements or Genetic Information Nondiscrimination Act.
4.10 Physical Examinations (continued)

Procedure: The hiring supervisor will notify applicants of physical examination and vaccination requirements at the job interview by providing the applicant with a written statement issued by Human Resources. These requirements must be completed as a condition of and prior to beginning employment.

In-house applicants are subject to a physical examination and/or current vaccinations if the applicant does not have a physical on file that meets the requirements of the position.

Applicants are responsible for the cost of any required physical examination or vaccination. Supervisors will contact the applicant once all other post offer requirements are successfully completed. The physical examination and vaccination requirements must be on file with Human Resources prior to beginning employment.

Human Resources will notify the supervisor prior to an employee’s physical expiration date for positions that require periodic physical examinations. The supervisor will notify the employee. The employee must provide an updated physical on or before the expiration date of the physical on file with Human Resources. Employees who fail to provide an updated physical on or before the due date will not be scheduled to work beyond the expiration date and may result in disciplinary action up to and including termination.

Employees are responsible for the cost of any required periodic physical examination or vaccination.

4.11 Criminal Background Checks and Database Reviews

Policy: Criminal background checks and database reviews are required as a condition of initial hire for all positions. All offers of employment are conditional upon successfully passing the criminal background check and the database reviews. As a condition of continued employment, ongoing and periodic criminal records checks and database reviews are required by law or regulation for certain positions.

Applicants or employees who have been convicted of, or plead guilty to, crimes listed in specified applicable sections of the Ohio Revised Code are not eligible for employment in certain positions. In other positions, GLCAP will determine the relevancy of the criminal convictions and whether the conviction disqualifies the applicant or employee from further consideration for employment or continued employment.

In general, except as otherwise required by the Ohio Revised Code or other requirements, felony convictions will not necessarily constitute a basis for disqualification for employment, but will be considered strong evidence of lack of fitness for a position. In the event that a check reveals a criminal conviction, GLCAP will require full disclosure and documentation regarding the conviction and the applicant shall be provided an opportunity to demonstrate that the exclusion does not properly apply. The information provided shall be considered when making a final hiring or continued employment decision. An applicant with a conviction record may be hired or an employee may continue employment only after a thorough investigation is completed by Human Resources. The Director maintains authority to approve the hire or continued employment of a person with a criminal history assuming rehabilitation standards have been met. Arrest records in which there was no conviction are not considered in making the determination.
4.11 Criminal Background Checks and Database Reviews (continued)

Procedure: At the job interview, the hiring supervisor will request that each applicant complete the required authorization form. Likewise, an applicant who is applying for a position for which a criminal background check is required by the Ohio Revised Code shall be required to sign a non-conviction statement that certifies that the applicant has not been convicted of, or plead guilty to, crimes listed in specific sections of the Ohio Revised Code. Any applicant who refuses to authorize database reviews, a criminal background check or a required certification of non-conviction will be disqualified from further consideration.

In-house applicants are subject to a criminal background check and database reviews if the applicant has not had a criminal background check and database reviews upon initial hire or transfer to a new position, or the position applied for requires the applicant to sign a non-conviction statement certifying that the applicant has not been convicted of, or plead guilty to, crimes listed in specific sections of the Ohio Revised Code and the previous criminal background check conducted was not subject to the specific convictions listed on the non-conviction statement.

Human Resources will initiate the criminal background check only after a conditional job offer has been made. Background checks will be conducted by the Bureau of Criminal Identification and Investigation (BCII) and GLCAP will pay for the criminal background check. BCII will notify Human Resources of the results of the criminal background check and Human Resources will notify the hiring supervisor.

In the event a criminal background check reveals a felony conviction, Human Resources in consideration of applicable laws and regulations, including but not limited to the relevancy of the conviction to the job, the nature and gravity of the offense or conduct, the time that has passed since the offense, conduct and/or completion of the sentence will determine whether to qualify or disqualify the applicant. Human Resources will contact the Director to determine if hiring approval is granted.

Directors are responsible for notifying Human Resources which positions require background checks and for providing the list of criminal offenses that automatically disqualifies applicants or employees, as well as other disqualifying criteria specified by law.

4.12 Pre-Employment Drug and Alcohol Screening (rev. 03/08/16)

Policy: GLCAP is committed to providing a safe work environment and promoting the well-being and health of others. Therefore, GLCAP complies with federal law and adheres to the Drug Free Workplace Act of 1988 and requires pre-employment drug screening for all positions and pre-employment alcohol screening for positions subject to Department of Transportation regulations. All offers of employment and appointments are conditional upon receipt of a negative drug and alcohol screening. Any applicant with a confirmed positive test will be denied employment. An applicant with a confirmed positive test will be disqualified from applying for another job with GLCAP for a one-year period. Applicants must provide GLCAP proof of having successfully completed a referral, evaluation, and treatment plan. The cost for assessment and any subsequent treatment will be the sole responsibility of the applicant.
4.12 **Pre-Employment Drug and Alcohol Screening (continued)**

**Procedure:** The hiring supervisor will request that each applicant sign a drug and alcohol test authorization form at the job interview. Any applicant who refuses to authorize a drug and/or alcohol test will be disqualified from further consideration.

In-house applicants are subject to pre-employment drug and alcohol testing if the applicant has not had a pre-employment drug and alcohol test upon initial hire, transfer, or reassignment to a new position, or the position applied for is regulated by the Department of Transportation (DOT).

Drug and alcohol screenings must be completed following a conditional offer of employment and prior to beginning employment. GLCAP will pay for the drug and alcohol screenings.

When administering this policy, the guidelines specified in the Drug-Free Workplace policy located in the Standards of Conduct section of this handbook apply and shall be followed.

4.13 **Orientation**

*(rev. 05/10/11)*

**Policy:** GLCAP requires all new hires to complete a formal new employee orientation program to introduce and orient each new employee to GLCAP work culture, its vision and mission, job expectations, policies and other requirements of employment. Regardless of the amount and type of orientation provided each new employee is responsible for seeking out the information needed and asking questions to ensure expected performance and conduct standards are met.

**Procedure:** Orientation training begins the first day of work and continues until the items listed in the new employee orientation packet are reviewed with the employee.

Human Resources will schedule the employee for orientation once all requirements for employment have been met. On the employee’s first day of employment, the employee shall begin the orientation process by reporting to Human Resources. Following the items and responsibilities specified on the orientation form, the supervisor, Human Resources and other specified persons shall conduct their portions of orientation with the new employee.

Upon successful completion of each item listed on the orientation form, the item will be initialed and dated by both the employee and the person providing training. Following orientation, both the employee’s supervisor and the employee will sign the form to signify that the topic areas listed were covered sufficiently and to substantiate the employee’s understanding. The completed and signed list shall be retained by Human Resources in the employee’s personnel file.

If during orientation, or otherwise during the course of employment, a newly hired employee is unable to perform one or more essential job duties because of a disability, the employee should make this known to Human Resources who will consider making a reasonable accommodation that enables the new employee to perform essential job duties, insofar as the accommodation does not create an undue hardship on GLCAP (See the ADA Accommodations policy located in the Affirmation of Non-Discrimination Section of this manual).
4.14 Nepotism

**Policy:** GLCAP wants to ensure that corporate practices do not create situations such as conflict of interest or favoritism. This extends to practices that involve employee hiring, promotion and transfer. Close relatives, live-in partners, those in a dating relationship or members of the same household are not permitted to be in positions within the supervisory chain of a member of their family, their spouse’s family, or live-in partner’s family. For purposes of this policy, close relatives is defined as mother, father, stepmother, stepfather, spouse, brother, sister, step-brother, step-sister, children, stepchildren, guardian, ward, grandparents, grandchildren, aunts, uncles, nieces, nephews, first cousins, or the corresponding relatives of their spouse or live-in partner.

Individuals will not be hired or promoted into a position that would create a conflict in GLCAP policy. If employees become relatives (i.e. through marriage of external parties) or members of the same household and one party is in a supervisory position, that person is required to inform management and Human Resources of the relationship.

An employee may hold a position at the same location as a family member, provided that both the Director and Human Resources have approved the working relationship and provided the working relationship does not interfere with business operations or services, present a conflict of interest, is a causative factor in labor relations issues, or if it otherwise creates disruption or other problems affecting normal business. Approval to work together in the same location is conditional based on each of the employees demonstrating compliance with this policy through their conduct and performance.

An employee may not hold a position while they, or a member of their immediate family, serves on the Board of Directors, Head Start Policy Council, Policy Committee, or any committee that sets policy relating to the employee’s job. For purposes of this policy immediate family is defined as mother, father, stepmother, stepfather, spouse, brother, sister, children, stepchildren, guardian, ward, grandparents, grandchildren, or the corresponding relatives of the spouse. In addition, due to the nature of the work inherent to the following positions, family members will not be considered for employment with GLCAP: President/CEO, Chief Financial Officer, Comptroller, Human Resource Director, and Human Resource Specialist.

**Procedure:** Supervisors shall not hire persons into a position which is in conflict with this nepotism policy. The immediate supervisor must certify on the interview tool that the applicant does not violate the Nepotism policy. Failure to certify will result in the delay of the job offer until the statement is submitted.

If employees become relatives (i.e. through marriage of external parties) or members of the same household that place them within the supervisory chain of a member of their family, spouse’s family, or live-in partner’s family, their supervisor must be notified in writing immediately. The employees will have 60 days to resolve the situation on their own.

If another position is vacant and slated to be filled for which either of the employees is qualified, either of the employees may apply for the vacancy in accordance with GLCAP job posting procedures. Nothing within this policy shall be construed to mean that an employee in this situation has any rights of hire over other internal or external applicants applying to fill the position. GLCAP shall follow its normal selection policy and procedure and will evaluate all candidates on equal selection criteria, with the intent of selecting only the best suited and qualified applicant for each vacant position. In addition, no position will be created without justifiable business reason, or for the sole or primary purpose of creating a vacancy to which one of the employees may be hired.
4.14 **Nepotism (continued)**

After 60 days, if the employees have not yet resolved the situation on their own by means such as a transfer or employment outside of the company, the Director will work with Human Resources to determine the most appropriate action for the specific situation. This may include transfer to a different position, transfer to a new supervisor, or termination of one of the employees. In the event termination of one employee is necessary, determination will be made by the Director and Human Resources in consideration of job performance, records of conduct, disciplinary record, attendance record, job competencies, seniority, job location, and other business factors.

If employees become relatives (i.e. through marriage) and they do not work within the supervisory chain, but work in the same location, both of their supervisors must be notified in writing immediately. The supervisors shall notify the Director and Human Resources, who shall consider the facts and circumstances and determine if the working relationship conflicts with the nepotism policy. As soon as feasible after notification, Human Resources and the Director will notify the employees of the approval or denial to continue working in the same location. Employees who are denied to work in the same location will be offered the same options as are provided to employees who become relatives in the same supervisory chain.

4.15 **Rehired Employees** *(rev. 03/08/16)*

**Policy:** Employees who have been discharged involuntarily or who resigned in lieu of discharge from employment are not eligible for rehire. Employees who resigned voluntarily or were laid off permanently are eligible for rehire with prior authorization from the Director and with the concurrence of Human Resources following a review of the former employee’s employment record.

If determined eligible for rehire, the former employee will be considered on the same qualifying criteria as other applicants for the position in determining fitness to perform the job as compared to other job applicants.

**Procedure:** The hiring supervisor must submit to the Director any request to hire an employee who previously resigned or was laid off permanently from GLCAP. The request shall be submitted through the supervisory chain until it reaches the Director with recommendations for hire or no hire included from each supervisory level.

Upon tentative approval of the Director of the department to rehire, the Director must submit the request to Human Resources. Human Resources will review the request and the employee’s personnel file and employment record and approve or deny the rehiring. No rehire may be made without prior review of the personnel file and employment record and concurrence of Human Resources.

4.16 **Political Activities** *(rev. 05/10/11)*

**Policy:** Employment will not be offered as a consideration or reward for political support of any political party or candidate for public office.

**Procedure:** Hiring supervisors may not evaluate or consider political affiliation or support when making a hiring determination.
SPECIAL HIRE

4.17 Acting Positions (rev. 05/10/11)

Policy: GLCAP may appoint a regular employee to an acting position when there is a position opening due to a temporary or permanent vacancy. Employees filling an acting position will maintain their current benefits. Generally, the appointment to an acting position will not exceed 6 months. However, extensions to this time limit may be made on a case-by-case basis in consideration of business need with approval by the President/CEO or his/her designee.

Procedure: The hiring supervisor must submit to the Director a request to appoint an employee to an acting position. No appointment may be made without prior approval from the Director. When approval is granted, the hiring supervisor may fill the position for up to 6 months, or the end of the temporary vacancy, whichever is shorter.

The selection process to fill a permanently vacated position with a regular appointment may commence any time after the position is vacated, but should be planned to conclude the search and make a regular appointment no later than 6 months after the date that the acting employee commenced in the acting position. When a regular appointment cannot be feasibly made within the 6 month timeframe, the Supervisor may submit a request to extend the acting position to the Director. Such request shall include the name and regular position of the acting employee, date of original appointment to the acting position, requested duration of the extension, reason for the extension, projected costs or cost savings, and all other relevant information. The Director will review the request and, if determined necessary, will request an extension from the President/CEO or designee.

If the acting position was a result of a temporary vacancy, the acting position will cease upon return of the regular employee from leave. The supervisor will contact the regular employee, whose absence created the need for an acting position, 30 days prior to the planned return-to-work date to confirm the date of return. If the supervisor does not receive notice of the employee’s return to work, the position will be considered to have been permanently vacated, and the recruitment and hiring process for a regular employee can begin. The position may not be filled with a regular employee until the approved leave has expired and the employee on leave has not returned to work.

4.18 Temporary Positions (rev. 03/08/16)

Policy: GLCAP may hire a temporary employee when there is a need for additional staff to complete a special project, to substitute for employees on approved leave, or when workloads exceed the ability of staff to accomplish the work in a timely and efficient manner. An employee in a temporary position does not receive benefits. Approval to create a temporary position or hire a temporary employee to fill a current position must be granted by the Director in consideration of workload, budgetary and other business needs.

A temporary employee may be hired to fill a position for a time period not to exceed 6 months. Extensions to this time period must be approved by the President/CEO or his/her designee. If approval is granted to make the temporary position a regular position, the normal hiring process must be followed.
4.18 Temporary Positions (continued)

Procedure: A supervisor who determines business need for a temporary position shall submit a request to create a temporary position, or to hire a temporary employee into a current position. The request shall include the anticipated duration of the appointment, business and workload need, projected costs, and all other relevant information. The request will be considered by the Director who maintains the authority to approve or deny the creation of the temporary position.

If the position is approved, the hiring supervisor shall make the appointment to the position. The temporary position will continue for the approved duration or for a lesser period if the temporary position is no longer needed.

Thirty days prior to the date the temporary position expires, the supervisor shall re-evaluate the continued need for the position, and if the supervisor believes that the temporary position should be extended due to continued business and workload need or the temporary position needs classified as a regular position, the supervisor shall submit a request to the Director.

The Director will review the request, and if determined necessary, will submit a request to the President/CEO when the extension of a temporary position exceeds 6 months or to make the temporary position a regular position. If approval is granted for a regular position, the hiring supervisor may begin the hiring process.

Employees who fill positions on a temporary basis shall receive a conditional offer letter that explains the position is of a temporary nature.

4.19 Employment References (rev. 05/10/11)

Policy: Only Human Resources is authorized to provide employment references on former and current employees. No other employee is authorized to provide job reference information or verify the employment of any person. GLCAP will not give any recommendation to hire or not to hire any former employee, but shall leave that decision to the entity requesting the information based on the information it gathers through its own selection processes.

Procedure: Supervisors or other employees who receive verbal or written reference requests shall forward the request immediately to Human Resources.

Employees are expected to be cognizant that a calling party may attempt to engage the employee in casual conversations about a current or former co-worker. Employees are expected to recognize these situations and to forward these calls to Human Resources without making positive or negative comment or any reference about the employee or former employee.

Upon receipt of a request for reference, Human Resources will require the employer requesting the reference to submit an authorization signed by the former or current employee granting GLCAP permission to release the information. The written statement must include a statement that releases GLCAP from any and all liability related to the release of the reference information.

When references are given by Human Resources, they will be limited to factual and documentable information about the employee’s work record and service with GLCAP. References shall not contain any confidential information, or information that cannot be substantiated by personnel or other records and documentation. In addition, Human Resources will not give personal opinions that cannot be substantiated, or any information directly or indirectly related to the employee’s or former employee’s race, color, citizenship status, national origin, ancestry, gender, sexual orientation, age, religion, creed, qualified mental or physical disability, marital status, veteran status, political affiliation, military status, employee and family genetic information, height, weight, or any other personal or non-job related characteristic.
SECTION 5
EMPLOYMENT GUIDELINES

5.1 Parking

Policy: Parking guidelines shall be established according to the needs of each GLCAP site in order to accommodate participants and/or respect the wishes of the property owner. Employees are expected to abide by the parking guidelines established for the job site.

Employees assume sole responsibility for items left in their personal vehicle while the employee is parked in GLCAP designated parking, or while working off site on behalf of GLCAP. GLCAP shall assume no responsibility for any damage to, or theft of any vehicle or personal property left in the vehicle while the employee is working.

Procedure: Supervisors are responsible for informing employees of parking guidelines. Employees must park in the designated employee parking area and follow all parking guidelines established for the job site.

Personal belongings left in the employee’s car while the employee is working, are left at the employee’s own risk. Employees are encouraged to lock their cars at all times when working or when parking in other locations while on GLCAP business.

5.2 Company Provided Uniforms

Policy: GLCAP provides uniforms for certain positions to foster a professional appearance and as a means of identification of employees who enter participants’ homes. Employees in these positions will receive uniforms following hire. In the event of employee termination, uniforms are to be returned as part of the exit process.

Procedure: For employees who receive uniforms, the following procedures apply:

1. GLCAP will issue uniforms to each new employee as part of new hire assimilation. Employees are required to sign for the uniforms and the uniforms are considered company property and are to be returned in the event of termination.

2. With respect to cleaning and mending, employees are expected to follow their specific department’s procedure.

In the event of employee termination, uniforms are to be returned as part of the exit process. If they are not returned, GLCAP will deduct the cost of the uniforms from final pay due the employee (except where prohibited by state law).
5.3 **Dress Code/Personal Appearance**

**Policy:** GLCAP is proud of the work and services that it provides, and believes it is important for employees to portray competency and professionalism, in part through appropriate dress and grooming. Accordingly, GLCAP reserves the right to prescribe reasonable dress and grooming standards for all employees. “Dress For Your Day.” In general, employees can choose the attire that fits their schedule and appropriate to the requirements of their job. Employee clothing shall be neat, clean and in good repair (no holes, tears, or frays), and personal grooming shall be in accordance with generally accepted health and hygiene practices. Likewise, while clothing should be appropriate for the employee’s job, an employee’s attire is expected to convey a professional appearance when meeting internally or externally with partners, vendors, etc.

Attire shall not be revealing, and may not include shirts or attire that promote alcohol, drugs, harassment of any group, or is otherwise contrary to these policies and the interests and philosophy of GLCAP. Refer to the procedure for examples of appropriate and inappropriate attire.

Although GLCAP recognizes the personal rights of employees to wear body-piercing jewelry and to exhibit tattoos during non-working hours, during working hours, GLCAP reserves the right to prescribe reasonable and appropriate standards pertaining to body piercing, jewelry and tattoos. Piercings that are visible to others during work time shall be limited to conservative earrings on one or both ears. Likewise, tattoos which are visible while working shall not be excessive or extreme, or conflict with the philosophy and policy of GLCAP, or impact negatively on its reputation. In no case may a tattoo expound any form of sexual, racial or other form of harassment or disrespect against any person or group.

**Procedure:** Employees who have concerns regarding violations of this policy should contact human resources. Human resources will determine appropriate action. Supervisors are responsible for monitoring to ensure the dress code/personal appearance standards are being met. If standards are not being met, Supervisors must contact human resources for review and resolution.

Employees who are not in compliance will be required to go home to change clothing or otherwise comply with this policy and may also be subject to appropriate disciplinary action, up to and including discharge from employment.

GLCAP will make reasonable efforts to accommodate persons when dress code policies conflict with an employee’s observance of bona-fide religious practices, insofar as such accommodation does not impact upon the safety of the employee, coworkers, or general public, or otherwise create an undue hardship on GLCAP. Employees must contact Human Resources if they feel an accommodation is needed.
5.3 **Dress Code/Personal Appearance (continued)**

Examples of appropriate and inappropriate attire include, but is not limited to the following:

<table>
<thead>
<tr>
<th>Appropriate</th>
<th>Inappropriate</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Polo-style shirts, Shirts with collars (small logo on pocket or sleeve area for example is allowable)</td>
<td>• T-shirts and sweatshirts</td>
</tr>
<tr>
<td>• Modest neck line shirts, tops, sweaters, blouses</td>
<td>• Spaghetti strap shirts, crop tops, tube tops</td>
</tr>
<tr>
<td>• Suit Jackets, Blazers, Sports coats</td>
<td>• Shorts</td>
</tr>
<tr>
<td>• Khaki-style pants</td>
<td>• Sweatpants, Yoga Pants, or similar casual wear</td>
</tr>
<tr>
<td>• Casual slacks, capris</td>
<td>• Pajamas</td>
</tr>
<tr>
<td>• Belts</td>
<td>• Leather/vinyl clothing other than jackets/coats</td>
</tr>
<tr>
<td>• Dresses or skirts 2 inches above the knee or longer</td>
<td>• Skirts or dresses shorter than 2 inches above the knee</td>
</tr>
<tr>
<td>• Loafers, flats, heels, dress shoes, sandals, boots</td>
<td>• Hats</td>
</tr>
<tr>
<td>• Solid color leggings worn under a dress or skirt</td>
<td>• Athletic Shoes or similar type shoes</td>
</tr>
<tr>
<td>• Solid color leggings worn with a mid-thigh length sweater or shirt</td>
<td>• Flip flops, crocs, sliders, or similar type shoes</td>
</tr>
<tr>
<td>• Solid colored denim in good repair (no holes, tears, or frays)</td>
<td>• Clothing that is revealing and/or exposes bare backs, midriff, cleavage, undergarments</td>
</tr>
<tr>
<td>• GLCAP or department logo apparel</td>
<td>• Shirts or other attire that promote alcohol, illegal drugs, harassment of any group, or other subjects contrary to these policies, or the interests and philosophy of GLCAP</td>
</tr>
<tr>
<td>• Hats only for positions that work in outdoor weather conditions or require a head covering such as Food Service</td>
<td>• Any casual wear with large printed logos, sayings, pictures etc. that advertise private interests</td>
</tr>
<tr>
<td>• Athletic shoes only for classroom, kitchen, meal delivery/van driver, maintenance, in-home repair staff and for staff who have a medical necessity as determined by a physician</td>
<td></td>
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</tbody>
</table>
5.4 **Business/Working Hours**

**Policy:** Business working hours are established by the supervisor of each GLCAP job site based on the needs of the program. Changes to business working hours must be approved by the Director. Individual work schedules shall also be established by the supervisor, in consideration of business need, normal working hours, and other business factors.

Employee work schedules can change at any time, and not necessarily with prior notice, therefore work schedules that are announced or are long-standing do not create any precedent or guarantee of certain work hours or days. Likewise, based on business and workload need, an employee may be required to work hours outside of the employee’s regular schedule.

**Procedure:** The supervisor of the job site must submit a written request to the Director for approval to change a site’s business working hours.

Employees will be given a work schedule by their supervisor and the employee will normally be notified as soon as feasible if and when a work schedule changes. In urgent situations, when business needs dictate, or for other reasons, employee work schedules can be changed without prior notice.

Exempt employees can work over and above their established work schedule as needed to fulfill job responsibilities. Non-exempt employees must receive prior authorization to work beyond their scheduled hours.

5.5 **Attendance**

**Policy:** GLCAP considers regular and predictable attendance to be an essential function of every job. Therefore, through their employment with GLCAP, each employee has an inherent personal responsibility to arrive to work on time each scheduled workday and to leave no earlier than the appointed time. GLCAP recognizes that circumstances may require an employee to arrive late or leave early and leaves are provided for this purpose. Abuse of any leave provided by GLCAP is specifically prohibited.

If unable to work scheduled hours, employees are responsible for notifying their supervisor in accordance with request procedures specified by the type of leave requested. Failure of a non-exempt employee to comply with this policy will result in loss of pay for the time missed. Exempt employees may be subject to loss of pay for time missed, in accordance with FLSA requirements. In addition to loss of pay, a non-exempt or exempt employee may be subject to appropriate disciplinary action, up to and including discharge from employment.

Unreported absences from work or absences without approved leave shall result in loss of pay and disciplinary action up to and including termination.

**Procedure:** The Director shall establish call-in procedures appropriate for each location. When establishing call-in procedures the Director will consider whether coverage for the position is needed, the amount of time needed to find coverage, and travel time prior to beginning off-site production. The Director shall submit written procedures to Human Resources for review and approval. Call-in procedures will be distributed to employees and posted at each site in employee areas.
5.5 Attendance (continued)

If an employee anticipates being tardy in arriving to work, the employee is expected to notify the employee’s supervisor as soon as feasible prior to the time that the employee is expected to work, or if that is not feasible due to an emergency situation, as soon as possible after the scheduled starting time. An employee who notifies their supervisor of late arrival may be asked not to report to work if covering the tardy results in calling in another employee, waiting for the late arrival will delay off-site production, or the tardiness will result in delayed transportation for participants. Employees approved to arrive to work late are expected to notify their supervisor of their arrival immediately upon arriving to work.

Non-exempt employees will be deducted in pay when the employee arrives to work late in accordance with the pay deduction and rounding rules specified by payroll policy. Excessive absences or tardiness or a noticeable pattern of tardiness or absenteeism will be brought to the employee’s attention by the employee’s supervisor and may also result in appropriate disciplinary action, up to and including discharge from employment.

Exempt employees will not be deducted in pay in partial day increments when the employee arrives late to work, however, the pay of exempt employees may be deducted in whole day increments when the employee does not report off, and performs no work the entire day. Notwithstanding, exempt employees are responsible to follow attendance and tardiness policies. Therefore, excessive absences or tardiness, or a noticeable pattern of tardiness or absenteeism will be brought to the employee’s attention by their supervisor and may result in disciplinary action.

Employees are to use leave only for reasons that the leave is intended, and are required to report absences to their supervisor each day that the employee is unable to work scheduled hours. Reporting procedures included in leave policies shall be followed.

Records of discipline for attendance and tardiness will be retained in the employee’s personnel file and will be a consideration for eligibility for promotions, determining layoffs, or other personnel actions.

5.6 Lunch Period

**Policy:** An unpaid lunch period of ½ hour to 1 hour is established by the Director according to program needs. The time when lunch periods are scheduled varies, and meal break times are subject to the approval of the employee’s supervisor based on workload demands, available staffing and other business factors. Consideration may be given to individual employee preferences as feasible and when the requested time does not unduly conflict with business needs.

Meal breaks are a benefit of employment and not an entitlement. Accordingly, an employee may be required to work through lunch to meet staffing, workload or other business needs. Non-exempt employees who are required to work through their meal break will be compensated for the time in accordance with FLSA requirements.

**Procedure:** The Director of the department maintains authority to schedule lunch period times, which may be changed based on business needs. Consideration can be given to requests to take lunch at a particular time to attend to personal matters, but such requests are subject to the approval of the employee’s supervisor, with business need taking priority over personal preference.
5.6 **Lunch Period (continued)**

Normally meal periods are uninterrupted by call to duty, however, on occasion employees may be required to cut their meal period short to fulfill job responsibilities. FLSA exempt employees may work through all or any portion of their meal periods without prior permission. However, FLSA non-exempt employees must receive permission prior to working any part of the scheduled lunch period. Non-exempt employees who work through any part of the lunch period will be paid for the time worked.

5.7 **Release Time for Nursing Mothers** *(New 05/08/12)*

**Policy:** Nursing mothers will be provided a reasonable amount of break time to express milk for a nursing child for up to 1 year after the child’s birth. An area will be provided for a nursing mother that is shielded from view, free from intrusion from coworkers and the public, and separate from a bathroom.

**Procedure:** Employees who are nursing must notify their supervisor of the need for release time to express milk, the estimated times during a day, and the approximate duration needed. Supervisors will designate an area that is shielded from view, free from intrusion from coworkers and the public, and separate from a bathroom.

5.8 **Agency Closing** *(rev. 03/13/18)*

**Policy:** In the event of severe weather conditions or other emergencies, the following will be observed:

**Weather Closing:**

A weather closing will be issued when unfavorable weather conditions force the supervisor to close the site to participants for all or part of a day. Employees may arrange to work at another site closer to their home with prior approval from their supervisor. Employees who do not report to work during the closing may flex hours with supervisor approval, or use available vacation, personal leave, or unpaid leave.

**Disaster Closing:**

A disaster closing for all or part of a day will be issued due to severe weather conditions or other emergencies declared by GLCAP or local law enforcement agencies. The President/CEO or his/her designee may declare a disaster when a Level 3 emergency is declared in the county in which an employee’s job site and/or home is located.

When a Level 3 emergency is lifted by 10:00 am, GLCAP will resume operations at 12:00 pm. Employees must follow department procedures when operations will resume at 12:00 pm.

Employees will receive disaster pay for the time closed due to disaster.

Employees who work from home as their assigned job site are excluded from disaster pay and are expected to work from home with no travel until a Level 3 emergency is lifted unless weather-related conditions (power outage, etc.) prevent the employee from performing work duties.

Disaster pay will not be substituted or paid if it occurs while an employee is on vacation, personal, sick leave, holiday leave, or any other paid or unpaid leave. GLCAP will pay a maximum of two consecutive disaster days unless otherwise authorized by the President/CEO.
5.8 **Agency Closing (continued)**

**Procedure:**

**Weather Closing**

When an employee is unable to report to work during a weather closing at the employee’s scheduled time, the employee shall notify the supervisor as soon as feasible prior to the scheduled starting time. Supervisor approval is needed to flex hours, or to use vacation, personal, or unpaid leave. Supervisors will notify employees if a weather closing is declared and they are not to report to work.

**Disaster Closing**

Approval to use disaster pay should be requested if the county in which the employee lives or works has declared a Level 3 emergency, or when another emergency specific to the job site occurs. Countywide states of emergencies are broadcast on local TV and radio stations.

5.9 **Telecommuting** *(New 05/12/20)*

**Policy:** In the event of pandemics and other unexpected, extraordinary circumstances, (i.e. the Coronavirus outbreak), the President/CEO has the authority to implement a temporary telecommuting arrangement for employees whose job duties and responsibilities are conducive to working from home but who do not regularly telecommute. These arrangements are intended to be short term. GLCAP will monitor guidance and recommendations from health and other officials and provide updates/changes to work arrangements as needed.

Pandemic events and other unexpected, extraordinary circumstances, may require the full or partial closure of offices/centers, reductions and/or discontinuation of services, staffing adjustments, and staff reassignments. Employees may be asked to perform duties not normally regarded as his/her typical tasks due to the significant nature of such events.

Telecommuting does not alter the focus of the employee on business and customer needs (internal or external customers). During the course of the Pandemic or unexpected, extraordinary circumstances, employees will be assigned the work/tasks that must be completed as necessary to ensure contractual obligations are met. This may equate to their normal, regularly scheduled hours or could involve a reduced schedule.

Whether working in their normally assigned office, an alternate location, or in a telecommuting arrangement, employees will be expected to complete the work as assigned by his/her supervisor, program director, or the President/CEO and abide by the telecommuting policy.

**Procedure:** The President/CEO will monitor guidance and recommendations from health and other officials to evaluate and determine necessary and appropriate changes to work arrangements and communicate changes/updates as needed. Employees will be notified of changes/updates by the President/CEO or his/her designee.
5.10 Position Description

**Policy:** Each position shall be assigned a position description that defines the job duties, qualifications and other requirements for the position. Position descriptions shall be compliant with applicable State and Federal equal employment opportunity laws and all other applicable laws and regulations. Position descriptions are reviewed at least once every three years.

Employees shall sign a copy of their position description to substantiate understanding of job requirements. However, regardless of an employee's job title or requirements specified in the description, employees are required to perform any task or assume any responsibility required by the employee’s supervisor or Director that pertains to GLCAP employment.

**Procedure:** Employees are expected to sign their position description during the new employee orientation and subsequently as the position description is updated. Employees will be given reasonable opportunity to review position requirements and ask questions to confirm understanding of the job duties. Signing the description after reasonable review shall be considered a condition of continued employment. Supervisors are responsible for ensuring that the description is signed and the original signed version is forwarded to Human Resources for retention in the employee’s personnel file.

Human Resources shall maintain an electronic file of all position descriptions and is responsible for keeping position descriptions current. Although Human Resources maintains sole authority to make changes to the approved position description, the position’s supervisor, position incumbent or others with knowledge of the job will normally provide input.

To initiate a change to a position description, the supervisor [or employee in conjunction with the supervisor] will complete a position analysis questionnaire and submit it to Human Resources to conduct the job analysis. Human Resources will assess the job duties and responsibilities specified in the questionnaire and may confer with the employee, supervisor, Director or others to clarify responsibilities. Human Resources will classify the position appropriately using job analysis principles and develop or update the job description. The description will be forwarded to the Director, supervisor and employee for review and further comment. The final position description will be forwarded to the Director for approval, and to the employee for review and signature.

Input from the employee is often considered part of the updating process. However, GLCAP retains its inherent management authority to establish position description requirements based solely on its human resource, business, workload, and service needs.

Changes to position descriptions may or may not justify re-evaluation of the wage rate. When a position description is changed, Human Resources will apply generally accepted job evaluation principles and make a recommendation to the President/CEO, who must approve a wage adjustment prior to it being communicated to the affected employee.

The employee and supervisor will mutually assess the accuracy of the position description at least once every three years and may suggest changes to Human Resources in accordance with these policies and procedures.

Job titles used on position descriptions are official titles and shall be used in all human resource, payroll and other GLCAP business matters.
5.11 **New Hire and Reassignment Evaluations**  
*(rev. 03/08/16)*

**Policy:** During orientation, when reassignment to another job occurs, and for an indefinite period of time thereafter, employees are expected to learn their job and become familiar and know the culture, services and all other aspects about their job. Therefore, on or about the end of the employee’s first 90 calendar days of employment or new job assignment, the supervisor will conduct a performance evaluation.

**Procedure:** Supervisors or designated co-workers are expected to instruct, train, and assist new employees in adapting to their new job. The supervisor will meet with the employee to provide constructive feedback regarding job performance and conduct so the employee develops the knowledge, skills and abilities needed to perform to, or exceed expectations. Supervisors will conduct a written performance evaluation at or near the conclusion of the employee’s first 90 calendar days of employment.

Likewise, supervisors shall conduct an evaluation on employees who were reassigned to a new position.

Both the employee and their supervisor must sign the evaluation and the supervisor shall forward the evaluation to Human Resources. The employee shall receive a copy of the evaluation.

5.12 **Performance Evaluations**  
*(rev. 05/10/11)*

**Policy:** During orientation and for an indefinite period of time thereafter, employees are expected to learn their job, GLCAP services and work culture, and all other aspects about their job to be able to perform up to or exceeding performance standards. Therefore, employees are evaluated on an annual basis, during the month designated by GLCAP for the department. Special evaluations shall also be conducted when there is a change in position or duties and in the case of inadequate performance.

Evaluations shall be completed on the official performance evaluation form, and are to be conducted by the employee’s supervisor.

Evaluations shall be signed by the supervisor and by the employee to acknowledge review. The employee may add appropriate comments in the section provided on the form, but does not have authority to change the evaluation, cross-out or revise comments or to make any other notations or changes. Refusal of the employee to sign the evaluation form does not in any manner diminish that the evaluation is an official document of GLCAP and that it may be the basis of, or considered part of, any employment decision.

If self-evaluations are used as part of the evaluation process, the self-evaluation is to be used for points of discussion and comparison with official ratings only, and shall not be considered an official position of GLCAP regarding the employee’s actual performance and conduct.

**Procedure:** Supervisors are expected to timely conduct an annual performance evaluation with each of their employees to discuss job performance, strategies for improvement, and to develop a professional development plan. Along with the formal evaluations, supervisors are expected to discuss work problems with employees, provide guidance, and informally review performance strengths and areas for improvement with the employee throughout the course of the evaluation period.

Prior to meeting with the employee regarding their annual, 90 day or other performance evaluation, the supervisor shall complete the evaluation form. Evaluation ratings should be supported if feasible by documentation including work records, disciplinary records, letters of commendation or complaint, and other documents. The supervisor shall meet with the employee to constructively review and discuss the evaluation.
5.12 Performance Evaluations (continued)

Notes that document performance which may have been made during the course of the evaluation period may be referred to when the supervisor completes the evaluation form. However, when notes are made, they are considered unofficial, and shall be retained separately from the employee’s personnel file. However, records of commendation or complaints, or other official documents of GLCAP which substantiate an employee’s performance shall be retained in the employee’s personnel file as part of the evaluation.

Following the meeting, the performance evaluation shall be signed by the supervisor and employee. The employee’s signature does not necessarily mean that the employee agrees with the evaluation, only that the evaluation was reviewed with the employee. The employee may mark whether in agreement or disagreement with the evaluation and at the employee’s option, the employee may add comments insofar as they comply with policy. The employee shall be given a copy of the evaluation.

The supervisor shall submit the completed evaluation form for review and approval through the supervisory chain up to the Director. The Director shall submit the approved evaluation form to Human Resources. Evaluations shall be retained in the employee’s personnel file.

5.13 Personnel Files and Records (rev. 03/08/16)

Policy: GLCAP shall keep job-related personal information on each employee and will retain this information in an official personnel file.

Personnel files are used for employment purposes, including information needed to manage GLCAP and its personnel, process payroll, substantiate compliance with applicable laws and regulations, report impersonal statistical information used to complete EEO reports and for any other lawful purposes. Personnel files, and the information and the documents contained within them, are the sole property of GLCAP.

Personnel files are considered to be confidential and shall be released to others only on a business need to know basis, or as otherwise required by lawful authority.

Human Resources shall be responsible for maintaining the accuracy and completeness of personnel files of all employees and for file security. Human Resources shall retain medical documents relevant to an employee in a separate confidential file.

Likewise, I-9 forms and related documentation shall be retained in a file separate from the employee’s personnel file. Medical and I-9 files shall be released to others only on a business need to know basis, or as otherwise required by legal authority.

An employee may submit a request to view the information contained in his or her personnel file at reasonable times during the business day and as mutually agreed to with Human Resources.

Employees may request copies of any or all documents in their file and will be charged current photocopying fees for documents requested. GLCAP assumes no responsibility for release of information that is divulged by the employee to unauthorized persons.
5.13 Personnel Files and Records (continued)

Procedure: Contents of each personnel file shall be retained in an organized, consistent manner, and shall include:

- personal identifying information (such as name, address, and job title)
- completed employment applications and other hiring-related documents
- notices of pay changes
- performance appraisals and information on other employment-related actions (such as training course participation and disciplinary actions) and
- other relevant job-related information or documents found essential by management.

Personnel files shall be maintained in a secure location, with access restricted only to authorized persons. Internal access to personnel files is limited to supervisors and managers on a business need to know basis, including those who are considering an employee for a new position, transfer, disciplinary action or other personnel reasons. GLCAP reserves the right to cooperate with court orders and regulatory agencies, and with law enforcement, public safety, or medical officials who have a valid need to ascertain limited, specific information.

Each employee shares in the responsibility of keeping personnel files current by promptly advising Human Resources of relevant changes including change in name; home address; marital status; telephone number; tax exemptions; beneficiary for life insurance; group medical insurance dependents; persons to be notified in case of emergency; and dependents’ status (including changes due to age, marital status, educational status, and legal proceedings such as adoption or legal guardianship). Supervisors shall notify Human Resources of such changes as soon as they are made aware.

Employees are given the opportunity to review their own personnel file by submitting a request to Human Resources. Requests should be submitted in advance and the review of a personnel file will be scheduled only at reasonable times, during normal office hours. Human Resources will strive to schedule the appointment to occur within three working days of request. However, such scheduling is subject to the reasonable availability of a Human Resource representative and the employee making the request.

Human Resources will accompany the employee during the personnel file review to protect the security of the file and to answer any questions. GLCAP reserves the right to remove certain sensitive information, including but not limited to third-party references, confidential management documents or plans, and items related to ongoing security or criminal investigations.

Upon request, Human Resources will copy and provide to the employee documents retained in the file. The employee will be required to pay the current photocopying fee at the time of receipt.

The employee may include a letter of explanation in the file when the employee believes an explanation is necessary. However, the employee may not change, delete, alter, or remove any document or information in the personnel file, or include defamatory explanations or scurrilous attacks upon any person.
5.14 **Changes in Personnel Files and Records** *(New 03/08/16)*

**Policy:** The following changes to personnel files and records are made upon written request and approval:

1. New hires
2. Terminations
3. Changes in salaries and pay rates
4. Voluntary payroll deductions
5. Changes in income tax withholding status
6. Court-ordered payroll deductions

**Procedure:** New hires, terminations, and changes in salaries or pay rates shall be initiated electronically through Kronos.

Voluntary payroll deductions and changes in income tax withholding status shall be authorized by the individual employee.

Documentation of all changes in personnel data shall be maintained by human resources.

5.15 **Seniority** *(rev. 05/10/11)*

**Policy:** Seniority shall be based on the number of years, months, and days of service completed in a regular full-time, part-time, year round, or seasonal position. Seniority begins accruing on the date of hire. Time spent in a temporary or on-call position does not count toward the accrual of seniority.

If an employee has a break in service that lasts for three months or less, the employee’s seniority date will be adjusted to reflect the period of prior service. Former employees who are rehired but have not worked for GLCAP the last three months will not receive credit for prior service.

**Procedure:** Human Resources maintains responsibility to track and record seniority dates and will provide such information to employees and management upon request.

**LAYOFF**

5.16 **Seasonal Layoff** *(rev. 05/10/11)*

**Policy:** Employees hired into seasonal positions will be laid off at the end of the program season. Seasonal employees retain no right to recall, but those who are laid off may be eligible for recall into the same, similar or different position based on budget, availability of vacant positions, the employee’s job performance and conduct records, and other business factors.

A seasonal employee who is laid off is not compensated for unused sick leave, however, if recalled to work the next program season, unused sick leave may be carried over. Personal leave shall not carry over.

**Procedure:** Human Resources will issue a Layoff Notice to seasonal employees at the end of the season, normally at least one week prior to the effective layoff date, although a shorter notice period or no advance notice may be necessary in some situations.
5.17  **Temporary and Permanent Layoff**  

**Policy:** Due to the nature of GLCAP funding or other business reasons, temporary or permanent layoffs may become necessary. Layoffs may occur due to a lack of funds, lack of work, reorganization, or at the expiration of program grants.

Within the jobs designated by the President/CEO or designee for layoff, GLCAP will determine which employees will be affected. Determination will be made by the Director, in consideration of the individuals’ job performance, records of conduct, disciplinary record, attendance record, job competencies, seniority, job location, grant or other funding sources for the position, and other business factors. Employees are not selected for layoff with consideration to race, color, citizenship status, national origin, ancestry, gender, sexual orientation, age, religion, creed, physical or mental disability, marital status, veteran status, political affiliation, military status, ethnicity, culture, family composition, employee and family genetic information or any other factor protected by law. Although GLCAP maintains the right to lay off employees without prior notice, GLCAP will provide a prior three working day notice to the affected employees when feasible and in the interests of GLCAP. An employee who is designated for layoff will be notified by letter that communicates the date of layoff and other relevant information.

Some layoffs are anticipated to be temporary, and others permanent. GLCAP will notify the affected employees at the time of layoff. However, designation as a temporary layoff does not preclude GLCAP from subsequently determining the need to make the layoff permanent based on current business conditions, funding and other business needs. All layoffs initially designated as temporary will be determined to be permanent if the employee is not offered to be recalled within the three month period that immediately follows the effective date of layoff.

Employees are not paid for accrued but unused sick leave or personal leave at the time of layoff, but are paid for any accrued but unused vacation leave. Leave benefits do not accrue while an employee is on layoff. However, seniority will continue during the period of layoff, in the event that the employee is recalled to work within three months of the effective date of layoff.

An employee who is laid off does not retain rights to reinstatement, but may be eligible to be recalled. GLCAP may at its option request that an employee be recalled to a position from which the employee was laid off. GLCAP maintains sole discretion to determine whether to offer a recall and which employees will be offered recall in consideration of the laid off employee’s job performance with GLCAP, records of conduct, disciplinary record, job competencies, seniority, job location, and other business factors.

GLCAP assumes no responsibility to notify laid off employees of vacancies that occur during the period of layoff and in which the laid off employee may be interested or qualified.

GLCAP reserves the right to reassign an employee to another position to avoid the need or reduce the number of employees designated for layoff. An employee may be assigned to a position only when it is in the interests of GLCAP, the employee meets or exceeds the minimum qualifications of the job, and the minimum rate of pay is equal to or greater than the starting rate of their current position.

If no position of greater pay or responsibility is available, GLCAP may also offer a qualified employee a position of lesser pay and responsibility. Nothing within this policy requires GLCAP to reassign any employee in lieu of layoff unless GLCAP determines it to be in its own best business interests. In accordance with the at-will principle, an employee who is reassigned for the purpose of avoiding the need for layoff has the option to resign rather than accept the alternative position.
5.17 Temporary and Permanent Layoff (continued)

**Procedure:** When the Director determines that a layoff is necessary, the Director shall confer with the President/CEO to assess the need for layoff and plan the layoff process.

Upon approval to proceed, Human Resources will provide a layoff notice to affected employees on or prior to the date of layoff. The layoff notice will specify the effective date of layoff, whether the layoff is anticipated to be temporary or permanent, the reason for the layoff, and other information contained in this policy.

An employee who is laid off is required to turn in all assigned keys, equipment, or any other GLCAP property to the employee’s supervisor on the last day worked or prior as otherwise directed. Likewise, all electronic and hard-copy versions of work products and files are the property of GLCAP and shall be returned. Following receipt of the notice of layoff, the employee is not permitted to remove any work product or file, hard copy or electronic, from GLCAP property, and all proprietary property, including any other GLCAP owned materials shall be returned that were used off of GLCAP property during the course of employment. Depending on the nature of the material and facts and circumstances, failure to return GLCAP files and property may result in disciplinary and/or legal action against the employee.

If GLCAP decides to recall an employee, the employee will be notified by certified mail, sent to the employee’s last known address. An employee who is recalled, but does not report to work on the appointed date without prior approval from the employee’s supervisor will be considered to have voluntarily resigned.

5.18 Voluntary Layoff

**(rev. 05/10/11)**

**Policy:** At the option of GLCAP, a voluntary layoff may be initiated before a permanent layoff occurs. Voluntary layoffs are not a required part of the layoff process, therefore a voluntary layoff will be offered only when it is determined that it is in the best interest of GLCAP.

Voluntary layoffs must be approved by the Director in which the employee is assigned. Approval will be based on the needs of the individual programs and the best interests of GLCAP. If more than one employee volunteers for voluntary layoff, the Director retains authority to select which employees will be approved for voluntary layoff based on work performance records, seniority, attendance, experience, and other job related criteria.

**Procedure:** When conferring with the President/CEO regarding the need to layoff, the Director may recommend a voluntary layoff. Upon approval to proceed by the President/CEO, Human Resources will issue a Voluntary Layoff Request to each potentially affected employee. The Voluntary Layoff Request will include the job title, number of affected positions and the location of the position[s] designated to be abolished.

Each employee will complete and forward the response to the request for voluntary layoff to Human Resources. Human Resources will meet with the Director for review and consideration of approval. Upon written approval of the Director, Human Resources will notify the employee of the decision by completing and submitting the Layoff Notice form.

Employees on voluntary layoff are not eligible to be recalled in the event that a position opening becomes available.
5.19 **Change in Scheduled Hours/Length of Season** *(New 05/10/11)*

**Policy:** Supervisors, with the Director’s approval, may temporarily or permanently increase [or decrease], an employee’s total scheduled work hours in accordance with budget availability and constraints.

Temporary changes will be for a period of 1 to 6 months, and permanent changes are for a period over 6 consecutive months. Temporary schedule changes may become permanent based on business needs, with the Director’s approval. The duration of seasons, and resulting work hours of employees, may also be changed upon approval of the Director.

Supervisors, in collaboration with the Director, will determine which positions and employees will be affected by the hours change based on program needs.

Vacation, personal, and sick leave will accrue based on the number of hours scheduled to work.

**Procedure:** A supervisor who determines that it is necessary to temporarily or permanently increase [or decrease] scheduled hours, shall submit a request through the supervisory chain, for final written approval by the Director.

The Director will notify Human Resources of the decision to increase or decrease work hours by submitting to Human Resources a copy of the approval and written notice.

Employees whose total hours are increased or decreased will receive written notice from Human Resources of the schedule change and if the schedule change is intended to be temporary or permanent. If temporary, the notice shall specify the estimated duration and shall advise the employee that the actual duration may be changed at the discretion of the Director.

5.20 **Regular Employee Holding Two Part Time Jobs Within GLCAP** *(rev. 05/10/11)*

**Policy:** Employees may hold two part-time positions with GLCAP in the same or different departments. However, no employee may hold two positions when the scheduled work hours of each position conflict, when the holding of the second part-time position adversely affects the performance of the employee in the first position, or for any other reason determined not to be in the interest of GLCAP.

In the event that an employee works part-time in two different positions for the same or different departments, supervisors are responsible for coordinating the two schedules to effectively manage and control unnecessary overtime. In the event overtime is worked, the department or program scheduling the overtime will be charged.

Such employee’s eligibility for health insurance shall be based on the total number of hours worked in both part-time positions. Eligibility for other benefits are based on the total number of hours scheduled to work in each position.

**Procedure:** Prior to applying for a second part-time job with GLCAP, an employee working part-time for GLCAP must verify that the hours scheduled to work in each position will not conflict and ensure that job performance in either job will not be affected in any manner. The hiring supervisor of the second part-time job must, prior to hiring the employee, coordinate with the supervisor of the other part-time job and mutually agree to the employee’s regular work schedules. In the event that the supervisors cannot mutually agree to non-conflicting work schedules, the employee will continue to work solely in the first part-time job, or may resign from that position to be hired into the second if offered the job.
5.20 **Regular Employee Holding Two Part Time Jobs Within GLCAP**

In the event that an employee is working two part-time jobs for GLCAP, the supervisors of each position must coordinate any extra hours worked over and above the employee’s regular work schedules to manage and minimize the use of overtime.

Employees working two part-time positions must add a line on their time sheet, select the appropriate title(s) and program code, and record hours worked for each position on the appropriate line.

5.21 **Outside Employment**

**(rev. 05/10/11)**

**Policy:** An employee’s position with GLCAP is considered that employee’s primary job, and it takes precedence over all other employment.

Outside employment and/or independent consulting for any type of compensation or benefit is permitted provided the employee notifies and receives prior approval from the Director. Such outside employment may not:

- interfere with an employee’s ability to effectively perform job duties and responsibilities with GLCAP
- violate GLCAP values or ethics, or conflict in any way with its mission
- present a conflict of interest with employment by GLCAP
- involve performing job duties or services which GLCAP provides
- occur during regular or assigned working hours at GLCAP, or any other hours the employee is expected to work, unless on vacation, personal, or unpaid leave approved by the President/CEO or designee
- be in violation of any policy specified in this manual.

Approval of the activity does not imply GLCAP sponsorship or endorsement of the secondary employer.

GLCAP computer equipment, Internet service, e-mail, printers, fax machine, copiers, all equipment, and all materials and supplies are for GLCAP business use only and may not be used for the conduct of the secondary job, or in any manner on behalf of the secondary employer. Likewise, the secondary job may not be performed during the employee’s paid work time with GLCAP.

**Procedure:** An employee who desires to work an outside job must complete an Outside Employment Request form. Forms can be obtained from supervisors, Human Resources, or the employee website. The employee must submit the request to their supervisor prior to starting work with the secondary employer, who shall approve or disapprove the request. The form will be sent through the supervisory chain until it reaches the Director for final approval or disapproval. The Director submits the request form to Human Resources and sends copies to the supervisor and employee.

In the event that the secondary employment conflicts with this or any other policy, or is anticipated to create a conflict, the supervisor shall advise the employee, and the employee may choose to accept [or continue] employment with the secondary employer, or may resign from [or not accept appointment to] the secondary job to continue employment with GLCAP.

Should the employee decide to accept or continue employment with the secondary job, the employee will be considered to have resigned from GLCAP. Should the employee refuse to resign, the employee may be discharged from employment on the basis of the conflict.
SECTION 6
COMPENSATION

6.1 Wage Schedule

Policy: GLCAP has adopted a compensation program which follows generally accepted job evaluation principles. Jobs are assigned to a compensation schedule that is both internally equitable and externally competitive, but within practical budgetary constraints and the pay philosophy of the Board.

The compensation schedule includes a minimum pay rate for each pay range. Compensation decisions are made based on job-related criteria.

Procedure: Human Resources shall administer the compensation program based on application of generally accepted job analysis and job evaluation principles.

Human Resources shall be the point-of-contact for resolving pay questions and issues ensuring that the compensation program is administered in a non-discriminatory manner, and in accordance with sound pay administration principles and practices.

6.2 Fair Labor Standards Act Compliance

Policy: GLCAP compensation programs and practices shall comply with the Fair Labor Standards Act (FLSA) and other State and Federal wage and hour laws.

Procedure: Human Resources is responsible for assessing the requirements of each position and will apply the FLSA exemption tests to determine exempt status. Position descriptions will reflect actual job requirements and will include job requirements that substantiate exemption status.

Employees will be informed of their exemption status and eligibility for overtime through their review and signing of their respective position descriptions. Employees with questions regarding their exemption status or what is meant by exempt or non-exempt should contact Human Resources.

6.3 Non-Exempt Requirements and Conditions

Policy: Non-exempt employees shall be paid on an hourly basis for all hours worked on behalf of GLCAP and shall receive overtime pay, at 1 1/2 times their regular hourly wage, when working more than 40 hours in the established 168 hour work period, which starts Sunday 12:00 a.m. and extends through the end of the following Saturday.

Only actual hours worked shall be considered in determining overtime pay. Therefore, time spent on approved paid sick leave, holidays, vacation, personal days, and other paid or unpaid leave shall not count toward the calculation of overtime.

Supervisors are expected to effectively manage and control overtime, consistent with the requirements of the FLSA. Supervisors have the right to rearrange an employee’s work schedule, within the same work period in which the employee worked over, to ensure that the employee’s hours during that work period do not exceed forty hours.

Employees will not be compensated for scheduled overtime that is subsequently cancelled.
6.3 **Non-Exempt Requirements and Conditions (continued)**

**Procedure:** Non-exempt employees are expected to arrive and leave work at their scheduled time. All hours worked must be recorded on a timesheet.

Supervisor approval must be received prior to an employee working over 40 hours in the work period or when an employee works hours that exceed or are different from the employee’s normal schedule.

Supervisors are expected to manage all hours worked and approve overtime only for emergencies, occasional operational requirements, or when it will result in a lower overall cost to GLCAP.

6.4 **Exempt Requirements and Conditions** *(rev. 03/08/16)*

**Policy:** Exempt employees are paid on a salary basis. Being paid on a salary basis means an employee regularly receives a pre-determined amount of compensation each pay period.

As allowed under the Fair Labor Standards Act, deductions from pay are permissible when:
- the exempt employee is absent from work for one or more full days for personal reasons (not related to sickness);
- the exempt employee is absent from work for one or more full days due to sickness;
- to offset amounts an employee receives as jury or witness fees, or for military pay;
- unpaid disciplinary suspensions of one or more full days are imposed in good faith for workplace conduct rule infractions;
- the exempt employee does not work the full initial or last week of employment; or
- the exempt employee takes unpaid leave under the Family and Medical Leave Act (partial or full day deductions may be made).

**Procedure:** Complete a timesheet showing time worked. Deductions from accrued vacation and personal leave must be made in full day increments. Deductions from accrued sick leave must be made in hourly increments. Full day absences for personal reasons or sickness will be unpaid after all accrued paid leave has been exhausted.

6.5 **Mandated Payroll Deductions** *(rev. 03/08/16)*

**Policy:** Payroll deductions shall be made in accordance with State, Federal and local laws including but not limited to federal, state, city, and school withholding taxes, Social Security/Medicare (FICA), and other deductions required by law. GLCAP will deduct one local unit of government withholding tax based on the worksite address identified at hire or transfer to a new location. A residence tax deduction can be set up in addition to the worksite tax deduction by submitting a written request to payroll.

Garnishments, child support, tax levies, and other deductions will be made as required by court order, or city, state and federal law.

**Procedure:** Payroll deduction forms are reviewed and completed at new employee orientation. The actual amount to be deducted from an employee’s paycheck will depend on the employee’s earnings and the number of exemptions designated on the W-4 form. Changes to deductions can be made through Accounting.

Payroll deductions for garnishments, child support, tax levies, and other deductions will be made as required by court order, or city, state and federal law.
6.6 **Voluntary Payroll Deductions** *(New 03/08/16)*

**Policy:** GLCAP will make deductions for GLCAP offered benefits, United Way, the Education and Information Fund of GLCAP, and the GLCAP Annual Fundraising Campaign at the request of an employee.

**Procedure:** Payroll deductions will be scheduled for an employee once eligibility requirements are met and an employee enrolls in the GLCAP offered benefits. Deductions may include health, dental, and/or vision insurance premiums, 125 Flexible Benefits Plan contributions, Health Savings Account contributions, Voluntary Life and Accidental Death and Dismemberment Insurance, and 403(b) Tax Sheltered Annuity Plan contributions and loan payments.

Payroll deductions will be scheduled for United Way, the Education and Information Fund of GLCAP, and the GLCAP Annual Fundraising Campaign upon written request from the employee.

6.7 **Improper Payroll Deductions** *(New 03/08/16)*

**Policy:** GLCAP prohibits improper deductions from employee’s pay.

**Procedure:** Employees who believe an improper deduction has been made should contact the Payroll Specialist. Complaints of improper deductions will be promptly investigated. If it is determined that an improper deduction has occurred, the employee will be promptly reimbursed.

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**PAYROLL**

6.8 **Timesheets** *(rev. 03/08/16)*

**Policy:** Each GLCAP employee must accurately record all hours worked and clearly identify compensated absences (vacation, holiday, sick leave, etc.) or unpaid leave time daily using the electronic timesheet. Accounting must receive electronically signed and approved timesheets no later than 12:00 noon on the Monday following the close of each pay period. When the Monday after a pay period is a holiday, timesheets are due at 5:00 p.m. on the Saturday the pay period ends.

Each employee shall complete and electronically sign his own timesheets. Electronically submitting a timesheet is the same as signing the timesheet and acknowledging the accuracy of the time recorded.

Tampering with, altering, or falsifying time records, recording time on another employee's time record or willfully violating any other timesheet policy or procedure is a very serious offense and is strictly prohibited.

**Procedure:** Employees will receive electronic login information from Human Resources.

Employees must complete their timesheet daily. Employees are not permitted to complete their timesheet only at the end of the pay period by estimating the time worked or by trying to remember times worked long after it was worked.

When completing a timesheet, a non-exempt employee is required to record the start and end of the employee’s workday and time taken for uninterrupted meal breaks. Non-exempt employees are not required to record time taken for short informal breaks since such time is paid. Exempt employees are to record only the total hours worked, excluding unpaid meal breaks. Both exempt and non-exempt employees must designate on their timesheet paid and unpaid leave time.
6.8 Timesheets (continued)

Employees subject to the Davis Bacon Act must electronically submit timesheets to the employee’s supervisor at the conclusion of each 168-hour work period.

Employees not subject to the Davis Bacon Act must electronically submit timesheets to the employee’s supervisor at the conclusion of each 336-hour work period.

At the conclusion of the pay period, each employee shall sign his timesheet by submitting the timesheet to their supervisor to attest that the times, days, and hours worked are recorded accurately. Employees must submit completed timesheets to their supervisor the last day worked in a pay period, or as otherwise requested by the supervisor. Supervisors will review the timesheet for completeness and accuracy and will either approve or disapprove. Supervisors will submit the approved timesheets to Accounting for payroll processing.

Timesheets may be disapproved for a variety of reasons, including but not limited to failure of the employee to sign the timesheet by electronic submission, failure of a non-exempt employee to complete all dates and times worked, or for other honest mistakes that can be resolved through consultation with the employee. Timesheets will also be disapproved when a timesheet is falsified. In the event that a timesheet is disapproved due to suspected falsification, the supervisor will promptly confer with Human Resources to discuss the facts and circumstances surrounding the disapproval and will take appropriate steps to clarify or resolve the situation.

A GLCAP employee who is on leave, traveling, or is ill on the day that timesheets are due may complete their timesheet online or may telephone or email timesheet information (actual time worked and the appropriate classifications) to his or her supervisor who would then enter the information into Kronos. Timesheets submitted in this manner shall bear the notation, "Time reported by telephone or email by (employee) to (supervisor)." The timesheet shall be signed by the supervisor by submitting the timesheet. Upon return, the employee must review the timesheet to ensure the timesheet is accurate and notify the Payroll Specialist of any inaccuracies.

6.9 Payroll Schedules

Policy: Employees will be paid promptly and accurately for hours worked in the prior pay period. Payday shall be on Friday for work performed during the previous work period. When a payday is a bank holiday, payday shall be on Thursday for work performed during the previous work period. Payroll advances are not permitted.

Procedure: Timesheets must be received by Accounting no later than 12:00 p.m. on the Monday following the pay period end date. When the Monday after a pay period is a holiday, timesheets are due at 5:00 p.m. on the Saturday the pay period ends. Any timesheet submitted after the deadline may result in a 2-week delay in pay.

Pay stubs will be available through Kronos on the pay date.
6.10 Direct Deposit

Policy: Direct deposit shall be provided so an employee’s pay may be automatically deposited into a financial institution and account of the employee’s choice. All employees are required to participate in direct deposit. Employees may choose to deposit into more than one account at more than one bank.

Procedure: Employees will enroll in direct deposit at new employee orientation. Thereafter, employees are expected to contact Accounting prior to making changes to direct deposit account(s) in order to prevent a delay in pay.

WAGE AND SALARY

6.11 Rate of Pay

Policy: All positions are assigned a minimum rate of pay or starting salary range which is equal to or greater than the State or Federal minimum wage, whichever is greater. Pay levels will not exceed the Executive Level II compensation rate as defined by the Office of Head Start.

GLCAP will conduct wage and salary comparability studies every three years. A position’s rate of pay or starting salary range may be adjusted based on studies, funding source, or law requirements. Employees wages may be adjusted as necessary. Employees changing positions may or may not receive a wage increase. Payments or adjustments will be made if a funding source, law, or regulation requires a change to be retroactive. Only employees who are in a regular position will receive the payment or adjustment. Retroactive payments or adjustments will not be made to individuals who are no longer employed.

Procedure: When a position’s rate of pay changes, the employee’s current wage determines whether they will receive the pay change for the position.

- The employee’s wage may or may not be increased when the position has been placed in a higher range or when the minimum wage or salary range established for the range is increased.
- The employee’s wage will not be decreased when the position has been placed in a lower range, the minimum wage for the position is decreased, or the salary range established is decreased.

When an employee changes positions their wage change will depend on the employee’s current wage and the range or starting salary range of the new position.

For positions in Ranges 1 through 4:
- If an employee is hired into a new regular position in a higher range the increase to the employee’s wage will be the difference between the current positions range and the new position’s range.
- If an employee is hired into a regular position in the same range the employee will not receive a wage increase or have their wage decreased.
- If an employee is hired into a regular position in a lower range the employee will receive the minimum wage of the new range plus the amount of their last annual increase.
6.11 Rate of Pay (continued)

For positions in Ranges 5 through 9:

- If an employee is hired into a new position in a higher range the employee may or may not receive an increase in pay. The salary will be dependent upon the availability funds, internal equity and other pertinent factors.
- If an employee is hired into the same range the employee’s salary will be dependent upon the availability funds, internal equity and other pertinent factors.
- If an employee is hired into a lower range the employee’s salary will be dependent upon the availability funds, internal equity and other pertinent factors.

6.12 Annual Increase

(rev. 03/08/16)

Policy: The Board of Directors will review the feasibility for, and level of, an annual increase for regular employees on an annual basis. Whether annual increases are provided will be determined in consideration of the budget, labor market data and other business factors. When an annual pay increase is approved, the increase will be given in a percentage or figure amount on the effective date approved by the Board of Directors. Pay increases granted to employees may or may not be accompanied by an adjustment to the wage schedule to remain competitive with the labor market.

The granting of an annual pay increase in any one year, nor the amount given, does not create a precedent or practice of annual increases for subsequent years.

When an increase is approved by the Board of Directors, on-call employees [who worked and were paid a minimum of 120 hours in the previous calendar year] will receive the annual increase.

Newly hired regular employees who have successfully completed their first 90 days of employment and who began employment before the annual increase effective date will be eligible to receive the annual increase. Newly hired regular employees who are still on their first 90 days of employment at the time of the annual increase will receive the increase upon conclusion of the employee’s first 90 days of employment, effective the first full pay period that follows completion of the first 90 days of employment.

Newly hired regular employees who begin employment on, or after the date the annual increase becomes effective will be eligible for an increase the following year, provided the Board approves an annual increase that year.

Procedure: Accounting will process annual pay increases in accordance with this policy, with pay increases effective on the pay period designated by the Board of Directors.

Prior to the end of a newly hired employee’s first 90 days of employment, supervisors are expected to follow the performance evaluation process and submit the evaluation to Human Resources. Upon submission of an evaluation that substantiates acceptable job performance and conduct, the employee will receive the annual increase, provided the employee continues to be employed with GLCAP prior to the date that the annual increase becomes effective.
SECTION 7
BENEFITS

Health and Welfare

7.1 Insurance Coverage

Policy: GLCAP provides health and welfare benefits to eligible employees. Health and welfare insurance plans shall comply with federal and state health care laws and regulations. Terms and conditions of benefits and insurance policies are determined by Senior Management in consultation with the Board of Directors, who reserves the right to determine and change insurance carriers, to change plans, and to determine whether to offer or limit insurance coverage. Management and the Board of Directors review the plans, cost-sharing between GLCAP and the employee, and other terms at least annually, but also reserves the right to change plans, payment schedules, cost-sharing, and terms as necessary at any time.

Insurance Plans: Current plans offered by GLCAP include:

- Major Medical
- Prescription Drug
- Dental
- Vision
- Life/Accidental Death and Dismemberment (AD&D)
- Long Term Disability

Procedure:

Eligibility: Employees are eligible to participate in the GLCAP group insurance plans based on the following criteria.

- An employee is eligible for Major Medical, Prescription, Dental, Vision, and Life/AD&D benefits when the employee works in a regular year-round or regular seasonal position and works a minimum of 30 hours per week. An employee is eligible for Long Term Disability benefits when the employee works in a regular year-round or regular seasonal position and works a minimum of 40 hours per week.

Enrollment/Changes: Prior to enrollment, a summary plan document, information on available plan options and costs of coverage are provided to eligible employees. Enrollment must occur within 31 days of hire to be effective the first day of employment or the first of the following month. Employees who do not enroll within 31 days must wait until Open Enrollment to elect coverage. Life/AD&D and Long Term Disability are provided to all eligible employees at the start of employment regardless of the employee’s decision to enroll in the other described benefits.

Employees returning from a layoff must work 5 consecutive days before they are eligible for reinstatement of benefits and must enroll within 31 days of their return date by submitting a life change event request through Kronos to Human Resources. Employees who do not enroll within 31 days of returning from layoff must wait until Open Enrollment to elect coverage.

Employees electing coverage are responsible for paying a portion of the insurance premiums upon enrollment. The cost for benefits will automatically be deducted from their pay. GLCAP contributions toward employee benefits are based on availability of funds and approval from the Board of Directors.

Employees may contact Human Resources at any time to elect coverage due to a loss of coverage under another plan, drop or add individuals from their plan due to a change in family status or other qualifying event (i.e. loss of coverage, change in marital status, birth/adoption).
7.1 **Insurance Coverage (continued)**

Employees who change their election due to a qualifying event must submit a life change event request through Kronos and provide appropriate documentation substantiating the qualifying event to Human Resources within 31 days from the date of the event. Employees who do not enroll within 31 days from the date of the event must wait until Open Enrollment to elect changes in coverage.

**Coverage During Leave/Layoff:** GLCAP will continue to pay the GLCAP share of the premium of benefits for employees on leave/layoff as specified below:

- Employees on a seasonal layoff for 2 weeks or less, (i.e., Spring, Winter, etc.) will maintain benefits.
- Employees will maintain benefits while on an approved Family Medical Leave when the employee has been employed with GLCAP for the past 12 months.
- Benefits will be maintained while on an approved non-FMLA paid leave of absence.
- GLCAP will continue to pay for Life/AD&D and Long Term Disability Benefits for employees on a seasonal layoff of more than 2 weeks (i.e. summer).

If an employee is suspended from employment, GLCAP will continue to pay the GLCAP share of the premium of employee benefits for the employee for 30 days provided the employee has been with GLCAP for the previous 12 months. The employee is responsible for paying their share of the premium during this time.

If an employee is involved in a work-related injury that does not allow the employee to immediately return to work and the employee is not eligible for Family Medical Leave, the employee will maintain GLCAP benefits for up to 90 days.

It is the employee’s responsibility to continue to pay their share of the premiums for benefits while on a leave of absence or seasonal layoff of 2 weeks or less.

**Insurance Termination:** Medical, prescription, dental, and vision benefits remain effective through the last day of the month the employee becomes ineligible (i.e. termination, layoff longer than 2 weeks, unpaid leaves of absence). Life/AD&D and Long Term Disability benefits will end on the date the employee is no longer actively at work or as described in the Summary Plan Description (SPD).

In accordance with the Consolidated Omnibus Budget Reconciliation Act [COBRA], in the event of termination of employment with GLCAP, or loss of eligibility to remain covered under our group health plan, employees and their eligible dependents may have the right to continued coverage under the GLCAP health insurance program for a limited period of time at the employee’s own expense. Human Resources will send COBRA information to the separated employee. Employees who elect to continue coverage for medical, prescription, dental, and vision under COBRA are responsible for returning the COBRA election form and submitting premium payments within the required timeframe. Failure to return the COBRA election form and make premium payments will because for discontinuation of medical coverage under the GLCAP group plan.

Employees may elect to continue their Life/AD&D benefits in the event of termination of employment or loss of eligibility. Continuation information will be provided by Human Resources. Refer to the Life and Accidental Death and Dismemberment Summary Plan Description (SPD) for details.
7.2 **Voluntary Life Insurance**

*Policy:* Employees who are scheduled to work 17.5 hours or more a week in a regular position are eligible to purchase voluntary life insurance through payroll deduction.

*Procedure:* Human Resources will notify employees of eligibility. Employees may enroll or waive the voluntary benefit. Details of the benefit are described in the benefit booklet.

7.3 **125 Flexible Benefits Plan**

*Policy:* GLCAP offers a 125 Flexible Benefits Plan that enables employees to pay premiums for health benefits on a pretax basis (Premium Only), and to pay for qualifying out-of-pocket health care expenses on a pre-tax basis (Health Care Spending Account or Limited Purpose Health Care Spending Account).

Provided there are sufficient funds available, GLCAP may contribute funds to the accounts of employees who enroll in the Health Care or Limited Purpose Health Care Spending Accounts. Employees can only enroll in one of the Health Care Spending Account options and must enroll during open enrollment to receive GLCAP contribution.

*Procedure:* Each year during open enrollment employees must indicate if they wish to enroll in the plan or waive participation in the plan within the timeframe established. Enrollment in plan options is determined by the following:

**Premium Only**

Employees making contributions towards their health benefits will automatically begin participating in the Premium Only portion of the 125 Flexible Benefits Plan when health benefits begin.

**Health Care Spending Account**

Employees in a regular year-round or regular seasonal position, works a minimum of 30 hours per week and do not elect the High Deductible Health Plan are eligible to participate in the Health Care Spending Account portion of the 125 Flexible Benefits Plan. The health care spending account can be used for eligible medical, prescription, dental and vision expenses

**Limited Purpose Health Care Spending Account**

Employees in a regular year-round or regular seasonal position, works a minimum of 30 hours per week, and enroll in the High Deductible Health Plan are eligible to participate in the Limited Purpose Health Care Spending Account. A limited purpose health care spending account can be used for dental and vision expenses only.

Employees have the option of enrolling in the appropriate Health Care Spending Account annually during open enrollment. Employees determine their deduction based on anticipated expenses that qualify under this plan.
7.4 Health Savings Account

Policy: GLCAP offers a health savings account that enables employees who enroll in the GLCAP offered High Deductible Health Plan to pay for qualifying out-of-pocket health care expenses on a pre-tax basis.

Provided there are sufficient funds available, GLCAP may contribute funds to the accounts of employees who enroll in the health savings account.

Procedure: Employees may enroll in the health savings account when enrolling in the GLCAP High Deductible Health Plan. Annually, GLCAP will determine the amount and timing of GLCAP contributions.

7.5 HIPAA – Protected Health Information

Policy: GLCAP sponsors health and welfare plans that are subject to the Health Insurance Portability and Accountability Act (HIPAA). GLCAP will not use or disclose protected health information (PHI) for employment related actions and decisions or in connection with other benefit plans.

Procedure: The Human Resource Director shall be designated as the Privacy Officer who will ensure that the following standards are met.

- The release of PHI will be limited to employees and outside parties authorized by the Privacy Officer and as limited by law.
- Verification procedures will be followed to ensure that the individual requesting the PHI is authorized to receive the information.
- The Privacy Officer will be responsible for maintaining PHI records and ensuring that effective systems are in place such as locked cabinets, files are marked “Confidential PHI”, signed releases are received and maintained as required, and that inadvertent disclosure of PHI does not occur.

All requests for information must be referred to the Privacy Officer. For purposes of compliance, PHI refers to individually identifiable health information received by GLCAP group health plan and created or received by a healthcare provider, health plan or healthcare clearinghouse that relates to the past, present or future health of an individual; the provision of health care to an individual; or the past, present or future payment for the provision of health care.

This information includes health status, medical condition, claims experience, receipt of health care, medical history, genetic information, and evidence of insurability and disability.

PHI does not refer to health information received for worker’s compensation, short-term disability, long-term disability, medical information received based upon the American with Disabilities Act (ADA), medical information received based upon the Family Medical Leave Act (FMLA), or pre-employment physicals.

If needed, the Privacy Officer will initiate requests for additional information from healthcare providers for sick leave (including FMLA), disability leave, pregnancy leave or for a reasonable accommodation. The Privacy Officer will have the employee sign a release authorizing the disclosure of information in accordance with HIPAA and the Genetic Information Nondiscrimination Act of 2008 (GINA).
**403(b) Tax Sheltered Annuity Plan** (rev. 03/08/16)

**Policy:** GLCAP offers a 403(b) Tax Sheltered Annuity Plan that enables employees to save for retirement. Contributions to the plan are made through payroll deduction. All deductions are income tax deferred.

GLCAP will contribute to this plan for eligible employees as long as funds are approved by the Board of Directors. The Board of Directors may adjust the GLCAP contribution amount as necessary.

**Procedure:** Employees are eligible to elect salary deferrals from their pay upon hire. Regular employees are eligible for GLCAP match and non-elective contribution following 1000 hours and 1 year of service. Employees who do not meet the 1000 hour service requirement will not receive GLCAP match and non-elective contribution. Eligibility will be reviewed annually on a calendar year basis for employees who did not meet the initial service hours requirement. Human Resources will notify employees of eligibility for GLCAP contributions and date and time of enrollment. Employees will be required to attend a meeting to enroll in the 403(b) Tax Sheltered Annuity Plan. During this meeting the 403(b) Tax Sheltered Annuity Plan will be explained in detail and a summary plan description will be provided. Details of the GLCAP 403(b) Tax Sheltered Annuity Plan are described in the Summary Plan Description (SPD).

**GOVERNMENT REQUIRED COVERAGE**

**Worker's Compensation** (rev. 04/03/17)

**Policy:** All employees are covered by Worker’s Compensation benefits. This work injury and illness insurance is paid for by GLCAP.

For the purpose of this policy, an on-the-job injury shall be defined as an accidental injury suffered in the course of work, or an illness which is directly related to performing assigned job duties. If an employee cannot work due to a work-related injury or illness, and a transitional position is not available, Workers’ Compensation insurance may provide income until the employee can return to work or be placed in a transitional position. In addition, this insurance provides medical expense reimbursement incurred by the injured worker.

**Procedure:** Employees are required to report accidents or injuries that occur while on duty to their supervisor immediately or, if not possible, within 24 hours of the accident. Reporting the incident promptly is important so benefits to which the employee may be entitled are not delayed.

Employees who are injured on the job and require medical attention must go to the nearest approved medical facility for treatment within 2 hours of the injury.

Post-accident drug and alcohol testing is required when there is a reasonable possibility that drug or alcohol use by the employee may be a contributing factor. Failure to comply may result in a lack of benefit coverage and possible disciplinary action (See Drug and Alcohol Testing policy in Standards of Conduct section for more information).

The injured employee and supervisor are required to complete the Work Related Injury Information Packet completely and accurately. Completed forms must be forwarded to Human Resources within 24 hours of the accident. Failure to comply with this policy may result in a denial of the claim for compensation.
7.7 **Worker's Compensation (continued)**

Human Resources is responsible for managing worker’s compensation claims. Human Resources will maintain contact with the injured employee, supervisor, Worker’s Compensation insurer, physicians, hospitals, and others as it relates to the claim of injury. Human Resources will maintain documents from the injured employee, physician, hospital, or the Workers' Compensation insurer.

Employees returning to work after being absent due to a work-related injury must report to their supervisor prior to beginning work and must bring a doctor’s release to return to work.

An employee on Worker’s Compensation is responsible for advising his or her supervisor, in writing, of the employee’s expected date of return, if known. The employee must update the supervisor when absent due to a work-related injury or illness. Human Resources shall keep the supervisor apprised of the date that an employee is expected to return and updates related to work restrictions. Supervisors must forward documents from the injured employee, physician, hospital, the Workers' Compensation insurer, or other related information to Human Resources.

While eligibility is being determined by the Worker’s Compensation insurer, an employee may elect to use accrued but unused paid time. If an employee elects to use paid time, a wage continuation agreement must be signed indicating the dates of use and acknowledging the use is voluntary. Human Resources will prepare a wage continuation agreement for the employee’s review and signature. Requests to use leave shall be submitted in accordance with the leave policy and procedure. If an employee elects to use paid time, the employee is not permitted to receive payment simultaneously with Worker’s Compensation benefits.

7.8 **Unemployment Compensation** (rev. 03/08/16)

**Policy:** GLCAP participates in the State unemployment compensation insurance program by making contributions into the fund based upon GLCAP experience rating and other factors set by State requirements. Unemployment insurance is provided at no cost to the employee.

Unemployment Compensation provides financial assistance to employees who lose their jobs through no fault of their own, are unable to find other employment and who otherwise qualify with eligibility standards set by the State Department of Job and Family Services (DJFS). Unemployment compensation provides weekly compensation to eligible unemployed persons for a designated number of weeks or until such time as they are able to obtain employment.

**Procedure:** Employees who are laid off or separated from service for other than just cause should contact the State DJFS office. Generally, employees who voluntarily resign are not eligible to collect unemployment compensation following their resignation, nor are employees who are collecting sick leave, or are collecting certain Worker’s Compensation benefits. An employee must file for, and be approved by the State Bureau of Unemployment Compensation to receive benefits. Therefore, eligibility is determined by State DJFS and all questions regarding coverage should be directed to that office.

Employees who are collecting unemployment compensation must continue to meet eligibility requirements, including the obligations to actively seek work and to accept available suitable work when offered.
7.9 Social Security/Medicare (FICA)

**Policy:** Employees are required by law to contribute a set amount of their weekly wages to the trust fund from which Social Security and Medicare is paid. GLCAP is required to deduct this amount from each paycheck. In addition, GLCAP matches employee contributions dollar for dollar, thereby paying one-half of the cost of employee Social Security and Medicare benefits.

**Procedure:** Questions regarding current information or specific Social Security or Medicare issues should be directed to the local Social Security Office.

Employees are encouraged to protect their Social Security record by ensuring their name and Social Security number on their pay stub and W-2 form are correct. Employees may also want to make sure their earnings statement is accurate each year by requesting a Personal Earnings and Benefit Estimate Statement from the U.S. Social Security Administration by calling 1-800-772-1213 or online at www.ssa.gov.

7.10 Employee Assistance Program (rev. 03/08/16)

**Policy:** GLCAP offers an Employee Assistance Program (EAP). The EAP provides confidential, professional counseling service on a variety of matters to assist and support the employee in dealing with personal and family issues. The EAP covers legal, family, or financial issues, child care, elder care, relationships, substance abuse or addiction questions and concerns, work-related issues or mental health issues.

**Procedure:** Regular employees and their immediate family members (i.e. spouse, children, and stepchildren) are eligible to participate in this program. Eligible individuals may receive 5 free visits per occurrence (i.e. 5 visits for family issues, another 5 visits for grief counseling).

Information regarding the Employee Assistance Program may be obtained from supervisors or Human Resources. In the event that an employee’s behavior affects their ability to perform their job or their ability to work with others, their supervisor may refer the employee to the EAP. Supervisors must contact Human Resources prior to initiating a mandatory referral to the EAP.

In the event of a mandatory referral, Human Resources will receive information from the EAP counselor/physician regarding an employee’s participation in the program and ability to perform their job and/or work with others. The EAP counselor and/or physician will keep Human Resources informed on the employee’s ability to return to work.
7.11 Holidays

Policy: GLCAP observes the following paid holidays:

<table>
<thead>
<tr>
<th>Holiday</th>
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<th>Holiday</th>
<th></th>
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</thead>
<tbody>
<tr>
<td>New Year’s Day</td>
<td>Independence Day</td>
<td>Friday after Thanksgiving</td>
<td></td>
</tr>
<tr>
<td>Martin Luther King Day</td>
<td>Labor Day</td>
<td>Christmas Eve</td>
<td></td>
</tr>
<tr>
<td>President’s Day</td>
<td>Veteran’s Day</td>
<td>Christmas Day</td>
<td></td>
</tr>
<tr>
<td>Memorial Day</td>
<td>Thanksgiving Day</td>
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</tr>
</tbody>
</table>

In order to meet the needs of our daycare families, it may be necessary for some regular year-round employees working in the Early Childhood Program to work Martin Luther King Day, President’s Day, and the Friday after Thanksgiving. Staffing during holidays will be based on center need per licensing rules. Employees who work a holiday may choose to be paid for the holiday at that time or to flex the holiday between Christmas Eve and New Year’s Day. The employee may flex the holiday during this period as long as the eligibility requirements are met and the holiday was worked in that calendar year.

Procedure: Employees should verify with their supervisor their eligibility for holiday pay. Human Resources prepares a list of holidays and the dates the holidays will be observed annually.

If a non-exempt employee works a holiday and chooses to flex it to a later date, but terminates employment before the holiday is taken, the employee’s supervisor will enter the holiday(s) worked on the employee’s last timesheet, send an email to payroll that includes the name of the employee and state “please pay holiday” on last timesheet, and submit the timesheet to payroll for payment. If an exempt employee works a holiday and chooses to flex it to a later date, then terminates employment before the holiday is taken, the employee will not receive pay for holiday(s) worked.

Employees requesting time off for religious holidays that are not official GLCAP holidays shall follow the leave request procedures specified in this manual. Should an employee feel that s/he has been wrongfully denied a request for time off for religious purposes the employee may file a dispute through the procedure specified in this manual.

Eligibility for Holiday Pay:

- Regular employees scheduled to work a minimum of 20 hours a week will receive holiday pay. Such employees are paid their regular hourly rate or salary, equivalent to the number of hours the employee would normally work on the day that the holiday falls.
- Holiday pay is prorated for part-time employees based on the number of hours scheduled to work per week. Part-time employees are paid for the holiday only if the holiday falls on a day that the employee is normally scheduled to work.
- On-call, temporary, and employees on layoff are not eligible for paid holidays.

In order to qualify for holiday pay, an employee must work the full number of scheduled hours the day before and after the holiday. Only excused, paid absences will be considered exceptions to this policy. If a holiday falls during an employee’s vacation, personal, or sick leave, the employee’s wage for the day will be charged to holiday pay and such time will not be deducted from the employee’s leave balance.

A non-exempt employee who is required to work a holiday will receive holiday pay plus pay for actual time worked or may choose to flex the holiday at a later date, with supervisor approval. Time actually worked on the holiday shall count as hours worked for overtime calculation purposes, however, time compensated as holiday pay does not count.
7.11 **Holidays (continued)**

Exempt employees who work the holiday do not receive extra compensation for working on the holiday but may observe the holiday in the same pay period or within the calendar year.

**Scheduling:** When a holiday occurs on Saturday or Sunday, GLCAP will schedule the holiday based on organizational and program needs. Work hours may be adjusted as needed during holiday weeks to ensure program goals are achieved.

**Religious Holidays:** GLCAP recognizes that important religious observances for some employees occur on days which are not designated as official GLCAP holidays. GLCAP will give deference to employee requests for increments of personal time, vacation time or unpaid leave that enable employees to attend special worship services or observances, or to celebrate a religious holiday.

7.12 **Leaves**

**(rev. 03/08/16)**

**Policy:** Paid and unpaid time off may be granted to eligible employees according to the following leave policies.
- Whenever possible, leave policies will operate concurrently.
- All appropriate accrued paid leave must be used before unpaid leave will be granted.
- Employee benefits will not continue to accumulate during an unpaid leave.

The approval process for the leave will include analyzing GLCAP ability to cover the position for the duration of the leave; the financial implications for the Corporation to allow the leave; and the reason for the leave.

Failure to return to work as scheduled from an approved leave will be considered a voluntary resignation of employment.

**Procedure:** Requests for time off must be submitted according to the following leave policies. Requests for time off will be adjusted if the request will result in payment of hours over an employee’s regularly scheduled hours per week.

7.13 **Vacation Leave**

**(rev. 05/14/19)**

**Policy:** GLCAP provides vacation leave to eligible employees to give the employee time away from the job.

Employees in a regular year-round position, who are scheduled to work a minimum of 20 hours per week, are eligible to accrue vacation. Regular seasonal, temporary, and on-call employees do not accrue vacation.

**Procedure:** Accounting will maintain vacation balances and calculate vacation rates. Vacation balances can be viewed online.

Employees requesting vacation leave shall submit a time off request through Kronos for supervisor approval. The request must be approved prior to the employee using vacation leave. It is the employee’s responsibility to keep their vacation balance within the maximum accrual levels.

Upon termination or when an employee is transferred to a position that is not eligible for vacation leave, the supervisor will send an email to payroll providing the employee’s name and a statement of “please pay all earned vacation leave” on the employee’s last timesheet.
7.13 **Vacation Leave (continued)**

**Accrual:** Vacation begins accruing on the date of hire and can be used upon completion of 6 months initial employment. Vacation leave may only be used once it has been earned. Vacation leave is accrued each pay period based on the tables below.

<table>
<thead>
<tr>
<th>Years of Service</th>
<th>Annual Earned Vacation</th>
<th>Hours Earned Per Pay Period</th>
</tr>
</thead>
<tbody>
<tr>
<td>1-4 years</td>
<td>2 weeks</td>
<td>3.07 hours</td>
</tr>
</tbody>
</table>

Upon the fifth, tenth and thirtieth anniversaries of employment, employees receive an additional week of vacation and will accrue at a higher rate.

<table>
<thead>
<tr>
<th>Years of Service</th>
<th>Annual Earned Vacation</th>
<th>Hours Earned Per Pay Period</th>
</tr>
</thead>
<tbody>
<tr>
<td>5-9 years</td>
<td>3 weeks</td>
<td>4.61 hours</td>
</tr>
<tr>
<td>10-29 years</td>
<td>4 weeks</td>
<td>6.13 hours</td>
</tr>
<tr>
<td>30 years or more</td>
<td>5 weeks</td>
<td>7.67 hours</td>
</tr>
</tbody>
</table>

On-call, seasonal and temporary employees who move into a position eligible for vacation leave will begin accruing vacation the date they hire into the eligible position. The employee will begin accruing vacation at the rate equal to the number of full years (12 months per year) worked in a regular position. The total number of actual months worked is divided by 12 to calculate the number of full years worked. Such employees are able to use accrued vacation leave upon its receipt as long as the employee has been employed by GLCAP for 6 months in a regular position. The 6 months does not have to be consecutive.

**Carryover:** Accrued but unused vacation may be carried over from one year to the next, but the total carryover may not exceed the amount of the employee’s annual earned vacation plus 2 work weeks.

**Increments:** Non-exempt employees may use vacation in 1/4 hour increments. Exempt employees must use vacation in full day increments.

**Requests:** Vacation leave must be requested prior to the leave through Kronos for supervisor approval. Requests should be submitted as far in advance as feasible. Supervisors have the right to schedule vacation leave for employees when there is a work shortage, lack of funds, or for any other management or business situation.

Cancellation, postponement or rescheduling of previously approved vacation leave is subject to the approval of the employee’s supervisor.

**Payment of Vacation Leave:** Employees are paid their regular hourly rate or salary for all time spent on approved vacation leave. Employees are paid vacation only for those days and hours for which the employee is normally scheduled.

**Buyouts:** GLCAP will review the feasibility of offering a vacation buyout on an annual basis. The budget, labor market data and other business factors will be considered when determining the feasibility of offering a vacation buyout.
7.13 Vacation Leave (continued)

If a buyout is determined feasible, employees who have used one half of their annual earned vacation the previous year are eligible to participate. Human Resources will send out a memo annually indicating if a buyout is feasible and if so, the memo will identify the number of hours available for buyout. The granting of a vacation buyout in any one year does not create a precedent.

Upon termination or transfer to a position not eligible for vacation leave, employees who have been employed with GLCAP in a regular position for 6 months will receive a lump sum payment for their vacation leave balance.

7.14 Personal Leave

Policy: Employees in a regular year-round position or regular 6 month duration or more seasonal position, who are scheduled to work a minimum of 20 hours per week, are eligible for paid personal leave. On-call and temporary employees are not eligible for personal leave.

All personal time must be used by the end of the year or season. Unused personal time will not carryover to the next year or season and will not be paid out. Unused personal leave is not paid upon termination.

Procedure: Year-round, full-time employees receive 3 days of personal leave each year. Seasonal employees receive a prorated amount of personal leave based on the number of months scheduled to work in the season. Part-time employees receive a prorated amount of personal leave based on the number of hours scheduled to work per week.

New employees will receive personal time following the successful completion of their initial 90 days of employment; Personal leave will be prorated based on the number of months remaining in the year or season.

Employees in a regular year-round position or a regular seasonal position for at least an 11 month duration will receive their personal leave each year beginning on January 1st. Personal leave not used by December 31st does not carry-over to the next year. Year-round Early Childhood Program employees can use personal leave during the December break.

For employees in a regular seasonal position, the prorated amount of personal leave is added to the employee’s account at the beginning of the season and must be used in full by the end of the season or remaining time is lost. The prorated personal time is rounded to the nearest hour (if non-exempt) or day (if exempt).

Employees in a regular seasonal position, working in school related programs (i.e. Early Childhood Program, New Directions Summer and After School Program, and Senior Food Service Program) that return at the beginning of the season and are not in their initial 90 days of employment, receive an additional 3 days of personal leave. For seasonal, part-time employees in these programs the additional personal leave will be prorated based on the number of hours scheduled to work per week.

The additional personal leave is added following the call back date and must be used in full by the end of the season or remaining time is lost.

Personal leave may be taken to enable the employee to attend to any personal matter that must be addressed during the normal work day. Non-exempt employees may use their personal time in 1/4 hour increments. Exempt employees must use their personal time in full day increments.
7.14 **Personal Leave (continued)**

When an employee wants to take personal leave, the employee shall submit a time off request through Kronos for supervisor approval. An employee may not take personal leave prior to it being approved. Accounting will maintain personal leave balances. Available personal leave hours appear on check stubs.

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7.15 **Sick Leave**

*(rev. 03/08/16)*

**Policy:** GLCAP considers regular and predictable attendance to be an essential job function, but recognizes that employees occasionally get sick or injured. Accordingly, GLCAP offers sick leave for this purpose. Employees in a regular position, who are scheduled to work a minimum of 20 hours per week, are eligible to accrue sick leave. On-call and temporary employees do not accrue sick leave. Accrued sick leave may be carried over from one year to the next, but total accrual may not exceed 720 hours. For part-time employees this amount is prorated based on the employee’s current work schedule. An employee does not accrue sick leave while on unpaid leave.

GLCAP reserves the right to investigate an employee’s absence for any reason. Sick leave may be denied when facts do not substantiate the legitimate use of sick leave.

**Medical Certification:** The President/CEO or designee and/or the respective supervisor may require a doctor’s statement from the employee’s attending physician or medical examination by a doctor chosen by GLCAP for any sick leave taken, regardless of duration, if medical attention was required, there is a pattern of absences, absences are excessive in number, or whenever abuse or neglect is suspected.

GLCAP may disregard a written, signed medical statement when an investigation discloses facts inconsistent with proper use of sick leave.

Failure to submit a required physician’s statement or submitting a false or incomplete statement will result in denial of sick leave. If overpayment results when sick leave is denied, the overpayment will be deducted from the employee’s next paycheck. Likewise, altering a physician’s certificate or submitting a false physician’s certificate is grounds for discharge.

An employee cannot engage in employment anywhere while on leave with GLCAP and cannot engage in any activities inconsistent with his/her leave.

**Return to Work:** A Return to Work Recommendations form must be completed by the treating physician and submitted to the supervisor before allowing the employee to return to the job when the employee has been off work for more than 3 consecutive days due to personal illness or injury.

Unused sick leave is not paid upon termination.

**Procedure:** Accounting will track sick leave balances. Available sick leave hours will appear on check stubs.

When an employee calls in sick, the employee is expected to notify his or her supervisor prior to the employee’s scheduled starting time.

Employees are expected to personally call off and may not typically have someone else report off in place of the employee, except in extreme cases where emergency conditions or serious sickness or injury make it difficult or impossible for the employee to personally call off.
7.15 **Sick Leave (continued)**

An employee must notify his or her supervisor each day that the employee will be absent, unless on approved leave. Failure to notify in accordance with this procedure may result in the denial of sick leave and may subject the employee to appropriate disciplinary action.

Upon return to work, the employee must submit a time off request for sick leave in Kronos for supervisor approval. In the event the employee is unable to personally complete their timesheet due to the absence, supervisors must record the leave and complete the timesheet.

**Accrual Rates:** Regular, full-time employees accrue at a rate of 2.46 hours each pay period. Sick leave will not accumulate on hours employees work beyond their scheduled hours.

Part-time employees accrue a prorated amount of sick leave based on the number of hours scheduled to work. Sick leave will not accumulate on hours employees work beyond their scheduled hours.

Sick leave begins accruing on the date of hire but cannot be used by newly hired employees until after successful completion of their first 90 days of employment.

**Use:** An employee may request sick leave for the following reasons:

1. illness or injury of the employee necessitating absence from work.
2. exposure to contagious disease that could be communicated to and/or jeopardize the health of other employees.
3. illness or injury of a member of an employee’s immediate family that reasonably requires the care and presence of the employee.
4. pregnancy, childbirth and/or related medical conditions. Use of sick leave for childbirth reasons will typically be for 6 weeks duration, except as otherwise determined to be medically necessary as certified by the employee’s attending physician.

Immediate family is defined as mother, father, stepmother, stepfather, spouse, brother, sister, children, stepchildren, guardian, ward, grandparents, grandchildren, or the corresponding relatives of the spouse.

**Increments:** Non-exempt employees may use sick leave in 1/4 hour increments. Exempt employees must use sick leave in hourly increments if they will not meet their scheduled hours in a work week.

**Payment of Sick Leave:** While on sick leave, employees are paid at the same basic hourly, daily, or bi-weekly rate as when they are working. An employee is charged for sick leave only on those days when the employee would have been regularly scheduled to work. Sick leave shall not exceed the amount of time an employee would have been regularly scheduled to work in any pay period.

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7.16 **Time Off Without Pay Leave** *(New 03/08/16)*

**Policy:** Employees who do not qualify for paid leave or have insufficient accrued paid leave may request time off without pay.

**Procedure:** Employees must submit a time off request through Kronos for supervisor approval. Exempt employees requesting time off without pay must do so in full day increments.
7.17 **Family Medical Leave (FMLA)**

**Policy:** GLCAP will not discriminate against employees as a result of the approved use of Family Medical Leave or a proper request for such leave. An employee cannot engage in employment anywhere while on leave with GLCAP and cannot engage in any activities inconsistent with his/her leave.

Eligible employees may be eligible to take family or medical leave if they are unable to come to work due to qualifying family or medical conditions as described within this Family Medical Leave Policy, which shall be administered in accordance with applicable state and federal laws as follows:

- Employees are eligible if they have been actively employed for 12 months, and have worked at least 1250 hours (an average of 25 hours per week) during the previous 12 months.

- The 12 month period calculation “rolls” back, or is measured on the previous 12 months from the date an eligible employee begins Family Medical Leave.

- For the following reasons, employees may request one or more Family Medical Leaves however the total amount of leave taken cannot exceed 12 work weeks in any 12 month period. For part-time employees, the 12 work weeks is prorated based on the number of hours scheduled to work.
  1. The birth of a child of the employee, or placement of a child with the employee for adoption or foster care (must be taken within 12 months of birth or placement).
  2. The employee's own serious health condition.
  3. The serious health condition of the employee's child, spouse, or parent
  4. In the event of a qualifying exigency arising out of the fact that the employee’s spouse, son or daughter or parent is on covered active duty or called to covered act of duty status with the Armed Forces.

- A “Qualifying Exigency” includes the following situations:
  a) Short-notice deployment (7 days or less);
  b) Military events and related activities;
  c) Extraordinary childcare and unusual school activities;
  d) Financial and legal arrangements;
  e) Counseling;
  f) Rest and recuperation of the covered military member;
  g) Post-deployment events;
  h) Additional events which arise out of the covered military member’s active duty or call to active duty status, provided that GLCAP and employee agree that such leave shall qualify as an exigency, and agree to both the timing and duration of such leave.
7.17 **Family Medical Leave (FMLA) (continued)**

- Only for the following reason, employees may request an extended Family Medical Leave of up to 26 weeks. The total amount of leave taken under this reason and including time taken for the above mentioned reasons cannot exceed 26 work weeks in any 12 month period. For part-time employees, the 26 work weeks is prorated based on the number of hours scheduled to work.

  1. To care for an injured or ill servicemember including when the family servicemember is receiving medical treatment, recuperation or therapy, even if the servicemember is on temporary disability retired list.

Exempt and non-exempt employees must use accrued sick leave, vacation leave, and personal leave time during Family Medical Leave (See appropriate leave policy for acceptable use). As allowed under the Fair Labor Standards Act, Family Medical Leave hours taken intermittently or on a reduced schedule will be deducted from exempt employees’ salary. Once accrued paid leave is used the leave will be unpaid. Fringe benefit accruals, such as retirement, sick leave and vacation leave, will continue to accrue during paid leave. Benefits will not accrue during unpaid leave.

Upon return from Family Medical Leave, employees will be reinstated to their position, or an equivalent one, provided that the position has not changed due to business need (i.e. reduction in workforce; decrease in funding, etc.).

While on Family Medical Leave, group health insurance benefits will continue under the same terms as provided to other employees. At the expiration of a Family Medical Leave if an employee is unable to return, the employee will be offered the opportunity to purchase continuing coverage under state and federal COBRA continuation rules.

**Procedure:** Employees expecting to be off work for more than 3 working days for their own serious health condition, a birth or adoption of a child, or for the care of a spouse, child or parent who has a serious health condition must do the following as soon as practicable:

1. Notify their supervisor and Human Resources of their need for Family Medical Leave.
2. Request a Leave of Absence in Kronos. The supervisor must contact Human Resources in the event an employee is unable to submit a request.
3. Submit the doctor’s excuse to Human Resources. The excuse must include the date of which the health condition occurred, the probable duration of the condition, an estimate of the amount of time needed to be off work due to personal illness or to care for a family members health condition, and confirmation that the nature of the condition warrants a need to be away from work.
4. Supervisors will accept or reject the request in Kronos. Supervisors will also complete the FMLA-LOA Questionnaire in Kronos. This should be completed within 24 hours.
5. Human Resources will confirm and notify the employee and their supervisor of leave eligibility. If eligible for Family Medical Leave, the employee will receive a Certification of Health Care Provider form to be completed by the treating physician and returned to Human Resources within 15 days of the request.
6. If the Corporation questions the validity of the certification, the employee may be required to obtain a second opinion from a physician selected and paid for by GLCAP. If the second opinion conflicts with the original opinion, the employee may be required to obtain the opinion of a third health care provider approved jointly by the employee and GLCAP. The third opinion would be at the cost of GLCAP and would be considered binding to both parties. While on leave, the employee will be required to furnish periodic reports of their status and intent to return to work.
7.17 **Family Medical Leave (FMLA) (continued)**

7. Employees off work due to their own serious health condition must provide Human Resources a Return to Work Recommendations form completed by the health care provider prior to returning to work.

Employees expecting to be off work for a covered family member’s active duty or call to active duty in the armed forces must do the following:
1. Notify their supervisor and Human Resources of their need for Family Medical Leave.
2. Request a Leave of Absence in Kronos.
3. Submit a copy of the military orders or other official Armed Forces communication to Human Resources.
4. Supervisors will accept or reject the request in Kronos. Supervisors will also complete the FMLA-LOA Questionnaire in Kronos. This should be completed within 24 hours.
5. Human Resources will confirm and notify the employee and their supervisor of leave eligibility.

Employees expecting to be off work for an injured or ill servicemember must do the following:
1. Notify their supervisor and Human Resources of their need for Family Medical Leave.
2. Request a Leave of Absence in Kronos.
3. Submit a copy of the military medical information, orders for treatment, or other official Armed Forces communication pertaining to the servicemembers injury or illness incurred on active military duty that renders the member medically unfit to perform his or her military duties.
4. Supervisors will accept or reject the request in Kronos. Supervisors will also complete the FMLA-LOA Questionnaire in Kronos. This should be completed within 24 hours.
5. Human Resources will confirm and notify the employee and their supervisor of leave eligibility.

All employees must keep their supervisor and Human Resources informed of their expected return date or any changes in their expected return date regardless of the reason for leave.

**Family Medical Leave Act (FMLA) regulations Definitions:**

- A *child* is defined as a natural, adopted, or foster child, a stepchild, a legal ward or a child of a person standing in loco parentis, who is (A) under 18 years of age; or (B) 18 years of age or older and incapable of self-care because of a mental or physical disability or if the child is over 18, he/she must be unable to care for himself/herself due to a serious health condition.

- A *parent* is defined as the employee’s natural, adoptive, or foster parent, stepparent, or legal guardian.

- A *serious health condition* is defined as a disabling physical or mental illness, injury, impairment, or condition involving 1) inpatient care in a hospital, nursing home, or hospice; or 2) outpatient care requiring continuing treatment or supervision from a health care professional.

- A *covered family member’s active duty or call to active duty in the armed forces* is defined as an employee whose spouse, son, daughter, or parent either has been notified of an impending call or order to active military duty or who is already on active duty.
7.17 **Family Medical Leave (FMLA) (continued)**

- *An injured or ill servicemember* is defined as the spouse, son, daughter, parent, or next-of-kin that was injured or is recovering from an injury suffered while on active military duty and who is unable to perform the duties of the servicemember’s office, grade, rank or rating. Next-of-kin is defined as the closest blood relative of the injured or recovering servicemember.

- A *key employee* is an exempt Family Medical Leave eligible employee who is among the highest paid 10% of all employees. Key employees’ need for Family Medical Leave will be reviewed on a case-by-case basis. Key employees may be excluded from Family Medical Leave rights if it is determined that the leave will cause substantial and grievous economic injury to GLCAP.

7.18 **Leave of Absence** *(rev. 03/08/16)*

**Policy:** GLCAP may grant a leave of absence to an employee who is not eligible for Family Medical Leave, for reasons not qualifying under Family Medical Leave, or for a leave of absence that extends beyond the Family Medical Leave period. All appropriate accrued paid leave must be used before unpaid leave will be granted.

An employee cannot engage in employment anywhere while on leave with GLCAP and cannot engage in any activities inconsistent with his/her leave.

Approval for the leave, including intermittent or reduced schedule leave, will be based on the Corporation’s ability to accommodate the leave. Accommodations that include a change and reduction in duties and work hours may result in a change in the employee’s exempt classification and wages during the leave period. Accrued paid leave cannot be used to supplement the intermittent or reduced schedule. Wages will be based on actual hours worked.

An approved leave of absence may be granted for up to 30 days. If necessary, employees may request extensions in 30 day increments for a maximum of 6 months in a 12-month period.

Requests for a leave of absence beyond 6 months must be approved by the President/CEO or his/her designee. If it is determined that the leave cannot be extended termination from employment may occur.

GLCAP reserves the right to require an independent medical exam by a doctor of its choice when an employee returns from a leave of absence if there is concern regarding the employee’s physical ability to return to the job. Other circumstances, such as an employee’s request for leave extension, or when there is reason to believe that the employee’s condition might pose a safety or health hazard to themselves or to others, may result in the need for an independent medical exam.

**Procedure:** Employees expecting to be off work for more than 3 working days for medical, personal, or other reasons which do not qualify for Family Medical Leave, or who are granted an extended leave of absence beyond the Family Medical Leave period, must request a leave of absence. When foreseeable, employees are required to give a 30 day advance notice. When unforeseeable, notice should be given as soon as possible.

Employees shall request a Leave of Absence in Kronos. Supervisors will accept or reject the request in Kronos within 24 hours. Requests for leave of 5 work days or less must be approved by the Director. The President/CEO or his/her designee must authorize a leave of absence for more than 5 work days and/or intermittent or reduced schedule leaves.
7.18 Leave of Absence (continued)

The request shall provide sufficient detail such as the reason for the leave, the expected duration of the leave, and the relationship of family members, if applicable.

To request a leave of absence for the employee’s own medical condition, documentation from a health care provider is required for approval. The Return to Work Recommendations form must be completed by the health care provider and submitted to Human Resources prior to returning to work.

7.19 Return to Work & Transitional Duty (rev. 03/08/16)

Policy: A Return to Work Recommendations form must be completed and returned when a physician has set limitations on an employee’s ability to perform their job or when an employee is away from work for more than 3 days due to a personal injury or illness. The form must be completed by the treating physician and must be submitted to the supervisor before allowing the employee to return to their job. To be used for work and non-work related injury/illness, this form provides information regarding potential return to work dates and physical capabilities.

In the event that the employee’s physician sets limitations on the employee’s ability to perform their job, GLCAP may provide transitional duties until they can return to their position without limitations. Transitional duty is considered a short-term accommodation. Transitional duty may be granted for up to 30 days. If necessary, employees may request extensions in 30 day increments for a maximum of 6 months. Requests for transitional duty beyond 6 months must be approved by the President/CEO or his/her designee. If it is determined that the transitional duty cannot be extended termination from employment may occur.

Procedure: The Return to Work Recommendations form is to be completed by the treating physician for work and non-work related injury/illness. It should be forwarded to Human Resources after each appointment to determine if accommodations can be made based on the employee’s physical capabilities and department needs. Human Resources will update the employee’s supervisor on the employee’s ability to return to work. A Return to Work Recommendations form completed by the physician must be provided upon return to work.

7.20 Bereavement Leave (rev. 03/08/16)

Policy: Regular employees scheduled to work a minimum of 20 hours a week will receive up to 3 consecutive working days of bereavement leave with pay upon the death of a member of the employee’s immediate family (i.e. mother, father, stepmother, stepfather, spouse, live-in partner, brother, sister, children, stepchildren, guardian, ward, grandparents, grandchildren, or the corresponding relatives of the spouse). For part-time employees bereavement pay is prorated based on the number of hours scheduled to work per week.

Additional leave time, or leave for the death of other relatives or friends, may be granted with supervisor approval. Vacation, personal, or unpaid leave must be used for this purpose.

For employees who are not eligible for paid bereavement leave, the employee may request unpaid time off for the death of an immediate family member. The duration of such leave will normally be no more than 3 consecutive days.

Procedure: Employees must notify their supervisor prior to the time they will be absent and submit a time off request for approval through Kronos. Hours must be recorded on the timesheet indicating Bereavement. Employees may be required to submit a copy of the obituary to their supervisor upon return to work.
7.21 **Jury Duty Leave** *(rev. 03/08/16)*

**Policy:** Regular employees scheduled to work a minimum of 20 hours a week who are required to appear in court for jury duty will be paid their regular pay less any amount received from the court. Employees must present a statement of jury duty and proof of payment to their supervisor. Employees not eligible for Jury Duty Leave will be given unpaid time off for such purposes.

On any day there is a change to the scheduled jury duty employees must notify their supervisor and return to work, if requested.

**Procedure:** Employees must provide a statement of jury duty to their supervisor prior to the time they will be absent. Upon return from jury duty, the employee must provide their supervisor proof of payment for jury duty and submit a time off request for approval through Kronos. Hours spent for jury duty must be recorded and identified as Jury Duty on the timesheet. The hours recorded shall not exceed the employee’s regular scheduled work hours. The supervisor will send the statement of jury duty service and proof of payment to Accounting for the corresponding pay period.

7.22 **Court Leave** *(rev. 03/08/16)*

**Policy:** Employees who are required to appear in court for job-related activities will be paid for the hours as work time. Employees must present a statement of court appearance to their supervisor.

On any day there is a change to the scheduled appearance for a job-related appearance, employees must notify their supervisor and return to work.

Employees required to appear in court for any non-job related activities must present a statement of court appearance to their supervisor and use accrued vacation, personal or unpaid leave.

**Procedure:** Employees must provide a statement of the required court appearance to their supervisor prior to the time they will be absent. For job-related appearances, employees shall record the hours as work time on their timesheets. For non-job related appearances, employees must submit a time off request through Kronos for time off without pay, personal leave, or vacation leave.

7.23 **Military Leave** *(rev. 05/10/11)*

**Policy:** Employees who are members of the U.S. Armed Forces or who are reserve members of the U.S. Armed Forces or state militia groups will be granted an unpaid leave of absence for military service, training, or other obligations in compliance with state and federal laws. Employees may use available paid leave (i.e. vacation, personal).

According to the Uniformed Services Employment & Reemployment Rights Act (USERRA) of 1994, as amended, employees on military leave who are enrolled in GLCAP’s health benefit plan are entitled to continued health coverage as provided under the Consolidated Omnibus Budget Reconciliation Act (COBRA).

At the conclusion of the leave, employees will be eligible for re-employment with GLCAP provided they apply for, and are available for, re-employment within the timeframe designated under USERRA.

**Procedure:** An employee requesting Military Leave must notify his or her supervisor and Human Resources as soon as possible and provide documentation of the dates of duty and other required documentation.
Pandemic Leave

Policy: The health and safety of our employees and participants is of utmost importance to GLCAP. In the event of pandemic events and other unexpected, extraordinary circumstances the President/CEO has the authority to grant continued compensation of wages and benefits to employees who are working a reduced schedule due to the Pandemic, who are not able to work remotely, who are themselves physically impacted, or who need to care for a spouse or child who are physically impacted.

The Pandemic event may require the full or partial closure of offices/centers, reductions and/or discontinuation of services, staffing adjustments, and staff reassignments. Employees may be asked to perform duties not normally regarded as his/her typical tasks due to the significant nature of such events.

During the course of the Pandemic, employees will be assigned the work/tasks that must be completed as necessary to ensure contractual obligations are met. This may equate to their normal, regularly scheduled hours or could involve a reduced schedule. Whether working in their normally assigned office, an alternate location, or in a telecommuting arrangement, employees will be expected to complete the work as assigned by his/her supervisor, program director, or the President/CEO.

The duration of Pandemic Leave pay will be at the discretion of the President/CEO based on information obtained from local, state, or federal authorities relative to conditions in each of our geographic areas. The duration of Pandemic pay will also be contingent upon the organization’s ability to fund such pay from our funding sources. In the event our funding sources cease to allow pandemic leave payment or specific grant funding terminates, affected employees will receive layoff notices.

Employees will be paid commensurate with their normal scheduled hours. On call and temporary workers are not eligible for Pandemic Leave pay.

The Pandemic Leave Policy will be implemented in conjunction with all other relevant personnel policies and procedures. Employees who are off work on an approved leave are not eligible for Pandemic pay; this includes scheduled vacation, sick, and personal time as well as leaves without pay.

The President/CEO will identify key staff who will be expected to be available to work throughout the duration of a Pandemic event.

Procedure: The President/CEO will monitor pandemic events and other unexpected, extraordinary circumstances to determine appropriate responses. Guidance and recommendations from health and other officials will be monitored to evaluate and determine appropriate changes to work arrangements and those changes/updates will be communicated to the affected staff by the President/CEO or his/her designee. These changes may include the full or partial closure of offices/centers, reductions and/or suspensions in services, staffing adjustments, and staff reassignments as necessary. Program directors, supervisors, and/or the President/CEO will identify and assign the work/tasks employees are expected to complete.
Addendum to Section 7 of GLCAP Personnel Policies and Procedures

In response to Families First Coronavirus Response Act Expires December 31, 2020

Consolidated Appropriations Act (CAA) 2021 Allowed Extension through March 31, 2021

American Rescue Plan Act of 2021 Allows Extension through September 30, 2021

Following are revisions effective April 1, 2021 in accordance with the American Rescue Plan Act of 2021:

Qualifying reasons for the Emergency Paid Sick Leave and Emergency Family Medical Leave Act are as follows:

1) Employee is subject to a Federal, State, or local quarantine or isolation order related to COVID-19.
2) The employee has been advised by a health care provider to self-quarantine due to concerns related to COVID-19.
3) The employee is experiencing symptoms of COVID-19 and seeking medical diagnosis.
4) Employee is caring for an individual who is subject to an order by a Federal, State, or local quarantine or isolation order related to COVID-19 or been advised by a health care provider to self-quarantine due to concerns related to COVID-19.
5) Employee is caring for a son or daughter if the school or place of care of the son or daughter has been closed, or the child care provider of such son or daughter is unavailable due to COVID-19 precautions.
6) Employee is experiencing any other substantially similar condition specified by the Secretary of Health and Human Services in consultation with the Secretary of the Treasury and Secretary of Labor.
7) Employee is obtaining COVID-19 vaccination.
8) Employee is recovering from any injury, disability, illness, or condition related to vaccination.
9) Employee is seeking or awaiting the results of a diagnostic test or medical diagnosis for COVID-19, or else their employer has requested such a test or diagnosis.

Emergency Paid Sick Leave

GLCAP will not discriminate against employees as a result of the approved use of Emergency Paid Sick Leave or a proper request for such leave. An employee cannot engage in employment anywhere while on leave with GLCAP and cannot engage in any activities inconsistent with his/her leave.

Full-time employees (averaged over 2-weeks for part-time employees & 6 months for variable hour employees) will receive their regular rate of pay for 2 weeks (80 hours) not to exceed $511/day and $5,110 total Emergency Paid Sick Leave if unable to come to work (or telework) due to a need for leave which shall be administered in accordance with applicable state and federal laws for reasons 1, 2, 3, 7, 8, and 9 above.

Full-time employees will receive two-thirds their regular rate of pay up to 80 hours (part-time employees hours are averaged over 2-weeks) not to exceed $200/day and $2,000 total Emergency Paid Sick Leave if unable to come to work (or telework) due to a need for leave which shall be administered in accordance with applicable state and federal laws for reasons 4, 5, and 6 above.
Emergency Family Medical Leave (EFMLA)

Per the Emergency Family and Medical Leave Expansion Act (during the period beginning on April 1, 2021 the date the act takes effect and ends on September 30, 2021), employees who have been employed for at least 30 calendar days are eligible to request a Public Health Emergency Leave of up to 10 weeks for a “Qualifying need related to a Public Health Emergency.”

- A “Qualifying Need” related to a public health Emergency includes reasons 1 through 9 above.
- A “Public Health Emergency” means an emergency with respect to COVID-19 declared by a Federal, State, or local authority.
- A “Child Care Provider” means a provider who receives compensation for providing child care services on a regular basis, including an ‘an eligible child care provider’ (as defined in section 658 P of the Child Care and Development Block Grant Act of 1990 (42 U.S.C. 9858n)).
- “School” means an ‘elementary school’ or ‘secondary school’ as such terms are defined in section 8101 of the Elementary and Secondary Education Act of 1965 (20U.S.C. 7801).
- Relationship to Emergency Paid Sick Leave
  a. Requests under the Emergency Paid Sick Leave Policy must be used prior to requesting Emergency Family and Medical Leave.
  b. Employees must use accrued unused paid time off for the first 10 days of leave. If paid time is not available, the first 10 days is unpaid.
  c. Employees will receive not less than 2/3 of regular rate of pay up to 10 weeks based on the number of hours scheduled to work not to exceed $240/day and $12,000 total.

Procedure: To request an emergency paid leave or emergency family medical leave, email Adrienne Fausey at anfausey@glcap.org and include Emergency Leave in the subject line. You must include the documentation necessary to support the leave. Following explains the documentation required for COVID-19 related leave reasons. All requests must include responses to numbers 1 through 4.

Documentation required for leaves:
Request for leave from employee that provides:

1. Name of Employee.
2. Date or dates for which leave is requested.
3. Employee statement of the COVID-19 related reason for the leave and written support for the leave.
4. A statement that the employee is unable to work, including means of telework, for the reason requested.
5. For leave request based on quarantine order or self-quarantine advice: Employee statement must also include: Name of the governmental entity ordering the quarantine or name of the health care professional advising self-quarantine.
6. For leave request based on quarantine order or self-quarantine advice of an individual: Employee statement must also include: Name of the governmental entity ordering the quarantine or name of the health care professional advising self-quarantine, and name and relation of individual to employee.
7. **For leave requested based on school closing or childcare provider unavailability:** Employee statement must also include: Name and age of child or children to be cared for, the name of the school that has closed or place of care that is unavailable, and a representation that no other person will be providing care for the child during the period for which you are requesting Emergency Paid Sick Leave.

8. **If child is older than fourteen:** Employee statement must also include: representation of the need to provide care during daylight hours and a statement that special circumstances exist requiring the employee to provide care.

9. **For leave requested based on obtaining a COVID-19 vaccination:** Employee must provide proof of appointment date & time and proof of vaccination.

10. **For leave requested based on the need to recover from any injury, disability, illness, or condition related to vaccination:** Employee must provide proof of vaccination if not already provided and written support for the leave.

11. **For leave requested based on seeking or awaiting the results of a diagnostic test or medical diagnosis for COVID-19, or else their employer has requested such a test or diagnosis:** Employee must provide date of test and the results of test/diagnosis and written support for the leave.
SECTION 8
STANDARDS OF CONDUCT

8.1 Standards of Conduct

Policy: Employees, board members, consultants, and volunteers are required to abide by the following standards of conduct. These standards have been established to protect employees, board members, volunteers, participants, and GLCAP from injury or threats to their well-being and to promote a harmonious and efficient work atmosphere.

Accordingly, the list below summarizes some of the unacceptable activities and conduct which GLCAP expects all employees, board members, consultants, and volunteers to comply. Some of these activities and examples of misconduct are addressed more specifically in other sections of this manual, while others may not. Regardless, employees, board members, consultants and volunteers are expected to comply with all standards of conduct, whether or not these standards are expressly listed below or whether the conduct is expressly included in another policy or procedure within this manual. This policy should not be interpreted to restrict or interfere with employees, board members, consultants, or volunteers’ legal rights, free speech, or whistleblower protections. Failure to observe any aspect of the Standards of Conduct may lead to disciplinary action up to and including termination.

This list is not intended to be all-inclusive, but rather offers general guidelines for employees to follow, in conjunction with other policies specified in this manual.

1. Violation of any policy, contract provision, or rule; or any action that is detrimental to GLCAP efforts to operate efficiently and effectively.
2. Engage in conduct that in any manner discredits the operations, ethical standards or reputation of GLCAP, or is illegal or offensive to other employees, volunteers, participants, the general public or other persons.
3. Disregard or circumvent GLCAP policy or engage in unscrupulous dealings.
4. Attempt to accomplish by indirect means, through agents or intermediaries, that which is strictly forbidden.
5. Use the employee’s position or board status with GLCAP for personal gain or advantage while engaging in any business interest or transaction, or be engaged in any activity that conflicts with the proper discharge of duties.
6. Violation of security, health, or safety rules, or failure to observe health or safety rules or GLCAP safety or health practices; failure to wear required safety or health equipment; tampering with equipment or safety equipment.
7. Negligence or any careless action which endangers the life, health, safety or security of another person.
8. Being intoxicated or under the influence of a controlled substance while at work; use, possession or sale of a controlled substance in any quantity while on corporate premises, except medications prescribed by a physician which do not impair work performance.
9. Unauthorized possession of dangerous or illegal firearms, weapons or explosives on GLCAP property or while on duty.
10. Engaging in criminal conduct or acts of violence or making threats of violence toward anyone on GLCAP premises or when representing GLCAP; fighting, or provoking a fight on GLCAP property or negligent damage of property.
11. Insubordination or refusing to obey instructions properly issued by supervisors pertaining to employees work; refusal to help out on a special assignment.
12. Threatening, intimidating or coercing fellow employees, volunteers, board members, or participants on or off the premises at any time, for any purpose.
8.1 Standards of Conduct (continued)

13. Engaging in an act of sabotage; negligently causing the destruction or damage of GLCAP property, or the property of fellow employees, participants, suppliers, or visitors in any manner.

14. Theft or unauthorized possession of GLCAP property or the property of fellow employees, volunteers, board members, or participants; unauthorized possession or removal of any GLCAP property, including documents and electronic files from the premises without prior permission from management.

15. Unauthorized use of GLCAP equipment, assets, services, personnel, property, supplies, or other resources for personal reasons, for profit, or on behalf of any entity, person, or for any other purpose than GLCAP official discharge of duties.

16. Attempt to gain access to, give, or disclose Personally Identifiable Information (PII), confidential or proprietary information about the property, business, operations, or affairs of GLCAP to competitors, other organizations, individuals, or unauthorized GLCAP employees without proper authorization.

17. Use any confidential or proprietary information about GLCAP to advance the financial or other private interest of himself/herself or others.

18. Dishonesty; falsification, alteration, or misrepresentation on an application for employment, timesheet or any other GLCAP documents or work records.

19. Falsification of doctor’s statements, lying for the purpose of gaining approval to use sick or personal leave; falsifying the reason for a leave of absence.


21. Engage in employment, or accept private employment with, or render services for a private employer when that employment or service is incompatible with the proper discharge of duties.

22. Intentionally searching for and/or releasing Personally Identifiable Information (PII) of employees, volunteers, or participants.

23. Spreading malicious gossip and/or rumors; engaging in behavior which creates discord and lack of harmony; interfering with another employee on the job; restricting work output or encouraging others to do the same.

24. Immoral conduct or indecency on GLCAP property; engaging in criminal, unethical or criminally immoral activity on business or personal time.

25. Conducting personal gambling, lottery and other games of chance while in the performance of GLCAP duties.

26. Unsatisfactory or careless work; failure to meet production or quality standards as explained by supervisors.

27. Any act of harassment, sexual, racial or other; telling sexist or racist jokes; making racial or ethnic slurs, engaging in any illegal discriminatory activity.

28. Engaging in sexual relations with participants.

29. Leaving work before the end of a workday or not being ready to work at the start of a workday without supervisor approval; stopping work before time specified. Refusing to work extra hours or overtime when required.

30. Sleeping, loitering, or wasting time during working hours.

31. Excessive uses of GLCAP telephone for personal calls, personal cell phone for personal calls or other personal use, or GLCAP computers for personal e-mail correspondence, web browsing, or other personal use during work time.

32. Smoking in restricted areas or at non-designated times, as specified by GLCAP rules.

33. Creating or contributing to unsanitary conditions.
8.1 Standards of Conduct (continued)

34. Posting, removing or altering notices on any bulletin board on GLCAP property without the permission of management.
35. Failure to report an absence or late arrival; excessive absence or tardiness.
36. Buying GLCAP merchandise for resale.
37. Obscene or abusive language toward any supervisor, employee, volunteer, board member, or participant; indifference or rudeness towards a participant, volunteer, board member or fellow employee; any disorderly/antagonistic conduct on GLCAP premises.
38. Speeding or careless driving of GLCAP vehicles or in a personal vehicle while on GLCAP business; driving a GLCAP owned vehicle, or driving a personal vehicle on GLCAP time while under the influence of drugs and/or alcohol.
39. Failure to immediately report damage to, or an accident involving GLCAP equipment.
40. Failure to use a timesheet; alteration of a timesheet or records or attendance documentation; altering another employee’s timesheet or records, or causing someone to alter timesheets or records.
41. Failure to respect and promote the unique identity of each participant and family and refrain from stereotyping on the basis of gender, race, ethnicity, culture, religion, disability, sexual orientation, or family composition.
42. Leaving a child alone or unsupervised.
43. Engaging in corporal punishment, emotional or physical abuse, or public or private humiliation of a participant; rejecting, terrorizing, extended ignoring, or corrupting a participant.
44. Employing methods of discipline that involve isolation, the use of food as punishment or reward, bind or tie a participant to restrict movement or tape a participant’s mouth, use physical activity or outdoor time as a punishment or reward or use toilet learning/training methods that punish, demean, or humiliate a child or the denial of basic needs.
45. Engaging in any form of verbal abuse, including profane, sarcastic language, threats or derogatory remarks about the participant or participant’s family.
46. Intentionally violate federal and program eligibility determination regulations and enroll those not eligible to receive services.
47. Make decisions when a financial interest exists in companies or other entities that do business with GLCAP.
48. Accept or seek any gifts valued greater than $25, whether in the form of services, loan, item, or promise from any member, person, firm, or organization that has an interest, directly or indirectly, in any manner whatsoever, in business dealings with GLCAP, or which receipt of a gift could influence the employee in discharge of GLCAP duties.
49. Grant, in the discharge of GLCAP duties, any improper favor or service, or promise any item of value.
50. Represent any private interest in any action or proceedings against GLCAP.

Nothing contained in this policy, or manual, including the imposing of any form of disciplinary action shall alter the employment at will relationship between GLCAP and its non-bargaining unit employees, or create a right to continued employment.

Procedure: Employees, consultants, and volunteers shall direct questions concerning any work or safety rule, or any of the unacceptable activities listed above to supervisors. Supervisors are responsible for monitoring employee, consultant, and volunteer conduct and enforcing these standards of conduct and other policies and procedures specified in this manual. Board members shall direct questions to the Board Chairperson and/or President/CEO.
8.2 Conflict of Interest

**Policy:** GLCAP employees, board members, consultants, volunteers, and/or agents providing services or goods to GLCAP must avoid any real or perceived conflicts of interest.

**Procedure:** GLCAP employees, board members, consultants, volunteers, and/or agents providing services or goods to GLCAP will conduct activities to support the mission of GLCAP and will not advance or promote their own interest, the interest of family members, or others with whom they have a relationship.

GLCAP employees, consultants, volunteers, and/or agents providing services or goods to GLCAP will disclose in writing any conflicts of interest at initial employment or service and every two years thereafter. If a conflict, or potential conflict, or appearance of conflict, arises, the individual will report that conflict to the Chief Financial Officer in order to seek resolution. In the case of a board member, that individual will report the conflict to the Board Chairperson and/or President/CEO in order to seek resolution.

A person who has a conflict of interest will not participate in or be permitted to hear management’s, the board’s, or committee’s discussion of the matter, except to disclose material facts and respond to questions. Such person will not attempt to exert his/her personal influence with respect to the matter.

No board member shall participate in GLCAPs selection, award or administration of any contract or other agreement for the furnishing of services or supplies to the organization, in which he/she, or his/her immediate family or partner, has a real or potential conflict of interest (financial or otherwise) or with whom he or she is negotiating or has any arrangement concerning employment. Notwithstanding the forgoing, such contract may be approved or authorized by a majority of the disinterested board members present at a meeting where a quorum exists if the facts of any such interest of a board member have been disclosed to the entire Board by the interested board member prior to or at the meeting where the contract is approved or authorized. The interested board member must abstain from the Board’s deliberations and voting in that regard.

8.3 Ethical Conduct

**Policy:** All employees and board members are expected to observe high standards of business and personal ethics in the conduct of their duties and responsibilities and to perform within federal, state, and local laws and other rules and regulations established by GLCAP, grantees, and other entities with jurisdiction over GLCAP. Unethical actions, or the appearance of unethical improprieties, are unacceptable under any conditions. Each employee and board member is expected to conduct himself, both on and off the job, within the guidelines set forth in this policy. Conduct that brings discredit to GLCAP, or that is illegal or offensive to clients, the general public or fellow employees will not be tolerated.

**Procedure:** GLCAP recognizes and respects each employee's and board member’s right to engage in activities outside of the employment or service relationship, provided those activities do not in any manner conflict with ethical standards, or reflect adversely on GLCAP.
8.3 Ethical Conduct (continued)

Each employee and board member must apply her or his own sense of personal ethics, which should extend beyond compliance with applicable laws and regulations in business situations, to govern behavior where no existing regulations provide a guideline. Each employee and board member is responsible for applying common sense in business decisions where specific rules do not provide all the answers. In determining compliance with this standard in specific situations, employees and board members should ask themselves the following questions:

1. Is my action legal?
2. Is my action ethical?
3. Does my action comply with GLCAP policy?
4. Am I sure my action does not appear inappropriate?
5. Am I sure that I would not be embarrassed or compromised if my action became known within the Organization or publicly?
6. Am I sure that my action meets my personal code of ethics and behavior?
7. Is my action debatable with the grant monitor or auditor?
8. Would I feel comfortable defending my actions on the 6 o’clock news?

Each employee should be able to answer “yes” to all of these questions before taking action. Each director, manager, and supervisor is responsible for the ethical business behavior of her or his subordinates. Directors, managers, and supervisors must carefully weigh all courses of action suggested in ethical, as well as economic, terms and base their final decisions on the guidelines provided by this policy, the Standards of Conduct policy, as well as their personal sense of right and wrong. The President/CEO or his/her designee maintains the right to determine when an employee's activities or actions are in conflict with this expectation.

Employees who have any doubt about the applicability of this policy to a particular situation are expected to contact their supervisor prior to engaging in the activity or situation in question. If the supervisor is in doubt, the supervisor may confer with the Director or Human Resources. As necessary, GLCAP legal counsel may be contacted by the President/CEO or designee for guidance and direction.

Each board member should be able to answer “yes” to all these questions before taking action. Board Members who have any doubt about the applicability to a particular situation shall contact the Board Chairperson and/or the President/CEO. As necessary, GLCAP legal counsel may be contacted by the President/CEO or designee for guidance and direction.

8.4 Whistleblower Protection (New 03/08/16)

Policy: GLCAP requires all employees, volunteers, and board members of GLCAP to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of GLCAP, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.
8.4 **Whistleblower Protection (continued)**

Employees are encouraged and enabled to raise serious concerns internally, without fear of retaliation, so that GLAP can address and correct inappropriate conduct and actions. It is against the values of GLCAP to retaliate against any individual who in good faith reports an illegal, dishonest, or fraudulent act or a suspected violation of any regulation governing the operations of GLCAP. An employee who retaliates against an individual who has reported a violation in good faith is subject to discipline up to and including termination.

**Procedure:**

**Reporting Responsibilities:** Anyone who has knowledge of or a concern of an illegal, dishonest, or fraudulent act or a suspected violation of any regulation governing the operations of GLCAP is to contact his/her supervisor, Director, or the Human Resource Director immediately and should not attempt to personally conduct investigations or interviews/interrogations related to any violation or suspected violation. If the employee wishes to remain anonymous, a detailed written explanation of suspected violation can be submitted to the Human Resource Director.

Supervisors and managers are required to report complaints or concerns about suspected illegal, dishonest, or fraudulent acts or violations of any regulation governing the operations of GLCAP to the Human Resource Director.

Complaints or concerns that involve the Human Resource Director must be reported immediately to the President/CEO.

**Investigating Responsibilities:** The Human Resource Director is responsible for ensuring that all complaints of an illegal, dishonest, or fraudulent act or a suspected violation of any regulation governing the operations of GLCAP are investigated and resolved. The Human Resource Director will advise the President/CEO of all complaints and their resolution. The Human Resource Director 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.

In fulfilling investigative responsibilities, the Human Resource Director, President/CEO, and CFO shall have authority to advise and/or contract for the services of outside firms, including but not limited to law firms, CPA firms, forensic accountants, investigators, etc.

**Accounting and Auditing Matters:** The Human Resource Director shall immediately notify the CFO of any concerns or complaints regarding corporate accounting practices, internal controls or auditing and work with the CFO until the matter is resolved.

The Human Resource Director shall immediately notify the President/CEO of any concerns or complaints regarding corporate accounting practices, internal controls or auditing that involve the CFO and work with the President/CEO until the matter is resolved.

**Acting in Good Faith:** Anyone filing a written complaint concerning a violation or suspected violation must act 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:** GLCAP will make every reasonable effort to conduct all proceedings in a manner that will protect the confidentiality of all parties to the extent possible and consistent with the need to conduct a thorough investigation and comply with federal, state, and local laws. The existence, the status, or results of investigations into suspected misconduct shall not be disclosed or discussed with any individual other than those with a legitimate need to know in order to perform their duties and fulfill their responsibilities effectively.
**Disclosure to Outside Parties:** Allegations of and information related to suspected violations shall not be disclosed to third parties except to outside law firms or investigators if hired by the organization to aid in the investigation, Federal awarding agencies if Federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the Federal award (CFR 200.113 Mandatory disclosures), and/or external auditors of frauds known or material.

**No Retaliation:** It is contrary to the values of GLCAP for anyone to retaliate against an individual who in good faith reports a violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of GLCAP. Retaliation includes, but is not limited to, protection from retaliation in the form of an adverse employment action such as termination, compensation decreases, or poor work assignments and threats of physical harm. Any whistleblower who believes he/she is being retaliated against must contact the Human Resources Director immediately. The right of a whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated. An employee who retaliates against an individual who has reported a violation in good faith is subject to discipline up to and including termination of employment.

**Protection of Records:** GLCAP prohibits the knowing destruction, alteration, mutilation, or concealment of any record, document, or tangible object with the intent to obstruct or influence the investigation or proper administration of any matter within the jurisdiction of any department or agency of the United States government, or in relation to or contemplation of any such matter or case. Violations will result in disciplinary action up to and including termination.

Members of the investigative team shall have free and unrestricted access to all GLCAP records and premises, whether owned or leased, at all times. They also have the authority to examine, copy, and remove all or any portion of the contents (in paper or electronic form) of filing cabinets, storage facilities, desks, credenzas and computers without prior knowledge or consent of any individual who might use or have custody of any such items or facilities when it is within the scope of an investigation into suspected misconduct or related follow-up procedures.

**Examples of Suspected Violations include but is not limited to:**

a. Willfully violate or circumvent federal, state, local, or foreign laws or regulations.
b. Discrimination.
c. Forgery or alteration of checks, bank drafts, documents, contracts, purchase orders, receiving reports, or other records including electronic records.
d. Destruction, alteration, mutilation, or concealment of any document or record with the intent to obstruct or influence an investigation, or potential investigation, carried out by a department or agency of the federal government or by GLCAP.
e. Impropriety of the handling or reporting of money in financial transactions.
f. Failure to report known instances of misconduct including tolerance by supervisory employees of misconduct of subordinates.
g. Theft, embezzlement, or other misappropriation of money, funds, property, or assets including assets of or intended for GLCAP, those of our clients, subcontractors, vendors, contractors, suppliers, and others with whom the organization has a business relationship.
h. Intentional misstatements in the organization’s records, including intentional misstatements of accounting records or financial statements.
i. Authorizing or receiving payment for goods not received or services not performed.
j. Other fraudulent financial reporting.
8.5 Manager-Subordinate Non-Fraternization (New 05/10/11)

Policy: While GLCAP encourages amicable and professional working relationships between management and their direct and indirect reports, it also recognizes that involvement in a romantic relationship between management and someone supervised, either directly or indirectly, can compromise that manager’s ability to effectively perform management responsibilities, including but not limited to assigning of work, evaluating performance, administering discipline and in making other management decisions inherent in the job. Likewise, a romantic relationship between a manager and someone that manager supervises can create a perception of favoritism, whether it exists or not, or could evolve into misunderstandings and difficult issues for GLCAP and its employees that can be avoided by its managers maintaining only professional working relationships with employees supervised.

Therefore, GLCAP prohibits involvement of a romantic nature between a member of management and anyone s/he supervises, either directly or indirectly. Both the manager and his or her subordinates are responsible for following and conducting themselves in a manner that is consistent with this policy. Failure to comply with this policy will subject both parties to disciplinary action, up to and including termination.

Procedure: Fraternization among supervisors and subordinates must be strictly avoided. Non-adherence to this policy will subject both parties to disciplinary action, up to and including termination.

8.6 Harassment (rev.01/10/17)

Policy: GLCAP intends to provide a work environment that is pleasant, professional, and free from intimidation, bullying, hostility or other offenses which might interfere with work performance. All employees are expected to treat other employees, volunteers, and participants with dignity and respect. Harassment of any sort – verbal, physical, visual – will not be tolerated. Harassment can include bullying, sexual harassment, harassment based on race, color, citizenship status, national origin, ancestry, gender, sexual orientation, age, religion, creed, qualified mental or physical disability, marital status, veteran status, political affiliation, military status, employee and family genetic information or any other factor protected by law, or any personal characteristic of the employee.

Responsibility: All GLCAP employees and managers, have a responsibility for keeping our work environment free of harassment. Any employee, who becomes aware of an incident of harassment, whether by witnessing the incident or being told of it, must report it to their immediate supervisor or the designated management representative with whom they feel comfortable. When management becomes aware of the existence of harassment, it is obligated by law to take prompt and appropriate action, whether or not the person making the complaint wants GLCAP to do so.

Retaliation: GLCAP prohibits any employee from retaliating in any way against anyone who has raised any concern about sexual or any other form of harassment or discrimination against another individual. No adverse action will be taken for any employee, volunteer, or participant making a good faith report of alleged harassment. Retaliation of any sort will not be permitted.

Charges made without good faith: The charge of workplace harassment is very serious because GLCAP considers harassment to be a major offense of policy. Therefore, allegations of harassment must always be made in good faith, and in consideration of the employee’s honest assessment of the situation and facts. False accusations against innocent persons made maliciously, without basis in fact, is as serious as the act of harassment itself, and is strictly prohibited.
8.6 **Harassment (continued)**

**Personal Liability**: GLCAP and the law may hold the individual who makes unwelcome advances, threatens or in any way harasses another employee personally liable for such actions and their consequences. GLCAP may or may not provide legal, financial or any other assistance to an individual accused of harassment if a legal complaint is filed.

**Procedure:**

**Reporting**: While GLCAP encourages employees to communicate directly with the alleged harasser, and make it clear that the harasser’s behavior is unacceptable, offensive or inappropriate, they are not required to do so. It is essential, however, to notify a supervisor, other management representative, or Human Resources immediately even if unsure the offending behavior is considered harassment. Any incident of harassment must be immediately reported to Human Resources. Appropriate investigation will be taken to determine if the incident constitutes harassment.

If an employee is witness to harassment of another employee or person, the witnessing employee is required to report the incident to a supervisor, other management representative, or Human Resources.

All reports will be promptly investigated with sensitivity however, confidentiality cannot be assured. GLCAP will also take any additional action necessary to appropriately remedy the situation.

During the course of the investigation, the employee against whom the charge is made may be placed on administrative leave with pay. Such leave may continue throughout the investigation up to its completion and resolution.

The employee making the charge of harassment is expected to cooperate during the investigation, as well as any witnesses and other employees who are called upon to provide statements or testimony during the investigation. Employees are expected to be truthful and complete in their responses, and are prohibited from hindering a harassment investigation in any manner.

If no resolution is possible by informal discussion, the issue will be referred to GLCAP legal counsel. After review of the results of the investigation, GLCAP legal counsel will render an opinion to GLCAP Administrative Staff who will take appropriate action based on the finding.

Any incidents of harassment will be subject to continued monitoring to ensure the effectiveness of any remedial action taken and to prevent further incidents from occurring. Any employee found to have harassed a fellow employee, volunteer, participant, or subordinate will be subject to disciplinary action up to and including termination.

**Definitions:**

**What is Harassment?** Workplace harassment can take many forms. It may be, but is not limited to, words, signs, offensive jokes, cartoons, pictures, posters, e-mail jokes or statements, pranks, intimidation, physical assaults or contact, or violence. Harassment is not necessarily sexual in nature. It may also take the form of other vocal activity including derogatory statements not directed to the targeted individual but taking place within their hearing. Other prohibited conduct includes written material such as notes, photographs, cartoons, articles of a harassing or offensive nature, and taking retaliatory action against an employee, volunteer, or participant for making a harassment complaint.
8.6 Harassment (continued)

What is Bullying? Bullying behavior toward anyone is unacceptable workplace behavior. Bullying or victimizing another employee is also considered “harassment.” Bullying behavior includes but is not limited to the following:

- **Verbal Bullying:** Repeated infliction of verbal abuse such as persistent name calling that is hurtful, insulting, or humiliating; using a person as the butt of jokes; abusive or offensive remarks.
- **Physical Bullying:** Pushing, shoving, kicking, poking, tripping, assaulting or threat of physical assault; damaging a person’s work area or property.
- **Gesture Bullying:** Nonverbal threatening gestures or glances that convey threatening messages.
- **Other Types of Bullying:** Socially or physically excluding or disregarding a person in work, volunteer, or participant-related activities; exploitation of a physical vulnerability; sabotaging or undermining an employee’s work performance; sabotaging or undermining a participant’s request for service.

What is Sexual Harassment? Sexual harassment may include unwelcome sexual advances, requests for sexual favors, or other verbal or physical contact of a sexual nature when such conduct creates an offensive, hostile and intimidating working or service environment and prevents an individual from effectively performing the duties of their position or requesting services. It also encompasses such conduct when it is made a term or condition of receiving services, volunteer opportunities, employment, or compensation, either implicitly or explicitly and when an employment, volunteer, or service decision is based on an individual’s acceptance or rejection of such conduct. Sexual harassment crosses age and gender boundaries and cannot be stereotyped. Among other perceived unconventional situations, sexual harassment may even involve two women or two men.

Generally, there are two broad categories of sexual harassment. The first, “quid pro quo,” may be defined as an exchange of sexual favors for receiving services, volunteer opportunities, improvement in working conditions, compensation, or other terms and conditions of service or employment. It may also include threats of service loss, job loss or other change in employment, volunteer, or service terms and conditions for failure of an employee, volunteer, or participant to submit to requests for sexual favors.

The second category, “hostile, intimidating, offensive working environment,” can be described as a situation in which unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature when such conduct creates an intimidating or offensive environment. Examples of a hostile, intimidating, and offensive working environment includes, but is not limited to, pictures, cartoons, symbols, or apparatus found to be offensive and which exist in the workspace of an employee or volunteer. This behavior does not necessarily link improved working conditions in exchange for sexual favors. It may also include, and is also against GLCAP policy to download inappropriate pictures or materials from computer systems.

What is Third Party Harassment? Sexual, racial and other forms of harassment can also involve a third party. Therefore, GLCAP strives to provide to its employees and volunteers a work environment - free from unlawful discrimination and hostility - as it pertains to the working relationships between employees, volunteers, and persons who do business with GLCAP such as members, vendors, contractors, consultants, and others.
8.6 Harassment (continued)

If an employee experiences unlawful discrimination or an unlawful hostile work environment in dealing with such non-employees doing business with GLCAP, the employee is required to notify Human Resources. Appropriate resolution may include informing the violator of the problem, and ordering the violator to cease and desist the unlawful behavior. Repeated unlawful discrimination or harassment, or the continuation of creating an unlawful hostile work environment may result in GLCAP ceasing to do business with such person or firm.

What is Non-Sexual Contact? Handshakes, hugging, and other forms of non-sexual contact are allowable. However, when hugging is a full frontal embrace, there is the possibility that it will be misinterpreted in a sexualized context. Employees must respect the boundaries set by volunteers, participants, and fellow employees and if any resistance to physical contact is expressed, they should refrain from such contact.

8.7 Workplace Violence & Abuse

Policy: GLCAP makes reasonable efforts to provide for the safety and security of its employees and visitors. Employees are likewise expected to take reasonable care for their own protection and for the protection of others, and that of their personal property.

Any type of violence committed by an individual associated with GLCAP is prohibited. Workplace violence is unwelcome physical or psychological forms of harassment, threats or attacks that cause fear, mental or physical harm or unreasonable stress in the workplace or presence of an individual.

GLCAP will maintain a work environment that is free from all forms of workplace violence and will take every reasonable effort to ensure the safety and security of all employees, clients, and visitors, and will insist that all individuals be treated with dignity, respect, and courtesy.

Examples of workplace violence include but are not limited to the following:

- Threat: The expression of intent to cause physical harm and/or harm to property. Any actions, words, slurs, gestures that are perceived as a threat to safety of others, or intentional destruction or threatening to destroy GLCAP leased/rental property. The display of any weapon.
- Physical Attack: With or without a weapon, a physical attack is an aggressive act of hitting, kicking, pushing, biting, scratching, sexual attack or any other such physical assault on another.
- Harassment: The act of creating a hostile work environment.

Any employee determined to have committed such acts may be subject to disciplinary action, up to and including termination. Non-employees engaged in violent acts that are determined to be infractions of this policy will be reported to the proper authorities, and further action will be taken if needed. Copies of Incident Reports will be on file in Human Resources.

Procedure: The following procedures will be followed to encourage a safe and secure working environment.

- All staff will be provided with a GLCAP photo ID for use when interacting with participants.
- Workplace Violence and Abuse Policy will be communicated to staff. Participants will be notified as necessary.
8.7 **Workplace Violence & Abuse (continued)**

- If an employee is subject to a form of workplace violence that could result in the immediate physical harm to the employee or others, the employee may take any appropriate and lawful action that ensures the employee’s and other person’s personal safety, which may include defusing the immediate situation or leaving the work area and contacting local law enforcement officials to handle the situation.

- All policy violations involving any employee or non-employee who is the perpetrator or subject of violence must be reported as follows:

  1. Report the complaint to your supervisor or management representative with whom you feel comfortable immediately.
  2. Complete the incident report.
  3. The Supervisor or management representative must notify and send the Incident Report to Human Resources.
  4. Human Resources will contact the Director and consult with others as necessary. If the threat or situation could result in physical injury or harm to anyone, Human Resources will notify the President/CEO or designee who will facilitate an investigation to resolve the issue.
  5. After consultation with the Director and/or the President/CEO or designee, a confidential investigation, conducted by appropriate GLCAP Representatives, will immediately be initiated to gather and document all facts about the complaint.
  6. After the investigation is complete, the appropriate GLCAP Representative will make a determination regarding the resolution of the incident.

Violations of this policy by an employee may lead to disciplinary action, up to and including termination and/or legal action as appropriate.

8.8 **Inappropriate Participant and Volunteer Behavior** *(New 01/10/17)*

**Policy:** Employees are responsible for setting boundaries if participants or volunteers attempt to engage in inappropriate activities with employees, volunteers, or other participants.

**Procedure:** Employees shall confront the person at the first sign of inappropriate behavior, identify the offensive behavior, explain that it is inappropriate, and ask the person to stop the behavior and not repeat it. Supervisors must be notified of all incidents. Supervisors must follow department procedures established by the Director.

8.9 **Drug-Free Workplace** *(rev. 03/08/16)*

**Policy:** GLCAP is committed to providing a safe work environment and to promoting the well-being and health of its employees. Therefore, GLCAP complies with federal law and adheres to the Drug Free Workplace Act, and expects employees to comply with requirements of this policy as a condition of their initial and continued employment. A safe and healthy work environment is endangered when any GLCAP employee illegally uses drugs on or off the job, comes to work under the influence, possesses, distributes or sells drugs in the workplace, or abuses alcohol on the job. Substance abuse, the illegal use of drugs, and the abuse of alcohol is incompatible with employment at GLCAP.
8.9 **Drug-Free Workplace (continued)**

Chemical dependency is a serious and complex, but treatable condition that negatively affects the personal and family lives of employees, their productivity and the stability of their work areas. GLCAP encourages those who abuse drugs or alcohol to seek help before the abuse impacts the employee’s life and work (see the Employee Assistance Program policy located in the Benefits section of this manual).

In order to meet our commitment to a drug-free work environment, the following policy has been established with regard to the use, possession or sale of drugs and abuse of alcohol:

- Employees may not use, possess, sell, trade, manufacture, offer for sale or offer to buy illegal drugs or otherwise engage in the illegal use of drugs on or off the job. Employees may not be in possession of literature on GLCAP property that embraces or encourages use of illegal drugs.
- Employees may not report to work under the influence of, or while possessing in their system, illegal drugs.
- Employees may not report to work under the influence of, or impaired by alcohol.
- Employees may not consume alcoholic beverages while performing duties on behalf of GLCAP on or off premises, or at any time while on GLCAP premises.
- Employees may not use prescription drugs illegally, i.e., to use prescription drugs that have not been legally obtained, or in a manner or purpose other than as prescribed. It is the responsibility of each employee to report the use of medically authorized drugs or other substances that can impair job performance to their supervisor and human resources. The employee must provide written approval from a physician to work while using such authorized drugs prior to performing any work for GLCAP. It is the responsibility of the employee’s physician to determine any possible impairment of work performance.

GLCAP owns all furnishings and equipment on its property, and therefore maintains authority to search the desks, work stations, and equipment and other property at any time, without prior notification to the employee to whom the property is assigned or by whom it is used. When there are reasonable grounds for suspecting that a search will result in the possession of illicit drugs, or other gross misconduct, or for the safety and security of employees, GLCAP may contact authorities to search any personal property brought onto GLCAP premises. Employees should expect no right of privacy as it pertains to personal items taken into GLCAP premises or stored in or on GLCAP furnishings and equipment. GLCAP maintains authority to remove any personal items that violate GLCAP rules and policies, and maintains the right to retain such items as long as it is necessary to substantiate misconduct and document disciplinary actions. Violation of this policy may result in disciplinary action up to and including termination.

**Procedure:** GLCAP employees are encouraged to use ProMedica Memorial Hospital’s Summit Employee Assistance Program should a need for alcohol/drug counseling be recognized. GLCAP will distribute EAP information to employees for their confidential use.

In accordance with the Drug Free Workplace requirements, employees are expected to comply with this policy, and will inform Human Resources in writing, if the employee is convicted of violating any criminal drug statute. In accordance with the Drug Free Workplace requirements, Human Resources will annually provide to each employee a packet that contains:

- information about the dangers of drug abuse in the workplace
- a posted/published statement, such as this Drug Free Workplace policy, drug testing policies and other related policies
- information relative to rehabilitation services, drug counseling, and employee assistance which are available in the area
8.9 Drug-Free Workplace (continued)

- information regarding penalties that could be imposed on employees who violate drug and alcohol policies
- a notice to employees advising them of their obligation to notify Human Resources, in writing, of any criminal drug statute conviction for an offense committed within the workplace.

8.10 Drug and Alcohol Testing

Policy: GLCAP has adopted this policy to ensure a safe, productive and healthy workplace, and to identify employees who violate GLCAP policy by illegally using drugs on or off the job, or abusing alcohol.

Drug tests will be administered to determine the presence of any illegal drugs included in the battery of tests required by GLCAP, the Department of Transportation, or any other funding or regulatory agency.

It shall be a condition of employment for all employees to submit to a substance abuse test and a verified negative test result under the following circumstances:

- **Pre-Employment:** All applicants will be required to submit to drug screening after a conditional offer of employment has been made and before they begin work. GLCAP will not discriminate against applicants for employment because of a past history of drug or alcohol abuse. It is the current illegal use of drugs that GLCAP will not tolerate.

  An employee who is off work for 30 days or more, who is in a position that requires a CDL, must submit to drug and alcohol screening prior to returning to their position. An employee who is off work for 90 days or more, who is in a position subject to Department of Transportation/Federal Transit Administration regulations, must submit to drug and alcohol screening prior to returning to their position. Any employee with a confirmed positive test will be denied return to employment. GLCAP will pay for return-to-duty testing. GLCAP will pay for pre-employment testing.

- **Reasonable Cause/Suspicion:** If facts, circumstances, physical symptoms, or a pattern of performance or behavior exists that would cause a supervisor to reasonably conclude that an employee may be under the influence of drug/alcohol, the supervisor is to contact Human Resources to discuss the situation. If it is determined that reasonable cause exists, the employee will be accompanied and driven to ProMedica 360 Health or the nearest approved medical facility for drug/alcohol testing. GLCAP will pay for reasonable cause/suspicion testing.

Examples of Reasonable Cause/Suspicion may include but shall not be limited to:

- direct observation, while at work, of substance abuse or have the physical symptoms or manifestations of being impaired due to substance abuse
- abnormal conduct or erratic behavior while at work, or a significant deterioration in work performance
- evidence that an employee has used, possessed, sold, solicited or transferred drugs while working or while on GLCAP premises, while operating a GLCAP vehicle, or while operating a personal vehicle while on GLCAP business
- direct observation of illicit drug use while the employee is on personal time
- information that an employee caused or contributed to an accident while at work
- at-fault motor vehicle offenses while on duty
8.10 **Drug and Alcohol Testing (continued)**

- aggressive physical contact, assaults, and flagrant violation of established safety, security or other operating procedures
- newly discovered evidence that the employee had previously tampered with a required drug test.

- **Post-accident:** Drug and alcohol testing shall be required whenever there is a reasonable possibility that drug or alcohol use may be a contributing factor to the accident. For purposes of this policy, an accident is an accident that occurs on GLCAP property, or when working for GLCAP, on or off GLCAP property, and which results in any of the following:
  - Bodily injury to an employee and/or another person that requires off-site medical attention.
  - A fatality of anyone involved in the accident
  - Vehicle or equipment damage, other than minor damage such as dents and scratches. All cases of minor damage must be approved by the Director.
  - A citation issued to the employee for any moving violation arising from an accident.

An employee who is injured in the accident will receive required emergency and immediate medical care prior to being required to submit to drug and alcohol tests. The test will be requested to be administered as soon as feasible after immediate medical care is given, with concurrence from the attending physician.

An employee not in need of medical care who is required to submit to post accident testing will be accompanied and driven to the testing site no later than 2 hours after the accident.

If an employee suffers a workplace injury and tests positive for using an illegal substance or is under the influence of alcohol, the employee may be ineligible to receive Worker’s Compensation. GLCAP will pay for post-accident testing.

- **Random:** In order to maintain effectiveness and establish a drug-free workplace, GLCAP will randomly drug test employees in the following positions: TRIPS designated positions, positions requiring a CDL, and Child Development employees in the bargaining unit and employees operating school vehicles for GLCAP programs. In addition, any employee who tests positive as a result of pre-employment, reasonable cause/suspicion, or post-accident testing who subsequently returns to work will be subject to random testing for the remainder of their employment. There is equal probability of selection for each employee each time the testing occurs and it will be based on objective, non-discretionary computer software operated and maintained by ProMedica 360 Health. Employees will remain in the selection pool even if previously selected for testing. Employees selected for random testing must report to ProMedica 360 Health or the nearest approved medical facility within 4 hours of notification. GLCAP will pay for random testing.

- **Return-To-Work/Follow-Up:** An employee’s return to service with GLCAP following drug or alcohol assessment and/or treatment, will be conditioned upon receipt of certification from a qualified substance abuse professional that verifies the employee is now in active recovery, and is now ready to return to perform job duties and responsibilities in accordance with GLCAP performance and policy standards. The employee must submit to and pass a Return-to-Work test before GLCAP determines the appropriateness of returning to work. Return to work testing will be at the employee’s expense.
**8.10 Drug and Alcohol Testing (continued)**

Follow-up testing will be conducted when an employee returns to work after previously testing positive, as well as for employees who self-refer for an assessment and/or treatment. Employees that test positive will be required to submit to follow-up drug/alcohol screening as determined by the EAP counselor and must comply with the treatment recommendations of the EAP counselor. In addition, the employee will be subject to random testing for the remainder of their employment with GLCAP. GLCAP will pay for follow-up testing. Nothing herein means or should be construed to mean that an employee who tests positive and subsequently receives treatment will necessarily be offered the opportunity to return to work. Such decisions will be made on a case by case basis, in consideration of facts and circumstances.

**Drug Arrests or Convictions:** All employees must notify Human Resources within 5 days of receiving a criminal drug arrest and subsequent conviction or acquittal, and will be required to undergo a drug test.

**Testing:** GLCAP will select the drug testing facility which will be responsible for conducting and evaluating drug tests on behalf of GLCAP. This laboratory will be certified and will attest to having a clear and well-documented procedure for collection, accounting, handling, and accessing of urine specimens, with procedures including an evidentiary chain of specimen sample custody and control. No test results submitted by any other laboratory will be recognized or used for making a selection decision or for determining compliance with GLCAP drug and alcohol policy.

Alcohol tests will be conducted and administered by a trained Breath Alcohol Technician or a law enforcement officer certified to conduct such tests.

The testing facility will provide to GLCAP and testing facility employees written testing procedures. Employees are encouraged to direct questions regarding the testing process to the testing laboratory.

Employees subject to testing who are currently taking a prescription or over-the-counter drug are required to inform the collector prior to taking the test. Upon request, the employee may be required to submit a copy of the prescription to the Medical Review Officer for verification.

The drug testing facility will inform both the employee and GLCAP Human Resources of the results of the drug and alcohol tests. Upon receiving a positive test result, the Medical Review Officer will provide opportunity for the employee to offer written explanation, or to provide medical statements from the employee’s health care provider to offer valid reasons for the presence of the prohibited drug or alcohol in the employee’s system.

GLCAP will require the drug testing facility to collect a sufficient urine sample so that a sample remains after the test to retest, if it is necessary to validate results of the initial test. An employee testing positive for drugs shall have a right to be retested, at the employee’s option. The cost of the retest will be assumed by the employee, if the retest is positive. If the retest is negative, GLCAP will pay for the retesting costs.
8.10 **Drug and Alcohol Testing (continued)**

An employee will be considered to have failed a drug or alcohol test when testing positive to an initial drug test and, as applicable, drug retest, or when the employee fails a breathalyzer test. An employee will also be considered to have failed a drug or alcohol test when the employee refuses to submit to a required test. Actions considered a refusal to submit to a test include, but are not limited to any one of the following. An employee’s failure to:

- arrive at the testing site at the directed time and place
- provide adequate urine for a drug test or insufficient breath for an alcohol test
- cooperate, or engaging in conduct that obstructs testing procedures, including but not limited to sabotaging the test by providing an adulterated sample.

**Procedure:** All employees will receive a copy of the Drug-Free Workplace Policy and will sign a consent form acknowledging the receipt and understanding of the policy and agreement to comply with the policy. GLCAP will provide on-going information about the dangers of drug abuse in the workplace, GLCAP Drug-Free Workplace Policy and the availability of counseling, rehabilitation and assistance programs.

A consent form will be obtained, signed and dated by the applicant or the employee prior to testing. Refusal to sign the consent form and/or to submit to testing shall result in the termination of the employment process for the applicant or termination of employment for a current employee.

ProMedica 360 Health, or an approved medical testing facility, will administer all drug and alcohol tests and shall meet the State of Ohio and Federal Requirements for Chain of Custody procedures. Complete details of the testing procedures utilized can be reviewed by contacting Human Resources.

When an employee or job applicant submits to a drug and/or alcohol test, they will be given a form to provide any information that s/he considers relevant to the test, including identification of currently or recently used prescription or non-prescription medication or other relevant information. If the job applicant or employee has a positive confirmed test result, a medical review officer will attempt to contact the individual in order to privately discuss the findings with the person. The medical review officer will take the listed medications into account when interpreting any positive confirmed test results.

When an applicant’s drug screen is confirmed to be positive the conditional offer of employment will be revoked.

When an employee’s drug/alcohol screen is confirmed positive the employee will receive a mandatory referral for assessment and/or treatment from an approved chemical dependency counselor. The employee will be placed on a disciplinary suspension without pay for one week. After one week the employee must use accrued but unused paid time. If the employee does not have accrued paid time available the employee will be on a leave without pay. The employee will remain off work until the employee receives and submits to Human Resources a release from the employee’s substance abuse counselor to return to work. Refusal to participate in assessment and/or treatment procedures will result in termination. Subsequent positive test results for that same employee will result in termination of employment with GLCAP. GLCAP follows U.S. Department of Transportation standards for drug and alcohol screening elements and cut-off levels.
8.11 Concealed Carry

Policy: Employees shall not possess, have under the person’s control, convey, or attempt to convey a deadly weapon or dangerous ordnance while conducting GLCAP business, on GLCAP premises, or in GLCAP owned or leased vehicles. Employees must abide by concealed carry laws when transporting or storing firearms or ammunition while using their personal vehicles. Violators of this policy may be subject to disciplinary action, up to and including termination.

Certified law enforcement officers are exempted from this policy, and thereby are permitted to carry authorized firearm and other ordnances onto GLCAP property in so far as the law enforcement officer is engaged in official duties, and conduct themselves in accordance with professional law enforcement rules, regulations and standards.

Procedure: All sites must post the Concealed Carry sign in a conspicuous place providing notice of the prohibition to all visitors and employees.

If an employee becomes aware of a breach of this policy by an employee or visitor, or in good faith, reasonably suspects that a policy violation is occurring, the employee is required to immediately report the suspected violation to the employee’s supervisor or Human Resources.

When the policy is possibly violated by an employee, the supervisor may confer with Human Resources, and may ask the employee to voluntarily demonstrate compliance with this policy, or at the option of the supervisor, law enforcement officers may be contacted to lawfully handle the situation. If a policy violation is reasonably suspected to have occurred, the supervisor will direct the employee to immediately leave the premises and the employee will be placed on paid administrative leave pending consultation with the Director, Human Resources and legal counsel. The name of the employee[s] reporting a possible violation will be handled sensitively during any investigation and will be shared with other persons only on a need-to-know basis.

When a visitor is reasonably suspected of carrying a concealed or visibly displayed weapon onto the premises, the supervisor may confer with Human Resources, and may ask the visitor to leave the premises, contact law enforcement, or consider any other lawful course of action in consideration of safety and security of self and others.

If, during the course of employment, an employee feels immediately threatened, uncomfortable or unsafe with any person, and when there appears to be an imminent threat of danger, the employee may take any appropriate and lawful action that ensures the employee’s and other person’s personal safety, which may include defusing the immediate situation or leaving the work area and contacting local law enforcement officials to handle the situation. As soon as practicable, the employee must notify the employee’s supervisor of the incident, who will notify the Director and Human Resources.

8.12 Safety and Health

Policy: GLCAP is committed to the safety and health of all employees and recognizes the need to comply with regulations governing injury and accident prevention and employee safety. Maintaining a safe work environment, however, requires the continuous cooperation of all employees.

We will maintain safety and health practices consistent with the needs of our industry. Employees in doubt about how to safely perform their job are responsible for asking their supervisor for assistance. Any suspected unsafe conditions, and all injuries that occur on the job, must be reported immediately. It is the responsibility of each employee to accept and follow established safety regulations and procedures.
8.12 **Safety and Health (continued)**

**Procedure:** Supervisors will review the safety and health rules and regulations with employees upon hire or transfer to a new site. All safety and health concerns should be forwarded to Human Resources.

8.13 **Workplace Smoking** *(rev. 03/08/16)*

**Policy:** GLCAP complies with Ohio’s smoke free workplace act and strives to provide a safe and healthy working environment for the public and its employees. Accordingly, smoking of cigarettes, cigars, pipes, use of electronic smoking devices, or any other tobacco-burning device is prohibited within GLCAP buildings. Employees are also expected to respect and follow the smoking rules of other entities when visiting and working in their facilities.

Smoking is permitted outside GLCAP buildings so long as smokers remain at least 10 feet from any entrances. Employees and visitors are not permitted to smoke in the areas immediately adjacent to any entrance to the building. Employees are expected to extinguish and properly dispose of their cigarette butts, and are expected to keep their designated smoking area completely free of cigarette butts and other debris.

Employees are permitted to smoke only at those times when they are completely relieved from duty. Taking unauthorized or excessive number of breaks to smoke is prohibited.

Although smoking is permitted in the employee’s personally owned vehicle when an employee is operating or riding in that vehicle for GLCAP business, smoking is prohibited when the employee is in the presence of a non-smoking coworker or other person when conducting GLCAP business.

Employees are also prohibited from chewing or otherwise using tobacco while working, or while on GLCAP premises.

**Procedure:** Employees must follow the building’s smoking rules and report any violations to their supervisor.

8.14 **Professional Insurance**

**Policy:** GLCAP provides professional liability insurance to protect the organization and its employees from alleged negligence. Employees who act in a malicious or intentionally wrongful manner may be held personally liable for their actions.

**Procedure:** Employees notified of a potential claim of negligence should immediately notify their supervisor. The supervisor will contact Accounting to handle the matter.

8.15 **Driving Criteria and Vehicle Usage** *(rev. 04/03/17)*

**Policy:** Employees who operate GLCAP owned, leased, or rented vehicles, or who operate their personal vehicle while conducting GLCAP business, are responsible for ensuring that vehicles are driven in a safe and courteous manner pursuant to state and GLCAP safety rules.

**Driving Eligibility:** GLCAP owned, leased, or rented vehicles are to be driven by authorized employees only. Employees must have a valid state driver’s license to operate a GLCAP vehicle or a personal vehicle while on GLCAP business. In addition, employees driving their personal vehicle must have proof of current auto insurance as defined below.
Driving Criteria and Vehicle Usage (continued)

An annual review of motor vehicle records will be conducted on employees who are required to drive a GLCAP or personal vehicle for GLCAP business. Employees are required to notify their supervisor in writing immediately of the following driving violations:

- Suspension or revocation of their driver’s license whether or not the incident occurred within the scope of employment;
- Convicted of driving under the influence of alcohol or controlled substances, reckless operation, regardless of whether the incident occurs within the scope of employment;
- Three moving violation convictions or at-fault accidents within an 18 month period.

GLCAP reserves the right to suspend work-related driving privileges and impose disciplinary action, up to and including termination, when unacceptable driving records and/or violations limit the employee’s ability to adequately perform their job.

Insurance: Auto insurance coverage not owned by GLCAP only covers liability on GLCAP for damage to a third-party vehicle or personal injury while the vehicle is being used by an employee for GLCAP business. Damage to employee owned vehicles, as well as injury to passengers, are the primary responsibility of the employee. GLCAP provides secondary insurance coverage in these instances.

Employees must provide proof of insurance with required limits prior to driving their personal vehicle on GLCAP business.

Accident Reporting: It is the employee’s responsibility to contact local law enforcement at the time of a vehicular accident and to obtain a copy of the accident/police report. The employee must contact Human Resources in person or by phone within 24 hours of the accident and provide a copy of the accident/police report.

All accidents will be reported to the GLCAP insurance company unless excluded on the direction of the CFO.

Traffic Violations: Employees that incur traffic violations while driving a vehicle for GLCAP business must notify Human Resources of the violation. All fines, expenses or penalties will be paid by the employee.

Procedure: Employees in positions with driving as a job requirement must have a current, valid driver’s license that covers the type of vehicle to be operated and must submit proof of personal insurance. Proof of personal insurance must be updated at renewal, not to exceed one year. No employee is permitted to operate a vehicle on behalf of GLCAP without proof of a valid current license and insurance.

In the event that an employee loses driving rights and license or insurance during the course of employment, the employee is required to notify his supervisor and Human Resources, and the employee will be prohibited from operating a vehicle on GLCAP business. Depending on the extent that driving is an essential job duty, and other facts and circumstances, GLCAP may or may not be able to accommodate the loss of driving rights on the job, and such employee may be subject to discharge from employment for failing to meet driving requirements of the job.

Employees who drive their personal vehicle for GLCAP business where driving is not a requirement of the position must obtain insurance coverage in accordance with applicable state law and with policy limits of at least $25,000 for each accident and $5,000 per person for bodily injury.
8.15 Driving Criteria and Vehicle Usage (continued)

Employees who drive their personal vehicle for GLCAP business where driving is a requirement of the position must obtain insurance coverage in accordance with applicable state law and with policy limits of at least $300,000 for each accident, $100,000 per person for bodily injury and $50,000 property damage for each accident.

Employees involved in an automobile accident while operating a GLCAP owned, leased or rented vehicle or personal vehicle on GLCAP behalf must report the accident to their supervisor and Human Resources within 24 hours of the accident and complete a GLCAP Automobile Accident Report. If the employee was injured in the accident, the employee and their supervisor are required to complete the forms in the Work Related Injury Information Packet and forward to Human Resources within 24 hours of the accident. Refer to the Drug-Free Workplace policy for additional information regarding post-accident drug and alcohol testing procedures.

Employees who incur traffic violations while driving a GLCAP or personal vehicle for GLCAP business must notify their supervisor and Human Resources immediately. In the case of a court-imposed suspension, the employee must forward a copy of the court documents to Human Resources.

8.16 Expense Reimbursement

Policy: GLCAP reimburses employees for the following job-related expenses:

- **Mileage**: Employees will receive mileage reimbursement when driving their personal vehicle on approved GLCAP business. Mileage must be submitted for reimbursement within 60 days of the end of the month that the mileage was incurred, or reimbursement will not be made.

- **Travel Expenses**: Employees will receive reimbursement for approved job-related travel expenses (i.e. parking, tolls, business telephone calls). Travel expense reimbursement amounts are established by the Federal Travel Regulations.

- **Per Diem Expenses**: Employees will receive an advance for payment of per diem expenses (i.e. conference, lodging, meal) when traveling for job-related purposes. Per diem amounts are established by the Federal Travel Regulations.

Specific standards and limitations for payment or reimbursement of expenses shall be included in the fiscal policies adopted by the Board. Employees are expected to read and understand this section of the fiscal policies to ensure that their expense reimbursement or payment requests comply with those standards and limitations.

Procedure: Employees must complete a Travel Report form and submit them to their supervisor in order to receive reimbursement for mileage or travel expenses (original receipts must be attached). The supervisor will approve the form and submit it to Accounting for payment. GLCAP retains authority to deny any expense when it is determined to be inappropriate, insufficiently documented, excessive or contrary to policy.

Employees must complete a Request and Authorization of Official Travel form and submit it to their supervisor in order to receive a per diem advance. A copy of the agenda or meeting notice must be attached. The supervisor approves and submits the Request and Authorization of Official Travel form and copy of the agenda and/or meeting notice to Accounting for processing. An Out-of-Town Travel Expense Statement must be submitted to Accounting within 7 calendar days of return from the trip if the originally approved travel plans changed.
8.17 **Employees Receiving Assistance from GLCAP-operated programs** *(New 11/13/07)*

**Policy:** GLCAP employees may receive assistance from programs operated by GLCAP if they meet all eligibility criteria for the program. Employees will not be given special consideration for assistance. Under no circumstances will the employee requesting the assistance process his/her own application.

**Procedure:** In the event that the employee applicant handles the application process for a program for which he/she is interested in applying for assistance, the supervisor must process the application. The Director must review and approve or deny the application following the appropriate program/funding source guidelines.

8.18 **Confidentiality** *(rev. 03/08/16)*

**Policy:** Information regarding participants, employees, grievance investigations, complaints, and certain programmatic issues is considered confidential. Employee medical information is confidential and must be maintained in a separate locked cabinet with limited access. Employees may also gain access to personal identifiable information (PII) and *sensitive* information that is not strictly confidential but which if disclosed, may be inappropriate or cause unnecessary problems for GLCAP. Employees shall consider PII and sensitive information to be confidential. Misuse or unauthorized disclosure of confidential information not otherwise available to persons or firms outside GLCAP is cause for disciplinary action up to and including termination.

Personal mail that is not job-related should not be sent to GLCAP.

Events may occur that will draw immediate attention from news media. Employees should not speak to the media and/or other outside organizations about confidential information or issues which affect GLCAP without prior approval of the President/CEO or designee. It is imperative that one person speaks for GLCAP to deliver an appropriate message and to avoid giving misinformation in any media inquiry. Respond to all media/reporter inquiries with: “I will have the appropriate person contact you.”

Employees may speak to the media and/or outside organizations about program events directly related to their position responsibilities.

In the event that outside legal counsel contacts an employee in regards to a dispute or other issue, the employee should not release any information but refer counsel to the President/CEO or his/her designee.

**Procedure:** Employees may not discuss any confidential information with those who do not have a job-related need for the information. When there is any question as to whether or not information is confidential or sensitive, employees are expected to consult with their supervisor prior to divulging the information.

Employees must notify the appropriate supervisor of any request for confidential information. The supervisor will notify the Director who will discuss the issue with the President/CEO or designee to determine a response.

Employees in a position requiring contact with the media and/or other outside organizations may speak about program events as they relate directly to their position without requesting approval. Any requests for information from an attorney or other legal representative must be referred to the President/CEO or his/her designee.
8.19 **Public Appearance**

**Policy:** Employees who are requested by an outside agency or organization to represent GLCAP (i.e., guest speaker, workshop/conference presenter, trainer) must notify their supervisor and Director to inform them of the type of event and any information and material to be presented. The Director maintains authority to approve or deny the appearance by the employee as a GLCAP representative when the event is not in the best interests of GLCAP or consistent with its mission, to substitute the employee with another, or to provide guidance on information to be presented.

**Procedure:** The notice submitted by the employee should be in writing to document the request, along with the approval or other instruction provided by the Director.

8.20 **Memberships/Participation in Organizations**

*(rev. 05/10/11)*

**Policy:** Membership or participation in any job-related organization or committee that may require time away from the job must have Director approval and the Director must notify the President/CEO. All memberships are to be in GLCAP name if paid for by GLCAP. The employee’s name may be specified under GLCAP as its representative.

Unless the employee is prior approved for membership through this policy and procedure, a membership will be considered voluntary, and GLCAP will not assume responsibility for fees and other associated costs. Time spent volunteering for organizations that are voluntary on the part of the employee shall not conflict with work time, or job performance and GLCAP shall assume no responsibility for associated costs and fees.

Factors considered for approval shall include the benefit of the membership to GLCAP, opportunity for the membership to enhance the employee’s job knowledge, skills and performance, costs and availability of budget. Memberships shall be paid only for those employees whose job performance and conduct meet expected standards.

As its representative, an employee is expected to represent GLCAP in a favorable and professional manner, and to promote GLCAP interests. It is expected that the employee be an active and respected member of the organization; however, activities and commitment of time that the employee devotes to the organization are expected to not interfere with job responsibilities and performance with GLCAP.

The privilege of membership may be revoked at any time when, in the judgment of the Director, the employee fails to perform to job responsibilities to expected performance or conduct standards, or when the employee fails to represent GLCAP appropriately or in GLCAP best interests.

**Procedure:** Employees seeking membership in an organization must submit a written request for supervisor approval to join the organization. The written request must include the purpose of the organization and how it relates to the employee’s job, the cost and terms of membership and the value of membership to the interests of GLCAP. The supervisor and Director will consider these factors, as well as the employee’s exemption status, length of service, overall qualifications for membership, work load, work record and job performance.

The supervisor approves or denies the request and sends it up the supervisory chain until it reaches the Director for final approval.
8.21 Personal Use of GLCAP Resources

Policy: Limited personal use of GLCAP copy machines, telephone, and fax is permitted within reason as long as GLCAP is reimbursed for incurred costs and the use is not excessive, or for extended duration. However, employees may not use GLCAP resources for secondary employment. The personal use of GLCAP resources such as: facilities, equipment, vehicles, etc. must be prior approved by the Director.

Procedure: All personal costs will be tracked at the job site. Payment must be submitted within 30 days of receiving billing.

8.22 Fundraising and Solicitation

Policy: Employee collections or sale of items for the benefit of non-profit organizations other than GLCAP or charitable assistance to local families or employees in distress is allowable provided that employees:

- Receive advance approval from the Human Resource Director
- Raise funds exclusively to serve charitable purposes and events
- Do so within their own work area, break room and/or common areas during non-working time and before or after the department’s work hours
- Do not pressure other employees to participate
- Do not use corporate e-mail
- Employees may use the fundraising forum located on the GLCAP Employee website
- Do not interrupt other employees during their work time

Employees may not sell items to generate a profit for themselves or others. The President/CEO or his/her designee has the authority to use e-mail for special circumstance cases.

Procedure: Complete the fundraising and solicitation form and submit to human resources prior to engaging in fundraising and/or solicitation. The Human Resource Director will review, approve or deny the request, and notify the employee of the decision.

Definitions:

Fundraising: Selling or promoting products, goods, or services; requesting and/or collecting money, services or items for a non-profit or charitable organization. Fundraising also includes selling raffle tickets or tickets to events such as dinners or dances to benefit individuals, groups of people or organizations.

Solicitation: Selling or promoting products, goods, or services not included within the definition of fundraising.

Non-work time: Lunch and break times during normal business hours, and any time before or after an employee’s normal work hours.
8.23 Gifts and Gratuities

Policy: In accordance with GLCAP ethical conduct policy, GLCAP employees will not solicit or accept for themselves or others any gifts, favors, entertainment, etc. from contractors or other persons/agencies doing business with GLCAP. Gratuities accepted on behalf of GLCAP must be reported to the Director for appropriate distribution.

Except where prohibited by regulation, employees may accept gifts of small and nominal value such as pens, bookmarks, coffee mugs, and other very inexpensive marketing give-away items if the value of the item is less than $25.

Procedure: When a gift, favor, or something of value is offered by a contractor, or other persons/agencies doing business with GLCAP for personal use or benefit, the offer must be declined. Gratuities offered and accepted on behalf of GLCAP should be immediately given to the Director for appropriate distribution.

8.24 Corporate Sponsored Events and Employee Recognition

Policy: To the greatest extent practical, GLCAP will attempt to create a workplace that encourages and promotes employee morale, health and the overall positive welfare of its employees. To accomplish this organization-wide events, information publications, and reimbursement for employee related expenses may be organized. Expenses should be incurred in accordance with established practices or customs for the improvement of working conditions, employer/employee relations, employee training, and employee morale and performance.

Costs for corporate-wide employee related activities will be equally deducted from the Corporation's grants, programs, contracts and activities. Any income generated due to fees paid by employees will be used to offset expenses incurred in the event that other employee welfare related funds are not available.

Procedure: The President/CEO or his/her designee will assign responsibility for the above activities and actions.

8.25 Hatch Act

Policy: As a recipient of federal funds all GLCAP employees are covered by the Hatch Act. Employees must maintain knowledge on the following permitted and prohibited activities.

Permitted Activities (During Non-Work Hours)
- Run for public office in nonpartisan elections
- Campaign for and hold office in political clubs and organizations
- Actively campaign for candidates for public office in partisan and nonpartisan elections
- Contribute money to political organizations and attend political fundraising functions

Prohibited Activities
- Be a candidate for public office in a partisan election if an employee’s wages/salary are fully funded by federal dollars
- Use official authority or influence to interfere with or affect the results of an election or nomination
- Directly or indirectly coerce contribution from subordinates in support of a political party or candidate

Procedure: Employees are expected to abide by the above permitted and prohibited activities. If there is any concern whether an activity is allowable, the employee must request approval from the Director who before acting, may need to confer with legal counsel.
Policy: Cellular phones will be provided to employees who have no other means of communication at their work site (at least one phone per site) and employees/sites that are mandated to have means of emergency communication. Employees who go into participants’ homes on a regular basis will be provided a cellular phone for emergency use only if the employee does not have a personal cellular phone for emergency use.

Personal calls are not allowed to be made or received with the phones. All calls must be for business use only.

Designated positions that require the use of a cellular phone to perform their job duties will be required to obtain a personal cellular phone and will receive a monthly reimbursement toward their personal cellular telephone bill. Per the IRS regulations, such reimbursements are not considered taxable income and are not subject to required tax withholdings.

Employees who do not fall under either of the above categories may submit reimbursement requests for occasional, intermittent business expenses on their personal cellular phone only when the calls result in additional costs that are above and beyond the employee’s normal calling plan (e.g., excess minutes, roaming charges).

Employees who are issued business-owned cellular phones are expected to protect the equipment from loss, damage, or theft. Upon resignation or termination of employment, or at any time upon request, the employee may be asked to produce the phone for return or inspection. Employees unable to present the phone in good working condition may be expected to bear the cost of a replacement.

Employees may place or receive calls using hands-free methods. Because safety is our utmost concern, employees are prohibited from using a mobile device hands-on for placing/receiving calls, text messaging, checking email, or any other uses while driving, whether the communication conducted is personal or business related. For the safety of our employees and others, employees must pull over and stop at a safe location to use a mobile device hands-on. Employees must abide by all cellular/mobile phone laws.

Personal use of cellular phones during work time shall be limited in both numbers of calls and duration, and reserved for important calls or emergencies that cannot be handled during non-work time. Personal calls shall not be made or received when dealing with the public, or in any other way interfere with the proper performance of job duties.

Procedure: Human Resources will determine the positions that have a need for a cellular phone. Human Resources will review and make the final determination prior to a phone being issued or a stipend given to an employee.

Employees issued a business-owned cellular phone can only use the phones for work-related communications. Upon receiving the cell phone, the employee is required to sign a statement of receipt and acceptance of responsibility for corporate cell phones. Supervisors shall review and sign the monthly statement for cell phone holders they supervise and forward it to the Accounting Department. Supervisor signatures indicate that the usage is approved and that the calls were made in accordance with GLCAP policies. Any fraudulent or unauthorized usage shall be immediately pointed out to the Administration & IT Director for further investigation with the cell phone provider.

Failure to comply with any of these policies associated with the use of GLCAP’s corporate cell phones shall be subject to possible revocation of corporate cell phone privileges. The Program Director, with the approval of the President/CEO, shall determine whether cell phones are revoked.
8.26 **Cellular Phones (continued)**

Employees required to obtain a personal cellular phone will be paid a pre-determined reimbursement the first pay period of the month of a bi-weekly payroll. On occasion, the stipend may be received the second pay period of the month of a bi-weekly payroll. Such employees will also provide a copy of their cellular contract agreement to be kept on file.

Employees requesting reimbursement for the occasional, incremental business expense must copy the monthly statement, complete a voucher and submit all documentation to the appropriate supervisor.

Employees are expected to follow this policy regarding personal calls during work time and supervisors are expected to monitor and effectively manage personal use of cellular phones during work time.

8.27 **Personal Property** *(New 05/10/11)*

**Policy:** Employees who bring personal items into work must follow the guidelines specified in this policy, and assume personal responsibility for the security and replacement of the item if lost or stolen. GLCAP is not responsible for the loss, damage or theft of personal belongings.

Employees may not bring into work any personal property that is:

- disruptive or inappropriate for a professional business setting
- a safety risk
- sexually suggestive, offensive or demeaning to specific individuals or groups, or otherwise contrary to GLCAP harassment policy
- contrary to any policy specified in this manual

GLCAP owns all furnishings and equipment on GLCAP property, and therefore reserves the right, at any time, and without notice to inspect the contents of its file cabinets, desks, workstations and other property, used or assigned to employees. Accordingly, an employee should expect no right of privacy as it pertains to personal items stored in, or on GLCAP furnishings and equipment.

GLCAP maintains authority to remove any personal items that violates its rules and policies, and maintains the right to retain such items as long as it is necessary to substantiate misconduct, and document disciplinary action and related challenges.

**Procedure:** Employees are expected to exercise reasonable care to safeguard personal items that are brought to work. Employees are advised not to carry unnecessary amounts of cash or other valuables with them when they come to work. Valuables such as expensive jewelry or other sentimental articles should not be left unattended or unsecured.

8.28 **Public Relations** *(rev. 03/08/16)*

**Policy:** GLCAP strives to promote its reputation as a professional and competent organization, and to maintain the goodwill of the community members it serves. Rudeness or unprofessional behavior toward a client or anyone in contact with GLCAP; insubordination, threatening, intimidating, or disrespectful behavior or assaulting a manager/supervisor, coworker, customer or vendor will result in disciplinary action up to and including termination.

No client or other person will be discriminated against because that person does not speak the English language, or speaks with an accent. GLCAP will make every effort to accommodate such person so to receive the information requested, and services to which that person is otherwise entitled.
8.28 Public Relations (continued)

Workplace diversity is valued and therefore, in situations where a client or member of the general public speaks a language other than English, the employee may speak that language if it is known to the employee. Likewise, when employees are conversing with each other, employees may speak in any language that is known by both employees.

Procedure: Employees are expected to address public complaints or concerns in a helpful, courteous, and professional manner, but within the scope of their delegated authority. If resolution of the complaint extends beyond the employee’s authority, or if the complainant becomes abusive or harassing, the employee is expected to refer the complaint to their supervisor.

8.29 Educational Pursuits (New 05/10/11)

Policy: GLCAP is supportive of employees who pursue personal and professional development through education. However, full-time employment with GLCAP is primary, and personal educational pursuits must not conflict with the employee’s ability to perform job duties to expected performance standards, or is in conflict with the interests and policy of GLCAP.

GLCAP computer equipment, Internet service, e-mail, printers, fax machine, copiers, all equipment, and all materials and supplies are for GLCAP business only and may not be used for an employee’s school work without prior approval from the Director. Likewise, school work shall not be performed during the employee’s paid work time with GLCAP.

Procedure: Employees must submit a written request to the Director prior to using GLCAP computer equipment, Internet service, e-mail, printers, fax machine, copiers, other equipment, or materials and supplies for school work. The Director will review the request and will approve or deny the requested use in writing.

8.30 Bulletin Boards (New 05/10/11)

Policy: GLCAP provides bulletin boards as a means to communicate GLCAP business and information among employees. Bulletin board materials are the property of GLCAP, and are generally used for official GLCAP business only. Personal postings may be permitted, but only with prior permission of the Director or designee.

In general, material may be posted if it does not conflict with the parameters and restrictions specified in this procedure. Materials may not:

- contain a personal attack, or be scandalous or derogatory toward any employee, member of management, the Board of Directors, employee, client, public official, or other person.
- attack, or make unfavorable comments about a candidate for public office
- be morally offensive
- adversely reflect upon the integrity or reputation of GLCAP
- conflict with any policy or procedure adopted by GLCAP.

Federal and State employment notices and other legally required notices shall be posted indefinitely on the bulletin board.

Procedure: An employee may request that material be posted on the bulletin board by submitting the material to the Director or designee for consideration for approval for posting. Postings shall be timely removed by the Director or designee. No other employee is authorized to remove bulletin board postings.
8.31 **Equipment and Supplies**  

**Policy:** GLCAP provides supplies and equipment for business purposes, and employees are accountable for their responsible and proper use. Generally, employees should not have need to bring into work personally owned equipment, software, and supplies, since all items necessary to perform the job are provided by GLCAP. However, in the event that an employee wishes to use a personally owned item on the job, the employee is expected to first gain prior approval from the employee’s supervisor, in writing. GLCAP assumes no responsibility for the security, replacement or maintenance of any personally owned items approved for use on the job.

Employees have an obligation to use GLCAP provided supplies and equipment only for GLCAP purposes. Employees are prohibited from using supplies and equipment for personal benefit, or selling GLCAP property for personal gain, or for the gain or benefit of any other person.

Abuse, neglect, and misuse of GLCAP equipment is prohibited, and employees may be required to pay for supplies and equipment that may be lost or damaged as a result of their negligence or carelessness. Whether, and to what extent, employees will be assessed for such loss or damage are matters that are within the President/CEO’s discretion. In addition, an employee who willfully or carelessly abuses, neglects or misuses equipment or supplies may be subject to disciplinary action, up to and including discharge.

Employees may not use GLCAP letterhead and envelopes for personal correspondence since such use could be construed as an official GLCAP communication. Personalized business cards and other similar materials shall only be issued by GLCAP. Employees may not create and generate their own business cards that depict the employee as a representative of GLCAP.

**Procedure:** Employees must submit a written request to their supervisor if the employee wishes to bring personally owned equipment, software, and supplies from home. The written request should include what the item(s) is and the reason for the request. The supervisor will review the request and approve or deny the request.

If abuse, neglect, or misuse has occurred, the supervisor must contact Human Resources and the Director. The Director and Human Resources will work with the President/CEO to assess damage and determine appropriate action.
SECTION 9
TECHNOLOGY

9.1 IT Acceptable Use  
(New 03/08/16)

Policy: IT’s intention for publishing an Acceptable Use statement is not to impose restrictions that are contrary to GLCAP established culture of openness, trust, and integrity. IT is committed to protecting GLCAP employees and the organization from illegal or damaging actions by individuals, either knowingly or unknowingly.

Internet/Intranet/Extranet-related systems, including but not limited to computer equipment, software, operating systems, storage media, network accounts providing electronic mail, and internet browsing are the property of GLCAP. These systems are to be used for business purposes in serving the interests of the organization and our participants in the course of normal operations. Effective security is a team effort involving the participation and support of every GLCAP employee who deals with information and/or information systems. It is the responsibility of every end-user to know these guidelines, and to conduct their activities accordingly.

General Use
1. While GLCAP network administration desires to provide a reasonable level of privacy, users should be aware that the data they create on the corporate systems remains the property of GLCAP.
2. Employees are responsible for exercising good judgment regarding the reasonableness of personal use.
3. For security and network maintenance purposes, authorized individuals within GLCAP may monitor equipment, systems, and network traffic at any time.
4. Policies, procedures, and statements have been created to address specific electronic tools and/or processes.
5. GLCAP reserves the right to audit networks and systems on a periodic basis to ensure compliance with the IT Acceptable Use Policy Statement and other policies, procedures, and statements.
6. GLCAP reserves the right to block Internet sites that are known and/or have been proven to contain malicious content or malware and have no business use. Malware is defined as software designed to infiltrate a computer system without the owners’ informed consent. Malware includes computer viruses, worms, trojan horses, etc. Evaluation of these sites will be ongoing. If a business use is identified for such a site, the IT staff will deal with the security issues on a case-by-case basis.

9.2 E-Mail  
(rev. 05/10/11)

Policy: The e-mail policy of GLCAP covers the entire GLCAP e-mail system, including: computers, networks, messages, drafts, records, documents and other information including backup media and storage.

The e-mail system’s sole purpose is to assist in conducting GLCAP business. However, personal use of the e-mail system is permitted as long as the employee does not abuse the privilege and the procedures of the job site. The content of any personal e-mail on GLCAP computers shall not conflict with this policy, or any other policy in this manual. GLCAP encourages employees to send/receive any necessary personal messages before or after work, or during breaks.
9.2 **E-Mail (continued)**

All e-mails stored in and accessed through GLCAP computers are the sole properties of GLCAP and therefore are subject to monitoring. Employees should expect no right to privacy pertaining to any e-mail sent or received, stored in or accessed by any GLCAP computer. GLCAP uses programs to monitor employee use of the e-mail systems and to act on any violations of these policies found through use of such programs. GLCAP further examines any and all electronic communications sent or received by employees via the organization’s electronic communications systems. In addition, employees are required to follow the retention guidelines set forth in the Record Retention fiscal policy.

Any views expressed by individual employees in e-mail messages are not necessarily those of GLCAP. Prohibited uses of the organization’s e-mail system include, but are not limited to:

1. Engaging in any communication that is harassing, discriminatory, defamatory, pornographic, obscene, racist, sexist or that evidence religious bias, or is otherwise of a derogatory nature toward any specific person, or toward any race, color, citizenship status, national origin, ancestry, gender, sexual orientation, age, religion, creed, qualified mental or physical disability, marital status, veteran status, political affiliation, military status, employee and family genetic information or any other factor protected by law.
2. Forwarding and/or printing pornographic, profane, discriminatory, threatening or otherwise offensive material from any source including, but not limited to, the Internet.
3. Engaging in any communication that is in violation of federal, state or local laws.
4. Promoting any religious belief.
5. Sending, forwarding, redistributing or replying to chain letters.
6. Advertising, solicitation, or other commercial, non-programmatic use.
7. Knowingly introducing a computer virus into the organization’s communication system or otherwise knowingly causing damage to the organization’s systems.

Confidential or sensitive information, transmitted over the e-mail system, must be transmitted with caution to ensure that it is sent to only the authorized party, minimizing the risk of disclosure to unauthorized parties inadvertently or purposefully intercepting the message.

Violation of this policy may result in immediate revocation of system privileges and/or disciplinary action up to and including termination. If warranted, GLCAP will advise appropriate legal officials of any suspected illegal violations.

**Procedure:** To protect from the potential of computer viruses, employees should not open e-mail if the employee does not recognize the sender’s name, subject, or type of attachment. If an employee inadvertently opens an e-mail with a suspected virus, the employee is expected to immediately notify the Information Technology Department so that security measures can be taken to protect the integrity of GLCAP hardware and software.

Employees should refer to the Information Technology Department for training, questions, and/or issues that may arise while utilizing the e-mail system. Suspected violations of this policy should be immediately and confidentially reported to the employee’s supervisor.

Employees are expected to follow the Record Retention policy in the GLCAP Fiscal Policies and Procedures for all emails contained in any folders within the email system and any archives.
Policy: Access to the Internet has been provided to GLCAP employees for the benefit of the organization and its customers. It allows employees to connect to information resources around the world. All employees have a responsibility to maintain and enhance GLCAP public image, and to use the Internet in a productive manner.

GLCAP Internet access shall not be used for personal gain or advancement of individual views. Solicitation of non-company business, or any use of the GLCAP Internet for personal gain is strictly prohibited, and use of the Internet must not disrupt the operation of the GLCAP computer network.

Use of the Internet through the GLCAP computer network constitutes the individual’s acceptance of this policy. Violations of any guidelines listed may result in immediate revocation of system privileges and/or disciplinary action up to and including termination. If necessary, GLCAP will advise appropriate legal officials of any suspected illegal violations. To ensure that all employees are responsible, productive Internet users and are protecting the organization’s public image, the following guidelines have been established for using the Internet:

- **Ethical Use of Internet:** Employees who utilize the Internet are representing GLCAP. All communications should be for professional purposes only. Employees are responsible for seeing that the Internet is used in an effective, ethical, and lawful manner. Employees are prohibited from accessing the Internet for any unethical purposes, including pornography, violence, gambling, racism, harassment, or any illegal activity. Employees are forbidden from using profanity or vulgarity when posting electronic mail via the Internet or posting to public forums (i.e., newsgroups). Any electronic mail sent through or postings to public newsgroups must fall within these ethical standards.

  Employees must abide by all federal, state and local laws with regard to information sent and retrieved through the Internet. Employees must abide by the GLCAP Standards of Conduct Policy when utilizing the Internet or any other electronic communication.

- **Personal Use:** Limited personal use of the Internet is allowed by GLCAP. However, employees are reminded that use of any and all GLCAP property is primarily for the purpose of GLCAP business. Any personal use of the Internet is expected to be on the user’s own time and is not to interfere with the person’s job responsibilities. Employees are prohibited from accessing the GLCAP Internet for unethical purposes or in any manner that conflicts with this or any other policy in this manual.

- **Downloading Software:** Employees are prohibited from downloading software from the Internet without prior approval from the Information Technology Department. Downloading of games, screen savers, and wallpapers from the Internet are strictly prohibited. Upon approval, employees should take extreme caution when downloading software or files from the Internet. Failure to follow these guidelines could result in corruption or damage to files and/or unauthorized entry into GLCAP network. It is mandatory that employees comply with copyright and trademark laws when downloading material from the Internet.
9.3 Internet (continued)

- **Security**: All files and information stored in, or accessed by any GLCAP computer including Internet sites and files accessed, electronic folders and files, and any or all information stored or accessed on GLCAP computers are the sole properties of GLCAP and are subject to monitoring. Therefore, employees should expect no right of privacy pertaining to any file stored on, or accessed by any GLCAP computer. All electronic communications should be considered public information. GLCAP monitors all messages and files on the network as deemed necessary and appropriate. Internet messages are public communications and are not private. All communications including text and images can be disclosed to law enforcement or other third parties without prior consent of the sender or the receiver. GLCAP uses programs that monitor employee use of the Internet and to act on any violations of these policies found through use of such programs. GLCAP further examines any Internet sites viewed by employees via the organization’s electronic communication systems.

**Procedure**: Contact the Information Technology Department for training, questions, and/or issues that may arise while utilizing the Internet. Suspected violations of this policy should be immediately and confidentially reported to your immediate supervisor.

9.4 Bring Your Own Device (BYOD)

**(rev. 03/09/21)**

**Policy**: Employees have the opportunity to use their personally owned device to access corporate information for their convenience based on business necessity. Devices include desktops, laptops, tablets, and smartphones. GLCAP reserves the right to revoke the access if the policy and procedure is not followed.

No employee should expect any privacy except that which is governed by law. GLCAP has the right, at any time, to monitor and preserve any communications that utilize the GLCAP network in anyway, including data, voice mail, telephone logs, internet use, network traffic, etc. to determine proper utilization. GLCAP reserves the right to review, retain, or release personal and agency-related data on personal devices to government agencies or third parties during an investigation or litigation.

To ensure there are no interruptions to business operations, no unplanned downtime for multiple users, and/or no data breaches releasing organization and/or client data to unauthorized parties as a result of employees using personal devices to access GLCAP electronic data, the end user must adhere to the following:

1. The end user must ensure that the device is properly protected against viruses, spyware, or malware infection, as well as have the device password protected.
2. The end user must ensure that the device does not have third-party software or applications that pose a threat to the organization’s systems, or those that could result in application incompatibilities.
3. The end user must agree to only use the device for email or designated web-based applications and will not attempt to access any other corporate data.
4. The end user must agree to immediately notify the IT department if their device has been infected with a virus, spyware infection, malware threat, or might be otherwise compromised. Additionally, the end user must immediately notify the IT department if their device has been lost or stolen.
9.4 Bring Your Own Device (BYOD) (continued)

5. The end user must agree not to discard any previously used devices until the IT department has ensured that all traces of the corporation’s data have been deleted from the device.

6. The end user must agree, if in a non-exempt position, that information will not be accessed during non-work hours.

The IT staff is not responsible for troubleshooting individual device incompatibility issues with the organization’s systems. The IT staff will ensure appropriate security measures are in place, including device remote wipe, to protect corporate data. GLCAP is not liable for any issues that the end user may sustain on their device from viruses, spyware, malware, or inappropriate use of the device.

Procedure: Employees must contact the IT department regarding questions on access. The IT staff has the right to contact the employee’s supervisor for access approval.

9.5 Workplace Social Networking

Social media, professional networking sites, rapid-fire communications, blog sites, and personal Web sites are all useful technologies when used for learning, collaboration and to build productive relationships. Because employees have opportunities to express and communicate online in so many ways, whether while at work or during non-working time, everyone must use good judgment on what material makes its way online. For example, social media represents a significant risk to information security, being both a heavily targeted resource for malware/hacking and a place where corporate data is inadvertently leaked. This policy will set forth guidelines that employees must follow for all online communications that effect or relate to GLCAP.

This policy should not be interpreted to restrict or interfere with employee’s legal rights, free speech, or whistleblower protections.

Relevant Technologies - Includes (but is not limited to) the following specific technologies: Personal blogs; LinkedIn; Twitter; Facebook; Personal Web sites; and other similar sites.

Responsibility

GLCAP employees are personally responsible for the content that they publish using the technologies described above. Therefore, you must at all times maintain professionalism, honesty, and respect. If you identify yourself as an employee of GLCAP, you can be viewed as a representative of the organization; therefore, you must always write in the first person and make it clear that you are speaking for yourself and not on behalf of GLCAP. When GLCAP wishes to communicate publically as an organization it has well established means of doing so. Only those individuals designated by GLCAP have authorization to speak on behalf of the organization.

In addition to compliance with the Topic Matter Guidelines below, it is critical that you show proper respect for the laws governing copyright, fair use of copyrighted material owned by others, trademarks and other intellectual property, including GLCAP own copyrights, trademarks and brands. You must always exercise good judgment and common sense in the topics discussed and be mindful of copyright, privacy and financial disclosure laws.
9.5 Workplace Social Networking (continued)

Topic Matter Guidelines

When communicating as an employee of GLCAP, the matters discussed must be relevant to your area of responsibility or expertise. As stated below in the Off Limits Material section of this policy, in no circumstance is it permissible to provide GLCAP or another’s confidential or other proprietary information or report on conversations that are meant to be private or internal to GLCAP. Do not cite or reference clients, partners, public entities or other employees without their permission.

In addition, you must always apply a "good judgment" test for every activity related to GLCAP: Could you be guilty of leaking information, trade secrets, customer data, or upcoming announcements? Is it negative commentary regarding GLCAP? Activity showing good judgment would include statements of fact about GLCAP and its services, facts about already-public information, or information on the GLCAP Web site. Always try to provide worthwhile information and a positive perspective.

Further, if any employee becomes aware of social networking activity that would be deemed distasteful or fail the good judgment test, please contact the Human Resource department.

Organization Assets

Users accessing social media systems must do so with a compliant system, specifically running up-to-date enterprise anti-malware technology; patched and up-to-date operating system, browser, and associated applications; using a corporate supported browser, specifically Internet Explorer or Mozilla FireFox; the system must pass through a web security system, providing content filtering for malicious content and blocking of known bad sites. GLCAP uses programs that monitor employee use of the Internet.

As stated in the Internet Policy, limited personal use of the Internet is allowed by GLCAP, including social media. However, employees are reminded that use of any and all GLCAP property is primarily for the purpose of GLCAP business. Any personal use of the Internet is expected to be on the user’s own time and is not to interfere with the person’s job responsibilities. Employees are prohibited from accessing the GLCAP Internet for unethical purposes or in any manner that conflicts with this or any other policy in this manual.

Relation to Harassment Policy

Every person who is employed by GLCAP is entitled to work in an environment free from the demoralizing effects of harassment or unwelcome offensive or improper conduct. As expressed more fully in other GLCAP employment policies, harassment based on race, gender, color, religion, national origin, age, sexual orientation, gender identity or expression, disability, or veteran status or any other status protected by law is not tolerated at GLCAP. These policies apply at all times to your use of the social networking technologies described above.

While it is impossible to provide a complete list of the types of improper behavior, statements, postings, and other conduct prohibited by the employment policies described in the preceding paragraph when using the social networking technologies described above, they include unwelcome sexual comments or personal references, requests for sexual favors, obscene language, displaying sexually graphic material magazines, sexually explicit, racially offensive or derogatory statements, postings and materials.
9.5 Workplace Social Networking (continued)

**Off-Limits Material** – Misuse or unauthorized disclosure of confidential information not otherwise available to persons or firms outside GLCAP is cause for disciplinary action up to and including termination. The following items are deemed off-limits for social networking:

- **Intellectual property, trade secrets, or customer data**
  
  GLCAP intellectual property, trade secrets, and customer identities and data are strictly forbidden from any online discourse except through mechanisms managed internally by GLCAP public relations department.

**Online Recommendations/References**

Some sites, such as LinkedIn, allow members to recommend current or former co-workers for employment. GLCAP forbids employees to participate in employee recommendations/references for reasons of company liability. All communication of this type should be referred to Human Resources.

**Financial Information**

Any online communication regarding the company's financial data is strictly forbidden except through mechanisms managed internally by GLCAP public relations department.

**Company-sensitive matters**

Any online communication regarding proprietary information such as layoffs, strategic decisions, or other announcements deemed inappropriate for uncoordinated public exchange is forbidden.

**Violation of Policy**

GLCAP may ask an employee to discontinue any activity perceived by GLCAP to be in conflict with an employee’s employment or that is reasonably deemed to not be in the best interests of GLCAP, its programs, its employees, or its clients.

Employees must promptly report incidents of harassment that occur in the use of the social networking technologies described above to their immediate supervisor or a higher level of management. All reported incidents of harassment, questions and concerns will be addressed promptly and investigated. Any employee who, in good faith, reports a possible violation of this policy will be protected from any form of retaliation.

Employees who participate in online communication deemed in violation of this policy will be subject to disciplinary action up to and including termination.

**Procedure:** Suspected violations of this policy should be immediately and confidentially reported to Human Resources.
9.6 Passwords

Policy: Employees at GLCAP must access a variety of IT resources, including computers and other hardware devices, data storage systems, and other accounts. Passwords are a key component of IT’s strategy to ensure only those authorized can access resources and data.

All employees who have access to any of these resources are responsible for choosing strong passwords and protecting their log-in information. Employees may never share their passwords with anyone else in the company, including co-workers, managers, administrative assistants, IT staff members, etc. Your password is a digital signature. Everyone who needs access to a system will create their own unique password.

Procedure:

Password creation

- All passwords should be reasonably complex and difficult for unauthorized people to guess. Employees should choose passwords that are at least eight characters long and contain a combination of upper- and lower-case letters, numbers, and punctuation marks and other special characters.
- Employees should also use common sense when choosing passwords. They must avoid basic combinations that are easy to crack. For instance, choices like “password,” “password1” and “Pa$$w0rd” are equally bad from a security perspective.
- A password should be unique, with meaning only to the employee who chooses it. That means dictionary words, common phrases and even names should be avoided. One recommended method to choosing a strong password that is still easy to remember: Pick a phrase, take its initials and replace some of those letters with numbers and other characters and mix up the capitalization. For example, the phrase “This may be one way to remember” can become “TmB0WTr!”.
- Employees must choose unique passwords for all of their company accounts, and should not use a password that they are already using for a personal account.
- All passwords must be changed regularly, with the frequency varying based on the sensitivity of the account in question. This requirement will be enforced using software when possible.
- If the security of a password is in doubt— for example, if it appears that an unauthorized person has logged in to the account — the password must be changed immediately.
- Default passwords — such as those created for new employees when they begin employment or those that protect new systems when they are initially set up — must be changed as quickly as possible.

Protecting passwords

- Employees must refrain from writing passwords down and keeping them at their workstations. See above for advice on creating memorable but secure passwords.
- Employees may not use password managers or other tools to help store and remember passwords without IT’s permission.
SECTION 10
DISCIPLINE

10.1 Discipline

Policy: Employees are expected to conduct themselves in accordance with GLCAP policies and to perform their jobs to expected performance standards. Employees are normally advised of expected job behavior and conduct through these policies, performance reviews, memos, directives and other means. However, employees are expected to seek answers to their questions regarding expected standards of performance and conduct prior to taking action or before making decisions that might violate policy or performance standards.

Employment with GLCAP is at-will; therefore employees may be terminated with or without cause or prior notice. However, unacceptable behavior or performance, which does not lead to immediate dismissal, may be dealt through application of discipline with the intent of giving the employee opportunity to work to expected standards. Whether this opportunity is given is at the sole discretion of GLCAP, in consideration of various facts and circumstances.

When disciplinary measures are used, they may include verbal warnings, written reprimands and suspension without pay. In general, these forms of discipline are administered to correct misconduct or when an employee does not meet job requirements. They may be administered in any order, based on facts and circumstances, or may be repeated or omitted altogether.

Disciplinary measures are listed below in order of severity, however, this does not imply, nor should it be construed that these disciplinary measures must be applied in sequential order.

**Verbal Warning:** A verbal cautioning and instruction. A record of the disciplinary action, with the employee’s and supervisor’s signatures, will be placed in the employee’s file.

**Written Reprimand:** A written disciplinary action prepared by a supervisor and Human Resources which summarizes the employee’s behavior or performance problem, provides instruction, and includes a warning that performance or conduct must improve to expected standards. Both the employee and supervisor sign the Written Reprimand, and the document is placed in the employee’s file.

**Suspension Without Pay:** Suspensions vary in length and must be approved by the Human Resource Director. A record of the suspension is signed by both the employee and supervisor, and the document is placed in the employee’s file.

The supervisor in collaboration with Human Resources will determine whether or not performance or conduct issues are addressed through the employment-at-will doctrine, or through application of corrective disciplinary action, as appropriate to the situation and seriousness of the offense. GLCAP always reserves the right to terminate employment at any time, with or without reason or prior notice.

In addition to terminating an employee, GLCAP reserves the right to prosecute any employee for any misconduct that constitutes a criminal or civil offense.

**Disciplinary Authority:** Discipline and decisions to terminate employment shall be made only by those persons so delegated the authority. GLCAP delegates to supervisors the authority to administer verbal warnings, written reprimands, and suspensions in collaboration with Human Resources. Human Resources in consultation with the President/CEO has the authority to approve a termination from employment.
10.1 Discipline (continued)

**Procedure:** Supervisors are responsible for the day-to-day monitoring of employee conduct and performance and for ensuring compliance with expected standards. In the event that a supervisor observes or otherwise learns of a violation of these policies or performance standards, it is appropriate for the supervisor to meet with the employee informally to discuss the situation and coach the employee on expected performance or conduct standards. The meeting should be documented and placed in the supervisor file for reference later if needed.

**Verbal Warnings & Written Reprimands:** When a verbal warning or written reprimand is contemplated, the supervisor is required to notify Human Resources. The Director and other management persons in the supervisory line of authority should also be conferred with as appropriate. In collaboration with Human Resources, the supervisor will complete the Discipline Notice form. Human Resources will review and approve the use of Discipline Notice form prior to meeting with the employee to discuss the disciplinary action. Human Resources and the Supervisor will schedule a meeting with the employee to discuss the disciplinary action. A copy of the Discipline Notice will be given to the employee, one retained for the supervisor file and the original placed in the employee’s personnel file.

**Suspensions and Terminations:** The supervisor will contact Human Resources to discuss the facts and circumstances, and determine the appropriate level of discipline. The Director and other management persons in the supervisory line of authority should also be conferred with as appropriate. As appropriate to the situation, the employee may be placed on administrative leave, pending an investigation or determination of appropriate disciplinary action.

In collaboration with Human Resources, the supervisor will complete the Discipline Notice form for a suspension. Human Resources will review and approve the use of Discipline Notice form for a suspension prior to meeting with the employee to discuss the disciplinary action.

For suspensions, Human Resources and the supervisor will meet with the employee to discuss the offense, dates of the suspension, expected standards and other matters related to the situation. A copy of the Discipline Notice form should be given to the employee, one retained for the supervisor file and the original sent to Human Resources.

Human Resources in collaboration with the President/CEO will prepare an Employee Termination Form or termination letter prior to meeting with the employee to discuss the termination. For terminations, Human Resources and the supervisor will meet with the employee to inform the employee of the decision and to collect GLCAP property in possession of the employee. Following the meeting, the employee will not be permitted to return to his work station other than to pick up personal belongings, while being monitored. A copy of the Employee Termination Form or termination letter should be given to the employee, one retained for the supervisor file and the original sent to Human Resources.

All discipline forms including Employee Termination forms and termination letters shall be reviewed by the supervisor for possible comment and revision prior to meeting with the employee.

**Employee Acknowledgement and Signature:** For each disciplinary action [except terminations] the employee will be asked to sign the discipline form following the disciplinary conference to acknowledge that the discipline was reviewed with the employee and confirm understanding and agreement to work to expected performance standards. The employee may make comments on the form in the appropriate section, but may not strike out or otherwise deface the form.
10.1 Discipline (continued)

Refusal of the employee to sign the discipline form does not in any manner diminish that the Discipline Notice form is an official document of GLCAP and that it may be the basis of, or considered part of, any employment decision.

Corrective Action Plan: Is designed to facilitate constructive discussion between a staff member and his or her supervisor and to clarify the work performance to be improved. A corrective action plan may be used to correct misconduct or when an employee does not meet job requirements. Any time a corrective action plan is used, an employee will receive a written plan of corrective action. Following review of the plan, the employee is required to sign the plan as a condition of continued employment. Refusal to sign a written plan of corrective action will mean the employee has elected to not follow GLCAP standards of employment and has therefore elected to voluntarily resign.

A Corrective Action Plan may be used in conjunction with a suspension. In this case the employee will be informed to report directly to Human Resources at an appointed date and time upon returning from the suspension, and prior to starting work. The suspended employee will be given a written plan of corrective action upon returning to work. After reviewing the plan and expectations with the employee, the employee will be required to sign the plan as a condition for returning to work. Failure to agree to sign the plan of corrective action will mean the employee has elected to not follow GLCAP standards of employment, and has therefore elected to voluntarily resign.

10.2 Administrative Leave

Policy: The supervisor, with approval of the Director, may place an employee on administrative leave with pay pending a disciplinary investigation, the determination of discipline, or when the health or safety of an employee, or of any person or property entrusted to the employee’s care could be adversely affected by the employee remaining on the job. Prior to deciding to place an employee on administrative leave, the Director shall confer with Human Resources and the President/CEO for guidance and direction.

When placed on administrative leave, the employee shall be compensated in an amount equal to the employee’s regular rate of pay for all hours the employee would have normally been scheduled to work. The length of the leave shall be determined by facts and circumstances, and will depend upon the duration of an investigation, or the duration needed to determine whether disciplinary action is appropriate. When placed on administrative leave, the employee will be expected to follow all instructions required by GLCAP.

Procedure: The Director in collaboration with Human Resources and the President/CEO will determine when an administrative leave is appropriate. If appropriate, Human Resources and the Director or designee will meet with the employee to place the employee on administrative leave.

Upon return from administrative leave, Human Resources and the Director or designee will meet with the employee to discuss the outcome of the investigation and take appropriate action as necessary.
SECTION 11
DISPUTE RESOLUTION PROCEDURES

11.1 Dispute Resolution Process

Policy: Concerns, misunderstandings and frustrations may arise in the workplace. It is GLCAP’s intent to be responsive to its employees and their concerns. Therefore, an employee who is confronted with a concern may use the Dispute Resolution Process to request review of actions taken which include working condition complaints, improper deductions from pay, and disciplinary action. This process provides a method for employees to present his or her concerns to management and have those concerns internally resolved.

Employees are responsible for following the established steps in the Dispute Resolution Process.

If the employee fails to meet the required time limits, or the steps are not followed as defined, the dispute will be dismissed and the dispute will be considered to be settled as of the resolution given by management in the prior step.

An employee will not be subject to discipline, harassed, retaliated against, or dealt with in an unfair manner as a result of filing a complaint or testifying in a complaint conference.

GLCAP believes that most complaints can be appropriately resolved through this policy and procedure. However, in the event that an employee believes it to be necessary to file an appeal through any regulatory agency, the employee will be denied the remedy of this policy and procedure, and any complaints filed prior to the appeal shall be considered withdrawn.

Procedure: Not all complaints or disagreements need to proceed through this policy. Employees are encouraged to initially talk informally with their supervisor to address workplace concerns prior to filing a formal complaint.

Employees should complete the Dispute Resolution Report form and submit the form following the established steps in the Dispute Resolution Process.

Upon receiving the Dispute Resolution form, the supervisor shall inform Human Resources, each of the supervisors in the chain of command, and the Director. With Human Resources, the supervisor is expected to review the complaint objectively, investigate the situation and provide an appropriate written response. Responses are to be based upon objective evaluation of the situation and consideration to policy and must be reviewed and approved by Human Resources.

Supervisors are expected to adhere to the stated timeframes for responding to the complaint. However, if a complaint cites issues of law that the supervisor cannot address, the supervisor, with concurrence from the Director and Human Resources, may elect to forward the complaint to GLCAP legal advisor before proceeding. All time limits shall be in abeyance until a response from the legal advisor is received.

The chart below sets forth timeframes for filing and responding to a complaint. Complaints relating to issues of health and/or safety shall be expedited through the levels of the procedure as quickly as responsibly feasible.
<table>
<thead>
<tr>
<th>Step</th>
<th>Submit Dispute Resolution Process Form</th>
<th>To Whom</th>
<th>Supervisor Conducts Meeting With Disputant</th>
<th>Supervisor Provides Written Response To Disputant &amp; Next Level Supervisor</th>
<th>Resolved</th>
</tr>
</thead>
<tbody>
<tr>
<td>Step 1</td>
<td>5 working days from dispute</td>
<td>Immediate Supervisor</td>
<td>10 working days from receipt of the dispute</td>
<td>5 working days from dispute resolution meeting</td>
<td>Yes - end</td>
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<td>No - next step</td>
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<tr>
<td>Step 2</td>
<td>5 working days from previous response</td>
<td>Next level supervisor, using same time table until it reaches the Director or his/her designee</td>
<td>10 working days from receipt of the dispute</td>
<td>5 working days from dispute resolution meeting</td>
<td>Yes - end</td>
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<td>No - next step</td>
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<tr>
<td>Step 3</td>
<td>5 working days from previous response</td>
<td>President/CEO or his/her designee</td>
<td>20 working days from receipt of the dispute</td>
<td>10 working days from dispute resolution meeting</td>
<td>Yes – end</td>
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<td>Decision final</td>
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SECTION 12
SEPARATION

12.1 Termination

Policy: The employment relationship between GLCAP and all of its non-bargaining unit employees is an employment-at-will relationship. Both the employee and the employer have the right to terminate the employment relationship at any time for any reason, or for no reason at all. GLCAP prefers, but does not require that employees provide prior notice.

Procedure: GLCAP will notify the employee of the decision to terminate employment in writing. Policy Council or Policy Committee must approve discharges for Early Childhood Program employees.

When an involuntary termination from employment is contemplated, the employee’s supervisor is expected to discuss the potential termination with Human Resources. Human Resources in collaboration with the Director and President/CEO will determine if termination is warranted. With the concurrence of the Director and President/CEO, the employee’s supervisor, with Human Resources present, notifies the employee verbally and in writing of the termination. The supervisor shall collect all GLCAP property in the employee’s possession, as illustrated in the policy titled Exit Procedure.

Employees in Range 1-4 positions who wish to resign are requested to give at least 2 weeks notice prior to the effective date of resignation or when changing positions within these Ranges. Employees in Range 5-9 positions who wish to resign are requested to give at least 4 weeks notice prior to the effective date of resignation or when changing positions within these Ranges.

If an employee plans to retire, GLCAP requests that a notice be given as far in advance as possible, as soon as the employee knows of the date of retirement. Notices of resignation or retirement should be in writing and should include a statement indicating the employee's intention to separate from service, the date the notice was given, the effective date of separation, and the employee's signature. The letter of resignation or retirement shall be submitted to Human Resources to be retained in the employee's personnel file.

On or before the employee’s last day of work, Human Resources will provide an Exit Interview form for completion.

Upon separation from employment for any reason, an employee will be paid any credited but unused vacation within 30 days of separation.

12.2 Disability Separation

Policy: When an employee becomes physically or mentally unable to perform essential duties of his position and, except for the disability as defined by the ADA is otherwise qualified to perform essential job duties, the employee may request a reasonable accommodation. In the event that a reasonable accommodation is not available or is denied because it would create an undue hardship on GLCAP, the employee may apply for a voluntary disability separation.

A voluntary disability separation occurs when the employee does not dispute the inability to perform essential job duties of his position because of a disabling illness, injury or condition. A voluntary disability separation may be requested by the employee when the employee is declared physically or mentally incapable of performing the duties of his position by a licensed physician.

An employee requesting a disability separation may be required to submit to a medical or physical examination as provided for in these policies.
12.2 Disability Separation (continued)

In the event that the employee is unable or unwilling to admit a physical or mental incapacity which precludes the employee from performing essential job duties, GLCAP may require that the employee submit to a medical or psychological examination, as provided for in these policies. When results of the examination confirm that the employee is unable to perform essential job functions, the employee may be disability separated from employment.

**Procedure:** An employee requesting disability separation must notify Human Resources in writing with documentation from the treating physician declaring the employee’s incapability of performing the duties of his position. Human Resources will review the request with the Director.

If the examination supports the employee’s request, the disability separation will be approved. If the medical examination does not support the request, the Director shall not approve the disability separation and shall either direct the employee to work or schedule a medical or physical examination as provided for in these policies. Upon separation from employment for any reason, an employee will be paid any credited but unused vacation within 30 days of separation.

12.3 Exit Procedure

**(rev. 03/08/16)**

**Policy:** When employment is terminated with GLCAP through voluntary resignation or retirement, Human Resources will provide an exit interview form for completion on or prior to the employee’s last day of work. Input provided by the employee in the exit interview form will not be a factor in determining eligibility for re-employment, nor will it be considered when giving job references to prospective employers.

Any GLCAP property issued, such as Personnel Policies and Procedures handbook, ID badge, keys, cell phone, computer equipment, electronic files, credit cards and other property must be returned to the employee’s supervisor. All personal charges must be paid before the last day of employment.

**Procedure:** For voluntary resignations, Human Resources shall email an exit interview form to the employee prior to the employee’s termination date.

Supervisors are responsible for ensuring all GLCAP property is returned on or prior to the termination date. Outstanding personal charges must be paid upon termination.

In the event employment is terminated with GLCAP without prior notification, Human Resources shall send a letter requesting the employee return all GLCAP property and pay all personal charges owed to GLCAP.

The supervisor must initiate and submit a termination action through Kronos upon receipt or notice of separation to document the termination.

12.4 Insurance Conversion Privileges

**(rev. 04/12/11)**

**Policy:** According to the federal Consolidated Omnibus Budget Reconciliation Act (COBRA), in the event of an employee’s termination of employment with GLCAP or loss of eligibility to remain covered under the group health insurance program, the employee and eligible dependents may have the right to continued coverage under the health insurance program for a limited period of time at their own expense.

**Procedure:** Human Resources will send COBRA information upon loss of benefits. Employees are responsible for returning the COBRA election form within the required timeframe and for submitting monthly premium payments.
SECTION 13
ILLINOIS

13.1 Victims’ Economic Security and Safety Act Leave (VESSA)

Policy: The Victims’ Economic Security and Safety Act (“VESSA”) provides an employee who is a victim of domestic or sexual violence, or who has a family or household member who is a victim of domestic or sexual violence, with up to four (4) weeks of unpaid leave per any twelve (12) month period to address issues arising from domestic or sexual violence.

GLCAP will not discriminate against any employee as a result of approved use of VESSA leave. An employee cannot engage in employment anywhere while on leave with GLCAP and cannot engage in any activities inconsistent with his/her leave.

Procedure: To request a leave, email Adrienne Fausey at anfausey@glcap.org and include VESSA Leave in the subject line at least 48 hours’ in advance except where it is not practicable to provide such notice. You must include a certification of domestic violence indicating the leave is to address domestic violence.

An employee may take VESSA leave to:

1. Seek medical attention for, or recovery from, physical or psychological injuries caused by domestic or sexual violence to the employee or employee’s family or household member;
2. Obtain victim services for the employee or employee’s family or household member;
3. Obtain psychological or other counseling for the employee or the employee’s family or household member;
4. Participate in safety planning, including temporary or permanent relocation or other actions to increase the safety of the victim from future domestic or sexual violence; or
5. Seek legal assistance to ensure the health and safety of the victim, including participating in court proceedings related to the violence.

VESSA leave may be taken intermittently or on a reduced work schedule.

A certification from the employee indicating the purpose of the leave (1 to 5 above) and upon obtaining such documents the employee shall provide:

1. Documentation from a victim services organization, attorney, member of the clergy, or medical or other professional from whom the employee or the employee’s family or household member has sought assistance;
2. A police or court record; or
3. Other corroborating evidence. Employers must maintain the confidentiality of all information pertaining to the use of VESSA leave, notice of an employee’s intention to take VESSA leave, and certification provided by the employee.