

FAMILYMEANS POLICY

E. SERVICE DELIVERY

E.4. TITLE: Confidentiality of Private Data Policy

POLICY: The identities of all clients and any data collected about them are kept confidential by all board members, employees, student interns and volunteers of FamilyMeans. Breaches of confidentiality are grounds for disciplinary action up to and including termination of association with FamilyMeans.

PROCEDURES:

- E.4.01.** The identity of any person seeking services is private information and may not be released to anyone without written permission of the client. The exception is a health or life threatening situation where appropriate persons may be informed without permission of the client.
- E.4.02.** The confidentiality of data is addressed by the Access to Information Policy and Procedures (See E.3.)
- E.4.03.** Conversations regarding clients must be in the context of appropriate supervision, employee meetings and work related circumstances. Because inadvertent violations of confidentiality often occur during casual conversations in the office or away from work, every effort must be made to avoid being overheard or relating private data in casual settings.
- E.4.04.** Confidentiality will be defined and discussed at the orientation of all Board members, employees, student interns and volunteers. Board members, employees, volunteers and student interns will sign an agreement to honor confidentiality.
- E.4.05.** All EAP client companies receive a quarterly utilization bill which includes only the number of sessions provided and the number of employees seeking assistance. No identifying information is provided to the employer without a signed release of information from the employee. Types of services used during the year are provided on a yearly basis when requested by a company and when staff size is sufficient to maintain confidentiality, i.e. staff employed exceeds 50 employees.

CROSS REFERENCE: **Statement of Information Practices – (HIPAA)**
Security Policies

Policy Approved: February 23, 1998, February 24, 2003
Policy Reviewed: Nov. 27, 2006, 4/19/10, 7/28/2014, September 2018
Policy Revised: _____
Legal Statutes: _____
Expert Review: Legal review 11/10

**FAMILYMEANS
POLICY**

C. PERSONNEL

C.6. TITLE: Grievances and Concerns Policy

POLICY: Employees, contractors, and volunteers have a right to express any grievances or concerns.
A grievance procedure is established to provide a mechanism for the prompt resolution of grievances, concerns or problems affecting employees, contractors, or volunteers.

PROCEDURES:

Employees, contractors, and volunteers will be made aware of where to access the FamilyMeans Policy Manual and thus have access to Grievance and Concerns Policy.

- C.6.01.** Grievances will be handled in the most confidential manner possible. It is the expectation of the agency that when a conflict or a misunderstanding occurs, the employee/contractor/volunteer will make every effort to resolve the concern directly with the person or persons involved. If those efforts do not resolve the disagreement the employee/contractor/volunteer may choose to ask a supervisor or member of the management team to facilitate a meeting of the persons involved in the disagreement. If the disagreement continues to be unresolved, the employee/contractor/volunteer may choose to file a formal grievance.
- C.6.02.** The grievance will be put in writing and appealed to the President. The President will meet with those involved to attempt to resolve the situation in a reasonable time period. The volunteer will be informed of the resolution in writing within a reasonable time. A record of the final resolution and outcome of the grievance will be entered into the employee/contractor/volunteer's file. The information to be recorded in the file will include:
- a. name of complainant
 - b. supervisory relationship
 - c. facts and details regarding the issue and applicable policies
 - d. efforts to resolve the complaints
 - e. the conclusion.
- C.6.03.** Employees/contractors/volunteers have the opportunity to appeal the President's decision by taking their grievance to the Executive Committee of the Board. The President will keep the Executive Committee of the

FAMILYMEANS POLICY

A. AGENCY GOVERNANCE

A.3. TITLE: Conflict of Interest

POLICY: High standards of ethical conduct are adhered to in governance and operation of the agency to ensure that Board personnel, consultants, volunteers, donors or employees are not in a position of conflict of interest or have the appearance of conflict of interest and do not use their agency relationship for personal gain. Directors must act to preserve and enhance public trust in the agency by putting the interests of the agency ahead of all other business and personal interests.

Any Board member who individually or as part of a business or professional firm or who has a family member that has interests related to a business transaction or current professional service of the agency shall disclose this relationship and shall not participate in the vote on a decision taken in respect to such transactions or services. In a similar fashion, any staff member, donor, volunteer or consultant who individually or as a member of a business or professional firm or who has a family member that has interests related to a business transaction or current professional service of the agency shall disclose such relationships to the President or the Board Chair so that appropriate actions may be taken if necessary.

A member of the agency's Board of Directors may not be employed by the agency and they may not receive payment for services as a consultant to the agency. During the selection of potential board members all of their current and/or past relationships with the agency will be reviewed to ensure that conflict of interest does not exist.

Members of the board of directors, employees, donors, consultants, volunteers, or members of their families will not receive any preferential access to agency services.

The agency will not accept fees or any other remuneration from agencies or individuals in return for client referrals.

The agency will not pay other agencies or individuals for the referral of clients.

Agency clients or applicants for services may not be directly referred or steered to the private, professional practice of any employee or board member.

FamilyMeans and Financial Solutions prohibits financial incentives to Financial Counselors based on the number of Debt Management Programs that the counselor establishes.

PROCEDURES:

- A.3.01.** Board members, the agency President, and the management team will be asked to review and sign the form entitled Annual Statement Concerning Possible Conflict of Interest at the time of orientation for new directors and new management staff and on an annual basis thereafter. These conflicts will be shared with the full Board of Directors.
- A.3.02.** Employees will not provide services, similar to those provided by FamilyMeans, in the geographical area served by FamilyMeans.
- A.3.03.** Full time employees must disclose in writing to their supervisor the nature and extent of paid work being done outside of FamilyMeans. The agency expects that full time employees will remain accessible and flexible to fulfill the requirements of their job descriptions. No employees, part-time or full-time, shall engage in outside work, whether paid or not, that:
- a) detracts from the employee's job performance during normal working hours at FamilyMeans;
 - b) utilizes agency office, materials or personnel;
 - c) results in a product (such as a curriculum or publication) that competes with any product of FamilyMeans;
 - d) might lead to disclosure of Agency confidential information;
 - e) might impair the employee's independent judgment on behalf of FamilyMeans or dilute his or her loyalty to FamilyMeans;
 - f) might cause the employee to acquire a financial or proprietary interest in the substance or outcome of any work performed by or on behalf of FamilyMeans;
 - g) might present work performed by or for FamilyMeans as if it had been performed by or for another person or entity; violates the confidentiality of clients.
- A.3.04.** Employees leaving the agency to go into private practice must do the following:

1. Tell clients about their departure and give them the option to stay at FamilyMeans to be transferred to a second therapist within the agency; or to follow the therapist who is leaving for private practice; or other options as appropriate. When the therapist chooses to take the clients with them, they are required to offer that option to all clients regardless of ability to pay for services.
2. Should the client choose to stay at FamilyMeans and be transferred the therapist will participate in the transfer as appropriate.
3. Should the client choose to follow the therapist who is leaving, the client may have the new address and phone number to reach the therapist.
4. Records will be sent by request after the therapist has left FamilyMeans in the same manner any other professional outside the agency would request copies of records.

A.3.05. No employee of FamilyMeans shall have financial proprietary interest in a contract he or she negotiates, prepares, authorizes or approves for FamilyMeans.

A.3.06. All work developed as part of employment responsibilities with FamilyMeans is the property of FamilyMeans and is solely owned by FamilyMeans.

A.3.07. No employee or volunteer of FamilyMeans shall offer, give, seek or accept for him/herself or others any gifts, favors, or entertainment from clients, volunteers or vendors, other than common courtesies usually associated with customary business or professional standards. Gratuities or honorariums must be remitted to FamilyMeans.

A.3.08. When engaged in any conference, speaking engagement or other public activity which is not undertaken as part of his or her employment by FamilyMeans, no employee shall:

- a. suggest, by use of the FamilyMeans name, that FamilyMeans supports or endorses a particular political cause or position not officially supported by FamilyMeans;
- b. suggest, by use of the FamilyMeans name, that the personal views expressed by an individual employee are shared by FamilyMeans; or

- c. suggest, by use of the FamilyMeans name or reference to the employee's position with FamilyMeans, that the personal activities of an employee are being undertaken on behalf of, or are endorsed by FamilyMeans.

A.3.09. In the event that any employee is confronted with an opportunity for outside work that involves activities he or she believes might violate this policy, the employee must discuss the matter with his or her Supervisor and obtain their approval.

CROSS-REFERENCE: Code of Ethics for Board of Directors

A.1.-Eligibility Criteria for Services

Resource Development Policy

Employee Handbook

Note: Policy A.3 and A.4 were merged into 1 policy – A.3 on 08/06/2018

Policy Approved: July 31, 1989, Nov. 25, 2013
Policy Reviewed: April 28, 1997, February 23, 1998, April 15, 2002, Oct. 23, 2006, February 15, 2010, November 2013, 5/19/14, September 2018
Policy Revised: April 28, 1997, November 15, 2013, September 2018
Legal Statutes Reference: MN Statute 317A.255
Expert Review: Legal review 11/10

**FAMILYMEANS
POLICY**

C. PERSONNEL

C.8. TITLE: Staffing Policy

POLICY: FamilyMeans will not discriminate against any employee, contractor, applicant for employment, volunteers or persons requesting services based on age, gender, sexual orientation, color, race, creed, national origin, ancestry, religious persuasion, marital status, political belief, physical or mental disability, pregnancy, military or veteran status, status with respect to public assistance or any other characteristic protected under state, federal or local law.
Employees, contractors, and volunteers will be recruited based on qualifications needed for the position. Employees, contractors, and volunteers will receive on-going support, recognition and opportunities for feedback from their respective functional leader.

PROCEDURES:

C.8.01. Candidates will complete an application form. The application, along with other personnel records, will be kept in an active file during the employee/contractor/volunteer's time of service and will be kept in a closed file for seven years.

C.8.02. Staff will contact three or more references given by the applicants and others we deem appropriate. Staff will also complete an authorization for a criminal background check on each applicant. Any past record of abuse will disqualify a person. Questions about a past record will be decided on a case-by-case basis by staff. Failure to provide this authorization will be a sufficient basis for denial of employment.

C.8.03. The background check is required before work with a client begins. Volunteers are required to attend a job orientation and training session before they begin their assignment. Opportunities for in-service training and support are offered during the year. Employees are provided on the job training.

C.8.04. A job description will be provided to include functions, duties and responsibilities.

CROSS REFERENCE:

A.1. Eligibility Criteria for Services
Volunteer Handbook

Employee Handbook
C.11 Background Check Policy

Note: In December 2018, Policy C.9 Volunteer: Sexual Harassment and Unlawful Discrimination was folded into C.1 Anti-Harassment Policy. Policy C.9 was retired.

Policy Approved:	<u>February 23, 1998, February 24, 2003</u>
Policy Reviewed:	<u>July 18, 2005, 11/15/10, 6/23/14, December 2018</u>
Policy Revised:	<u>Oct. 2004, 11/10, December 2018</u>
Legal Statutes:	<u>State of WI, Dept. of Health and Family Services</u>
Expert Review:	<u>Legal review 11/10, October 2018</u>

**FAMILYMEANS
POLICY**

C. PERSONNEL

C.15. TITLE: Non-Discrimination Policy

POLICY: FamilyMeans prohibits discrimination against any employee, independent contractor or volunteer of the agency. This policy extends to all aspects of the employment, contracting and volunteering relationship including, but not limited to, recruiting, hiring, promotion, transfer and compensation. Specifically, the agency will provide employment and advancement opportunity on the basis of merit within the context of its unique business environment.

FamilyMeans prohibits discrimination against any employee, contractor or volunteer because of age, gender, sexual orientation, color, race, creed, national origin, ancestry, religious persuasion, marital status, political belief, physical or mental disability, pregnancy, military or veteran status, status with respect to public assistance or any other characteristic protected under state, federal or local law.

There will be no retaliation against an affected individual as a result of bringing forward a complaint.

Discriminatory conduct on the part of any FamilyMeans employee, contractor or volunteer will result in disciplinary action up to and including termination of employment, contract or volunteer relationship with FamilyMeans.

PROCEDURES:

C.2.15.1 All personnel who are responsible for hiring and promoting employees/contractors/volunteers are expected to support this effort and to respond promptly and appropriately to any concerns that are brought to their attention.

C.2.15.2 To respond to an incident of discrimination or formally report an incident of discrimination please refer to FamilyMeans policy C.1, the employee handbook, and/or volunteer handbook.

CROSS REFERENCE:

C.1: Harassment Policy

C.9: Volunteer: Sexual Harassment and Unlawful Discrimination

C.13: Whistleblower Protection Policy

**Employee Handbook
Volunteer Handbook**

Policy Approved: 4/27/15
Policy Reviewed: Exec. Comm. 4/20/15, December 2018
Policy Revised: December 2018
Legal Statutes Reference: Title VII, ADA
Expert Review: October 2018

**FAMILYMEANS
POLICY**

C. PERSONNEL

C.10. TITLE: Behavior Support and Management Policy

POLICY: Behavior Support and Management begins with creating an environment in which the need for restrictive intervention is minimized to the greatest extent possible. A culture that promotes respect, healing and positive behavior and provides individuals with the support they need to manage their own behaviors, can help prevent emergency situations. Restrictive behavior management, including restraints and seclusion are not used under any circumstances. This policy applies to clients as well as to employees, contractors, consultants and volunteers. The preventive nature/relationship building of the agencies programs creates a safe place not likely to evoke behavior problems. Our client population typically present with social/emotional issues rather than behavioral issues. Failure to abide by this policy may result in disciplinary action, up to and including termination.

PROCEDURES:

C.10.1 Mental Health services mitigate behavior issues by:

1. Requiring parents of young children to always be present in the building during therapy sessions so they can be called on to respond to any behavior problems.
2. If adolescents present with aggression they need to leave or the agency may call 911.
3. The preventive nature/relationship building of mental health services creates a safe environment not likely to evoke behavior problems. The client population typically present with social/emotional issues rather than behavioral issues.

C.10.2 School-based mental health services mitigate behavior issues by:

1. Therapists will be familiar with the school sites policy for responding to behavior issues and follow those protocols, which include engaging the appropriate school personnel to intervene.

C.10.3 Caregiver Support Respite volunteers and staff use positive support strategies and techniques that promote a safe and enjoyable experience for the child or adult care receiver. They will:

1. Follow individualized strategies as discussed with the family caregiver
2. Shift the focus by verbally redirecting the person
3. Model desired behavior and reinforce appropriate behavior
4. Offer activities that are relaxing and enjoyable to the person
5. Create a calm environment and speak calmly
6. Respect the person's need for physical space and/or privacy

C.10.4 Youth Development Program staff will work to reduce and address inappropriate behaviors by:

1. Ongoing modeling of appropriate actions and behaviors
2. Shaping the program environment and interactions to reduce improper behaviors
3. Objectively review inappropriate behaviors with youth
4. Discuss/propose behavior alternatives with youth
5. Employ logical consequences for inappropriate behaviors.

C.10.5 Training on these positive techniques for all personnel will occur during orientation and annually thereafter. Volunteers will receive this training at their orientation.

C.10.6 All incidents related to these procedures will be reported to the Executive Assistant for documentation. They will also be reported to the employee/volunteer supervisor.

CROSS REFERENCE:

- Employee Handbook, disciplinary actions
- Volunteer Handbook
- Privacy & Security; Sanctions Policy
- Risk Management Policy

Policy Approved:	<u>February 24, 2003, October 24, 2005, Nov. 24, 2014</u>
Policy Reviewed:	<u>Oct. 23, 2006, 11/15/10, 6/23/14, December 2018</u>
Policy Revised:	<u>October 2005, Oct. 23, 2006, and 11/10, December 2018</u>
Legal Statutes:	
Expert Review:	<u>Legal review 11/10, October 2018</u>

FAMILYMEANS POLICY

A. AGENCY GOVERNANCE

A.10 **TITLE:** Social Media

PURPOSE: Social media may be used by FamilyMeans employees, interns, and volunteers for business-related purposes subject to the restrictions set forth in agency procedures. These restrictions are intended to ensure compliance with legal and regulatory restrictions and privacy and confidentiality agreements. "Social media" includes, but is not limited to, items as defined below.

DEFINITIONS:

Social media – Includes but is not limited to blogs, podcasts, discussion forums, RSS feeds, video sharing, and social networks.

Blog – Short for "Web log," a site that allows an individual or group of individuals to share a running log of events and personal insights with online audiences.

Electronic Media – Non-computing devices; e.g., flash drives, CDs, DVDs, tapes, hard disks, and any other interchangeable, reusable, and/or portable electronic storage media (1) on which information is stored, or (2) which are used to move data among computing systems/devices.

Podcast – A collection of digital media files distributed over the Internet, often using syndication feeds, for playback on portable media players and personal computers.

RSS feeds or Syndication feeds – A family of different formats used to publish updated content such as blog entries, news headlines or podcasts and "feed" this information to subscribers via email or by an RSS reader. This enables users to keep up with their favorite websites in an automated manner that's easier than checking them manually (known colloquially as "really simple syndication").

Wiki – allows users to create, edit, and link web pages easily; often used to power community websites.

FamilyMeans Information – Information in any form or media that is created by or on behalf of FamilyMeans in the course and scope of its business, regardless of whether that information is maintained or stored by FamilyMeans or by others on FamilyMeans' behalf. Examples of

FamilyMeans information include, but are not limited to, patient and member records, personnel records, financial information, company competitive information, FamilyMeans developed intellectual property, and business e-mail messages.

Personally Identifiable Information (PII) – Any individually identifiable information regarding a client of FamilyMeans collected, received, created, transmitted, or maintained in connection with his/her status as a client, such as PHI. PII includes, but is not limited to, information about a client’s physical or mental health, the receipt of health care, or payment for that care; client’s premium records, enrollment and disenrollment information; name, address, Social Security number, account number, security code, information from or about transactions, driver’s license number, financial or credit account numbers, phone numbers, ISP and Internet domain addresses, and other personal identifiers. PII does not include individually identifiable information in FamilyMeans employment records; however, it may be subject to other state and federal privacy protections. PII does not include individually identifiable information (such as a cell, home or business phone number) that a workforce member obtains, transmits, or maintains about another workforce member in connection with a personal or employment-related relationship with that person.

Protected Health Information (PHI) – Associated with the Health Insurance Portability and Accountability Act of 1996, PHI is individually identifiable health information (oral, written or electronic) that is transmitted or maintained in any medium including electronically. It is found in client records and medical documents such as prescriptions, lab results, evaluations and billing records. Individually identifiable health information in FamilyMeans employment records is not PHI; however, it may be subject to other state and federal privacy protections.

Non-Public Information (NPI) – Personally identifiable financial information that is provided by a consumer to a financial institution, results from any transaction with the consumer or any service performed for the consumer, or is otherwise obtained by the financial institution. It also includes any “list, description, or other grouping of consumers (and publicly available information pertaining to them) that is derived using any nonpublic personal information other than publicly available information.

POLICY:

1. **Using social media.** Employees are expected to adhere to FamilyMeans compliance requirements and the FamilyMeans Employee Handbook when using or participating in social media. All the rules that apply to other FamilyMeans communications apply here, specifically respecting clients and one another; protecting

confidentiality, privacy and security; and safeguarding and proper use of FamilyMeans assets.

- 2. Obtain pre-approval before setting up FamilyMeans hosted sites.** Employees must seek approval from their supervisor and the Communications Department before setting up a FamilyMeans hosted blog, Facebook page, or other social media site on behalf of the agency. This provision also applies to any social media site created by an employee that includes a link to the FamilyMeans website or gives the appearance of being endorsed by the agency.
- 3. Abide by the law and respect copyright laws.** Employees may not post content or conduct any activity that fails to conform to any and all applicable state and federal laws. For FamilyMeans and our employees' protection, it is critical that everyone abide by the copyright laws by ensuring that they have permission to use or reproduce any copyrighted text, photos, graphics, video or other material owned by others.
- 4. No disclosure of proprietary information.** Employees may not disclose any confidential or proprietary information of or about FamilyMeans, its affiliates, vendors, or suppliers, including but not limited to business and financial information; may not represent themselves as communicating the views of FamilyMeans; and may not do anything that might reasonably create the impression that they are communicating on behalf of or as a representative of FamilyMeans.
- 5. Self-hosted sites.** Employees must not say or suggest that the views and opinions they express related to FamilyMeans and health care topics represent the official views of FamilyMeans.
- 6. Client privacy and confidentiality.** Employees may not use or disclose any client identifiable information of any kind on any social media without the express written permission of the client. Even if an individual is not identified by name within the information you wish to use or disclose, if there is a reasonable basis to believe that the person could still be identified from that information, then its use or disclosure could constitute a violation of the Health Insurance Portability and Accountability Act (HIPAA) and FamilyMeans policy.
- 7. Employee privacy and confidentiality.** Employees should avoid discussing and identifying other employees unless they have permission to do so, and obtain permission from coworkers before posting or tagging photos on social media sites.

8. **Be respectful.** Employees may not post any material that is obscene, defamatory, profane, libelous, slanderous, threatening, harassing, abusive, hateful, or embarrassing to another person or entity when posting to FamilyMeans hosted sites, nor should they do so in other social media networks, particularly if they are identified as FamilyMeans employees.
9. **Personal discretion and responsibility.** Employees are encouraged to exercise discretion, common sense, and responsibility in posting photos and personal information, including contact information, on personal social media pages, including social media networks and blogs.
10. **“Friending” on Facebook.** Employees may not “friend” their clients during the time they are providing services or after the professional relationship has been terminated. “Friending” professional colleagues, volunteers or donors of FamilyMeans should be done with discretion.
11. **Use of agency resources.** If an employee has been designated by FamilyMeans to represent the agency and its services in social media, it is acceptable to use FamilyMeans resources to complete that task. Employees are urged to use discretion and judgment in using FamilyMeans resources for social media communications. Creating content for social media in which the main theme does not affect or impact FamilyMeans is not an acceptable use of FamilyMeans resources.
12. **FamilyMeans interns and volunteers will follow this policy and procedure where it applies to protecting privacy and confidentiality of client and agency data and information. In other situations, they will consult supervisor direction and approval.**

CROSS REFERENCE:

Policy Approved:	<u>1/23/12</u>
Policy Reviewed:	<u>5/19/14, September 2018</u>
Policy Revised:	<u>September 2018</u>
Legal Statutes Reference:	_____
Expert Review:	_____

C. PERSONNEL

- C.1. **TITLE:** Anti-Harassment Policy
POLICY: FamilyMeans is committed to providing a work environment that is free from harassment based on age, gender, sexual orientation, color, race, creed, national origin, ancestry, religious persuasion, marital status, political belief, physical or mental disability, pregnancy, military or veteran status, status with respect to public assistance or any other characteristic protected under state, federal or local law. Such conduct is prohibited in any form at work-related functions. This policy applies to all FamilyMeans employees, volunteers, contractors, guests, clients, vendors and persons doing business with FamilyMeans.

DEFINITION:

Sexual harassment; one type of prohibited harassment, has been defined as: Unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when:
Submission to or rejection of such conduct by an individual is used as a factor, either explicitly or implicitly, in decisions affecting that individual's employment; or
Such conduct has the purpose or effect of substantially interfering with an individual's work performance or creates an intimidating, hostile or offensive working environment.
Examples of conduct prohibited by this policy include but are not limited to:

- Unwelcome sexual flirtation, advances or propositions
- Verbal comments related to an individual's age, race, gender, color, religion, national origin, disability, sexual orientation or other protected characteristics
- Explicit or degrading verbal comments about another individual or his/her appearance
- The display of sexually suggestive pictures or objects in any workplace location including transmission or display via computer
- Any sexually offensive or abusive physical conduct
- Displaying cartoons or telling jokes which relate to an individual's age, race, gender, color, religion, national origin, disability, or sexual orientation

PROCEDURES:

- C.1.01. The employee handbook or volunteer handbook addresses this policy and is given to new staff and volunteers at the date of hire. Any policy revisions will be given to employees and volunteers in writing and verbally. Potential victims need to understand they need not tolerate this abuse. Potential offenders need to know they are subject to discipline and discharge for violating the policy.

- C.1.02. Steps to address sexual harassment:
- Employees/volunteers who believe they are being sexually harassed should immediately and clearly advise the person that the behavior is offensive.
 - If the employee/volunteer does not feel able to handle the sexual harassment directly, the problem should and must be brought to the attention of a Supervisor, or the President.
 - When other employees/volunteers are aware of the harassment towards others they have an obligation to report it to a Supervisor or the President.
 - Complaints shall be documented in writing by the supervisor or President and will be handled in a respectful manner with expediency.

- A timeline, whenever possible, for the investigation and if necessary, corrective action, will be established by the claimant and the President/Supervisor at their first meeting.
- The agency's policy on confidentiality will apply to a sexual harassment complaint.
- A thorough investigation will be conducted by the President, with the support of HR. Should the complaint be against the President, the Supervisor and the Board Chair will investigate.
- Following an investigation, if necessary, appropriate corrective action will be taken by the Agency.
- Should the President be absent the Management Staff authorized to be in charge would carry out the hearing and investigative responsibilities.

CROSS-REFERENCE:

- Employee Handbook
- Policy on Confidentiality
- Grievance Policy for Clients
- Grievance Policy for Employees

Policy Approved: February 24, 2003
Policy Reviewed: 6/23/2014, December 2018
Policy Revised: Oct. 2004, December 2018
Legal Statutes: _____
Expert Review: Legal review 11/10, October 2018