

# **Independent Identity**

## **EMPLOYEE HANDBOOK**

*June 22, 2026*

# Employee Handbook

## Table of Contents

|                                                                  |    |
|------------------------------------------------------------------|----|
| Introduction .....                                               | 4  |
| Mission Statement .....                                          | 5  |
| Values .....                                                     | 5  |
| Fair Employment Practices .....                                  | 5  |
| At-Will Employment .....                                         | 5  |
| Introductory Periods .....                                       | 6  |
| Equal Employment Opportunity and Anti-Harassment Policy .....    | 6  |
| Disability and Pregnancy Accommodation .....                     | 10 |
| Lactation Accommodation .....                                    | 13 |
| Religious Accommodation .....                                    | 14 |
| Employee Conduct .....                                           | 15 |
| Cell Phone .....                                                 | 15 |
| Code of Conduct .....                                            | 16 |
| Confidentiality and Trade Secrets .....                          | 19 |
| Client Confidentiality and HIPAA .....                           | 19 |
| Drug and Alcohol Abuse .....                                     | 21 |
| Drug and Alcohol Testing .....                                   | 22 |
| Texas Drug and Alcohol Testing .....                             | 22 |
| Employee Dating .....                                            | 22 |
| Employer-Sponsored Social Events .....                           | 23 |
| Gifts .....                                                      | 24 |
| Open Door .....                                                  | 24 |
| Politics in the Workplace .....                                  | 25 |
| Private Work With Clients Outside Work Hours .....               | 27 |
| Smoking .....                                                    | 27 |
| Social Media .....                                               | 28 |
| Employee Ideas, Innovation, and Professional Collaboration ..... | 31 |
| Weapons in the Workplace .....                                   | 31 |
| Workplace Violence .....                                         | 33 |
| Workplace Rules .....                                            | 33 |
| Authorization for Use of Personal Vehicle .....                  | 33 |
| Background Checks .....                                          | 34 |
| Bulletin Boards .....                                            | 35 |
| Business Expense Reimbursement .....                             | 36 |
| Client-Behavior Damage Reimbursement .....                       | 37 |
| Business Travel .....                                            | 38 |
| Independent Identity Property .....                              | 38 |
| Driving Record .....                                             | 38 |
| Employee Classification .....                                    | 39 |
| Health and Safety .....                                          | 40 |
| Inclement Weather .....                                          | 41 |
| Key and Access Cards .....                                       | 41 |
| Pets in the Workplace .....                                      | 42 |
| Products and Services Knowledge .....                            | 42 |
| Public Relations .....                                           | 42 |
| Dress and Personal Appearance .....                              | 43 |
| Punctuality and Attendance .....                                 | 43 |
| Remote Working .....                                             | 43 |

|                                                            |    |
|------------------------------------------------------------|----|
| Wages and Scheduling .....                                 | 46 |
| Direct Deposit .....                                       | 46 |
| Overtime .....                                             | 46 |
| Payment of Wages .....                                     | 47 |
| Payroll Deductions .....                                   | 47 |
| Salary Pay for Exempt Employees .....                      | 48 |
| Timekeeping Requirements for Non-Exempt Employees .....    | 48 |
| Workweek and Work Schedules .....                          | 48 |
| Time Off .....                                             | 48 |
| Holidays .....                                             | 48 |
| Paid Time Off .....                                        | 49 |
| Unlimited Time Off .....                                   | 51 |
| Family and Medical Leave .....                             | 52 |
| Federal Family and Medical Leave Act (FMLA) .....          | 52 |
| Jury Duty Leave .....                                      | 57 |
| Military Leave .....                                       | 58 |
| Political Activity Leave .....                             | 60 |
| Texas Political Activity Leave .....                       | 60 |
| Voting Leave .....                                         | 61 |
| Witness Duty Leave .....                                   | 61 |
| Benefits .....                                             | 63 |
| Employee Benefits .....                                    | 63 |
| Workers' Compensation .....                                | 63 |
| Performance, Discipline, and Separation .....              | 63 |
| Exit Interviews .....                                      | 63 |
| Performance Review .....                                   | 64 |
| Performance Bonus Time Incentive Program .....             | 66 |
| Termination of Employment .....                            | 66 |
| Handbook Acknowledgment and Agreement .....                | 69 |
| Complaint Report Form - Discrimination or Harassment ..... | 71 |
| Disability Accommodation Request Form .....                | 74 |
| Religious Accommodation Request Form .....                 | 77 |

## **Introduction**

This Employee Handbook was created to be a resource for our employees. We have tried to write it so that it is easy to understand and organize it so that employees can quickly find what they are looking for. **THIS HANDBOOK DOES NOT CREATE AN EXPRESS OR IMPLIED CONTRACT OF EMPLOYMENT**, but employees should read and understand it. It replaces any prior handbooks and inconsistent policies or statements but not collective bargaining agreements or other contracts. In the future, we may need to revise this handbook, and we will strive to make our employees aware of changes. This handbook should be read and interpreted to be consistent with applicable laws. Independent Identity is referred to as the "Organization" throughout the handbook.

## **Mission Statement**

### **Who We Are**

Independent Identity empowers adults with intellectual and developmental disabilities by providing individualized, evidence-based support in a safe and enriching environment.

### **Mission Statement**

We promote independence, meaningful relationships, and a higher quality of life through compassionate care and purposeful programming.

### **Vision Statement**

We envision a world where people of all abilities are valued, included, and empowered to live with purpose and dignity—thriving as full members of their communities.

## **Values**

### **Empowerment**

Empowerment involves supporting individuals with IDD and autism to achieve their highest level of independence.

### **Dignity and Respect**

Upholding the inherent worth and dignity of every individual is crucial. This involves fostering an environment that respects and understands the diverse abilities and backgrounds of our participants.

**Evidence-Based Practices** Utilizing evidence-based practices, particularly those rooted in Applied Behavior Analysis (ABA), to guide our interventions.

**Collaborative Community** Believing in the power of collaboration, we work closely with families, caregivers, and professionals to create a unified support system.

**Advocacy** Advocating for the rights and inclusion of individuals with IDD and autism, raising awareness, reducing stigma, and promoting beneficial policies.

**Transparency** Maintaining open communication and transparency in all interactions.

**Celebrating Achievements** Recognizing and reinforcing the unique achievements of each participant and staff, contributing to their overall quality of life.

## **Fair Employment Practices**

### **At-Will Employment**

Employment at Independent Identity is at-will. This means that both Independent Identity and employees may terminate their employment relationship for any reason and without notice.

Independent Identity requests at least 2 weeks' notice from employees before their resignation.

Nothing in this Handbook or in any other document, policy, or agreement limits the right of Independent Identity and employees to terminate employment at-will. Except for certain authorized individuals at Independent Identity, employees have no authority to enter into any agreement for employment for a specified period or to make any agreement or representation contrary to the Organization's policy of at-will employment.

### **Introductory Periods**

The first 60 of an employee's employment with Independent Identity is an introductory period. During this period, the Organization reviews the employee's performance, attendance, conduct, and overall fit for the position, and the employee has the opportunity to evaluate the position and the Organization. The Organization may, in its sole discretion, adjust the employee's job duties, responsibilities, schedule, or position, or end the employment relationship, at any time during the introductory period.

Nothing about the introductory period — including its length, completion, or any review or feedback provided during it — changes the at-will nature of employment with Organization. Both during and after the introductory period, employment with Organization remains at-will and may be ended by either the employee or Organization at any time, with or without notice, and with or without cause.

### **Equal Employment Opportunity and Anti-Harassment Policy**

Independent Identity is an equal opportunity employer and makes employment decisions based on current need and merit. Creating an inclusive and professional environment where employees feel comfortable, safe, and free from inappropriate and disrespectful conduct is a core value here.

Independent Identity follows applicable state, federal and local laws, which prohibit discrimination or harassment on the basis of: age (40+), national origin, citizenship, race (including hair that is part of the cultural identification of an ethnic group, such as texture, type, style, and length, or that is a physical characteristic of an ethnic group, such as braids, locks, or twists), color, religion, creed, sex or gender (including pregnancy, childbirth or related conditions), sexual orientation, gender identity or expression, disability, military or veteran status (including state national guards), genetic information, COVID-19 vaccination status, leaving work due to a public evacuation order, or any other characteristic protected by law. Employees should check their state addenda for any additional state or local protections. These prohibitions apply in the workplace, on business trips, during business meetings, at business-related social events, and at any other location where Independent Identity-sponsored events take place.

Independent Identity is also committed to maintaining a workplace free from discrimination and sexual harassment, which is offensive, a violation of Independent Identity policies, and unlawful. Independent Identity will penalize people who engage in discrimination or sexual harassment or allow such behavior to continue, and employees that violate this policy will be subject to discipline, up to and including termination of employment.

Any questions about this policy can be directed to Lisa Lopez at [admin@independentidentity.org](mailto:admin@independentidentity.org).

#### Who does this policy apply to?

This policy applies to all employees, applicants for employment, interns (whether paid or unpaid), contractors, vendors, and any other people conducting business with Independent Identity.

#### How is harassment defined?

Harassment is an unlawful form of bullying and a violation of Independent Identity policy. Harassment can occur between anyone, regardless of their sex or gender, involves harmful, unwanted, and repetitive behavior designed to intimidate or degrade, and is based on protected characteristics. Harassers can be a superior, subordinate, coworker, or anyone else in the workplace. Harassment may take many forms, including verbal, physical, or visual harassment.

Bullying also involves harmful, unwanted, and repetitive behavior toward anyone designed to intimidate or degrade, and is also a violation of Independent Identity policy, even when not based on protected characteristics.

Sexual harassment is a form of sex discrimination and is unlawful. It is also a violation of Independent Identity policy to harass a person because of that person's sex, including the person's sexual orientation, gender identity, or pregnancy. Unlawful sexual harassment isn't limited to the physical workplace. It can occur in a remote work environment, while employees are traveling for business, or at Independent Identity-sponsored events or parties. Calls, texts, emails, and social media usage by employees on work or personal devices during work or non-work hours can constitute unlawful workplace harassment, even if they occur away from the workplace.

Sexual harassment means:

- Unwelcome sexual advances or unwelcome conduct of a sexual nature (including sexually suggestive or offense conduct);
- Sexual misconduct, which means any behavior of a sexual nature which also involves coercion, abuse of authority, or misuse of an individual's employment position; or

- Requests for sexual favors or conduct of a sexual nature when (1) submission to that conduct is made either explicitly or implicitly a term or condition of an individual's employment, (2) submission to or rejection of that conduct is used as the basis for any employment decision affecting the employee, or (3) that conduct has the purpose or effect of substantially interfering with an employee's work performance or creating an intimidating, hostile, or offensive working environment.

#### What are examples of sexual harassment?

Here are some examples of sexual harassment that are strictly prohibited:

- Physical acts of a sexual nature like touching, pinching, patting, kissing, hugging, grabbing, brushing against another person's body, poking another person's body, rape, sexual battery, molestation, or attempts to commit these assaults.
- Unwanted sexual advances or propositions like requests for sexual favors accompanied by implied or overt threats concerning a person's job performance evaluation, promotion, or other job benefits.
- Sexually oriented gestures, noises, lewd remarks, jokes, or comments that create a hostile work environment.
- Sex stereotyping like when a person's conduct or personality traits are considered inappropriate simply because they may not conform to other people's ideas about how people of a particular sex should act or look.
- Sexual or discriminatory material in the workplace that is sexually demeaning or pornographic, including sexual displays on computers or cell phones in the workplace.
- Hostile actions against a person because of their sex, sexual orientation, gender identity, or for being transgender, including bullying, yelling, name-calling, or interfering with the person's ability to perform the job.
- Retaliation for complaining about sexual harassment.

#### How can employees report discrimination or harassment?

Anyone who is subject to sexual harassment is encouraged to report that to their supervisor or Lisa Lopez at [admin@independentidentity.org](mailto:admin@independentidentity.org). Employees who want their report to be confidential should inform their supervisor or Lisa Lopez of that fact when making their report. Anyone who knows about potential instances of sexual harassment should report that immediately to their supervisor or Lisa Lopez. Any supervisor that has any knowledge about instances of sexual harassment must report that to Lisa Lopez. Supervisors will be subject to discipline for failing to report suspected sexual harassment or allowing sexual harassment to continue. Supervisors will also be subject to discipline for engaging in any retaliation.

Reports of sexual harassment may be made verbally or in writing. Individuals are encouraged to complete the **Complaint Report Form - Discrimination or Harassment** attached to this handbook when submitting a discrimination or sexual harassment complaint.

*Where can employees report discrimination or sexual harassment outside of Independent Identity?*

If harassment involves unwanted physical touching, coerced physical confinement, or coerced sex acts, the conduct may constitute a crime, and anyone making a report should contact the local police department. Victims of discrimination or sexual harassment may also file a complaint and pursue legal remedies outside of Independent Identity through the following federal, state, and local government agencies:

- United States Equal Employment Opportunity Commission (EEOC). This federal agency enforces federal anti-discrimination laws. A person can file a charge with the EEOC anytime within 180 days from the last instance of harassment (or 300 days if a state or local agency enforces a law that prohibits sexual harassment). There is no cost to file a charge with the EEOC. The EEOC will investigate the complaint and determine whether there is reasonable cause to believe that discrimination has occurred, at which point the EEOC will issue a Right to Sue letter permitting the person to file a complaint in federal court. An employee alleging discrimination or harassment at work can file a charge with the EEOC online by using the [EEOC's public portal](#) or in person at a local EEOC office. Contact the EEOC by calling 1-800-669-4000 (TTY: 1-800-669-6820), visiting their website at [www.eeoc.gov](http://www.eeoc.gov), or via email at [info@eeoc.gov](mailto:info@eeoc.gov).
- Texas Commission on Human Rights; [www.twc.texas.gov/partners/civil-rights-discrimination](http://www.twc.texas.gov/partners/civil-rights-discrimination); 888-452-4778.

*How does Independent Identity internally investigate complaints of discrimination and harassment?*

Independent Identity will investigate all complaints of discrimination or sexual harassment. Investigations will be prompt and thorough, and they will be kept confidential to the extent possible. All people involved have a right to a fair and impartial investigation. Employees may be required to cooperate with a sexual harassment investigation.

While the process may vary from case to case, investigations will generally occur in the following steps. Independent Identity will:

- Inform the reporter of the right to file a complaint or seek external remedies.
- Immediately review the allegations and take any necessary short-term actions (for example, instructing the accused to refrain from communications with the alleged victim), as appropriate.

- Inform the alleged victim of the steps that will be taken (including when the accused will be notified of the accusation) and how their identity will be protected.
- If the complaint is made verbally, the reporter will be encouraged to complete the Complaint Form in writing. If the reporter refuses, Independent Identity will prepare the Complaint Form based on the verbal report.
- Take steps to obtain and preserve documents, emails, or phone records relevant to the investigation.
- Request and review all relevant documents, including all electronic communications.
- Interview all parties involved, including any relevant witnesses.
- Create confidential written documentation of the investigation, which contains the complaint; a list of all documents reviewed, along with a detailed summary of relevant documents; a list of names of those interviewed, along with a detailed summary of their statements; a timeline of events; a summary of prior relevant incidents, reported or unreported; and the basis for the decision and final resolution of the complaint, together with any corrective action.
- Promptly notify the reporter and the accused of the final determination.
- Implement any corrective actions.

#### Are employees protected from retaliation?

Retaliation against any person for reporting incidents, making a complaint, or participating in an investigation of harassment or discrimination is strictly prohibited and is against the law. This anti-retaliation provision isn't intended to protect people making intentionally false charges of discrimination or harassment.

Nothing in this policy is intended to infringe upon employees' rights to engage in [concerted activity](https://www.nlrb.gov/about-nlrb/rights-we-protect/your-rights/employee-rights) under Section 7 of the NLRA. <https://www.nlrb.gov/about-nlrb/rights-we-protect/your-rights/employee-rights>.

#### **Disability and Pregnancy Accommodation**

*This policy applies only when Independent Identity has 15 or more employees.*

Independent Identity is committed to supporting both pregnant employees and employees with disabilities. Independent Identity will provide these employees with reasonable accommodations to address their disabilities and pregnancy-related limitations, as long as they don't impose an undue hardship on our operations.

Independent Identity complies with all applicable federal and state laws concerning the employment of pregnant women and people with disabilities and follows all regulations and guidance issued by the Equal Employment Opportunity Commission (EEOC).

This policy is not limited to pregnancy-related disability and includes any other condition that qualifies as a disability as defined below.

*Who can ask for an accommodation?*

Employees are eligible for accommodation if they (1) have a disability or a pregnancy-related limitation, (2) have the skills, experience, education, and other qualifications necessary for their job, and (3) are capable of performing the essential functions of their job, with or without reasonable accommodation.

*What qualifies as a disability?*

Employees have a disability if they (1) have a physical or mental impairment that substantially limits one or more major life activities, (2) have a history or record of such impairment, or (3) are perceived by others as having such impairment.

*What qualifies as a pregnancy-related limitation?*

Employees have a pregnancy-related limitation if they have any physical or mental condition that is related to pregnancy or childbirth and limits their ability to perform their job in some way.

*What is a reasonable accommodation?*

A reasonable accommodation is a modification or adjustment to the terms and conditions of an employee's job that allows them to (1) perform all the essential functions of their position, or (2) enjoy equal benefits and privileges of employment as other employees considering their limitation.

Potential accommodations include making existing facilities accessible, job restructuring, modifying work schedules, acquiring new or changing existing equipment, or reassigning the employee to a vacant position. A reasonable accommodation does not include removing essential job functions, creating new jobs, or providing personal items.

Employees should note that an accommodation isn't "reasonable" if it would cause the Organization undue hardship. An accommodation imposes undue hardship if it requires the Organization to incur significant difficulty or expense. Whether a reasonable accommodation creates an undue hardship is evaluated on a case-by-case basis, and Independent Identity will consider several relevant factors when evaluating an accommodation request.

*How should employees ask for an accommodation?*

Employees should submit a request to Lisa Lopez at [admin@independentidentity.org](mailto:admin@independentidentity.org) that (1) explains the job function they are having trouble performing or the employment benefit they are having trouble accessing, and (2) outlines the accommodation they would like. Employees can, but aren't required to, use the attached **Disability Accommodation Request Form** to submit their request. Verbal requests are permissible as well.

Independent Identity can't provide reasonable accommodations unless it knows about the limitations affecting an employee's ability to work or access benefits, but employees don't have to disclose the underlying medical conditions or disabilities that cause the limitation to get an accommodation.

#### *What happens after an employee asks for an accommodation?*

Independent Identity is committed to using an interactive process that incorporates input from the employee to determine whether an accommodation is appropriate and what that accommodation should be. Upon receiving an employee's request, the Organization will promptly reach out to them to clarify their needs and identify the appropriate reasonable accommodations. The Organization may offer alternate suggestions for reasonable accommodations or choose among the employee's suggested accommodations.

If an employee's disability or the appropriate accommodation isn't obvious, the Organization may ask employees to provide medical documentation that establishes that the employee has a disability, shows that they need the requested accommodation, or helps determine what accommodations would be effective.

If Independent Identity and the employee determine together that a reasonable accommodation is available, it will then be put into effect. If it is determined that a reasonable accommodation isn't available because it would cause the Organization undue hardship, because the employee isn't qualified to receive an accommodation, or for any other reason, the employee will receive a written explanation of the reason for the decision. Employees are then free to pursue an appeal through established grievance procedures.

#### *What other information do employees need to know?*

All information Independent Identity has about an employee's disability or medical condition will be kept confidential and maintained in accordance with law. That information will be stored separately from employee personnel files. It may be necessary to share some information with supervisors or other team members to facilitate the accommodation.

Independent Identity prohibits retaliation against employees for requesting or receiving a reasonable accommodation.

Employees should contact Lisa Lopez at [admin@independentidentity.org](mailto:admin@independentidentity.org) with any questions about this policy.

## **Lactation Accommodation**

Independent Identity supports breastfeeding employees and is committed to providing them with reasonable accommodations that don't impose an undue burden on operations.

### **Who can ask for an accommodation?**

Employees who are nursing a child can ask for accommodation.

### **What is a reasonable accommodation?**

A reasonable accommodation is an adjustment to the terms or conditions of their job that allows employees the time and space they need express milk or to breastfeed at work. Generally, this means that the Organization will provide all employees who wish to express breast milk or breastfeed at work with a reasonable amount of break time and space to do so.

### **How much break time can employees get?**

Employees get as much break time as is reasonably necessary for them to express milk or breastfeed. This break time will run concurrently, if possible, with any paid break time already provided. In the event it's not possible for the time to express milk or breastfeed to run concurrently with the paid break time already provided, the break time for expressing milk or breastfeeding will be unpaid, unless otherwise required by law.

### **What type of space will employees be provided?**

Employees working on site will be given a safe and clean place to express milk or breastfeed, other than a bathroom. This space will include an electrical outlet, a place to sit, and a flat surface (other than the floor) for a breast pump and personal items; it will be shielded from view and free from intrusion by coworkers and the public. Employees must be allowed to store milk safely while at work, such as in an insulated food container, personal cooler, or refrigerator. Independent Identity will make efforts to provide the location as close to an employee's work area as possible. An employee's regular work area may be used if it meets these criteria and allows the employee to express milk or breastfeed in private.

Employees who work in Texas will also be allowed to breastfeed in any location where they are allowed to be.

### **How should employees ask for an accommodation?**

Employees should submit a written request for accommodation to Lisa Lopez at [admin@independentidentity.org](mailto:admin@independentidentity.org).

### **What happens after an employee asks for an accommodation?**

Upon receiving an employee's request, the Organization will review it to decide whether an accommodation can be provided without causing undue hardship to its operations. If an accommodation can be made, management will meet with the employee to discuss it. If the Organization determines that an accommodation can't be made because it would cause undue hardship, management will instead meet with the employee to explain that decision. If the employee agrees with management's decision, it will be put into effect. If the employee does not agree with the decision, they can pursue an appeal through the Organization's established grievance procedures.

How does this relate to other handbook policies?

This policy addresses situations where employees need reasonable accommodations to express milk or breastfeed while at work. Employees who are pregnant or have medical conditions related to pregnancy or childbirth may also be eligible for accommodation. See the **Disability and Pregnancy Accommodation** policy for more information.

What other information do employees need to know?

Independent Identity does not discriminate against an employee for requesting an accommodation or on account of their sex, pregnancy, breastfeeding, or lactation.

**Religious Accommodation**

Independent Identity values the religious beliefs and practices of all employees and is committed to providing reasonable accommodation for religious observances if they don't impose an undue burden on our operations.

Who can ask for an accommodation?

Any employee may ask for an accommodation when experiencing a conflict between their religious, ethical, or moral beliefs and their job responsibilities (including their work schedule, company policies or guidelines, or any other aspect of employment).

What is a reasonable accommodation?

A reasonable accommodation is an adjustment to the terms or conditions of an employee's job that enables them to work without compromising their religious, ethical, or moral beliefs and practices. Possible accommodations include changes to job responsibilities, schedule changes, use of paid or unpaid leave, exemptions from dress and appearance standards that don't compromise safety, or adjustments to other aspects of employment.

How should employees ask for an accommodation?

Employees should submit a written request to their supervisor explaining how their job responsibilities conflict with their religious, ethical, moral beliefs and outlines what

accommodation they would like. Employees can, but aren't required, use the attached **Religious Accommodation Request Form** to submit their request.

**What happens after an employee asks for an accommodation?**

Upon receiving an employee's request, their supervisor will review it to decide whether an accommodation can be provided without causing Independent Identity undue hardship. If an accommodation can be made, the supervisor and the employee will then meet to discuss the proposed accommodation. If the supervisor determines that an accommodation can't be made because it would cause Independent Identity undue hardship, they will then meet with the employee to explain that decision. If the employee agrees with the decision, the supervisor will put it into effect. If the employee does not agree with the supervisor's decision, they can pursue an appeal through established grievance procedures.

If employees have any questions about this policy, they should contact Lisa Lopez at [admin@independentidentity.org](mailto:admin@independentidentity.org).

## **Employee Conduct**

### **Cell Phone**

Independent Identity seeks to provide a safe, professional, and distraction-free environment for clients and employees. Employees are expected to use personal electronic devices responsibly and in a manner that does not interfere with client care, safety, productivity, or job performance.

**When can cell phones be used?**

While supervising clients or providing direct services, employees may use personal cell phones only for approved work-related purposes, including:

Work-related communication;  
Emergency situations;  
Approved applications or systems (e.g., LineLeader, Microsoft Teams); or  
Other authorized business purposes.

Personal use of cell phones during work hours—including social media, personal texting, gaming, streaming, or other non-work-related activities—is prohibited while employees are responsible for client supervision or assigned work duties.

Employees may not wear headphones, earbuds, or similar listening devices while supervising clients or performing duties that require awareness of the surrounding environment unless specifically authorized as a workplace accommodation or for an approved business purpose.

Independent Identity has the right to monitor employees for excessive or inappropriate cell phone use. Independent Identity isn't liable for loss or damage to employees' personal cell phones brought into the workplace.

*Is cell phone recording allowed?*

Any client photographs, videos, recordings, or identifying information may be captured, accessed, or shared only for authorized business purposes using approved organizational systems and in accordance with HIPAA, confidentiality, and privacy policies.

*May cell phones be used while driving?*

Employees must comply with all applicable law regarding the use of phones and mobile devices while driving, including laws prohibiting text messaging while driving. Under no circumstances should employees answer or use their phone or mobile device in any way while driving, unless applicable laws allow the use of a cell phone through a hands-free device. Whenever possible, employees should not make or receive calls or texts while driving. Employees may not send work-related emails, text messages, or other written or typed messages while driving. Under no circumstances should employees use phones or mobile devices while driving during adverse weather or difficult traffic conditions. Employees who violate this policy will be considered to be operating outside the course and scope of their employment. Any violations of this policy will subject employees to disciplinary action, up to and including termination of employment.

Failure to follow this policy may result in discipline, up to and including termination of employment.

Nothing in this policy is intended to infringe upon employees' rights to engage in [concerted activity](https://www.nlrb.gov/about-nlrb/rights-we-protect/your-rights/employee-rights) under Section 7 of the NLRA. <https://www.nlrb.gov/about-nlrb/rights-we-protect/your-rights/employee-rights>.

**Code of Conduct**

The success of Independent Identity is created by everyday interactions at work. This policy, along with the rest of the Employee Handbook, establishes appropriate work behavior. When the workplace is respectful, safe, and professional, Independent Identity and employees can thrive. For more information on any of the topics in this policy, check the corresponding policy in the Employee Handbook. Nothing in this policy is intended to infringe upon employees' rights to engage in [concerted activity](https://www.nlrb.gov/about-nlrb/rights-we-protect/your-rights/employee-rights) under Section 7 of the NLRA. <https://www.nlrb.gov/about-nlrb/rights-we-protect/your-rights/employee-rights>.

*What is the expected behavior?*

Respect is essential for workplace success. All employees are expected to be respectful to everyone, including other employees, contractors, customers, and vendors. Communication

should be friendly and collaborative. Employees should not disrupt the workplace or interfere with other employees' work or their ability to perform their jobs.

Team members must follow supervisors' and managers' instructions and competently fulfill their duties in a timely manner. Supervisors and managers must not abuse their authority.

Harassment or discrimination of any kind is unacceptable. Employees should refer to the **Equal Employment and Anti-Harassment** policy for information about what qualifies as harassment and how to report it. All employees should report harassment in the workplace, even if they aren't the target. Employees who report harassment will be protected from retaliation.

#### What safety practices are in place?

Safety is essential for employees to succeed at work. Employee physical safety and health is a top priority for Independent Identity. The **Health and Safety** policy instructs employees on how to maintain a clean workplace. Frequent cleaning and other precautionary practices can help stop the spread of disease and illness in the workplace. To promote a physically safe environment, there is zero tolerance for Workplace Violence of any kind. Any employee who becomes violent or threatens violence will be disciplined or terminated.

Independent Identity is concerned about employees' abuse of alcohol, illegal drugs, and controlled substances. Abuse of these substances can adversely affect employees' work performance, efficiency, safety, and health, and won't be tolerated. Employees should refer to the **Drug and Alcohol Abuse** policy for more information.

#### What is considered to be professional behavior?

Professionalism is also a prerequisite for success at work. Employees are expected to act professionally while working and representing the Organization. All employees should be respectful of everyone's time by following the **Punctuality and Attendance** policy. This includes reporting to work on time and scheduling absences as soon as possible. Employees are encouraged to form friendships and relationships with colleagues, but romantic relationships in the office are subject to the **Employee Dating** policy. Dating is allowed, but the policy establishes boundaries for relationships during work hours and at the workplace. Clear relationship boundaries can help all employees feel comfortable while at work.

Employees should act professionally when representing Independent Identity, even while not at work. Employees' behavior outside of work hours should not damage the Organization's reputation. Independent Identity respects employees' use of social media and has guidelines about its use. Employees should refer to the **Social Media** policy for information about the use of disclaimers, confidentiality, and more. Interactions with traditional media outlets is subject to the **Public Relations** policy and should be handled by the Executive Director.

#### Are there any legal requirements for employees?

Employees are expected to follow all applicable law and regulations governing Independent Identity. Violating the law can result in significant harm to the Organization, including financial penalties or damage to business relationships and reputation. While legal requirements set the minimum standard, Independent Identity is committed to acting ethically in ways that positively affect people and society, and employees are expected to do the same. Employees should act in the best interests of the Organization and avoid any activities that could create, or be perceived to create, a conflict of interest.

*What rules regarding Independent Identity property must be followed?*

Proper use of Independent Identity property is important for business operations. Employees have a duty to be respectful of **Independent Identity Property**. Employees shouldn't misuse the Organization's equipment or use it frivolously. Any unauthorized use of Independent Identity property is prohibited and may result in discipline.

Employees have access to a variety of technology on the Organization's devices and systems. Cell phone use at work can be distracting and their use while driving is dangerous, so all employees must follow the Organization's **Cell Phone** policy.

Employee should also remember that they are responsible for safeguarding the Organization's confidential information during and after their employment. Employees are expected to follow the **Confidentiality and Trade Secrets** policy which can help employees identify what information is confidential and how best to protect it.

*What rules regarding Independent Identity clients and families must be followed?*

Independent Identity's work is grounded in respect for adults with intellectual and developmental disabilities and autism. Employees are expected to support client dignity, meaningful participation, safety, privacy, and independence in all work settings, including the program space, community outings, transportation, family/guardian communication, documentation, and team communication.

Employees must communicate respectfully with clients, families/guardians, coworkers, volunteers, contractors, and community partners.

Employees assigned to client-facing or clinical roles must implement assigned programming, behavior-support procedures, documentation, and data collection only within their role, training, competence, and supervision.

Employees in BACB-certified or BACB-supervised roles must maintain required credentials, comply with applicable BACB ethics requirements, practice within scope, and report any change in certification status promptly through the applicable supervision/administrative pathway.

Employees must ask the BCBA on the case for clarification when a clinical direction, behavior-support strategy, data requirement, or client-specific procedure is unclear.

### How is this policy enforced?

Employees should report any violations of this policy to Lisa Lopez. Violations of this policy may result in discipline, including termination.

### Are employees entitled to time off from work?

Employees should refer to the **Time Off** section of the Handbook for information about leave. Information about breaks can be found in the **Lactation Accommodation** policy.

### **Confidentiality and Trade Secrets**

Employees are responsible for safeguarding the Organization's confidential information during and after their employment.

### Client Confidentiality and HIPAA

As a provider of services to individuals with intellectual and developmental disabilities, Independent Identity is committed to protecting the privacy and confidentiality of client information. All employees are required to comply with the Health Insurance Portability and Accountability Act (HIPAA), applicable state privacy laws, and Independent Identity confidentiality policies.

Protected Health Information (PHI) includes any information that identifies a client and relates to their health, treatment, services, or payment for services. Employees may access, use, or disclose PHI only as necessary to perform their assigned job duties and only through approved systems and communication methods.

Client information may not be shared with family members, caregivers, outside providers, schools, agencies, or any other third party unless:

- The disclosure is authorized by the client or the client's legally authorized representative through a valid written authorization; or
- The disclosure is otherwise permitted or required by law.

Employees are responsible for safeguarding all client records, electronic information, photographs, videos, and verbal communications to prevent unauthorized access or disclosure. Any suspected breach of confidentiality or HIPAA violation must be reported immediately to a supervisor.

Failure to comply with HIPAA, confidentiality requirements, or Independent Identity privacy policies may result in corrective action, up to and including termination of employment.

### What is considered confidential business information?

Confidential business information includes non-public information that relates to the business, products, services, Independent Identity research or development, or the Organization's technical data, trade secrets, or know-how, including research, product plans, or other information regarding the Organization's products or services, markets for those products or services, customer lists and customers, software, developments, inventions, processes, formulas, technology, designs, drawings, engineering, marketing, and finances.

Confidential information does not include any information which an employee can establish:

- Was publicly known or made generally available prior to the time of disclosure by Independent Identity to the employee;
- Becomes publicly known or made generally available after disclosure by Independent Identity to the employee through no wrongful act or omission by the employee; or
- Is in the employee's rightful possession, without confidentiality obligations, at the time of disclosure by Independent Identity as shown by the employee's then-contemporaneous written records.

*How should employees protect confidential information?*

Subject to their right to engage in activities protected by law, employees may not divulge any confidential information unless it is necessary for them to perform their job. Employees may not transmit the Organization's confidential information to themselves for use with future employers. For example, employees may not email Independent Identity property to their personal email accounts, save it to their personal cloud accounts, or save it to external drives or other sources without the written permission of the Organization.

*What about confidential information or trade secrets I learned from another employer?*

Employees may not work for Independent Identity if any agreements with third parties, including prior employers, prevent them from performing the duties of their position. Employees must notify the Organization immediately if they learn that the Organization is unaware of any such existing agreement. Employees also may not work for Independent Identity if they have retained any property of their prior or concurrent employers without written permission from their prior or concurrent employer. Employees are prohibited from bringing any third-party confidential information to Independent Identity or using it in their work at Independent Identity without the Organization's written permission. Employees who use such information will be subject to disciplinary action, including possible termination. Violation of this policy may also result in legal action. Unless required by applicable law, Independent Identity won't indemnify employees who have misused the trade secrets or confidential information of others. If employees are asked during the course of their employment at Independent Identity for information relating to any of their prior employers'

business and can't answer that without providing non-public information, employees must refrain from providing that information.

*What other information do employees need to know?*

Independent Identity may, to the extent permitted by law, inspect employees' electronic equipment, including Independent Identity-provided computers, at any time to ensure compliance with Independent Identity policies.

Nothing in this policy is intended to infringe upon employees' rights to engage in [concerted activity](https://www.nlr.gov/about-nlr/rights-we-protect/your-rights/employee-rights) under Section 7 of the NLRA. <https://www.nlr.gov/about-nlr/rights-we-protect/your-rights/employee-rights>.

**Drug and Alcohol Abuse**

*How does drug and alcohol use impact the workplace?*

Independent Identity is concerned about the use of alcohol, illegal drugs, and controlled substances and their effect on the workplace. Use of these substances, whether on or off the job, can adversely affect employees' work performance, efficiency, safety, and health, and seriously impair employees' value to Independent Identity.

*What are the Organization's rules for drugs and alcohol in the workplace?*

The use or possession of these substances on the job constitutes a potential danger to the safety of other employees and exposes the Organization to the risks of property loss or damage, or injury to other people. Independent Identity strictly prohibits: (1) being impaired by alcohol while performing work for the Organization; (2) driving a Organization vehicle while under the influence of alcohol or a controlled substance; (3) distributing, selling, or purchasing an illegal or controlled substance while performing work for the Organization or on the Organization's property; (4) possessing, using, or being under the influence of an illegal or controlled substance while on the Organization premises or while performing work for the Organization; and (5) working while impaired by a prescription or over-the-counter drug if that impairment affects the employee's ability to safely or sufficiently perform the job or affects the safety of others.

*What other information do employees need to know?*

Independent Identity will make reasonable accommodations for the known physical or mental limitations of an otherwise qualified individual with a disability, unless undue hardship would result, or as otherwise required by applicable federal or state law.

Violation of this policy may result in disciplinary action, including termination. The Organization may also bring the matter to the attention of appropriate law enforcement authorities.

## **Drug and Alcohol Testing**

Independent Identity is committed to providing a safe, healthy, and productive workplace that is free from alcohol and unlawful drugs as classified under local, state, or federal laws.

Employees are prohibited from being under the influence of drugs or alcohol while on Organization premises or while operating Independent Identity-provided vehicles.

Employees who test positive for drugs or alcohol or who refuse to submit to a test may be subject to disciplinary action, up to and including termination of employment.

## **Texas Drug and Alcohol Testing**

### **Do applicants need to take a drug test?**

All job applicants are subject to drug and alcohol testing. All offers of employment with the Organization are conditioned on the applicant submitting to and successfully completing and passing a drug and alcohol test in accordance with Independent Identity's testing procedures.

### **When do employees need to take a drug test?**

Employees may be asked to submit to a drug and alcohol test if their supervisor or another person in authority has a reasonable suspicion, based on objective factors like the employee's appearance, speech, behavior, or other conduct indicating that the employee possesses or is under the influence of unlawful drugs or alcohol.

## **Employee Dating**

This policy establishes guidelines for employees who are romantically involved with a colleague. The purpose of the policy isn't to deter friendships or relationships between employees but to establish boundaries for relationships during work hours and at the workplace. Clear boundaries between personal and professional interactions can enable all employees to feel safe and comfortable in the workplace.

### **Is flirting permitted at work?**

Employees should treat other employees with respect and should not flirt in the workplace. Employees should report unwanted advances or flirting to their supervisor or Lisa Lopez. Sexual harassment is strictly prohibited. For more information on sexual harassment, see the **Equal Employment Opportunity and Anti-Harassment** policy.

### **What if 2 employees start dating?**

Dating employees should not allow their personal relationship to disrupt the workplace. During work hours and while at the workplace, dating employees should conduct themselves in a professional manner and not engage in physical contact or personal conversations that would

be inappropriate in a workplace setting. Dating employees should remain productive, focused, and committed to work.

If employees marry or enter a domestic partnership, they will be governed by the **Employment of Relatives** policy.

*What if 2 employees who were dating break up?*

If employees stop dating, they should maintain a professional relationship. Employees should not speak badly about each other, disclose details of their relationship, or engage in any other actions that disrupt the workplace.

*Do employees who start dating need to report their relationship?*

Dating employees who work in a direct supervisory relationship or in job positions in which a conflict of interest could arise must immediately disclose their relationship to their supervisor or Lisa Lopez. Additionally, any executive, manager, or other influential Organization official who is involved in a relationship with a co-worker must disclose their relationship to the Organization.

Independent Identity will review the circumstances of the relationship and notify the employees of any necessary actions. The Organization may determine whether the employees should no longer work together or require one of the employees to change job positions or departments. If the Organization is unable to reach a reasonable working situation for the employees, then one of the employees may be let go.

*What happens if employees don't follow this policy?*

Employees should report any violations of this policy to their supervisor or Lisa Lopez. Failure to follow this policy or disclose a relationship (where required) may result in disciplinary action, up to and including termination of employment.

Nothing in this policy is intended to infringe upon employees' rights to engage in [concerted activity](https://www.nlrb.gov/about-nlrb/rights-we-protect/your-rights/employee-rights) under Section 7 of the NLRA. <https://www.nlrb.gov/about-nlrb/rights-we-protect/your-rights/employee-rights>.

**Employer-Sponsored Social Events**

Independent Identity may sometimes host or sponsor social events for employees. Attendance at these events is generally voluntary unless an employee is specifically required to attend as part of their job duties.

Employees who attend a Organization-sponsored social event are expected to conduct themselves professionally and to comply with all the Organization's workplace policies, including those addressing harassment, discrimination, workplace violence, and standards of

conduct. The fact that an event takes place outside of regular working hours or away from Organization's premises does not relieve employees of their obligation to comply with the Organization's policies.

Alcoholic beverages may be served at certain Organization-sponsored social events. Employees who choose to consume alcohol at these events must do so responsibly, in moderation, and in compliance with applicable law. Employees are responsible for their own conduct and for making safe transportation arrangements following any event at which they consume alcohol. Employees who are visibly impaired should not drive and should arrange alternative transportation. Employees who are under the legal drinking age may not consume alcohol at Organization-sponsored events under any circumstances.

### **Gifts**

Because Independent Identity provides services to vulnerable adults and because some employees are subject to BACB ethics requirements, gifts from clients, families/guardians, vendors, or others connected to services must be handled conservatively. Employees may not solicit gifts, gratuities, money, gift cards, favors, or loans.

- For gifts from clients, families/guardians, supervisees, supervisors, or other clinical/service relationships, employees must follow the stricter applicable standard, including BACB-related limits where applicable.
- A personal gift valued over \$20 from a client, family/guardian, or similar service-connected source should not be accepted unless leadership determines an exception is appropriate and compliant.
- Group gifts or donations intended for the program, classroom, all staff, or general program use should be routed through the appropriate administrative process.
- Any gift that could appear to influence client treatment, assignments, recommendations, access, or professional judgment must be disclosed promptly to the employee's supervisor or the Administrative Assistant, as appropriate.

### **Open Door**

Independent Identity maintains an open door policy and encourages employees to raise work-related questions, concerns, problems, suggestions, or other matters with the Organization. The Organization also encourages employees to bring forward any concern about the conduct of a vendor, client, customer, or other third party they encounter in connection with their work.

Employees should generally first raise a concern with their immediate supervisor or manager, who is usually in the best position to understand and address it. If an employee is uncomfortable raising the concern with their supervisor or manager, believes the supervisor or manager has not adequately addressed the concern, or feels the concern involves the

supervisor or manager themselves, the employee may bring the concern to the next level of management or directly to Lisa Lopez at [admin@independentidentity.org](mailto:admin@independentidentity.org).

The Organization prohibits retaliation against any employee for raising a good-faith concern under this policy or for participating in the review or investigation of a concern raised under this policy.

### **Politics in the Workplace**

This policy applies to all Independent Identity (the "Organization") employees when acting within the course and scope of their employment with the Organization. It doesn't apply to registered lobbyists acting in their professional capacity on behalf of the Organization.

The Organization respects the right of and encourages every employee to learn about and engage in local, state, and national Political Activity. To ensure orderly operations as a tax-exempt Organization, we must place limits upon the ability to participate in political conduct while engaged in Organization affairs.

#### **What are important definitions?**

Political Activity means any activity intended to influence the outcome of an election, to advocate for or against a candidate for public office, to advocate support for or opposition to any proposed or pending legislation, or to advocate for or against a position on public policy controversies of the day.

Examples of Political Activities employees may engage in using personal time and resources (i.e., without using Organization office spaces, email addresses, computers, etc.), include, but aren't limited to, the following:

- Placing political bumper stickers on personal vehicles;
- Volunteering on political campaigns;
- Circulating and signing ballot measure petitions;
- Soliciting campaign contributions;
- Placing political yard signs at their homes; and
- Posting on personal social media sites.

Political Paraphernalia means goods such as T-shirts, bumper stickers, pins, hats, beverages, literature, or other items sold or provided to the general public in support of or in opposition to a candidate for elective office.

Political Materials means materials such as flyers, posters, newsletters, pamphlets, or other informational items intended to influence any voter in any City, County, State, or Federal Election.

Organization Resources include but aren't limited to monies, accounts, credit, facilities, vehicles, postage, telecommunications, computer hardware and software, web pages, personnel, equipment, materials, buildings, services, letterhead, marks and logos, or any other Organization items of value.

What restrictions are employees subject to?

Under state law and Organization policy, employees may not:

- Engage in Political Activity on Organization time or property;
- Engage in political discussions, while on Organization time or property, or are acting on Organization's behalf, which are disruptive or that could be viewed by others as coercive or as electioneering;
- Wear or display Political Paraphernalia unrelated to workplace matters on Organization time or property;
- Distribute Political Materials unrelated to workplace matters on Organization time or property;
- Initiate or join an affinity group sponsored by the Organization that purports to be politically aligned. Organization does not support such groups, and their existence should be reported to a supervisor;
- Manage or participate in a political campaign during work time, on Organization property, or using Organization Resources;
- Use Organization Resources to participate in Political Activity; or
- Post on social media or act in a manner that implies the Organization is endorsing any particular candidate, taking a position on any pending or proposed legislation, taking a position on any ongoing public policy controversy, or is otherwise attempting to influence the outcome of an election.

What restrictions are employers subject to?

Independent Identity won't attempt to restrict employees' Political Activity performed outside of work hours and off Organization property. Nor will the Organization:

- Post political notices, information, or threats that wages or employment are contingent upon the results of any political election;

- Deliver employee compensation together with any political slogan, motto, device, or argument intended to influence employees' political opinions or actions;
- Require employees to attend meetings or review communications whose primary purpose is to communicate an opinion on religious or political matters;
- Threaten or coerce employees to influence their political opinions or actions; or
- Otherwise interfere with employee political rights.

Nothing in this policy is intended to infringe upon employees' rights to engage in [concerted activity](https://www.nlrb.gov/about-nlrb/rights-we-protect/your-rights/employee-rights) under Section 7 of the NLRA. <https://www.nlrb.gov/about-nlrb/rights-we-protect/your-rights/employee-rights>.

For information about leave related to Political Activity, review the Voting Leave, and Political Activity Leave policies.

### **Private Work With Clients Outside Work Hours**

Independent Identity recognizes that families or guardians may independently seek private services from employees outside Independent Identity work hours. Independent Identity does not require, supervise, endorse, schedule, or assume responsibility for privately arranged work between a family/guardian and an employee.

- No employee is required by Independent Identity to provide private-pay services to any client or family/guardian.
- Private work must not interfere with the employee's Independent Identity schedule, meetings, training, documentation, assigned duties, professionalism, or performance.
- Employees may not provide preferential treatment during Independent Identity program hours to any client or family/guardian who privately hires them.
- Employees must protect confidentiality, avoid conflicts of interest, and follow applicable ethics, scope-of-practice, supervision, and boundary requirements.
- Employees should notify their supervisor of recurring private-work arrangements that may affect scheduling, boundaries, conflicts of interest, or program responsibilities.

### **Smoking**

This smoking policy is designed to help provide a safe and healthy work environment for Organization's employees, contractors, customers, and visitors.

#### **Is smoking allowed?**

Independent Identity is committed to providing a safe, healthy, and professional environment for employees, clients, volunteers, and visitors.

Smoking, vaping, and the use of other nicotine products—including cigarettes, cigars, pipes, e-cigarettes, vaping devices, and smokeless tobacco—are prohibited inside Independent Identity facilities and company-owned vehicles.

Employees who choose to use nicotine products may do so only in designated outdoor areas and in compliance with all applicable laws and organizational policies. Nicotine use must not interfere with client care, supervision, work responsibilities, or productivity.

Employees may not use nicotine products while supervising clients, transporting clients, participating in community outings, or during any activity in which client safety or supervision could be compromised.

Employees are expected to dispose of smoking materials properly and maintain a professional appearance when returning to work.

Violation of this policy may result in corrective action, up to and including termination.

#### *What are the penalties for smoking?*

All violations of this policy will be handled according to the Organization's standard disciplinary procedures, which may include termination of employment.

### **Social Media**

Independent Identity respects the right of employees to maintain blogs or web pages or participate in social media, including X (formerly Twitter), Facebook, Instagram, LinkedIn, and similar sites. However, to protect the Organization's interests, employees must adhere to the guidelines below that apply to all social media activity by employees.

#### *What are the important definitions?*

- **Internal Media Sites:** Any internal social media maintained by the Organization for its employees to communicate (for example, Slack, Microsoft Teams, etc.).
- **Social Media:** Any internet-based media created through social interaction, where users primarily produce and contribute to (rather than just consume) the content. Social media includes social or professional networking websites, blogs, virtual worlds, photo-sharing websites, and video-sharing websites.
- **Social Media Activity:** Any form of communication through social media that the employee controls that relates in any way to the Organization's operations, employees, customers, suppliers, or competitors.

### How does this policy relate to other Independent Identity rules?

All the Organization's policies – including protection of confidential and proprietary information, unlawful harassment and discrimination, workplace violence, standards of conduct, and acceptable use of computing resources – apply to employees' Social Media Activity. Employees also should not allow Social Media use to interfere with work performance.

Employees may not post photographs, videos, specific stories, names, initials, schedules, locations, treatment details, behavior information, family/guardian details, or other identifying information about Independent Identity clients on personal social media or personal websites. Consent for Independent Identity organizational use does not authorize an employee's personal posting.

- Any work-related photo or video may be taken only for an authorized work purpose and shared only through approved channels.
- Employees should not use company email addresses to register for personal social networks, blogs, or similar tools.
- Employees may not speak to the media on behalf of Independent Identity unless authorized. Please see the Public Relations section of this document for more details.

### How should employees distinguish personal activity from Independent Identity activity?

When participating in Social Media Activity that could appear to be done on the Organization's behalf, employees should make clear that the views they are expressing are theirs alone and don't reflect the views of the Organization, unless expressly authorized. If employees' Social Media Activity could appear to be authorized by the Organization, employees should use the disclaimer: "The content I have contributed to this site is my own and does not necessarily represent the views or opinions of my employer."

Employees may reference the Organization as their employer and include contact information on social and professional networking sites only, such as LinkedIn and Facebook, without posting a disclaimer. Employees should not use their Independent Identity email address to register for social media.

### What should employees avoid discussing on social media?

Employees are obligated to adhere to their confidentiality obligations to the Organization, subject to their rights to engage in protected activity under Section 7 of the National Labor Relations Act or any other legally protected activity under applicable law. Employees should not discuss confidential intellectual property information, financial information, customer details, or anything else that is subject to confidentiality obligations.

Employees also should not disclose personal or non-public contact information or post photographs or videos of employees, suppliers, or competitors without their prior written permission and the Organization's prior written approval.

#### How should employees use Internal Media Sites?

The purpose of Internal Media Sites is to give employees an opportunity to better collaborate and communicate with each other and to access information, developments, and announcements related to the Organization. Employees using Internal Media Sites should use their best judgment before contributing content.

The following guidelines apply to the use of Internal Media Sites:

- Don't post confidential information, including information about finances, strategy, trade secrets, and any other information that has not been released to the public or the Organization at large.
- Use professional judgment when linking to external web sites, text, pictures, or videos.
- Be professional.
- Don't use Internal Social Media Sites for spamming, for personal or commercial advertisements, or to transmit junk mail or bulk communications.
- Don't use Internal Media Sites to promote any outside business ventures, charities, political campaigns, religious groups, or other membership organizations. The use of Internal Social Media Sites to promote approved activities requires the prior approval of the Organization.

The Organization will monitor all content posted on Internal Media Sites and may make editorial decisions regarding the content. The Organization may edit or remove content from the Internal Media Sites that it determines to be harassing, discriminatory, unlawful, or otherwise in violation of this or any other policy. The Organization may also edit or remove content that contains spam, is inaccurate, or includes unauthorized disclosure of confidential information.

#### How is this policy enforced?

Employees will be held accountable for engaging in Social Media Activity that violates this policy. Failure to comply with this policy may result in disciplinary action, including termination. The Organization may report suspected unlawful conduct to law enforcement.

#### What isn't prohibited by this policy?

This policy won't be applied in a manner that interferes with [employees' rights](#) under Section 7 of the National Labor Relations Act or with their right to engage in any other legally protected

activity. Nothing in this policy will prohibit employees from discussing their wages, benefits, or other terms and conditions of their employment. Furthermore, nothing in this policy will in any way limit or prohibit employees from disclosing information pertaining to sexual harassment or any other unlawful conduct in the workplace.

### **Employee Ideas, Innovation, and Professional Collaboration**

Independent Identity values innovation, continuous learning, and professional collaboration. Employees are encouraged to share ideas that may improve client services, workplace efficiency, employee experience, safety, or organizational performance.

Employees who develop ideas through their work experience, continuing education, conferences, trainings, professional literature, or other learning opportunities are encouraged to discuss those ideas with their supervisor or the appropriate member of the leadership team.

Independent Identity also recognizes the importance of maintaining clear clinical and operational leadership. Clinical programming, treatment decisions, assessments, behavior intervention plans, and other clinical services are directed by the supervising Board Certified Behavior Analyst (BCBA) or designated clinical leader. Business operations, staffing, scheduling, and organizational decisions are directed by supervisors, directors, and executive leadership within their respective areas of responsibility.

Employees are encouraged to ask questions, seek clarification, and offer suggestions in a respectful and professional manner. Suggestions should be shared through the appropriate supervisory channels and at appropriate times. Once a clinical or operational decision has been made, employees are expected to implement that direction consistently unless there is an immediate concern involving client safety, legal compliance, or ethical obligations.

Nothing in this policy prevents an employee from reporting concerns related to client safety, abuse, neglect, fraud, legal compliance, or violations of professional ethics. Employees are expected to report such concerns immediately through the appropriate reporting channels.

Any idea, suggestion, improvement, invention, work of authorship, design, process, computer program, or other intellectual property developed by an employee during work time, using Independent Identity property, equipment, supplies, facilities, confidential information, or that relates to the organization's business or anticipated research or development, remains the property of Independent Identity.

### **Weapons in the Workplace**

Independent Identity respects the right of employees to keep and maintain weapons for self-defense. However, to ensure a safe working environment employees must adhere to the guidelines below.

#### **Are firearms allowed in the workplace?**

Ensuring a safe work environment and preventing workplace violence is of the highest importance to Independent Identity (the "Organization"). Having weapons in the workplace poses a potential threat to the safety and security of employees, customers, contractors, and visitors. Firearms and other dangerous weapons are strictly prohibited at all times on Organization property and while employees are working, whether on-site or off-site.

Are there any important definitions?

Organization property means all Independent Identity-owned or leased property, including vehicles, buildings, parking lots, workspaces, and all other property controlled by Independent Identity.

Other dangerous weapons include explosives, large knives, and other fighting or defensive weapons that might be considered dangerous or that could cause serious harm.

Can firearms be kept in private vehicles?

***Texas employees may store legally owned firearms in personal vehicles as long as the vehicles remain locked and the firearms aren't removed or brandished.***

State law requires Independent Identity to allow employees to transport or store lawfully possessed firearms in their privately owned vehicle while that vehicle is in Independent Identity parking areas if certain conditions are met. Employees may keep firearms in employee-owned vehicles only if all the following requirements are satisfied:

1. The employee's vehicle is allowed to be operated or parked in the lot;
2. The employee is legally permitted to own and carry the firearm;
3. The firearm is unloaded; and
4. The firearm is kept out of sight and locked in a compartment or container inside the vehicle or in a compartment or container securely attached to the vehicle.

Unless all requirements are met, possession of a firearm in any vehicle in Organization-controlled parking lots is prohibited.

Are other weapons allowed?

Employees are responsible for ensuring that any item they possess isn't prohibited by this policy. Review the definitions section above for a list of dangerous weapons. Scissors, box cutters, and other small-bladed tools that are important for employees to adequately perform their job duties are permitted. If employees are unsure whether something is prohibited on Independent Identity property, they should contact [admin@independentidentity.org](mailto:admin@independentidentity.org) for clarification before bringing it to work. Independent Identity understands that some employees

may feel unsafe in the workplace with no means to defend themselves. Therefore, the following defensive tools may be brought to the workplace if they are possessed legally, kept out of sight when possible, and not misused: pepper spray, small pocket knives or multi-tools with blades below 2 inches in length, box cutters, scissors, or utility knives required for job duties.

*What if someone else brings a weapon to work?*

Employees must immediately report any violation of this policy, including employee possession of any prohibited weapon on Independent Identity property or while working, to their supervisor or admin@independentidentity.org. The Organization will take any necessary steps to ensure the safety of all Independent Identity people.

*What are the penalties for violating this policy?*

All violations of this policy will be handled according to the Organization's standard disciplinary procedures, up to and including termination of employment.

**Workplace Violence**

Independent Identity has no tolerance for acts and threats of violence among employees or on the Organization's premises. All violent acts, even those made as a joke, will be taken seriously and could lead to termination. Threats may be direct or indirect, and they may be made verbally or nonverbally. It is every employee's responsibility to help maintain a violence-free work environment. Employees are expected to report to a supervisor all threatening or violent workplace incidents. Independent Identity will review all reports of workplace violence and conduct investigations as appropriate. Independent Identity will take appropriate remedial action to address any workplace violence.

**Workplace Rules**

**Authorization for Use of Personal Vehicle**

Independent Identity may require or authorize employees to operate their personal vehicle in the course of their job duties, including for errands, travel between work locations, or travel to client or customer sites. Employees who do so must comply with this policy.

*What are the requirements for operating a personal vehicle on the job?*

Any employee who operates a personal vehicle on the job must hold and maintain a valid driver's license, maintain a driving record acceptable to the Organization, and maintain valid auto insurance covering business use of the vehicle. Operating a personal vehicle on the job without meeting these requirements is prohibited.

*What information must employees provide?*

The Organization may obtain a motor vehicle report at any time during employment to verify continued eligibility to drive on the job, subject to applicable law, including any consent or notice requirements. Employees must provide a current copy of their driver's license and proof of valid auto insurance upon hire and upon request, and must promptly provide updated copies whenever their license, coverage, or insurance carrier changes.

Employees must immediately report to Lisa Lopez at [admin@independentidentity.org](mailto:admin@independentidentity.org) any change to their driver's license or driving record, including suspensions, revocations, restrictions, expirations, citations, accidents, or convictions, as well as any lapse, cancellation, or non-renewal of their auto insurance.

#### *What conduct is prohibited?*

Employees may not operate any vehicle on the job while under the influence of alcohol, illegal drugs, marijuana, or any prescription or over-the-counter medication that impairs their ability to drive safely. Employees may not text, read or send email, or otherwise use a hand-held mobile device while driving on the job. Use of a mobile device while driving is permitted only with a hands-free device and only to the extent permitted by applicable law.

#### **Background Checks**

Background checks help Independent Identity gain insights into applicants' backgrounds, ensure that we hire reliable employees, verify applicants' truthfulness and accuracy, and screen candidates convicted of serious criminal behavior. Independent Identity conducts background, registry, and exclusion checks for employees, contractors, and volunteers as required by law, funder requirements, licensing obligations, and client-safety standards. Checks may include criminal background screening, state registries, misconduct or abuse registries, and federal or state exclusion lists.

#### *How do we use background checks?*

Offers of employment or promotions at Independent Identity may be contingent upon clear results of a background check, as deemed necessary and as permitted by law. Whether a background check is required for a position or promotion will be indicated in the job posting. All final candidates for the position or promotion will be subject to a background check, without discrimination.

#### *What is included in our background checks?*

Unless otherwise prohibited by law, background checks may include:

- Social Security number, date of birth, and former addresses;
- Prior employment (up to 2 employers or 5 years), including dates of employment; positions held; reasons for departure and eligibility for rehire;

- Personal and professional references;
- Educational information, including the years attended and the degree/diplomas received;
- Criminal history, including the number of convictions, nature of convictions; and time since convictions;
- Motor vehicle records, including driving history (if the position involves driving); or
- Credit history (if the position involves managing or handling Independent Identity funds, cash, or credit cards).

What process do we use for background checks?

Independent Identity will comply with all applicable legal requirements when conducting background checks. Applicants will be asked to provide written permission before we conduct a background check. We will order the background check from a reputable background check provider.

Lisa Lopez will review the results of the check and notify the hiring manager and the applicant of the results. The hiring manager will assess the potential risks and liabilities related to the jobs requirements and determine whether the applicant should be hired.

Individuals who are barred, excluded, revoked, listed on a disqualifying registry, or otherwise ineligible under applicable law or Independent Identity requirements may be ineligible for employment, assignment, volunteer service, or continued engagement. If Independent Identity determines not to hire or promote an applicant based on the results of a background check, we will comply with any applicable Fair Credit Reporting Act (FCRA) requirements. Background check information will be maintained in a file separate from employees' personnel files.

Independent Identity reserves the right to modify this policy at any time without notice.

**Bulletin Boards**

Independent Identity maintains a bulletin board in the day room hallway. The bulletin board is used to display labor law and other postings required by applicable federal, state, or local law, along with workplace announcements, safety information, and other communications from the Organization to employees.

Employees should check the bulletin board regularly for new postings. Employees may not post, remove, alter, or cover any item on the bulletin board without prior authorization from Lisa Lopez at [admin@independentidentity.org](mailto:admin@independentidentity.org). Nothing in this policy is intended to restrict any right that employees have under applicable law, including the right to engage in protected concerted activity, such as discussing wages, hours, and other terms and conditions of employment with one another.

## **Business Expense Reimbursement**

This policy is intended to provide employees with a clear understanding of the Organization's policies and procedures related to the reimbursement of business-related expenses. Employees should review and adhere to these guidelines. It's important for employees to always use good judgment and exercise careful stewardship over the Organization's assets and make good decisions about incurring and submitting business expenses.

### **What expenses are eligible for reimbursement?**

Employees must exercise common sense when incurring and submitting expenses on the Organization's behalf. Independent Identity may refuse to reimburse an expense if it's found to be unnecessary for conducting business or for personal use. Independent Identity will reimburse an employee for business expenses that are:

- Directly attributable to conducting Independent Identity business;
- Necessary for the employee's job performance;
- Not extreme or excessive;
- Reasonable, and reflective of a prudent decision to incur the expense;
- Properly documented, substantiated, and submitted timely, and
- Approved as necessary in accordance with this policy.

Whether an expense is deemed "necessary" for the performance of the employee's job will be determined by Independent Identity in its reasonable, good faith discretion and may differ depending on the state where the employee works.

Independent Identity will also reimburse non-exempt employees for any expense primarily for the Organization that brings an employee's wages below minimum wage requirements.

To the extent possible, employees should contact their supervisor or Lisa Lopez at [admin@independentidentity.org](mailto:admin@independentidentity.org) with questions about reimbursement for a particular expense prior to making any purchase.

### **Do expenses need to be approved in advance?**

All employees must receive prior written approval of any expense of more than \$50. Prior approval isn't required for smaller expenses.

If Independent Identity reasonably determines that a given expense does not qualify for reimbursement, it won't be reimbursed even if the purchase is already made.

### How should employees submit reimbursement requests?

Business expense reimbursement requests must be submitted to your supervisor. All requests must be submitted within 30 days of the expense being incurred. Reimbursement will be made using the same method by which employees are usually paid.

Reimbursement requests must be supported by receipts. Independent Identity won't reimburse employees for any expenses that aren't substantiated by a valid receipt or invoice, except in exceptional circumstances (such as when a receipt is lost or otherwise unavailable) and only then after the employee has provided sufficient alternate support for the expense. Additionally, to comply with Internal Revenue Service regulations, business expenses must be supported by adequate records. This support must include information relating to:

- Amount of the expenditure,
- Time and place of the expenditure,
- Business purpose of the expenditure, and
- Names and the business relationship of individuals, other than the employee, for whom the expenditure was made.

### What other information do employees need to know?

Violation of this policy may result in disciplinary action, possibly including termination of employment.

Independent Identity won't be liable for any taxes or penalties on any reimbursements.

### **Client-Behavior Damage Reimbursement**

Independent Identity may reimburse certain employee property damage caused by client behavior during assigned work, subject to approval, documentation, and the reimbursement procedure.

Staff clothing destroyed by client behavior may be reimbursed up to \$30 per item.

Prescription glasses destroyed by client behavior may be reimbursed up to the cost of replacing the same prescription.

If a personal vehicle interior is soiled during approved client transportation, professional cleaning may be reimbursed when approved by the supervisor before cleaning occurs.

Employees must follow the expense reimbursement procedure and provide required documentation.

This policy is intended to provide employees with a clear understanding of the Organization's policies and procedures related to the reimbursement of business-related expenses. Employees should review and adhere to these guidelines. It's important for employees to always use good judgment and exercise careful stewardship over the Organization's assets and make good decisions about incurring and submitting business expenses.

### **Business Travel**

Employees may be required or authorized to travel on behalf of Independent Identity for conferences, trainings, professional development, meetings, fundraising activities, community partnerships, or other approved business purposes.

All business travel must receive prior approval from the Executive Director or an authorized supervisor. Employees are expected to use sound judgment when incurring travel-related expenses and represent Independent Identity professionally at all times.

Reimbursement for approved travel expenses will be provided in accordance with the Independent Identity Travel and Expense Reimbursement Procedures. Employees are responsible for submitting required documentation and receipts within established timelines.

Employees traveling on behalf of Independent Identity are expected to comply with all organizational policies, including confidentiality, professional conduct, vehicle safety, and expense reimbursement requirements.

Additional procedures regarding mileage reimbursement, conference attendance, meals, lodging, registration, and travel approvals are maintained in the Independent Identity Procedures Manual.

### **Independent Identity Property**

All property of Independent Identity must be maintained in good working order and in accordance with the Organization's rules and regulations. Independent Identity may inspect all property to ensure compliance with its rules and regulations without notice to employees or in employees' absence. Prior authorization must be obtained before any Organization property may be removed from the premises. Personal property brought onto Independent Identity premises is subject to inspection as permitted by applicable law.

Upon termination of employment or upon request by Organization, employees must (1) return all Independent Identity property immediately and (2) conduct a thorough search of their homes, personal computers and phones, cars, cloud accounts, tablets, external drives, personal emails, and any other place where Independent Identity property may reside and return the property immediately. Employees who fail to comply with this policy may be subject to discipline or legal action.

### **Driving Record**

Employees whose job duties require them to operate a motor vehicle for Independent Identity must hold and maintain a valid driver's license and an acceptable driving record.

Subject to applicable law, including any consent or notice requirements, the Organization may obtain a motor vehicle report at any time during employment to verify an employee's driving record and continued eligibility to drive for the Organization's. Employees must provide a current copy of their driver's license to Lisa Lopez at [admin@independentidentity.org](mailto:admin@independentidentity.org) for inclusion in their personnel file upon hire and upon request. Employees must promptly provide an updated copy whenever their license is renewed, modified, or replaced.

Employees who operate a personal vehicle for the Organization's business must maintain valid auto insurance covering that use and must provide the Organization with current proof of coverage upon hire, upon renewal, upon any change in carrier or coverage, and upon request.

Employees must immediately report to Lisa Lopez at [admin@independentidentity.org](mailto:admin@independentidentity.org) any change to their driver's license, driving record, or auto insurance, including suspensions, revocations, restrictions, expirations, citations, accidents, convictions, or any lapse, cancellation, or non-renewal of insurance coverage.

### **Employee Classification**

This policy summarizes the different categories of employment at Independent Identity. An employee's categories may affect whether they are eligible for benefits, and which policies and laws apply to them. Employees will be informed of their categories when hired and notified if their categories changes.

#### **What are the different categories under wage and hour laws?**

Under federal and state wage and hour laws, employees are categorized as either "exempt" or "nonexempt."

- **Nonexempt Employees:** Employees whose work is covered by the Fair Labor Standards Act (FLSA). These employees are typically paid by the hour and are eligible for overtime.
- **Exempt Employees:** Employees who don't receive overtime pay and generally receive the same weekly salary regardless of hours worked.

#### **What are the different categories based on work schedule?**

In addition, employees fall within one of the classifications below:

- **Full-Time Employees:** Employees who regularly work the Organization's full-time schedule who were not hired on a temporary or short-term basis. Full-time employees are generally eligible for all Organization benefits.

- **Part-Time Employees:** Employees who regularly work fewer hours than the Organization's full-time schedule who were not hired on a temporary or short-term basis. Part-time employees may be eligible for some of the benefits offered by the Organization, subject to the terms and conditions of each benefit program.
- **Short-Term or Temporary Employees:** Employees who were hired for a specific, short-term project, or on a short-term freelance, per-diem, or temporary basis. Short-term or temporary employees generally aren't eligible for Organization benefits. Employment beyond any initially stated period does not imply a change in employment status.
- **On-Call Employees:** Employees who work only when called. On-call employees are generally not eligible for Organization benefits.

### **Health and Safety**

Independent Identity takes seriously the health, safety, and welfare of every person who enters the workplace. Employees must comply with the Organization's workplace safety rules and guidelines. Failure to follow the Organization's health and safety protocols may result in discipline, including termination.

### **What are employees' responsibilities?**

Employees are responsible for promptly reporting safety concerns, client incidents, accidents, injuries, suspected abuse, neglect, exploitation, rights violations, and other reportable concerns according to Independent Identity policy and applicable law. To help Independent Identity maintain a safe and healthy workplace, employees must:

- Be responsible for working safely and carrying out their duties with the skill and care necessary to not injure themselves or anyone else;
- Monitor their health on a daily basis and stay home if they are feeling sick, except to get medical care;
- Avoid close contact with people who are sick;
- Always cover their mouth and nose with a tissue when they cough or sneeze or use the inside of their elbow;
- Wash their hands often with soap and water for at least 20 seconds to reduce the spread of germs;
- Clean and disinfect frequently touched surfaces often;
- Keep their work area clean, organized, and free from clutter or tripping hazards;

- Use any tools and equipment designated for their work and ensure the tools are kept in good condition;
- Report any unsafe conditions, potential hazards, or other safety concerns (whether they exist on the Organization's premises or employees' home offices) to their supervisor; and
- Report any workplace injury, accident, illness, or near miss.

#### How are reports made?

Employees must report to their supervisor any unsafe conditions, injury, or illness as soon as possible, but no later than 8 hours after becoming aware of the issue. If the supervisor is unavailable, report to Lisa Lopez at [admin@independentidentity.org](mailto:admin@independentidentity.org). Independent Identity prohibits any form of discipline, discrimination, or retaliation for reporting a health and safety concern or a violation of this policy or for cooperating in related investigations. Independent Identity or its insurer won't be liable for the payment of workers' compensation benefits for any injury that arises from an employee's participation in any off-duty activity that isn't part of the employee's work-related duties.

Incident and injuries should be reported based on Independent Identity procedures.

#### **Inclement Weather**

The safety of our employees is our top priority. We try to remain open during standard business hours, but in the event of severe weather or hazardous commuting conditions, Independent Identity may close, delay opening, or dismiss early. II will follow the closure decisions of Austin Independent School District.

If an office will be closed or opening late, a text message will be sent to all staff, guardians and parents who have signed up and a notification will be posted on II's website at [www.independentidentity.org](http://www.independentidentity.org) and on the Facebook and Instagram pages. Please check the office status before starting your commute during severe weather events. If your office is officially closed due to weather, employees who are able to work from home are expected to do so. If remote work is not possible, all impacted employees are required to use mental health paid leave or take unpaid leave.

Please use your best judgment when assessing travel conditions. Don't attempt to travel if you believe conditions are dangerous, regardless of your office status. If your office remains open, but you feel your specific commute is unsafe, notify your manager immediately. If permitted for your role, you may request to work from home. If you can't work remotely, you must use your available paid leave or take unpaid leave for the missed time.

#### **Key and Access Cards**

All employees are responsible for maintaining security at Independent Identity workplaces. Employees may receive a key or access card to enter Independent Identity workplaces. Employees must use keys or access cards according to this policy and any other instructions provided by Independent Identity. Employees should never loan or duplicate a key or access card or unlock a building or room for another person unless the employee knows that individual is authorized to enter.

Employees should report lost, stolen, or misplaced keys or access cards to employees' supervisors immediately. Employees are responsible for the cost of replacement. All keys and access cards must be returned to Independent Identity upon separation.

### **Pets in the Workplace**

Independent Identity understands that pets can be an important part of employees' lives. We are, however, currently unable to allow pets in our workplace, with one important exception. Service animals may enter the workplace with approval from the Clinical Director. Service animals are dogs that have been individually trained to do work or perform tasks for the benefit of an individual with a disability. If you have questions about this policy or want to seek approval to bring a service animal to the workplace, please contact the Clinical Director at [tina.ulrich@independentidentity.org](mailto:tina.ulrich@independentidentity.org).

### **Products and Services Knowledge**

Independent Identity expects all employees to maintain a working knowledge of the products and services that the Organization offers, including their features, benefits, and intended uses. Familiarity with the Organization's offerings helps employees serve customers effectively; identify opportunities to add value; and represent the Organization well in their interactions with customers, vendors, and the public.

Employees are also encouraged to learn about the work of other departments and how their own role contributes to the Organization's overall operations. Every employee represents the Organization and its brand, and the knowledge, professionalism, and engagement of each employee contributes to the Organization's reputation and success.

### **Public Relations**

Independent Identity strives to have consistent, accurate, and complete information provided to media sources. All media inquiries regarding Independent Identity must be referred to the Executive Director at [jenna.taylor@independentidentity.org](mailto:jenna.taylor@independentidentity.org). Only the Executive Director is authorized to issue and approve public statements on behalf of Independent Identity. This policy includes all forms of responses to the media, including "off the record" and "anonymous" statements. No employees, unless specifically designated by the Executive Director, are authorized to make statements on behalf of Independent Identity.

Failure to follow this public relations policy may result in discipline, including termination. Nothing in this policy is intended to infringe upon employees' rights to engage in [concerted activity](https://www.nlr.gov/about-nlr/r-rights-we-protect/your-rights/employee-rights) under Section 7 of the NLRA. <https://www.nlr.gov/about-nlr/r-rights-we-protect/your-rights/employee-rights>.

### **Dress and Personal Appearance**

Independent Identity regards employees as representatives of the organization and role models for clients. Employees are expected to use good judgment in dress, grooming, and personal appearance so that they are neat, clean, professional, safe, and appropriate for the work being performed.

- Clothing should allow the employee to perform assigned duties safely, including movement, client support, community participation, and emergency response.
- Clothing or accessories with sexually explicit, suggestive, drug/alcohol-related, demeaning, discriminatory, or otherwise inappropriate words or symbols are prohibited.
- Employees working directly with clients must wear safe footwear. Open-toed shoes, heels, elevated platforms, slippers, or other unsafe footwear are not appropriate for direct client work.
- Exposed body piercings other than small earrings or studs may be restricted for employees working directly with clients when safety is a concern.
- Employees may be asked to change if their clothing or appearance does not meet this policy. Time away from work to change may be unpaid unless otherwise required by law

### **Punctuality and Attendance**

Employees are expected to report to work (whether in person or remote) as scheduled, on time, and prepared to start work. Employees also are expected to remain at work (or logged in and online) for their entire workday, except for meal periods or other authorized leave or time-off. Late arrival, early departure, or other absences from scheduled hours are disruptive and must be avoided whenever possible. If employees are unable to report for work on any particular day, employees must contact their supervisor at least 1 hour before the start of their shift. If they call with less than 1 hour's notice, it counts as a tardy. If employees know in advance that they will be absent, employees must schedule the absence in accordance with the applicable leave or time off policy. If employees are absent for 3 consecutive workdays without contacting their supervisor, employees will be considered to have voluntarily terminated their employment. Excessive absences, abuse of the Organization's leave policies, failure to report absences on time, and excessive tardiness may lead to discipline, including termination.

### **Remote Working**

Independent Identity recognizes that certain positions may perform some job duties remotely when appropriate and approved. Remote work is not an entitlement or employee benefit but a flexible work arrangement that may be approved based on business needs and job responsibilities.

#### Who is eligible to work remotely?

Eligible BCBA's and Directors may participate in remote work in accordance with the organization's Remote Work Guidelines established by the Executive Director. Work from home is limited to salaried employees in the following positions: BCBA, Directors and Executive management in addition to hourly administrative employees. An employee may work remotely if they are able to perform their job responsibilities from another location in an engaged, productive, and satisfactory manner, as determined by Independent Identity in its sole discretion. Except when notified by Independent Identity not to come to the workplace or where individual arrangements have been made, employees may only work remotely after they submit a written request to Lisa Lopez at [admin@independentidentity.org](mailto:admin@independentidentity.org) and Independent Identity grants the request.

The written request to work remotely must include: (1) an acknowledgment that the employee has read and reviewed this remote working policy, (2) the requested start and end dates of the requested remote working arrangement, (3) the reason(s) why the employee is requesting to work remotely, (4) the location(s) from which the employee would like to work remotely, and (5) a complete list of any equipment, services, and other accommodations the employee needs to effectively perform his or her job responsibilities from the remote location(s).

#### What type of workspace is required for remote work?

Employees permitted to work remotely must maintain a proper, hazard-free work environment that is conducive to their job productivity. The remote employee is responsible for ensuring that they have a safe, professional, and ergonomically sound workspace by ensuring they have appropriate lighting, a sufficient work surface to accommodate all equipment, an appropriate chair, and any other amenities they may require. Independent Identity may inspect remote work locations to ensure that they are proper, hazard-free work environments in good working order. Employees may not conduct in-person meetings with customers, clients, or other employees in their home or other remote locations without written consent from the Organization.

#### What if an employee is injured while working remotely?

Workers' compensation coverage applies only to injuries that arise out of and in the course of performing authorized work duties. Independent Identity does not extend workers' compensation coverage to personal activities or injuries occurring outside the performance of approved work responsibilities while working remotely. Employees are responsible for maintaining a safe home workspace.

### What are the time keeping requirements for remote work?

Remote work is available only to salaried (exempt) employees. Non-exempt employees are not eligible for routine remote work unless in an administrative position or specifically authorized by the Executive Director for a temporary business need and must comply with all timekeeping requirements. All non-exempt employees must continue to comply with Independent Identity timekeeping policies when working remotely and follow their regular work schedules as provided by their supervisor. Employees must record all hours worked. Employees must obtain their supervisor's prior approval before working overtime or other hours outside of their regular work schedules. Employees must keep accurate time records, turn them in when they are due, and otherwise comply with the Organization's timekeeping policies. Independent Identity retains the right to modify employees' work schedules. Employees who fail to comply with this policy or who work unauthorized overtime may be subject to discipline, up to and including termination of employment.

### What are the communication requirements for remote work?

Employees must be responsive and available by phone and email during normal business hours unless their job responsibilities don't permit them to be. Independent Identity considers normal business hours to be from 8:00 AM to 4:30 PM, Monday through Friday. Employees also must remain available to attend meetings, either remotely or in person, as determined by their supervisor. Employees permitted to work remotely are responsible for maintaining the same professional, effective, and efficient communications and workflow with supervisors, co-workers, and customers in their remote workplace as they would at Independent Identity workplace. Remote employees must keep their supervisor informed of ongoing projects, assigned tasks, and project statuses. Remote employees' supervisors, along with Lisa Lopez, will monitor productivity and work product quality.

### What are the information security requirements for remote work?

Employees should review and abide by any Independent Identity policies that describe the Organization's requirements for security and the use of all equipment, information, and data access. Remote employees remain responsible for taking the necessary precautions to ensure that the Organization's confidential and proprietary information remains secret. For example, if an employee has any confidential or proprietary Independent Identity files or information in paper form, these documents must be kept in a locked filing cabinet or otherwise properly secured and inaccessible to others when not in the employee's immediate possession. Employees must shred and dispose of all documents containing confidential and proprietary information in accordance with the minimum standards set by the Organization. Because many home shredders don't meet the Organization's minimum standards, remote employees may be required to bring paper to the workplace to be shredded.

All Independent Identity equipment, Independent Identity information, and Independent Identity data stored in an employee's home office or on their personal electronic devices

remains the property of the Organization. Independent Identity may inspect Independent Identity-issued electronic devices as well as employees' personal electronic devices which they use to store Independent Identity information or to conduct Independent Identity business. Independent Identity-issued equipment should only be used in accordance with Independent Identity policy.

*Can employees take care of children or dependents while working remotely?*

Remote working isn't designed to be a replacement for child or dependent care. Employees must manage childcare, dependent care, and personal responsibilities in a manner that allows their job responsibilities to be met in an efficient, professional, and otherwise satisfactory manner. Employees working remotely are responsible for making appropriate arrangements, so they are able to adequately perform their job responsibilities during normal business hours.

*Do employees who work remotely still need to comply with Independent Identity policies?*

Remote working does not alter employees' obligations to comply with all Independent Identity policies and procedures and does not alter an employee's employment status.

*What happens if employees violate this policy?*

Violation of any terms of this remote working policy may result in the loss of remote working privileges. Independent Identity retains the right to require remote workers to report to Independent Identity workplace and to discontinue the remote working arrangement at any time, for any reason, or for no reason at all.

## **Wages and Scheduling**

### **Direct Deposit**

Independent Identity requires employees in all states to receive paychecks through direct deposit.

Upon hire, employees will be given a direct deposit authorization form.

Employees who aren't required to use direct deposit can opt out by submitting a written request to Independent Identity asking to be paid by check.

### **Overtime**

Employees should expect to work overtime only when absolutely necessary. Non-exempt employees who work overtime are eligible for overtime pay, but exempt employees aren't. Independent Identity will provide compensation for all overtime hours worked by non-exempt employees in accordance with applicable law.

### Who is eligible for overtime?

All employees can work overtime hours, but only employees who aren't exempt under the federal Fair Labor Standards Act are eligible for overtime pay.

Employees who aren't sure whether they are eligible for overtime pay should ask their supervisor for more information.

### How much is overtime pay?

Overtime pay is equal to 1.5x employees' normal wage for all employees.

### How many hours do employees need to work before getting overtime pay?

Eligible employees in all states will receive overtime pay for all hours they work over 40 in 1 week.

### What notice do employees need to provide before working overtime?

Eligible employees must ask their supervisors for permission to work any hours that would qualify them for overtime pay. Employees should work overtime hours only once they obtain permission from their supervisor to do so.

### What other information do employees need to know?

If non-exempt employees work overtime without permission, they may be subject to disciplinary action, possibly including termination of employment.

Non-exempt employees earn overtime of 1.5x their regular wage for each hour over 40 that they work in 1 week.

### **Payment of Wages**

Employees will be paid every other Friday for work performed during the previous 2 week pay period, or on a less frequent period if contemplated in the employee's offer letter or employment agreement and as permitted by applicable law. If a regular payday falls on a holiday or weekend, employees will be paid on the preceding workday. Independent Identity does not permit advances against paychecks or against any paid time off employees may have available.

### **Payroll Deductions**

The law requires Independent Identity to withhold pay when legally required, such as for federal income tax, state income tax, the Federal Insurance Contributions Act (FICA), Social Security, Medicare, and state disability insurance. Employees should contact Lisa Lopez to change their exemptions or marital status for income tax withholding purposes.

Employees who believe that an improper deduction has been made to their salary should immediately report this information to their direct supervisor or to Lisa Lopez at [admin@independentidentity.org](mailto:admin@independentidentity.org). Reports of improper deductions will be promptly investigated. If it is determined that an improper deduction was made, employees will be promptly reimbursed.

### **Salary Pay for Exempt Employees**

Subject to any exceptions provided by law, salaried exempt employees will receive their salary for any week in which they perform any work. An exempt employee's salary is intended to pay for all hours worked during each pay period, regardless of the employee's scheduled or tracked hours. Independent Identity will comply with the salary requirement of the Fair Labor Standards Act and applicable state law.

### **Timekeeping Requirements for Non-Exempt Employees**

All non-exempt employees must clock in and clock out at the beginning and end of each shift, meal break, or any other unpaid break. Independent Identity will prepare and maintain time records for each pay period. These time records will be made available to supervisors of non-exempt employees for approval each Friday before payday. Employees must keep accurate time records and make sure they are complete and finalized at the end of each week. Any corrections to an employee's time records must be submitted to the administrative assistant and confirmed by the employee. Any unpaid time off must be reported to the employee's supervisor. Clocking in or out for another employee or falsifying time records is fraudulent and may lead to immediate termination of employment.

### **Workweek and Work Schedules**

The Organization's workweek runs from 12:00 AM on Monday through 11:59 PM on Sunday. Independent Identity is normally open for business between the hours of 8:00 AM and 4:30 PM, Monday through Friday. Supervisors will assign employees their individual work schedules.

### **Time Off**

This section explains when employees can take time off work.

Unless defined differently in a policy, the Organization's benefit year for leave is: the calendar year.

### **Holidays**

Independent Identity observes the following holidays each year: Martin Luther King Day, Memorial Day, Independence Day, Labor Day, Veteran's Day, New Year's Eve, Good Friday, New Year's Day, Thanksgiving Day, Friday after Thanksgiving, Christmas Eve, and Christmas Day.

When a holiday falls on a Saturday, it is usually observed on the preceding Friday. If a holiday falls on a Sunday, it is usually observed on the following Monday.

### **Paid Time Off**

Independent Identity believes that taking time away from work is essential to staying healthy, happy, and productive. This policy is designed to give employees the flexibility to take the time they need—whether it's for rest, travel, personal matters, family commitments, or just to recharge. We trust employees to use leave in a way that works best for them and their team, and we encourage employees to plan ahead so they can fully enjoy their time away.

Taking care of oneself outside of work helps employees bring their best self to work—and we're committed to supporting that balance.

#### **Who can take this leave?**

All full time and part- time company employees are eligible for this leave.

#### **How much leave do employees get?**

PTO access begins after the introductory period unless a law or approved policy provides otherwise. Part-time employee PTO is prorated based on regular schedule.

| <b>Employee group</b> | <b>Sick days</b> | <b>Vacation days</b>                                 | <b>Mental health days</b> |
|-----------------------|------------------|------------------------------------------------------|---------------------------|
| Hourly                | 5 per year       | 5 per year                                           | 3 per year                |
| Salary                | 5 per year       | 6 per year                                           | 4 per year                |
| Director              | 5 per year       | Unlimited, subject to approval and operational needs | 4 per year                |

Employees must follow the current PTO request and call-out procedure, including the required system or form.

PTO misuse, excessive unscheduled absences, or patterns of tardiness may result in coaching, corrective action, or discipline.

Unused PTO, rollover, bonus time, and separation treatment are governed by the current approved policy and applicable law.

#### **Will unused leave be carried over to the next year?**

Employees can carry over up to one (1) additional vacation OR sick/MH day per full year of employment of their unused paid time off to the next year, up to a total cap of 136 hours (the "Total Cap") .

#### *Rollover Benefit for Continued Employment*

To reward loyalty and tenure, staff may carry over one (1) additional vacation or sick day per full year of employment , up to a maximum of five (5) days . Example: A staff with 3 years of service may roll over up to 3 unused vacation/PTO days into the next calendar year. Bonus time must be used within 12 months of being earned. Employees on performance improvement plans are ineligible for bonus PTO during that review period.

#### *Will unused leave be paid out at the time of separation?*

Unused paid time off won't be paid out at the time of separation, except as prohibited by law.

#### *When do employees need to provide notice?*

Vacation should be requested at least two weeks in advance and is subject to supervisor approval, operational needs, staffing, and client needs.

Mental health days should be requested at least 3 days in advance when possible and is subject to supervisor approval, operational needs, staffing, and client needs.

Sick time use should only occur in truly unforeseen events and is intended for illness, injury, medical needs, or unforeseen personal emergencies. Employees must plan to report their unplanned absence between the hours of 5:00am and 7:00am if not sooner to allow for scheduling adjustments to be made. Failure to follow this procedure may result in disciplinary action up to and including termination of employment.

Approval of leave requests is based on the Organization's needs and other employees' requests for paid time off and leave of absence. All requests must be approved in writing by the employee's supervisor.

#### *What is considered appropriate Attendance and Responsible Use of Paid Time Off?*

Employees are expected to use Paid Time Off (PTO) responsibly and maintain reliable attendance. Patterns of unscheduled absences, excessive tardiness, or frequent last-minute call-outs may be reviewed with the employee and may result in coaching or corrective action.

Employees who are absent for more than five (5) consecutive scheduled workdays due to illness or injury may be required to provide a healthcare provider's release confirming they are medically able to return to work before resuming their duties.

PTO is intended to support planned time away from work. Repeated use of unpaid time off after an employee has exhausted their PTO balance, excessive unscheduled absences, or failure to follow attendance and call-in procedures may be considered misuse of leave and may result in corrective action, up to and including termination.

Because Independent Identity provides direct services to individuals who rely on consistent staffing, regular attendance and dependability are essential job expectations for all employees.

### **Unlimited Time Off**

At Independent Identity, we trust our employees to manage their time responsibly and maintain a healthy work-life balance. To support this, we offer an Unlimited Time Off policy that allows Directors to take paid time away from work as needed. This flexible approach is designed to promote rest, personal well-being, and productivity, while ensuring that business needs continue to be met. Employees must plan time off in coordination with their managers and use this benefit thoughtfully and responsibly.

#### **Who can take this leave?**

Directors employees are eligible for this leave.

#### **How much leave do employees get?**

Employees can take this leave as needed, but this policy does not provide an endless amount of time that they can take away from work. Employees are still accountable for meeting work expectations. Unlimited time off is characteristic of a high performing culture that trusts and empowers its employees to communicate and manage their time away from work consistent with the duties of their position and the needs of the business.

#### **What can this leave be used for?**

Subject to prior approval, employees can use this leave for any reason, including for vacation, personal time, or personal emergencies. If an employee is on an otherwise paid or unpaid time off or absence, this policy doesn't apply to that absence and the employee won't receive the regular pay under this policy. Examples of leaves of that fall outside the scope of this policy may include military leave, short or long-term disability leave, workers' compensation leave, any leave during which an employee receives any city, state, or federally provided financial benefit, leave as an accommodation under the ADA or similar state law, domestic violence leave, crime victim leave, emergency responder leave, bereavement leave, blood donation leave, and bone marrow donation leave. If an absence may qualify for any of these types of leave, the employee should contact Lisa Lopez.

If any employee takes excessive unplanned absences, or there is an abusive pattern to absences (like leaving early every Friday afternoon without warning), supervisors will review this with the employee. Excessive absences without proper notice that disrupt the productivity of a team

may result in disciplinary action, possibly including termination of employment. Employees who submit a resignation can't take unlimited time off during the notice period.

Although leave under this policy is subject to approval by the employee's manager or supervisor, the Organization won't deny leave for any reason that an employee is entitled to under any law.

#### How do employees request time off?

Employees should submit requests for time off under this policy to their manager or supervisor and coordinate with them to make sure there is coverage for their work while away. With unlimited time off, both the employee and the employee's supervisor have accountability. Employees are accountable for ensuring their work is complete and they have coverage for their work while away. The employee's supervisor has accountability to ensure the employee has a manageable workload and that the employee has sufficient and full opportunity to take appropriate time off throughout the year.

The supervisors will approve employees' time out of office, but neither employees nor their supervisors will need to track time away under this policy unless the leave being taken is required by law, in which case time should be tracked to ensure employees are receiving all their guaranteed time. During high volume times or when there are shortages on an employee's team, the supervisor may ask employees to refrain from taking leave under this policy or ask employees to schedule a different time. If an employee is having performance problems, leave under this policy may not be available except as needed to comply with required leave under any law.

### **Family and Medical Leave**

#### **Federal Family and Medical Leave Act (FMLA)**

*This policy applies only when Independent Identity has 50 or more employees during each of any 20 or more calendar weeks in the current or preceding calendar year.*

Independent Identity provides family and medical leave that complies with the Family and Medical Leave Act (FMLA).

#### Who can take this leave?

Employees can take this leave if they have (1) worked for at least 12 months, (2) worked at least 1,250 hours in the prior 12 months, and (3) work at a workplace with 50 or more employees within 75 miles. For remote employees, the worksite is the office to which the employee reports. Please contact Lisa Lopez at [admin@independentidentity.org](mailto:admin@independentidentity.org) with questions regarding eligibility.

#### How much leave do employees get?

Employees receive 12 weeks of unpaid leave per year. This amount increases to 26 weeks for employees taking this leave to care for a military family member (see "What can the leave be used for?" below).

#### What can the leave be used for?

Employees can use this leave for the following reasons:

- To care for the employee's child within the first year after birth or placement for adoption or foster care (if the leave is for a child of spouses that both work for Independent Identity and are eligible for FMLA leave, the spouses can take a combined total of 12 weeks of FMLA leave);
- To care for a family member with a serious health condition;
- For an employee's own serious health condition which makes the employee unable to perform any of the essential functions of the employee's position, including reasons related to pregnancy or childbirth;
- For employees with a spouse, child, or parent in the military, to attend to a "qualifying exigency;" or
- To care for a spouse, child, parent, or next-of-kin who is a covered service member of the armed forces and suffered a serious injury or illness that was incurred or aggravated in the line of duty ("military caregiver leave").

Employees may take up to 26 weeks of unpaid time off in a single 12-month period for military caregiver leave, beginning on the first day of leave. Up to 12 of those weeks may be for a reason other than military caregiver leave.

#### What are important definitions?

Family member means a parent, spouse, or child.

Parent means the biological parent of an employee or an individual who had parental responsibility for an employee when the employee was a child.

Child means a biological, adopted, or foster child, a stepchild, a legal ward, or a child for whom the employee has parental responsibility and who is either under 18 years of age or older than 18 and incapable of self-care because of a mental or physical disability.

Qualifying exigencies include:

- Advance notice of military deployment of 7 days or less (for which employees can take up to 7 days of FMLA leave);

- Short-term rest and recuperation leave (for which employees can take up to 15 days of FMLA leave);
- Making childcare arrangements for the military member's child;
- Attending certain military ceremonies and briefings; and
- Making financial or legal arrangements to address a military member's absence.

How does this relate to other types of leave?

Any leave taken under this policy may run concurrently with leave taken under applicable state law where the statutes allow for leave for the same reasons.

Leave under this policy used for military caregiver leave will run concurrently with any other military leave the employee is eligible for.

Employees may substitute any unused paid time off for while taking FMLA leave if the reason for FMLA leave also qualifies for paid time off. However, during any part of FMLA leave when an employee is receiving disability, workers' compensation, or paid family leave benefits, available paid time off can only be used to supplement those benefits if the employee and Independent Identity mutually agree, and state law permits that. The substitution of paid leave for unpaid FMLA leave does not extend the length of the FMLA leave period.

What is the smallest amount of leave employees can use?

Employees must generally take FMLA leave in full-day increments, but they can take leave on a reduced schedule or intermittently in some circumstances, including when the leave is related to:

- A medical necessity due to a chronic serious health condition;
- A medical necessity due to an expected medical treatment of a serious health condition;
- A medical necessity related to a covered service member's serious injury or illness;
- A qualifying exigency related to covered military service; or
- The birth, adoption, or foster placement of a child (if approved by the Organization).

For incremental leave or reduced schedules, employees must take leave in at least one-hour increments.

When do employees need to provide notice?

Employees must provide at least 30 days' notice of their need to take leave if the need is foreseeable. Otherwise, they must provide as much notice as practicable. Employees must try to schedule planned medical treatments to not disrupt Organization operations. If the leave is for a qualifying military exigency, employees must provide notice as soon as practicable, whether the need for leave is foreseeable or not.

Failure to comply with these rules may result in deferral of leave until the employee complies with this policy. If an unforeseen need for leave arises, employees must follow the Organization's standard absence notice procedures, unless unusual circumstances prevent the employee from doing so.

*Do employees need to provide documentation of their need for this leave?*

Independent Identity may request that employees provide certification of leave within 15 days of their request for leave unless that's impracticable in the circumstances. If the Organization determines a medical certification is incomplete or insufficient, the Organization will provide the employee with written notice of the deficiencies, and the employee will have 7 days to provide complete information. If the employee does not provide the requested information within that time frame, the Organization may deny the leave request.

If the leave is needed to care for a sick child, spouse, or parent, employees must provide a certification from a health care provider that states: (1) the date the serious health condition started; (2) an estimate of how long the condition will last; (3) the estimated amount of time the health care provider will provide care; and (4) a confirmation that the family member needs the employee's help.

If the leave is needed for an employee's own serious health condition, they must provide certification from a health care provider that states: (1) the date the serious health condition started; (2) an estimate of how long the condition will last; and (3) that the employee is unable to perform their essential job functions because of the serious health condition. If Independent Identity has reason to doubt the truth of the certification, it may require, at its expense, a second opinion from a health care provider designated by the Organization. If the second opinion differs from the first opinion, Independent Identity may require, at its expense, that the employee get the opinion of a third health care provider designated or approved by Independent Identity and the employee. The opinion of the third health care provider will be final and binding.

Independent Identity may also request medical certification for other leave-qualifying reasons if not prohibited by applicable law. Independent Identity requires certification from an employee's health care provider that the employee is fit to return to work. Failure to provide this certification will result in the denial of reinstatement until the certificate is obtained. If employees don't provide the certification within 3 business days after the employee's scheduled return date, they will be considered to have voluntarily resigned. Independent Identity may ask for recertification from the employee's health provider. For example, if an

employee's medical condition lasts longer than 1 year, Independent Identity may request a new certification from the employee's health care provider every 12 months. If an employee is absent from work due to an ongoing medical condition covered under this policy, Independent Identity may ask for a new certification from the employee's health care provider every 6 months.

#### How is leave calculated?

The U.S. Department of Labor provides the following information about calculating FMLA leave. Only the amount of leave taken may be counted against an employee's FMLA leave. Where an employee takes FMLA leave for less than a full workweek, the amount of FMLA leave used is determined as a proportion of the employee's actual workweek. The amount of FMLA leave taken is divided by the number of hours the employee would have worked if the employee had not taken leave of any kind (including FMLA leave) to determine the proportion of the FMLA workweek used. For example, an employee who normally works 30 hours a week but works only 20 hours in a week because of FMLA leave would use one-third of a week of FMLA leave. The Organization may convert the FMLA leave usage into hours so long as it fairly reflects the employee's actual workweek.

Time that an employee isn't scheduled to report for work may not be counted as FMLA leave. If the Organization temporarily stops business activity and employees aren't expected to report for work for 1 or more weeks (for example, a school that closes 2 weeks for the winter holiday, or a plant that closes for a week for repairs), the days the business activities have stopped don't count against the employee's FMLA leave.

When a holiday falls during a week in which an employee is taking the full week of FMLA leave, the entire week is counted as FMLA leave. However, when a holiday falls during a week when an employee is taking less than the full week of FMLA leave, the holiday isn't counted as FMLA leave, unless the employee was scheduled and expected to work on the holiday and used FMLA leave for that day.

When an employee's schedule varies so much that the Organization is unable to determine how many hours the employee would have worked during the week the employee takes FMLA leave, the Organization may use a weekly average to calculate the employee's FMLA leave entitlement. The weekly average is determined by the hours scheduled over the 12 months prior to the beginning of the leave and includes any hours for which the employee took any type of leave.

Required overtime hours that aren't worked by the employee because of an FMLA-qualifying reason may be counted as FMLA leave. However, voluntary overtime hours not worked due to an FMLA-qualifying reason may not be counted as FMLA leave.

#### Do employees need to check in while on FMLA leave?

If an employee takes FMLA leave because of their serious health condition or to care for a family member, they must contact Independent Identity periodically regarding the status of the condition and their intention to return to work. Employees must also give notice as soon as they can (within 2 business days if feasible) if the dates of leave change, are extended, or initially were unknown.

*What other information do employees need to know?*

Independent Identity will never retaliate against employees for requesting or taking FMLA leave. Employees have the right to return to the same position they had before they took leave or an equivalent position with the same pay, benefits, working conditions, privilege, status, duties, and responsibilities, subject to any exceptions under the law. Employees will be able to continue participating in any health benefit plan while on leave but must continue to pay their portion of the insurance premium. In some instances, Independent Identity may recover premiums paid to maintain health coverage for employees who fail to return to work following FMLA leave. Employees won't accrue any paid leave while taking FMLA leave.

**Jury Duty Leave**

Independent Identity encourages all employees to report for jury duty and provides employees with unpaid time off for jury duty service.

*Who can take this leave?*

Employees that receive a summons for jury service can take this leave.

*How much leave do employees get?*

Employees get as much leave as necessary to respond to a jury duty summons, participate in jury selection, or serve on a jury.

*Is this leave paid?*

This leave is unpaid.

Exempt salaried employees won't have their pay reduced for any week in which they work and also take time off for jury duty, except to offset amounts employees receive as jury duty fees.

*What notice do employees need to provide?*

After receiving a summons for jury duty, employees must notify Independent Identity as soon as reasonably possible. Employees should contact Lisa Lopez at [admin@independentidentity.org](mailto:admin@independentidentity.org) when they receive notice to serve on a jury or attend jury selection to determine whether they will be entitled to paid time off. Independent Identity may request reasonable documentation of jury duty service to the extent permitted by law.

### Do employees have to return to work after jury duty?

If work time remains after Texas employees finish any day of jury service, they must return to work (or log back on to work, if working remotely) for the remainder of their work schedule.

Other employees should speak to their supervisor to determine whether they will have to return to work if time remains in their originally scheduled shift after finishing jury duty. Employees should speak to their supervisor to determine whether they will have to return to work if time remains in their originally scheduled shift after finishing jury duty.

### What other information should employees know?

Independent Identity won't require or request that employees use any other type of leave for time spent responding to a jury duty summons, participating in jury selection, or serving on a jury.

Independent Identity won't discharge, discipline, retaliate against, coerce, or otherwise penalize employees who are absent to attend judicial proceedings in response to a summons for jury duty.

### **Military Leave**

Independent Identity provides military leave pursuant to the Uniformed Services Employment and Reemployment Rights Act of 1994 (USERRA), the Family and Medical Leave Act (FMLA) (to the extent Independent Identity is required to provide leave under the FMLA), and any applicable state laws.

### Who is eligible for Federal military leave?

Under USERRA, full-time, part-time, and probationary employees absent from work because of their service in federal Uniformed Services are covered by USERRA's military leave and reemployment provisions. USERRA does not cover employees whose employment before military service was for a brief, non-recurrent period, or when there was no reasonable expectation that the employment would have continued for a significant period. Uniformed Services means:

- the Armed Forces;
- the Army National Guard and the Air National Guard when engaged in active duty for training, inactive duty training, or full-time National Guard duty;
- the commissioned corps of the Public Health Service;

- members of the National Urban Search and Rescue Response System during a period of appointment into Federal service under section 327 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act; and
- any other category of person designated by the President in time of war or national emergency.

#### Who is eligible for State military leave?

All permanent employees who are members of state uniformed services, including, but not limited to, the National Guard, any State Militia, or any State Defense Force are eligible for leave under this policy. Specific rules and exceptions are as follows:

#### Who is eligible for military family leave?

The federal Family and Medical Leave Act (FMLA) requires covered employers to provide eligible employees with unpaid, job-protected leave for family or medical reasons, including to care for a family member (parent, child, spouse, or next of kin) who is a qualifying covered service member with a serious injury or illness, or for a qualifying exigency due to the employee's spouse, child, or parent being on or called to covered active duty. The FMLA defines "serious injury or illness" as one that was incurred while on active duty or an injury that was aggravated by service while on active duty and that may render the service member medically unfit to perform the duties of the service member's office, grade, rank, or rating.

Permanent employees whose family members are members of state uniformed services, including, but not limited to, the National Guard, Space Force, any State Militia, or any State Defense Force are eligible for leave under this policy.

#### Is this leave paid?

All military and military family leave is unpaid. If Independent Identity provides other paid leave benefits that are comparable to the unpaid military leave benefits under this policy, the employee may be entitled to similar paid leave benefits for military leave.

#### How much military leave may eligible employees take?

Employees eligible for leave under USERRA may take up to 5 cumulative years of job-protected leave to serve in the Uniformed Services.

Eligible employees who are members of state uniformed services may take job-protected leave if they are on active duty. This leave may not exceed 5 cumulative years for employees in Texas. The amount of leave is uncapped for all other employees.

Employees may take military leave for training and other non-active-duty activities in accordance with applicable law.

### How much military family leave may eligible employees take?

Employees whose family members are service members may be eligible to take leave under the FMLA.

Eligible Illinois employees may take up to 15 days of unpaid military leave. Before taking this leave, employees must first exhaust any available paid vacation or personal days, but not sick days.

### What procedure is there for taking military leave or military family leave?

When the need for military leave is foreseeable, employees should notify their supervisor as far in advance as possible. If employees have written authorization from their military branch for the leave, they should provide it when they request leave. An employee is generally only entitled to rights and benefits under USERRA if Independent Identity receives advance notice of the employee's intent to take military leave unless giving advance notice is impossible or unreasonable.

### How does taking military leave or military family leave affect benefits?

Employees on military leave whose service period is 30 days or less may continue their health insurance benefits and will only be required to pay their normal share of the premium. If employees must serve for longer than 30 days, they may elect to continue their health insurance benefits for a period of 24 months after the absence begins or the length of the time of the service, whichever is shorter. In the event of such longer service, employees will be required to pay the entire employer (and employee) premium. Employees won't be deprived of any accrued leave due to taking leave under this policy. Employees may choose to use any available paid leave concurrently with military leave.

### What happens when leave ends?

Upon completion of duties, unless the Organization's circumstances have changed to make it unreasonable, a returning employee who has been honorably discharged from service will be reinstated into their former position or another position of equal seniority, status, pay, and benefits. Employees who are no longer qualified for their jobs will be placed in another position with appropriate seniority, status, pay, and benefits. Employees may be reinstated to the seniority, status, pay, and benefits that they would have had if they had not taken leave under this policy. Employees should report back to work within a reasonable amount of time after returning from their duties or recovering from injuries sustained in the line of duty.

## **Political Activity Leave**

### **Texas Political Activity Leave**

Texas employees who are delegates in or who are eligible to attend precinct conventions may take unpaid time off to participate in conventions. Employees must provide Independent Identity with reasonable notice of the need to take time off under this policy.

Employees who take leave under this policy won't be penalized or suffer a reduction in wages except for the actual time they are absent from work to attend precinct conventions.

### **Voting Leave**

Employees who are eligible to vote in any municipal, county, state, or federal political party primary or general election, any special election, or in any state election where propositions are submitted to a popular vote, may take time off to vote on election day. Employees in Texas may also take time off to vote on any of the days designated for early voting.

#### **Who can take this leave?**

Texas employees who are eligible to vote may take this leave if they don't have at least 2 consecutive hours off work while polls are open.

#### **How much leave can employees take?**

Employees in Texas may take as much time off as they need to vote.

#### **Is this leave paid or unpaid?**

This leave is paid.

#### **What notice do employees need to provide?**

Employees must provide Independent Identity with reasonable advance notice of their need to take time off under this policy.

#### **What other information do employees need to know?**

Employees should take time off at the beginning or end of their regular working shift, unless Independent Identity specifies a different time. Time off under this policy should be combined with the voting time available outside of working hours, unless Independent Identity approves otherwise.

Independent Identity won't require employees to use any other available paid time off while taking leave under this policy.

### **Witness Duty Leave**

Employees who are witnesses or prospective witnesses in legal proceedings can take time off to testify in or provide information related to the proceeding.

### Who can take this leave?

Employees in all states can take this leave if they are witnesses or prospective witnesses in a criminal case. Employees in certain states can also take this leave if they are witnesses or prospective witnesses in other types of legal proceedings, as outlined below.

Texas employees can take this leave if they are witnesses or prospective witnesses in proceedings before any government entity, including courts, administrative agencies, and legislative bodies.

### What can this leave be used for?

All employees can take this leave to testify or provide information in response to a subpoena, court order, or summons related to the legal proceeding. Employees in certain states can also take this leave for other purposes, as outlined below.

### How much leave do employees get?

Employees can take as much time off as they need for the reasons this policy allows.

### Is this leave paid?

This leave is unpaid.

Exempt salaried employees won't have their pay reduced for any week in which they work and also take time off to serve as a witness, except to offset amounts employees receive as a witness fee.

### What notice do employees need to provide?

Employees must provide Independent Identity reasonable advance notice of the need to take time off under this policy.

### How does this relate to other types of leave?

This policy covers situations where employees need to take time off to participate in legal proceedings as a witness. Employees may be able to use other types of leave if they need to take time off to participate in legal proceedings because they or a family member is the victim of domestic violence or other crimes. See the Crime Victim Leave and Domestic Violence Leave policies for more information.

### What other information do employees need to know?

Independent Identity may require employees to provide documentation showing they are eligible for this leave. Independent Identity will treat all information related to an employee's leave under this policy as confidential, except as required by law.

Independent Identity won't discriminate or retaliate against any employee for requesting or taking leave under this policy.

Employees may use any available paid time off during otherwise unpaid time off taken under this policy.

## **Benefits**

### **Employee Benefits**

Independent Identity provides eligible employees with the ability to participate in the following employee benefits: health, dental, vision, supplementary and retirement. Please check the Summary Plan Description(s), which can be obtained from Lisa Lopez at [admin@independentidentity.org](mailto:admin@independentidentity.org), for more information. If there is any conflict between this Handbook and plan documents, the plan documents will govern. Independent Identity may cancel or change the benefits at any time.

### **Workers' Compensation**

As required by state law, Independent Identity provides insurance coverage for employees in case of work-related injury. To ensure that employees receive the workers' compensation benefits they are entitled to, employees must: (1) immediately report any work-related injury to their supervisor, including those that occur while working from home; (2) seek medical treatment and follow-up care if required; and (3) complete any required claim forms and return them to Lisa Lopez at [admin@independentidentity.org](mailto:admin@independentidentity.org). Employees must also provide Independent Identity with a certification from their health care provider regarding their need for leave and their ability to return to work from such leave.

Upon medical certification that the employee is able to return to work, the employee will be offered the same position they held at the time their leave started unless they aren't capable of performing the job responsibilities upon their return or the Organization had to fill the job to maintain effective operations. If an employee's former position isn't available, a substantially similar position will be offered unless there is no such position available, filling the available position would substantially undermine the Organization's ability to operate effectively, or the employee isn't capable of performing the job responsibilities. Upon return from workers' compensation disability leave, if an employee is unable to perform the essential functions of the job because of a physical or mental condition, Independent Identity may provide a reasonable accommodation, as required by applicable law.

## **Performance, Discipline, and Separation**

### **Exit Interviews**

Exit interviews help Independent Identity gather useful information from departing employees, including reasons for employee departure, positives and negatives about Independent Identity, obstacles to employees' efficiency and success, and how Independent Identity can improve. Candid employee feedback is valuable and encouraged.

Employees who have provided a notice of resignation may be asked to participate in an exit interview. Independent Identity will neither require employees to participate in an exit interview nor retaliate against those who decline.

Exit interviews may be conducted in person, by phone or video, or through a written questionnaire. Information disclosed in exit interviews will be kept confidential. Insights and recommendations gathered from exit interviews will be used and presented in aggregate or anonymous formats. However, if employees inform Independent Identity of serious or illegal conduct (for example, harassment, discrimination, embezzlement), Independent Identity will act immediately and may disclose exit interview information according to Independent Identity policy or law.

### **Performance Review**

Independent Identity is committed to providing employees with regular performance feedback that promotes professional growth, accountability, and high-quality services. Performance reviews are intended to recognize employee strengths, identify opportunities for development, establish performance goals, and support ongoing communication between employees and supervisors.

#### **How often does Independent Identity conduct performance reviews?**

Independent Identity conducts formal performance evaluations on a quarterly basis for all employees.

#### **How are performance reviews conducted?**

Supervisors are responsible for evaluating employee performance using the organization's approved evaluation process and discussing the results with each employee in a timely manner.

Performance evaluations may consider factors including, but not limited to:

- Quality of work and clinical performance
- Reliability, attendance, and punctuality
- Professionalism and adherence to organizational values
- Communication and teamwork
- Compliance with policies, procedures, and documentation requirements

- Initiative, problem-solving, and professional development

Employees are encouraged to actively participate in the evaluation process by discussing accomplishments, career goals, training needs, and opportunities for continued growth.

*Are performance reviews the only feedback employees should expect on their work?*

In addition to formal performance reviews, Independent Identity encourages supervisors and employees to communicate regularly regarding job performance, coaching, and expectations throughout the year.

*How can employees learn about relevant training opportunities?*

Independent Identity will determine and communicate what training and development opportunities are available to employees. Supervisors should discuss training opportunities with employees and help employees to use training to expand their skill sets. Employees should notify their supervisors if they become aware of training opportunities that could be valuable for their professional development.

*When it comes to performance reviews, what are a supervisor's responsibilities?*

Supervisors are responsible for fostering employee success through ongoing coaching, clear communication, and timely performance feedback. Supervisors are expected to:

- Establish and communicate clear performance expectations.
- Provide regular coaching and constructive feedback throughout the year.
- Conduct objective and timely performance evaluations.
- Discuss employee strengths, areas for improvement, and professional development opportunities.
- Maintain appropriate documentation of performance evaluations and significant performance-related events.
- Support employees in identifying relevant training and development opportunities.

Detailed procedures, evaluation tools, performance rating criteria, bonus calculations, and documentation requirements are maintained in the Independent Identity Procedure Manual.

*Should employees expect a financial reward if they receive a positive performance review?*

A positive performance evaluation does not guarantee financial or non-financial rewards, such as an increase in salary, bonus, promotion, or continued employment. Compensation increases

and the terms and conditions of employment, including job assignments, transfers, promotions, and demotions, are determined by and at the discretion of Independent Identity.

### **Performance Bonus Time Incentive Program**

Independent Identity maintains a performance-based bonus time incentive program for eligible non-director employees. The purpose of this program is to recognize exceptional performance, encourage professional excellence, promote employee retention, and support high-quality services for the individuals and families we serve.

Eligible employees may earn up to six (6) additional paid bonus days per calendar year based on quarterly performance evaluations.

Bonus time is awarded according to the employee's overall quarterly performance rating:

| Performance Rating              | Bonus Time Awarded    |
|---------------------------------|-----------------------|
| Exemplary                       | 1.5 bonus days        |
| Proficient                      | 1 bonus day           |
| Competent or Below Expectations | No bonus time awarded |

Bonus time is credited following completion of the quarterly review period and must be scheduled and used in accordance with Independent Identity's Paid Time Off (PTO) policy and scheduling procedures.

Employees who are participating in a Performance Improvement Plan (PIP) or who are otherwise not meeting minimum performance expectations may be ineligible to receive bonus time during the applicable review period.

Independent Identity reserves the right to modify, suspend, or discontinue the Performance Bonus Time Incentive Program at any time based on organizational needs, financial considerations, or changes in business operations.

### **Termination of Employment**

Independent Identity strives to ensure all employment terminations are handled in a professional manner with minimal disruption to daily operations. The Organization will provide departing employees with any information necessary for their transition. Departing employees may be asked to help transition work or knowledge to other employees.

*How can employment relationships end?*

Employment relationships can end due to a voluntary termination, involuntary termination, or death.

Voluntary termination occurs when employees:

1. Resign;
2. Retire;
3. Fail to report to work without notice for 3 consecutive business days; or
4. Fail to return from an approved leave of absence on the specified date.

At-will employees may resign from their employment at any time, for any reason or no reason, with or without notice. Independent Identity requests at least 2 weeks' written notice from employees before their resignation. Employees hired for a specific term must provide the appropriate notice outlined in their employment agreements. Employees can provide written notice to their supervisor. Supervisors should provide a copy of the resignation notice to Lisa Lopez at admin@independentidentity.org.

Involuntary termination occurs when an employee is terminated by the Organization. Independent Identity may terminate an at-will employee's employment with or without cause, for any reason or no reason, with or without notice, at any time. A termination without cause happens when the Organization determines that the employee's services are no longer needed, which could be the result of a layoff or reorganization in the Organization.

A termination for cause typically refers to a termination due to the employee's misconduct or failure to perform job duties. This could be due to the employee's (1) continued failure to adequately perform job duties; (2) failure or refusal to comply with the Organization's policies, standards, and regulations; (3) acts of personal dishonesty, fraud, embezzlement, misrepresentation, or other acts harming the Organization; (4) violation of federal or state law applicable to the Organization's business; (5) felony conviction; or (6) breach of the employment agreement.

Employees are deemed to be terminated as of their date of death.

#### *What happens to employee benefits and wages when employment ends?*

Independent Identity will provide departing employees with information about post-termination employee benefits and any other termination notices or information required by law. If severance pay is offered to the employee, the offer will be communicated in writing. Resigning employees may be asked to participate in an exit interview.

Employees will be paid their final wages on the next regular payday unless otherwise required by law. In cases of an employee's death, the final wage payment will be paid to the deceased

employee's estate or as otherwise required by law. In the case of a deceased employee, the Organization will process all appropriate beneficiary payments for any employee benefits plans.

See the Vacation and Paid Time Off policies for information on whether unused leave will be paid out at the time of separation.

*Where should employees return Organization property at the end of employment?*

Upon termination of employment, employees must return all Organization property immediately in accordance with the Employer Property Policy. Employees must conduct a thorough search of their homes, personal computers, cars, personal phones, cloud accounts, tablets, external drives, personal emails, and any other place where the Organization's property (whether in electronic or hard copy form) may be and return it immediately. To the extent permitted by law, employees will be required to repay the Organization (through payroll deduction, if lawful) for any lost or damaged property.

Employees must preserve the confidentiality of the Organization's confidential information after termination of employment.

*Will employees be given references for future positions?*

Independent Identity will only disclose the dates of employment, and the title of the last position held if the Organization is contacted to provide a reference for the employee, unless otherwise required by law or specifically agreed with the employee.

## **Handbook Acknowledgment and Agreement**

*Please sign the acknowledgment form below and return it to Lisa Lopez. This will let Independent Identity know that you have received the handbook. It is your responsibility to read and understand the contents of this handbook.*

I acknowledge that I have received a copy of the Organization's Employee Handbook and understand that it sets forth the terms and conditions of my employment, as well as the duties, responsibilities, and obligations of my employment with Independent Identity. I understand and agree that it is my responsibility to read and familiarize myself with the provisions of the Employee Handbook and to abide by the rules, policies, and standards set forth in the Employee Handbook. I also acknowledge that, except for the policy of at-will employment, the terms and conditions set forth in this handbook may be modified, changed, or deleted at any time without prior notice to me and other employees. Any agreement or promise of any kind pertaining to my employment must be in writing and signed by an authorized Organization executive. I also acknowledge that my employment with Independent Identity isn't for a specified period and can be terminated at any time for any reason, with or without cause or notice, by me or by Independent Identity. I acknowledge that no statements or representations regarding my employment can alter the foregoing unless done on the terms set forth in this handbook or in any agreement or offer letter between me and Independent Identity.

In addition, I acknowledge that I have received a copy of the Organization's policy prohibiting discrimination, harassment, and retaliation, and understand the Organization's policy that there be no discrimination or harassment against any employee or applicant for employment on the basis of any other characteristics protected under applicable federal, state, or local laws. I understand Independent Identity is committed to a work environment free of harassment and discrimination, and that Independent Identity specifically prohibits retaliation whenever an employee or applicant makes a good-faith complaint that they have been subjected to harassment, discrimination, or retaliation. Accordingly, I specifically agree that to the extent I am the subject of any conduct which I view to constitute harassment, discrimination, or retaliation or which is otherwise in violation of the Organization's policy prohibiting discrimination, harassment, and retaliation, I will immediately report such conduct to Lisa Lopez at [admin@independentidentity.org](mailto:admin@independentidentity.org), my supervisor, or a management-level employee. I understand that Independent Identity isn't liable for workplace harassment, discrimination, or retaliation that it isn't aware of, so all employees are encouraged to report any incidents.

I have carefully and thoroughly read the Organization's Alcohol and Drug Abuse Policy. I agree, without reservation, to abide by the terms of that policy. I further agree to notify Independent Identity of any conviction for any criminal drug statute violation occurring in the workplace no later than 5 days after such conviction. I understand that abiding with the terms of this Alcohol and Drug Abuse Policy and notifying Independent Identity of workplace-related drug

convictions are conditions of my employment. I understand that any violation of the policy will result in disciplinary action, up to, and including, immediate termination of employment.

Signature: \_\_\_\_\_

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

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

## **Complaint Report Form - Discrimination or Harassment**

If you believe that you have been subjected to discrimination or harassment, you are encouraged to complete this form and submit it to Lisa Lopez. You won't be retaliated against for filing a complaint.

If you are more comfortable reporting verbally or in another manner, your employer should complete this form, provide you with a copy and follow its discrimination and harassment prevention policy by investigating the claims as outlined at the end of this form.

### **REPORTER INFORMATION**

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

Title: \_\_\_\_\_

Work Address: \_\_\_\_\_

Work Phone: \_\_\_\_\_

Work Email: \_\_\_\_\_

Communication:      Email      Phone      In person

### **IMMEDIATE SUPERVISOR INFORMATION**

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

Title: \_\_\_\_\_

Work Address: \_\_\_\_\_

Work Phone: \_\_\_\_\_

Work Email: \_\_\_\_\_

**COMPLAINT INFORMATION**

Type of Complaint    Discrimination    Harassment    Both

Is the Behavior Continuing?    Yes    No

Name of Person Involved: \_\_\_\_\_

Title: \_\_\_\_\_

Relationship to you:    Supervisor    Subordinate    Co-Worker    Other

Date(s) incident occurred: \_\_\_\_\_

1. Please describe what happened. Please use additional sheets of paper if necessary and attach any relevant documents or evidence.

|  |
|--|
|  |
|  |
|  |
|  |
|  |

2. Please describe how it is affecting you and your work. Please use additional sheets of paper if necessary.

|  |
|--|
|  |
|  |
|  |
|  |
|  |

3. Please list the name and contact information of any witnesses or individuals who may have information related to your complaint:

|  |
|--|
|  |
|  |
|  |
|  |
|  |

4. *This question is optional but may help the investigation.* Have you previously complained or provided information (verbal or written) about related incidents? If yes, when and to whom did you complain or provide information?

|  |
|--|
|  |
|  |
|  |
|  |
|  |

5. If you have retained legal counsel and would like us to work with them, please provide their contact information.

|  |
|--|
|  |
|  |
|  |
|  |
|  |

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

## **Disability Accommodation Request Form**

Employees seeking accommodations aren't required to use this form. Requests may be submitted verbally. Filling out this form can help Independent Identity better understand your needs and reasonably accommodate them. All information submitted will be kept confidential. This form may also be used to request accommodations related to pregnancy, childbirth, or related medical conditions.

### **Questions to clarify accommodation requests.**

What specific accommodation are you requesting?

|  |
|--|
|  |
|  |

If you aren't sure what accommodation is needed, do you have any suggestions about what options we can explore?

Yes    No

If yes, please explain.

|  |
|--|
|  |
|  |

Is your accommodation request time-sensitive?

Yes    No

If yes, please explain.

|  |
|--|
|  |
|  |

### **Questions to document the reason for accommodation requests.**

What, if any, job function are you having difficulty performing?

|  |
|--|
|  |
|  |

What, if any, employment benefits are you having difficulty accessing?

|  |
|--|
|  |
|  |

What limitation is interfering with your ability to perform your job or access an employment benefit?

|  |
|--|
|  |
|  |

Have you had any accommodations in the past for this same limitation?

Yes    No

If yes, what were they and how effective were they?

|  |
|--|
|  |
|  |

If you are requesting a specific accommodation, how will that accommodation assist you?

|  |
|--|
|  |
|  |

**Other**

Please provide any additional information that might be useful in processing your accommodation request.

|  |
|--|
|  |
|  |

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

Return this form to Lisa Lopez at [admin@independentidentity.org](mailto:admin@independentidentity.org).

### **Religious Accommodation Request Form**

Name of Requester: \_\_\_\_\_

Date of Request: \_\_\_\_\_

Email Address: \_\_\_\_\_

Telephone Number: \_\_\_\_\_

Job Title: \_\_\_\_\_

Work Location: \_\_\_\_\_

Identify the company requirement, policy, or practice that conflicts with your sincerely held belief or observance.

|  |
|--|
|  |
|  |
|  |

Describe the nature of your sincerely held belief or observance that conflicts with the company requirement, policy, or practice identified above.

|  |
|--|
|  |
|  |
|  |

What is the accommodation or modification that you are requesting?

|  |
|--|
|  |
|  |
|  |

List any alternative accommodations that would also resolve the conflict between the company requirement, policy, or practice and your sincerely held belief.

Requester Signature: \_\_\_\_\_

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

### ACCOMMODATION DECISION

Accommodations:

☐ Approved as requested   ☐ Approved but different from the original request   ☐ Denied

Specify the accommodation provided.

|  |
|--|
|  |
|  |
|  |

If the approved accommodation differs from the original request, explain the reason for denying the initial request.

|  |
|--|
|  |
|  |
|  |

If an alternative accommodation was offered, indicate whether the employee:

☐ Accepted   ☐ Rejected

If rejected, state the basis for the employee's rejection.

|  |
|--|
|  |
|  |
|  |

If the accommodation is denied and no alternative accommodation was proposed, explain the reason for denying the request without an alternative accommodation.

|  |
|--|
|  |
|  |
|  |