

Employee-At-Will

Employment at II is on an at-will basis and is for no definite period of time. This means that the employment relationship, regardless of the date or method of payment of wages or salary, may be terminated at any time by either the employee or by II for any reason not expressly prohibited by law or for no reason at all. Other than the President or Executive Director of II, no other person has authority to alter the at-will status of an individual's employment or to enter into any employment contract for a definite period of time with any individual. Any agreement with an individual altering their at-will employment status must be in writing and signed by the President or Executive Director of II. The at-will employment relationship provides maximum flexibility for both the employee and II and encourages people to give their best at all times.

Verification of Employment

Independent Identity conducts background checks on employees, contractors and volunteers, to ensure compliance with state and federal service contract requirements, as well as to protect the public interest.

Independent Identity uses several state and federal online databases to research excluded individuals and entities, prior to their hiring, contracting, or otherwise engaging with II. On a recurring annual basis, thereafter, these checks are conducted. Documentation that these checks were performed is maintained in II offices. II will report any exclusion information it obtains to The Health and Human Services Commission (HHSC).

In accordance with the policy outlined above, an agency representative will perform required research in the following database:

Backgrounds Online- Background and screening checks <https://clients.backgroundsonline.com/>

If a prospective or current employee, contractor or volunteer:

1. is listed on the Employee Misconduct Registry, or
2. is revoked on the Nurse Aid Registry, or
3. is listed on the Medication Aide Registry,
4. is listed on the Excluded Individuals and Entities maintained by the United States Department of Health and Human Services, or
5. is listed on the Excluded Individuals and Entities maintained by HHSC Office of Inspector General, or
6. has a criminal conviction listed as an automatic bar to employment in Health and Safety Code, Chapter 250, Vernon's Texas Civil Statutes,

The employee will be notified immediately and discharged, and is not eligible for re-hire or other engagement with Independent Identity. A contractor will be notified, in writing, that the services of that person or contractor

have been terminated, based upon the information obtained by the research. A volunteer will be notified by the Executive Director of their ineligibility to continue to work with the agency.

All reports are confidential and shall be maintained separately from the personnel or master file. If the employee, contractor or volunteer disputes the information received, it is the responsibility of that person to pursue the appropriate process to correct the information.

If a consent form is required by the authorities, the individual will be advised and is required to provide a completed consent form. If any person declines to complete a required consent form, the individual's services with the agency will be terminated. The agency will take reasonable steps to ensure that accurate information is obtained.

Code of Conduct

All of II's policies, procedures and practices are in service of its mission. In order for II to successfully implement that mission we are committed to providing supportive and respectful work environments that provide our employees continual opportunities to learn and grow. This can only be achieved if everyone aspires to live and work by standards of conduct that support the development of our employees, the success of those we serve, and celebrates the diversity, whether in culture, knowledge, skills and/or abilities, that each individual brings to the organization,

The policies and procedures outlined in this manual detail our commitment to this code in all aspects of our daily operational practices, as well as our commitment to deliver high quality services to our clients with respect and dignity and free of conflict and/or favoritism throughout their treatment.

If you have any questions regarding II's Code of Conduct or believe this code or any of the standards of conduct documented in these policies have been violated, please contact the Executive Director or President. For contact information see II's Whistleblower Policy included in the Working at II section of this manual.

We want to promote a culture of open and honest communication and, as such, retaliation against any employee who reports or participates in any investigation related to a possible violation of our standards of conduct is prohibited. If you wish to anonymously report a concern or complaint you are free to do so but please be aware that if insufficient information is provided we may not be able to properly follow up on that issue. Any concern or complaint raised will be responded to within three (3) business days of receipt with a decision or a proposed process to reach a satisfactory and timely decision.

!! Purpose and Scope

The policy guide is designed to help employees become familiar with II's practices and procedures. The information is presented in a general and informal manner and, as such, is only intended to be a summary of current II policies, practices and benefits. Changes may be made from time to time without notice. All employees should feel free to ask questions or raise issues with the Executive Director, or the Clinical Director concerning II's policies at any time. All employees, clients and staff should feel free to ask questions or raise

issues with the President, the Executive Director, or the BCBA's concerning II's behavioral and educational policies at any time.

The policies and procedures in this manual have been adopted voluntarily by II and are not intended to rise to the level of contractual rights or obligations, nor do they constitute a written or implied contract of employment or admissions.

😊 Working at Independent Identity

Working at Independent Identity

Because no two employment situations are ever exactly alike, II's employment policies must have flexibility. However, final interpretation of, and any exception to, II's policies and practices will only be made by the Executive Director of II or his/her designee. Because our goal is to treat our employees consistently, II may modify the policies summarized herein on those occasions when it determines that particular circumstances warrant individualized consideration.

Employment Verification (form I-9)

The United States Citizenship and Immigration Services (USCIS) requires employees to provide identification and proof of their authorization to work in the United States via the Form I-9. This Policy governs the completion, filing, retention, and disposal of Independent Identity (II) Forms I-9 for all employees who work at any of our programs or facilities.

Throughout the entirety of this Policy, "employees" refers to all full-time, part-time and limited-time employees not independent contractors. Human Resources processes and maintains Forms I-9 for all employees.

Who Must Complete the Form

All II employees who began work after November 6, 1986 and anyone labeled "active" in II's human resources system must complete a Form I-9

Authorized Representative

I-9 forms will be completed by the II administrative assistant or the executive director. If needed, ED must approve, authorize, and train any II representative acting in its behalf for processing Forms I-9. The Department of Homeland Security (DHS) does not require the authorized representative to have specific agreements or other documentation for Form I-9 processing purposes.

When completing the Form I-9, the authorized representative must physically examine each original document presented by the employee to determine if it reasonably appears to be genuine and relates to the employee. Reviewing or examining documents via webcam is not permissible.

Name and Misinformation Changes to a Form I-9

Employees are responsible for informing ED of any changes that may affect the information contained on their Form I-9. ED will update Forms I-9 to maintain accurate information. If an employee informs ED of a change, ED requires that employee present documentation to validate the change.

Retention, Termination, and Disposal

Employees' completed Forms I-9 are retained in the I-9 active folder in the one-drive folder for as long as they work for II. If an employee is terminated, the government requires II to retain the Form I-9 for either three years after the date of hire or one year after the date of termination, whichever is later. II retains the pages of the form on which the employee and employer enter data. Copies of documentation presented by the employee are also retained. Unnecessary documentation is shredded on an annual basis.

Procedures

Section 1, Employee Section: Employees are provided the Form I-9 in the new hire welcome checklist. Employees are to date, sign, and complete Section 1 of the Form I-9 by their first day of employment.

Section 2, Employer section: A member of the leadership is to complete Section 2 of the Form I-9 by the third day of employment. Should the employee not provide the required documentation for sign off by the ED by the third day, he/she will be terminated.

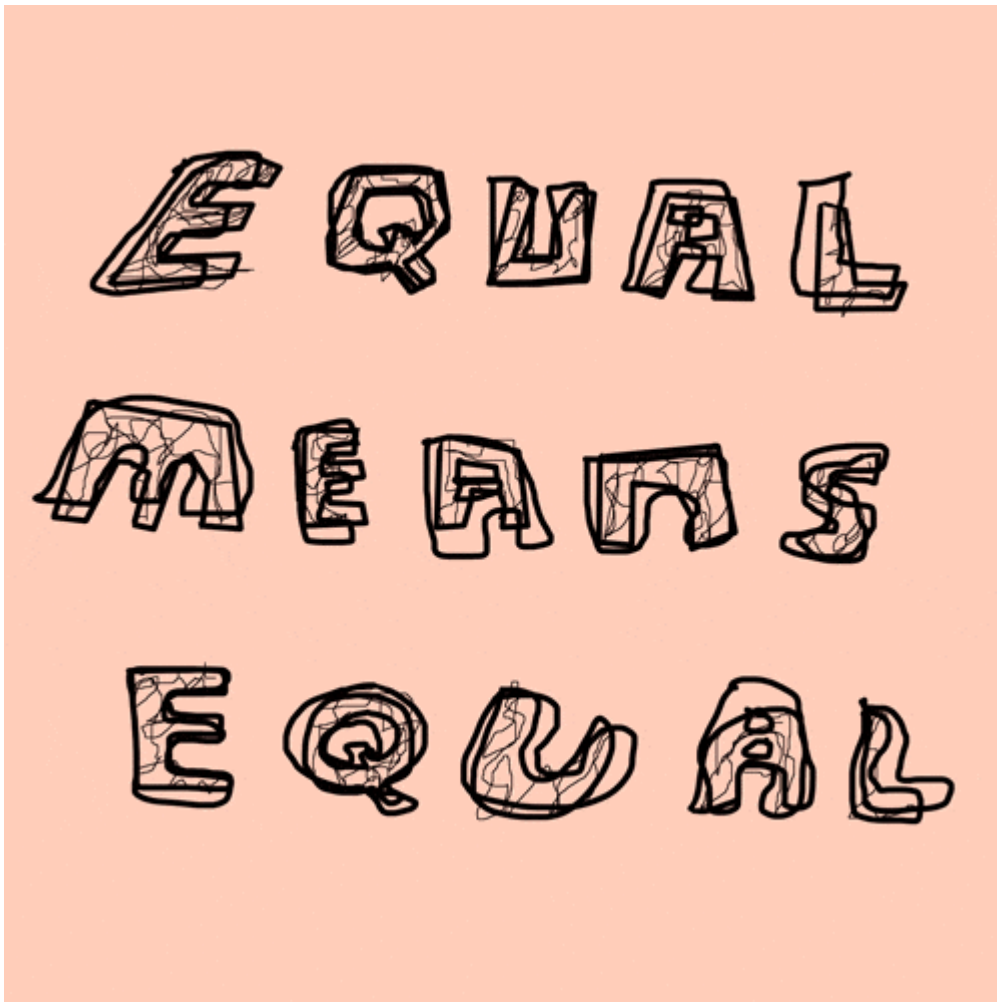
Section 3: This is completed by ED for employees who are (1) rehired or (2) require re-verification of employment authorization or (3) have a legal name change.

This information should be provided to ED only and other departments shall not make or keep photocopies of Forms I-9 or related documents.

Equal Employment Opportunity (EEO)

II is committed to the philosophy and principles of equal employment opportunity. It is the policy of II to recruit, hire, train and promote the most qualified candidates regardless of any race, age, color, religion, national origin, ancestry, sex (including pregnancy and gender identity), sexual orientation, protected genetic information, veteran status, disability, or any other characteristic protected by law. II expects all employees to support its equal opportunity objective.

Any incident or situation involving an allegation of discrimination due to the above-stated reasons should be brought to the immediate attention of either the Executive Director, the President, the Program Director, Human Resources, Clinical Leader and/or Group Leader for investigation and, if appropriate, corrective action.



Affirmative Action

It is II's policy to take affirmative action to recruit, hire, train and promote individuals with diverse racial and ethnic backgrounds, with disabilities and those with specific veteran status. II will use strategies for recruitment and hiring, including searches and networking, to identify a diverse group of qualified candidates:

- Vacant positions generally will be posted, advertised and otherwise announced so as to attract a broadly representative pool of applicants. Possible exceptions to this practice include transfers, promotions or the need to fill a position expediently in order to ensure client safety.
- Only those pre-employment questions will be asked that relate to an applicant's ability to perform the essential functions of the job effectively and safely.
- Selection for vacant positions will be made on the basis of job-related criteria, and the most qualified candidate will be selected. When two (2) or more competing candidates are equally qualified for a position, priority will be given to the individual from a protected group (a) when the position is in a job group or department in which minorities or women are underutilized or (b) when one (1) applicant is an individual with a disability, special disabled veteran, or veteran of the Vietnam era.
- Reasonable accommodations will be made to the known limitations of otherwise qualified applicants or employees with disabilities.

II invites applicants and employees to voluntarily disclose their handicap or disability for the sole purpose of assisting II in its affirmative action efforts. The information will be kept confidential and will be maintained in a file separate from the general personnel records.

Authorized Representative

Purpose:

In accordance with the Americans with Disabilities Act (ADA), II does not discriminate against a qualified individual on the basis of disability or handicap in regard to job application procedures, the hiring, advancement, or discharge of employees, employee compensation, job training, and other terms, conditions, and privileges of employment, unless said involvement creates a threat to the health or safety of clients or employees, or the individual with disabilities is unable to perform essential job functions, such as physical intervention with clients.

II is committed to the fair and equitable treatment of all persons with disabilities and/or handicaps and will assure they are not excluded from programs in the fulfillment of their individualized programs or employment opportunities.

Procedure:

II will reasonably accommodate qualified individuals with a disability so that they can perform the essential functions of a job unless doing so causes a direct threat to the individual themselves or others in the workplace. Employees whom are disabled and seeking a reasonable accommodation concerning job performance must submit their request, in writing, to either II's Executive Director or Clinical Director. A 'reasonable accommodation' is defined as an accommodation that does not create undue hardship to the organization and does not threaten workplace safety.

Reasonable Accommodation – The agency will make a reasonable accommodation to the known physical or mental limitations of a qualified applicant or employee with a disability unless it can show that the accommodation would cause an undue hardship on operations.

Some examples of reasonable accommodation include:

- Making existing facilities used by employees readily accessible to, and usable by, an individual with a disability;
- Job restructuring;
- Modifying work schedules;
- Reassignment to a vacant position;
- Acquiring or modifying equipment or devices;
- Adjusting or modifying examinations, training material, or policies;
- Providing qualified readers or interpreters.

Undue Hardship

In determining whether a proposed accommodation is an undue hardship, Independent Identity will consider:

- the nature and cost of the needed accommodation,
- the overall financial resources of the Company,

- the overall size of the business with respect to the number of employees and the number, type and location of its facilities, and
- the effect on expenses and resources or any other impact of the accommodation on the company's program, enterprise or business

If Independent Identity rejects a proposed accommodation based on undue hardship, the employee may propose an alternative accommodation from the list above.

Temporary Impairments - Generally, temporary non-chronic impairments that do not last a long time (such as broken limbs, sprains, concussions, appendicitis, etc.) do not qualify as a disability.

Confidentiality

The clients and employees of II have the right to privacy. It is the responsibility of every employee of II to adhere to the following policy requirements. This policy also applies to all forms of social media.

- Information regarding a student's treatment, services, history, behavior and family is considered confidential.
- Information regarding a student may not be discussed with anyone other than an employee of II or with authorized personnel of referral or regulatory agencies.
- Confidential information must not be discussed in any location where it is possible to be overheard.
- Information regarding a client will be released only to authorized individuals, with a completed Release of Confidential Information form completed by the client's parents/guardian(s).
- Technical information about II, its employees and its associations cannot be unnecessarily disclosed.
- Information of a private nature concerning any employee of II is not to be discussed on or off the job. This includes all forms of social media.
- Information regarding clients or staff members will not be removed from the program without prior written notice.
- Information regarding clients or staff members will not be maintained outside of the program building, on personal computers or other media devices.
- Information regarding clients or staff will not be maintained, distributed, or shared on any personal or other social media websites/accounts without the express written approval of the parent/guardian or staff member.

Employees who fail to maintain confidentiality are subject to disciplinary action up to and including termination. Also see the Security Policy below for additional confidentiality requirements.

While II's confidentiality policy is provided to II employees annually through this manual, they are also required to review and sign-off on II's confidentiality policy annually and separately.

Discriminatory Harassment Policy

Introduction

It is the goal of Independent Identity to promote a workplace that is free of discriminatory harassment of any type, including sexual harassment. Discriminatory harassment consists of unwelcome conduct, whether verbal or physical, that is based on a characteristic protected by law. Harassment occurring in the workplace or in other employment settings is unlawful and will not be tolerated by this organization. Any retaliation against an individual who has complained about harassment or retaliation against individuals for cooperating with an investigation of a harassment complaint is similarly unlawful and will not be tolerated. Therefore, the initiation of a complaint, in good faith, will not under any circumstances be grounds for disciplinary action. This policy outlines the process and procedures for handling inappropriate conduct and/or complaints of harassment.

Because Independent Identity takes allegations of harassment seriously, we will respond promptly to complaints of harassment. When it is determined that inappropriate conduct has occurred, we will act promptly to eliminate the conduct and impose such disciplinary action as necessary, up to and including termination of employment.

Please note that while this policy outlines our goal of promoting a workplace that is free of harassment, the policy is not designed or intended to limit our authority to discipline or take remedial action for workplace conduct which we deem unacceptable, regardless of whether that conduct satisfies the definition of harassment.

Definitions

The Equal Employment Opportunity Commission provides the following definitions:

Harassment means unwelcome conduct, whether verbal or physical, that is based on a characteristic protected by law. Harassment includes, but is not limited to:

- Displaying or circulation of written materials or pictures that are degrading to a person or group as previously described
- Verbal abuse, slurs, derogatory comments, or insults about, directed at, or made in the presence of an individual or group as previously described
- Sexual harassment means unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when:
- Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment
- Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual
- Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment

Under these definitions, direct or implied requests by a supervisor for sexual favors in exchange for actual or promised job benefits such as favorable reviews, salary increases, promotions, increased benefits, or continued employment constitutes sexual harassment._

Sexual Harassment

The definition of sexual harassment is broad. In addition to the above examples, other unwelcome sexually oriented conduct, whether intended or not, that has the effect of creating a work environment that is hostile, offensive, intimidating or humiliating to either male or female workers may also constitute sexual harassment.

While it is not possible to list all those additional circumstances that may constitute sexual harassment, the following are some examples of conduct, which, if unwelcome, may constitute sexual harassment depending upon the totality of the circumstances including the severity of the conduct and its pervasiveness:

- Unwelcome sexual advances whether they involve physical touching or not;

- Sexual epithets, jokes, written or oral references to sexual conduct, gossip regarding one's sex life; comment on an individual's body, comment about an individual's sexual activity, deficiencies, or prowess;
- Displaying sexually suggestive objects, pictures, cartoons;
- Unwelcome leering, whistling, brushing against the body, sexual gestures, suggestive or insulting comments;
- Inquiries into one's sexual experiences; and,
- Discussion of one's sexual activities.

Other Types of Harassment

Prohibited harassment on the basis of race, color, religion, gender or gender identify, national origin, ancestry, genetic information, physical or mental disability, veteran status, age, or any other basis protected under local, state or federal law, includes behavior similar to sexual harassment, such as:

- Verbal conduct such as threats, epithets, derogatory comments, or slurs;
- Visual conduct such as derogatory posters, photographs, cartoons, drawings, or gestures;
- Physical conduct such as assault, unwanted touching, or blocking normal movement; or
- Retaliation for reporting harassment or threatening to report harassment.

Both sexual harassment and discrimination on the job is unlawful whether it involves coworker harassment, harassment by a manager, or harassment by persons doing business with or for the company, such as clients, customers, or vendors.

All employees should take special note that, as stated above, retaliation against an individual who has complained about sexual harassment, and retaliation against individuals for cooperating with an investigation of a sexual harassment complaint is unlawful and will not be tolerated by this organization.

All Employees Responsible

All employees of the company, both management and non-management, are responsible for assuring that a workplace is free of any form of harassment and discrimination is maintained. Any employee may file a complaint regarding incidents experienced personally or incidents observed in the workplace. The company strives to maintain a lawful, pleasant work environment where all employees are able to effectively perform their work without interference of any type and requests the assistance of all employees in this effort.

Complaint Procedures

If any of our employees believe that he or she has been subjected to discriminatory harassment, the employee has the right to file a complaint with our organization. This may be done verbally or in writing. If you would like to file a complaint you may do so by contacting Jenna Taylor, Executive Director, through email (jenna.taylor@independentidentity.org) or via phone 512-810-9149.

Complaint Investigation

When we receive the complaint, we will promptly investigate the allegation in a fair and expeditious manner to determine whether there has been a violation of our policy. The investigation will be conducted in such a way as to maintain confidentiality to the extent practicable under the circumstances. Our investigation will include private interviews with the person filing the complaint and with witnesses. We will also interview the person alleged to have committed harassment. When we have completed our investigation, we will, to the extent appropriate, inform the person filing the complaint and the person alleged to have committed the conduct of the results of that investigation.

Disciplinary Action

If it is determined that inappropriate conduct has occurred, we will act promptly to eliminate the conduct and will take such action as is appropriate under the circumstances. Such action may range from counseling to disciplinary action, up to and including termination of employment.

State and Federal Remedies

In addition to our complaint process, if you believe you have been subjected to discriminatory harassment of any type, including sexual harassment, you may file a formal complaint with one or both of the government agencies listed below. Using our complaint process does not prohibit you from filing a complaint with these agencies. Each of the agencies requires that claims be filed within 300 days from the date of the alleged incident.

The United States Equal Employment Opportunity Commission ("EEOC")

- 5410 Fredericksburg Rd
San Antonio, TX 78229
800-669-4000

The Texas Workforce Commission Civil Rights Division

- <https://www.twc.texas.gov/jobseekers/how-submit-employment-discrimination-complaint>

Personal Vehicle and Verification of Driving Record

It is expected that employees will be required to use their own personal vehicle to conduct business on behalf of II. This may include the transport of clients and/or other staff whether employees, contractors or volunteers. In this case, in accordance with the provisions of Section 604(b)(2)(A) of the Fair Credit Reporting Act, Public Law 91-508, as amended by the Consumer Credit Reporting Act of 1996 (Title II, Subtitle D, Chapter I, of Public Law 104-208), II will obtain reports verifying the employee's driving record as a condition of employment. In the event an employee's DMV report identifies driving and/or motor vehicle infractions, consideration of employment may be terminated depending on the seriousness of the infractions identified.

II has obtained Hired / Non-Owned Automobile liability coverage with a maximum liability of \$1,000,000 in the event an accident results in litigation. However, it is critical, and required, that employees maintain adequate personal automobile insurance coverage as any property damage to their vehicle and certain personal damage as a result of an accident would be paid for by the employee's personal insurance first. A coverage minimum of \$100,000/\$300,000 with no exclusion for business use is required. Further, the employee must have a valid driver's license. Personal vehicles must be currently inspected and without obvious defect. A copy of the documents providing proof of inspection, registration, valid driver's license and inspection must be submitted to supervisor.

Employees are responsible for their own vehicles and their contents. If a client causes damage to an employee's personal vehicle, it must be reported immediately to the Executive Director or Program Director and an incident/accident form must be completed.

Employees are required to have cell phones turned on for emergency purposes while in the community but are not permitted to use cell phones while operating their vehicle unless pulled over and only in cases of emergency. Use of other handheld devices, including, but not limited to, MP3 players, iPods, PDAs while operating a vehicle is strictly prohibited. Employees are required to have working seat belts and child safety locks in their vehicle.

Pre-Employment Medical Exams

All new employees and techs are required to provide documentation of a physical examination within twelve (12) months prior to his/her start date or must make an appointment to have a physical examination prior to commencement of employment. On their physical form, all newly hired employees are also required to have their healthcare provider indicate their immunization status (indicating if the individual is up-to-date with their immunizations, not immunized or not up-to-date with immunizations). Each employee, tech, contractor, or volunteer must provide documentation of a tuberculin test or x-ray. The results of the examination and test are to be forwarded, in writing, to II. Employment is contingent upon a negative tuberculin test and a health record which supports the prospective employee's ability to perform the essential job duties of the position.

Employee Exclusion Based on Immunization Status

The purpose of this policy is to protect all employees and students from vaccine-preventable diseases. Any employee that is exempt from immunizations, not immunized or not up-to-date on immunizations, should be aware that II must exclude susceptible individuals, who are not immunized when a case of vaccine-preventable disease emerges, for the appropriate time periods, as outlined in Reportable Diseases, Surveillance, Isolation and Quarantine requirements (105 CMR 300.000).

This means that if a student or staff member of II were to be diagnosed with a vaccine-preventable disease, regardless of an employee's level of contact with the diagnosed student/staff member, given they are not up-to-date on their immunizations or not immunized at all, they will be excluded from the work place until the Department of Public Health advises the II's Staff that it is safe for return. An employee that is being excluded from the work place during an outbreak will have the option of utilizing any paid time off available (such as accrued PTO) or take an unpaid leave of absence for the time they are required to be excluded from the workplace. If the employee does not have any options for paid leave available, they will be required to take an unpaid leave of absence for the time that they are required to be excluded from the work place.

Communicable Diseases

It is the policy of II to comply with local, state and federal laws and regulations pertaining to the prevention and/or identification of communicable diseases. Subject to the foregoing, it is the intent of II to ensure that information regarding communicable diseases is available to all employees and clients, that the rights of individuals are protected in as confidential and non-discriminatory fashion as possible, and that appropriate prevention measures are utilized to provide for a safe work environment. Employees who have been diagnosed with a communicable disease will be subject to these personnel policies and procedures in the same manner as employees with any illness. II recognizes that an employee with a communicable disease or life-threatening illness may wish to continue to work. Individuals may be assured of continued employment provided acceptable performance standards are maintained and there is medical certification, if required, that the employee's condition does not present a significant risk to self, clients, or other employees. An employee's health is personal and confidential. Only those for whom it is determined solely by II as essential to know will be informed of an employee's medical condition. It is the employee's responsibility to inform the Clinical Director, in the event he/she has been diagnosed with a communicable disease. The Clinical Director or Health Care Supervisor is responsible to review with the employee all related policies, provide the employee with information relative to reporting cases of communicable diseases, and determine which personnel, if any, for whom it would be essential to be informed of the employee's condition. It is the employee's responsibility to notify the appropriate local authorities and/or the Texas Department of Public Health concerning relevant communicable diseases and to provide documentation of same to II. II reserves the right at its expense to require a medical examination and report in the event there is a dispute or uncertainty concerning a potential risk to self, clients or other employees. I-leak/ware providers are mandated by the Department of Public Health to report certain infectious diseases of II employees and clients. The updated written requirements will be posted in the Executive Director's office. For more information contact the Health Care Supervisor or see the Health and Safety Manual in the Executive Director's office.

Universal Precautions

Preventative measures and good personal hygiene are the basis for protection against contagious conditions and infections. The following guidelines, therefore, have been established in an effort to promote and maintain a high standard of protection against the transmission of communicable disease:

- Disposable non-latex gloves are to be worn when there is a risk that hands will come in contact with blood or body fluids, when working with individuals or handling items or surfaces soiled with blood or those fluids. Gloves are to be changed after each task is performed.
- Disposable non-latex gloves are to be worn at all times when handling soiled laundry or when emptying trash.
- Hand washing is required before and after all procedures, including when staff are rotating between clients; immediate and thorough washing is necessary if hands or other skin surfaces become contaminated with blood or body fluids. Employees must wash hands immediately after removing gloves.
- Open skin lesions on employees and clients must be kept covered to prevent environmental contamination with blood-derived body fluids.

- Surfaces contaminated with blood or blood-derived body fluids must be cleaned first with soap and water and then disinfected with a designated clean-up solution.
- Blood contaminated materials must be disposed of separately in a red plastic biohazard bag with a secure tie or container with a secure top and disposed of properly.
- Sharing of food and other objects (e.g., toothbrushes, razors) is unhygienic, in general, and is prohibited.

Conflict of Interest Policy

The purpose of Independent Identity's (II) Conflict of Interest policy is to ensure the prevention of the personal interest of staff members, board members, and volunteers from interfering with the performance of their duties to II, or result in personal financial, professional, or political gain on the part of such persons at the expense of II or its clients, supporters, and other stakeholders.

Definitions:

- **Conflict of Interest** (also Conflict) means a conflict, or the appearance of a conflict, between the private interests and official responsibilities or a person in a position of trust. Persons in a position of trust include staff members, officers, volunteers and board members of II.
- **Board** means the Board of Directors.
- **Officer** means an officer of the Board of Directors.
- **Volunteer** means a person — other than a board member or client of the immediate family of an individual who is currently a client at II —who does not receive compensation for services and expertise provided to II and retains a significant independent decision-making authority to commit resources of the organization.
- **Staff Member** means a person who receives all or part of her/his income from the payroll of II.
- **Supporter** means individuals, foundations, corporations or any other organizations who contribute to II.
- **Related Party** refers to a spouse, domestic partner, brothers or sisters (whether by blood, marriage or domestic partnership), spouses of brothers or sisters (whether by blood, marriage or domestic partnership), ancestors, children (including legally adopted children, children in the care of a domestic partner, or foster children in the employee's care), grandchildren, great grandchildren, and spouses of children, grandchildren, or great grandchildren. Related Party also refers to any entity the employee or any of the individuals listed as a Related Party above are employed by, own, control or serve as an Officer or a client of the Board of Directors.

Policy & Practices

- Each Board member, Officer, Volunteer, and Staff member, as defined above, will be required to acknowledge receipt of this policy as well as understanding of its content via signature on an annual basis.
- Full disclosure, by notice in writing, shall be made by those specified in *all* above to the Chairman of the Board of Directors or his/her designee for communication to the Board, in all Conflicts of Interest, including but not limited to, the following:
 - A Board member or Officer is a Related Party of another Board member, Officer or Staff member;
 - A Staff member in a supervisory capacity is a Related Party to another Staff member whom he/she supervises;

- II is or has engaged in one of the following types of transactions with an individual or organization that is a Related Party to the employee (a "transaction" does not include providing services as a volunteer or making contribution to II.)
- The sale to, receipt of, exchange or other transfer of leased or owned property;
- Receipt of a loan of money;
- The furnishing of goods, services or facilities for compensation;
- The receipt of goods, services or facilities for compensation
- Payment of wages, salary or other compensation to;
- The transfer of income or assets to or from;
- An Employee or a Related Party have received a gift or favor from an individual or entity outside of II that may influence, or could be reasonably interpreted to influence, the employee's performance of duties to II.
- An Employee or a Related Party of the employee's hold a management position in or has a material financial or ownership interest in a Corporation, Foundation or Agency that transacts business with II that has not been addressed by "a" through "c" above.
- Supporters of II will be required to review, acknowledge and sign this policy if/when they enter into an arrangement to transact business with II that is not considered as making an in-kind or monetary donation to II.

Whistleblower Policy

Independent Identity (II) has instituted a Whistleblower Policy as one means of ensuring the efficient, legal and ethical operation of the organization. The reputation of II is our most precious asset. II's Board of Directors is most interested in hearing purpose of this document is to institutionalize a policy and procedure for (a) the receipt, retention, and treatment of complaints received by II regarding policy, practice, legal, or accounting matters; and (b) the confidential, anonymous submission by employees of II, of concerns regarding questionable policy, practice, legal, and accounting matters.

In order to facilitate the reporting of concerns and complaints, II's Board of Directors has established the following procedure for (1) the receipt, retention and treatment of complaints or matters of concern, and (2) to provide for the confidential, anonymous submission by II employees of these concerns.

Submission of Complaints

Any person, including employees, who believes a violation has occurred, is encouraged to share his/her concerns and questions with their direct supervisor or the Executive Director. If an individual is not comfortable speaking with any of these individuals, or is not satisfied with the response received by this individual, he/she is encouraged to submit their concern or complaint in writing to the Compliance Officer of the Board of Directors. The employee can also follow up on their communication by telephone. The contact information is as follows:

Dr. Ben Seifert, PhD, BCBA-D

Independent Identity

Board of Directors

Compliance Officer

Ben@collaborateaba.com

(Cell) 317-213-0637

The person submitting a complaint should include a telephone number in the submission at which he or she may be contacted if the person requests contact or if the Board determines that contact is appropriate. Any employee of II may submit a matter of concern or complaint without fear of dismissal or retaliation of any kind. II will not discharge, demote, suspend, threaten, harass or in any manner discriminate against any employee in the terms and conditions of employment based upon any lawful actions of an employee with respect to good faith reporting of concerns or complaints.

Employees may also forward concerns or complaints on a confidential or anonymous basis to the Board client named above. If the employee would like his/her name held in confidence, II will do so if it is legal to do so. The employee must realize that if an anonymous concern or complaint is filed and insufficient information is provided it may not be possible to properly follow-up on an issue. For this reason, employees are encouraged to come forward without fear of retaliation.

Scope of Matters Covered by These Procedures:

These procedures relate to concerns or complaints relating to any questionable policy, practice, legal and accounting matters including, without limitation, the following are clear examples but if there are any questions please inform one of the above individuals:

- Unlawful activity
- Activities that are not in line with II's policies and code of conduct
- Activities that are not in line with II's business practices
- Fraud or deliberate error in the preparation, evaluation, review or audit of any financial statement of II
- Fraud or deliberate error in the recording and maintaining of financial records of II
- Deficiencies in or noncompliance with II's technical accounting controls
- Misrepresentation or false statement to or by a senior officer or accountant regarding a matter contained in the financial records, financial reports or audit reports of II
- Deviation from full and fair reporting of II's legal and financial position

Introductory Period

All employees hired by II must successfully complete an Introductory Period of three (3) months in order to continue employment in a specific position. The Introductory Period may be extended to six (6) months if recommended by the new employee's mentor, Clinical Director or Team/Clinical Leader. The introductory period includes New Employee Orientation, during which the new employee will be required to complete ABA based content training, II History and Policies and Procedures, training in the Professional Crisis Management (PCM) and training on their first client/ratio or the basic responsibilities for their position. Successful completion of New Employee Orientation is required to continue with the remainder of the 3 month Introductory Period. A decision will be made at the end of the Introductory Period, at II's discretion, about granting regular employment status, extending the introductory period, or terminating the employment

relationship. However, any action by II on termination is not limited to this period. Termination can occur at any time during the Introductory Period or thereafter without the requirement of an evaluation of the employee. Evaluation reports will become part of the employee's evaluation file and will be reviewed by the individual making the evaluation with the employee. Completion of the Introductory Period does not result in any change in an employee's-at-will status, nor guarantee continued employment for any specific period of time. Transfers to different positions may result in the initiation of an additional Introductory Period.

Staff Training and Development

Independent Identity provides initial training to all new staff. For all direct program staff (Behavior Techs, Apprentice Analysts and Program Assistants) initial training is provided as part of their orientation process during their first two weeks on the job, before they work alone with any client(s) in their Group. Training for all staff is conducted in groups throughout the year. As appropriate certain trainings are provided based on skill level and position. There is also a training day that occurs on a staff development day each year during which a current update of II's program, values, brief history and future plans are provided to staff from all II programs. All direct care temporary employees are also required to take part in the same training as full time direct program staff as part of their orientation during the first two weeks on the job.

Training for direct program staff includes instruction in;

- Characteristics of autism
- Overview of population served
- Principles of Applied Behavior Analysis (ABA)
- ABA methods of instruction
- Best practices in motivating individuals: how to be reinforcing
- Conducting discrete trial teaching
- Conducting task analyzed teaching
- Conducting incidental teaching
- Implementing behavior management procedures
- Recording and analyzing data
- Performing functional assessment of problem behaviors and developing behavior management plans
- Working with families/guardians, other agencies
- Safety and Emergency Procedures (Fire, Disasters, etc)
- Crisis Prevention and Management
- Medication Administration Protocols
- Infection Control Policies and Procedures
- Abuse, Neglect and Exploitation Training
- First Aid
- CPR
- Professional behavior and ethics

A critical component of training is hands on practice of skills with immediate coaching and feedback provided. In addition, training includes assigned reading; didactic instruction; and testing.

In addition to initial training, II schedules additional staff training each month. These trainings are generally held immediately after clients leave for the day.

In addition to covering multiple topics related to specific ABA teaching techniques and II protocols, training and certification in CPR, First Aid, and crisis prevention is also provided during these sessions.

Employees who wish to attend a job-related conference or seminar must submit a request in advance to the Director specifying the dates, times and location, the cost of registration and associated travel and lodging costs, if applicable. The Director will have final approval of the request. The decision will be based on relevancy to organizational goals and the employee's present or future professional duties. Approval may, however, be limited by budgeting or staffing constraints.

Attendance at an approved conference/workshop will be considered as regular work hours. The employee will be compensated for the actual hours involved in attending the conference, excluding travel time, meals and time spent at lodging. Exempt employees will not be compensated for time beyond their regular hours.

All full-time direct care staff are expected to take part in approximately 24 to 50 hours of training per year. Please see the current year's training schedule for dates, times and content.

 Employment Information

Personnel Files

A personnel file is maintained for each employee. These files are II's official records and are intended to contain information pertaining to the employee, including, but not limited to:

- Application for employment and/or resume
- Offer of employment letter
- Verification of prior employment including, but not limited to, reference checks and letters of recommendation
- Completed I-9 form (housed separately)
- Auto insurance information and copy of driver's license
- EEO form
- Copy of professional licenses and/or certifications
- Employee address, telephone number, emergency information, personnel status and any changes to this data
- Dental, health, retirement, disability and life insurance applications sign-up or refusal documentation
- Other payroll related information including, but not limited to, W-4 form, salary adjustments, direct deposit information and deductions information

Employee performance evaluations, letters of recommendation and letters/notes of disciplinary communications/actions are maintained in a separate file accessible by the Executive Director, Clinical Director, and the employee's mentor and supervisor(s).

Employee health records are maintained in a separate file and contain employment related health records including but not limited to physical exam and PPD records, accident reports, workers' compensation reports and pertinent medical history and are accessible by the Executive Director and Clinical Director.

The Executive Director or his/her designee is responsible for maintenance of the contents of the personnel files. In consideration of the confidentiality and privacy of personnel records, access to these files in general, is restricted to the following: the employee, supervisors and managers, individuals who have a legitimate need and right to know, those possessing the legal authority for access, II's legal counsel and those individuals who have been given written approval by the employee.

Employees may review their personnel files by submitting a written request to the Executive Director, Program Director or Human Resources. Arrangements will be made at a mutually convenient time to inspect the copy documents contained in the file. No documents may be removed from an employee's file. However, an employee may submit written responses to information contained within the file that he/she considers objectionable.

Change in Personal Status or Information

To keep employee records current, a change in status, including marital or dependent status, alien status, address, telephone number and tax exemptions must be reported/updated in the employee's Quickbooks Workforce Profile immediately following the change. Criminal arrests and convictions including arrests or convictions for driving under the influence and/or any changes in the status of one's driving license or professional license are also to be reported immediately to the Executive Director or Clinical Director.

Employment Categories

All positions at II are classified as "exempt" or "non-exempt" for purposes of the minimum wage and overtime requirements of state law and the federal Fair Labor Standards Act (FLSA). An exempt employee is one who holds a professional, administrative or executive position as defined in the FLSA and who is paid on a salaried basis. Exempt employees are not subject to minimum wage or overtime pay. Employees who do not fall into one of the exempt categories (for example, some support staff employees) are classified as non-exempt. Non-exempt employees are required to receive overtime pay for any hours worked over 40 hours in one week (see specific Overtime policy for overtime approval requirements) and are subject to minimum wage requirements as well.

- **Regular Full-Time Employees:** employees who are assigned to an established position with a regular work schedule of at least thirty-five (35) hours per week and have successfully completed the introductory period. Regular full-time employees accrue paid time off, paid holidays and are eligible for benefits as outlined in the Benefits sections of this manual. In addition to a background check and fingerprinting, we will require he/she be CPR and First Aid certified and trained in Professional Crisis Management (PCM) (depending on individual's role at II).
- **Regular Part-Time Employees:** employees who are assigned to an established position with a schedule of at least twenty (20) hours, but less than thirty-five (35) hours per week and have successfully completed the introductory period. Regular part-time employees accrue paid time off on a pro-rated basis consistent with their scheduled hours and are eligible for other benefits outlined in the Benefits section of this manual, dependent upon the number of hours worked. In addition to a background check and fingerprinting, we will require he/she be CPR and First Aid certified and trained in Professional Crisis Management (PCM) (depending on individual's role at II).

- **Limited Part-Time Employees (Hourly Employees):** employees who work a set schedule of less than 20 hours per week and have successfully completed the introductory period. Other than the sick time required by law, hourly employees are not eligible for paid time off or leave benefits and are ineligible for the benefits outlined in the Benefits section of this manual. In addition to a Background check and fingerprinting, we will require he/she be CPR and First Aid certified and trained in Professional Crisis Management(PCM) (depending on individual's role at II).
- **Interns*:** work under the supervision of authorized staff through an internship program at a local, high school, college or university. Internships usually last no longer than a school year and may or may not be paid. Techs do not accrue paid time off or leave time, other than the sick time accrual required by law and are ineligible for other benefits outlined in the benefits section of this manual. In the event that an intern is hired in a capacity to work directly with clients, in addition to a Background check and fingerprinting, we will require he/she be CPR and First Aid certified and trained in Professional Crisis Management (PCM) (depending on individual's role at II).
- **Volunteers*:** work under the supervision of authorized staff and are utilized as needed. Volunteers are not paid, do not accrue paid time off or leave time and are ineligible for other benefits outlined in the benefits section of this manual. Volunteers are required to undergo a BACKGROUND check and fingerprinting if they do not work directly with clients. In the event that a volunteer is volunteering in a capacity to work directly with clients, in addition to a Background check and fingerprinting, we will require he/she be CPR and First Aid certified and trained in Professional Crisis Management (PCM) (depending on individual's role at II).

*Interns and Volunteers are required to sign a confidentiality form before working with II.

Job Duties and Work Assignments

In the event that census in a program is down due to declining enrollment, home visits, or client vacations and holidays, and staff absences, II reserves the right to assign specific tasks or to reassign the employee to another component within the program or to another program within II.

Performance Evaluation

The opportunity to have periodically scheduled conversations dedicated to conducting an objective assessment of the strengths and limitations of current performance and the employee's developmental needs is critical to maintaining II's high level of service to its clients. Once the Introductory Period has concluded, formal performance evaluations are conducted periodically or as often as needed. The Performance Review process affords an opportunity for the employee and his/her supervisor to discuss the individual's performance goals; the individual's current performance as it measures against II's standards and his/her individual performance goals; and the steps the employee might take, with appropriate support from the Clinical/Group Leader and/or Supervisor, to continue to grow in his/her position.

Evaluations occur usually once or twice per year, dependent on the type of evaluation. It may be necessary, however, for an evaluation schedule to be altered or delayed. No rights accrue to the employee as a result of an altered or delayed evaluation. The evaluation schedule does not imply a specific period of employment nor is it to be taken as a contract or promise of long-term employment.

The most productive performance reviews are those in which the individual employee takes an active part. II encourages each individual to assess his/her own performance prior to the formal review, and to consider what he/she and/or II may be able to do to help strengthen the employee's performance in the future. The supervisor who has written the performance evaluation will review it with the employee. Performance evaluations will be placed in the employee's evaluation file.

Corrective Action Plans

II's Corrective Action Plan policy is designed to provide a structured corrective action process to improve and prevent a recurrence of undesirable employee behavior and performance issues.

Employees whose work performance is, all or in part, unsatisfactory, whose actions violate policy or procedure or whose conduct compromises the objectives of II may be subject to a Corrective Action Plan. The plan will specify the issue, clarify the expectations of II, identify an action plan to remedy the issue and the process that will occur if the action or unsatisfactory performance continues.

Employees who fail to comply with a Corrective Action Plan may be subject to disciplinary action up to and including termination. If it is determined by II management that the employee's performance, actions and/or conduct seriously compromises the objectives and/or safety of the program, the disciplinary action, up to and including termination, may be implemented without a Corrective Action Plan being put in place.

If an employee would like to discuss their Corrective Action Plan without the supervisor that developed the plan, prior to signing it/agreeing with it they may request to meet with a member of the board of directors, the Executive Director, or Clinical Director.

If an employee does not agree with their Corrective Action Plan, a conversation should be facilitated between the employee and the supervisor that issued the Corrective Action Plan to identify the points with which the employee does not agree. If appropriate, changes/updates can be made to the plan. If there are not appropriate changes/updates to be made, the employee has 2 courses of action:

- The employee can refuse to sign the plan, at which point a 3rd party from the Board of Directors would sign the document as a witness. This signature would indicate that the employee had a chance to review the document and is refusing to sign.
- The employee can write a 'response' to the Corrective Action Plan outlining the parts of the plan with which they are in disagreement and submit their response with the unsigned Corrective Action Plan.

The final Corrective Action Plan becomes a part of the employee's personnel file.

Problem-Solving and Dispute Resolution Procedure

The most important relationships that an employee develops at II include those with his or her managers and team members. Positive relationships increase job satisfaction, enhance productivity and assure that the individual and his or her team meet II's high professional standards. This problem-solving policy is designed to ensure that all employees get the individualized attention that is so essential to a successful working relationship, and to ensure that each employee's point of view is given management's full consideration.

II expects that each employee will speak directly to his/her Supervisor about ideas, recommendations, and concerns about II or the employee's individual performance. However, if, after talking with management, the employee is dissatisfied or would like additional discussion, he or she is encouraged to outline the concerns in writing and set up a time to speak with the Executive Director. The Executive Director will respond to this request within three (3) days.

Harassment or discrimination based on an individual's race, age, color, religion, national origin, ancestry, sex (including pregnancy and gender identity), sexual orientation, protected genetic information, veteran status, disability, or any other characteristic protected by law will not be tolerated at II and should be immediately brought to the attention of management. Please see II's full Discriminatory Harassment policy in this manual for information on how such a complaint will be addressed.

If the situation requires further investigation before a decision can be made or an action taken, the Executive Director, after requesting permission from the employee, will discuss the matter with whomever else is deemed appropriate at II and will report back to the employee, in writing, on any subsequent decisions.

If the situation is one where the Supervisor has been made aware of an act or behavior that is illegal or poses a danger to II's clients or staff, the Executive Director will conduct a confidential investigation and do her or his best to protect the confidence of the individual who reported the incident and/or behavior. However, the safety and well-being of II's clients and staff and business practices will be of the highest priority in such an investigation.

Following any investigation, the Executive Director will issue the decision/determination regarding the matter at hand. As appropriate, materials concerning a complaint will become part of the employee(s) file.

The problem solving and dispute resolution procedure does not grant any specific rights to employees and does not impair in any manner II's rights concerning discipline and termination.

See the Discriminatory Harassment Policy for state and federal remedies.

Promotion and Transfer

II encourages the promotion or lateral transfer of employees who are capable of and interested in assuming varied or greater responsibility. We will notify employees via email of any new positions being offered to provide them with the opportunity to indicate their interest in the new position. Any employee, who feels he/she meets the basic qualifications as posted for an available position, is invited to submit a written request for consideration. The following factors will be assessed when reviewing a candidate's request for consideration:

- Qualifications
- Demonstrated skills, initiative, and maturity
- Prior performance evaluations, and attendance

- Length of service
- Demonstrated ability to accept increased and/or varied levels of responsibility

The employee is encouraged to discuss with his/her mentor or a supervisor the intent to apply for a different position prior to the submission of the written request for consideration.

Private Work with Clients After Work Hours Guidelines

II recognizes that families and guardians may seek to hire II staff clients to provide additional services outside of regular program hours. II neither encourages nor discourages this practice. However, the following policies apply:

- II is not responsible for any compensation, liability or worker's compensation insurance for time contracted by a family/guardian outside of the staff's II commitment.
- No II employee will ever be required by II to provide additional private pay hours for any II client.
- II is not responsible for, does not supervise, or in any way endorse the quality of therapy provided by II employees during hours they are paid privately.
- Staff members who are hired privately may not provide any preferential treatment to the families/guardians or clients that hire them privately during regular program hours.

If it is determined that the II employee's private pay commitments are interfering with his/her employment commitment to II, that employee may be required to terminate his/her private employment with that family(ies)/guardian(s) or resign from his/her position with II.

What II allows and expects from employees when taking a client after work hours:

- Staff are expected to be working on II related business between the hours of 8:00am and 4:30pm Monday through Friday or longer as meetings, training or other II responsibilities require.
- As a convenience, II will allow staff to leave 1 afternoon each week with a client directly after the program day ends (at 3:30pm). Once the employee has assumed responsibility for that client at 3:30pm the assumption is that the employee is at that point being privately paid by the family and that they and the client are no longer the responsibility of II as is stated in the above policies. Employees should notify their supervisor when they will be leaving at 3:30pm.
- II expects that employees will still make their II responsibilities their priority for meetings and trainings that are being scheduled and will either cancel their client responsibilities or defer the time those responsibilities start on days that such meetings and trainings are scheduled. Scheduling for these types of activities generally occur at least a week in advance so there is plenty of time to notify a family/guardian.
- Likewise, it is not appropriate for a client to be present during a meeting or training as he/she is unengaged during a time that the employee is privately responsible for them and, potentially, distracting to others attending the training or meeting.

We realize there may be exceptional situations that require exceptions during some weeks. When this is the case, employees should make the Clinical Director in their area aware of the situation.

Employment of Relatives or Domestic Partners

To avoid potential conflicts of interest, II reserves the right to refuse to hire, promote or transfer an individual to a particular position if the individual would be under the direct or indirect supervision of a family client or domestic partner and where such placement has the potential to create an adverse effect on supervision, safety, confidentiality or morale.

If the family member or domestic partner relationship is established after employment, one of the individuals concerned maybe required to transfer to another position, department or program.

Requesting a Schedule Adjustment

Employees interested in making an adjustment in their schedule (reducing their schedule to less than full time or increasing their schedule from part time) must submit a written request to their supervisor no less than 30 days prior.

- For employees who are on leave, requests can be submitted via email.
- Employees can submit a preference of days, but it is not guaranteed that II will be able to accommodate the preference.
- The more notice given, the better but at least 30 days is required.
- The ability of II to grant an adjusted work schedule will depend on the following:
 - The employee's ability to meet the commitments and responsibilities of their current position.
 - II's current business conditions.
- Failure to submit a formal request within the appropriate timeline (stated above) will result in the rejection of the request.
- If a formal request is rejected and the employee chooses to follow the part time schedule utilizing their PTO (calling-out) the disciplinary procedures regarding misuse and/or abuse to PTO time will be followed

Once and employee's request has been reviewed they will receive a formal communication from the appropriate administrative staff member. This communication will outline the terms of the schedule adjustment request.

General Guidelines for employee responsibility based on position versus required weekly schedule is noted below (due to the nature of some positions at II, a part time schedule is not preferred/cannot be accommodated for the success of the clients or due to business conditions)

Job Title/Responsibility	Recommended Work Days
Behavior Technician	At least 3 days per week
Apprentice Analyst	At least 4 days per week
BCBA	At least 4 days per week

All employees must work a minimum of 3 days per week. An adjustment in an employee's schedule is a permanent and fixed agreement. This means the employee must have a set day(s) that they would be 'off' each week. The day(s) cannot vary/fluctuate. For example, if an employee is scheduled to be out every Wednesday (per their agreed upon adjusted schedule), then they must follow that schedule each week. They cannot be out on Wednesday one week and then out on Thursday the following week.

- If an employee needs to be out of work on a day when they are typically scheduled in (per their agreed upon part time schedule), they will use their accrued PTO time. They must fill out a PTO Request and submit it to the appropriate PTO administrator in their program.
- An employee is not allowed to 'swap' their standard day off to accommodate a schedule change (i.e. an employee is typically scheduled out on Wednesdays but has an appointment on Thursday, they cannot come in on Wednesday in order to be off on Thursday to accommodate their appointment, they will need to use PTO time).
- If an employee's agreed upon day off corresponds with a mandatory all staff training (i.e. a training day) the employee must make accommodations to be in attendance for any and all training they are required to attend/complete.
- If an employee comes to work on their set day off to accommodate a training or other position specific responsibility they are required to check in and out via lineleader and send an email to supervisor noting the additional time.

Working from Home

Eligibility

Staff that are eligible to take a work from home day are; Executive Management, Clinical Directors, the Program Manager and/or the Administrative Assistant. Eligible employees are allowed to take up to 6 work from home days per calendar year, business conditions permitting.

Procedure

The days that an employee wishes to work from home must be approved in advance by the Clinical Director (or their designee) and are subject to the current scheduling demands of the program. If a day is scheduled in advance, and the current demands of the Program on that day require that staff to come into the Program, that staff will be contacted and will be required to return on site. During the work from home day, the staff must be available via phone and email for the duration of the Program hours. If the employee working from home is unable to be accessible during the work day due to other work obligations (ll related meetings, webinar attendance, work related phone calls, etc.), it is that employee's responsibility to notify his/her group and any staff working closely with them so those staff members know when the employee will be accessible. If the employee working from home is unable to be accessible during the work day due to personal obligations (personal or doctor appointments, appointments related to a child or other dependent, etc.), the employee must notify supervisor of their location, in advance, so that the time can be recorded as paid time off (PTO) and included as such on the schedule (if applicable).

Working from home is not to be used as a substitute for child/dependent care obligations, family obligations or other personal responsibilities. While working from home the employee cannot be the primary care taker for child/dependent care.

Days may not carry over from year to year.

Salary

It is the policy of II to compensate employees in a manner that reflects job responsibilities, experience, education and performance. At any time, if an employee would like to review or reference the current II job description and salary information, they should contact a member of the Management Department.

Salary reviews are generally conducted on an annual basis during the employees annual review with adjustments effective the following pay period. Compensation is determined using data gathered to assess salaries offered in the same approximate geographic area for positions that are similar in their scope and nature and take into consideration an individual's job performance, significant accomplishments and professional growth. The salary review schedule does not imply a specific period of employment nor is it to be taken as a contract or promise of long-term employment.

Salary ranges and increases are predicated upon available financial resources and must be approved by the Executive Director, President and Compensation Committee of the Board of Directors.

Overtime

II will pay time and a half to nonexempt employees who exceed 40 hours of work time in a workweek. Paid leave, such as holiday, sick or vacation pay, does not apply toward work time. The majority of II employees are normally scheduled for a 40 hour work week, overtime payments do not commence until the employee exceeds 40 hours worked in a workweek.

Overtime Approval

Employees are required to obtain approval from their supervisor prior to the use of overtime. Employees who anticipate the need for overtime to complete the week's work must notify their supervisors in advance and obtain approval prior to working hours that extend beyond their normal schedule. Approval is required for hours that exceed 40 hours in a work week.

Consequences of Unauthorized Overtime

Employees who fail to obtain approval prior to working hours that extend beyond their normal work week will be subject to disciplinary action up to and including termination.

Payroll

Payday is every other Friday and covers compensation for the 2 weeks (10 days) preceding the Monday the time sheet is submitted.

Staff are expected to scan in using the QR code upon arrival and departure to clock their time. Scanning in should not be completed until you are ready to work. Any restroom breaks, phone calls, or personal tasks should be completed before scanning in. They should also check in/out for lunch.

Each week staff are required to approve their time sheet and submit any changes to the manager.




It will process payroll deductions required by law and as otherwise authorized by the employee.

Most banks provide for direct deposit of a portion or all of an employee's net pay for those individuals who have checking or savings accounts at a branch office. Employees are encouraged to enroll in direct deposit. Arrangements for payroll deductions, other than those required by law, must be made with Bookkeeper.


Timekeeping & Reporting Worked Hours

All employees are required to track and accurately report hours worked and time off/PTO using the company-provided application lineleader. Time sheets should be recorded daily and approved by you every Monday. Final approval should be submitted by Monday preceding the pay day. If a Monday falls on a holiday, time sheets should be submitted by 4:00 P.M. the Friday prior.

Failing to consistently and accurately track and timely report hours worked is considered unacceptable job performance and could result in corrective action.



Starting the Day in the Mobile App
Staff Training Overview
app.trainual.com/208c5440-4f54-4580-a4...



Ending Your Day in Lineleader
Staff Training Overview
app.trainual.com/208c5440-4f54-4580-a4...

Healthcare Insurance

Independent Identity offers health insurance coverage for all Regular Full-Tune Employees. For employees who have completed a 60 day probationary period, II will pay eighty percent (80%) of the cost of an individual plan. Employee's may upgrade the insurance plan from silver to gold at the employee's expense. The remaining twenty percent (20%) of the individual plan is paid by the employee through payroll deductions. Coverage starts on the 59th date of hire. II does not pay for health insurance for any dependents of employees. Independent Identity offers supplemental insurance benefits such as vision and dental as a pre-tax benefit to the employee. II does not pay any premiums for these supplemental benefits. If an individual's employment with II is terminated their II health insurance will continue through the last day of the month in which they terminate. Any employee choosing not to take advantage of health insurance must decline coverage through Quickbooks.

Expense Reimbursement

Employees will be reimbursed for authorized expenses which are incurred while performing assigned job duties. Receipts must be supplied and expense claims must be submitted by the end of the month following the date the expense was incurred or reimbursement will not be made.

All invoices must have the account code written on them and approved by the Clinical Director prior to being submitted to accounting. The bookkeeper reviews all requests for payment.

Every employee reimbursement or purchase request must be documented with travel authorization, receipts, nature of business, program allocation, and funding source (if applicable) before approving for reimbursement.

Other

The cost of staff clothing destroyed by a client behavior will be reimbursed up to \$30.00, per item. Prescription glasses destroyed by a client behavior will be reimbursed up to the value of replacing the same prescription. Car interior will be cleaned professionally if the car has become soiled through the course of client transportation. Cost of the cleaning of the interior must be approved by supervisor prior to cleaning in order to receive reimbursement.

Conferences and/or Webinars

	PTO Not Deducted	Conference Fees Paid	CEU Fees Paid	Hotel-- Up to 2 Nights	Travel Expenses	\$25.00/ Day Food
Executive Management				X		X
Directors/B CBA's						
Apprentice Analysts/B ehavior Techs						
Non-Clinical Staff	Decisions will be made on an individual basis. A recommendation to attend the conference must come from a Director. A Clinical Leader can make a recommendation to Director for a team instructor from their Group to attend a conference by emailing the Director with the details of the conference and the reason the staff should attend the conference. If staff have an interest in attending a conference they should approach their Clinical Director with information on why the conference would be appropriate for them.					

Staff looking to obtaining CEUs through webinars should plan to have the webinar take place outside program hours. Decisions will be made on an individual basis to approve live webinars that happen during program hours.

Receipt of Gifts, Money and/or Gratuity

II is very fortunate to have a generous parent/guardian group who appreciate the care and high quality of services we provide to our clients. As such it is important for us to establish a policy relating to the receipt of gifts, money and/or gratuities by employees from II's parents/guardians or any of II's clients or vendors. The purpose of this policy is to provide employees with guidance as to what is and is not acceptable to ensure we maintain the program's integrity and that all employees are free from even the suspicion of bias in their treatment of any of our clients.

An employee is not allowed to accept any gift with a value in excess of \$10 if it is given to that employee for their own personal use. This is inclusive of items with a monetary value of greater than \$10, cash, check, and/or gift cards. This limit has been set by the Ethics Code for Behavior Analysts. A gift is acceptable if it functions as an infrequent expression of gratitude and does not result in financial benefit to the recipient. Instances of giving or accepting ongoing or cumulative gifts may rise to the level of a violation of this standard if the gifts become a regularly expected source of income or value to the recipient. It is assumed that any homemade baked goods given to an employee fall under the \$10 disclosure limit.

In addition, any employee whose action at or around the time he/she receives a gift, based on specific circumstance other than assignment to a particular client's group, may be viewed by a reasonable person as being influenced by that gift, must disclose the gift to the Clinical Director or Executive Director. If it is the Clinical Director who is the one who receives the gift, it must be disclosed to the Executive Director. The disclosure must come in the form of a written note and must include the following: Date the gift was received, name of the employee who received the gift, name of individual who gave the gift, relationship of that individual to the employee such that it could be viewed as an influencing factor, description of the gift, approximate value of the gift and any other comments believed to be helpful to provide.

The above limitations and disclosures do not apply to any gifts, including money, gift cards, materials, food (breakfast, lunch, snacks) and/or items that are donated by a group of parent/guardians of clients that are donated specifically for use in a classroom or classrooms, a program room or program rooms, for the benefit of all staff in the program, or for general use in conducting the day to day business on behalf of all individuals at the program. Donations of toys or materials to the center are not considered business gifts.

Employee Morale, Health and Welfare Policy

From time to time and as part of its Employee Morale, Health and Welfare Policy, Independent Identity (II) has the established practice of engaging in the following activities on behalf of its employees for the improvement of working conditions, employer-employee relations and retention, employee morale and improvement of the delivery of services. All such activities are subject to the availability of funds and compliance with IRS requirements related to tax-exempt organizations.

- Provision of minor gifts, staff events, food, beverage and other similar employee activities to recognize contributions to II's mission, exceptional performance, employee longevity or other significant events in the lives of II's employees.

Paid Time Off (PTO) Policy

Revised for 2026 FY

Purpose

II recognizes that employees have diverse needs for time off from work and, as such, II has established this paid time off (PTO) policy. Employees are accountable and responsible for managing their own PTO hours to allow for adequate reserves if there is a need to cover vacation, illness or disability, appointments, emergencies, or other situations that require time off from work (such as holidays not recognized as part of the company holiday schedule, see the separate holiday schedule included in the Benefits Section of the manual).

Eligibility

II grants Paid-Time-Off (PTO) to Regular Full-Time and Regular Part-Time employees. During the employee's first 90 calendar days of employment they do not have access to PTO time.

Following the employee's introductory period, they will receive a bank of 5 sick days, 5 vacation days, and 3 mental health days (vacation and mental health days must be scheduled 2 weeks in advance). Part-time banks will be prorated, part-time employees are at a pro-rated rate from Full time employees. New employees who start mid year will be prorated by quarter. Temporary employees and subcontractors are not eligible to accrue PTO.

Procedures

Availability

Following the employee's initial 90 days, the employee's PTO 'bank' will be credited with the PTO. Employees may request to utilize their PTO time following the introductory period.

Paid Time Off

PTO banks are based upon employees who work in a full-time capacity. Employees working a regular part-time earn PTO on a prorated basis. Length of service and position determines the amount of days the employee will receive. The month following the anniversary date of completing the required years of service, employees are entitled to the additional time in accordance with the table below.

Full-time PTO:*

Role	Sick Days/per year	Vacation Days**	Mental Health Days***
Hourly	5 days	5 days	3 days
Salary	5 days	6 days	4 days
Director	5 days	unlimited	4 days
Additional per 3 years of employment	.5 days	1 day	.5 days

**part-time accrual rates will be prorated, part-time employees are at a pro-rated rate from the Regular Full-Time table above*

***Vacation days must be requested and scheduled 2 weeks in advance, mental health days should be requested one week in advance.*

****Mental Health Days may be used as sick or vacation if an employee has depleted both of those banks.*

Use and Scheduling of PTO

Employees are required to use available PTO when taking time off from work. PTO is subject to supervisory approval, organizational staffing needs and established procedures. All PTO requests are subject to the approval of the employees supervisor (or their designee). Employees are required to use PTO time according to their regularly scheduled workday.

Vacation days must be scheduled *at least* 2 weeks in advance by completing the PTO request form on OneDrive. Mental Health days must be scheduled *at least* one week in advance by completing the PTO request form on OneDrive. If approved, employee should send a calendar invite with the dates of absence to supervisor. PTO may be taken in increments of as low as fifteen minutes.

Sick time use should only occur in truly unforeseen events (illness, injury, personal emergency, etc.). 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. If an employee arrives past a clean 15 minute mark (i.e. 10:00 am, 10:15 am, 10:30 am, 10:45 am, etc.) then they will be docked for the full 15 minute increment. For example, an employee who arrives at 10:10 am, will be docked for the full 15 minutes past the 10:00 am hour. If an II recognized holiday falls within the employee's scheduled PTO days, they will be paid for the holiday and will not need to use an accrued PTO day for the holiday.

II approved conferences, training required by II or specifically requested by II will be considered days worked and PTO time will not be docked. Absences for conferences or trainings not required or requested by II will be counted as PTO use. For more information about attending conferences or trainings on behalf of II please see the section of the manual titled "Staff Training and Development".

Closures due to inclement weather or other emergency issues are deducted from mental health PTO. Employees who have been with II for less than 90 days (still within their Introductory Period) will not have weather-related or other emergency closures deducted from PTO as they have not yet earned their bank.

For fiscal years when weather related cancellations/closures exceed 3 days, employees may choose to take additional days, using their vacation or sick PTO for up to 3 additional days. If the employee does not notify the Clinical Director of their choice to use PTO, unpaid time of will be assumed. Employees must notify the Clinical Director in writing no later than November 30th of the fiscal year in which the bad weather days occurred.

Employees are not permitted to utilize their PTO time on program-wide training days (with exception for illness/injury or emergency situations). Training days are outlined on the official calendar for the program.

Excessive Use of PTO/ Discipline

Abuse of PTO will not be tolerated. Unscheduled absences will be monitored. An employee will be counseled when at such time as there appears to be an inappropriate frequency of unscheduled absences and/or a pattern of unscheduled absences. Additionally, a return to work release may be required for absences in excess of five (5) consecutive working days to ensure the employee is well and medically able to return to work.

Use of PTO beyond the allotted balance that results in unpaid time off may be considered misuse of time and may result in corrective action, up to and including termination. The expectation is for all

employees to be present and reliable in their scheduled work hours.

Employees have the option to use available PTO time along with other approved Leaves of Absence. For example, if an employee is out of work due to a personal injury, Family Medical Leave Act (FMLA), disability, etc., they may choose to use some or all of their PTO time from any category in conjunction with their unpaid leave. This option allows employees the option to have some or all of their leave of absence paid, as opposed to a fully unpaid leave.

Year End PTO

Any unused days will be forfeited unless they are used by the end of the calendar year. Bank will replenish on January 1 of the next year.

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**.

Years of Employment	Maximum Rollover Allowed
1 year	1 day
2 years	2 days
3 years	3 days
4 years	4 days
5+ years	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.

Administrative Guidelines

- **Cap:** Total PTO (standard + bonus + rollover) may not exceed 40 hours over the annual organizational maximum (e.g., 96 hours + 40 hours= 136).
- **Expiration:** Bonus time must be used within **12 months** of being earned.
- **Eligibility Pause:** Employees on performance improvement plans are ineligible for bonus PTO during that review period.

For information regarding a Summons for Jury Duty or to serve as a Court Witness please see the Jury Duty/Court Witness Summons policy in this manual.

Holidays and Scheduled Closure Days/Weeks

II's Adult Program observes the following paid holidays:

- New Years Eve & New Year's Day
- Martin Luther King Jr. Day
- Spring Long Weekend (TBD each year)
- Memorial Day
- Independence Day
- Labor Day
- Veteran's Day
- Thanksgiving; Wednesday, Thursday & Friday
- Christmas Eve & Christmas Day

See II's Program calendar for the current year for specific dates. Holidays that fall on a Saturday or Sunday will be observed on either the preceding Friday or following Monday as directed by management. If a recognized holiday falls during an employee's paid time off, holiday pay will be provided in place of the paid time off that would otherwise have applied.

Holidays are not considered for the purpose of determining overtime.

No holiday pay will be paid to an employee who is on any type of unpaid leave or who is not working due to workers' compensation injury.

Religious Holidays

Although II respects the right of each employee to worship as his/her faith dictates, it is not practical to provide time off with pay for all religious holidays. Employees may request, according to existing procedures, to use PTO for any religious holiday they wish to observe. Approval, however, is not automatic and is subject to program and client needs.

Parental Leave

Eligibility

Employees employed on a regular part-time or full-time basis for longer than one (1) year, are eligible for up to twelve (12) weeks of unpaid leave. The exception is the Combined Limitation specified for Spouses who are both employed at II described in Family and Medical Leave section in this manual.

However, employees who are not eligible for (those employed less than one (1) year) may nonetheless be eligible for leave under the Texas Parental Leave statute. Under this leave policy, II will grant eight (8) weeks of unpaid leave to a pregnant employee, an employee who is about to become a parent, or an employee adopting a child under eighteen (18) years of age (or under twenty-three (23) years if the child is disabled). The following conditions must be met:

- A birth or adoption must have occurred; the leave can be taken only after a birth or adoption.
- The employee must have been employed on a regular part-time basis or full-time basis by II for a minimum of three (3) months.
- The employee must provide two (2) weeks written notice to management of the anticipated date of departure and state in writing to the same the intention to return to his/her position; the employee must also state the anticipated date of return to work.

Procedures

During any portion of leave, no paid time off will be accrued.

During the leave, health benefits remain in force as long as the employee continues to contribute the same amount during the leave as was paid before as an active employee. Alternatively, amounts maybe prepaid prior to the commencement of leave and may be coordinated with management. Other benefits resume as of the date of returning to active full-time employment.

Parental leave will not affect the employee's right to receive paid time off, advancement or other benefits for which he/she was eligible at the date of his/her departure.

Employees anticipating Parental Leave who wish to use unused paid time off during all or part of the leave may do so and should submit the request in writing to the Clinical Director prior to taking the leave.

Upon returning to work, all attempts will be made to restore the employee to the previous or similar position, unless business conditions prevent the company from doing so.

Return from Parental Leave

If the employee does not return after twelve (12) weeks (or eight (8) weeks if employed less than one (1) year) but returns within one (1) year, II will make every effort to offer the employee a position but cannot assure that the position will have the same status or pay for which the employee was eligible prior to the leave. However, it will be increasingly difficult to hold the job open and II cannot guarantee that a position will be available. Any prior length of service will be retained and preference will be given concerning available positions for which the employee is qualified.

II Parental Leave Benefit

Employees employed for at least three (3) years as of their date of going out on Parental Leave who have committed in writing to returning to work in the same capacity as prior to going on leave are eligible to be compensated for up to six (6) weeks at the salary he/she is being compensated at as of the date of leave. If an employee decides to not return to work during their leave or once they return to work to terminate their employment with Independent Identity, and it is less than 90 days from their return to work date, they will be expected to payback II the total costs of premiums on a prorated scale. Health insurance will be cancelled on the date the employee provides to II as their termination date.

Spouses Who Are Both Employed by II —combined limitation

Spouses employed by II are jointly entitled to a combined total of (12) weeks in the twelve (12) months period of family leave for the birth and care of a newborn child, for placement of a child for adoption or foster care, or to care for a parent suffering from a serious health condition.

Maintenance of Health Insurance

During parental leave, II will continue the employee's medical insurance coverage provided that the employee pays the regular employee share of such coverage on a timely basis. During any paid leave, the employee's share of the premiums will be deducted from the employee's pay. During the unpaid portion of leave, the employee will be required to pay the employee share either prior to commencing unpaid leave or on an ongoing basis throughout the unpaid leave. Arrangements can be made to have premiums deducted from pay prior to the leave or to reimburse II on a consistent, bi-weekly basis. The Director should be contacted by the employee prior to going on unpaid leave to make the appropriate payment arrangements. If any payment is more than 30 days overdue, II may cease providing the benefits until the employee returns to work. Any employee not returning to work will be required to repay the employer's contribution made during the leave.

Military Leave

Leave is provided for II employees who must be absent from work because of service in the Uniformed Services. The Uniformed Services consist of the following military branches: (a) Army, Navy, Marine Corps, Air Force or Coast Guard; (b) Army Reserve, Naval Reserve, Marine Corps Reserve, Air Force Reserve or Coast Guard Reserve; (c) Army National Guard or Air National Guard; (d) Commissioned Corps of the Public Health Service; (e) any other category of persons designated by the President in time of war or emergency.

Service in the Uniformed Services means duty on a voluntary or involuntary basis in a Uniformed Service including: (a.) active duty; (b.) active duty for training; (c.) initial active duty for training; (d.) inactive duty training; (e.) full-time National Guard duty; (f.) absence from work for an examination to determine a person's fitness for any of the above types of duty,

Leave will not be extended to employees whose positions are brief or non-recurrent and which cannot be reasonably expected to continue for a significant period.

Notice

All employees who wish to take advantage of this leave must provide advance notice of military service. Notice must be given to the Executive Director in writing. Notice may be provided directly by the employee or by an appropriate officer of the branch of the Military in which the employee will be serving. However, no notice is required if giving of notice is impossible, unreasonable or military necessity prevents the giving of notice.

Duration of Service

The cumulative length of an employee's leave may not exceed five (5) years, with the following exceptions: (a) service required beyond five (5) years to complete an initial period of obligated service; (b) service from which an employee, through no fault of his/her own, is unable to retain a release within the five (5) year limit; (c) required training for Reservists and National Guard members; (d) service under an involuntary order to or to be retrained on, active duty during domestic emergency or national security related situations; (e) service under an order to, or to remain on, active duty (other than for training) during a war or national emergency declared by the President or Congress; (active duty (other than for training) by volunteers supporting "Operational Missions" for which selected Reservists have been ordered to active duty without their consent;

(g) service by volunteers who are ordered to active duty in support of a "critical mission or requirement" in times other than war or national emergency and when no involuntary call-up is in effect; (h) federal service by members of the National Guard called into action by the President to suppress insurrection, repel an invasion, or execute the laws of the United States.

Re-Employment

To be entitled to re-employment rights, the employee must separate from military service under honorable conditions. The following separation categories are deemed to be dishonorable upon which the employee is provided no re-employment protection: (a) separation from the service with a dishonorable or bad conduct discharge; (b) dismissal of a commissioned officer in certain situations involving a court martial or by order of the President in time of war; (c) dropping a commissioned officer from the roles when the officer has been absent without authority for more than three (3) months or who is imprisoned by a civilian court; (d) separation from the service under other than honorable conditions. Regulations for each military branch specify when separation from the service would be considered "other than honorable."

Reporting Back To Work

Employees wishing to return to work must do so within the following time periods which are dependent on the duration of the employee's military service: (a) service of one to 30 days — the employee must report to work by the beginning of the first regularly scheduled work day that would fall eight (8) hours after the person returns home. If, due to no fault of the employee, timely reporting back to work would be impossible or unreasonable, the employee must report back to work as soon as possible. (b) service of 31 to 180 days — an application for re-employment must be submitted no later than 14 days after completion of a person's service. If submission of a timely application is impossible or unreasonable through no fault of the employee, the application must be submitted as soon as possible. (c) service of 181 or more days — an application for re-employment must be submitted no later than ninety (90) days after completion of a person's military service.

The reporting or application deadlines stated above are extended for up to two (2) years for employees who are hospitalized or convalescing because of a service-connected illness or injury.

Documentation Upon Return

Documentation showing eligibility for employment may be requested of employees who have been on leave for a period of thirty-one (31) days or more. Such documentation may include: (a) the employee's application for re-employment is timely; (b) the employee has not exceeded the five (5) year service limitation; and (c) the employee's separation from service was under honorable conditions.

If an employee does not provide satisfactory documentation because it is not readily available or does not exist, re-employment will be granted with the condition that documentation will be provided as soon as it is available.

Re-employment Position

Except with respect to employees who have service-connected disabilities, the position into which a person is reinstated is based on the length of the employee's military service. (a) One to 90 days: an employee whose military service lasted one to 90 days must be promptly employed in the following order of priority — (i) in the job the employee would have had had the person remained continuously employed so long as the employee is qualified for the job or can become qualified after reasonable efforts; or (ii) if the employee cannot become qualified for the position that he/she would have held, then in the employee's pre-service position so long as the employee is qualified for the job or could become qualified after reasonable efforts; or (iii) if the employee

cannot become qualified for the pre-service position, then in any other position of lesser status and pay that the employee is qualified to perform with full seniority. (b) 91 or more days: The reinstatement position for employees who have served 91 or more days shall be promptly re-employed in the following order of priority — (1) in the job the employee would have held had the employee remained continuously employed or a position of equivalent seniority, status, and pay so long as the person is qualified for the job or can become qualified after reasonable efforts; or (ii) if the employee cannot become qualified for the position it would have held then in the employee's pre-service position, or a position of equivalent seniority, status and pay so long as the person is qualified for the job or could become qualified after reasonable efforts; or (iii) if the employee cannot become qualified for the pm-service position than in any other position of lesser status and pay that the employee is qualified to perform with full seniority.

It will make reasonable efforts to qualify returning service clients who are not qualified for re-employment positions that they otherwise would be entitled to hold for reasons other than service-connected disability. Such efforts may include not only refresher training but also any training necessary to update the returning employee's skills.

Service-Connected Disabilities

Reasonable efforts will be made to accommodate a returning employee's disability so that the employee can perform the position the person would have held if the employee had remained continuously employed.

If, despite reasonable accommodation efforts, the employee is not qualified for the position that he/she previously held due to his/her disability, the employee will be employed in a position of equivalent seniority, status and pay, so long as the employee is qualified to perform the duties of the position or could become qualified to perform them with reasonable efforts.

If the employee does not become qualified for the equivalent position, then the employee will be provided with a position that is consistent with the circumstances of that person's case, most nearly approximates an equivalent position in terms of seniority, status and pay.

Employment will not be provided an employee on military leave if circumstances have changed so much that re-employment will be impossible or unreasonable, such as in the case of a reduction-in-force that would have included the person on leave.

Rights of Re-employed Persons

Seniority Rights: Re-employed service members are entitled to the seniority and all rights and benefits based on seniority that they would have attained with reasonable certainty had they remained continuously employed. A right or benefit is seniority-based if it is determined by or accrues with length of employment service. Conversely, a right or benefit is not seniority-based if it is compensation for work performed or is subject to a significant contingency. Returning employees are entitled to not only the rights and benefits that were available at the time that they left for military service but also that became effective during their military leave.

If, prior to leaving for military service, an employee provides clear, written notice of the intent not to return to work after military service, the employee waives entitlement to leave of absence rights and benefits. At the time of providing this notice, the employee must be aware of the specific rights and benefits to be lost. Such notice will not waive re-employment rights.

Paid Time Off: Employees will be permitted to use any paid time off that had accrued before the beginning of the military leave instead of unpaid leave. However, employees are not required to use paid time off.

Protection from Discrimination: No employee will be discriminated against for hiring, promotion, re-employment, termination and benefits because of past, current or future military obligations.

Jury Duty/Court Witness Summons

II recognizes the duty of employees as citizens to serve on juries or as court witnesses. Employees summoned to serve on a jury, or required by subpoena to appear as a witness in court, are paid by II the difference between any fee received from the court and the employee's normal pay for a period of up to five (5) days.

In order to receive this pay differential, the employee must:

- Inform supervisor of their intention to be absent from work to serve jury duty or as a witness.
- Upon return to work provide a record from the court indicating the date(s) time(s) served on jury duty or as a subpoenaed witness.*
- Upon receipt of jury duty/witness pay, the employee should provide II with a copy of their payment check. The amount of payment will be deducted from the next payroll.

*Time out of work for jury or witness duty will be recorded as, and deducted from, paid time off (PTO), until such time as the employee submits the documents outlined above

As court duty often does not require a full time commitment, employees are expected to report to work on days or reasonable portions of days when attendance in court is not required. Additionally, the court witness policy does not apply to an employee who is a plaintiff or defendant. If an employee must appear in court as the plaintiff or defendant, the employee must utilize their PTO if they are absent from work. It is the employee's responsibility to inform supervisors as soon as possible to their need to serve as a witness or juror.

Time incurred by an employee who is required to serve as a witness in court on behalf of II will be considered as time worked and paid for accordingly.

II does not pay employees for jury/witness service in excess of five (5) days. Employees may use accrued PTO time if necessary for jury or witness duty which exceeds five (5) days. No employee shall be discharged or retaliated against as a result of absence due to jury or witness duty of any length.

Bereavement Leave

In the event that a member of an employee's family passes away, he/she will be granted time off with pay. If the loss occurs within the immediate family (i.e., spouse/significant other*, parent, child, grandmother, grandfather, brother or sister or the employee's spouse's/significant others parent, child, brother or sister) bereavement leave of up to three (3) days will be granted for making arrangements for services, attending services and/or attending to matters related to the death of the loved one. One paid day will be granted to attend services in the event of a relative's death when that relative is not in the immediate family (e.g., aunt, uncle or cousin). Bereavement Leave is pro-rated for part-time employees.

Extended bereavement for staff who lose an immediate family member (spouse/significant other, parent, child or the employee's spouse's parent, child):

- Once an employee exhausts the 3 days of paid bereavement leave, they are allowed to use any available PTO and may choose to take a leave of up to 14 days without pay without penalties. If the employee chooses to take a leave of absence of up to 14 days, they are not required to use PTO. It will continue to pay employee's benefits while they are out for an extended bereavement. Employees will be responsible for paying their portion of benefits during any period of unpaid leave.
- If an employee requires more than a 14 days leave of absence; the employee needs to contact the Clinical Director to make the requests.
- Employee should contact their supervisor first with the initial bereavement requests. Supervisor will communicate to Directors if there is a possibility the staff will need to request an extended leave of absence.

*Significant other defined as living together for at least 6 months.

Leave Without Pay

Unpaid leave may be granted by II's Executive Director, President or the Clinical Director to employees for extenuating circumstances but only after accrued benefits have been exhausted. An employee must submit to his/her supervisor a written request for unpaid leave specifying the reason for the leave and anticipated duration of the leave. Unpaid leave, in general, cannot exceed ninety (90) days. Employees are not eligible to accrue benefits during an unpaid leave.

The Clinical Director may authorize or deny a leave based on the circumstances surrounding the request, the duration of the leave, the program's status and clients needs at the time of the request. The employee's position is not guaranteed upon return from leave. However, II will try to assign the individual to a similar position with equivalent pay and benefits.

Abuse of any part, or all, of II's leave policies constitutes absenteeism, and employees will be subject to disciplinary actions up to and including termination.

Merit Based Bonus Time

Staff Performance-Based Bonus Time Incentive Policy

Purpose

Independent Identity recognizes the critical role staff play in delivering high-quality behavioral services. This Performance-Based Bonus Time Incentive Program is designed to reward staff for excellence in reliability, professionalism, and clinical performance. Staff may earn up to six (6) additional bonus days per year based on quarterly

performance evaluations, with rollover benefits that increase with continued employment.

Eligibility

- Available to all non-director staff who have been employed for at least **six (6) months**.
- Performance is evaluated **quarterly** by the employee's direct supervisor.
- Incentive bonus time is credited at the **start of the following quarter**.

Incentive Structure

Staff can earn up to **1.5 days of bonus time per quarter**, for a maximum of **6 days annually**.

Performance Rating	Description	Bonus time Awarded per Quarter
Exemplary (21-25)	Consistently exceeds standards across all domains	+1.5 days
Proficient (16-20)	Consistently meets expectations with occasional areas for growth	+1 day
Competent (<15)	Inconsistent or below expected performance	+0.5 days

Performance Criteria

Performance evaluations will be based on score from the Staff Evaluation Matrix:

Category	Exemplary(5)	Proficient (4)	Competent (3)	Developing (2)	Needs Improvement (1)	Comments / Evidence
Professionalism	Always punctual, maintains appropriate dress and hygiene, communicates respectfully with peers, clients, and families, and models professionalism.	Arrives on time, treats other with respect and communicates with respect, completes most tasks on time with few exceptions.	Arrives on time. Usually professional, but needs reminders about communication or task follow-through.	Needs occasional reminders to arrive on time, communicate respectfully, and task follow through.	Frequently late or unprofessional in conduct, or resistant to feedback.	
Organization and Productivity	Maintains an exceptionally clean, organized, and HIPAA-compliant environment. Program materials and billing are always current. Monitors graphs on weekly basis, BSP and progress reports are updated and signed in client file. Completes all notes by Monday of following week.	Maintains clutter free environment, meets completes all notes by Monday of following week with few exceptions, effective of document management, monitors graphs on weekly basis with few exceptions.	Keeps workspace reasonably organized but occasionally falls behind on reports or billing notes. Ensures graphs are being updated by techs most of the time.	Needs admin reminders to complete reports, billing notes, staff graphing reminders more than twice per month.	Disorganized workspace or inconsistent data completion that impacts service quality or processes.	
Program Implementation	Implements programs with fidelity and consistency — demonstrates strong understanding of ABA principles, prompt hierarchy, and reinforcement schedules. Always verifies MO and uses varied SDs. Meets all 12 criteria on II BCBA Expectations Sheet.	Occasionally needs reminders to update programming for clients and train staff in time efficient manner. Completes all other items on II BCBA Expectations Sheet.	Implements programs with occasional feedback required for consistency or accuracy (expected for newer BCBA's). Needs more frequent reminders to complete progress reports, update programs, and train staff on new procedures.	Programming is still an emerging skill. Is able to effectively program with support from BCBA on all steps (identifying when a goal is mastered, selecting new goal, training staff, keeping data sheets updated, etc.) Needs frequent reminders to complete progress reports/documentation	Regularly fails to follow program procedures or misses data collection or reinforcement steps, even after substantial support.	

Behavior Support	Responds to behaviors exactly as outlined in plans, directs questions to CD or Senior BCBA, models calm composure during instances of escalated behavior, ensures safety while using Safety Care measures, and effectively reinforces replacement behaviors. Does not shy away from error correcting challenging behavior when needed. Effectively trains staff on behavior-change procedures.	Occasionally needs reminders to correctly respond to behavior according to BIP. Effective at staff training, responding to most behaviors across clients, models calm composure.	Generally follows plans but may hesitate or need more than two reminders during higher-intensity behavior episodes, or effectively training staff.	Needs frequent reminders to respond correctly to high-intensity behaviors, or correctly train staff to reduce likelihood of behavior from occurring.	Inconsistent or inappropriate responses during behavior interventions; requires retraining.	
Feedback and Training	Actively seeks feedback, applies it immediately, asks questions to improve, and shares relevant information with the BCBA in timely manner. Takes accountability for mistakes and is able to move on. Maintains all BACB required documentation.	Needs occasional guidance on implementing feedback and being accountable for work. Trains staff in ABA principles effectively with minimal supervisor support. Maintains all BACB required documentation.	Accepts feedback but may need reminders to apply it consistently. Requires regular meetings with supervisor to effectively train staff (expected for newer BCBA's). Needs guidance to maintain BACB documentation.	Occasionally resistant to feedback. Needs substantial support to effectively train staff in ABA principles.	Resistant to feedback or fails to implement supervisor recommendations.	

Rating	Description
5 – Exemplary	Consistently exceeds expectations. Demonstrates mastery of all responsibilities and serves as a model for others. Proactively supports the mission of Independent Identity, maintains professionalism at all times, and ensures exceptional quality in ABA implementation and client support.
4 – Proficient	Meets and often exceeds expectations. Performs duties independently with minimal supervision. Maintains high standards of professionalism, accurate documentation, and consistent adherence to ABA protocols. Demonstrates reliability and initiative.
3 – Competent	Meets most expectations. Performs duties adequately but may need occasional feedback or reminders. Maintains professionalism and follows established procedures but has room for greater consistency or independence.
2 – Developing	Inconsistently meets expectations. Requires frequent guidance or reminders. Shows potential but needs improvement in reliability, organization, or fidelity to ABA procedures. May inconsistently follow feedback or documentation requirements.
1 – Needs Improvement	Does not meet expectations. Performance or professionalism consistently below standard. Requires ongoing supervision, retraining, and direct intervention to meet Independent Identity's minimum requirements.

★ Employee Standards

Social Media

Under no circumstance should employees be posting pictures, specific stories or content regarding II clients on their personal social media. This includes all social media outlets (Facebook, Instagram, snapchat, TickToc, etc.) All of our clients deserve the right to privacy and posting pictures and/or stories on personal accounts is a violation of their privacy. Parents/guardians may or may not have provided consent for their child to be on II's social media but this consent doesn't extend to postings made on a staff member's personal social media account. If an employee takes a photo to send to Supervisor, it should only be sent to the Direct Supervisor and it must not be shared with anyone further after doing so.

Independent Identity expects employees to use good judgment and forethought when utilizing personal social media to post personal comments or opinions that could cause harm to the company, its employees, or its clients.

Employees must refrain from using social media while on work time or on company equipment, unless it is work-related as authorized by a manager or consistent with the Electronics Assets Usage policy. Employees may not use company email addresses to register on social networks, blogs, or other online tools utilized for personal use.

Employees should not speak to the media on the company's behalf without contacting the Executive Director. All media inquiries should be directed to the Executive Director.

If an employee has questions or needs further guidance, they should the Executive Director.

Cell Phone Use Policy

Personal cell phone and headphone use is not allowed during working hours while employees are scheduled with a client(s). When an employee is working with a client, they may have their cell phone on them (on silent

or vibrate) and use it for work tasks, but it may not otherwise be visible. This means it can be in the employee's pocket or otherwise on their person, but not in use (unless it is related to a client program/issue or photos through lineleader or teams). Under no circumstances should an employee be personally using social media, listening to music/podcasts, playing games, etc. during program hours. If an employee needs to use their cell phone for a personal matter it is their responsibility to find coverage for their client so they can step away and use their cell phone.

Staff should not be texting each other (outside of teams) during program hours unless it is related to a client and cannot be communicated in another way. We would like to maintain a professional work environment and it is not appropriate to use text messaging or engage in group texting to discuss clients or other staff members as this is a violation of their privacy and could be destructive in nature. If an employee is having any issues with clients or staff members that need to be addressed, they should bring them to their mentor and/or appropriate administrator. Inappropriate use of cell phones will not be tolerated.

Professional Employee Standards

Employees of II are expected to be professional, responsible, respectful and cooperative. Conduct that interferes with program operations, discredits II or is offensive to clients, students or co-workers is unacceptable. All therapists and supervisors will abide by the ethical guidelines outlined at <http://bacb.com/ethics/> These guidelines are provided for informational purposes only and are not intended to be all-inclusive. Nothing here is intended or will be construed to change or replace, in any manner, the at-will employment relationship between the company and the employee.

Standards of conduct include but are not limited to:

- Promotion of the health and well-being of clients and staff
- Cooperation with team members, peers and supervisory personnel
- Compliance with safety policies and safety procedures
- Punctuality
- Reliability
- Compliance with instruction and supervisory directives
- Satisfactory quality and quantity of work
- Attendance at required meetings and training
- Confidentiality
- Respectful of differences

Failure to meet these standards will be considered cause for disciplinary action, up to and including termination.

The following represents a partial listing of violations to employee's standards. Any other type of infraction not specifically addressed below may also result in a disciplinary action, including immediate termination:

- Failure to follow the program's policies and procedures
- Misuse of paid time off (PTO)
- Insubordination

- Unauthorized use of II facilities and equipment
- Providing false information on client records or pursuant to an investigation
- Changing, altering, modifying or destroying official documents
- Removal of any company records without written permission from a Supervisor, the President, Executive Director, or Program Director
- Possession of dangerous weapons or devices
- Misuse or misappropriation of II or client funds
- Leaving premises during work for personal reasons without authorization; performing unauthorized personal work on company time
- Immoral or indecent conduct
- Bringing unauthorized persons onto II property
- Disclosing confidential information to unauthorized persons
- Excessive absenteeism, tardiness or failure to work scheduled hours
- Abusive/inappropriate language
- Violation of state or federal regulations or laws
- Unsatisfactory job performance; interfering with another employee's job performance
- Inappropriate attire
- Negligence, carelessness or inconsiderate treatment of II clients and/or their matters/files
- Use or possession of intoxicating beverages or illegal use or possession of narcotics, marijuana, or drugs (under state, federal, or local laws), on company premises during working hours or reporting to work under the influence of intoxicants or drugs so as to interfere with job performance, or having any detectable amounts of illegal drugs in an employee's system
- Falsification of one's employment application, medical, or employment history

These are general rules and are not intended to hinder or in any way curtail the rights of free speech or free expression of ideas. Therefore, such activity by employees during non-working time, including meal and rest periods, is not restricted so long as such activity does not interfere with the orderly and regular conduct of the company business, is lawful, in good taste, conducted in an orderly manner, and does not create safety hazards or violate general good housekeeping practices.

Attendance

Punctuality and regular attendance are essential to the consistency and smooth operation of II. All staff members are expected report to work on time. Office hours are 8:00 A.M. to 4:30 P.M. Monday through Friday. The nature of our business may sometimes demand workday or workweek hours different than those set forth above. Variation to the schedule will be made or approved by the Clinical Director.

Unsatisfactory attendance including tardiness and leaving work early is considered unacceptable job performance. Employees will be rated in their performance appraisal in the categories of attendance and punctuality.

If an employee has advance notice of their need to be out of work, they should submit a PTO Request via one drive forms to schedule the time off. If an employee is unable to report to work due to an unforeseen circumstance, he/she must call II to report their absence between 5:00am and 7:00am on the morning of the absence and provide a brief reason for their absence. Late call ins or notifications of tardiness/absence should

only be used in extreme emergencies. If, for any reason, an employee expects to be late, he/she must call into II and speak with their supervisor and leave a reason for the tardiness and anticipated time of arrival to II.

If an employee is ill, injured, or an unexpected emergency arises which prevents them from coming to work, the employee must notify their supervisor ASAP. If an employee is physically unable to contact the company, he/she should direct another person to make the contact on his/her behalf. Leaving a message with a fellow staff employee or with the answering service is not considered proper notification. When an employee calls in absent, he/she is to advise the company of the expected date of return.

If an employee becomes ill at work, he/she should notify the clinical director immediately. If an employee is unable to perform his/her job tasks he/she may be sent home for the remainder of the day or until able to work again. Employees will have the option of applying PTO or taking unpaid time off.

The company may request a medical statement from the employee's doctor when an employee is absent from work due to illness for more than three working days.

Unreported absences will automatically be considered lost time and will be entered into payroll records as unpaid time. An absence which is unreported for two consecutive days may be considered a voluntary resignation. Excessive absences or tardiness will be subject to disciplinary action and may be considered grounds for termination.

Attendance During Inclement Weather

To ensure the safety of our clients and our staff, II management may make a decision to close the program due to inclement weather. II will follow the closure decisions of Austin Independent School District. If II's Program is to be closed or delayed due to inclement weather a text message will be sent to all staff. The information will also be posted on II's website at www.independentidentity.org, on the official II Facebook page and Instagram.

Staff should assume the Program will still remain open unless otherwise communicated as noted above. Each employee should exercise their best judgment with regard to road conditions and other safety concerns.

Dress and Personal Appearance

II regards its employees as its representatives to the public and as role models for its clients. It is expected that employees will exercise good judgment as to what constitutes proper dress and good grooming. In general, the appearance of employees is expected to meet the safety and comfort requirements of their position but should nonetheless be neat, clean and professional, as working conditions permit. This applies to all work-related events, meetings, community events, etc. on or off campus.

II will provide two T-shirts and any additional T-shirts will cost \$10.

Articles of clothing with printed words or symbols that are sexually explicit or suggestive, portray/support drugs or alcohol or that demeans any person or group on the basis of age, ethnic background, disability, national origin, race, sex or sexual preference are prohibited.

For safety reasons, exposed body piercing, other than small earrings/studs, are prohibited for employees working directly with clients. To avoid injury, employees must wear rubber-soled shoes and avoid shoes with

open toes, heels or elevated platforms. Hair should be combed and orderly. Long hair should be pulled back or employee should have a hair tie handy.

Lower Garments			
Appropriate			Inappropriate
<ul style="list-style-type: none"> • Jeans 			<ul style="list-style-type: none"> • Visible undergarments
<ul style="list-style-type: none"> • Khakis or Corduroys 			<ul style="list-style-type: none"> • Any lower garment where skin may be exposed higher than 6 inches above the knee
<ul style="list-style-type: none"> • Leggings 			
<ul style="list-style-type: none"> • Modest exercise Pants/Workout Wear 			
<ul style="list-style-type: none"> • Shorts* • 8 			<ul style="list-style-type: none"> • Any garment that is sheer, allowing undergarments to be visible or skin to be visible higher than 6 inches above the knee
<ul style="list-style-type: none"> • Skirts* 			
<ul style="list-style-type: none"> • Dresses* 			
<ul style="list-style-type: none"> • Capri Pants 			
Upper Garments			
Appropriate			Inappropriate
<ul style="list-style-type: none"> • Polo collar shirts 			<ul style="list-style-type: none"> • Visible undergarments
<ul style="list-style-type: none"> • Company logo wear 			<ul style="list-style-type: none"> • Tops that expose the wearer's midriff
<ul style="list-style-type: none"> • Short-sleeved blouses or shirts 			<ul style="list-style-type: none"> • Tops that expose the wearer's chest

• Sleeveless blouses or shirts			• Sleeveless garments with straps that are thinner than 1 inch (including spaghetti straps)
• Turtlenecks			
• Blazers or sport coats			
• Jackets or sweaters			• Sheer garments without an opaque undershirt
• T-shirts or sweatshirts			
• Modest exercise wear			
Footwear			
Appropriate**			Inappropriate
• Boots			• Shoes with open toes
• Sneakers			• Shoes with heels
• Flats			• Shoes with 'platform' sole
• Loafers			• Slippers
• Moccasins			
• Crocs			

Cut of the garment must be no more than 6 inches above the knee of the wearer

*All appropriate footwear assumes a rubber sole

Employees should be mindful that all garments are of the appropriate length, cut/or fit to meet the requirements outlined above while sitting, moving and/or bending.

It expects its employees to dress appropriately and engage in regular grooming practices when reporting for work/work-related function. Employees who dress inappropriately may be asked to leave to change their attire. Time taken to change into appropriate wardrobe will not be compensated. Repeated infractions may be cause for disciplinary actions.

Nicotine Use and Break Policy

Updated 1/5/2026

Purpose

We aim to maintain a healthy, respectful, and productive workplace for all employees, including those who use nicotine products and those who do not.

Scope

This policy applies to all employees while working onsite or offsite, representing the company during work hours.

Nicotine Products

Nicotine products include, but are not limited to: cigarettes, cigars, pipes, e-cigarettes, vaping devices, and smokeless tobacco products.

Where Nicotine Use Is Permitted

- Smoking and vaping are **not permitted indoors** or in company vehicles.
- Smoking and vaping are permitted **outdoors only**, away from entrances, doors, and windows, and in a manner that does not impact others.
- Employees must properly dispose of all waste in external trash cans to minimize odors.

Breaks and Fairness

- Employees receive **one unpaid 30-minute meal break**, during which they must clock out.
- In addition, employees may take **brief step-away breaks** as needed for personal reasons (e.g., fresh air, stretching, personal needs, or nicotine use), provided:
 - Breaks are short in duration (< 5min)
 - Work coverage, ratios and productivity are maintained, and
 - Breaks are not excessive or disruptive.

Nicotine use does **not** create additional paid break time. Employees who require longer or more frequent breaks should use their meal break or coordinate unpaid time with their manager.

Meetings and Coverage

- Employees should not step away for nicotine use during meetings or critical work periods unless approved by a manager.
- Employees are expected to coordinate with teammates to ensure coverage.

Courtesy

- Employees should take reasonable steps to minimize lingering odors when returning to shared spaces.

Client Safety

- All nicotine products must be secured with employees' personal belongings in an area clients cannot access.

Questions

All employees are expected to comply with this policy. Repeated violations may result in progressive disciplinary action in accordance with company policy. Employees with questions about this policy or break expectations should speak with the Clinical Operations Coordinator.

 Health, Safety & Security

Controlled and Illegal Substances

II is committed to protecting the health, safety and welfare of its employees by providing a work environment that is free of substance abuse. II intends to preserve its professional standards of excellence and will not allow substance abuse by any staff member to impede its ability to provide our clients with premium service.

Accordingly, II has developed the following guidelines on controlled and illegal substances. These guidelines are designed to ensure that our workplace is safe and productive. They articulate II's position that substance abuse will not be tolerated. The policy also reflects our concern for employees who have a substance abuse problem and encourage those individuals to seek counseling and treatment.

Treatment and Assistance

II supports its employees in seeking professional help and treatment of substance abuse problems/substance use disorders which may affect their personal lives or job performance.

An employee's job will not be jeopardized for seeking help for substance abuse problems. However, such participation by itself does not protect an employee from appropriate disciplinary action should there be a breach of the conditions of employment, a violation of general II guidelines, policies and procedures or should job performance fall below an acceptable level.

Substances Addressed

The following are definitions of substances that are subject to the Guidelines (the definitions are supplied for informational purposes only and are not meant to be all-inclusive):

- Alcohol: Includes alcoholic beverages such as: beer, wine, liquor, cordials, etc.

- **Controlled/Illegal Substances:** Includes all forms of drugs and chemicals such as: stimulants, narcotics, depressants, hallucinogens and other substances prohibited or restricted by law. Such items include but are not limited to: tranquilizers, heroin, crack, marijuana, LSD, cocaine, etc. Controlled/illegal substances also include any prescription drugs or chemicals not used for their appropriately prescribed use or purpose. (Medically prescribed drugs used in the prescribed manner do not fail under the definition of controlled/illegal substances.)

Prohibited Activities

The following activities are prohibited for all II employees:

- The consumption of alcohol on II's premises, whether or not the consumption takes place during regular business hours. This does not apply to appropriate use at II-sponsored or catered functions, events or meals.
- Possession on II premises of any alcohol that is not in its original manufacturer's container with unbroken seals (except for II-sponsored events as noted above).
- The possession, use, sale, purchase, transfer, transportation or distribution of controlled/illegal substances on II's premises or while engaged in II business away from II's premises.
- Consumption of alcohol, use of controlled/illegal substances or being under the influence of such to the extent that they interfere with an employee's job performance, thereby rendering the employee unfit to perform assigned job duties or causing the employee to be a potential safety risk to our clients, himself or herself, the employee's co-workers, or II property.
- Use of prescription or over-the-counter medication that is impairing or has the potential to impair performance and behavior during work hours.

Disciplinary Action and Possible Consequences

Employees are subject to disciplinary action, up to and including termination, if they:

- Engage in any of the prohibited activities described above, or
- Engage in such prohibited activities which result in, or cause, actually or potentially adverse publicity affecting II's reputation or its ability to serve its clients.

Reporting Procedures

It is II's intention that procedures for reporting substance abuse problems balance its intolerance for substance abuse with its concern for and the privacy of its employees. To this end, the following guidelines are intended to be a framework for dealing with substance abuse problems:

- Any employee who has a reasonable suspicion of, or who observes, prohibited substance abuse actions by a co-worker, subordinate or superior is expected to report the matter to the Executive Director, President, or Program Director. In no event should these matters be discussed with any other employee.
- Any suspicion or confirmation of substance abuse is a sensitive matter and is to be handled in a confidential, reasonable and professional manner by the parties concerned. Any employee who violates the confidential nature of such information by discussing these matters with anyone other than the individuals noted in the above paragraph may themselves be subject to disciplinary action which may include termination.

Searches and Testing

To protect the health, safety, and welfare of its clients and employees, II reserves the right to require any employee to submit to a search of their personal property and/or testing when reasonable suspicion exists as to the possession and/or consumption of controlled or illegal substances as described under Prohibited Activities. II reserves the right to search all areas of II as well as the employees' personal property brought onto II's premises, including but not limited to offices, files, briefcases, pocketbooks, pockets, backpacks, desks, personal vehicle (if used to transport staff and/or clients on behalf of II), etc. All searches and tests will be conducted only by the Executive Director, President, or Program Director, Human Resources, or an authorized designee with the express written approval of the Executive Director. No exceptions will be made

Furthermore, II reserves the right, as provided under applicable law, to require a suspected employee to submit to chemical and/or medical tests administered by a qualified physician or laboratory of II's choice. This test will be conducted only with the express written authorization of the Executive Director. If this test result is positive, the employee may be requested to undergo more precise tests. An employee's failure to comply with II's request for a search and/or test is grounds for disciplinary action up to and including termination.

Drug and Alcohol Free Workplace

Drug/Alcohol use and abuse at the workplace, prior to or while on duty, are subjects of immediate concern. From a safety perspective, the misuse of drug/alcohol may impact the well-being of II employees, clients, members, property and the public at large. Therefore, it is the policy of II that the unlawful manufacture, distribution, dispensation, possession or use of a controlled substance or alcohol is strictly prohibited in the workplace or while on duty and/or prior to reporting to work. Any employee violating this policy will be subject to discipline up to and including termination. Any employee may also be discharged, or otherwise disciplined, for any conviction involving illicit drug behavior, or driving under the influence of alcohol, regardless of whether the employee's conduct was detected within employment hours or whether his/her actions were connected in anyway with his/her employment. Being on II property, attending an II event, working with II clients or operating a vehicle on behalf of II while under the influence of a controlled substance or alcohol is strictly prohibited. The specifics of this policy are as follows:

- Any employee who gives or in any way transfers a controlled substance to another person or sells or manufactures a controlled substance while on duty regardless of whether the employee is on or off campus, will be subject to discipline up to and including termination.
- The term "controlled substance" means any drug listed in 21 USC 812 and other federal regulations. Generally, all illegal drugs and substances are included, such as marijuana, cocaine, codeine or opium additives, LSD, DMT, STP, amphetamines, methamphetamine and barbiturates.
- Employees are required to inform the Executive Director of any arrests which may adversely affect their role at II. Employees are required by law to inform an employer within five (5) days after he/she is convicted for violation of any federal or state criminal drug or alcohol statute. A conviction means a finding of guilt (including a plea of nolo contendere) or the imposition of a sentence by a judge or jury in a federal or state court.
- If an employee is convicted of violating any criminal drug statute while on duty, he/she will be subject to discipline up to and including termination. Conviction(s) while off duty may result in discipline or termination.

- II encourages any employee with a drug or alcohol problem to seek assistance. The administration can advise the employee as to sources of assistance available within the community

Abuse and Neglect Reporting

Abuse/Neglect (18 years of age and older)

All direct care employees and administrative employees are defined as mandated reporters under Texas Family Code Section 261.101 (a) regarding the prevention of abuse and neglect of an individual with disabilities age 18 years of age or older. If an employee is a mandated reporter and he/she has reasonable cause to believe that a student at II's Program has been subject to either abuse or neglect by a caretaker at the program or at a setting away from the program, the employee is required to make an immediate oral report to the Department of Family and Protective Services ("DFPS") with a written report to be submitted within forty-eight (48) hours. A verbal report and an incident report must always be filed immediately with II's Executive Director or Program Director even if the employee reported directly to DFPS.

To report to DFPS, call the 24-hour, toll-free abuse hotline at 1-800-252-5400 from anywhere in the United States to report abuse or neglect that happened in Texas.

No Solicitation Rule

Employees are not permitted to solicit, nor are employees to be solicited by anyone while on II's premises or during II's activities away from campus at any time or for any reason. Non-employees are not permitted on II's premises for solicitation purposes.

Document Retention & Destruction Policy

The Sarbanes-Oxley Act, which makes it a crime to alter, cover up, falsify, or destroy any document with the intent of impeding or obstructing any official proceeding, requires all public companies to establish a Document Retention & Destruction Policy. While this requirement does not apply to non-profit organizations, Independent Identity's (II) Board of Directors unanimously agreed to adopt such a policy as a matter of sound business practice. II follows the document retention procedures outlined below. Documents that are not listed, but are substantially similar to those listed in the schedule will be retained for the appropriate length of time.

<u>Corporate Records</u>	
Annual Reports to Secretary of State/Attorney General	Permanent
Articles of incorporation	Permanent

Board Meeting Minutes, Policies & Resolutions By-laws Construction Documents Fixed Asset & Depreciation Information IRS Application for Tax-Exempt Status (Form 1023) IRS Determination Letter State Sales Tax Exemption Letter General Correspondence	Permanent Permanent Permanent Permanent Permanent Permanent 3 Years
<u>Accounting & Tax Records</u> Annual Audits & Financial Statements IRS 990 Tax Returns Business Expense Records IRS 1099s Journal Entries Invoices Cash Receipts Credit Card Receipts	Permanent Permanent 7 Years 7 Years 7 Years 7 Years 3 Years 3 years
<u>Bank Records</u> Bank Deposit Slips Bank Statements & Reconciliations Electronic Fund Transfer Documents	7 Years 7 Years 7 Years
<u>Payroll & Employment Tax Records</u> Payroll Registers State Unemployment Tax Records Garnishment Records Payroll Tax Returns W-2 Statements	Permanent Permanent 7 Years 7 Years 7 Years
<u>Employee Records</u> Retirement & Pension Plan Documents	

Records Relating to Promotion, Demotion or Discharge	Permanent
Accident Reports & Worker's Compensation Records	7 Years
Salary Schedules	5 Years
BACKGROUND Forms	5 Years
	3 Years
	3 Years
Employment Applications	3 Years
I-9 Forms	3 Years
<u>Legal, Insurance and Safety Records</u>	
Insurance Policies	
Real Estate Documents including Appraisals	Permanent
Leases (after expiration of Lease)	Permanent
OSHA Documents	6 Years
General Business Contracts (after termination of contract)	5 Years
	3 Years
<u>Student & Client Records</u>	
Admissions Information (after exit from program)	
Assessments and Evaluations (after exit from program)	7 Years
	7 Years
Consent and Release Forms (after exit from program)	7 Years
	7 Years
Contact Information (after exit from program)	7 Years
Emergency Information (after exit from program)	7 Years
	7 Years
Incident and Accident Reports (after exit from program)	Permanent
Individual Service Plans (ISP) (after exit from program)	Permanent
	7 Years
Day Habilitation Service Plans (DHSP) (after exit from program)	7 Years
	7 Years
Local Educ. Agency (LEA) contracts (after exit from program)	7 Years
	7 Years
Medical Information (after exit from program)	
Progress Reports (after exit from program)	
All Other Correspondence (after exit from program)	

Electronic Documents

All electronic documents will be retained as if they were paper documents. Therefore, any electronic files, that fall into one of the document types on the above schedule, will be maintained for the appropriate amount of time. If a user has sufficient reason to keep an email message, the message should be printed in hard copy and kept in the appropriate file or moved to an "archive" computer file folder. Backup and recovery methods will be tested on a regular basis.

Emergency Planning

II's records will be stored in a safe, secure and accessible manner. Documents and financial files that are essential to keeping II operating in an emergency will be backed up at least once every week and maintained off site.

Document Destruction

II's Executive Director is responsible for the ongoing process of identifying its records, which have met the required retention period and overseeing their destruction. Destruction of financial, personnel, and client-related documents will be accomplished by shredding.

Document destruction will be suspended immediately, upon any indication of an official investigation or when a lawsuit is filed or appears imminent. Destruction will be reinstated upon conclusion of the investigation.

Compliance

Failure on the part of employees to follow this policy can result in possible civil and criminal sanctions against II and its employees and possible disciplinary action, up to and including discharge, against responsible individuals. The Executive Director and Finance Committee Chair will periodically review these procedures with legal counsel or II's Certified Public Accountant to ensure that they are in compliance with new or revised regulations.

Quality and Improvement

II uses only evidence based practices. All programming utilizes the principles of applied behavior analysis. Data is continually collected and analyzed to ensure we are meeting and surpassing our goals and objectives or revising procedures to maximize success. Additionally, II annually sends out surveys to our Parents/Guardians, and the agencies we provide services for to get the pulse of what we are doing and what needs to be improved and acting upon that.

 Communication

 **Mail Policy**

All mail/parcels addressed to individuals employed at and acting in their professional capacity at II shall be deemed business mail and as such are the property of II. All business mail received at II will be directed to the appropriate staff person or department. The agency will not be responsible for managing personal mail. If occasional mail is sent and marked personal it will be considered exempt non-business mail and will be forwarded to the individual employee.

Media Relations

The Executive Director, President or their designee is responsible for responding to all media inquiries. Employees are expected to report media contacts from newspapers/print media, television, radio, teletext services and freelance reporters immediately to the Executive Director. Under no circumstances can an employee release information about II, its clients or staff without prior consent from the Executive Director, President or their designee.

Legal Notices

Any and all legal notices inclusive of search warrant(s), subpoenas, and/or demand(s) for information and/or document(s), notice(s) to appear or to discuss information pertaining to II, inclusive but not limited to, its business practices, employees, clients, contractors, board clients, agents, vendors, and clients, are to be immediately directed to the Executive Director, President or their designee. No employee shall accept, respond to, discuss, or in any way represent II without the express written consent of the Executive Director, President or their designee. II employees are not to provide signature as witness to any legal document on behalf of a client, client's family member, relative, if an employee has any questions regarding their ability to sign a document on behalf of a client they should direct them to the finance department.

II User Credentials

An employee's II user credentials are used to log in to II's computers and to access resources (folders, files, printers, wifi, etc.) on II's network. Which of these resources and employees is able to access is determined by their role at II. An employee's user credentials are used to identify the employee and should only be used

by that single individual. Sharing credentials with other staff, students, client, and visitors represents a significant security and privacy issue and is strictly prohibited.

Personal Computer Equipment Acceptable Network Use and Security Policy

II provides access to its wired, wireless, and virtual private networks to employees using their personal laptops as a matter of convenience to its employees. All employees using their personal computer to connect to II's networks must agree to abide by II's Personal Computer Equipment Acceptable Network Use and Security Policy as defined below and will be required to annually sign a document certifying that they comply with these policies:

- The employee must agree to have adequate anti-virus protection installed and enabled on their computer and that any required subscriptions will be renewed as required at the employee's expense to keep the anti-virus protection up to date.
- The employee must agree that his/her personal computer will not have any peer-to-peer File sharing software installed such as, but not limited to; LimeWire, Kazaa, BitTorrent, eDonkey, File•ippo or other similar file sharing software.
- The employee will not use his/her computer to connect to the II network if he/she suspects that his/her personal computer is infected with a virus, spyware, malware, or is otherwise security compromised.
- The employee agrees to only have the II files and client information required for his/her immediate II business needs on the computer and to not keep any historical copies of files which contain personally identifiable information such as, but not limited to; ISP Documents, DHSP Documents, Progress Notes, Step Sheets, Evaluations, or any sensitive information. Instead he/she will transfer any and all such files to the appropriate location on the server as needed and, once transferred, will remove the files from his/her personal computer.
- The employee agrees to notify II immediately if his/her laptop is lost or stolen or if he/she believes that someone may have retrieved any information from his/her laptop that could contain confidential and/or personal information about an II client, staff, or II documentation.
- The employee agrees to not keep illegal or illicit content on his/her personal computer such as, but not limited to; material that is pornographic in nature, software for which he/she does not hold a valid software license, or software whose copy protection has been deliberately circumvented.
- The employee agrees not to share his/her II user name and password with any other person and that he/she will safeguard this information by not keeping written copies on, or near, his/her computer, or in a file on his/her computer where someone might be able to retrieve the information.
- The employee agrees to allow II to create a user account named "II SecurityAccount" on his/her personal computer and that this account may be used for the sole purpose of periodic automated monitoring of his/her computer to ensure it has active and up-to-date antivirus protection and that he/she does not have Peer-to-Peer or other file sharing software installed. The employee agrees not to disable this account while employed at II.
- The employee agrees and understands that failure to comply with any of these requirements will result in his/her personal access privileges being permanently revoked and may result in his/her suspension or termination.
- The employee understands that he/she will be required to renew this agreement annually or at any time these policies are amended or sufficiently modified to warrant renewal.

The purpose of this policy is to ensure that all personal and confidential information is safeguarded and to prevent any security compromised or vulnerable computer from potentially infecting other computers on the II network.

Building Access Control

II issues managing staff keys to the building. Employees are required to carry their on their person at all times during II work hours. Lost or misplaced keys represent a significant security issue that could allow a stranger access to our facilities. As such, employees should report lost/misplaced keys immediately. If the employee has lost their key they will need to purchase a replacement at a cost of \$15.00. Should an individual leave II's employment, they will be required to turn in their key on their day of exit. Failure to do so will result in \$15.00 being deducted from the net amount of their final paycheck or final expense reimbursement.

Intellectual Property

Intellectual Property (IP) is intangible property and can be protected by copyright, patents, trademarks, and design rights. Most of II's IP is protected by copyright; however, other protection may be appropriate depending on the IP in question.


II provides its staff with the facilities, physical supports (computer hardware and software, other office equipment and supplies) and access to research and information dissemination opportunities. As such, copyright vests automatically to II in original written works and original documented research or documented teaching, behavioral, or functional skills programming created for or on behalf of II by its staff. For this reason, any document produced for techal or external distribution must include Copyright (year of publication) Independent Identity, Inc. All Rights. Reserved in the footer.

Staff members who take part in the development and/or presentation of the written materials and/or provide oversight for the research efforts that contribute to the copyrighted property will be identified and documented as contributors and/or creators of the work and can, and are encouraged to, include these works on their resume with the appropriate bibliographical reference identifying all contributors/creators involved in the creation of the content as well as II's copyright notice. However, this identification does not transfer ownership or copyright rights to these works and does not create any additional compensable rights to the staff members while employed at II or once they cease to be employed by II, whether by personal choice or termination, who contribute to and/or are identified as creators on these works.

While creators of and/or contributors to these works have a non-exclusive, royalty-free, perpetual, worldwide, non-transferable license to publish these works elsewhere, provided that such publication is accompanied by disclosure that the work is the copyright property of II and is used with permission, the research and data collected and used in the development of such works cannot be shared or utilized outside of II without written permission by II's President or Executive Director.

Witnessing of Legal Documentation

II employees are not to provide signature as witness to any legal document on behalf of a student, client, student's family member, relative. For any questions regarding the ability to sign a document on behalf of a client should be directed to the Finance Department.

 Should You Leave Independent Identity

✗ Termination of Employment

As explained previously in this document, II employees are employees-at-will meaning that either the employee or II can terminate the employment relationship at any time. However, the following procedures have been established to protect, as much as practical, the interests of both the employee and the firm.

Resignation

In the case of voluntary termination, employees are encouraged to give as much notice as possible. An employee is asked to notify the Executive Director about his/her resignation in writing as soon as possible in order to plan for the consistency of services required by the clients of II's Program. II requests, whenever possible, that at least four weeks' notice be provided by resigning employees. If the resigning employee gives less than two weeks' notice they will not be eligible for rehire. II reserves the right to reduce the time frame in which the employee has given notice (for instance, an employee offers a four week notice of resignation; II deems only two weeks to be necessary). The employee's last day worked is the termination date. An employee must work the day following a holiday program closure or two weeks following a scheduled closure week in order to receive compensation for the holiday and/or schedule closure weeks.

Employees who resign from II will be requested to participate in an exit survey.

Employees who fail to report to work or contact their executive director for three (3) consecutive workdays shall be considered to have abandoned their job without notice, effective at the end of their normal shift on the third day. Employees who are separated due to job abandonment are ineligible for rehire.

Although the company hopes layoffs will not happen, business needs may dictate that a position or positions be changed or eliminated in order to better serve the company's customers or to better manage the company's bottom line.

Termination and PTO (Updated for 2024)

Upon termination of employment, employees will not receive payment for their unused accrued paid time off. Additionally, an employee who terminates employment, having taken PTO time that has not yet been accrued, will have the appropriate wages for the unaccrued PTO time recouped from his / her final paycheck. If the final paycheck was paid and the former employee still owes II for hours not yet accrued, the former employee must pay II back within thirty days of their last day of employment. An employee cannot use paid time off to extend their termination date and must work on their last week of employment. The employee will not accrue PTO time in the month of their termination date.

Disciplinary Action, Suspension and Termination

Certain employee actions violate expected standards of employee behavior and conduct, and include, but are not limited to:

- Theft
- Dishonesty
- Consumption of alcohol or use of illegal drugs on the job or prior to reporting to work, intoxication on the premises, attending to one's duties while intoxicated, abuse of alcohol, illegal drugs or prescription medication and/or arrest for driving under the influence of alcohol or drugs.
- Insubordination
- Abuse or neglect of a client or conduct adversely affecting their physical or mental health
- Unsatisfactory job performance (quality and quantity of work)
- Excessive and continued absenteeism
- Breach of confidentiality
- Fighting or other disruptive behavior
- Employees will not engage in any horseplay, malicious pranks, or profanity
- Possession of a weapon
- Violation of harassment or equal opportunity policies
- Making false allegations against anyone within II, including all forms of social media
- Willful falsification or misrepresentation on employment application or other work records; falsifying reasons for sick or personal leave or other data.
- Criminal or dishonest acts, acts of violence or threats of violence toward anyone on II's premises or when representing II. II takes all threats of violence seriously
- Employee behavior that is in opposition to any/all of II's safety and housekeeping rules
- Any other action deemed not to be in the best interest of II or its clients

Discipline may be imposed, up to and including termination, for any reason of the actions listed above. II reserves the right to issue rules and procedures governing employee conduct at the workplace. II also reserves the right to impose discipline on employees for reasons of performance or misconduct. The basic purpose of discipline is to provide correction so that the employee can improve his or her conduct or performance, unless the company believes that, under the circumstances, the employment relationship should not be continued. In some cases, II will follow a model of progressive discipline, issuing warnings and Corrective Action Plans prior to terminating an employee. However, II may suspend, place on probation, or terminate an employee immediately without prior warnings where serious misconduct such as, but not limited to, abuse or neglect, insubordination, dereliction of duty, possession of alcohol or drugs on II's property occurs, or where the failure to discharge employment duties occurs. Whenever an employee engages in conduct which does or may jeopardize the safety and security of anyone at II, termination may occur. Depending upon the circumstances involved, discipline issued may be a verbal warning, written warning, and suspension with or without pay or discharge.

Progressive discipline may not be followed in all cases. Depending upon the nature and severity of the violation and the surrounding circumstances including, but not limited to, the employees past work record and past conduct, one or more steps of the progressive discipline system may be repeated or skipped. In some circumstances, discharge may be the first step of the discipline procedure.

It is the policy of II to conduct, when practical, personal exit interviews with terminating employees. If a personal interview is not possible, a survey will be used. It is the purpose of this policy to provide an opportunity for communication of information regarding II operations, supervision and general effectiveness of the programs. Information obtained in exit interviews will be evaluated to determine trends, problem areas and organizational strengths in an effort to provide an optimal work environment. Employees that wish to participate in an in-person interview should contact the Executive Director as soon as possible to schedule a time to meet.

Return of Company Property & Personal Possessions

Any company property issued to employees, such as computer equipment, keys, tools, program supplies, parking passes, or company credit cards must be returned to the company at the time of employment separation. The employee is responsible for returning all keys and company property within a reasonable time of his/her departure. Employees may be responsible for any lost or damaged items. Upon separation of employment employees are to remove their personal possessions from all company property.

References

II will only release job related and performance information (e.g., for bank, credit or employment references) with receipt of a signed employee authorization. If signed authorization has not been received, II will verify only job titles and dates of employment. Individuals are welcome to request recommendation letters from their supervisor regarding their specific job skills and scope of teaching/instructing experience but all other references related to an individual's employment at II must go through the Executive Director.

Re-Employment of Former Employees

In the event a former employee seeks to be re-employed at II's Program, the Executive Director or President (or their designee) will review the former employee's personnel records with the relevant program's Program Director or Assistant Program Director to assess performance, evaluations, attendance records and status at the time of termination. The former employee must also provide up-to-date resume for the period of time since the employee left II, including references from the interim employer(s) (if requested).

A recommendation for re-employment must be reviewed and approved by the Executive Director or President and the relevant program's Program Director or Assistant Program Director or their designee, prior to confirmation of employment.

If a former employee is re-employed, the former employee's new anniversary date will be the date of re-employment. If an employee's re-employment date occurs within one year of his/her termination date, he/she will maintain accrual of benefits time based on his/her original employment date less the time between the

termination date and re-employment date. If an employee's re-employment date occurs after one year of his/her termination date, prior employment with II will not factor into the accrual of benefits or other instances which may be affected by seniority.

Direction and Control

II's Emergency Preparedness Coordinator (EPC) will be notified by HHSCs alert system, Alert Media, in the event of an emergency situation. In the event of a bomb threat or natural disaster, emergency alerts and/or advice from local authorities should be followed. If evacuation is recommended, follow evacuation procedures detailed in section the Emergency Procedures section of this manual. The Executive or Clinical Director will retrieve this information from the appropriate authorities and disseminate to staff via walkie-talkies.

Jenna Taylor, Executive Director, is II's Emergency Preparedness Coordinator (EPC) and will manage the response to an emergency. The Clinical Director is the alternate EPC. Eric Carter is the Chief Emergency Management Coordinator for Travis County.

EPCs will ensure the health and medical needs of all clients are addressed by ensuring training and compliance with the following emergency procedures below.

Cancellations, Emergency Closings, Early Dismissal and Delayed Opening

If II's Adult Program is to be closed or delayed due to inclement weather it will be posted on II's website at www.Independentidentity.org, on the Facebook and Instagram pages, and via email. II follows inclement weather closures of Austin ISD.

Staff should assume the program will still remain open unless otherwise communicated. In the event that II cancels or delays school, a text message will be sent to all staff, guardian and parents.

In the event II's program must be closed, dismissed early or our opening delayed for reasons other than weather, all guardians or residences will receive a telephone call as soon as the decision is made to close, dismiss early, or delay opening. For example, if we lost power or water in our building or if there was some other building related emergency, it might be necessary for us to close until the situation is rectified.

If a client must be picked up at our facility, we will request that the transportation company, residence staff or guardian pick up the client as quickly as possible. If they cannot, we will contact the other names provided on the emergency information card. Staff are required to remain with clients until they are picked up.

If we must close II on an emergency basis for more than one week, and, if the reasons for closing do not preclude our staff working in another location, we will work to find a temporary location where staff can provide training and instruction to clients while the closing is in effect.

II's Emergency Preparedness Coordinator (EPC) will be notified by the state emergency alert system, Blackboard, in the event of an emergency situation. In the event of a bomb threat or natural disaster,

emergency alerts and/or advice from local authorities should be followed. If evacuation is recommended, follow evacuation procedures detailed in section the Emergency Procedures section of this manual. The Program Director or Administrator will retrieve this information from the appropriate authorities and disseminate to staff via walkie-talkies.

Evacuation Procedures

The following procedures are to be followed in the case of an emergency resulting in the need for all staff and clients to evacuate the building including fire or any situation where the local authorities have recommended evacuation:

1. All staff should familiarize themselves with the "Evacuation Procedures" diagram posted on the inside wall by the door of each programming room.
2. Each staff member scheduled with a program client(s) at the time of the evacuation is responsible for ensuring the evacuation of that/those client(s) assigned to him/her.
3. Staff members and their assigned client(s), proceed calmly but quickly to the nearest exit as shown on the "Evacuation Procedures" diagram in the room the staff client is in.
4. The last staff person leaving a room will close the door and turn off the light to indicate that the room has been emptied.
5. Once out of the building, all staff and clients are to proceed to the "meet area" which is Daisy's Day Hab located at suite F20
6. Once at the meet area, each group leader or his/her designee will take attendance to ensure all staff and clients from his/her group are accounted for.
7. The Executive Director or her designee will conduct a final sweep of the space and wait for emergency personnel in the front of the building.
8. Clinical directors will radio to Executive Directors to confirm that all staff and clients are out of the building and accounted for.

If relocation is required:

The following procedures are to be followed in the case of an emergency resulting in the need for all staff and clients to evacuate the building AND the area:

1. Follow above procedures 1 through 4 for evacuating the building.
2. Once out of the building, all staff are to get their clients and go to the park and meet under the cement shaded area.
3. Once at the park, the group leader for each group, or his/her designee if not in attendance, will take staff and client attendance for his/her group upon arrival at the church.
4. The Executive Director, or his/her designee(s) will conduct a final sweep of the Program space and the parking lot outside to ensure that everyone has left the area before leaving to go to the relocation meet area.
5. Once at the relocation meet area the Group Leaders will report their Group's attendance to the Executive Director and the Director will complete attendance to ensure all other staff are at the relocation meet area

Shelter In Place Procedures

Sheltering in Place is defined as the process of staying put and taking shelter, rather than trying to evacuate in an emergency situation. This action is recommended to protect people by keeping them inside a building.

The following situations may call for sheltering in place:

- Severe storms, such as tornados or hurricanes;
- Extreme life threatening temperatures (*e.g.*, cold or heat);
- A public disturbance, such as a demonstration that has escalated to a violent level;
- Explosives, whether intentional or accidental;
- Chemical or biological contaminants released accidentally or intentionally into the air;
- Or any situation where the local authorities have recommended evacuation.

The following procedures are to be followed in the case of an emergency resulting in the need for all staff and clients to shelter in place:

- Staff and clients should move indoors immediately.
- If you are told there is danger of explosion, close the window shades, blinds or curtains.
- Get your disaster supplies kit and make sure the radio is working. Ensure you have your cell phone and walkie-talkie.
- Take everyone into an interior room with no or few windows and shut the door. At Independent Identity program this could be the restrooms or break room.
- Call 911 if necessary and keep your phone handy in case you need to report a life-threatening condition. Otherwise stay off the phone, so that the lines will be available for use by emergency responders.
- Keep listening to your radio or television until you are told all is safe or you are told to evacuate. Do not evacuate unless instructed to do so.
- When you are told that the emergency is over, open windows and doors and follow any special instructions given by emergency authorities or supervisors.

Posted Emergency Numbers and Emergency Procedures

A list of Emergency Numbers is posted near the entrance, in the each room of the program and includes the following emergency procedures to be followed in the case of a general medical emergency:

"In the event of an emergency, the Group Leader in the room stays with the client, calling out for help and directs someone to **Call 911**. The behavior techs in the room will call for the Program Director and/or Administrator to come and assist with the emergency and then remove all other clients in their care from the room. The staff person speaking with the 911 operator will immediately provide their name, address, telephone number, nature of injury, and where the injured party is located in the building. The Program Director or Administrator will wait at the door for the emergency personnel to bring them to the location of the emergency."

All staff are required to be first aid and CPR/AED certified. If not certified when they begin their employment, II will conduct the certification training required usually within their first three (3) months of employment (but no longer than 6 months).

Staff will familiarize themselves with

- ○ Executive and Clinical Directors' offices: Extinguisher and First Aid kits are located between the Executive Director and Clinical Director's Office on the wall.
- Dayroom: Extinguisher and First Aid kits are located between the Executive Director and Clinical Director's Office on the wall.
- Cafeteria: Extinguisher and First Aid kits are located on the wall behind the door.
- Foyer/Vocational Room: Extinguisher and First Aid kits are located beside the client lockers.
- Living Skills Room: Extinguisher and First Aid kits are located behind the door on the wall.
- Restroom: Extinguisher and First Aid kits are located between the exterior restroom doors on the wall.
- Behavior Technician Office: Extinguisher and First Aid kits are located on the far wall in the corner.

Community Outings

A critical component of Independent Identity's programming is providing our clients with opportunities to 1. productively engage with people in the community, and 2. Practice skills at various locations within the community. Each month, as appropriate for the client, opportunities are provided to engage in the following activities in the community:

- Banking;
- Grocery shopping;
- Lunch, at a restaurant or via drive-through;
- Recreation and leisure activities;
- Volunteer and/or work activities.

Groups take part in community activities together. At no *time* will there be less than two (2) staff in the community with a group of clients. Staff have the following while in the community:

- A portable first aid bag travels with 1 staff who is in the group
- Staff will have their cell phones in their possession with ringer on and on at all times while in the community
- Each staff member wears a tear away lanyard identifying them as an employee of II
- Each staff has business cards on their person that they can provide to individuals in the community if any issues arise
- For each client in the group the staff bring a folder with each client's emergency information, permission to seek medical assistance and a photo

New clients will not take part in community activities for approximately the first two (2) weeks after they have begun at the program. This provides staff with a time period to get to know the client and acquire a base line of and, if necessary, a plan for, any behaviors that may prevent or disrupt a client's ability to safely and productively take part in activities in the community. This period of time may be extended for more than two (2) weeks if it is determined that the client has a behavior(s) that would be considered unsafe or materially disruptive to others in the community. In this case, this behavior(s) are addressed in a more comprehensive

behavior plan and criteria are established for determination of when the client will be able to safely take part in community activities.

Transportation Safety

As noted above, groups take part in community activities together. II's Program uses the city of Austin Cap Metro for its community outings. There will be two (2) or more staff transporting the clients at all times, except in the following cases:

- A client needs to be transported to their worksite and has the prior approval of the Executive Director to be in a vehicle alone with their 1:1 job coach;
- Two (2) clients (neither of whom is funded as a 1:1) need to be transported to their worksite or a community outing and has the prior approval of the Program Director to be in a vehicle with just one staff client.

Staff will always adhere to the following when transporting clients, whether while using Cap Metro or a personal vehicle:

- Clients will be safely and securely fastened, if possible, in a seat belt or other secure device if the client requires, and has authorization for, something else (ie. Buckle boss, harness — as approved by the guardian);
- Clients will NEVER be left unattended while in a vehicle.

In the case of a mechanical breakdown:

1. One staff member will use their cellular phone to call the program and inform the Program Director or Administrator of their situation, location, and if there are any issues with any of the clients.
2. If required, another staff member will go to the location to retrieve one (1) staff and any client(s) who is having difficulty waiting.

In the case of an accident:

1. Staff will first ensure that all clients in the vehicle or car are not injured.
2. A staff member will use their cellular phone first to call emergency personnel if required and then to call the program and inform the Program Director or Administrator of their situation and location.
3. The Program Administrator (or designee) will go to the accident scene to assist with emergency personnel and paperwork. He/she can then retrieve and coordinate the return of other staff and clients to the program.
4. Once back at the program, all clients and staff will be spot checked by the Executive Director before returning to their other daily activities.

Missing Client Elopement and Search Procedures

It is important for each employee with clients(s) assigned to him/her to always be clear about which client(s) they are assigned to and the whereabouts of each of those client(s). However, in a situation occurs where a client is believed to be missing, the following procedures will be followed.

While On-Site at the Program Space

If no other staff are in the room:

The staff member should call the Executive Director and inform him/her that they are unable to locate a client, the client's name, and that they are alone in the room.

- If no other clients are assigned to the staff member at that time, immediately start searching in the building and the Executive Director will begin searching outside of the building starting with the perimeter of the building and working out to the street.
- If other clients are also assigned to the staff client, the Executive Director will begin the search inside the building and will secure another staff member to begin the search outside of the building.

If there is one or more other staff in the room:

The staff member should call the Executive Director and inform him/her that they are unable to locate a client and provide the client's name

- If no other clients are assigned to the staff member at that time, immediately start searching in the building and the Executive Director will begin searching outside of the building starting with the perimeter of the building and working out to the street.
- If other clients are also assigned to the staff member, the employee should inform the other staff member(s) in the room that they are beginning a search and that they are transitioning responsibility for the other client(s) in their care to that other staff member(s). Then immediately begin searching the building and instruct the Executive Director to begin searching the outside of the building starting with the perimeter of the building and working out to the street.

In any of the above scenarios be sure the personnel search both inside and outside of the building have cell phones with them to communicate once the client is located. If the client is not located within five (5) minutes of beginning the search, the Executive Director will call the local police. As soon as the police arrive, the Executive Director will provide a photo of the client to police and an explanation of the client's disability and methods of communication. Police will undertake a search in their cruisers, accompanied by an II staff member if possible.

While Out in the Community

In a store, restaurant, or other enclosed environment:

The staff person assigned to the client will immediately notify a manager or security in the business to lock down the facility and assist in the search for the client including directing at least one (1) individual to search the perimeter of the facility outside.

In an open area within the community:

The staff person assigned to the client will transition any other client(s) assigned to him/her to one of the other II staff present and will begin searching the immediate area.

In either of the above scenarios, if the client is not located within two (2) minutes of beginning the search, the staff member is to call local police and the Executive Director to come to the area and assist in the search. As

soon as the police arrive, the staff person or Executive Director (if there) will provide a photo of the client to the police and an explanation of the client's disability and methods of communication. Police will undertake a search in their cruisers, accompanied by an II staff member if possible.

Incident and Accident Reporting

In the event of an incident or accident that occurs on the property of Independent Identity and/or within program hours, II staff monitoring client involved will notify the Supervisor that an incident/accident has occurred, The Executive Director and the staff member will document the details and assessment completed on the appropriate incident/accident report forms.

All client related incidents and/or accidents shall be documented. Client's guardians and residences will be notified by the group leader or executive director of detailed assessment and plan for treatment. In the event of an incident/accident that requires emergency medical treatment, the client will be transported to the nearest emergency room via ambulance and notification of incident to guardian/residence will be done promptly. All medical documentation will be completed by hospital staff. If a client is referred to an outside provider for medical treatment for emergent care due to an incident or accident a note to return to the program must be signed and dated by physician in order for the client to return safely to the program and received proper medical care with parameters advised by physician.

Independent Identity must report incidents to HHSC's complaint and incident Intake Section within one hour of learning of the incident for clients utilizing ISS services.

In the event that an employee becomes injured or witnesses an injury during working hours, they must report it immediately to the nearest available supervisor or manager. Employees are to render any assistance requested by supervisor, or manager. Questions asked by law enforcement or fire officials making an investigative report should be answered giving only factual information and avoiding speculation. Liability for personal injury or property damage should never be admitted in answering an investigatory question asked by law enforcement or fire officials.

When any accident or injury occurs while an employee is at work, the employee must obtain an injury reporting form and complete and return the form to a supervisor as soon as possible. Reporting should not be allowed to delay necessary medical attention. Once the accident is reported, follow-up will be handled by the Clinical Director or the supervisor.

In addition to compliance with safety measures imposed by federal Occupational Safety and Health Act (OSHA) and state law, the company has an independent interest in making its facilities a safe and healthy place to work. The company recognizes that employees may be in a position to notice dangerous conditions and/or practices and therefore encourages employees to report such conditions, as well as all non-functioning or hazardous equipment, to a supervisor or manager immediately. Appropriate remedial measures will be taken when possible and appropriate.