

Employee Handbook Addendum
September 17, 2019

Notification of Incident Process

The following information should be included as part of all incident reporting training and is added to the Incident Reporting process located on pages 48-51 of this handbook.

Ark shall report the following categories of critical incidents involving people we support to the Division, the Department of Family Services, Protection & Advocacy, the case manager, any legally authorized representative(s), and to law enforcement immediately after assuring the health and safety of the participant and other individuals:

- Suspected abuse
- Suspected self-abuse
- Suspected neglect
- Suspected self-neglect
- Suspected abandonment
- Suspected exploitation
- Suspected intimidation
- Sexual abuse
- Death

Ark shall report the following non-critical incidents to the Division, Protection & Advocacy, the case manager, and any legally authorized representative(s) within one (1) business day:

- Police involvement, such as arrests or questioning of the person by law enforcement
- Any use of restraint
- Any use of seclusion
- Injuries caused by restraints
- Serious injury to the participant
- Elopement
- Medication errors
- Medical or behavioral admission
- Emergency room or urgent care visits

Medication error reports that do not result in emergency medical attention shall be filed no later than three (3) business days after the event is discovered



Ark Regional Services



Employee Handbook

2018

IMPORTANT NOTICE

THIS HANDBOOK IS INTENDED AS A GUIDE FOR THE EMPLOYEE TO PERFORM THEIR JOB IN AN EFFICIENT AND PROFESSIONAL MANNER. NOTHING IN THIS HANDBOOK SHALL BE CONSTRUED TO BE A CONTRACT BETWEEN ARK REGIONAL SERVICES OR ITS RELATED ORGANIZATIONS AND THE EMPLOYEE. ADDITIONALLY, THIS HANDBOOK IS NOT TO BE CONSTRUED BY ANY EMPLOYEE AS CONTAINING BINDING TERMS AND CONDITIONS OF EMPLOYMENT. REGARDLESS OF WHAT THESE POLICIES SAY OR PROVIDE, THE EMPLOYER PROMISES NOTHING AND REMAINS FREE TO CHANGE ITS POLICIES, WAGES, AND ALL WORKING CONDITIONS WITHOUT HAVING TO CONSULT ANYONE AND WITHOUT ANYONE'S AGREEMENT, WITH OR WITHOUT NOTICE, IN WRITING OR OTHERWISE.

ALL EMPLOYEES ARE AT WILL EMPLOYEES. ARK RETAINS THE ABSOLUTE RIGHT TO TERMINATE ANY EMPLOYEE AT ANY TIME, WITH OR WITHOUT CAUSE. IN THE SAME REGARD, AN EMPLOYEE MAY TERMINATE HIS EMPLOYMENT WITH ARK AT ANY TIME, WITH OR WITHOUT NOTICE OR WITH OR WITHOUT CAUSE.

NO EMPLOYEE, SUPERVISOR, OR MANAGER OF ARK, OTHER THAN THE PRESIDENT AND CEO, HAS THE AUTHORITY TO MAKE ANY PROMISE OR STATEMENT INDICATING THAT ANY EMPLOYEE IS EMPLOYED FOR ANY DEFINITE PERIOD OF TIME OR ANY STATEMENT OR PROMISE WHICH CONTRADICTS THE PROVISIONS OF THIS DISCLAIMER. ANY SUCH PROMISE OR STATEMENT MADE BY THE PRESIDENT AND CEO MUST BE IN WRITING AND SIGNED BY THE PRESIDENT AND CEO AND THE EMPLOYEE TO BE ENFORCEABLE.

QUESTIONS REGARDING THIS POLICY SHOULD BE DIRECTED TO THE PRESIDENT AND CEO OR THE HUMAN RESOURCES DEPARTMENT.

Table of Contents

Important Notice

Who We Are and What We Believe

Preface	2
Management Rights	2
Vision	2
Mission	2
Value Statement	2
Ethical Code Of Conduct	3
Organizational Chart	4
Contact List	5

Getting A Job

Equal Employment Opportunities	7
People With Disabilities	7
Staffing Patterns	7
Job Openings	8
Background Checks	8
Authorization To Drive	8
Personnel Files	9
Part-Time Employment	9
Full-Time Employment	9

Welcome Aboard

Job Descriptions	11
ID Badges	11
Employee Dress and Chemical Sensitivities	11
Employee Check In/Out	12
Time clock	12
Attendance	13
Keys	13

Tests and Training

Tuberculosis Testing	15
Staff Development and Training	15
Drugs and Alcohol	16

Safety Is No Accident

Employee Safety	18
Snow Days and Unplanned Closure Of Facilities	18
Transmission of Communicable Diseases	18
Violence Prevention Policy	19
Dangerous Weapons Policy	19
Worker's Compensation	19

Your Bottom Line

Compensation For Employees	21
Overtime Compensation	21
Direct Deposits	21
Benefit Program	21
Health Insurance Continuation Coverage	22
Holidays	22
Personal Leave	22
Court Leave	23
Educational Leave	23

Military Leave	24
Voting Leave	24
Leave Without Pay	24

Odds and Ends

Donations and Fundraising	26
Mail	26
Petty Cash	26
Purchase Orders	26
Requests For Repair	27
Vehicle Use	27
Visitors	28
Out Of Town Travel	28
Telephone Solicitations	29
Email and SComm	29
Employee Handbook Revisions	29
Surveys, Reviews, and Inspections	29

Legal Matters

False Claims & False Claims Recovery	32
Contract For Outside Service	34
Employee References	34
Policy Prohibiting Retaliation	35
Harassment	35
Workplace Monitoring Policy	37
Policy Regarding Legal Proceedings	37
Use Of Organizational Resources	38
Tobacco and Vaping Policy	38
Nepotism Policy	38
Public Relations Activities	38
Volunteers, Interns, & Special Guests	39
Cell Phone Use and e-signatures	39
Blogging & Social Media Policy	40
Technology Policy	41
Animals & Pets At Work	41
Disciplinary Action	41
The Family and Medical Leave Act	43

The Reason We're Here

Policy On Rights Of Persons Served	47
On-Call Process	47
Client Handbook	48
Human Rights Committee	48
Incident Reporting	48
Use of Seclusion or Coercion	51
Restraint Policy and Procedure	52
Clinical Holding Policy	54
Shopping With People Served	55
Unattended Death	57
Notifying Persons Served Of A Death	57

Who We Are and What We Believe

Preface
Management Rights
Ethical Code Of Conduct
Vision
Mission
Value Statement
Ethical Code Of Conduct
Organizational Chart & Chain of Command
Contact List



Preface

For the sake of simplicity, the term "Ark" will be used throughout the policy manual as it relates to Ark Regional Services and its associated divisions. It should also be noted that Ark is not an agency-affiliated member of the ARC of the United States. Terms (i.e. her, his, hers, or him) will be used interchangeably throughout the employee handbook as gender-neutral.

The policies and provisions contained in this handbook apply to all employees, unless otherwise indicated in a particular policy or provision.

The policies and provisions contained in this handbook apply to all employees, unless otherwise indicated in a particular policy or provision.

Management Rights

Only the President and CEO or his designated representative has the authority to make any changes or exceptions in Ark policies or procedures.

Ark is continually looking for ways to improve the services provided to the people we serve. In order to accomplish this, Ark retains all rights to manage, direct, and control its business and, as such, has the right to plan, manage, direct, and control the work of employees. Inclusive in this right is the right to hire; the right to determine the size, structure, and makeup of the work force; the right to establish hours of work; the right to assign job tasks; the right to establish personnel, pay, and benefits systems; the right to evaluate work performance; the right to establish work rules and standards; and the

right to discipline and terminate employees. Only the President and CEO or his designated representative has the authority to make any changes or exceptions in Ark policies or procedures. In addition, the President and CEO or his designated agent or representative may terminate or reassign any employee and may change any employee's status from full time to part time, for any reason, with or without cause, as management deems necessary or proper, with or without notice.

Vision

The vision of Ark Regional Services is that all people have the opportunity to experience the world in which we all live.

Mission

In order to support this vision, Ark Regional Services will facilitate opportunities for people:

- to *LIVE* enriched, full and individualized lives;
- to *LEARN* what is necessary and meaningful to realize personal success;
- to *WORK* toward individual accomplishment, employment satisfaction and community contribution;
- and to *PLAY*...

Value Statement

The values of Ark Regional Services guide every decision made in supporting people with intellectual disabilities to live, learn, work, and play. These values are at the core of what we believe, and in turn how we behave. They are intended to provide the basis for which we all assure accountability to one another.

**We Value:
All People
A Strong Organization
Respect
Integrity
Commitment to Community**

We Value: All People, A Strong Organization, Respect, Integrity, and Commitment to Community.

To view the full Value Statement, visit our website at www.arkregionalservices.org.

Ark Regional Services Ethical Code of Conduct

Leadership, employees, and volunteers associated with Ark Regional Services shall:

1. Foster the vision, mission, and values of the organization, and promote the fulfillment of its goals.
2. Treat all people, most importantly those individuals receiving services, with respect and dignity.
3. Provide or facilitate services designed to meet the needs of the individual with emphasis on promoting choice, inclusion, growth, and development.
4. Develop and maintain relationships that are respectful, based on mutual trust, and maintain professional boundaries.
5. Be vigilant and honor the integrity of Ark Regional Services.
6. Follow all organizational policies, including those located in our Employee Handbook and Client Handbook.
7. Conduct Ark business in accordance with all applicable laws, regulations, and its Value Statement.
8. Honor professional responsibility over personal interest and disclose financial, business, or personal concerns that may constitute a conflict of interest.
9. Refrain from entering into any contractual relationship with Ark Regional Services without first declaring a conflict of interest and requesting that Ark obtain bids or collect other data necessary to ensure the relationship is in the best interest of the organization.
10. Represent Ark Regional Services honestly and fairly at all times.
11. Hold in confidence any information of people receiving services or privileged administrative information learned in the course of association with Ark Regional Services.
12. Commit to the provision of high quality services.
13. Use the resources of Ark Regional Services in a responsible manner and not for personal activities beyond what is allowed by the policies and procedures of the organization.
14. Ensure commitment to the need to prevent and detect fraud, waste, abuse, and fiscal mismanagement and misappropriation of organizational funds.
15. Disclose any breach of ethics to the appropriate level of administration, whether the breach is one's own or on the part of someone else.



The President and CEO will address breaches of this ethical code of conduct within 10 days of a reported violation. Ark Regional Services prohibits retaliation against anyone making a good faith report of alleged wrongdoing.

Organizational Chart and Chain of Command

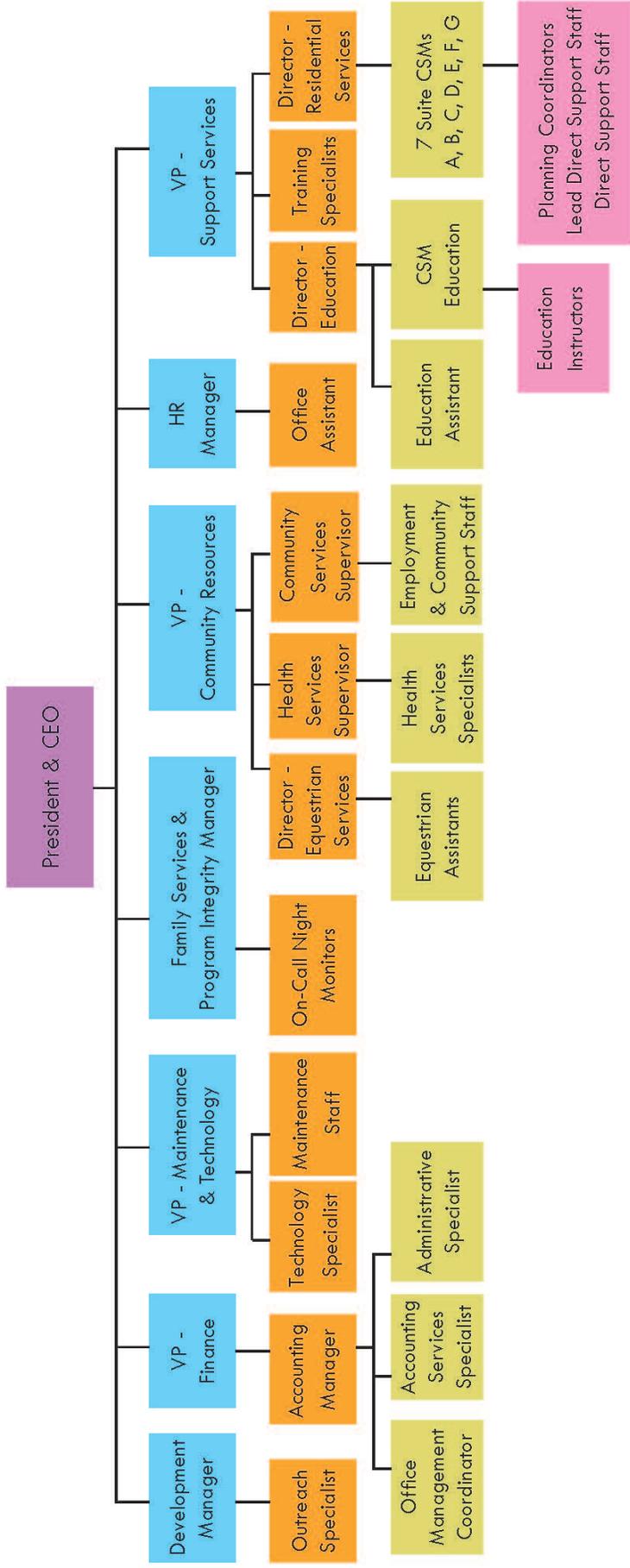
Except as otherwise permitted by other policies, (such as the Policy Prohibiting Retaliation, the Equal Employment Opportunity, and Policy Prohibiting Harassment) all employees should follow the chain of command when addressing work issues or questions regarding organizational policies and procedures.

An employee should always report to and work with his immediate supervisor. However, if the immediate supervisor is unavailable or if there are concerns that are not addressed, refer to the chain of command listed below:

1. Employee's supervisor's supervisor
2. Vice Presidents
3. President and CEO

All supervisory employees, including the President and CEO, have an open door policy. This means that any employee can meet with his immediate supervisor and make suggestions, voice concerns, or problem-solve.

Ark Regional Services Organizational Chart



Contact List

LEADERSHIP TEAM

President and CEO - Bob Sell	bob@arkrs.org	307-760-2098
Vice President - Support Services - Kayc DeMaranville	kayc@arkrs.org	307-460-8917
Vice President - Community Resources - Ami Egge	ami@arkrs.org	307-760-0178
Vice President - Finance - LeRoy Martin	leroy@arkrs.org	307-760-8684
Vice President - Maintenance and Technology - Tim Pratt	tim@arkrs.org	307-760-2881
Program Integrity Manager - Angela Mosley	angela@arkrs.org	307-742-6641 ext. 150

ADDITIONAL CONTACT INFORMATION

Safety Officer, HIPAA & Privacy Officer, and Corporate Compliance Officer - Angela Mosley	angela@arkrs.org	307-742-6641 ext. 150
Human Resources Manager - Mandy McMichael	hr@arkrs.org	307-742-6641 ext. 148
Client Accounting Specialist - Donna Collins	clientacct@arkrs.org	307-742-6641 ext. 170
Development Manager - Mindy Krause-Hoopes	mindy@arkrs.org	307-742-6641 ext. 138

Residential On-Call Number 307-760-0822
Maintenance On-Call Number 307-760-5767



We facilitate opportunities for people with acquired brain injuries and developmental/intellectual disabilities to live, learn, work, and play in an integrated and enriched community environment. We appreciate and celebrate the uniqueness of each individual – who they are, how they want to live their lives, and what they want to become. Because people have individual needs and levels of ability, there cannot be a “one size fits all” approach to supporting them. We provide people with the support they need and facilitate opportunities for them to be involved in the things that are important to them. As part of the philosophy we live every day, we always stay focused on the person and ensure dignity, respect, and choice

Getting A Job

Equal Employment Opportunities
People With Disabilities
Staffing Patterns
Job Openings
Background Checks
Authorization To Drive
Personnel Files
Part-Time Employment
Full-Time Employment



Equal Employment Opportunities

Equal employment opportunities shall be provided to all employees in the administration of all personnel practices including, but not limited to, recruitment, appointments, promotions, discipline, retention, training and other benefits, and terms and conditions of employment in a manner which does not discriminate on the basis of race, color, gender, religion, national origin, age, disability status, genetic information, military service, or veteran status.

An employee who believes she has been subject to discrimination on the basis of one of the characteristics described above should immediately report the circumstances to her immediate supervisor. If the employee is not satisfied with the response, or if she is reluctant to discuss the problem with the immediate supervisor, the employee should notify the President and CEO or the Human Resources Manager. Supervisors who become aware of any action or condition that might violate this policy must notify the President and CEO. All reports will be investigated promptly and as confidentially as possible consistent with the need to conduct a thorough investigation. Appropriate corrective action will be taken for violations of this policy.

People with Disabilities

Employment decisions shall be made in a manner which ensures that discrimination based on disability does not occur. Such decisions may not limit, segregate, or classify an applicant or employee on the basis of disability in a way that would adversely affect his opportunities or status. Equal employment opportunities must be available to people physically and mentally qualified to perform the essential functions of a job.

At the time of hire, an employee who wishes to request an accommodation due to a physical or mental disability should first make the request to the Human Resources Manager. If such a request is not made at the time of hire, an employee who wishes such an accommodation should then make the request to his immediate supervisor. An employee should also feel free to take requests for accommodation directly to the President and CEO if the employee's supervisor has not responded to the employee's request for accommodation within a reasonable time, or the employee feels that the response has been inadequate or inconsistent with Ark's legal obligations. When a request for accommodation is made, Ark may ask the employee for additional documentation of the disability, and may explore alternatives for identifying a reasonable accommodation that enables the employee to perform the essential functions of their position. In addition, Ark may request that the employee ask their health care providers for additional information or input in this process.

Staffing Patterns

Staffing patterns are first and foremost determined by the needs of the people receiving support from Ark Regional Services. In general, staffing patterns will be based primarily on the supervision needs established by the ICAP and Plan of Care. The health and safety of the people Ark supports is paramount, but independence, typical experiences, effective learning environments, sensory input, overcrowding, etc. will also be taken into consideration when determining staffing patterns. It is expected that individual supervisors will adjust established staffing patterns to account for increased or decreased needs of people receiving services while assuring that medication assistance is practiced, medical needs are monitored, that all activities of daily living are completed, that goal attainment is being achieved, that people are able to do the things that they enjoy with friends of their choosing, and that they are able to stay home due to illness.

During daytime hours, all employees are expected to be available to assist in the event that they are needed for personal care needs, crisis, transportation, etc.

Supervisors will use the ADP platform to determine scheduling in the area(s) for which they are responsible and will maintain each month's schedule for a period of not less than one year for the purpose of verifying who worked, where they worked, and for how long. Any changes that occur to an established staffing pattern, (someone is sick, on vacation, etc.) must also be entered in ADP for verification purposes.

Supervisors will ensure that all employees have necessary training and background checks prior to scheduling people to work alone. Staffing patterns are adjusted accordingly during absences associated with clients visiting family over holidays to ensure those staying at home are able to celebrate as they choose.

Job Openings

Job vacancies are posted in the reception area of the administration building and on Ark's website. Ark only accepts employment applications for authorized vacant jobs. Current employees who wish to apply for a different job with Ark are required to complete a new application with current job information. Applications for jobs that require continual recruitment may remain on file with Ark for a period not to exceed 60 days.



Resumes will be accepted at the discretion of the President and CEO for hard to recruit or professional positions and will remain on file with human resources for one year.

Previous employment history, driving record, employment credentials, and other relevant information will be verified by human resources for applicants as deemed necessary.

Notice of employment by Ark is officially made in writing by the President and CEO or his designated representative.

Background Checks

New employees of Ark are required to undergo a background check, which includes fingerprinting. The Human Resources Department will verify the employee's criminal record and other records deemed necessary. Costs associated with such investigations will be incurred by Ark. While a criminal conviction will not necessarily disqualify an applicant, if the background check reveals information which is inconsistent with the rules and regulations of the Behavioral Health Division of the Wyoming Department of Health, inconsistent with Ark's job-related requirements, or reveals that the applicant has given false or incomplete information, the employment relationship may be immediately terminated. In some instances, Ark may request information to run a preliminary background check prior to offering employment.

New employees of Ark are required to undergo a background check, which includes fingerprinting. New employees cannot work alone until a clear background check has been obtained.

New employees cannot work alone until a clear background check has been obtained.

Ark shall run additional background checks of an employee during employment should we become aware of issues that could potentially disqualify the employee from being eligible to provide waiver services.

Authorization to Drive

Ark Regional Services must adhere to strict guidelines regarding driving eligibility requirements for employees. As part of the employee's background check, his driving record will be checked to ensure that driving eligibility requirements are met. If he receives a traffic violation after he is hired, he must notify human resources within five days. Human resources will then verify that he is still eligible to drive according to insurance guidelines. If an employee is no longer eligible to drive, he may be transferred to another position or employment may be terminated. Driving records will be reviewed annually.

Personnel Files

The Human Resources Department maintains a personnel file on each employee of Ark Regional Services. Any employee concerned may review his file, at a reasonable time, upon request to the President and CEO. However, personnel files are the property of Ark, and copies of the contents of the file will be released only at the discretion of Ark or as required by law.

Part-Time Employment

Part-time employment shall be defined as any position that is budgeted as part time and typically involves scheduled work of less than 40 hours per week. The rate of pay for part-time positions shall be determined by the requirement of the position and shall be expressed on an hourly basis. In any case, the hourly rate shall not be less than the current federal minimum wage.

A part-time employee is eligible for personal leave and for retirement if he is scheduled to work 25 hours or more per week, but he is not eligible for paid holidays. For information on health insurance eligibility please contact the Human Resources Manager.

A part-time employee is eligible for personal leave and for retirement if he is scheduled to work 25 hours or more per week, but he is not eligible for paid holidays. For information on health insurance eligibility please contact the Human Resources Coordinator.

Full-Time Employment

Full-time employment shall be defined as any position budgeted as full time and typically involves scheduled work of 40 hours per week. The rate of pay for full-time positions shall be determined by the requirement of the position and shall be expressed on a monthly or hourly basis. In any case, the rate shall not be less than the current federal minimum wage.

A full-time employee is eligible for such benefits as health insurance, retirement, holiday pay, and personal leave. Eligibility and participation in Ark's health insurance and retirement benefits are governed by plan documents, which are available from Human Resources.

Full-time employees are expected to give their full time effort to the performance of their Ark job duties, and many full-time positions require employees to be available weekends and evenings. As a result, Ark strongly discourages full-time employees from holding any other employment. If a full-time employee chooses to hold secondary employment, Ark reserves the right to determine, at any time and at Ark's discretion, that the secondary employment interferes with the performance of his Ark position, and to terminate Ark's relationship with the employee or give the employee the option of terminating the secondary employment as a condition of maintaining employment with Ark.



Welcome Aboard

Job Descriptions
ID Badges
Employee Dress and Chemical Sensitivities
Employee Check In/Out
ADP Time Recording System
Attendance
Keys



Job Descriptions

A job description listing essential functions, current duties and responsibilities, and supervisory relationships for each job within Ark is maintained. Annually, an employee and her immediate supervisor will review the job description as a means to evaluate employee performance and to ensure appropriateness of the job description. An employee's job description is available to the employee or the employee's supervisor upon request from the Human Resources Department.

ID Badges

An employee is required to have an official Ark ID badge available while working in Ark facilities or when performing official Ark business. ID badges are issued by the Human Resources Department. If an ID Badge is lost, it is important to notify human resources as soon as possible. When an employee terminates employment with Ark, ID badges are to be returned to the Human Resources Manager.

An employee is required to have an official Ark ID badge available while working in Ark facilities or when performing official Ark business.

Employee Dress and Chemical Sensitivities

Every employee of Ark Regional Services is a role model for the people receiving support; therefore, it is important to be dressed in a manner that demonstrates the importance of appropriate dress and personal hygiene. Each employee is expected to come to work looking neat and clean and should be dressed in good taste and appropriately for her job or any company sponsored event. Every employee should also be dressed for all types of situations that may occur during the day and in a manner that is appropriate when having interactions with parents, guests, and other members of the community.

An employee must be mindful of how she will be supporting people throughout the day. If an employee is helping a client clean his room, then shorts may be appropriate. If an employee is assisting a client at a doctor's appointment, or assisting them at their job, then jeans or business casual is appropriate.

Inappropriate casual attire includes spandex, halter tops, tank tops or tops with spaghetti straps, low-cut, midriff and/or suggestive t-shirts, particularly t-shirts that are of a sexual or demeaning nature. Low rise jeans/shorts that prevent modesty are not acceptable. Administrative, employment, and education employees are not allowed to wear shorts of any kind. Residential and Supported Living employees are allowed to wear shorts, no more than 2" above the knee in length and only if they are appropriate for the tasks and activities being completed that day. However, cut-offs, athletic or running shorts, cycling shorts, or other shorts deemed inappropriate by a supervisor are not allowed. Casual dresses and skirts, and skirts that are split at or below the knee are acceptable if they are appropriate for the tasks and activities being completed that day. Dress and skirt length should be no more than 2" above the knee.



An employee with tattoos may be asked to cover them if they display offensive slogans, pictures, or language. Body piercings and related jewelry should be kept to a minimum to promote a professional appearance and to reduce health and safety concerns such as being pulled or grabbed.

An employee is expected to use good judgment in selecting appropriate clothing, and present herself in an appropriate manner, remembering that she is a role model for the clients and other

employees, and a representative of the organization. That being said, management reserves the right to determine the appropriateness of clothing, tattoos, and body piercings as it relates to this policy.



Employees are also reminded that some clients and employees have chemical/odor sensitivities to tobacco smoke, perfumes, colognes, and candles. It is important that employees be considerate of these sensitivities and limit or omit the use of potentially offensive products.

Employee Check In/Out

It is the responsibility of all employees listed on the electronic In / Out Board to keep their status updated throughout the day. When an employee is unavailable, the receptionist will route messages and inquiries to the appropriate personnel.

ADP Time Recording System

Employees designated as hourly will record time worked using ADP, the time recording system used by Ark. It is against Ark policy for any employee to check another employee in or out, or for an employee to clock in or out on a device not owned by Ark. It is strictly prohibited for any hourly employee to work off-the-clock, begin work before checking in, or continue work after checking out. Employees shall immediately contact human resources if a supervisor makes any request which would violate this policy. Also, employees are prohibited from remaining on-the-clock while not at work.

In upholding Ark's values and integrity, it is important an employee use his time wisely. An employee should not clock in to work and then immediately take a break nor take a break immediately before clocking out for the day. An employee should also refrain from standing by idly while waiting to clock out in order to have the time on his time card rounded up to the next 15 minutes.

An hourly employee is required to verify accuracy and electronically approve a time card for the appropriate pay period according to the published schedule. If time cards are not approved and there are errors, the pay will reflect only what is current and verifiable. Once the time card has been corrected, the pay resulting from those corrections will be reflected on the paycheck for the next pay period. An employee is responsible for electronically approving his time card within the required time frame for each pay period. By submitting an approved time card, he certifies that the time recorded on the card was actually worked and that he did not work any time during the period covered by the time card which is not recorded on the time card.

Attendance

Ark expects each employee to show up for work on time, remain at work, and be engaged in work activities for the entire shift. Support and quality of services for the clients are greatly enhanced when supervisors can plan for and adjust to employee absences. Each department has a procedure for requesting time off, being late, or leaving work early. These procedures are designed to give supervisors the opportunity to appropriately provide the necessary support required for the people served. In addition, agency-wide training and monthly meetings are held by departments. These meetings cover information and other important aspects of work. Each employee is required to attend these meetings and will be paid for her time. An employee missing any departmental meetings will be responsible for contacting her supervisor for additional training or information. An employee who does not follow the established procedure is subject to disciplinary action, up to and including termination.

If a part-time employee is not scheduled to work for more than 90 consecutive days, her employment will automatically be terminated, UNLESS she has an extenuating circumstance and has received approval for the extended leave of absence from the President and CEO. Schedules are not guaranteed and are based on the needs of the organization.

Ark expects each employee to show up for work on time, remain at work, and be engaged in work activities for her entire shift.

Keys & Fobs

There is a \$10.00 deposit for all keys and fobs issued. This deposit will be returned when employment is terminated and all keys and fobs are returned. An employee should work with her supervisor to get keys issued. Keys and fobs checked out on a daily, temporary basis must be returned to the reception area by the end of the work day.



Testing and Training

Tuberculosis Testing
Staff Development and Training
Drugs and Alcohol



Tuberculosis Testing

All new employees are required to be tested for TB within the first 30 days of employment unless proof of TB test results (within one year) is provided to the Human Resources Department. It is the responsibility of each employee to contact public health and schedule the tests. Ark will cover the cost of the TB test initially, and once annually thereafter if a test is deemed necessary. A new employee will promptly notify the Human Resources Department if it is not feasible to begin the TB skin testing within two weeks of hire. In the event an employee's TB test is positive, she will be referred to her private physician. The private physician will need to provide a written statement of non-infectiousness and notice of treatment within five working days. Additional testing and treatment will be at the a new employee's expense. If a new employee has a recent TB test, one year or less old, which was negative, a TB assessment will be completed within one year from the previous test.

An annual TB assessment will be completed by all employees who do not have a previously documented positive TB test. An employee who does not complete the TB assessment within one year and 30 days of the previous test or assessment will be subject to disciplinary action.

An annual TB assessment will be completed by all employees who do not have a previously documented positive TB test. If any of the questions on the assessment, with the exception of the "Employment" section, indicate a yes response, an employee will be directed to Public Health. Public Health will evaluate the assessment and conduct a TB test if necessary. The evaluation by Public Health and possible TB test must be completed within 30 days of the date of the assessment. An employee who does not complete the TB assessment within one year and 30 days of the previous test or assessment will be subject to disciplinary action.

Staff Development and Training

All new employees must attend a Mandt System® Refresher Course within six months from the date of hire.

Each employee is required to attend training within the time period prescribed. New employees have 30 days from the hire date to complete New Employee Orientation (NEO), Ark Annual Training (ATT), The Mandt System®, Medications Assistant Training, First Aid, and CPR.

New employees who have documentation of current certifications in CPR and First Aid or other related training may be excused from some or all of Ark required training with the approval of the President and CEO or his designated representative.

A new employee must attend a refresher course for the Mandt System® within six months from the date of hire. An employee is required to renew certifications in the training areas that are requisite for his position. Renewal must be completed no later than 30 days past the certification expiration date. Training information is available on Therap. It is the employee's responsibility to be aware of when his certifications expire. An employee who does not have current required training and certifications will not be scheduled to work and may be subject to disciplinary action. An employee who is required to attend training, re-certification, or workshops, will be paid for the hours spent in training.

An employee who is unable to complete the required training within the specified time period must request, in writing, an extension from the President and CEO. The request must contain reasons why the training cannot be completed and the employee's schedule of when the training is expected to be finished. The President and CEO will review the request and approve or disapprove the request based on the needs of the organization and current Medicaid rules.

In addition to required training, Ark provides ongoing training for each employee to ensure the skills and competencies necessary for working effectively with people who have developmental disabilities. Supervisors will also provide ongoing department specific training. An employee must have current certification in Ark Annual Training, the Mandt System®, CPR and First Aid, Medication Assistance Training, and have received client specific Individual Needs Training (INTR) in order to work alone with clients. An employee will not be permitted to work alone and may not be scheduled for shifts if he does not: (1) obtain the necessary certifications within 30 days of being hired; (2) renew all expired certifications within 30 days of the expiration of the certification(s); and (3) receive client specific training on the person with whom he is to work.

Drugs and Alcohol

Ark Regional Services certifies and requires that all of its facilities and operations be drug free. Ark prohibits the unlawful manufacture, distribution, dispensing, possession, or use of controlled substances in any Ark facility, operation, or activity. An employee convicted of any criminal drug statute violation must notify the President and CEO within five days of that conviction. He will be subject to disciplinary action up to and including termination, and may be required to satisfactorily participate in a drug abuse assistance or rehabilitation program.

The term “controlled substances” includes, but is not limited to, marijuana, cocaine, morphine/opiates, phencyclidine (PCP), amphetamines, and methamphetamines. It does not include over-the-counter medications taken in accordance with manufacturer’s instructions or drugs prescribed by a physician for the employee when taken in the manner, combination, and quantity prescribed and used by and in the possession of the person for whom the drug is prescribed.

The term “illegal drugs” includes, but is not limited to, any form of drug, narcotic, hallucinogen, depressant, stimulant, cannabis, or other substances capable of creating or maintaining impairment or otherwise affecting one’s physical, emotional, or mental state and the sale, purchase, transfer, use or possession of which is prohibited by Wyoming or federal law. Ark does not recognize prescriptions for medical marijuana as an exception to this policy.

Ark expects every employee to report to work sober and fully capable of performing their jobs to the best of his ability and provide high quality care and services to the people served. As a result, employees are prohibited from reporting to work, working, or being on Ark premises while under the influence of controlled substances or alcohol. Employees who are on an on-call status are also prohibited from consuming alcohol or coming to work in an impaired state during the on-call status period.

All Ark employees are subject to drug and/or alcohol testing, which may be conducted when Ark has a reasonable suspicion that an employee or a group of employees is under the influence of alcohol, illegal drugs, or controlled substances while on the job.

Any employee who refuses to consent to drug or alcohol testing, tampers with a sample, tests positive, or otherwise violates this policy may be placed on leave with or without pay until an appropriate corrective action is determined. In addition, any employee who has a confirmed positive drug or alcohol test will be terminated. Please note that employees do have a right to meet with management to explain a positive test result.

All Ark employees are subject to drug and/or alcohol testing may be conducted when Ark has a reasonable suspicion that an employee or a group of employees is under the influence of alcohol, illegal drugs, or controlled substances while on the job.

Safety Is No Accident

Employee Safety

Snow Days and Unplanned Closure of Facilities

Precaution to Prevent the Transmission of

Communicable Diseases

Violence Prevention Policy

Dangerous Weapons Policy

Worker's Compensation



Employee Safety

Ark's safety policies and procedures are based on past experience and current standards. The safety of staff and the individuals supported is a top priority of the organization and an integral part of Ark's employee procedures. It is each employee's responsibility to take action to resolve immediate safety concerns. An employee is to report major or irresolvable safety concerns and/or repairs to any of the Safety Committee members, management employees, or the President and CEO either directly or in writing. Further information regarding safety policies and procedures can be found in each department's Health and Safety Manual, or an employee may contact her supervisor or a member of the Safety Committee.

Snow Days and Unplanned Closure Of Facilities

It is the policy of Ark Regional Services that employees working outside of Residential or Supported Living Departments be available to provide support at residential sites and perform other assigned tasks as required whenever non residential facilities are closed due to severe weather or additional unforeseen circumstances.

Whenever Ark Regional Services administrative and educational services close due to inclement weather, all affected administrative and educational employees shall remain available throughout the day of such an occurrence in the event that their assistance is required to provide support of individuals served or some other needed service.

It is the policy of Ark Regional Services that employees working outside of Residential or Supported Living Departments be available to provide support at residential sites and perform other assigned tasks as required whenever non residential facilities are closed due to severe weather or additional unforeseen circumstances.

Precaution to Prevent the Transmission of Communicable Diseases

Ark believes it is essential to teach and incorporate health and safety practices.

In accordance with OSHA regulations, all jobs at Ark have been analyzed to determine which are "occupationally exposed" to blood or other potentially infectious materials. Employees in jobs classified as "occupationally exposed" are encouraged to be immunized against Hepatitis-B. These are jobs in which there is reasonably anticipated skin, eye, mucous membrane, or parenteral (blood to blood or blood to non-intact skin) contact with blood or other potentially infectious material. All jobs at Ark Regional Services are classified as "occupationally exposed."

As part of Ark's Standard Precautions program, Hepatitis B immunizations will be provided to employees upon request. The Hepatitis B immunization is a series of three shots given over a period of six months. New employees have within the first 10 days of employment to decide whether to be immunized or to decline the immunizations. Employees who do not wish to have the immunizations are required to sign a declination form. If an employee who previously declined the immunizations wishes at a later date to have the series, he must contact the Human Resources Department to sign the appropriate documents. Employees will be responsible for making appointments with Albany County Public Health for the series of shots.

Personal protective equipment such as gloves, face shields, and aprons are to be used when giving support in personal care, mealtime assistance, and when doing household chores.

Ark also subscribes to standard precautions for the prevention of transmittable and/or communicable diseases and requires that all employees use the techniques prescribed in the Health and Safety Program Manual. Personal protective equipment such as gloves, face shields, and aprons are to be used when giving support in personal care, mealtime assistance, and when doing household chores, such as laundry and cleaning. Failure to use personal protective equipment when performing these tasks may result in disciplinary action up to and including termination.

Violence Prevention Policy

In an attempt to maintain a violence-free workplace, Ark Regional Services has adopted a zero-tolerance policy toward workplace violence. Accordingly, all acts or threats of violence will be taken seriously. A threat or act of violence shall include, but not be limited to, any act or gesture intended to harass or intimidate another person or that may be perceived by a reasonable person as aggressive in nature, any act, or gesture likely to damage company property, or any act or gesture likely to leave another person injured or fearing injury.

All employees are responsible for helping to maintain a violence-free workplace. To that end, each employee is required to govern himself accordingly. In addition, any employee experiencing an act or threat of violence is asked to report such act or threat to his immediate supervisor or if his supervisor is unavailable, the next person in the chain of command and/or the Human Resources Department.

Each act or threat of violence will be investigated and appropriate action will be taken. Any such act or threat may lead to disciplinary action up to and including termination.

Dangerous Weapons Policy

It is the policy of Ark Regional Services to provide a safe and healthy environment for all people who receive services from, work for, or visit Ark facilities. Possession of dangerous weapons, concealed or unconcealed, on Ark property, in Ark vehicles, or in personal vehicles when on Ark property, is a violation of Ark policy.

A dangerous weapon is any object that, by its design, can cause bodily harm or property damage, and includes, but is not limited to firearms, ammunition, explosives, knives and/or other devices, instruments, materials or substances which, by the manner in which it is used or is intended to be used, is reasonably capable of producing death or serious injury.

An employee in possession of dangerous weapons will be subject to disciplinary action, up to and including immediate termination of employment. However, certain positions (i.e. maintenance and arena personnel) may be in possession of tools needed to perform their job duties.

Possession of dangerous weapons, concealed or unconcealed, on Ark property, in Ark vehicles, or in personal vehicles when on Ark property, is a violation of Ark policy.

Workers' Compensation

The Wyoming Workers' Compensation Act requires injured employees to notify their employer of all work-related injuries within 72 hours and complete a report of injury within 10 days.

An employee who is injured while on the job should notify his immediate supervisor and complete an Ark incident report form as soon as possible. This requirement is independent of any workers' compensation paperwork or deadlines, and failure to comply with this requirement may result in disciplinary action.

The Wyoming Workers' Compensation Act requires injured employees to notify their employer of all work-related injuries within 72 hours and complete a report of injury within 10 days. Workers' compensation

paperwork can be obtained from the Human Resources Department. If assistance is needed in completing these forms, notify the Human Resources Manager or your immediate supervisor. An employee who has filed for Worker's Compensation must use accumulated personal leave while being absent from work due to the injury.

Further safety procedures and processes for injuries on the job are outlined in the Health and Safety Program. If the injury constitutes a serious health condition as defined by the Family Medical Leave Act (FMLA), the employee's leave will qualify for FMLA leave and will run concurrently.

Your Bottom Line

Compensation For Employees
Overtime Compensation
Direct Deposits
Benefit Program
Health Insurance Continuation Coverage
Holidays
Personal Leave
Court Leave
Educational Leave
Military Leave
Voting Leave
Leave Without Pay



Compensation for Employees

Full-time employees are paid according to the established schedule. Part-time employees are paid every Monday. Paper checks are available no later than 9 am on paydays; direct deposits are credited according to each financial institution's policies. Checks for full-time hourly employees will be mailed at the end of the day on payday. For part-time employees who have not picked up a check, they will be mailed at 4 pm on Wednesday. If an employee has not received a paycheck within five working days, he should notify Human Resources Department as soon as possible.

Overtime Compensation

In accordance with the Fair Labor Standards Act, non-exempt employees who are required to work in excess of 40 hours in a work week shall be compensated at the rate of one and one-half the regular rate of pay for all hours in excess of 40 hours in any one work week. For purposes of the act, Ark's work week starts Saturday at 12:01 a.m. and ends Friday at midnight.

An hourly employee must have approval from her supervisor prior to working overtime, unless it involves an emergency situation such as a client's illness or need for additional emergency assistance and/or support during the employee's shift. An employee required to work emergency overtime must notify her immediate supervisor as soon as reasonably possible. In order to avoid overtime situations, supervisors reserve the right to adjust employees' weekly work schedules. Unauthorized overtime will be paid but may be grounds for disciplinary actions.

An hourly employee must have approval from her supervisor prior to working overtime, unless it involves an emergency situation such as a client's illness or need for additional emergency assistance and/or support during the employee's shift.

Direct Deposits

Ark Regional Services offers the option of directly depositing employee paychecks. If an employee chooses this option, he must sign the appropriate forms and submit them to the Human Resources Manager. An employee is still required to electronically verify his time card to ensure the time for which he is paid is correct. An itemized payroll report will be available to him.

Upon leaving Ark Regional Services, an employee's last paycheck will NOT be directly deposited, and must be picked up at the administrative building. If it is not picked up within three working days, it will be mailed to an employee's last known mailing address.

Funds directly deposited into an employee's account are generally available the morning of payday; however, banks post their deposits at different times, so Ark cannot guarantee an employee will have access to his earnings the morning of payday. If an employee's money isn't available the morning of payday, it is the policy of Ark Regional Services to wait 24 hours before issuing a replacement check.

Benefit Program

Ark's employee benefit plans are governed by plan documents, which are available through Human Resources. This summary is provided for general information only, and the plan documents will always control eligibility and participation if in conflict with this summary.

Full-time employees and part-time employees regularly scheduled to work 25 or more hours per week are enrolled in the pension program through Wyoming Retirement System on the first day of employment. An employee will pay a portion of the contribution for participation in the Wyoming Retirement System. A full-time employee is eligible for health insurance coverage and dental insurance coverage after 90 days of continuous employment.

Open enrollment is July 1st for health insurance and January 1st for dental insurance. An employee must enroll the month prior (June for health insurance and December for dental insurance) in order to be covered on the effective date. A part-time employee is not eligible for these benefits.

All Ark employees are eligible to participate in the Deferred Compensation Plan. This is an employee paid option. More information on this benefit is available from the Human Resources Department.

Full-time employees and part-time employees regularly scheduled to work 25 or more hours per week are enrolled in the pension program through Wyoming Retirement System, a portion of which is paid by the employee, on the first day of employment.

Ark's overall benefit program will be determined by the President and CEO. Information or questions regarding the benefit program should be directed to the Human Resources Department. Ark reserves the right to alter, amend, change, or terminate any benefit program at any time with or without notice.

Health Insurance Continuation Coverage

Federal Law (PL 99-272, Title X) requires employers sponsoring group health plans to offer an employee and his family the opportunity to temporarily extend health coverage in instances where coverage under the plan would otherwise end. Ark offers such a continuation coverage plan to its employees and dependents.

When Ark is notified that one of the qualifying events has occurred as stipulated by federal law, Ark will notify an employee and/or dependent of the right to purchase continuation coverage. Information or questions regarding qualifying events should be directed to the Human Resources Department. An employee and/or dependent has 60 days from the date of lost coverage to inform Ark that continuation coverage is needed. However, an employee and/or dependent is required to continue paying monthly premiums to Ark. If continuation coverage is not purchased, the group health insurance coverage will end.

Holidays

All Ark buildings that do not serve as residences will be closed on the following holidays:

- New Year's Day (January 1)
- Memorial Day (last Monday in May)
- Independence Day (July 4)
- Labor Day (first Monday in September)
- Thanksgiving Day (Fourth Thursday in November)
- The day after Thanksgiving
- Christmas Day (December 25)

If a holiday falls on a Saturday, the preceding Friday will be the day the holiday is observed and all Ark buildings that do not serve as residences will be closed. If the holiday falls on a Sunday, the following Monday will be the day the holiday is observed and all Ark buildings that do not serve as residences will be closed. A full-time employee receives eight hours of holiday pay for the day the holiday is observed.

If a Residential or Supported Living employee is typically scheduled to work a holiday and/or the day the holiday is observed, she will be expected to work unless she has received approval to take that day off.

An hourly employee will be paid a premium of one and one-half the rate of pay for working the actual holidays listed above.

Personal Leave

Personal leave is leave with pay that an employee may use for vacation, personal appointments, illness, or other paid time off. A full-time employee will start earning personal leave on the first day of the fourth month of continuous employment. A record of personal leave earned and used will be kept by the ADP timekeeping system. Personal leave is earned by a full-time employee according to the following schedule:

Consecutive Months of Employment	Hours of Leave Per Month
Four to twelve	8 hours
Thirteen to thirty-six	12 hours
Thirty-seven to sixty	14 hours
Sixty-one to one hundred & twenty	16 hours
One hundred twenty-one or more	20 hours

A part-time employee earns eight hours of personal leave for every 160 hours of work completed. A part-time employee will start earning personal leave after 90 days of continuous employment.

Personal leave may be accumulated to a maximum of 240 hours. Upon termination of employment, an employee will be paid for any accrued personal leave at the current rate of pay. The designated beneficiary of a deceased employee will be paid for any accrued personal leave at the rate of pay the decedent was receiving at the time of death.

Full-time employees who work less than a full calendar month, because of absence from duty without pay, will accrue personal leave as follows:

Days Worked	Accumulation Rate
One through five days	1/4
Six through ten days	1/2
Eleven through fifteen days	3/4
Sixteen or more days	Full Rate

Ark retains the absolute right to decline any request for leave for any reason or no reason at all. All requests for scheduled leave shall be made in advance, by submitting a request for leave using ADP. An employee must arrange shift coverage for his regularly scheduled work hours and notify his supervisor of that coverage prior to beginning leave. If unscheduled personal leave occurs, an employee must notify his immediate supervisor as soon as possible.

Ark shall reserve the right to require an employee to take a specified amount of personal leave at a prescribed time and to otherwise schedule the use of all personal leave. For example: personal leave will automatically be used when a full-time employee does not work 40 hours in a week in order to bring the total hours up to 40. Personal leave will also be automatically used anytime a part-time employee does not work their scheduled shift.

Court Leave

Any full-time employee who is serving as a member of a jury panel or who is subpoenaed as a witness and is prevented from performing his regular duties will be granted a leave of absence with pay and without loss of personal leave time. An employee is required to sign-over court compensation to the payroll department as soon as reasonably possible. An employee will be paid at his regular rate of pay for his regular schedule during time off for court leave. An employee also has the option of taking personal leave for the court leave and keeping the compensation paid by the court.

Employees who are required to appear in court because they are a party to a civil lawsuit, or because they have been charged with a criminal offense, may take accrued personal leave, but will not receive paid leave from Ark.

Educational Leave

A leave of absence with pay may be granted to any full-time employee attending job related, short term seminars, conferences, CARF surveys, workshops, and institutes approved beforehand by the President and CEO.

An employee who wishes to enroll in a college class that occurs during normal working hours must submit in writing, prior to registration, to the President and CEO, his request to enroll in the class. The request should also contain a plan of how the missed time will be made up.

The President and CEO will review the request and approve or deny the request based on the needs of the organization.



Military Leave

A full-time employee who is a member of the National Guard or Army, Air Force, Navy, Marines, or Coast Guard Reserve, may be granted a leave of absence without pay for a period not to exceed 15 calendar days in any one calendar year to attend authorized encampments, training cruises, and similar training programs in addition to any other leave to which she is entitled. She must provide the Human Resources Department with her orders prior to taking the leave.

If military leave is extended for more than 15 days, an employee must provide the amended orders to her supervisor. While on duty, a full-time employee may maintain any health care benefits received for up to 24 months. For all military leaves not exceeding five years in length, if the employee applies for reinstatement following conclusion of military leave, depending on the length of the leave, the employee will be reinstated in their original position, or a position of like status and pay, provided the employee is qualified to perform the position.

An employee may, but is not required to use earned personal leave while on military leave.

Voting Leave

A full-time employee is granted up to one hour of leave with pay, not to include the lunch period, for voting if she is not off-duty for three consecutive hours between 7 am and 7 pm on Election Day. Scheduling time off for voting is subject to prior approval from an employee's immediate supervisor. Time taken to vote is for the purpose of voting only and is not to be used for personal errands.

Leave Without Pay

Leave without pay may be granted to an employee for a reasonable cause and for not more than five days. When such leave is needed, an employee must have the approval of his immediate supervisor and submit a request for leave using ADP.

A leave without pay for more than five days may also be granted to an employee. When such a situation occurs, an employee must write a request to the President and CEO and submit a copy of the request to his supervisor. The request should contain the reason for the leave and the dates of the requested leave. An employee may be required to find coverage for the shifts missed during the extended absence. An employee will be required to follow up by submitting a request using ADP. Ark retains the absolute right to decline any request for leave for any reason or no reason at all.

Leave without pay can only be requested after all personal leave has been used. If an employee does not return from the leave without pay as stipulated, employment may be terminated.

Odds and Ends

Donations
Mail
Petty Cash
Purchase Orders
Requests For Repair
Vehicle Use
Visitors To The Building
Out Of Town Travel On Ark Related Business
Telephone Solicitations
Email
Employee Handbook Revision/Approval Process
Surveys, Reviews, and Inspections



Donations

Ark Regional Services accepts many different kinds of donations in the form of money, clothing, household items, etc. Ark does not accept items in need of repair.

The Office Management Coordinator should be notified of all donations made to Ark locations or facilities and will complete all necessary paperwork.

Any monetary donations should be routed to the Development Manager for processing.

Ark Regional Services will write a receipt for any contribution upon request from the donor. The donor is responsible for assigning a monetary value to the donation.

Fundraising

All fundraising efforts are coordinated by the Development Manager with the approval of the President and CEO. Any employee who wishes to engage in fundraising efforts for the benefit of Ark must receive prior approval before starting any campaign or announcing fundraising efforts and work with the Development Manager throughout the process.

For any outside fundraising efforts conducted by Ark employees, it must be clear to any donor that the employee does not represent Ark Regional Services and the employee may not use Ark logos, letterhead, or any other representations of Ark without approval of the President and CEO.

Mail

The office of the President and CEO receives all incoming mail for routing purposes. Mail addressed to and/or from individuals served will be received and/or mailed unopened with exception of material that affects the President and CEO in his role as representative payee for individuals served.

Petty Cash

Petty cash is distributed by the receptionist for use in a limited scope of purchases. An employee responsible for petty cash funds must insure that a petty cash slip is completed and initialed and a receipt is obtained for all purchases. The receipt must be attached to the petty cash slip and signed by the employee making the purchase. This shall take place the same day as the purchase. The Office Management Coordinator is responsible for balancing petty cash accounts. Any discrepancies will be reported to the President and CEO.

Purchase Orders

All purchases used to acquire material for work related activities require a properly executed purchase order. All purchase orders are obtained from the reception area. When purchasing goods and/or services for the Ark, an employee should complete the following steps:

1. Send purchase order requests to the Financial Requests user group via Therap, submit a paper purchase order request to be processed, or obtain a purchase order form directly from the reception area. Complete the form by listing the business and address, the date, what is being purchased, the quantity, and the approximate total purchase amount.
2. Once supervisory approval is obtained, the purchase order form should be submitted to the Office Management Coordinator to obtain a budget code and final approval. Large purchases must be approved by the President and CEO prior to a purchase being made.

3. Present the purchase order to the cashier so they can obtain the tax exempt information. If an employee is using a purchase card, run the card as she would a regular credit card, collect the receipt, and return both copies of the purchase order to the purchase order file located in the reception area or route the purchase order to the administrative building through the courier system.
4. If an employee is not using a purchase card, give the ORIGINAL (top sheet) of the purchase order to the vendor when making a purchase. Other copies are to be returned to the purchase order file located in the reception area along with the vendor's receipt.

If it is necessary to void a purchase order, write VOID across the face of the purchase order. Place all copies in the purchase order file located in the reception area or route to the administrative building through the courier system. Do not destroy a voided purchase order.

Purchases made by mail or phone follow the same procedure as above. When making a purchase from a vendor who does not accept charges, complete the purchase order and give it to the Office Management Coordinator asking that the purchase order be sent PREPAID. In limited circumstances, an employee can obtain an Ark credit card to complete the purchase.

If an employee is using a purchase card, run the card as she would a regular credit card, collect the receipt and return both copies of the purchase order to the purchase order file located in the reception area or route the purchase order to the administrative building through the courier system.

Requests For Repair

A Request for Repair form is to be completed when there is need for repair work to be performed on vehicles, equipment, or facilities. Request for Repair forms can be obtained from the wall pocket located above the copy machine in the reception area or within each department. The following should be completed on the form: date; location address or vehicle license #; employee requesting the repair; and a detailed description of the repair needed including a detailed description of where in the facility the problem is occurring (i.e. kitchen; Jane's bedroom, bathroom). Forms can be submitted to the reception area in person or through the courier system. Repairs will be made as soon as possible on a priority basis. The on-call phone number should only be used for emergency situations that require immediate attention or create an immediate safety issue.

Vehicle Use

Vehicles owned by Ark Regional Services are available for employee use only for official company related business, unless otherwise approved by the President and CEO. Employees who operate company vehicles must be approved by Ark's insurance carrier and be properly licensed.

Use of company vehicles for out of town travel must be arranged with the Vice President of Maintenance and Technology. All out of town trips, including medical appointments for a person served, business seminars, or other business related errands, must be approved by the supervisor using the Travel Approval Form.

When operating any vehicle used in the course of Ark business, all passengers and operators must wear seat belts. It is the ultimate responsibility of the operator to ensure that the seat belts of all passengers are properly secured.

If an employee is involved in an accident while operating a fleet vehicle, the employee should notify the police and wait at the scene for their arrival. Assist clients as appropriate. Make sure you are given a copy of the other driver's Information from the police officer. Report the incident to your supervisor and complete a Blue Incident Report Form. Submit a GER if clients were in the vehicle.

Although not encouraged, an employee may choose to use a personal vehicle. In accordance with industry standards for automobile insurance coverage, if an employee uses her personal vehicle for business purposes and is in an accident, the employee's personal automobile insurance will be the exclusive source for insurance coverage for any bodily injury to others, including clients who are passengers in the vehicle. If the employee sustains bodily injury as a result of an accident that occurs during the course of employment (not commuting to or from work), the injury may be covered by Wyoming Workers' Compensation, and the employee must complete a report of injury.

Ark's automobile and general liability insurance will not provide any coverage unless the injured party proves fault on the part of Ark due to Ark negligence. Additionally, the employee's personal insurance will provide the coverage for any property damage that occurs. Ark Regional Services will not be responsible for the cost of any required repairs or the cost of alternative transportation necessitated by property damage to the employee's vehicle. If an employee chooses to use a personal vehicle for Ark related business, she must hold sufficient automobile liability coverage (\$100,000 bodily injury per person, \$300,000 bodily injury per accident, and \$100,000 property damage OR \$500,000 combined single limit) and provide evidence of such coverage to the human resources department and complete necessary paperwork. It is also required that the employee maintain this coverage after proof of coverage is received. Proof of insurance must be submitted to the human resources department and the appropriate liability releases must be signed prior to an employee using her own vehicle. If an employee chooses to use her own vehicle for work purposes, Ark strongly advises that she contact her insurance company to ensure company travel is covered under her policy.

If an employee chooses to use a personal vehicle for Ark related business, she must ensure that the vehicle is safe to operate and in good repair, as determined by a reasonable person. Before operating any vehicle used in the course of Ark business, it is the employee's responsibility to conduct a walk around inspection that includes checking the tires, lights, blinkers, and identifying any damage. If a problem is identified, a different vehicle should be used. If the problem is identified on a company vehicle, a Request for Repair Form should be completed for the damaged vehicle.

Ark Regional Services will not reimburse mileage or the cost of gasoline, so the employee is encouraged to contact her tax advisor to determine how the cost of mileage might be declared as a tax deduction.

Visitors

Visitors who enter any building owned or operated by Ark Regional Services should be greeted by an Ark employee. Although buildings operated by Ark are public in nature (excluding Residential and Supported Living settings), visitors should not interrupt classes, meetings, or wander around unaccompanied.

In residential settings, visitors should be present only when visiting a person who lives at that location. The visitor should always be accompanied by the person they are there to visit and should show respect to the other people residing in the home. Employees should not have visitors at anytime.

If an unfamiliar person is in a building, it is every employee's obligation to inquire as to the business of the individual and escort them to the individual they are there to see.

Out of Town Travel on Ark Related Business

All out of town travel must be approved prior to registering for an event or making reservations or travel arrangements. This includes travel related to client trips, business related seminars, trainings, conferences, or other miscellaneous purposes. Trips involving clients must be approved by the Vice President - Support Services and the Client Services Manager. All other trips must be approved by the supervisor and the President and CEO.

For travel outside of Albany County, a Travel Approval form must be completed with information on departure from and return to Laramie and an estimate of expenses. This form must be submitted to the appropriate supervisor or CSM. Only after notification of approval can registration and/or travel arrangements be made. If an employee is accompanying a person served, the travel form must also indicate that the appropriate guardian contacts have been made if applicable.

Travel that requires an employee to spend the night out of Laramie should also submit a Travel Expense form. This form is used to obtain a per diem for meals, etc. If travel does not include an overnight stay, an employee must submit receipts for meals and other business related expenses. After the travel is completed, the Travel Expense form must be signed and dated to verify that the expenses were actually incurred. Please contact your CSM or supervisor for specific processes.

Telephone Solicitations

Ark employees are not to speak with telephone solicitors. If a solicitation call is received, employees are to professionally inform the caller that Ark does not accept solicitation calls and politely end the call.

Email

Employees should never open email or email attachments from an unknown source. Additionally, emails with an .exe file should never be opened, even when the sender is known. The .exe files can run programs that once initiated, can do damage to files on the network before they can be stopped.

The sending and receiving of personal emails and/or internet use during work hours should be infrequent, short in duration, and should not take away from assigned duties.

Employees should never open email or email attachments from an unknown source. Additionally, emails with an .exe file should never be opened, even when the sender is known.

SComm

Secure Communications (SComm) over Therap are used to communicate information between employees. Only information that pertains to Ark and the execution of the day to day operations of the organization should be communicated over SComm. Employees are not to use SComm to share or distribute information that is not directly related to the operations of the organization without permission from the President and CEO.

Employee Handbook Revision/Approval Process

All policies and procedures contained within the Employee Handbook must be periodically and consistently reviewed/revised to ensure all material is current. The following steps must be taken to ensure the revision process is sustained.

1. Every year the Employee Handbook will be reviewed. Ark reserves the right to modify, suspend, or revoke any policy or procedure at any time. Additionally, every two years, the President and CEO shall appoint a committee to review the Employee Handbook. A report of this review shall be submitted to the President and CEO. All procedures will be reviewed annually.
2. The Program Integrity Manager will be responsible for coordinating the overall review process.
3. The Ark Board of Directors will review the Handbook annually prior to final approval by the President and CEO.
4. During the revision period, all affected employees will be responsible for reviewing their respective procedures by addressing any changes in procedure (additions, deletions, changes in language, updates, etc.)
5. Following President and CEO approval, revised material will be distributed to each department/work area, be updated on the Ark website, and be available to employees who wish to have a paper copy of the Employee Handbook.
6. If a policy change occurs prior to the revision period, an employee will be required to approve the change via Therap.



Surveys, Reviews, and Inspections

Ark Regional Services is subject to a variety of surveys and reviews by outside agencies including CARF, the Wyoming Department of Health Behavioral Health Division (BHD), and the Occupational Safety and Health Administration (OSHA). The input that is provided through these reviews, and the opportunity to make improvements to the overall services, is valuable.

During any review, survey, or inspection, all employees will treat guests with respect. While maintaining confidentiality as appropriate, employees will answer questions and will adhere to Ark's value of integrity, which honesty and transparency in business practices is promoted. In situations in which an employee doesn't know an answer to a question that has been presented, she will state that she doesn't know the answer, will investigate, and will get back to the person with the question.

Although surveys are typically scheduled, a “surprise drop in” can happen at any time. Ark Regional Services promotes the idea of being “survey ready” at all times. This means that if a representative from the BHD, or CARF, or OSHA, or any regulatory or accrediting agency were to drop by with no warning and perform an inspection, Ark would pass the inspection with no problems found. Employees shall notify their supervisor as soon as possible if any external representative arrives for an inspection or requests information. Also, all requests for files, client information or documents should be referred to the Program Integrity Manager; you should not provide documentation to any external inspector directly.

Although it is ultimately the responsibility of each employee at Ark Regional Services to ensure that things are clean, each person served has a responsibility to take care of their home. Employees should encourage engagement, get people involved in taking care of his space and things, and make it fun.

All Ark employees should certainly put her best foot forward when accrediting agencies come to visit, but that should never be the reason she does something. She should put her best foot forward every single day because it is the right thing to do, and the people receiving support deserve the best...every day!



Legal Matters

False Claims and False Claims Recovery
Contract For Outside Service
Employee References and Release Of Information
Policy Prohibiting Retaliation Against Employees
Harassment
Workplace Monitoring Policy
Policy Regarding Information Relating To Legal Proceedings
Use Of Organizational Resources For Personal Gain
Tobacco and Vaping Policy
Nepotism Policy
Public Relations Activities
Volunteers, Interns, and Special Guests
Cellular Phone Usage
Blogging and Social Media Policy
Technology Policy
Animals and Pets At Work
Disciplinary Action
The Family and Medical Leave Act (FMLA) of 1993



False Claims And False Claims Recovery

This policy has been adopted to set forth the commitment of Ark Regional Services to comply with (1) the Federal False Claims Act, 31 U.S.C. § 3729, et seq.; (2) the Wyoming False Claims Act W.S. 9-11-201 through 9-11-212; and (3) state Medicaid plan amendments promulgated to comply with Section 6032 (Employee Education About False Claims Recovery) of the Deficit Reduction Act of 2005 (“DRA”). The DRA requires that state Medicaid Plans be amended to require certain types of providers to establish written policies that address the following: (1) the federal civil False Claims Act (“FCA”); (2) state laws pertaining to civil or criminal penalties for false claims and statements; (3) the whistleblower protections provided under both federal and state laws, and the role of these laws in preventing and detecting fraud, waste, and abuse; (4) the administrative remedies found in the Program Fraud Civil Remedies Act; and (5) Ark Regional Services’ policies and procedures for detecting and preventing fraud; waste and abuse.

All Ark Regional Services employees, directors, and independent contractors who provide services on behalf of Ark Regional Services must adhere to this policy.

Ark Regional Services has long established as its policy that employees of Ark comply with all relevant federal and state law and regulations including, but not limited to, those laws and regulations related to billing and documentation practices. No Ark employee or representative has the authority to direct, participate in, approve, or tolerate any violation of any of the laws described in this policy.

- Any Ark employee or representative who knows or reasonably believes that any employee or representative of Ark Regional Services may be involved in any activity prohibited by the FCA, similar state laws, or other fraud and abuse laws is required, as a condition of employment, to immediately report such belief using established incident reporting procedures, which includes reporting the matter to his supervisor, any member of leadership, the Human Resources Manager, or the President and CEO.
- Ark Regional Services will not take, or tolerate, any intimidating or retaliatory act against an individual who, in good faith makes a report of practices reasonably believed to be a violation of this policy. See the Policy Prohibiting Retaliation Against Employees Who Take Action On Account of Potentially Illegal Activities.
- Ark Regional Services shall make available to all Ark employees written materials regarding compliance with the FCA and the Wyoming FCA.
- Ark Regional Services shall maintain its internal systems and controls to monitor its coding and billing practices on an ongoing basis to ensure compliance with the FCA and Wyoming FCA

False Claim Act

I. Federal Civil False Claims Act (“FCA”)

The FCA was originally enacted in 1863 after a series of Congressional inquiries disclosed several instances of fraud among defense contractors during the Civil War. The current FCA was passed by Congress in 1982 and was amended in 1986. The FCA is designed to enhance the government’s ability to identify and recover losses it suffers due to fraud. Since the FCA’s enactment, the government has recovered billions of dollars through litigation or settlement of allegations that corporations and individuals violated the statute and improperly obtained federal health care program funds. Congress and the government believe that the FCA is a very effective means to detect fraud, by encouraging individuals, often called “whistleblowers” or “relators,” to uncover and report fraud, and to prevent fraud, by creating strong incentives for companies and individuals to be vigilant in their pursuit of compliance and avoid liability for multiple damages and penalties under the statute.

Ark Regional Services has long established as its policy that employees of Ark comply with all relevant federal and state law and regulations including, but not limited to, those laws and regulations related to billing and documentation practices.

1. FCA Prohibitions

The federal civil False Claims Act prohibits any individual or company from knowingly submitting false or fraudulent claims, causing such claims to be submitted, making a false record or statement in order to secure payment from the federal government for such a claim, or conspiring to get such a claim allowed or paid. Under the statute the terms “knowing” and “knowingly” mean that a person (1) has actual knowledge of the information; (2) acts in deliberate ignorance of the truth or falsity of the information; or (3) acts in reckless disregard of the truth or falsity of the information. Thus, specific intent to defraud is not required for there to be a violation of the law. Examples of the types of activity prohibited by the FCA include billing for services that were not actually rendered and upcoding, the practice of billing for a more highly reimbursed service or product than the one provided.

The FCA is enforced by the filing and prosecution of a civil complaint. Under the Act, civil actions must be brought within six years of a violation, or, if brought by the government, within three years of the date when material facts are known or should have been known to the government, but in no event more than ten years after the date on which the violation was committed.

2. Penalties

Individuals or companies found to have violated the statute are liable for a civil penalty for each claim of not less than \$5,500 and not more than \$11,000, plus up to three times the amount of damages sustained by the federal government.

3. Qui Tam and Whistleblower Protection Provisions

The FCA authorizes the Attorney General to bring actions alleging violations of the statute. The statute also authorizes private citizens to file a lawsuit in the name of the United States for false or fraudulent claims submitted by individuals or companies that do business with, or are reimbursed by, the United States. Commonly known as a qui tam action, a lawsuit brought under the FCA by a private citizen commences upon the filing of a civil complaint in federal court, under seal, and service of a disclosure of material evidence on the Attorney General. The government has sixty days to investigate the allegations in the complaint and decide whether it will join the action, in which case the complaint is unsealed, and the Department of Justice or a United States Attorney’s Office takes the lead role in prosecuting the claim. If the government decides not to join, the whistleblower may pursue the action alone, but the government may still join at a later date if it demonstrates good cause for doing so. As an incentive to bring these cases, the Act provides that whistleblowers who file a qui tam action may receive a reward of 15-30% of the monies recovered for the government plus attorneys’ fees and costs. This award may be reduced if, for example, the court finds the whistleblower planned and initiated the violation. The FCA also provides that putative whistleblowers who prosecute clearly frivolous qui tam claims can be held liable to a defendant for its attorneys’ fees and costs.

The federal civil False Claims Act prohibits any individual or company from knowingly submitting false or fraudulent claims, causing such claims to be submitted, making a false record or statement in order to secure payment from the federal government for such a claim, or conspiring to get such a claim allowed or paid.

Whistleblowers are also offered certain protections against retaliation for bringing an action under the Act. Employees who are discharged, demoted, harassed, or otherwise confront discrimination in furtherance of such an action or as a consequence of whistle blowing activity are entitled to all relief necessary to make the employee whole. Such relief may include reinstatement, double back pay, and compensation for any special damages including litigation costs and reasonable attorneys’ fees.

4. Program Fraud Civil Remedies Act of 1986

A similar federal law is the Program Fraud Civil Remedies Act of 1986 (the “PFCRA”). It provides administrative remedies for knowingly submitting false claims and statements. A false claim or statement includes submitting a claim or making a written statement that is for services that were not provided, or that asserts a material fact that is false, or that omits a material fact. A violation of the PFCRA results in a maximum civil penalty of \$5,000 per claim plus an assessment of up to twice the amount of each false or fraudulent claim.

II. Wyoming False Claims Act

Wyoming, like many states, has enacted a statute like the federal FCA that provides a civil remedy for the submission of false and fraudulent claims to the state, including to state health care programs such as Medicaid. Courts may assess penalties of not less than five thousand dollars (\$5,000.00), nor more than ten thousand dollars (\$10,000.00) for each act, as well as civil penalties up to three times the amount of damages that a governmental entity sustains because of a person's act, along with the cost of attorney and court fees. The Wyoming FCA does not apply to claims for unemployment or workers' compensation benefits, submissions relating to state taxes, or statements made in the course of obtaining licensure.

The Wyoming False Claims Act includes whistleblower provisions that allow enforcement through qui tam actions, and protect whistleblowers employed by governmental entities from retaliation. Wyoming statutes also impose criminal penalties for the submission of false claims to a state health care program. See (W.S. 9-11-201 – 9-11-212) Under some circumstances, the Wyoming FCA permits citizens who report and/or pursue recovery of false claims to share in the penalties assessed under the statute.

III. Policies and Procedures for Detecting and Preventing Fraud, Waste, and Abuse

Ark Regional Services' Chief Executive Officer and Corporate Compliance Officer are responsible for the proactive prevention of fraud and abuse through education and training of all Ark employees. Similarly, Ark employees always have a responsibility to report concerns about actual or potential wrongdoing and are not permitted to overlook such actual or potential wrongdoing. Ark Regional Services has several policies aimed at protecting fraud, waste, and abuse. These include:

1. Corporate Compliance Policy;
2. Policy Prohibiting Retaliation Against Employees Who Take Action On Account of Potentially Illegal Activities.
3. Billing Review Procedure;

Whenever an Ark employee has any question about the possible application of the above laws to any activities, he should consult with his supervisor, or the Ark Corporate Compliance Officer.

Ark employees always have a responsibility to report concerns about actual or potential wrongdoing and are not permitted to overlook such actual or potential wrongdoing.

Contract For Outside Service

Based on a determination of need and in compliance with IRS regulations, the President and CEO may authorize contracts for outside services. The contracts will be initiated and drafted by Ark and may be reviewed by Ark's legal counsel. The contracts will be limited to one year but may be renewed upon approval of the President and CEO.

Employee References And Release Of Information

Ark Regional Services will not disclose any information regarding the employment of a current or former employee except as described in this policy.

Employees are to refer all requests, written or verbal, for personnel information concerning applicants and current or former employees to the Human Resources Department.

Employees are to refer all requests, written or verbal, for personnel information concerning applicants and current or former employees to the Human Resources Department. Human resources will respond to such requests by providing dates of employment and position information and will confirm or deny a last salary or wage if stated by the inquiring party.

Upon receipt of a signed release from the employee in a form acceptable to Ark, supervisors may prepare letters of recommendation for the limited purpose of an employee's application for admission or participation in an education program which requires such a letter. All recommendation letters will be prepared by the supervisor and must be approved by the Human Resources Department. Also, employees who request such letters should be aware that the letters must accurately reflect all circumstances of employment, positive or negative. Ark reserves the right to decline any request for letters of recommendation.

Policy Prohibiting Retaliation Against Employees

The protection provided under this policy includes, but is not limited to, protection from retaliation in the form of adverse employment actions such as termination, suspension, or demotion.

Ark policy prohibits retaliation of any variety against any Ark employee who: (1) discloses, or threatens to disclose, information to a governmental agency of an activity of Ark Regional Services that is in violation of law, rule, or regulation; (2) provides information to a governmental agency conducting an investigation, hearing, or inquiry into alleged violations by Ark Regional Services of any law, rule or regulation; or (3) objects to or refuses to participate in any activity, policy, or practice of Ark Regional Services which is in violation of any law, rule, or regulation. The protection provided under this policy includes, but is not limited to, protection from retaliation in the form of adverse employment actions such as termination, suspension, or demotion.

Employees are not responsible or authorized to investigate the activity or to determine fault or corrective measures; appropriate Ark management officials are charged with these responsibilities. Insofar as possible, the confidentiality of employees making reports under this policy will be maintained. Ark expects all employees to exercise sound judgment to avoid baseless allegations.

If an employee has knowledge of information that suggests that Ark is in violation of any law, rule, or regulation as described above, the employee is encouraged to contact his immediate supervisor or Bob Sell, President and CEO at (307) 742-6641, ext. 110 or Angela Mosley, Program Integrity Manager, ext. 152, at Ark Regional Services. Any employee who believes he is experiencing retaliation for actions protected under this policy must contact Mandy McMicheal, Human Resources Manager, immediately at (307) 742-6641, ext. 148.

Harassment

Ark is committed to providing a work environment that is free of discrimination and unlawful harassment based on race, color, gender, national origin, age, religion, disability status, military service or veteran status, or genetic information. Harassment (both overt and subtle) is a form of employee misconduct and is strictly prohibited. Ark will not tolerate any form of harassment.

Employees are encouraged, but not required to ask others to stop the offensive conduct when it occurs. However, there is no requirement that an employee ask others to stop offensive conduct before or instead of reporting such conduct under the Harassment Reporting Procedure below, if the employee does not feel comfortable asking the offending person to stop or does not believe that the offending person will respond constructively to such a request.

Harassment includes any verbal or physical conduct of an offensive nature which is based on any protected characteristics, including offensive comments, jokes, innuendos, insults, or other forms of inappropriate conduct based on such characteristics. Harassment also includes offensive or harassing statements or conduct which is motivated by a person's race, color, gender, national origin, age, religion, disability status, military service or veteran status, or genetic information, whether or not the statements or conduct are overtly derogatory toward those protected characteristics. Violations of this policy by employees will result in disciplinary action, up to and including employment termination.

This policy can be violated by conduct of other employees, managers, vendors, visitors, clients, customers, or any person who interferes with the working environment of Ark employees.

This policy prohibits all varieties of sexual harassment, including unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual or otherwise offensive nature when:

- a. Submission to such conduct is made either explicitly or implicitly a condition of an individual's continued employment, or
- b. Submission or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual, or
- c. Such conduct has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.

This policy can be violated by conduct of other employees, managers, vendors, visitors, clients, customers, or any person who interferes with the working environment of Ark employees.

Likewise, this policy prohibits any verbal or physical conduct of a sexual or otherwise offensive nature, including offensive comments, jokes, innuendos, other sexually oriented statements, and insults or inappropriate conduct based on protected status such as gender.

a. **Management Responsibility:** Management responsibilities and obligations under this policy include, but are not limited to: monitoring the workplace and responding to any violations of this policy, encouraging employees who have complaints to report those complaints, investigating thoroughly any and all reports of harassment, and taking corrective action when necessary to change, modify, or control situations involving confirmed claims. All supervisors are required to immediately report any complaint or observation of conduct which may violate this policy to the Human Resources Department.

b. **Harassment Reporting Procedure:** An employee who believes that he has been subject to or has observed any form of harassment or discrimination based on one of the characteristics listed above should immediately report the circumstances to his immediate supervisor. If that individual is unavailable or an employee believes it would be inappropriate to contact that person, an employee should immediately contact the Human Resources Manager or any leadership team member.

c. **Investigation and Confidentiality:** The Human Resources Manager, the Program Integrity Manager, or other appropriate designees will investigate all reports or observations of conduct which may violate this policy. Confidentiality of the report and investigation will be maintained to the greatest degree possible consistent with the need to conduct a thorough and complete investigation.

d. **Retaliation is Prohibited:** No adverse employment action will be taken for any employee making a good faith report of alleged harassment or discrimination. Any retaliatory conduct should be reported through the procedure stated in the preceding paragraph.

e. **Corrective Action:** In the event, upon investigation, Ark concludes that discrimination, harassment, or other inappropriate conduct has occurred, the responsible employee may be subject to disciplinary action, up to and including termination of employment. The President and CEO will make the final decision on disciplinary action.

Confidentiality of the report and investigation will be maintained to the greatest degree possible consistent with the need to conduct a thorough and complete investigation.

Workplace Monitoring Policy

From time to time, Ark may photograph or videotape employee activities while at work or on Ark owned or managed property. This is done for legitimate business purposes, such as:

- to evaluate employee job performance;
- to use in connection with employee training and quality assurance activities;
- to improve the health and safety of clients and employees;
- to disclose and investigate incidents of misconduct, abuse, neglect, criminal activity, policy violations, or other instances of inappropriate behavior by employees;
- to prevent theft or destruction of Ark or client property.

Ark reserves the right, except as limited by law, to photograph or videotape employee activities and to monitor and record employee workplace communications and conversations without notice.

In some cases, an employee may be notified in advance of such photographic or video monitoring. For example, Ark may conduct videotape monitoring of clients and common areas in accordance with the Plan of Care. However, Ark reserves the right, except as limited by law, to photograph or videotape employee activities and to monitor and record employee workplace communications and conversations without notice. Ark will not photograph or monitor any area where employees have a reasonable expectation of privacy, such as employee bathrooms.

Ark employees may not modify, obstruct, damage, disable, or otherwise tamper with any video or photographic device installed in any Ark property. Conducting activities or interactions involving Ark clients in a manner intended to avoid or hide from video or photographic monitoring will result in disciplinary action up to and including termination of employment.

Policy Regarding Information Relating To Legal Proceedings

From time to time, Ark employees are requested to provide information, documents, or testimony relating to a legal proceeding, an investigation inquiry by a private attorney, or inquiries or investigations by governmental agencies. It is Ark's policy to fully comply with its legal obligations, while taking all steps it believes are necessary to protect the privacy interests of the individual served, and employees, and the confidential aspects of Ark's business. Also, certain information regarding the person served may be protected from disclosure by federal or state law or regulation.

This policy applies to the following types of documents or communications:

- A subpoena, court order, or governmental agency request requiring the production of documents or information regarding Ark or any person served or employee, or requiring any employee to give testimony in any lawsuit, legal proceeding, or administrative investigation regarding Ark or any person served or employee;
- A garnishment, support order, maintenance order, writ of attachment, or writ of replevin relating to Ark or any Ark employee or person served;
- A summons or complaint identifying Ark or any Ark employee or person served as a party to a lawsuit or legal proceeding;
- A verbal, written, or email inquiry from an attorney, paralegal or private investigator relating to Ark or any Ark employee or person served.

Any Ark employee who receives one of these types of documents or communications should immediately contact her supervisor or if her immediate supervisor is unavailable, the next person in the chain of command AND the Program Integrity Manager, who will contact the appropriate program department head. The employee should not release any information or documentation without first receiving directions from the President and CEO or his representative. Ark will consult with legal counsel, as necessary and appropriate, to determine Ark and the employee's obligation to respond to the document or appropriate, to determine Ark's and the employee's obligation to respond.

Employees should not release any information or documentation without first receiving directions from the President and CEO or her representative.

It is Ark's policy to cooperate with official law enforcement activities. If law enforcement officers serve a search warrant to search any property or premises owned or leased by Ark or one of the people served by the Ark, the employee should immediately comply with the search warrant and contact her supervisor. If law enforcement officers request information regarding an employee or person served by Ark or they request consent to search Ark's property without a search warrant, the employee should immediately refer the law enforcement officers to the President and CEO.

No Ark employee is authorized to grant permission to law enforcement officers who do not have a search warrant to search any property or premises owned or rented by one of the people served by the Ark.

Use Of Organizational Resources For Personal Gain

As outlined in Ark's Ethical Code of Conduct, employees are prohibited from using organizational resources for personal gain. This includes using company vehicles for personal appointments, engaging in personal activities while on-the-clock, remaining on-the-clock while not working (except during authorized breaks) and utilizing organizational funds/supplies for personal purposes, except to the extent that personal use of company vehicles has been authorized for particular employees. This also includes using office computer systems, voice communication systems, or internet access for personal and/or financial gain. In special circumstances, the President and CEO or his authorized representative can make exceptions to this policy.

Tobacco and Vaping Policy

Ark prohibits the use of any tobacco, vaping, and e-cigarettes while on duty or in Ark facilities, buildings, vehicles, or other enclosed area. This would include smoking, chewing tobacco or snuff, as well as vaping or any other form of electronic cigarette or vapor inhalant. Smoking and vaping is permitted only in designated smoking areas. Ash receptacles will be provided at appropriate outdoor locations. Smoking areas will be a reasonable distance from all entranceways, passageways, and operable windows or ventilation systems of buildings owned or operated by Ark.

Nepotism Policy

Unless otherwise approved by the President and CEO, no employee shall act in a direct supervisory capacity over a member of his immediate family. For the purpose of this policy, "immediate family" includes an employee's spouse, children, step-children, parents, step-parents, parents-in-law, siblings, step-siblings, half-siblings, siblings-in-law, and grandparents. Employees also may not act in a direct supervisory capacity over any other relative or individual who is residing in the employee's home.

Public Relations Activities

It is imperative that all people associated with Ark Regional Services represent the organization honestly, fairly, and accurately at all times. When preparing for presentations, speeches, research projects, papers, or other activities that include distributing or sharing information about Ark Regional Services, information must be accurate and up-to-date.

If an employee is in need of public relations resources, it is suggested she contact the Development Manager or the Outreach Specialist.

Only the President and CEO or his appointed representative is authorized to speak on behalf of Ark Regional Services.

Volunteers, Interns, & Special Guests

In order to obtain authorization, an employee must complete a Request for Volunteers, Interns, or Special Guests form, have the form signed by her Department Head at least two weeks prior to the event.

All projects, events, or activities which involve volunteers, interns, observers, or special guests must be approved by the President and CEO.

A volunteer, intern, observer, or special guest is any individual or group who will visit Ark Regional Services facilities and is not an employee or contracted labor.

In order to obtain authorization, an employee must complete a Request for Volunteers, Interns, or Special Guests form, have the form signed by her department head at least two weeks prior to the event.

For volunteers and interns, authorization should be obtained well in advance in order to complete the required paperwork.

Cell Phones

Cell phones do not have secured lines; therefore, employees should use the following guidelines when speaking on a cell phone:

1. Do not use full names of persons receiving services or volunteer information that could be used to easily identify a particular person.
2. Do not discuss confidential or sensitive issues in public areas where you may be overheard.
3. Personal cell phone usage, both voice and text messaging, is strongly discouraged while working at Ark Regional Services. Personal phone calls and cell phone usage should be infrequent, short in duration, of an urgent nature, and not take away from your assigned duties.

Employees are prohibited from using photographs of clients for personal use, posting photos of clients on social media or otherwise distributing images of clients in any manner other than those described in this handbook.

If it is necessary to call or text someone while driving an Ark vehicle, employees are required to pull over in a safe location to place the call or send the text.

Photographs

Employees are prohibited from using photographs of clients for personal use, posting photos of clients on social media or otherwise distributing images of clients in any manner other than those described in this handbook. If an employee utilizes a personal camera, cell phone, or other device to capture an image of a client, those photos are protected by the individual's Photograph Release form and can only be used in the manner outlined in the release. Employees are required to submit client photos to the Outreach Specialist as soon as possible to ensure that the photos are only used in the manner for which Ark has permission. The photo can be emailed to outreach@arkrs.org, or the employee can bring the device to the Outreach Specialist and have the photos transferred off the employee's device. The employee should delete the photo immediately after it has been received by the Outreach Specialist.

Electronic Signatures

Ark requires members of its workforce to use electronic signatures (e-signature) to verify time worked and documentation of services provided. To the fullest extent permitted by law, an e-signature is legally binding and equivalent to handwritten signatures. Individuals who falsify e-signatures are subject to disciplinary action, up to and including termination of employment and criminal prosecution, as specified under Ark policy and applicable federal and state laws. Individuals are required to report any suspect or fraudulent activities related to e-signatures immediately to his or her supervisor or Ark's Security Officer. Employees are required to agree to an Acknowledgment of Electronic Signature prior to completing documentation of services billed through the Medicaid Home and Community Based Waiver. Ark will adopt security procedures related to e-signatures that are practical and secure, including but not limited to password guidelines, secure transmission standards, and access control policies.

Blogging and Social Media Policy

Web logs (“blogs”), wikis, social media sites, and other forms of online discourse have become common methods of self-expression. Ark respects the right of an employee to engage in these types of communications on his personal time and using his personal computer equipment and internet service. However, activities in or outside of work that affect his job performance, the working environment or performance of others, or Ark’s business interests are a proper focus for company policy.

If an employee is uncertain about whether information or content that he intends to post is a violation of this Blogging Policy, he should seek guidance. For questions about these rules or any matter related to personal websites or blogs, contact the Human Resources Manager or the Program Integrity Manager.

The policies that apply to employees at work – such as Ethical Code of Conduct, Value Statement, Sexual and Other Discriminatory Harassment Policy, and Confidential Information – apply to employees’ online statements, postings, and discussions, even during non-work time, if those activities can have a negative effect on Ark or the working environment of Ark employees. If an employee identifies himself or could reasonably be identified as an Ark employee on any website and post messages that relate to Ark, its employees, customers, students, or business, he must follow these guidelines:

- **Use a Disclaimer:** Make it clear the views an employee expresses are his alone and do not necessarily reflect Ark’s views. Use a disclaimer similar to: “The views expressed on this website/weblog are mine alone and do not represent my employer’s views.”
- **Special Responsibility of Supervisors:** A supervisor has a special responsibility because his postings may be misunderstood as expressing Ark positions. Therefore, a supervisor who intends to engage in personal posting may not discuss matters related to Ark without advance written authorization from Ark.
- **Confidential and Proprietary Information:** Never communicate such information externally. An employee must not discuss or reveal any client-related information outside Ark. Confidential information generally includes client lists, client information or pictures, personnel matters, financial aid files, financial and marketing data, research and business plans, business strategy, and business decisions.
- **Respect Intellectual Property:** For Ark’s and an employee’s protection, an employee must abide by the laws governing trademarks, copyright, and fair use of copyrighted material owned by others, including Ark’s own intellectual property. An employee’s personal postings should not include the company’s logos or trademarks, and should respect other applicable copyright, privacy, fair use, and financial disclosure laws.
- **Personal Legal Responsibility:** An employee is what he publishes. When an employee chooses to make public his opinions via a website, posting, or blog, he is legally responsible for his comments, and third parties may hold him personally liable for any comments deemed to be unlawful.
- **Equipment Usage:** An employee is prohibited from using Ark’s equipment to access, maintain, review, or participate in blogs or social media unless expressly authorized to do so for an Ark business purpose.
- **Media Contact:** If a member of the media contacts an employee about an Ark-related blog posting or requests information of any kind about Ark, please immediately refer the matter without comment to Ark’s President and CEO.

If an employee is uncertain about whether information or content that he intends to post is a violation of this Blogging Policy, he should seek guidance. For questions about these rules or any matter related to personal websites or blogs, contact the Human Resources Manager or the Program Integrity Manager.

Violation of this Blogging Policy may subject an employee to disciplinary action, up to and including termination, and/or require him to delete his post or blog.

Nothing in this policy is intended to restrict or interfere with employees’ rights under the National Labor Relations Act, and this policy will not be enforced against activity that is protected under that Act.

Technology Policy

All Ark computer and communications systems, such as telephone systems, voicemail, e-mail, cell phones and devices, texting or instant-messaging devices, computers, networks, data storage, internet access, and associated software products, as well as all data and information transmitted by, received from, or stored on those systems, are the property of Ark. As such, these systems are to be used for job-related purposes only.

Ark recognizes that employees must sometimes place or receive personal calls on company telephones or use Ark's electronic communication and internet systems for personal purposes. In order to preserve the integrity and availability of these systems for business use, it is essential that all employees minimize and not abuse personal use of these systems. An employee using Ark's computer and communications systems and business property for personal use do so at her own risk and should have no expectation that her personal communications and uses are confidential, private, or privileged. To ensure that Ark's computer and communications systems and equipment are used only for legitimate business purposes, Ark may monitor the use of such systems from time to time, without prior notice. This may include listening to stored voicemail or monitoring an employee's use of the internet, e-mail, texting, voice mail, and other Ark computer systems.

Using Ark's computer and communications systems in the following way is expressly prohibited and may result in discipline, up to and including termination:

- Sending, accessing, receiving, posting, or storing data that are discriminatory, harassing, or defamatory.
- Sending, accessing, receiving, posting, or storing sexually explicit material.
- Using Ark systems to send or post intimidating messages or hate speech.
- Using Ark systems to for the purpose of gambling or placing wagers or bets.
- Using Ark systems to conduct illegal activities.
- Sending, receiving, or posting messages that contain inappropriate or profane language.
- Installing personal software or applications (including desktop themes and screen savers) on Ark-issued computers or other devices.
- Downloading, copying, or transmitting works of others in a manner that constitutes infringement under copyright laws.
- Transmitting or posting confidential Ark or client-related information to unauthorized individuals.

To ensure that Ark's computer and communications systems and equipment are used only for legitimate business purposes, Ark may monitor the use of such systems from time to time, without prior notice. This may include listening to stored voicemail or monitoring an employee's use of the internet, e-mail, texting, voice mail, and other Ark computer systems.

Animals and Pets at Work

Animals are not allowed at any building owned or leased by Ark, for any reason, without written permission from the President and CEO, with the exception of service animals.

Disciplinary Action

Causes for Disciplinary Action

Every employee is expected to approach his job in a professional manner and to ensure that all people including employees, clients, and guests, have a safe and dignified experience at Ark.

The following enumerated grounds for disciplinary action are meant as illustrations of conduct which will not be condoned by Ark. This list is not all inclusive, and Ark retains the absolute right and discretion to discipline employees for conduct which may not be listed below. **All Ark employees are at will employees. Ark retains the absolute right to terminate any employee at any time, with or without notice or with or without cause.**

This list is meant for guidance so that the employee will be aware of the types of misconduct which will trigger disciplinary action:

1. Failure to perform the duties required by the position;
2. Violation or abuse of any Ark policies stated in the Employee or Client Handbooks;
3. Undue disruption and delay of any Ark service by causing either directly, or indirectly, repeated, and unnecessary disputes and arguments with fellow employees, individuals being supported, or supervisors;
4. Diminishing the morale, order, or efficiency of Ark by disruptive criticism of Ark Regional Services, personnel or policies without going through the proper channels;
5. Insubordination;
6. A conviction for a felony or any misdemeanor which may impact an employee's fitness for his position, as determined at the discretion of the President and CEO;
7. Engaging in conduct, either on or off the job, which is so offensive to reasonable standards of acceptable behavior as to bring discredit upon Ark;
8. Converting, taking, or appropriating for personal use any money or property belonging to Ark or the individual being supported;
9. Falsification of official records including time cards and client documentation;
10. Unauthorized or inappropriate disclosure of confidential client or personnel information;
11. Violation of Ark policies prohibiting discrimination and harassment;
12. Violation of Ark privacy policies and procedures;
13. Furnishing false information on an employment application or any other information provided to Ark relating to employment;
14. Abuse of the personal leave policy; excessive absences;
15. Any unexcused absence, or any unexcused tardiness;
16. Failure to attend and complete required training;
17. Reporting to work in a drug or alcohol impaired state, or being in a drug or alcohol impaired state during on-call status;
18. Failure to submit to random drug testing or testing positive for illegal drugs;
19. Mistreatment, neglect, abuse, degradation, endangerment, or exploitation of individuals supported;
20. Violation of the Ethical Code of Conduct.

Types of Disciplinary Action

Depending upon the nature, frequency, and severity of the violations involved, disciplinary action may take any of the following forms. The following list is illustrative only, and Ark reserves the discretion in every disciplinary situation to determine the appropriate disciplinary action, if any. Disciplinary action is not limited to these actions, nor is the system progressive, which means that Ark reserves the right to resort to any serious disciplinary measure without first exercising less serious disciplinary measures.

Types of disciplinary action include:

- Termination
- Suspension
- Demotion
- Reassignment
- Written warning
- Verbal reprimands

All violations of Ark's policies and procedures, as well as the disciplinary measure or measures implemented by an employee's immediate supervisor, will be documented in the employee's personnel file. **All Ark employees are at will employees. Ark retains the absolute right to terminate any employee at any time, with or without notice or with or without cause.**

The Family and Medical Leave Act (FMLA) of 1993

The Family and Medical Leave Act of 1993 requires Ark to provide up to 12 weeks of unpaid, job protected leave to eligible employees for certain family and medical reasons.

Eligible Employees: Employees are eligible if they meet the following requirements:

1. The employee has worked for Ark for a total of 12 months in the last seven years;
2. The employee has worked 1,250 hours or more in the 12 month period immediately prior to the beginning of the requested leave;
3. The employee is employed at a work site where 50 or more employees are employed by Ark within 75 miles of the employee's work site.

Qualifying Reasons for FMLA Leave: Eligible employees may take FMLA leave for any of the following reasons:

1. To care for the employee's child after birth or placement for adoption or foster care.
2. Because of the employee's serious health condition that makes the employee unable to perform the employee's job. A serious health condition is an illness, injury, impairment, or physical or mental condition that involves either an overnight stay in a medical care facility, or continuing treatment by a health care provider for a condition that prevents the employee from performing the functions of the employee's job. Subject to certain conditions, the continuing treatment requirement may be met by a period of incapacity of more than three consecutive calendar days combined with at least two visits to a health care provider or one visit and a regimen of continuing treatment, or incapacity due to pregnancy, or incapacity due to a chronic condition. Other conditions may meet the definition of continuing treatment.
3. To care for the employee's spouse, child, or parent who has a serious health condition, as defined above, which prevents the qualified family member from participating in school or other daily activities.
4. Qualifying exigencies, as defined below, arising out of the fact that the spouse, child, or parent of the employee is (a) a member of the National Guard or Reserves or is a retired military service member as defined in the FMLA regulations; and (b) on active duty, or has been notified of an impending call or order to active duty status, in support of a contingency operation. Qualifying exigencies are summarized as follows:
 - A short-notice deployment, meaning a call or order that's given no more than seven calendar days before deployment, with the employee's leave being limited to seven days beginning on the date of the notification;
 - Military events and related activities, such as official military-sponsored ceremonies and family support and assistance programs supported by the military and related to the family member's call to duty;
 - Urgent (not recurring or routine) child-care and school activities, such as arranging for child care;
 - Financial and legal tasks, such as making or updating legal arrangements to deal with the family member's active duty;
 - Counseling for the employee or his minor child that is not already covered by the FMLA;
 - Spending time with the covered service member on rest and recuperation breaks during deployment, for up to five days per break;
 - Post-deployment activities such as arrival ceremonies and reintegration briefings or to address issues from the service member's death while on active duty; and,
 - Other purposes arising out of the call to duty, as agreed on by Ark and the employee.
5. Care of a covered service member (Armed Forces, National Guard, or Reserves) who is recovering from a serious illness or injury sustained in the line of duty on active duty, under the following circumstances:
 - The service member's injury or illness may render the service member medically unfit to perform the duties of his or her office, grade, rank, or rating;

- The service member is undergoing medical treatment, recuperation, or therapy; or otherwise in outpatient status; or is on the temporary disability retired list;
- The employee is the service member's spouse, child, parent, or next of kin;
- The employee is entitled to up to 26 weeks of leave in a single 12 month period to care for the service member. This military caregiver leave is available during a single 12 month period during which an eligible employee is entitled to a combined total of 26 weeks of all types of FMLA leave.

Substitution of Paid Leave: In all cases where FMLA leave is taken, the employee must use all available accrued paid leave hours concurrently with the FMLA leave. All FMLA leave in excess of accrued paid leave hours will be unpaid leave.

Advance Notice, Medical Certification, and Reports regarding Status and Intent to Return to Work: For all foreseeable leaves, an employee will be required to provide 30 days advance notice and certification. FMLA leave may be denied or delayed if advance notice or required certifications are not provided. When leave is not foreseeable, an employee must follow Ark's notice requirements by notifying his supervisor within two hours before he is scheduled to begin his shift, absent unusual circumstances.

An employee must provide sufficient information for Ark to determine if the leave may qualify for FMLA protection and the anticipated timing and duration of the leave. Sufficient information may include the following: (a) that the employee is unable to perform the job functions (or the family member is unable to perform daily activities); (b) the need for hospitalization or continuing treatment by a health care provider, or, (c) circumstances supporting the need for military family leave. An employee must also inform Ark if the requested leave is for a reason for which FMLA leave was previously taken or certified.

A medical certification is required to support a request for a leave because of an employee's serious health condition, the serious health condition of a family member, qualifying exigency, and military caregiver leave. Ark will provide him with the necessary certification forms shortly after he requests his leave, and he must return the medical certification form within 15 calendar days of when he receives the form from Ark. Ark may also require copies of appropriate military orders or other documentation to support qualifying exigency and military caregiver leave.

If the employee is covered under Ark's group medical insurance plan, Ark will maintain the employee's health coverage during the FMLA leave period under the same conditions as if the employee had continued actively working.

Ark also requires an employee on FMLA leave to periodically update his supervisor on his status and anticipated return to work.

Fitness for Duty and Return to Work: Ark requires that any employee who takes leave for his own serious health condition provide a fitness for duty certification from his health care provider prior to returning to work that specifically addresses his ability to perform the essential functions of his job. Ark will provide him with a description of the essential functions of his job when his leave is designated as FMLA leave, and Ark may delay restoration to employment until the fitness for duty certification is provided.

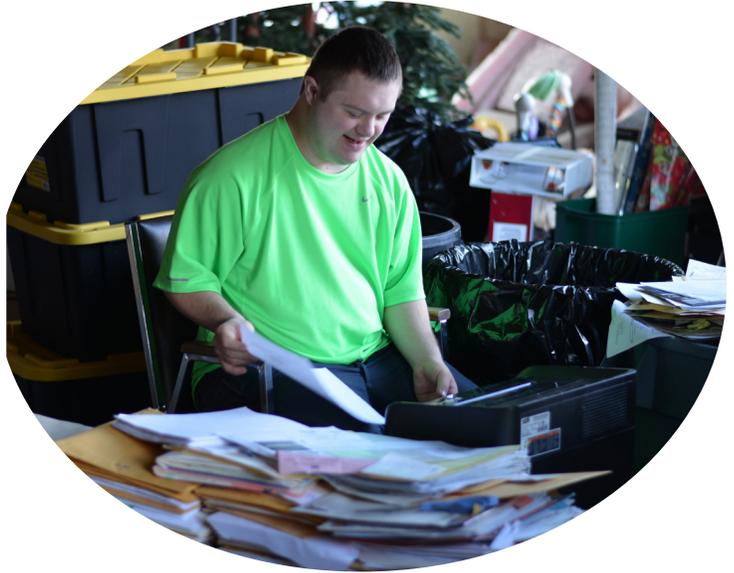
Intermittent Leave: An employee who takes leave for any qualifying reason other than the birth, adoption, or foster placement of a child does not need to use this leave entitlement in one block. Leave can be taken intermittently or on a reduced leave schedule when medically necessary. An employee must make reasonable efforts to schedule leave for planned medical treatment so as not to unduly disrupt Ark's operations. Leave due to qualifying exigencies may also be taken on an intermittent basis.

Job Benefits and Protection: If the employee is covered under Ark's group medical insurance plan, Ark will maintain the employee's health coverage during the FMLA leave period under the same conditions as if the employee had continued actively working. An employee taking FMLA leave will be guaranteed the same or equivalent position after returning from leave.

However, key employees may be exempt from FMLA reinstatement protection. An employee will be notified if he is a key employee at the time his leave is designated. Paid time off does not accrue during unpaid FMLA leave.

Ark Notice Responsibilities: Ark will notify an employee requesting leave whether he is eligible under the FMLA, and, if so, specify any additional information required as well as the employee's rights and responsibilities. In addition, Ark will notify him if leave will be designated as FMLA protected and the amount of leave counted against your leave entitlement. If he is not eligible for FMLA leave, Ark will provide a reason for the ineligibility, or if the leave is not FMLA-protected, Ark will inform him of that determination.

Prohibited Actions By Employers: FMLA makes it unlawful for employers to interfere with, restrain, or deny the exercise of any right provided under the FMLA, or discharge or discriminate against any person for opposing any practice made unlawful by FMLA or for involvement with any proceeding under or relating to FMLA. An employee may file a complaint with the U.S. Department of Labor or may bring a private lawsuit against his employer. FMLA does not affect any Federal or State law prohibiting discrimination, or supersede any State or local law or collective bargaining agreement, which provides greater family or medical leave rights.



The Reason We're Here

Policy On Rights Of Persons Served
On-Call Process
Client Handbook
Human Rights Committee
Incident Reporting
Restraint Policy and Procedure
Protocol For Shopping With People Served
Unattended Death
Notifying Persons Served Of A Death



Policy on Rights of Persons Served

Employees of Ark are responsible for protecting the rights of the individuals receiving support.

Under federal Health Insurance Portability and Accountability Act rules (HIPAA), every client and her representatives have the following rights: to access her own health information including medical and all rehabilitation services information and documentation; to restrict to whom the information is disclosed; to request amendments or changes to the information if she feels it is incorrect, to request a list of the information that has been disclosed and when it was disclosed; and to file a complaint if she feels her privacy has been violated.

Employees are to keep any and all information regarding the client and client activities strictly confidential. This means that employees are able to share medical, health, and Ark service information with the individual client, another Ark employee who is directly involved in providing services to the client, other health care providers, consultants as needed for providing treatments and/or services, or with Ark certifying or funding agencies. It is important that employees use discretion and common sense when providing such information and ensure that only pertinent information is shared and/or reported. Disclosing information with anyone other than those listed above or those who do not have written authorization, will be considered a violation of HIPAA rules and as such must be reported to the Ark Privacy Officer so that the mitigation processes can be initiated. Any member of Ark Regional Services' work force who fails to comply with the privacy policies and procedures or the requirements of the HIPAA privacy rule will be subject to disciplinary action up to and including termination.

Additionally, employees will not mistreat, neglect, abuse, degrade, intimidate, exploit, or endanger the people receiving services. This policy will cover all aspects of every service and program provided by Ark.

It is the employee's responsibility to report any incident affecting a client that is outside the normal operation of Ark. Employees should follow Ark Incident Reporting Procedures as outlined in this handbook.

Unless otherwise approved by the President and CEO, it is against Ark policy for employees to sell items to and/or buy items from clients. It is up to the employee's discretion whether to participate in community or other non-profit organizational raffles or donations.

On-Call

The Client Services Manager (CSM) is the first line of support that an employee should call if she has concerns or questions. If an employee is unable to contact the CSM, she may call the person on-call. The person on-call is there to help the employee problem solve, trouble shoot, and assist with client emergencies. If the situation is potentially life threatening the employee should call 911 before calling on-call.

The on-call pool is made up of employees identified as having appropriate problem solving skills and philosophical and organizational knowledge.

The person on-call must be available at all times and answer every call; therefore, the person on-call cannot cover shifts. However, they treat every call as if it were an emergency...to the employee it may be just that. They respond to every caller professionally and courteously and make a personal visit to the location when concerns warrant it.

The person on-call will have immediate access to all emergency information for all of the people served via an electronic medium. Whenever people are out of their homes and employees need access to person specific information they should call the person on-call to get it.

If an employee utilizes a personal camera, cell phone, or other device to capture an image of a client, those photos are protected by the individual's Photograph Release form and can only be used in the manner outlined in the release.

The Client Services Manager (CSM) is the first line of support that an employee should call if she has concerns or questions. If an employee is unable to contact the CSM, she may call the person on-call.

Client Handbook

Each person served at Ark Regional Services receives a handbook of rights and responsibilities. Each employee should read and become familiar with the rights and responsibilities of the person served.

Human Rights Committee

The purpose of Ark's Human Rights Committee is to assure oversight and accountability to the inherent human rights of the people receiving support. The committee will seek the most appropriate and least restrictive interventions to support people to live, learn, work, and play in their community.

Ark's Human Rights Committee will be comprised of the following members:

- Program Integrity Manager - serves as Chair of committee
- President and CEO
- Vice President - Support Services
- Vice President - Community Resources
- Two at large positions

(The at large positions are appointed by the President and CEO and will serve for two years)

The specific functions of Ark's Human Rights Committee are to:

- Review and approve any restrictions of human rights prior to implementation.
- Review and approve all Positive Action Plans and Effective Techniques prior to implementation.
- Review and approve any suggested changes to existing Positive Action Plans and Effective Techniques prior to implementation.
- Review all General Event Reports and make recommendations for more effective interventions in the future.
- On a monthly basis review all General Event Reports to monitor for trends and needed changes to support.
- Attend and participate in individual team meetings as requested.
- Provide support and assistance in determining the function of difficult behavior and work with teams to develop positive interventions that are effective.

Incident Reporting

An incident is an occurrence which is not within the normal operation of the organization. This includes unusual behaviors for an individual, use of restraint, HIPAA violation, serious illness or injury, accident, and any items from the table below.

The following general reporting procedures should be followed when an incident occurs:

1. Assess the situation, remove the person from any immediate threat or danger, and check for injury. Administer first aid or seek medical attention as needed.
2. Once a situation has stabilized, complete a General Event Report (GER) through Therap for each person involved, or complete a blue Incident Report form (if applicable). Use the first and last names of people, not titles (i.e. don't write "on-call," "staff," "my supervisor").
3. An employee is required to review the incident report with her supervisor immediately. If an employee's supervisor is unavailable, she should inform the person on-call or the next available person in her chain of command.
4. If at any time the person an employee would normally contact is the person suspected of abuse, neglect, abandonment, or exploitation, she should contact the next available person in the appropriate chain of command.
5. Once the GER is submitted, the supervisor, CSM, or person on-call will submit a critical incident to appropriate parties. On occasion the person reporting may be requested to contact outside entities.

An incident is an occurrence which is not within the normal operation of the agency, including unusual behaviors for an individual, use of restraint, HIPAA violation, serious illness or injury, or accident.

Critical Incident To Whom it is Reported

Types of Incidents	Who Gets Notified
Suspected abuse Suspected self-abuse Suspected neglect Suspected self-neglect Suspected exploitation Suspected abandonment Intimidation Sexual Abuse Death	<ul style="list-style-type: none"> • Wyoming Behavioral Health Division – Developmental Disabilities Section • Department of Family Services – (DFS) • Protection and Advocacy – (P&A) • Case Manager • Guardian • Local Law Enforcement Agency
Serious Injury Elopement Crime Committed by Participant Injuries Caused by Restraint	<ul style="list-style-type: none"> • Wyoming Behavioral Health Division – Developmental Disabilities Section • Protection and Advocacy – (P&A) • Case Manager • Guardian • Local Law Enforcement Agency (if applicable)
Police Involvement	<ul style="list-style-type: none"> • Wyoming Behavioral Health Division – Developmental Disabilities Section • Protection and Advocacy – (P&A) • Case Manager • Guardian
Medical/Behavioral Admission Emergency Use of Restraint	<ul style="list-style-type: none"> • Wyoming Behavioral Health Division – Developmental Disabilities Section • Case Manager • Guardian
Medication Error	<ul style="list-style-type: none"> • Wyoming Behavioral Health Division – Developmental Disabilities Section • Case Manager

Instructions for reporting to Protection and Advocacy:

Send an email to wypanda@wypanda.com. In the subject line put the state incident report number. In the body of the email state your name and say that you are from Ark Regional Services in Laramie, WY. Say that you are attaching a reportable incident for their review. Then attach the state report to the email and send the email.

Instructions for calling the Department of Family Services (745-7324): When the recording begins, press 0 to get the receptionist, and ask for an intake worker. An employee should identify herself as an Ark employee and tell them she needs to report an incident. Answer that person’s questions, and then document his name, the date, and time on the GER. Follow any instructions given. On weekends and evenings an employee will get a machine. An employee should identify herself as an Ark employee and leave her name and where she can be reached during the next business day. On the GER, document the time of the message and that it was a machine contact.

Instructions for calling the Laramie Police Department Non Emergency Phone Number (721-2526): An employee should identify herself as an Ark employee and say that she needs to report a crime involving a person with a developmental disability. Give the person's permanent address as 1150 N. 3rd, and be prepared to give the person's date of birth. Document the contact, date, and time. The LPD will send an officer to talk with any witnesses and the people involved. The employee will get a business card from the officer with a case number on the back. Enter the case number and other pertinent facts or information in the GER summary.

DEFINITIONS:

Incident - Any occurrence which is not within the normal operation of the organization, including serious illness or injury, accident, use of physical restraints, HIPAA violation, police involvement, unusual behaviors for an individual, and any of the Division (BHD) reportable categories listed below.

Wandering – An occurrence where an individual has left the premises without necessary supports as outlined in their plan of care.

Emergency Use of Restraint - An unplanned event where a restraint was used to restrain a person receiving services.

- **Physical Restraint** - The application of physical force or physical presence without the use of any device, for the purpose of manually restricting free movement of the body of the person. (This does not include brief holding to calm or comfort or safely escorting them from one area to another.)
- **Mechanical Restraint** - Any device attached or adjacent to a person's body that he or she cannot easily move or remove that restricts freedom of movement or normal access to the body.
- **Chemical Restraint** - The use of a psychotropic medication given against a person's will in an attempt to exert control over a person's behavior.

Injuries Caused by Restraint - Injuries caused by restraints, including drugs used as restraints, physical restraints, and mechanical restraints. (Drug as a restraint is prohibited.)

Suspected Abuse - Abuse is the intentional or reckless infliction, by the vulnerable adult's caregiver, family member, or other individual of: injury, unreasonable confinement which threatens the welfare and well-being of a vulnerable adult; or intimidation or cruel punishment with resulting physical or emotional harm, or pain to a vulnerable individual (W.S. 35-20-102). This also includes sexual abuse defined as non-consensual sexual sodomy, sexual exploitation, and sexual photography.

Abuse with respect to child means inflicting or causing physical or mental injury, harm, or imminent danger to the physical or mental health or welfare of a child other than by accidental means, including abandonment, excessive or unreasonable corporal punishment, malnutrition, or substantial risk thereof by reason of intentional or unintentional neglect, and the commission or allowing the commission of a sexual offense against a child as defined by law (W.S. 14-3-202).

Suspected Self-Abuse – Self-Abuse is characterized as abuse (intentionally or recklessly inflicting physical or mental injury, unreasonable confinement, intimidation, cruel punishment, and may include sexual offenses) inflicted by self.

Suspected Neglect - Neglect means the deprivation of or failure to provide the minimum food, shelter, clothing, supervision, physical and mental health care, and other care necessary to maintain a vulnerable adult's life or health, or which may result in a life-threatening situation (W.S. 35-20-102). Neglect with respect to a child means a failure or refusal by those responsible for the child's welfare to provide adequate care, food, clothing, safe shelter, maintenance, supervision, guidance, education or medical, surgical or any other care necessary for the child's well-being (W.S. 14-3-202).

Suspected Self Neglect - Self neglect means that the vulnerable adult is unable to, due to physical or mental disability, or refuses to perform essential self-care tasks, including obtaining essential food, clothing, shelter, or medical care, obtaining goods and services necessary to maintain physical health, mental health, emotional well-being and general safety, or managing financial affairs (W.S. 35-20-102).

Suspected Exploitation - Exploitation is defined as the reckless or intentional act taken by any person, or any use of the power of attorney, conservatorship, or guardianship of a vulnerable adult, to obtain control through deception, harassment, intimidation, or undue influence over the vulnerable adult's money, assets, property with intention of permanently or temporarily depriving the vulnerable adult of the ownership, use, benefit or possession of his money, assets, or property (W.S. 35-2-102).

Suspected Abandonment - Abandonment is defined as leaving a vulnerable adult without financial support or the means or ability to obtain food, shelter, clothing, or health care (W.S. 35-2-103) Abandonment means the child has been left without obvious behavioral, verbal, or written intentions of reclaiming the child (W.S. 14-3-202).

Sexual Abuse - Sexual abuse means sexual contact including, but not limited to, unwanted touching, all types of sexual assault or batter as defined in W.S. 6-2-302 through 6-2-304, sexual exploitation and sexual photographing.

Death – Participant death due to any cause.

Elopement - The unexpected or unauthorized absence of an individual for more than four hours when that person is receiving waiver services or the unexpected or unauthorized absence of any duration.

Intimidation - The communication by word or act to a vulnerable adult that he, his family, friends, or pets will be deprived of food, shelter, clothing, supervision, prescribed medication, physical or mental health care, and other medical care necessary to maintain a vulnerable adult's health, financial support, or imply that they will suffer physical violence.

Crime Committed by Participant – Crime as defined by the Wyoming Criminal Code.

Police Involvement – Any accident that results in police involvement with people receiving services, including but not limited to arrests, questioning by law enforcement, or police calls to the person's home or service delivery site.

Serious Injury – An injury, such as suspected fractures, wounds requiring stitches, or injuries due to falls, which require an emergency room visit, hospital visit, or non-routine visit to a doctor or clinic.

Medical/Behavioral Admission – Person was admitted to a medical or behavioral care facility for additional treatment, i.e. Urgent Care, E.R. (unscheduled), or hospital visit (in-patient).

Medication Error – An event where a person is given: (1) the wrong medication, (2) the wrong dosage, (3) medication which should have gone to a different person, (4) medication via an incorrect delivery route, or (5) medication at the wrong time (by an hour or more from the scheduled time).

Use of Seclusion or Coercion

Involuntary seclusion is the act of shutting a person out or keeping a person apart from the rest of society. Coercion is the use of force or intimidation to obtain compliance. Ark Regional Services does not believe in the use coercion or seclusion and these practices are prohibited as part of supports provided to people receiving services. Ark Regional Services uses The Mandt System® as a crisis intervention strategy, and will use restraint as a last resort ONLY if the safety of people is a risk.

Emergency use of Restraint

Ark will use the Mandt System® as the approved crisis intervention method. All employees working directly with persons served will be trained and certified in this system. All employees certified in the Mandt System® are trained to identify situations in which the use of a physical restraint is an appropriate response. All certified employees will adhere to the teachings and philosophies of the Mandt System®. If a situation escalates beyond a person's ability to manage the situation and keep the person, themselves, and bystanders safe, law enforcement and/or emergency personnel may be summoned.

It is the policy of Ark Regional Services to use emergency intervention procedures only in response to assault, physical aggression towards others, and self injurious behavior. These procedures will outline if and when restraint, including physical, mechanical, and chemical restraint, will be used within Ark's programs.

Physical Restraint - The application of physical force or physical presence without the use of any device, for the purpose of manually restricting free movement of the body of the person. The term physical restraint does not include briefly holding without undue force of a person in order to calm or comfort her or safely escorting the person from one area to another as outlined in the Mandt System®.

Chemical Restraint - The use of a psychotropic medication given against a person's will in an attempt to exert control over a person's behavior. The use of Chemical Restraint by Ark staff is prohibited, and Ark does not incorporate Chemical Restraints as part of its emergency response procedures.

Mechanical Restraint - Any device attached or adjacent to a person's body that he or she cannot easily move or remove that restricts freedom of movement or normal access to the body. The use of Mechanical Restraint by Ark staff is prohibited, and Ark does not incorporate Mechanical Restraints as part of its emergency response procedures.

If it is deemed appropriate and necessary to include restrictive interventions into the persons plan, Ark will work with the case manager and guardian to write a Restrictive Intervention Protocol that meets the rules outlined in Chapter 45, Section 18 of the Wyoming Department of Health Medicaid Rules.

The use of restraints shall always be documented using Ark's Incident Reporting process and reviewed for appropriateness. Recommendations for modifications to individual plans and/or additional follow up will be made as applicable.

In adherence to Ark's policy on restraints, the following procedures have been established to ensure restraints are used appropriately, documented correctly, and reviewed consistently. Questions regarding these procedures should be directed to department supervisors or Ark's Leadership Team.

1. Ark uses the Mandt System® as the approved crisis intervention method. All employees working directly with persons served will be trained and certified in this system within 30 days of hire and annually thereafter.
2. Employees certified in the Mandt System® are trained to identify situations in which the use of physical restraint is warranted and will adhere to these teachings and philosophies, including but not limited to:
 - Treating people with dignity and respect at all times.
 - Using proactive interaction and other non-physical techniques to manage or deescalate situations when possible.
 - Ensuring the safety of all involved if the use of a restraint becomes necessary.
 - Releasing the restraint immediately once it is safe to do so.
 - Never using restraint as a means of coercion, discipline, convenience, or retaliation.
3. All restraints shall be documented using Ark's Incident Reporting (IR) procedure. A General Event Report (GER) will be submitted and will include documentation of non restrictive intervention techniques that were used prior to the restraint being used.

4. If a situation escalates beyond an employee's ability to manage the situation and keep the person, themselves, and bystanders safe, law enforcement and/or emergency personnel may be summoned.
5. When a restraint is used, the following steps will be taken:
 - The department supervisor or person on-call will be notified immediately after the use of a restraint.
 - A face to face evaluation by the supervisor or person on-call of the person restrained will occur within one hour of the use of the restraint and be documented on the GER.
 - If the person served sustains an injury during the use of a restraint, medical attention will be sought. Ark's IR procedure will be used to notify the Behavioral Health Division. Their procedure for reportable incidents will be followed.
 - The person's case manager will be notified about the restraint within (3) business days.
 - A GER will be completed using Ark's IR procedure and should contain the following information:
 - Person(s) involved
 - Employee initiating the restraint
 - Other witnesses to the event
 - The incident
 - Antecedents to the event
 - Less restrictive intervention techniques used prior to the restraint
 - The reason for the use of the restraint
 - Person's reaction to the restraint
6. The Program Integrity Manager shall review the GER within one working day per Ark's IR procedures. A designated Mandt System® instructor will follow up, as needed, with the employee that used the restraint within three working days. When deemed necessary, the employee will be asked to attend the next Human Rights Committee meeting to discuss the situation.
7. The President and CEO or his designee will review the restraint to ensure all internal procedures were followed.
8. The Human Rights Committee will meet regularly (typically monthly) to discuss any uses of restraint. The GER will be reviewed and any follow-up deemed appropriate will be documented in the Human Rights Committee meeting notes. When applicable, recommendations to the behavior support plans and/or IPC will be made and documented on the GER or in the Human Rights meeting notes.
9. As with all incidents, all uses of restraint shall be analyzed on a monthly, quarterly and semi-annual basis. Trends will be reviewed, and as appropriate, recommendations to reduce the use of restraint will be made.

Clinical Holding Policy

Clinical Holding is the use of restrictive physical interventions that enable staff and/or medical professionals to effectively assess and/or deliver clinical care, treatment, or support to individuals who are unable or unwilling to comply. Clinical holding may be defined as the proactive holding of part of the body to allow a procedure to be carried out. In all cases, the implementation of restrictive physical interventions should only be used when all other less restrictive options have proven ineffective and the procedure or support is deemed absolutely essential for the health and safety of the person. Before the use of any restrictive physical intervention, Ark will complete an assessment using the following criteria:

Benefit – any action or decision must be beneficial to the person and must only be taken when the benefit cannot be achieved without it.

Least restrictive option – any action or decision taken should be the minimum necessary to achieve the purpose and should restrict the person’s movement as little as possible for the shortest time possible.

The person’s choice – the past and present opinions and feelings of the person should be taken into account as much as possible, and the person must be offered help in communicating their opinions and choices.

Consultation with others – the views of others with an interest in the person’s welfare should be taken into account, as far as it is reasonable to do so. This may include the person’s primary care physician, other medical professionals, the person’s team, Ark’s Human Rights Committee, and/or close friends or relatives. **Please note: If the person has a guardian, the guardian must approve any use of restrictive physical interventions prior to implementation. This consent must be appropriately documented.**

Enhancing skills and abilities – if the use of restrictive physical interventions was deemed necessary in the past, it should not be assumed that this person will always require this intervention. The person should be provided the opportunity to demonstrate existing skills and develop new skills which may result in the person not needing this intervention in the future.

Approval

The results of the assessment should be well documented, and this information must be provided to Ark’s President and CEO, including documentation of consent from the person’s guardian, if appropriate. The President and CEO must approve any use of clinical holding that is implemented by Ark staff.

Required Training

All employees are responsible for ensuring that clinical holding takes place in a safe and appropriate manner in accordance with this Policy. Any person involved in the implementation of restrictive physical interventions must be certified in the technical aspects of the Mandt System® and observe the Prohibited Practices outlined in Mandt. It is important to note that restrictive physical interventions for medical purposes and immobilization are not approved by Mandt, but Ark staff will utilize the physical skills taught through the Mandt System® as the basis for clinical holding.

The clinical holding techniques used will be determined on a case by case basis. These will be developed using the Mandt System® as a guide. The President and CEO will designate the person or persons who will develop and train on the specific technique to be used in each case. In all circumstances at least one Mandt System® certified instructor will be involved in this process.

Documentation

The use of clinical holding must be fully documented. A General Event Record (GER) must be submitted on Therap® and outside agencies must be notified as appropriate.

Shopping With People Served

Shopping trips may require the use of a check or debit card for client purchases. In limited and rare instances, cash may be used (weekend spending, garage sales, etc.) as determined by the Accounting Services Specialist. All methods of spending will follow this protocol.

1. A Client Money Request Form needs to be completed for any items that the person should request/need, with the exception of Supported Living grocery shopping. The request forms are located at the front office or on the desktop of computers at work locations.
2. Once the Client Money Request Form has been completed, it should be given to the Accounting Services Specialist for approval. Money requests must be submitted by noon the day before it is needed. Money requests for the weekend must be submitted no later than noon on Thursday. Incomplete forms will not be processed and will be returned to the appropriate supervisor. This will delay processing.
 - Big ticket items such as TV's and furniture must have the prior approval of the President and CEO.
 - There are only two debit cards per client, so an employee may still receive a check for purchases. It is required that an employee indicate the store where the shopping will take place.
3. After the request has been approved, the Accounting Services Specialist will issue a debit card or check and give it to the appropriate employee to assist the person in shopping. The employee's name must appear on the request form, as well as the name of the group home or Supported Living location and the shopping location name.
4. All debit cards and checks are distributed under the name of the employee who made the request. The Accounting Services Specialist shall note the name of the employee who is responsible for the check on the check stub.
5. Assist the individual with shopping. Emphasis should be on the individual determining what she needs, can afford, personal preference, and paying for the items. Assistance should be given to the individual in guiding her towards the appropriate items when necessary.
 - An employee is required to take the check or debit card and Client Money Request Form while shopping. Shopping must be done with the individual present; should she refuse, see the President & CEO
6. Debit cards and checks are issued on a 24-hour basis and shopping must be completed within that time. Should circumstances arise that prohibit this, then speak with the Accounting Services Specialist immediately. Debit cards must be returned promptly so debit transaction requests from other departments or service areas can also take place.

Note: Each client who has a debit card has only two cards. If the purchase does not take place within that period of time, an employee must contact Account Services to make arrangements to keep the card longer or request it be re-issued at a later date.
7. Debit card transactions are to be initiated as a credit purchase. No personal identification number (PIN) is assigned to the card.
8. Debit cards and checks are to be used ONLY for the purpose and amount that was requested and approved. It is imperative the purchase does not exceed the amount approved.
9. Obtain a receipt from the purchase. Write the name of the person served and the check number on the receipt. If a debit card is used, write the name of the person served, the last four digits of the debit card, and any server tip on the receipt. Clients should tip servers as any patron would (customary 15-20%) Place all receipts and any change in the bag and return to the Accounting Services Specialist. All change must be returned.
10. If a receipt is not provided with the purchase (i.e.-bazaar, carnival), the employee should hand write a receipt with the purchase details to turn in. All monies must be accounted for.
11. All items should go to the client's home. The Lead Staff shall label the purchased items and add them to the "Client Personal Inventory" List. If an item includes a warranty, give that information to the Accounting Services Specialist.

12. If an employee needs to void a check, write "VOID" across the check and return it to the Accounting Services Specialist. **Do not throw away checks or tear them up if a mistake is made in writing the check.**
13. All checks require two signatures. When the check requested is received, it should have the signature of the President and CEO, Vice President of Finance, or Vice President of Maintenance and Technology. When the purchase is made, the person served should sign next to the first signature. The check isn't valid until both signatures are present. If an employee receives a check without a signature of the President and CEO, Vice President of Finance, or Vice President of Technology, please return it to the Accounting Services Specialist so the signature can be obtained.
14. Online Purchases – Online shopping should be only for items that cannot be purchased in person. This should not replace the in-store shopping experience. Do not save the client's debit card information on the computer or website. Do not use an employee's personal account to complete a purchase for the client. Enter transactions as a guest user on the retailer's website.
15. With few exceptions, clients should be with employees when cashing the check at ACPE. The person should be going inside, and an employee needs to have his Ark ID with them to identify themselves. The client should be present and participating in all of her purchases.
16. All debit card use requires a Money Request Form approval by the Accounting Services Specialist and initialed by the President and CEO, Vice President of Finance, or Vice President of Maintenance and Technology. Debit card receipts must be signed by the client.
17. Debit cards are issued with a pre-approved spending total. If an employee goes over the designated amount, the transaction will be declined. Do not exceed the approved amount. If the debit card does not work, please call the Accounting Services Specialist or person on-call if after regular business hours. An employee is prohibited from using his personal account to complete the purchase unless it is an extreme necessity. Employee reimbursement requests for such occurrences should be rare and will be highly scrutinized.
18. Dining Out with Person Served – While accompanying the person served at a restaurant, adhere to the following: Employees ordering meals must keep the cost to \$10 or less, including the beverage. Anything over \$10 must be paid by the employee. Please remember that eating out is for the benefit of the person receiving services and not for the benefit of the employee. When assisting a person in paying her bill, remember to help her leave an appropriate tip (15% at lunch, 20% at dinner).
19. Return the money bag, which should include the Money Request Form, the receipt with the name of the person served, and checks number noted, change, debit card, and/or any check(s) not used to the Accounting Services Specialist. If she isn't available, return the bag to the receptionist or any employee in the administrative hallway. Do not leave bags with change or debit cards in in-boxes or mailboxes.
20. Ark is legally responsible for the money of the people receiving services; therefore, all employees must maintain accurate records of how people's money is spent. It is important that all receipts from purchases and any change received are turned in.

***** IMPORTANT *****

The Spending Request Form and receipt are the only records of the amount of the transaction and for whom the transaction was made. Therefore, a employees must return the request and receipt to the Accounting Services Specialist. Also, should an employee allow spending in excess of the approved amount and cause a check to be returned for insufficient funds, or a debit card transaction results in a person's account being overdrawn, the employee will be held accountable for all charges that are incurred. Please take extra caution when assisting people with their funds.

Unattended Death

In the event of a suspected death of a person receiving services the employee should follow the following steps:

1. Call an ambulance (911)
2. Perform CPR
3. Once EMS arrives, call the Client Services Manager or immediate supervisor
4. Call the person on-call if the CSM or immediate supervisor is not available
5. The President and CEO must be notified as soon as it is reasonable to do so. The President and CEO will ensure the parents and/or guardians and the Case Manger are contacted upon recommendation of the hospital or law enforcement.

Things to remember:

- Do not touch anything in the immediate area.
- Close off the area.
- An employee should note and document the time he first noticed something was wrong and the details of what he observed.

All employees will cooperate as needed in arrangements for removal, transporting, etc. of the body. Prior to the removal of the body, an employee will inform persons transporting the body of any known communicable diseases and note any personal effects removed with the body (jewelry, glasses, etc).

After removal of the body, any soiled laundry shall be cleaned and returned to the person's inventory. The room or apartment will then be locked until the guardian instructs Ark on how to handle the personal effects.

All employees present at the time of death or preceding shifts, if appropriate, will complete written statements regarding their interactions with the deceased. The appropriate employee shall document the incident and follow the incident reporting procedure to notify the appropriate parties.

Notifying Persons Served Of A Death

The death of a friend is difficult for people to process. It is important that this news be shared so that the person can understand, grieve, and be supported. In the event of the death of a client, employee, or someone important in the client's life, the President and CEO and/or the person's team will determine the best way to notify clients. Employees will honor the decision of the team and be available to support the clients as needed.

