ADAPT
PERSONNEL POLICIES

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Titles and Headings

Titles and Headings of sections or paragraphs are inserted for convenience of reference only and are not intended to affect the interpretation or construction of this document.

Welcome and Introductory Statement

Welcome, we are pleased you have chosen to work at ADAPT. The work you will perform and the impact you will have on the people we serve is especially important. You are now part of a vast network of people who have been a part of Adapt's rich 50+ year history. Please take time to read these policies carefully. The policies give you information about your rights and responsibilities as an ADAPT employee, as well as information regarding the general operation of ADAPT programs and departments. If you have any questions at any time about the information contained in these policies (or any other issues), please contact your supervisor. Personnel policies provide structure and consistency, which promote stability and fairness for all employees. All employees are expected to follow the policies, including supervisors and administrators. Ignorance of company policies and procedures does not excuse violations of them.

This handbook is designed to acquaint you with ADAPT, Inc. and provides you with information about working conditions, employee benefits, and some of the policies affecting your employment. You should read, understand, and comply with all provisions of the handbook. It describes many of your responsibilities as an employee and outlines the programs developed by the company to benefit employees. One of our objectives is to provide a work environment that is conducive to both personal and professional growth.

No employee handbook can anticipate every circumstance or question about policy. The need may arise, and management reserves the right to revise, supplement, or rescind any policies or portion of the handbook from time to time as it deems appropriate, in its sole and absolute discretion. **The only exception to any changes is our Employment-At-Will policy permitting you or the company to end our relationship for any reason at any time.**

Purpose

The purpose of ADAPT is to provide Residential services, Community Living Supports (CLS) Services, Work experiences, and other opportunities for individuals with developmental/intellectual disabilities and/or chronic mental health issues. It is the intention of this organization to promote the highest degree of community integration, personal growth, and self-sufficiency possible based upon the personal choices and preferences for each person served by ADAPT.

I. GENERAL

Personnel Policies

- ◊ These policies apply to all employees of ADAPT, Inc.
- ◊ The development of policies is the responsibility of the Executive Director or Designee. Such policies shall be subject to review by the Board. All policy statements will be distributed to each employee.
- ◊ Whenever there is a disagreement between a member of the staff and their supervisor over the interpretation of a personnel policy, it is to be presented to the Executive Director.
- ◊ These policies are only meant to serve as a reference guide. The Policies and Benefits described are not conditions of employment, and do not reflect a contract between the employer and the employee. The employer reserves the unilateral right to add, delete, or amend the policies and benefits provided for in these policies.
- ◊ A copy of ADAPT'S Personnel Policies will be given to each new employee. Additional copies will be readily available to all employees. Employees will be notified of such changes to the handbook as they occur.

Leadership

ADAPT is governed by a Board of Directors. This Board employs an Executive Director for the effective operation and growth of ADAPT'S programs. In delegating such authority, the Board realizes that effective programming is related to adequate state, federal, and local funding. The Board of Directors, with the Executive Director, has the responsibility of providing effective leadership for ADAPT in pursuing its

mission, through planning, fiscal direction, and policy oversight. The Board generally operates as a committee of the whole, but as the need arises, may appoint special committees.

Board Rotation

The Board of Directors recognizes the importance of bringing fresh board members to the organization. The board shall encourage the addition of new members but also recognizes the importance of long-term dedication and commitment by board members. The board has determined that a small (6-10) board is most effective for ADAPT. Therefore, the frequent turnover of board members is neither possible nor desired.

Board Education - Reimbursement

Since an informed and aware Board of Directors is essential to the efficient operation of ADAPT, the practice of Board education is an ongoing endeavor. New board members shall receive orientation, to include the purpose, history, programs, statistics, and current activities of the organization. Ongoing board education will include, but not be limited to, verbal reports by staff members concerning their responsibilities and duties, reports by the Executive Director concerning various phases of intake, financial reports, staff training, etc. Scheduled agency visits by Board and community members will be encouraged. Board members shall be encouraged to attend conferences and seminars as they relate to their involvement with ADAPT. Any expenses incurred with regard to those activities, including mileage, shall be reimbursed. Board members will receive compensation for participating in board meetings.

Board Member Code of Ethics

All individuals, including board members, employees, persons receiving services, stakeholders, and the community at large should be treated with dignity and respect. Board members should remain constantly aware that they act as role models for employees and consumers, and their conduct reflects ADAPT. Their honesty and integrity must be of the highest level. Board members are expected to adhere to the same standards of conduct as employees related to their role on the board, as specified in the Personnel Policies:

Conflict of Interest - Any time a potential conflict of interest exists between a Board Member and ADAPT, it shall be the responsibility of that Board member to disclose that conflict prior to any Board action. The Board of Directors will then decide if that member should be limited or excluded from participating in discussions or voting on the issue in question.

Alleged violations of codes of ethical conduct by an employee will be handled as described in the Personnel Policies. When the allegations relate to the treatment of persons served, the procedures of the Office of Recipient Rights will be followed, as described in the Rights Policies. A special committee of the Board or the relevant outside authority will handle allegations of unethical conduct by Board members, where applicable. Substantiated violations may result in dismissal from the Board of Directors or other action commensurate with the violation. Strict confidentiality shall be maintained during any investigation, and for all records of the allegation and investigation.

All Board Members complete a *Conflict-of-Interest Statement, Code of Conduct Statement,* and *A Board Self-Assessment,* annually.

Development and Evaluation of Executive Leadership

The Executive Director's performance will be reviewed annually by the Board of Directors, led by the Executive Committee consisting of the Board President, Vice-President, and Secretary. The Board will evaluate the overall organizational performance versus goals identified for the previous year, the Executive Director's individual achievement of goals including areas of growth and accomplishment, as well as additional opportunities for professional development. The Board will present the Executive Director with an annual written evaluation based on the Directors' job description. Assessment of the Executive Director's performance and the health of the organization is also conducted during regular Board Meetings. The Executive Director will also keep the Board informed of the status of the agency through emails, phone calls, etc., as needed between meetings. Open and frequent communication between the Executive Director and Board Members is key to promoting the overall success of ADAPT. Additionally, the

organization has a Succession Plan in the event that the current Executive Director is unable to perform the duties necessary for effective leadership of ADAPT.

Executive Compensation

ADAPT provides many services in Branch and St. Joseph Counties and has a multimillion-dollar annual operating budget. The Executive Director will be compensated at a level that is competitive with other organizations of similar size and resources. The Board of Directors will consist of members who are unrelated to the Executive Director and present no conflict of interest in ensuring objectivity when determining Executive compensation. The Board will consider cost of living, market comparator data, the financial health of the organization, merit, professional experience, and changes in Executive responsibility.

Executive Compensation will include base pay, benefit plans, incentive plans, and other perquisites, to be determined annually. Bonuses may be awarded to the Executive Director but are not guaranteed. The Executive Director will provide the Board President a salary history, a summary of achievements, changes in levels of responsibility, challenges the organization is facing, and any other requested records or data. The Board President discusses compensation with the Executive Committee, and the decision about compensation is made by the full Board at the Board meeting held nearest to the Executive Director's annual evaluation. The terms of the compensation arrangements will be documented and include an approval date, the names of the Board committee members approving the arrangement, and any potential conflicts of interest that may have arisen. The Board of Directors has full authority to make decisions and act regarding Executive Compensation.

Human Resources

Because the quality of ADAPT's employees is the organization's most important asset, ADAPT will endeavor to recruit, train, and retain individuals who are committed to meeting the needs of persons with disabilities, and who have skills which assist in achieving ADAPT's mission. This includes a commitment to secure employees with suitable qualifications, experience, and education, to enable them to carry out their responsibilities, as set forth in their job descriptions. The organization seeks to provide needed support, supervision, training, and opportunities for professional growth to enable employees to reach their performance objectives.

All employees will receive upon, or prior to their employment, a copy of the Board approved Policy and Procedure Handbook. Each employee will be given an opportunity to thoroughly read the document prior to the acceptance of employment. The Policy and Procedure Handbook will be reviewed periodically.

At-Will Status of Employment

The employee/employer relationship is "at-will." This means that at the sole discretion of either the employer or the employee, the relationship may be terminated with or without cause and with or without notice. Personnel practices, including the right to hire, assign, transfer, suspend or discharge, to relieve employees from duty and to maintain discipline and efficiency of employees, rest exclusively in the sole discretion of the employer. The employer may introduce new administrative methods and job requirements as changing needs indicate. Nothing in these policies operates to change the status of the employee from at-will to other status. All disciplinary provisions in this manual are advisory. The employer reserves the right to terminate any employee at the sole discretion of the employer. Any representations that change the employee status from at-will employment status must be in writing and must be signed by the Executive Director. Any other purported changes in the at-will nature of the employment arrangement are without any effect. Employees acknowledge and certify that no oral statements or promises of employment beyond the at-will policy of the employer were made prior to or relied upon by employee prior to hire.

Equal Opportunity Employment

In order to provide equal employment and advancement opportunities to all individuals, employment decisions will be based on merit, qualifications, and abilities. Adapt does not discriminate in employment opportunities or practices on the basis of race, color, religion, sex/gender identification, sexual orientation, national origin, age, disability, genetic information, or any other characteristic protected by law.

Any employee with questions or concerns about any type of discrimination in the workplace is encouraged to bring these issues to the attention of their immediate supervisor or the Executive Director. Employees can raise concerns and make reports without fear of reprisal. Anyone found to be engaging in any type of unlawful discrimination will be subject to corrective action, according to the company policy.

Disability Accommodation/Staff Recruitment

We are committed to complying with all applicable provisions of the Americans with Disabilities Act ("ADA"). It is our policy not to discriminate against any qualified employee or applicant with regard to any terms or conditions of employment because of such individual's disability or perceived disability so long as the employee can perform the essential functions of the job. Consistent with this policy of nondiscrimination, we will provide reasonable accommodations for a qualified individual with a disability, as defined by the ADA, who has made the company aware of his or her disability, provided that such accommodation does not constitute an undue hardship.

Employees with a disability who believe they need reasonable accommodation to perform the essential functions of their job should contact the Human Resources Coordinator. We encourage individuals with disabilities to come forward and request reasonable accommodation.

We will determine the feasibility of the requested accommodation considering various factors, including, but not limited to the nature and cost of the accommodation, the availability of tax credits and deductions, outside funding, the company's overall financial resources and organization, and the accommodation's impact on the operation of the company, including its impact on the ability of other employees to perform their duties and on the company's ability to conduct business. The ADA does not require us to make the best possible accommodation, to reallocate essential job functions, or to provide personal use items (i.e., eyeglasses, hearing aids, wheelchairs etc.). Postings detailing the law shall be displayed at each ADAPT location.

An employee or job applicant who has questions regarding this policy or believes that he or she has been discriminated against based on a disability should notify the Human Resources Coordinator. All such inquiries or complaints will be treated as confidential to the extent permissible by law.

ADAPT will make reasonable efforts to employ staff persons and recruit Board members who have disabilities. All architectural barriers that would prevent such participation shall be removed. Reasonable accommodations shall be made which enable persons with disabilities to serve as staff, volunteers, or Board members. The Board and the Executive Director shall also make attempts to obtain capable employees and board members who have disabilities and promote a positive and functional image of people with disabilities throughout the community.

Business Ethics and Conduct

The successful business operation and reputation of ADAPT, Inc. is built upon the principles of fair dealing and ethical conduct of our employees. Our reputation for integrity and excellence requires careful observance of the spirit and letter of all applicable laws and regulations, as well as a scrupulous regard for the highest standards of conduct and personal integrity.

Our continued success is dependent upon our customers' trust, and we are dedicated to preserving that trust. Employees have a duty to the company, its customers, and shareholders to act in a way that will merit the continued trust and confidence of the public. Adapt will comply with all applicable laws and regulations and expect its directors, officers, and employees to conduct business in accordance with the letter, spirit, and intent of all relevant laws and to refrain from any illegal, dishonest, or unethical conduct.

In general, the use of good judgment, based on high ethical principles, will guide you with respect to lines of acceptable conduct. If a situation arises where it is difficult to determine the proper course of action, the matter should be discussed openly with your immediate supervisor. The Executive Director and Corporate Compliance Officer are available for consultation on such matters.

Compliance with this policy of business ethics and conduct is the responsibility of every employee. Disregarding or failing to comply with this standard of business ethics and conduct could lead to corrective action per the company policy. ADAPT has a full Corporate Compliance Plan and Employee Code of

Conduct which is provided to each employee upon hire and reviewed on an annual basis.

Immigration Law Compliance

We are committed to employing only United States citizens and individuals who are authorized to work in the United States and do not unlawfully discriminate on the basis of citizenship or national origin. In compliance with the Immigration Reform and Control Act of 1986, each new employee, as a condition of employment, must complete the Employment Eligibility Verification Form I-9 and present documentation establishing identity and employment eligibility. Former employees who are rehired must also complete the form if they have not completed an I-9 within the past three years, or if their previous I-9 is no longer retained or valid.

Employees with questions or seeking more information on immigration law issues are encouraged to contact the Human Resources Coordinator. Employees may raise questions or complaints about immigration law compliance without fear of reprisal.

Non-Disclosure

The protection of confidential business information and program/practice ideas is vital to the interests and the success of the company. Employees may have access to confidential information during the course of their employment including, but not limited to, the following examples: compensation data, computer processes, computer programs and codes, customer files, customer lists, financial information, marketing strategies, pending projects and proposals, and prospects information.

Employees who improperly use or disclose confidential business information will be subject to corrective action, per the company policy, and legal action, even if they do not actually benefit from the disclosed information. All business records and information are considered property of ADAPT, Inc.

Use of Confidential Information: Any employee given access to confidential information must have a legitimate "need to know," and are expected to:

- hold the information in confidence and to take reasonable precautions to protect such confidential information
- not divulge any such confidential information to any third person for any purpose other than those in conjunction with the business activities requested of us, unless otherwise permitted or required by law

Return of Confidential Information: Upon the termination of employment, employees are required to return to the company all documents and property of ADAPT, Inc., including but not necessarily limited to reports, manuals, correspondence, customer lists, computer programs and passwords, and all other materials and all copies thereof relating in any way to the company's business, or in any way obtained during the course of employment.

Retention/Disposal of Confidential Information: Employees are required to take reasonable measures to protect customer data from loss, misuse, unauthorized access or disclosure, alteration, or destruction. Any employee that generates confidential information should take responsibility for shredding those materials that are not kept for storage.

Adapt will take the necessary measures to ensure the confidentiality (in use, return, retention, and/or disposal) of all employees' personal information.

Privacy Policy

As required by the Michigan Social Security Number Privacy Act, we adopt this social security number policy. The company recognizes the importance and sensitivity of an individual's social security number.

We will ensure to the extent practicable the confidentiality of social security numbers held by the company.

Social security numbers will not be disclosed to those outside of the company, except as authorized by the Social Security Number Privacy Act. Access to information or documents that contain social security numbers will be limited to those requiring access.

Social security numbers may be used in the ordinary course of business. More than four sequential digits of a social security number will not be publicly displayed; used as an account number, password, or identifier; or included in or on any document sent outside the company unless applicable law requires, permits, or authorizes that the social security number appears in the document. Documents that are no longer needed that contain social security numbers must be shredded. Under no circumstances should any document with all or any portion of a social security number be disposed of without first being shredded.

Violation of this policy may result in discipline, up to and including dismissal. Employees who violate the Social Security Number Privacy Act also may be subject to fines and imprisonment.

Management Rights

The employer expressly retains and reserves, including but without limiting the generality of the foregoing, the right to:

- ◊ Hire, fire, suspend, and otherwise discipline its employees as the employer, in its sole discretion, deems advisable.
- ◊ To determine the work hours of the employee, to assign the employee and to lay off the employee as the employer, at its sole discretion, deems necessary. Management reserves the right to reduce work hours and transfer employees.
- ◊ To determine job classifications and duties of each employee, subject to change without written notice to the employee.
- ◊ To manage its affairs efficiently and economically, including the determination of quantity and quality of services to be rendered, the control of equipment to be used, and discontinuation of any services or methods of operation.
- ◊ To introduce new equipment, methods, or processes, change or eliminate existing equipment, institute technological changes, and decide on supplies and equipment to be purchased.
- ◊ To sub-contract or purchase the construction of new facilities, or the improvement of existing facilities, as the employer, at its sole discretion, deems advisable.
- ◊ To determine and adjust the number, location, and type of facilities, to direct the work force, to assign the type and location of work assignments, and determine the number of employees assigned to operations.
- ◊ To close or otherwise reduce the scope of operation of any or all facilities.
- ◊ To determine starting and quitting times, and the number of hours to be worked by employees.
- ◊ To establish and change work schedules, work standards, and the methods of processes and procedures by which such work is to be performed by employees.
- ◊ To select employees for promotion or transfer to other supervisory positions, and to determine the qualifications and competencies of the employees to perform the available work.

Financial Fraud and Abuse

The purpose of this policy is to provide ADAPT's management, employees, agents, and contractors with information pertaining to state and federal fraud and abuse laws. This policy also provides information regarding ADAPT's compliance program policies and procedures designed to detect, investigate, and report any suspected fraud or abuse in accordance with the Federal Deficit Reduction Act. For purposes of this policy, abuse **refers to abuse of financial resources** rather than physical or mental abuse.

- It is the policy of ADAPT to detect, investigate, and report any suspected fraud or abuse within the organization's operation. As an organization, ADAPT is committed to prevent fraud, abuse, and waste while furthering its mission. In order to meet these objectives, ADAPT has established a Corporate Compliance Program and appointed a Corporate Compliance Officer.
- All employees are expected to adhere to all legal, regulatory, fiscal, and program requirements.

- Each employee is responsible for reading, understand, and implement ADAPT's policy on fraud and abuse as set out in this personnel manual and in the full Corporate Compliance Plan.
- Each employee shall immediately report any suspected fraud, abuse, or waste to ADAPT's Corporate Compliance Officer. Employees shall not be discriminated or retaliated against or be subject to any form of disciplinary or other adverse employment action, for making such reports in good faith.

Employees are expected to provide only those services authorized and necessary, accurately documenting and billing for authorized services rendered. Under no circumstances shall any employee knowingly make false or inaccurate claims; bill for services not rendered; provide and/or bill for medically unnecessary services or submit duplicate billings.

ADAPT has a full Corporate Compliance Plan and Employee Code of Conduct which is provided to each employee upon hire and reviewed on an annual basis.

Prevention and Detection of Fraud, Waste, and Abuse

ADAPT has a full Corporate Compliance Plan and Employee Code of Conduct which is provided to each employee upon hire and is available at each work location. The organization's procedures for preventing and detecting Fraud, Waste, and/or Abuse are outlined in the full plan. All employees are expected to read and understand the plan upon hire and review annually thereafter.

Anti-Harassment

Harassment based on race, color, religion, sex/gender identification, sexual orientation, national origin, age, disability, genetic information, or any other characteristic protected by law is unlawful discrimination and is prohibited by federal law and the employer. The employer will not tolerate any form of harassment.

For the purposes of this Policy, "Harassment" means unwelcome verbal communication or physical contact because of race, color, religion, sex/gender identification, sexual orientation, national origin, age, disability, genetic information, or any other characteristic protected by law, which unreasonably interferes with a person's work performance, or which creates an intimidating, hostile, or offensive work environment.

"Harassment" includes "sexual harassment," which means unwelcome sexual advances, unwelcome requests for sexual favors and other unwelcome verbal or physical conduct or communication of a sexual nature when:

(a.) submission to such conduct or communication is made either explicitly or implicitly a term or condition of the individual's employment;

(b.) submission to or rejection of such conduct or communication by an individual is used as a basis for employment decisions affecting such individual; or

(c.) such conduct or communication has the purpose or effect of unreasonably interfering with an individual's employment or creating an intimidating, hostile, or offensive work environment.

Examples of Harassment may include one or more of the following:

- Physically touching an employee in an offensive manner;
- Making suggestive or derogatory comments or gestures about a person's race, color, religion, sex/gender identification, sexual orientation, national origin, age, disability, genetic information, or any other characteristic protected by law;
- Displaying magazines, cartoons or jokes which are derogatory about a person's race, color, religion, sex/gender identification, sexual orientation, national origin, age, disability, genetic information, or any other characteristic protected by law;
- Telling jokes which are derogatory about a race, color, religion, sex/gender identification, sexual orientation, national origin, age, disability, genetic information, or any other characteristic protected by law.

Examples of sexual harassment may include one or more of the following:

- Repeated and unwelcome requests for dates after work;

- Sending letters which make romantic suggestions;
- Sexual advances or propositions or threats;
- Continuing to express interest after being informed that the interest is unwelcome;
- Suggestive or insulting comments or sounds, including whistling;
- Commentary about an individual's body;
- Display of sexually suggestive objects, pictures, or letters;
- Obscene gestures;
- Unwanted physical contact, including offensive touching, pinching, brushing the body, impeding, or blocking movement, unwanted sexual intercourse (rape) or other unwanted sexual acts, sexual assault, or battery. Sexual assault/battery should be reported to the police.

The above list is not meant to be exhaustive but is included to provide examples of prohibited action.

The employer does not condone, either explicitly or implicitly, and will not tolerate harassment of any kind by anyone in the organization, consumers, vendors, independent contractors, applicants for employment, or visitors to the workplace.

Any employee who believes that the actions or words of a fellow employee or member of management constitute harassment or promote a hostile work environment should report the incident as soon as possible to his/her supervisor. If the employee cannot report the complaint to his/her supervisor because the supervisor is the offending party, the employee should speak to the Executive Director, Human Resource Coordinator, or the Director of Services for either Branch or St. Joseph County.

If possible, all complaints should be reported within 48 hours of occurrence. In filing a complaint about harassment, the employee should be prepared to specifically identify the incident(s) in question, the dates (if possible), the name of the person accused of wrongdoing, witnesses, a description of exactly what happened and what remedy would be satisfactory. This information affords management the opportunity to make a thorough investigation into the alleged incident(s) of harassment, which shall be conducted promptly. The employee should be prepared to describe the allegations in a written statement.

Further, after the employee has raised his/her harassment complaint with the appropriate party and the employee continues to believe the problem is occurring, he/she is encouraged to pursue his/her complaint with the Board of Directors or the Equal Employment Opportunity Commission (EEOC).

Employees found to be engaged in harassment shall be disciplined. Such discipline can range from a written warning to discharge depending on the judgment of management to the seriousness of the offense. Management will take into consideration proposed suggestions of the victim of the harassment regarding disciplinary action but reserves the right to make the final decision.

ADAPT shall assure that no individual will be retaliated against for making a complaint of harassment, opposing harassment, or participating in an investigation under this policy, regardless of whether a policy violation is found, no policy violations found, or no determination of a policy violation is possible.

Diversity and Inclusion

Adapt recognizes that persons served, stakeholders and employees have varying perspectives based on their unique cultural background. The organization strives to respect cultural differences, which are discussed in the agency's Cultural Competency training provided upon hire and annually thereafter. Diverse perspectives, values, styles, and beliefs are viewed as an asset to the organization's ability to provide quality services in a culturally aware manner. One's cultural perspective is based on the following primary and secondary dimensions and, according to the Veteran's Administration, is the filter for all communication:

- ***Primary Dimensions:*** *Age, Gender Identification, Sexual Orientation, Disability, Race, Ethnic Heritage*
- ***Secondary Dimensions:*** *Education, Geographic Location, Work/Thinking Style, Family Status, Communication Style, Organizational Role and Level, First Language, Religion, Socioeconomic Status, Work Experience, and Military Experience*

Cultural Competence does not mean knowing everything about all different groups of people. The Veteran's Administration defines Cultural Competence as the ability to respond effectively and appropriately to different cultural/generational contexts in the workplace. This can be achieved by acknowledging and accepting the differences in cognitive, behavioral, philosophical, social, and communicative styles that arise from different cultural/generational contexts. In order to understand these differences, employees must seek to understand by asking for clarification or reasons for a behavior or perspective. An environment striving to achieve cultural competence is one where people respect the opinions of others, acknowledge differences without becoming defensive, are open to learning about other cultures and ideas, do not stereotype or judge others, understand that one's own culture is not superior to others and communicate effectively with others.

Adapt will strive to meet the culture-based needs of persons served, stakeholders, and employees through education provided on an ongoing and situational basis. Attempts to provide training and information in a different language will be made as the need arises, and translators are typically arranged through the local Community Mental Health (CMH) agency. Employees will be educated on the cultural differences of the person they are serving and/or stakeholders, as well as their co-workers. Adapt has a Diversity training curriculum that is taught upon hire and annually. This curriculum will be updated periodically to remain relevant and reflective of the community in which Adapt exists and provides services. Adapt management will encourage employees, persons served, and stakeholders to express concerns and ideas regarding Diversity education and promoting an inclusive culture.

Workplace Monitoring

Workplace monitoring may be conducted by ADAPT, Inc. to ensure quality control, employee safety, security, and customer satisfaction. Computers furnished to employees are the property of the company. As such, computer usage and files may be monitored or accessed. Because the company is sensitive to the legitimate privacy rights of employees, every effort will be made to guarantee that workplace monitoring is done in an ethical and respectful manner.

Inspection of Containers and Packages

Adapt reserves the right to inspect all containers and packages entering and leaving the premises such as boxes, bags, lunch containers, briefcases, etc. at all ADAPT home/program locations.

Weapons and Workplace Violence Prevention

Adapt is committed to preventing workplace violence and to maintaining a safe work environment. Given the increasing violence in society in general, we have adopted the following guidelines to deal with intimidation, harassment, or other threats of (or actual) violence that may occur during business hours or on its premises.

All employees, including supervisors and temporary employees, should be treated with courtesy and respect at all times. Employees are expected to refrain from fighting, "horseplay," or other conduct that may be dangerous to others. Firearms, weapons, and other dangerous or hazardous devices or substances are prohibited on company premises. We recognize there are state laws regarding weapon permits, including concealed weapon permits. However, we prohibit the possession of such weapons on company premises, in company vehicles, or while on company time/during company events regardless of any permit obtained by the employee. Utility/pocketknives and tasers are prohibited on company property.

Employees who choose to carry mace/pepper spray for personal protection while coming to and going from work must leave these items locked in their personal vehicle. Under no circumstances will these items be brought into an Adapt home or building. It is a violation of company policy to openly display or inappropriately refer to possession in a threatening or disruptive manner while performing work responsibilities or interacting with coworkers or the people we serve. Any employee choosing to carry pepper spray/mace for his or her personal protection while coming to and going from work shall be liable for the cost of property damage, cleanup, or injury to others should the cannister discharge or become accessible. If you do not have a vehicle in which to lock such items, do not bring them to work. Possession of pepper spray/mace in an Adapt Home, building, or facility where work is scheduled (i.e., training) is grounds for immediate termination.

Conduct that threatens, intimidates, or coerces another employee, a person who is served in any Adapt program, or a member of the public at any time, including off-duty periods, will not be tolerated. This prohibition includes all acts of harassment, including harassment that is based on an individual's sex, race, age, or any characteristic protected by federal, state, or local law.

All threats of (or actual) violence, both direct and indirect, should be reported as soon as possible to your immediate supervisor or any other member of management. This includes threats by employees, as well as threats by persons served, vendors, solicitors, or other members of the public. When reporting a threat of violence, you should be as specific and detailed as possible.

All suspicious individuals or activities should also be reported as soon as possible to a supervisor. Do not place yourself in peril. If you see or hear of a commotion or disturbance near your work site, do not try to intercede or see what is happening.

We will promptly and thoroughly investigate all reports of threats of (or actual) violence and of suspicious individuals or activities. The identity of the individual making a report will be protected as much as is practical. In order to maintain workplace safety and the integrity of its investigation, the company may suspend employees, either with or without pay, pending investigation. Anyone determined to be responsible for threats of (or actual) violence or other conduct that is in violation of these guidelines will be subject to corrective action per the company policy.

We encourage employees to bring their disputes or differences with other employees to the attention of their supervisors or the Director of Services for either Branch or St. Joseph County before the situation escalates into potential violence. We are eager to assist in the resolution of employee disputes and will not discipline employees for raising such concerns.

Drug and Alcohol Use

ADAPT is committed to providing a drug-free, healthy, and safe workplace for its employees, and to providing the highest quality of services to the people we serve. To promote these goals, employees are required to be in appropriate mental and physical condition to perform their jobs in a safe and satisfactory manner.

While on company premises and while conducting business-related activities off company premises, no employee may use, possess, distribute, sell, or be impaired by alcohol or prohibited substances. “Prohibited substances” are defined as illegal drugs, controlled substances, and any other substance that may affect the employee’s behavior or ability to perform job duties safely and effectively, including marijuana and alcohol. “Impaired” means any impairment of functions or judgment, or a blood alcohol concentration of .02 or greater.

Testing: Any employee who is suspected of violating this policy may be required to undergo a test to determine the presence of alcohol, prohibited substances, or of their metabolites. A refusal to undergo a required test, an attempt to impair the validity of the sample or test result, or a failure to provide a satisfactory sample for testing, will be treated as a positive test result.

Medications: No employee is to engage in any work-related activity while using any medication that could impair safe and effective work performance. Employees using any medication are responsible to determine whether the medication could impair their job performance, safety, or behavior. Employees are encouraged to consult their physician to answer any questions about this. An employee who has reason to believe that their medication could have an adverse effect on safety or performance is required to report that information to their supervisor. Employees may maintain prescription medications on company premises only if the medication has been prescribed by a licensed physician for the person in possession of the drugs and the medication is kept in its original container.

Possessing, using, or being impaired by medical or recreational marijuana on company property or in the course of any work-related activity is strictly prohibited. Delivery of marijuana and/or any marijuana-based

product, and any associated paraphernalia, to any ADAPT property is strictly prohibited. Delivery of alcohol to any ADAPT property is strictly prohibited. Marijuana is viewed the same as alcohol by the employer. Employees are prohibited from working while under the influence of both alcohol and marijuana.

Violations: A positive test result or other violation of this policy is subject to corrective action under company policy, up to and including termination of employment. At the company's sole discretion, corrective action may include referring an employee for participation in a substance abuse rehabilitation or treatment program.

Referral: Any employee with questions or concerns about substance abuse or treatment options is encouraged to contact the Director of Services for Branch County for assistance in locating appropriate resources. All such inquiries will be handled with appropriate confidentiality. No employee will be subject to discipline for seeking assistance or treatment. However, an employee who violates this policy before requesting assistance or treatment remains subject to corrective action for the policy violation. Employees may also use Ulliance as a referral source for substance treatment. Ulliance is available to all employees, as well as their immediate family members, even if they do not have ADAPT's medical coverage.

Subpoenas, Search Warrants, and Legal Servings

Employees who are served with subpoenas, search warrants, or any other legal documents pertaining to ADAPT business/programs are to contact their supervisor immediately. If the legal process (search warrant) must be started immediately, staff will allow law enforcement to begin after thoroughly reading the legal documents and then will contact their supervisor. Any other legal papers that are served must be communicated as soon as possible to the program supervisor. If the immediate supervisor is unavailable, the Director of Services for the county or the Executive Director should be contacted.

Publicity

Only the Executive Director or a staff member specifically designated by the Executive Director shall make all official statements of any nature to the public.

Professional Development

ADAPT encourages professional development and staff education. The Executive Director shall encourage staff members to attend professional meetings and educational opportunities, rotating attendance when possible. Recognized methods such as staff meetings, customized trainings and in-services, and classes, may be utilized in providing educational opportunities for employees.

ADAPT may have funds available for fees for employee training. All training the Executive Director must approve expenditures.

Problem Resolution

We strive to ensure fair and honest treatment of all employees. All employees are expected to treat each other with mutual respect. Employees are encouraged to offer positive and constructive criticism.

If employees disagree with established rules of conduct, policies, or practices, they can express their concern through the problem resolution procedure. No employee will be penalized, formally or informally, for voicing a complaint with the company in a reasonable, business-like manner, or for using the problem resolution procedure.

If a situation occurs when employees believe that a condition of employment or a decision affecting them is unjust or inequitable, they are encouraged to make use of the following steps. Employees are encouraged to present the problem to their immediate supervisor after the incident occurs. The supervisor is expected to respond to the problem during discussion or, when necessary, after consulting with appropriate management. If the problem remains unresolved, employees are encouraged to present the problem directly to the Director of Services for the county in which the employee works. If the employee is not satisfied with the decision of the Director of Services for that county, the employee may request, in writing, a review from the Executive Director. Such review shall be promptly conducted, and a copy of the proposed

resolution suggested by the Executive Director shall be final and binding unless reviewed by the Board of Directors.

An employee who is not satisfied with the proposed resolution by the Executive Director may file a written appeal with the Board of Directors. Final action shall be taken by the Board of Directors. Such action shall be reduced to writing, included in the minutes of the Board meeting and a copy will be delivered to the employee. The proposed resolution of the Board of Directors will be final and binding.

Employment of Relatives and Personal Relationships Among Coworkers

The employment of relatives of employees is permitted, as long as qualifications for the position are met and, in the opinion of ADAPT management, employing the relative will not create an actual or perceived conflict of interest. Employees will not be permitted to work in positions where relatives will influence, or be influenced by, decisions affecting work assignments, responsibilities, salary, promotion, or other career matters. Supervisors who seek to hire, transfer, or promote their own relatives must obtain prior approval from their supervisor.

Relatives include spouse, parent, parent-in-law, child, stepchild, grandparent, grandchild, sister/brother, sister-/brother-in-law, aunt/uncle, niece/nephew, and any individual with whom an employee has a personal relationship.

Personal relationships may create an actual or perceived conflict of interest, and/or create the risk of sexual harassment and/or hostile work environment-related claims. Thus, supervisors may not hire, promote, or directly supervise any person with whom they have a personal relationship, nor may they engage in any personal relationships with their subordinates.

A personal relationship includes but is not limited to the following: dating, sharing the same household/living together, and marriage. The nature of a personal relationship is not limited to romantic relationships or a “relative.”

An employee must notify his/her supervisor if a relationship with another employee changes to fit the definition of ‘relative’ above. If a personal relationship develops between a supervisor and subordinate, both employees are required to inform their supervisor. Relationships involving strong emotional attachment or involvement of any kind between a supervisor and an employee can become complicated for multiple reasons and present risks to employees and the organization, with the most obvious risk being the appearance of favoritism, impropriety, and a loss of morale. Relationships need to be disclosed to the immediate supervisor of the employee in the position of authority so arrangements can be made to best address the issue. ADAPT management reserves the right to use its sole discretion to address these issues.

ADAPT reserves the right to use its sole discretion in placing and transferring relatives of its current employees in a manner calculated to eliminate potential conflicts of interest or other employment complaints. To do this, ADAPT management will take action that is fair and equitable, and that will remove any direct reporting or management relationship between employees who are defined as ‘relatives.’

Similarly, ADAPT management reserves the right to use its sole discretion in the hiring or placement of new employees who have personal relationships with current employees. The employer reserves the right to review and modify the placement of all current employees who have personal relationships with co-workers. ADAPT management will take action that is fair and equitable to eliminate any direct reporting or management relationship between employees who are involved in a personal relationship. Finally, the employer may change the placement of individuals involved in a personal relationship regardless of whether there is a direct reporting or management relationship if the employer determines that the personal relationship interferes with the employee’s job performance.

Employee/Consumer Relationships

Employees will refrain from pursuing or engaging in intimate personal relationships with people served by the agency. Given the nature of our work, such dual relationships can lead to confusion and result in

unethical conduct. Employees will not use their position within the agency as a means of developing relationships with program participants. Engaging in an intimate relationship with a program participant is cause for immediate dismissal from the organization.
When an employee has a pre-existing relationship with a person who becomes a person served by the agency, the employee must inform his/her supervisor of the relationship and agree to remove him/herself from work-related duties regarding that individual. When a program participant has a pre-existing relationship with a person who becomes an employee, the employee will not be permitted to work with the person served by the agency except in the In-Home Supports Program. If circumstances require the employee to perform his/her duties with or regarding that program participant, as determined by supervisory staff, the employee's supervisor will closely monitor the situation. Employee/consumer relationships that develop in a way that is entirely independent of the agency shall be handled in the same manner as a pre-existing relationship.

Employees who separate from ADAPT, either through resignation or termination, and desire to visit individuals with whom they have worked, should make their request to visit directly to the supervisor of the home/program. Such requests will be reviewed on a case-by-case basis, with benefit to the program participant as the primary consideration.

In order to avoid potential conflicts of interest, it shall be the policy of ADAPT to prohibit staff from becoming a payee, guardian, or foster home operator to the people served by ADAPT. Pre-existing arrangements may preclude a person from becoming an ADAPT employee. The Executive Director may allow exceptions.

Reporting Staff Injuries

Any employee who is injured while at work must follow the following procedures:

1. Report the injury to your on-site supervisor immediately.
2. You must complete an *ADAPT's Report of Employee Injury* form, making sure you complete the entire section for the employee, sign it, date it, and leave it for your supervisor to review within 24 hours. If the form is not accessible you must contact a supervisor and arrange to receive a form.
3. If you require medical attention during normal business hours (8:00am to 4:00pm) or if you are able to wait until normal business hours, you must contact the office during normal business hours. A designated office staff member will authorize an appointment for you at Prompt Care in Branch County and Revolution Health in St. Joseph County.
4. If you require attention after normal business hours, you have to go to the Emergency Room at the nearest hospital. You must inform your supervisor prior to going to the Emergency Room. If your immediate supervisor is not available, you must contact the Director of Services for the county in which you work.
5. While at the Emergency Room, inform them you have injured yourself while on the job.
6. After the visit to the Emergency Room, Employees must contact the ADAPT office in the county in which they work the next business day and follow up with the Director of Services of the county in which he/she works. A follow-up visit to Prompt Care for Branch County and Revolution Health for St. Joseph County may be needed; this will be determined on a case-by-case basis.

Even if you do not believe you need medical attention immediately following an accident or injury while on the job, you must complete the *ADAPT's Report of Employee Injury* form. Time off due to work injury may be counted towards your Family Medical Leave time.

Good Moral Character and Criminal History Background Checks

It is the policy of ADAPT to conduct an initial background check upon hire using the Michigan State Police ICHAT system and the State of Michigan Licensing and Regulatory Affairs (LARA) background check system. Since this information may not be available until after an applicant has been hired and assumed responsibilities, it may be necessary to conduct a post-hire good moral character assessment that includes information found in the criminal history report. If the employer substantiates that the employee provided dishonest or false answers on the job application or during employment interviews, the employee may be terminated immediately. If the employer substantiates that the employee provided dishonest or false

answers on the job application, during employment interviews or is deemed not eligible for employment by our licensing agency, the employee may be terminated immediately.

After initial hiring checks, periodic ICHAT checks are conducted according to requirements of auditing entities, such as the Department of Health and Human Services (DHHS), Community Mental Health (CMH), and Southwest Michigan Behavioral Health (SWMBH). The LARA background check employs a "Rap-Back" system whereby ADAPT will receive a notification through email and the U.S. Mail of an employee's exclusion from working for ADAPT due to criminal history, or recent criminal conduct. A copy of the exclusionary letter is also mailed to the employee who is deemed ineligible to work for ADAPT. An Office of Inspector General (OIG) background check is included in the LARA background check system which is conducted upon hire.

Effective April 1, 2006, ADAPT must comply with Public Act 29 of 2006. In summary, this state statue mandates the obtainment of extensive criminal history background information, including FBI fingerprinting, of all individuals who seek employment, independently contract, or clinical privileges in positions that provide "direct access" to consumers served by this company. "Direct Access" is defined as on-going and regular periodic access to a patient or consumer or to a patient or consumer's property, financial information, medical records, treatment information, or any other identifying information. This law supplements and reinforces ADAPT's long-standing policies relating to requisite good moral character and suitability to work with vulnerable adults.

PA 29 of 2006 prohibits individuals with certain conviction histories from regularly providing direct services to consumers.

PA 29 of 2006 also prohibits the employment, independent contracting, or granting of clinical privileges to individuals who have been the subject of a finding of not guilty by reason of insanity and findings of neglect, abuse, or misappropriations of property by a state or federal agency pursuant to an investigation conducted in a skilled nursing facility.

The criminal history background information mentioned in this policy will be obtained by ADAPT only after a good faith offer of conditional employment or contract has been extended. All workers covered under this law must, as a condition of employment, execute any and all consent forms, acknowledgements, and releases arising from compliance with PA 29 of 2006.

As a condition of continued employment, all direct access workers must immediately report to ADAPT any arraignment or conviction of one or more offenses that make them ineligible to work under PA 29 of 2006. As an additional condition of employment, all direct access workers must report to ADAPT if they have become the subject of an order or disposition finding of not guilty by reason of insanity. Similarly, workers are to report if they are the subject of a substantiated finding of neglect, abuse, or misappropriation of property by a state or federal agency pursuant to an investigation arising in a skilled nursing facility. A complete listing of the offenses is provided to staff at hire and is available on ADAPT's website: www.ADAPTinc.org

The provision of false, incomplete, or misleading information during the hiring and application process will result in refusal of work and/or termination. Under Michigan law, an individual who knowingly provides false information regarding his or her identity, criminal convictions, or substantiated finding is guilty of a misdemeanor punishable by imprisonment for not more than 93 days or a fine of not more than $500 or both.

Below is a list of all background checks ADAPT is required to conduct on all employees upon hire:

- ***Verisk****-Driver's license*
- ***System for Award Management****-search of name*
- ***iChat****-Michigan State Police*
- ***Michigan Workforce Background Check****-Lara*
- ***Praesidium****-National criminal and sex offenders*

- ***DHS-Central Registry Clearance Request-*** *abuse and neglect (Branch County only)*
- ***Recipient Rights Office-*** *abuse and Neglect (Branch County only)*

Driver Record Checks

ADAPT will conduct background checks with the Department of Motor Vehicles for moving violations on an annual basis. Three (3) or more moving violations may result in loss of employment. An offense involving alcohol within a five-year period may likewise result in loss of employment. If, during employment, an employee does accumulate three (3) or more moving violations, an offense involving alcohol, or has their driver license suspended for any reason, they must immediately notify the Director of Services of the county in which he/she works. Additionally, drivers who have had their license for less than three (3) years are typically excluded from the agency's auto insurance, due to requirements of the insurance company.

Qualifications

Direct Care Employees must meet all the following to obtain and maintain employment, unless the Executive Director approves an exception:

◊ Complete required reports and follow written and oral instructions that are related to the care and supervision of consumers.
◊ Meet the physical, emotional, intellectual, and social needs of each consumer in their care.
◊ Be capable of handling emergency situations.
◊ Successfully complete training curriculum.
◊ Be in such physical and mental health so as not to negatively affect either the health or quality of care of the consumer.
◊ Be at least 18 years of age.
◊ Be able to physically assist in the lifting/transferring of consumers who range in size from child to adult.
◊ Be physically capable of engaging in physical intervention once trained.
◊ Be able to report to assigned work site at the assigned time.
◊ Be able to operate a motor vehicle safely and legally and be insurable under ADAPT's policy.
◊ Attend all regular and special staff meetings and in-services.
◊ Be of good moral character as defined by the AFC licensing requirements.
◊ Pass all periodic background checks required by funding sources and the law.

Training

◊ All necessary training and tests required by the State, any governmental agency, or ADAPT must be successfully completed.
◊ Must comply with any additional requirements which the State or ADAPT may impose in the future.
◊ All employees will be required to attend all regular and special staff meetings and special in-service training sessions that may be held at the home, program, or contracting agency.
◊ Employees will have two (2) opportunities to successfully pass all aspects of the training curriculum.
◊ Employees who are 30 or more minutes late will not be allowed to attend that training module.
◊ Through orientation, the formal training provided, and ongoing in-services, ADAPT employees review those licensing rules and requirements, and guidelines relevant to their responsibilities.
◊ Successful completion of all mandatory recertifications is a requirement of maintaining employment.

Medical Evaluations of Employees

ADAPT requires all employees to have pre-employment physicals and a TB test following a conditional job offer. The Human Resources Coordinator, or Designee will arrange an appointment with the appropriate provider of preemployment health evaluations to conduct the physical and TB test. The TB test will be updated as required by the State of Michigan's Licensing and Regulatory Affairs (LARA).

The Hepatitis B Vaccine is available to all employees and is paid for by Adapt. If an employee chooses not to accept the vaccine, a waiver must be signed. The employee can change his/her mind at any time and contact the Human Resources Coordinator to arrange to receive the Hepatitis B Vaccine.

After a person starts work, a medical examination or inquiry of an employee may be made if it is job-related and necessary for the business. The employer also reserves the right, at its sole discretion and expense, to require an employee to provide a physician's statement verifying that the employee is physically and emotionally capable of performing the employee's job responsibilities. Employees are required to report changes in their physical and/or emotional condition that are negatively impacting on their ability to meet all the requirements of their job. When appropriate, the agency will accommodate an employee provided it does not disrupt the operation of the program, cause an undue burden on coworkers, or jeopardize the financial stability of the program and/or organization.

Employment Applications

ADAPT relies upon the accuracy of information contained in the employment application, as well as the accuracy of other data presented throughout the hiring process and employment. Any misrepresentations, falsifications, or material omissions in any of this information or data may result in the exclusion of the individual from further consideration for employment or, if the person has been hired, termination of employment. Employment applications will be retained in the employee's personnel file.

Employment Reference Checks

To ensure that individuals who join ADAPT are qualified and have a strong potential to be productive and successful, we reserve the right to check the employment references of job applicants.

An ADAPT representative will respond in writing only to those reference check inquiries that are submitted in writing. Responses to such inquiries will be limited to dates of employment, job title, and basic job description. No employment data will be released without written authorization signed by the individual who is the subject of the inquiry.

Job Descriptions

A written job description listing the date of hire, rate of pay, essential functions/duties, qualifications, and any conditions of employment shall be signed by the employee and retained in the personnel file.

Maintenance of Personnel Files

A personnel file will be maintained for each employee. For the purpose of maintaining complete and accurate personnel files, employees are required to report any changes in their personal status to the employer by informing his/her supervisor or calling the office in the county of employment. The supervisor or office personnel receiving the information from the employee will complete a status change with the new information. The status change will become part of the personnel file. The information an employee needs to keep current is:

- ◊ change in home address, telephone number, and email address
- ◊ any change affecting your tax withholding status
- ◊ legal change of name
- ◊ change of persons designated to call in case of emergency
- ◊ changes that would affect your insurance benefits (including changes in marital/family status)

It is important for employees who separate from employment to ensure ADAPT has their current address. If an employee moves after leaving employment, a change of address notification is necessary to ensure a correct address to send the previous year's W-2 form.

Access to Personnel Files

The personnel file includes information such as the employee's job application, resume, training records, annual performance evaluations, status changes, and other employment records. Personnel files are the property of ADAPT, Inc., and access to the information they contain is restricted. Generally, only supervisors and management personnel of the company who have a legitimate reason to review information in a file are allowed to do so. An employee may examine time sheets and any other records relevant to proper computation of his or her pay or benefits at any reasonable time during regular business hours.

We assume no obligation to furnish information about any employee to any third party (other than to verify

his or her current employment). An employee who desires us to furnish certain information to a third party may file a written request to that effect with the company. The employee will be required to execute a release before we disclose requested and approved information to third parties.

Evaluations

Supervisors and employees are strongly encouraged to discuss job performance and goals on an informal and frequent basis. Formal performance evaluations are conducted to provide both supervisors and employees with the opportunity to discuss job tasks, identify and correct weaknesses, encourage and recognize strengths, and discuss positive, purposeful approaches for meeting goals. All employment goals are expected to be measurable.

Employees are generally evaluated at 90 days of employment and annually thereafter. If there is disagreement about an aspect of the performance evaluation, a written statement by the employee may be included in the evaluation form. The statement should provide details about the disagreement and be signed and dated. All employee evaluations are maintained in the personnel file.

Resignation

◊ Resignations are requested to be in writing. ADAPT has a resignation form, though any form of written notice is appreciated.

◊ Employees choosing to terminate their employment with ADAPT should inform their supervisor as soon as possible in order to ensure continuity of care for the people ADAPT serves.

Termination

The employment of any employee may be terminated by the Executive Director/or designee, or Board of Directors of ADAPT, at any time, for any reason whatsoever, effective forthwith, and in such event written notice of said termination shall be delivered to the employee.

Other Employment

Employees are prohibited from performing any services or having any interest or involvement, either directly or indirectly, in any other business, which resembles or competes with ADAPT, unless the Executive Director or designee has made an exception. Any employee who already has or is considering an outside business involvement or employment which would appear to compete with ADAPT must inform his/her supervisor immediately. ADAPT reserves the right to determine if the employee's involvement in such a venture, as described above, has the potential to conflict with the successful operation of ADAPT. If such involvement is deemed to potentially conflict with the success of any ADAPT program or person served, ADAPT reserves the right to determine the way to resolve the conflict, which may include termination of the employee. If the employment is approved and found later to conflict with the operation of an ADAPT program or causes harm to the reputation of the agency, the employee may be asked to choose between ending the other employment arrangement or terminating employment with Adapt.

Employees who have other employment not competing or conflicting with ADAPT business are required to meet all of the requirements and responsibilities of their position at ADAPT. Examples include, but are not limited to, maintaining the privacy and confidentiality of persons served, punctual and consistent attendance to scheduled shifts, and being in a physical and mental condition that allows the employee to consistently meet all job duties and responsibilities while on shift.

Gifts, Gratuities, and Loans

Employees are not permitted to accept loans, gifts, money, goods, services, or other preferred arrangements of personal benefit, under any circumstances, directly or indirectly involving possible interest, or appearance of influence upon the manner in which they perform their work, make their decisions, or otherwise discharge their duties as an ADAPT employee. The Executive Director must approve of any gift of doubtful nature. Employees are not permitted to borrow from or loan money to consumers or family members of persons served under any circumstances. Employees are not to commingle, borrow, or pledge funds of a consumer. Michigan law makes it a misdemeanor, with the possibility of jail time and a large fine,

or both if convicted. Consumer accounts are individual to the consumer. Neither ADAPT nor any ADAPT employee shall have any ownership interest in any consumer account.

Solicitations and Fund Drives

Contributions by employees to community organizations are voluntary. The Executive Director and/or Board shall at no time estimate or determine what amount such contributions shall be. No solicitations of any kind are allowed, with the exception of those approved by the Executive Director.

II. EMPLOYEE CONDUCT

Employee Conduct and Work Rules

To ensure orderly operations and provide the best possible work environment and care for persons served, ADAPT expects all employees to follow rules of conduct that will protect the interests and safety of all employees, persons served, and the organization overall. All employees should constantly be aware that they act as role models for the people we serve, and their conduct reflects ADAPT. As an organization, ADAPT is committed to promoting full community integration for persons served, and the reputation and behavior of all employees is an important part in fulfilling this commitment.

It is not possible to list all the forms of behavior that are considered unacceptable in the workplace. The following are examples of infractions of rules of conduct that may result in corrective action or termination per the company policy:

- Theft or inappropriate removal or possession of property
- Falsification of timekeeping records
- Working under the influence of alcohol, marijuana, or illegal drugs
- Possession, distribution, sale, purchase, transfer, or use of alcohol, marijuana, or illegal drugs in the workplace, while on duty, or while operating employer-owned vehicles or equipment
- Fighting or threatening violence in the workplace
- Boisterous or disruptive activity in the workplace
- Negligence or improper conduct leading to damage of employer-owned or customer-owned property
- Insubordination or other disrespectful conduct
- Sexual or other unlawful or unwelcome harassment
- Possession of dangerous or unauthorized materials, such as explosives or firearms, in the workplace
- Excessive absenteeism or any absence without notice
- Unauthorized use of telephones, mail system, or other employer-owned equipment
- Unauthorized disclosure of business "secrets" or confidential information, including information about persons served and family members/guardians.
- Violation of personnel policies
- Unsatisfactory performance or conduct
- Swearing/cussing or the use of derogatory language either directed at, or used in the presence of, persons served, stakeholders, co-workers, and other members of the community.
- Public defamation and harassment, of any kind, of any ADAPT stakeholder (employees, persons, served, family member/guardian), via any form of social media or through in-person gossip.

Employment with ADAPT is at the mutual consent of the company and the employee, and either party may terminate that relationship at any time, with or without cause, and with or without advance notice.

Employee Honesty and Integrity

As a new employee, you were hired by ADAPT with the fact in mind that your honesty and integrity are of the highest level. We are certain these traits will greatly increase your chances of success if you continue them throughout your lifetime. It is every employee's responsibility to enforce and/or report policy, rule, and procedure violations to his/her supervisor or an administrative member.

Confidentiality of Employee and Consumer Information

All consumers and employees have the right to confidentiality. Accepting employment at ADAPT places you in a position of trust in regard to consumer information, and in some situations, co-workers. Employees must be constantly aware of the confidential nature of all information regarding consumers, and in some cases, fellow employees. All records and data are confidential which pertain to testing, care, treatment, reporting, and research associated with the care of a person served, or the health status of an employee. Any employee who releases information in any form about a consumer or employee's medical status may be guilty of a misdemeanor, punishable by imprisonment or a fine or both, and is liable in a civil action for actual damages and cost and reasonable attorney fees.

Any employee who receives an inquiry regarding health or treatment information of a consumer or fellow employee should immediately direct the person making the inquiry to the Director of Services for the county, or the employee should contact the Director of Services directly. Information concerning consumers is not to be released outside the home or program. Information concerning consumers or employees must not be released, whether written, or verbally in-person or over the phone, to any individual or agency without the written authorization of the employee and/or consumer/guardian, who is the subject of inquiry.

ADAPT complies with all HIPPA rules and regulations.

Consumers must not be discussed in front of themselves or other consumers. Discussions of their personal lives outside the program or home, with anyone including ADAPT employees, are not acceptable. Activities and/or incidents occurring in the home and/or program of the person served must not leave that environment. Employees are not to discuss consumer behavior, programs, or information with employees of another home or program unless the person served/guardian approves of the disclosure and such sharing of information is needed to provide effective care to the person served. ***Casual conversations amongst coworkers in an office setting about the people we serve is an example of a violation of confidentiality and should absolutely NOT happen; this is not the culture we allow or desire at Adapt.*** There are multiple policies regarding consumer rights and treatment in the Consumer section of the Personnel Policies.

Personal Appearance

All employees serve as role models for ADAPT consumers, and their appearance reflects ADAPT. The reputation of the organization and its employees is crucial to ensuring the fulfillment of ADAPT's commitment to promote full community integration for persons served. All employees are expected to maintain a high standard of neatness, cleanliness, and personal hygiene. All employees should arrive for work in neat and clean clothing, which is appropriate for working conditions and planned activities. Clothing can be casual but should be in good repair and presentable. All staff must wear acceptable length shorts, shirts, and skirts – **an acceptable length is mid-thigh or longer**. Shorts referred to "Daisy Dukes" or similar, are not appropriate for work. Shirts must not expose the midriff (belly) or an excessive amount of one's chest and these standards apply to all employees. Excessively tight clothing is not permitted – excessively tight clothing is anything that displays what is typically considered "private" body parts in keeping with commonly accepted standards of public decency. These requirements are the minimum with regard to professional appearance. ***If you feel this infringes on your personal rights, then Adapt may not be the right fit for you. We are role models and we also consider the people we serve and their level of comfort.***

Closed toe shoes must be worn at all times by Direct Care employees. Bare feet are not accepted or tolerated at any time unless appropriate for a specific activity. (Example: beach activity).

Corrective Action

Although your employment is at-will (either party may terminate the employment relationship at any time with or without cause or notice), violation of any policies and procedures of this handbook may result in corrective action, including the possibility or termination. When performance problems occur, the usual steps of corrective action undertaken **may** be coaching/training, verbal warning, written warning, and ultimately, termination of employment. These are guidelines and ADAPT may, at the discretion of management, skip any and all steps in the corrective action system or decide not to use the corrective action system at all. Furthermore, if an employee engages in misconduct deemed to be serious enough by

the company, ADAPT management may, in its sole discretion, terminate employment without the application of other, less severe corrective action. ADAPT also reserves the right to address any offense not specifically enumerated in this handbook in a manner commensurate with the seriousness of the offense.

Building Use

Employees are not to be at the ADAPT building after regular work hours (8am – 4pm) without the knowledge and permission of the Director of Services for the county or designee. If work-related activities involve non-work hours, approval from your supervisor must be obtained.

Use of Equipment and Vehicles

Equipment and vehicles essential in accomplishing job duties are expensive and may be difficult to replace. When using property, employees are expected to exercise care, perform required maintenance, and follow all operating instructions, safety standards, and guidelines. This includes the appliances in all homes and programs.

Please notify the supervisor if any equipment, machines, tools, or vehicles appear to be damaged, defective, or in need of repair. Prompt reporting of damage, defects, and the need for repairs could prevent further deterioration of equipment and possible injury to employees or consumers. The supervisor can answer any questions about an employee's responsibility for maintenance and care of equipment or vehicles used on the job.

The improper, careless, negligent, destructive, or unsafe use or operation of equipment or vehicles, as well as excessive or avoidable traffic and parking violations, can result in corrective action per the company policy.

Acceptable Use of Technology

Technology is a business tool provided to employees at a significant cost to ADAPT. While our direct connection to the Internet offers you a plethora of potential benefits, it can also open the door to some significant risks to our data and systems if we do not follow appropriate security discipline. Unnecessary or unauthorized Internet usage causes network and server congestion by decreasing the bandwidth that is available to others. ADAPT insists that you conduct yourself honestly and appropriately on the Internet, and respect the copyrights, software licensing rules, property rights, privacy, and prerogatives of others, just as you would in any other business dealings. All existing company policies apply to employee conduct while using all computers and related equipment at ADAPT.

Detailed Policy Provisions

1. The company has software and systems in place that can monitor and record all Internet usage. No employee should have any expectations of privacy to his or her Internet and/or email usage.

2. We reserve the right to inspect any and all files stored in compliance with this policy

3. The display of any kind of sexually explicit image or documentation on any company system is a violation of our policy on sexual harassment. In addition, sexually explicit material may not be archived, stored, distributed, edited, or recorded using our network computing resources

4. Our Internet facilities and computing resources must not be used knowingly to violate the laws and regulations of the United States or any other nations, or the laws and regulations of any state, city, province, or other local jurisdictions in any material way.

5. Any software or files downloaded via the Internet or any other media into the company network becomes the property of the company. Any such files or software may be used only in ways that are consistent with their licenses or copyrights.

6. No employee may use company facilities or hardware knowingly to download or distribute pirated software or data.

7. No employee may use company Internet facilities or hardware to deliberately propagate any virus, worm, Trojan horse, trap door, or any other program code that could be potentially harmful to the company or any other users on the World Wide Web.

8. No employee may use the company's Internet facilities or hardware to disable or overload any computer system or network, or to circumvent any system intended to protect the privacy or security of another user.

9. User ID's and passwords help maintain individual accountability for the Internet and other Information Technology resources. Any employee who obtains a password or ID for these resources must keep that password confidential.

10. All hardware not owned by ADAPT must be endorsed by the Executive Director or Designee and scanned for viruses' before it can be connected to our local area network.

11. The Executive Director or Designee must ok all changes impacting the company's hardware.

12. Employee access to and use of electronic tools such as e-mail and the Internet is intended for business-related purposes. Limited and reasonable use of these tools for occasional employee personal purposes, as set forth by an approved supervisor, which does not result in any additional cost or loss of time or resources for their intended purpose, is permitted.

As part of our commitment to the utilization of new technologies, most of our employees have access to the Internet. Making the Internet a safe, secure, and productive business tool requires a carefully managed mixture of technology, policy, and training. We strive to create the widest access to the Internet and other Information Technology resources in the most efficient way possible with minimal risk to core business systems and sensitive company data.

Artificial Intelligence (AI) Use Policy

Purpose:

This policy sets out clear expectations for the responsible, secure, and ethical use of Artificial Intelligence (AI) tools in the workplace. Adapt supports the use of AI to improve efficiency, quality, and innovation, while ensuring compliance with applicable federal and Michigan law, including employment, privacy, and anti-discrimination requirements.

Scope:

This policy applies to:

- All employees, contractors, and temporary staff working in or for the organization
- All AI tools used for work purposes, including publicly available tools (e.g., generative AI), vendor-provided AI features, and internally approved AI systems
- All devices, networks, and work locations, including remote and hybrid work

This policy is not intended to create, nor should it be interpreted as creating, an employment contract, express or implied. Employment with Adapt remains **at-will** as defined under Michigan law.

Definitions:

Artificial Intelligence (AI): Systems or tools that generate, analyze, summarize, transform, or predict content using algorithms or machine learning.
Approved AI tools: AI systems that have been reviewed and authorized for business use by the organization.
Public AI tools: External AI services not formally contracted or approved by the organization.
Sensitive data: Confidential or restricted information, including personal data, client data, financial information, credentials, intellectual property, or non-public business information, as defined by Michigan and federal law.

Acceptable Use:

Employees may use AI tools to support legitimate work-related activities, such as:

- Drafting or summarizing documents
- Brainstorming ideas or improving written clarity
- Analyzing non-sensitive data
- Automating routine or administrative tasks

All AI-generated output must be reviewed by a human before use or distribution. Employees remain fully accountable for the accuracy, quality, legality, and appropriateness of their work, consistent with Michigan consumer protection and employment laws.

Prohibited Use:

Employees must not:

- Enter sensitive, confidential, or personal data into unapproved AI tools
- Use AI as the sole or final basis for employment-related decisions, including hiring, promotion, discipline, termination, scheduling, or compensation
- Use AI systems in a way that may result in unlawful discrimination under the Michigan Elliott-Larsen Civil Rights Act or applicable federal law
- Represent AI-generated content as fully human-created where disclosure is required
- Use AI in a way that is deceptive, unethical, or unlawful
- Circumvent security controls or licensing restrictions

Data Privacy and Security:

- Only minimum necessary data should be used when interacting with AI tools
- Personal and confidential data must be anonymized or excluded unless the tool is explicitly approved for such use
- AI tools must not be used to store or retain company personal information without authorization
- Adapt will comply with Michigan data breach notification requirements under the Identity Theft Protection Act (MCL 445.61–445.79c)
- Any suspected data exposure or security incident must be reported immediately

Monitoring and Transparency:

Consistent with Michigan law, the organization may monitor the use of AI tools and company systems for security, compliance, and operational purposes. Employees will be informed of applicable electronic monitoring practices as required by state law.

Employees should disclose the use of AI where:

- AI materially contributed to client interactions or how services are delivered
- Required by contract, law, or professional standards
- Requested by management or regulatory authorities

Ethical Use:

AI must be used in a way that:

- Avoids bias and discrimination
- Respects intellectual property and copyright
- Supports fairness, accountability, and professional judgement

AI is an assistive tool and does not replace human oversight, decision-making responsibility, or compliance obligations. All AI material must be vetted and verified by the responsible employee.

Training and Guidance:

The organization may provide training and guidance on approved AI tools and responsible use. Employees are expected to stay informed of policy updates and comply with related procedures, particularly as Michigan AI-related regulations evolve.

Compliance and Enforcement:
Failure to comply with this policy may result in disciplinary action, up to and including termination of employment, consistent with Michigan's at-will employment framework and applicable law.

Review and Updates:
This policy will be reviewed regularly and updated as AI technology, Michigan legislation, or regulatory guidance evolves.

Reporting:
Employees who become aware of suspected misuse, non-compliance, or security concerns related to AI tools must promptly report the matter to their supervisor or the Adapt Compliance Officer. All reported concerns will be assessed and addressed in accordance with Adapt's policies and procedures.

Cell Phones

For purposes of this policy, the term "cell phone" is defined as any handheld electronic device, including wristwatches, with the ability to receive and/or transmit voice, text, or data messages without a cable connection.

Cell phones are to be turned OFF during working hours. Cell phones may be accessed during approved breaks only. The home/office phone may be used for personal calls only in case of an emergency or with specific approval from your supervisor. Excessive personal calls during the workday, regardless of the phone used, can interfere with employee productivity and the quality of care provided to the people served in the home/program. Therefore, employees are expected to limit personal calls during the workday as much as possible.

Safety Issues for Cellular Phone Use

Employees whose job responsibilities include regular or occasional driving are expected to refrain from using their phone while driving. Safety must come before all other concerns. Regardless of the circumstances, including slow or stopped traffic, employees are required to pull off to the side of the road and safely stop the vehicle before placing or accepting a call. Under no circumstances are employees allowed to place themselves at risk to fulfill business needs. Vehicles will have a cell phone available for emergency use only. All calls made with this cell phone must be logged on to the mileage sheet.

Employees whose job responsibilities do not specifically include driving as an essential function, but who are issued a cell phone for business use, are also expected to abide by the provisions above. Under no circumstances are employees allowed to place themselves at risk to fulfill business needs. Employees who are charged with traffic violations resulting from the use of their phone while driving are solely responsible for all liabilities that result from such actions.

Social Media

We encourage employees to share information with co-workers and with those outside the company for the purpose of gathering information, generating new ideas, and learning from the work of others. Social media provides inexpensive, informal, and timely ways to participate in an exchange of ideas and information.

However, information posted on a website is available to the public, and therefore, the company has established the following guidelines for employee participation in social media.

Note: As used in this policy, "social media" includes, **but is not limited** to, blogs, forums, and social networking sites such as Twitter, Facebook, Snapchat, LinkedIn, TikTok, Instagram, etc.

Off-duty use of social media. Employees may maintain personal websites or web logs (blogs) on their own time using their own facilities. Employees must ensure that social media activity does not interfere with their work. In general, the company considers social media activities to be personal endeavors, and employees may use them to express their thoughts or promote their ideas, provided they do not conflict with company policies or business.

On-duty use of social media. Employees may not engage in social media activity during work time. Any exception to this rule must be made by the Executive Director, or Designee, prior to engaging in activity.

Respect. Demonstrate respect for the reputation of the company, its owners, its customers, its vendors, and its employees. A social media site is a public place, and employees should avoid embarrassing readers, company employees, consumers, vendors, or other stakeholders. Do not use ethnic slurs, personal insults, or obscenity, or use language that may be considered inflammatory. Even if a message is posted anonymously, it may be possible to trace it back to the sender.

Post disclaimers. If an employee identifies himself or herself as a company employee or discusses matters related to the company on a social media site, the site must include a disclaimer on the front page stating that it does not express the views of the company and that the employee is expressing only his or her personal views. For example: "The views expressed on this website/web log are mine alone and do not necessarily reflect the views of my employer." Place the disclaimer in a prominent position and repeat it for each post expressing an opinion related to the company or the company's business. Employees must keep in mind that if they post information on a social media site that is in violation of company policy and/or federal, state, or local law, the disclaimer will not shield them from corrective action.

Competition. Employees should not use social media to criticize the company's competition and should not use it to compete with the company.

Confidentiality. Do not identify or reference agency consumers, stakeholders, co-workers, or vendors without express permission. Do not post pictures of consumers/persons served on the Internet without express permission from the consumer, the legal guardian and ADAPT management. Posting pictures of consumers/persons served on the Internet without these permissions is a violation of Recipient Rights. Employees are prohibited from taking pictures of consumers with personal cell phones unless the proper prior approval has been obtained from the supervisor, consumer, and guardian, if applicable. Do not post pictures of company property or co-workers on the Internet without express permission. Employees may write about their jobs in general but may not disclose any confidential or proprietary information. For examples of confidential information, please refer to the company non-disclosure policy.

New ideas. Please remember that new ideas related to work, or the company's business belong to the company. Do not post them on a social media site without the company's permission.

Discipline. Violations of this policy may result in discipline up to and including the immediate termination of employment.

Note: Nothing in this policy is meant to, nor should it be interpreted to, in any way limit your rights under any applicable federal, state, or local laws, including your rights under the National Labor Relations Act to engage in protected concerted activities with other employees to improve terms and conditions of employment, such as wages and benefits.

Sleeping on Duty

Sleeping on the job is not permitted and is grounds for termination.

Smoking/Tobacco Products/E-Cigarettes/Vaping

Smoking is prohibited in all ADAPT facilities and vehicles. Employees are not permitted to smoke when engaged with consumers or within 15 feet of non-smoking consumers or entrances to buildings/homes. The sale of smoking products at all ADAPT worksites is prohibited. Electronic Cigarettes (E-cigs, personal vaporizers/vaping, etc.) are to be handled the same way as a traditional tobacco-filled cigarette. (Please see the policy on Employee Breaks for further information regarding smoking breaks.)

Employees are prohibited from using tobacco and other such products while on duty. All tobacco products should be inaccessible by persons served in the home or program. The sale of tobacco products at all ADAPT worksites is prohibited.

In keeping with the 15-foot distance rule of consumers and entrances to ADAPT homes/buildings, employees should use the cigarette receptacles available and must be readily available to assist their co-

workers if the need arises. Employees should be visible to their co-workers who request urgent assistance and must be within hearing distance. This is a paid break and the need to be immediately available to assist is required. During inclement weather, employees may smoke or take their break in their vehicles but must be able to hear their co-workers if they are called. Employees should keep their vehicle radio either off or extremely low and have a window cracked open so they can hear outside of their vehicle. The employee must position him/herself in the vehicle where they are visible to co-workers.

Employee Breaks

In the residential sites, only one (1) employee is permitted to take a break outside of the home (to smoke, check cell phone, etc.) at a time, and only after it has been determined to be safe and not disruptive to the operation of the home or the residents' routine. This determination will be made with the other employees on duty/supervisor working in the home and depends on the circumstances in the home at any given time. **There should NOT be a time when all employees on duty are outside of the house at the same time and residents remain in the home unsupervised**. In situations where a home only has one (1) employee scheduled at a time, arrangements will be made for the employee to smoke outside on a case-by-case basis, depending on the needs of the residents living at that site. Each site that scheduled one (1) employee at a time will have a protocol to follow for taking a smoking break.

Day services employees will take breaks according to the needs of the people served in the program and the overall operation of the program. The program supervisors will make decisions regarding the number of employees permitted to take breaks at the same time. As a general rule, no more than half of the day services employees are permitted to take a break outside of the building at the same time.

Employees should avoid smoking breaks while being responsible for transporting consumers. If a break is needed due to the length of time of an outing, only one (1) employee is permitted to take a smoking break outside of the vehicle at a time. If only one (1) employee is transporting consumers, smoking should be avoided. If the outing is long and a break is necessary, the employee will look at all consumers in the vehicle prior to exiting the vehicle in order to do a safety check, turn the vehicle off, have the key to the vehicle in hand, have "eyes on" the consumers in the van the entire time of the break, and keep the break as short as possible.

Employees who work in an office setting or do not provide direct care to consumers in ADAPT programs will have breaks available according to the workflow of their position and the overall operation of the office or their work environment. In such situations, the supervisor will determine the availability of employee breaks.

Employee Visitors/Special Events

Employees are prohibited from receiving visitors while at work unless prior approval has been obtained from the supervisor.

During Special Events offered by the organization, employee's family members may be invited to an ADAPT home or facility, or other community location. Children should remain under constant visual supervision by their parent or caregiver. An employee who is working a scheduled shift should not have their children at the event unless there is another adult present to take responsibility for them. It is not our intention to discourage the presence of children during appropriate occasions or activities, however, ADAPT cannot assume responsibility for their supervision.

In the event of an environmental, behavioral, or medical emergency, please be prepared to remove any visiting children from the site, if appropriate, for their protection and the protection of others.

Visiting Adapt Sites and/or Consumer Homes During Non-Work Hours

Employees will not visit an Adapt site (building or home) when they are not working without the prior approval of the supervisor of the program. Employees who are not working will not visit coworkers who are working and should have their attention focused on the people/residents being served. Visits such as these bring about a potential host of liabilities and take away from the mission of Adapt, which is focusing on the people we serve.

Some of the people served by Adapt receive services in their privates homes, apartments, etc. Under no circumstances should an employee who is not working visit another employee who is working in a

consumer's home. Some consumers are served in their home by more than one provider agency. Under no circumstances should an Adapt employee visit an employee from another provider and "hang out" in the consumer's home. Violations of this policy are grounds for immediate termination.

Attendance and Punctuality

- ◊ Upon accepting employment with ADAPT, the employee assumes the personal responsibility of being on the job each scheduled day at the scheduled time.
- ◊ Absenteeism is defined as a failure to report to a scheduled shift exclusive of approved leaves. Tardiness is defined as failure to report to work at the time scheduled.
- ◊ We recognize that occasional absence or tardiness is unavoidable. However, absenteeism and tardiness always cause difficulty in meeting staffing requirements, which is a burden to the employees waiting to be relieved from their shift. Because consumers require 24-hour care, the tardiness of an employee will necessarily force the other employees to continue working for the health, welfare, and safety of the consumer.
- ◊ Employees are expected to inform their supervisor if they will be late or absent as soon as it becomes evident. A minimum of eight (8) hours' notice is required for all residential staff. The employee must call each day if he/she is going to be late or absent. Failure to do so will result in the employee being recorded as "late" or "no-show.' Asking a friend, another employee, or a relative to give notification is not considered acceptable unless the employee is physically unable to contact his/her supervisor.
- ◊ Any employee who is absent three (3) consecutive scheduled workdays without reporting the absence to his/her supervisor will be considered to have voluntarily resigned from ADAPT.

Snow Days/Inclement Weather - Attendance

All employees are expected to report to work in the Residential program due to the nature of the services provided in the homes and the 24-hour staffing requirement. Your supervisor can provide further instruction regarding preparation for inclement weather as a caregiver in an ADAPT home.

Administrative and Day Services employees (Clubhouse, Employment Resources, Day Program) are to report to work unless notified. Employees should check with their supervisor prior to reporting to work. If Administrative/Day Services employees are unable to report to work, they may either use personal time or take lost time without resulting disciplinary action.

Personal Business and Appointments

All personal appointments should be scheduled outside working hours. The use of personal time to attend an appointment that is scheduled during your regular work hours must be approved by your supervisor.

Personal business while responsible for consumers is not permitted unless it meets the following criteria:

- ◊ Would generally be of an incidental nature
- ◊ Must not interfere in any way with the normal course of business
- ◊ Should be related to the purpose of the activity in which the consumers are participating.

Examples of permitted personal business include but are not limited to an employee cashing their own paycheck while taking consumers to the bank to cash their own paychecks, buying a small incidental item while taking consumers shopping, or buying personal souvenirs during a special outing.

Employees should not stop and buy food for themselves while on an outing with consumers if they intend to eat in front of the consumers unless the consumers will also be eating.

Meals

Eating In

Employees are responsible for furnishing their own meals during working hours. Employees shall not consume or use food prepared for consumers/residents except for special occasions such as Thanksgiving, Easter, Christmas, parties, and occasional cookouts. Leftovers from meals are for consumer/resident consumption.

Eating Out

Supervisors are to monitor all meal reimbursements. The general guidelines for resident, consumer and employee meals out are as follows:

- ◊ The meal must be eaten in public and not picked up at a drive-through window. An exception would be if picked up and taken to a park or other event open to other community members. Food delivered to the house, for example, Pizza Hut is NOT to be charged to ADAPT without supervisor approval and the supervisor noting on receipt the reason it was consumed in the home and not in the restaurant. An example would be staff working during a party where food was provided for non-working staff.
- ◊ If everyone in the home is going out as a group, the residents and employees' meals are paid for by ADAPT. The supervisor must approve the outing prior to it happening.
- ◊ If an individual consumer/resident goes out to eat, the consumer/resident pays for his/her own meal. ADAPT will reimburse the accompanying employee up to $12.00 for "fast food" restaurants or $24 for non-fast-food restaurants. Staff should discuss with the supervisor to determine the reimbursement amount prior to going out.
- ◊ On occasion, ADAPT may pay for consumers/residents meal out if it cannot be afforded by the individual and it is approved by a supervisor.

Pet Policy

Pets are allowed in ADAPT homes. Determination as to whether or not to have a pet will be based on the residents' needs and preferences as the sole criteria. No pet that poses a danger to any resident shall be allowed. If a pet is allowed, all licenses and shots must be current, and proof of such available at the site. The final determination as to whether a pet can be obtained will rest with the Director of Services, who will use the needs and preferences of the people living in the home as the primary determining factor. The Home Supervisor will be responsible for ensuring the care of the pet. Employees are not permitted to bring their personal pets to work without specific approval from their supervisor, who will determine if the presence of the pet will benefit the people served in the home/program. If an employee is permitted to bring his/her pet to work, the animal must have all applicable licenses and current rabies vaccination, and proof of such must be at the site for the duration of the pet's visit.

Visiting Pets/Employee Pets/Therapy Pets

Generally speaking, employees are not permitted to bring their personal pets to work without specific approval from their supervisor. If an employee is permitted to bring his/her pet to work, the animal must have all applicable licenses and current rabies vaccination, and proof of such must be at the site for the duration of the pet's visit. This also applies to pets that have a therapeutic value to employees. The supervisor will discuss the need to have the support pet while working and determine the appropriate course of action. The employee must provide documentation from a licensed professional indicating the employee's need to have the pet at work. The supervisor will evaluate the appropriateness of the pet's presence periodically. Management reserves the right to reverse the decision and disallow the pet.

To the extent it is appropriate, residents/persons served should have the opportunity to help care for the pet and interact with the pet keeping in mind ADAPT homes are the residents' homes and our programs exist for the sole purpose of caring for the people we serve.

Chain of Command for Programs

Residential and CLS Programs, In-Home Supports in St. Joe County

Executive Director
Director of Services (for the county)

Residential Program	*CLS Day Programs*
Home Supervisor	Program Supervisor
Shift Leader – Direct Support Professional	Lead Worker (if applicable)
Direct Support Professional	Direct Support Professional

Outlook Clubhouse, In-Home Supports (Branch Co.), Employment Resources, Workshop

Executive Director
Program Supervisor
Generalist (Clubhouse)/Direct Support Professional/Job Coach/Job Developer

Shift Leadership Roles

If more than one (1) shift leader is working on the same shift, the shift leader with the most seniority with the home or program will be in charge of that shift. In the event that no shift leader is working a particular shift, the employee with the most seniority within the specific home or program will be in charge. Exceptions to this policy may be made at the discretion of the Home or Program Supervisor or a member of the Administrative Team and must be clearly communicated to everyone involved. All employees working must be aware of who is the acting shift leader. If there is any doubt about who is the shift leader, employees must contact their supervisor or other authorized individual for a clear designation of leadership.

Promotions

ADAPT supports the promotion of current employees into positions of greater responsibility. Generally, positions are posted. All decisions regarding job postings and promotions are at the sole discretion of management.

Employees are encouraged to gain the skills and abilities necessary to perform a job requiring supervisory ability. Any employee who is interested in advancing within the organization is encouraged to make his/her interest known to his/her direct supervisor as well as the Director of Services for the county in which he/she works. Supervisors will work closely with those staff to assist them in gaining the skills and abilities they would need to advance within the company.

III. CONSUMER RELATED

Individual Plans for Persons Served

The *individual plan document* for each person served is created by the local Community Mental Health (CMH) agency and dictates the services provided. This document may be referred to as the Individual Plan of Service (IPOS), Person-Centered Plan (PCP), or Treatment Plan. Employees must be trained in the individual plan document for all people they serve. Every plan is unique to the person served and outlines the goals and objectives the person served wants to achieve, as well as the services authorized based on the person's needs.

Resident Rights (Licensed Residential Settings)

ADAPT employees receive training on Resident Rights and are expected to honor those rights at all times. Violations of a resident's rights will not be tolerated. Any employee observing a person violating these Resident Rights must first make every effort to protect the resident from further violations and then report it to the administrator/home supervisor or the Recipient Rights Officer immediately and preferably in writing. Residents have the right to voice grievances and make complaints without fear of humiliation and/or retaliation by ADAPT employees. These rights include:

- ◊ The right to be free from discrimination on the basis of race, religion, color, national origin, sex, age, handicap, marital status, or source of payment in the provision of services and care.
- ◊ The right to exercise his or her constitutional rights.
- ◊ The right to refuse to participate in religious practices.
- ◊ The right to write, send, and receive uncensored and unopened mail at his or her expense.
- ◊ The right to reasonable access to telephone for private conversation including long distance and collect calls.
- ◊ The right to voice grievances and present recommendations pertaining to policies, services, and house rules without fear of retaliation.

- ◊ The right to associate and have private communications and consultations with his or her attorney, physician, or any other person of their choice.
- ◊ The right to be free from financial, emotional, sexual, physical, and other forms of exploitation.
- ◊ The right to participate in the activities of social, religious, and community groups at his or her own discretion.
- ◊ The right to use services of advocacy groups and attend other community services of his or her choice.
- ◊ The right to reasonable access to and use of his or her personal belongings and clothing.
- ◊ The right to have contact with relatives and friends and receive visitors in the home at a reasonable time. Exceptions shall be covered in the resident's Person-Centered Plan (PCP).
- ◊ The right to employ the services of a physician, psychiatrist, or dentist of his or her choice for obtaining medical, psychiatric, or dental services.
- ◊ The right to refuse treatment or services, including the taking of medication, and to be made aware of the consequences of that refusal.
- ◊ The right to request and receive assistance from the responsible agency in relocating to another living situation.
- ◊ The right to be treated with consideration and respect, with due recognition of personal dignity, individuality, and the need for privacy.
- ◊ The right to access his or her room at his or her discretion.
- ◊ The records of the consumer that are required to be kept by the licensee under the Adult Foster Care Facility Licensing Act or rules shall be confidential and properly safeguarded as required by the Licensing Act, Section 12(3).

Promoting Personal Choice and Limiting Rights Restrictions (All Programs)

It is imperative that all ADAPT employees strive to ensure the fullest amount of personal choice is afforded to all individuals served, as is the right of every person. **ADAPT employees should possess and promote a mindset that people receiving services need support to make the best possible choices for their lives, and do not have to make perfect choices to retain their rights and personal freedoms**.

ADAPT values the rights of all individuals served, and it is the responsibility of all employees to protect the rights of those we serve in Adapt homes and programs. As a last resort and with the informed consent of the person served and/or guardian, the rights of a consumer may be restricted if deemed necessary to ensure the safety and well-being of that individual, and in accordance with the Community Mental Health (CMH) service planning and delivery team. Further, restrictions will only be implemented after reasonable attempts to maintain the safety of the person served have failed and have been documented by CMH personnel in accordance with the Home and Community Based Services (HCBS) Transition Rule. Restrictions must be written in the current IPOS document and reviewed periodically with the intent of removing the restriction as soon as possible.

Employees will be trained in the proper implementation of a restriction. Employees will continue to use positive behavior interventions, including Mandt techniques, while the restriction is in place. The effectiveness of the restriction, as well as attempts to remove the restriction, will be monitored by the program/home supervisor and communicated to the appropriate CMH personnel. The service delivery team will ensure the restriction is removed as soon as the threat to the consumer's safety and well-being has decreased to an acceptable level or is eliminated. In the case of an emergent or urgent situation, verbal approval may be obtained and documented by the program supervisor or designee, until an IPOS or addendum is received by the ADAPT program supervisor from CMH personnel.

Informed Consent and Choice

Prior to a referral to ADAPT, Community Mental Health (CMH) workers are required to review all available services and providers with individuals being served and their family members/guardians, as applicable. It is up to the person served and/or guardian to choose a provider and agree to the services approved by the CMH agency. Consumers and/or guardians who do not agree with the type and/or amount of services authorized by the CMH may file an appeal.

Upon intake with ADAPT, program personnel will discuss the legal decision-making status of the consumer (guardian, no guardian, payee, etc.) with the consumer, the CMH worker, the legal decision-making authority, and any other individuals, as appropriate or requested by the person served. The scope of the legal decision-making authority will be discussed and how it is related to the consent for services, making choices relevant to daily program participation, and the selection of participants in the consumer's planning meeting. To support ADAPT's mission to promote the fullest level of independence, self-growth, and community integration for all consumers, it is important for consumers to have the maximum level of choice possible. The more decisions an individual can make independently, the more likely that person is to realize his/her maximum potential. The more practice an individual has with making decisions, the better he/she becomes at making decisions.

ADAPT personnel will maintain open communication with the legal decision-making authority (i.e., guardians, payees, Durable Power of Attorney (DPOA's) and will strive to involve the person served in as much decision-making as possible, within legal limits. Further, any consumer who maintains legal authority to make his/her own decisions will be respected as such, with ADAPT personnel recognizing the consumer's full right to make his/her own decisions, whether ADAPT employees agree with the decision or do not. ADAPT personnel will encourage the individual to make healthy and practical choices, providing education and role-playing to support the individual in his/her decision-making process. Consumers and/or family members interested in pursuing guardianship or some other legal decision-making arrangement should seek assistance from the CMH worker.

Written Informed consent is obtained for the following purposes, using the following means:

(1) Consent to participate in the program and work on the individual's program plan is given by the person served through the annual Person-Centered Planning process.
(2) Consent for emergency medical treatment is obtained prior to the consumer starting the program.
(3) Photo or electronic images
(4) Authorization to release, receive, or exchange information with other parties related to the provision of services/care/treatment to the consumer.

Conflict Resolution Within the Program

Each consumer (person served) has the right to appeal against any decision made by an employee. If a consumer questions a statement, decision, or action by an employee, the first step is to discuss the problem with the employee's supervisor. The person or their guardian may request, either verbally or in writing, to appeal that statement, decision, or action. When such an appeal is received, the employee must inform the Executive Director of the request within 3 working days. The Executive Director will then arrange for a hearing between the Executive Director and the consumer, within 3 working days. The decision of the Executive Director is final and will be issued in writing to the consumer within 5 working days.

Consumers are also entitled to present their complaints to a Recipient Rights Officer who can be contacted through their local Community Mental Health agency.

Grievance and Appeals (Service Denial/Changes/Termination)

Consumers of Adapt services, as well as those who apply for Adapt services, have the right to appeal against any decision to deny, change or end services. If a consumer/applicant disagrees with a decision regarding services, the first step is to discuss it with the County Director of Services. If the consumer/applicant is not satisfied with the result of this discussion, a verbal or written request may be submitted to the County Director to appeal against the decision. When such an appeal request is received, the County Director must inform the Executive Director within three (3) working days. The Executive Director will then arrange for an appeal hearing between the Executive Director and the consumer/applicant within three (3) working days. The decision of the Executive Director is final and will be issued in writing to the consumer within five (5) working days.
Consumers are also entitled to present their complaints to a Recipient Rights Officer who can be contacted through their local Community Mental Health Agency.

Rights Policy

ADAPT adheres to the Michigan Mental Health Code's Recipient Rights requirements. Each county's Community Mental Health (CMH) agency has its own procedures, coordinated by that county's Office of Recipient Rights. ADAPT follows the policies and procedures, as required, by all the CMH agencies with which the organization contracts. These include:

Consent for treatment	Comprehensive exams
Sterilization	Entertainment materials, information, and news
Fingerprinting, photographing, audio taping, and use of 1 way glass	Freedom of movement
Abuse and neglect	Resident labor
Treatment by spiritual means	Communication and visits
Qualifications for training the right staff	Restraint and seclusion
Changes in the type of treatment, medication procedures	Dignity and respect
Use of psychotropic drugs	Least restrictive environment

Consumers who are in programs funded by Michigan Rehabilitation Services (MRS) are also covered by their "Client Assistance Program" rights protection mechanisms. ADAPT's Personnel Policies cover the ADAPT policies on several key rights-related issues, including Recipient Rights, Abuse, Neglect, Mistreatment, Incident Reports, Staff/Consumer Relationships, and Confidentiality. All service recipients have the right to voice grievances and make complaints without fear of humiliation and/or retaliation by ADAPT employees.

Abuse/Neglect

This is ADAPT's summarized Abuse/Neglect Policy which gives the employee direction on how to intervene and proceed when Abuse/Neglect is suspected. ADAPT has extensive Abuse and Molestation Prevention Policies separate from the Personnel Policies Manual.

All suspected abuse and or neglect must be reported, at a minimum, verbally, and preferably, in writing to the Supervisor, Administrator or the Executive Director immediately. (*Note: In both counties, the "Administrator" is the Director of Services.)

- ◊ As an employee of ADAPT, it is your duty to intervene immediately and put a stop to observable abuse and/or neglect.
- ◊ As an employee of an entity (ADAPT) under contract with a Mental Health Agency, if you have reasonable cause to suspect the abuse and/or neglect of a consumer, you shall immediately make or cause to be made, by telephone or otherwise, an verbal report of the suspected abuse or neglect to Children's Protective Services (CPS) or Adult Protective Services (APS) at the Department of Health and Human Services (DHHS), the law enforcement agency of the county, or city, in which the abuse or neglect is suspected to have occurred or to the State Police, and to the County's Community Mental Health Office of Consumer Rights or its Chief Executive Officer (CEO). A report of abuse or neglect is not required if the employee has reported the incident to their supervisor and has knowledge that the suspected abuse or neglect has been reported to the appropriate agency.
- ◊ Within 48 hours a written report shall be filed with the appropriate agencies and/or the licensee.
- ◊ A person who makes the report of abuse or neglect will not be dismissed or otherwise penalized for making the report unless he or she is the cause of the abuse or neglect. The report of abuse or neglect shall be confidential and subject to disclosure only with the consent of that person or by judicial process.
- ◊ The following abuse that is required to be reported is: assault, assault and battery, sexual intercourse under the pretext of medical treatment, murder, manslaughter, criminal sexual conduct including sexual penetration, criminal sexual contact, and assault with intent to commit sexual conduct including penetration.
- ◊ The following constitutes neglect and is required to be reported. Harm or threatened harm to an individual's health or welfare that occurs through either of the following: negligent treatment, including the failure to provide adequate food, clothing, shelter, or medical care. Placing an individual at

unreasonable risk to their health or welfare by failure to intervene to eliminate that risk when that person is able to do so and has or should have knowledge of the risk.

The procedure for reporting abuse to the appropriate law enforcement agency does not include an assault or assault and battery which is committed by a consumer against another consumer. This type of incident must still be reported to the Supervisor, Administrator, or the Executive Director.

All the above must be reported by the licensee to Adult Foster Care Licensing, the Community Mental Health's (CMH's) Office of Recipient Rights for the county, and other appropriate governmental agencies.

CMH's Office of Recipient Rights will investigate the abuse and/or neglect charges and ADAPT will take appropriate action to protect consumers, including reassigning or removing suspected staff during the investigation.

It is ADAPT's intention to strictly adhere to all current and future policies and procedures pertaining to consumer's rights as approved by the Department of Mental Health and/or their respective Community Mental Health agency.

Mistreatment

Employees will not mistreat any person served. Mistreatment is defined to include any action or omission that exposes a person receiving services to serious risk of physical and/or emotional harm or the infliction of pain by any means.

Employees will not:

- ◊ Use any form of physical force other than approved physical management, and only when necessary.
- ◊ Restrain a consumer's movement by binding or tying or through the use of medication, paraphernalia contraptions, materials, or equipment for the purpose of immobilizing a consumer.
- ◊ Confine a consumer in an area, such as a room where egress is prevented (seclusion), in a closet or in a bed, box, or chair or restrict a consumer in a similar manner.
- ◊ Withhold food, water, clothing, rest, or toilet use.
- ◊ Denial of shelter, clothing, or essential personal needs
- ◊ Denial of essential program services
- ◊ Excessive chemical, mechanical, or physical restraint
- ◊ Allow or Promote a consumer disciplining another consumer
- ◊ Subject a consumer to any of the following: Mental or emotional cruelty, verbal abuse, and/or derogatory remarks about the consumer or members of his or her family, threats.
- ◊ Denial of visits or communication with family unless stated in the IPOS. There are times when a guardian is not a family member and family members are prohibited from having contact with the person served.
- ◊ Denial of opportunity for at least 8 hours sleep in a 24-hour period.
- ◊ Refuse the consumer entrance to a home or program for which he/she meets the criteria.
- ◊ Isolate a consumer by complete and unattended separation from staff and other consumers.
- ◊ Use of any electrical shock device.

Behavioral management plans utilized by ADAPT will include positive reinforcing components and must meet with the approval of the Behavior Treatment Committee (BTC) at the respective CMH agency. The approval and use of a Behavioral plan must be included in the IPOS written by the CMH agency. CMH personnel are responsible for training Adapt employees in the proper implementation of the Behavior Plan.

ADAPT utilizes the MANDT behavioral management system. ADAPT will provide MANDT training to employees in the appropriate programs and in sufficient numbers to ensure coverage.

Religious Practices

Upon request of the resident (or guardian of a resident) of the ADAPT Residential program, ADAPT will make every effort to ensure the resident has the opportunity to participate in religious activities and services in accordance with his/her own faith.

Privacy

In general, all employees should knock on a door that is closed prior to opening the door in any ADAPT home or building. All consumers should be taught and encouraged to knock on closed doors prior to entering. After knocking on the door, allow time for occupants to respond before entering the room. Respect each individual's privacy at all times. Residents and program participants are entitled to the private use of bathrooms. For example, there should not be a male/female in the same bathroom or two (2) males/two (2) females in the same bathroom at the same time. Whenever possible, consumers will receive assistance with intimate personal hygiene (bathing, toileting, dressing etc.) from an employee of the same gender.

Access to Consumer Records

Employee Access to Records

Access to consumer records is limited to program supervisors, administrative staff, and others with a legal right to access the records. Other employees may be given access with the permission of their program supervisor if there is a "need to know" the information in the record.

Consumer Access to Records

Information to be released to the individual may only be information generated by ADAPT. Any additional information must be requested through the process of the agency involved. For example, the Person-Centered Plan (PCP) document should be requested from the CMH agency that created it.

The person served or guardian will request specific information in written form. ADAPT will be allowed five (5) days to respond to said request and schedule an appointment with the person served or guardian to review the information. The Director of Services will review the record, deleting information from other sources that ADAPT is not authorized to release. The individual will view the record in the presence of the Director of Services or designee. Under no circumstances will the person served be left alone with the record or will the record be removed from the premises. The individual may request photocopies of materials from the record and may be charged $.10 per copy, or the prevailing rate, if higher per page.

Incident Reports

The purpose of completing an Incident Report is to assure timely review and consistency in reporting unusual incidents involving a consumer that potentially disrupts the health and/or safety of the consumer, the normal and desired routine of the consumer, and/or the effective management or administration of the home or program. All unusual incidents must be reported, reviewed, and investigated, as needed, so that remedial action is taken to ensure the safe and humane treatment of the person served, and appropriate intervention to reduce future risk to the person served and others.

The following types of unusual incidents must be reported: Unusual Behavioral Incidents, Unauthorized Leave of Absence (ULOA), Abuse, Neglect, Exploitation, Physical Injury, Medication Errors, Unusual or Serious Medical Events, Illness Requiring Hospitalization, Property Destruction, Death, Sexual Abuse or Contact, Assault, or a Criminal Offense involving a consumer. This is not a complete list but examples of the types of unusual incidents that require a written incident report.

Employees shall immediately report all unusual incidents on the "Incident Report" form. Reports should be complete, detailed, clear, and concise. (See the form for items which must be recorded.) If two or more employees witness an unusual incident and they do not concur, each employee will complete a separate report. **All incident reports must be written legibly. If the Rights Officer or other reviewing party cannot read the report, the employee will need to rewrite the incident report.**

Employees should provide for the protection and comfort of, and assure treatment for the consumer, at all times.

Submit all incident reports to the Director of Services for the county. Reports will be routed from this point to Licensing (LARA), as directed by the Licensing Consultant, and as directed by the Office of Recipient Rights for the county.

If the incident involves suspected Abuse, Neglect, Serious Physical Injury, Illness Requiring Hospitalization, Death, Sexual Abuse or Contact, Assault, or a Criminal Offense involving a consumer all the previous steps should be taken as well as the following additional steps:

- Notify the Home or Program Supervisor, or Administrative staff IMMEDIATELY and be prepared to give the Incident Report to the Supervisor or Administrative staff prior to the end of the shift.
- The guardian must be notified in a timely manner.
- The Supervisor or Administrative staff will notify the Office of Recipient Rights of all allegations of Abuse, Neglect, or other Rights Violations.
- The Supervisor or Administrative staff will report allegations of criminal offenses against a consumer to the appropriate law enforcement agency.
- The Supervisor or Administrative staff will report violations of AFC Licensing Rules to the Licensing Consultant.

The responsibility of the supervisor to report these incidents does not limit the right or responsibility of any employee or interested party to file complaints with the Office of Recipient Rights, AFC Licensing/LARA, or appropriate law enforcement agency.

Employees are trained in procedures for Incident Reporting as part of their Recipient Rights training within 30 days of hire.

Incident reports shall be reviewed, analyzed for facts, causes, trends, and data aggregated at least quarterly. A member of the Administrative staff will conduct the reviews. Actions that can be taken to reduce risk will be identified as they occur and at the time of the review and summarized in the review. A record of such actions, including implementation, will be included in the review. These quarterly reviews will be submitted to the Safety Committee Chair.

Visitors

Consumers are allowed visitors of their choosing unless the consumer's record contains documentation that visits by certain individuals are detrimental to that person's well-being and prohibited. The decision to deny visitation on this basis must be outlined in the IPOS document. Further, any restrictions on visitors or visitation outlined in the IPOS document must meet the standards of the Home and Community Based Services (HCBS) Transition Rule, whereby all other means of protecting the person served from the visitor(s) in question have been exhausted.

The consumer's regular routine should be preserved as best as possible regarding essential care and treatment. However, an interruption of the "regular routine" is what happens in life and the person served should make the choice regarding the interruption of his/her daily routine. Employees will make every effort to promote natural and supportive relationships in each consumer's life; a visitor to the home should be welcomed. Whenever any individual wishes to take a consumer away from the home for a visit or activity, the appropriate section of the *Consumer Inspection/Leave* form must be completed. Upon arriving home from the visit, that portion of the *Consumer Inspection/Leave* form must also be completed.

Visitor ID

Anyone wishing to enter an ADAPT site for any reason should be asked for proper identification and why they wish to enter the premises. Any person who states he/she is from an agency ADAPT works with will typically have agency issued identification.

Under no circumstances should anyone be allowed into an ADAPT home without being properly confirmed by an employee. All visitors must sign in. If you are ever unsure about allowing someone to enter the home, contact your Home Supervisor or the Director of Services for the county for verification. The employee who ensures the proper identification of a visitor is fulfilling their responsibility to keep the premises and people safe. An employee who acts diligently and respectfully which results in the delay of visit/entrance to a home or building, will receive support from supervisory and administrative staff and not receive any type of reprimand.

Health and Safety

Every effort will be made by ADAPT personnel to ensure employees and persons served have a safe environment in which to work and receive services. The Executive Director, or designee, will ensure ADAPT complies with all OSHA and MIOSHA standards. A safety committee oversees the safety program, with a chairperson ensuring all aspects of safety are addressed in a timely manner. Regarding the workshop, all equipment must be grounded and guarded, safety glasses must be worn when appropriate to the task, and aisles must be free of obstructions. ADAPT will maintain clean and safe facilities and homes. Specific policies address the various aspects of the safety program.

Employees are expected to perform emergency services. Emergency services are those defined as actions/services that are immediately necessary for the well-being of persons served and co-workers, such as crisis intervention.

General Emergency Response

Below is a very general response to what is expected of employees during a situation that is perceived to be an emergency:

- REMAIN CALM
- ASSESS THE SITUATION
- CALL FOR STAFF ASSISTANCE
- FOLLOW ALL INFECTION CONTROL GUIDELINES
- FOLLOW PROCEDURES LEARNED IN TRAINING

Each program has an Emergency manual (typically red) with specific response plans for various emergencies, including fires, tornados, thunderstorms and lightening, water shortage, power outage, workplace violence, bomb threat, carbon monoxide, heating failure, gas leak, flood, heavy snow/blizzard, poisoning, Unauthorized Leave of Absence (ULOA), and the need for alternate housing. Each employee must be familiar with the emergency procedures of the setting in which they work.

Non-Emergency Response

- Assess the situation.
- Call for staff assistance, if needed.
- Remove injured person to quiet area or move others from the area.
- Apply basic first aid, follow all infection control guidelines.
- Notify home provider/guardian if a consumer is involved.
- Complete either the Employee or Consumer Incident Report form, or both, as appropriate.
- Follow specific homes/program procedures.

Medical Emergency

- In case of a medical emergency, provide immediate first aide to the extent of your training.
- Call out for help. Have your coworker assist by calling the nurse or the ambulance (911). If no assistance is available, immediately provide first aide then call for help.
- Contact the home supervisor and/or other ADAPT emergency contact numbers. The following people should be notified: Guardians/Parents, case manager, CMH hotline (if after business hours) and anyone else who has the type of relationship with the injured party that warrants immediate notification.
- If there is more than one employee available at the time of the emergency, then one of them should accompany the affected person in the ambulance, if it is safe to leave one employee in the home or program with the number of remaining consumers.
- Make certain that the consumer's medication list, known allergies, and insurance card are taken to the hospital.
- An unusual incident report should be written as soon as possible after the emergency has been properly addressed.

Choking Incident

- In the event of a Choking Emergency, staff will immediately CALL 9-1-1 and provide first aid care to the extent of their training. Once EMS has arrived and taken over and/or if the object is dislodged, it is required that the individual be observed by a medical professional and get a chest X-ray done to check for aspiration (inhaling food or liquid into the lungs), or injury that may have occurred from back blows or abdominal thrusts. If the medical professional does not initiate the ordering of a chest X-ray, the employee present and advocating for the person who choked, must request an X-ray be done. If the medical professional refuses the request, the employee will contact their immediate supervisor and report on the situation. The supervisor will intercede and attempt to obtain the X-ray order from the medical professional. If Adapt personnel are unable to obtain the X-ray order because the attending physician making the decision disagrees, the guardian (as applicable) and Community Mental Health personnel will be notified, which may include a verbal report to the Office of Recipient Rights. Adapt's Nurse will also be notified of the situation and may be enlisted to communicate with the attending medical professional.

Transportation of Consumers

These Guidelines and policies apply to all vehicles in which people served by ADAPT are transported.

- Requirements for Drivers: It is the policy of ADAPT that all staff and drivers of ADAPT'S vehicles, or when using their own vehicles to conduct business for ADAPT, shall have a valid operator's license, be insurable under the employer's insurance policy, or when using their own vehicles, have proper and adequate automobile insurance, and meet other criteria described below.
  Staff is defined to mean any individual who may be required to transport a consumer in an employer's vehicle, including emergency situations, or who use their own vehicle to conduct business for ADAPT.
  Staff and Drivers agree to advise ADAPT of any traffic tickets or other citations involving an automobile in which staff or driver are found to be responsible, at fault, or guilty. ADAPT also will conduct periodic (at a minimum annually) checks with the Department of Motor Vehicles for moving violations.
  An employee who becomes incompetent to drive or is impacted by a mental or physical infirmity will not be permitted to drive ADAPT'S vehicles, provided such disability constitutes a threat to public safety. Evaluation of competency or ability will be determined by appropriate medical opinion. ADAPT reserves the right to deny employment or to terminate employees whose driving record or driving ability is believed to pose a threat to the safety of consumers, or limits consumer's participation in activities.
- Under ordinary circumstances, possessing a driver's license is a minimum requirement of ADAPT employees. During times of severe staffing shortages, individuals may be hired without a license. In most cases, these employees are expected to work the night shift where there is typically a minimal need to drive for work activities. Employees without a driver's license typically do NOT work in homes where they are the only employee scheduled. ADAPT management reserves the right to reassign employees without a license where it is strategically best. Further, there is no "grandfathering in" of employees who do not have a license. ADAPT must make the best staffing decisions for the people we serve and may reassign or terminate employees who do not have a driver's license. Employees who do not have a driver's license are encouraged to take steps to obtain a license and should notify their supervisor if they are working toward obtaining a driver's license.
- Seat belts: The driver of each vehicle is responsible for the safety of his or her passengers. Therefore, it is the policy of ADAPT that all occupants in any vehicle must be properly restrained; using restraint systems, any time a vehicle is in motion.
- Cell phone use: Cell phone usage while driving is strictly prohibited. In an emergency, other staff in the vehicle should make any necessary phone calls, or the driver should pull safely to the side of the road or in a parking area before placing a call. Use of cell phones for personal business is not permitted. Cell phones are available in ADAPT vehicles for emergency use only. All phones have the capability to call 911. All phone calls made with the vehicle cell phone must be logged on the vehicle mileage form. Drivers will ensure the emergency phone is properly charged prior to departing for the outing.

- Smoking: Smoking while in an ADAPT vehicle is prohibited (including vaping and chewing tobacco, etc.).
- Assistance to consumers: It is the responsibility of the driver to assist consumers in need with entry and exit from vehicles. Assistance will be provided to those consumers who are susceptible to injury due to age, physical condition, or adverse weather conditions.
- Vehicle Speed and Parking: In order to ensure the safety of consumers and employees, all ADAPT vehicles travel at or below the posted speed limits. Each ADAPT building shall have designated parking areas. ADAPT staff, whether transporting consumers or not, are expected to comply with neighborhood speed limits and parking regulations. Practice **Defensive Driving** at all times.
- Accidents: All accidents and/or incidents involving ADAPT vehicles must be reported immediately to the police and the supervisor. Failure to do so may result in disciplinary action. A written Vehicle Incident Report form must be completed and submitted to the supervisor or the Director of Services for the county. Employees need to write Incident Reports on any consumer involved in an accident.
- Road Emergencies/Mechanical Failures: In case of a mechanical breakdown, if a phone is nearby the driver will ensure that consumers aboard the vehicle are secure and safe, they then will notify ADAPT administration for instructions/assistance. If a phone is not nearby or if the consumers aboard the vehicle cannot be briefly left alone (persons served who have unsupervised periods of time written into their IPOS document), the driver will raise the vehicle hood, put out the hazard signal, and wait for help. If anyone aboard the vehicle is injured, emergency help shall be sought immediately. **In case of an emergency, each vehicle is equipped with a cell phone. It is the driver's responsibility to ensure the emergency cell phone on the van is charged prior to departing for the outing.** In most situations, drivers have their own cell phone that can be used to call for help.
- Vehicle Condition and Operation: The driver is responsible for reporting any mechanical or structural problems encountered. Basic Interior cleanliness of the vehicle is the responsibility of the driver. Litter should not be allowed to accumulate on the floor and clipboards and reports shall be maintained and stored properly. Home and program supervisors are required to check vehicles regularly and ensure the vehicle(s) are clean.
- Vehicle environment: ADAPT strongly encourages passengers to talk and enjoy themselves. The driver is an important part of this and should seek to establish a warm and positive relationship with and among consumers. This involves greeting the consumers, active and sincere discussion with them while in the vehicle, allowing their input with regard to radio station selection, climate control, etc. Consumers shall be treated with courtesy and respect at all times. The driver is expected to maintain an orderly and safe environment in the vehicle. Other employees in the vehicle are expected to assist with maintaining a safe and comfortable environment.
- While providing transportation, the safety of ADAPT's consumers rests in the hands of the driver. The above guidelines and policies are intended not only for the protection of consumers but also for the driver and co-workers. Responsibility for enforcement of the above guidelines shall rest with the driver and employees who are passengers are expected to ensure all guidelines are followed and assist the driver in maintaining order, safety, and comfort for all passengers.

Medical Emergency Response While in Transit

- Pull over to the side of the road and Remain Calm
- Assess the situation
- If appropriate, transport the person having the medical episode to the hospital
- If necessary, call 911 using the emergency phone provided
- Implement any necessary first aid procedures as trained (follow infection control guidelines)
- Provide the EMT with all relevant information, including the information we keep in the emergency bag
- If there is more than one employee and a consumer is having the medical emergency, send one employee with the consumer in the ambulance, if the remaining consumers can be safely cared for by the remaining employees
- As soon as it is practical contact Supervisor or other management personnel

Behavioral Emergency Response While in Transit

- Pull over to the side of the road
- Remain calm
- Assess the situation
- If necessary, get others out of the vehicle
- Utilize skills obtained through training and experience in an effort to bring things under control
- If the situation is severe and people are being placed at risk, call 911 using the emergency phone provided
- As soon as practical, contact Supervisor or other management personnel

Use of Employee Personal Vehicle While Working for ADAPT

The following policy has been established to encourage safe operation of vehicles, and to clarify insurance issues relating to drivers and ADAPT, Inc.

- All drivers must have a valid driver's license.
- Motor Vehicle Records will be checked periodically. Driving privileges may be suspended or terminated if your record indicates an unacceptable number of accidents or violations. Should your record fall into our insurance carrier's guidelines of an 'unacceptable driver,' your employment may be terminated.
- You must notify your supervisor of any change in your license status or driving record.

When operating your own vehicle for ADAPT, Inc.:

- Your Personal Auto Liability insurance is the primary payer. ADAPT, Inc.'s insurance is in excess of your coverage.
- ADAPT is not responsible for any physical damage to your vehicle. You must carry your own collision and comprehensive coverage.
- You should carry at least $300,000 per occurrence liability coverage.
- Report your mileage for expense reimbursement.
- You must have a complete emergency kit available, which will be provided to you by your supervisor.

In the event of an accident:

- Take necessary steps to protect the lives of yourself and others.
- Comply with police instructions.
- Do not assume or admit fault. Others will determine liability and negligence after thorough investigation.
- Report the accident to your supervisor and/or the ADAPT office in your county as soon as possible. Complete the required documentation, such as an Incident Report, as directed by management.

IV. BENEFITS

Work Schedules

Employees will be scheduled as necessary to ensure adequate staffing of regularly scheduled agency programs. The work schedule will depend on the specific needs of the individuals being served in the program/home.

It may become necessary, on occasion, for an employee to work beyond their normal weekly hours. This request will be made by the supervisor or the Director of Services for the county and is to be used only to perform those functions which were unable to be carried out during the normal working period. Additional work time must be approved by the supervisor or the Executive Director. This time will be compensated as described under Overtime and Compensatory Time.

Lost Time

The use of lost time to cover shifts not worked is unacceptable and grounds for dismissal. Employees are expected to work the shifts they are assigned unless they have personal time available and have permission from their supervisor or have been granted an approved leave of absence. A Request for Time-Off must be completed and approved for planned absences. It is the responsibility of each employee to manage his/her personal time so that hours are available to cover all needs for time-off requests. Employees who are in jeopardy of being in lost time will often have opportunities to pick up shifts elsewhere in the agency or in the program in which they work. Employees are encouraged to seek additional hours to avoid being in lost time, especially when they know in advance of the end of the pay period. Employees may NOT opt to be in Lost Time and save Personal Time hours for time off in the future.

Pay Period/Payday

- Payroll will be issued bi-weekly.
- The workweek shall be defined as 7 consecutive 24-hour periods beginning Sunday and ending Saturday.
- The pay period shall be defined as 2 consecutive work weeks.

ADAPT issues payroll by Direct Deposit; this is discussed and the appropriate paperwork is issued to each employee upon hire. We understand that situations occur making Direct Deposit not possible. In these cases, a paper check will be written with the understanding that the situation will be resolved as quickly as possible.

An employee, who discovers a discrepancy in his/her pay, must notify the main office of the mistake. **A mistake includes not only being underpaid but being overpaid as well**. If the notification is done by noon on Monday following payday and the mistake is a clerical error, then a new payment will be issued within two business days. If the error is due to the employee's failure to sign in correctly or if the error is not discovered until after 12:00pm (Noon) on the Monday following payday, then the adjustment will be made on the next pay period.

Overtime and Compensatory Time

The nature of the organization's services necessitates that there be flexibility of work, especially for professional staff members involved in direct work with consumers. Workloads, however, are expected to be reasonable and employees should be able to complete their assignments during regular working hours. Administrative staff who must work overtime will be given an equal amount of compensatory time provided that the compensatory time is used within the next pay period. Overtime pay for Administrative staff may be approved on a case-by-case basis. Clerical and Para-professional staff members who must work in excess of forty (40) hours will be compensated on a time and one-half basis.

ADAPT's work period for hourly employee's overtime calculations is based upon a 7-day work period beginning Sunday and ending Saturday. Overtime hours are based on actual time worked. Non-worked holidays and personal time hours are not included when calculating overtime.

Leave of Absences With Pay

With the approval of the Executive Director, absences for the following reasons may be permitted with no reduction of personal time.

- ◊ Pre-Induction Physicals – Employees ordered to report to the Armed Services will be excused for the time needed for such examinations.
- ◊ Illness caused by Immunizations and Tests – Absences caused by illnesses resulting from an immunization or test required as part of the physical examination requirement of ADAPT may be excused.
- ◊ Professional Conferences – Attendance at professional conferences or related meetings, when authorized by the Executive Director, shall be treated as special work assignments.
- ◊ Hearings – The employee will be excused to attend a hearing on a grievance which they have presented to the Board, and also when requested to appear at the hearing of another employee.

- ◊ Emergencies – At the Executive Director's discretion, when employees are prevented from reporting to work due to an emergency their absence may be excused.
- ◊ Jury Duty – Leave shall be granted to any employee who is called for jury duty. The employee shall provide a statement to indicate the total amount of compensation received for jury duty. Employees shall have the option of receiving their normal pay for jury duty or receiving the court rate. If an employee chooses to be paid by ADAPT for jury duty, then the court fee (excluding transportation) shall be turned over to ADAPT. Employees who work the night shift will have their situation determined on a case-by-case basis.
- ◊ Service on Committees – An employee may serve on committees of a community or professional group. The Executive Director must approve such appointments and absences from work.

Leave of Absence (LOA) Without Pay

- ◊ An absence without pay may be granted by the Executive Director (or designee) for not more than one (1) year after careful consideration of the reasons provided in the written request for such leave.
- ◊ A Leave of Absence Authorization form must be completed for all LOA's.
- ◊ LOA approval by the Executive Director (or designee) will specify the duration of the leave, and effects on seniority, personal time, insurance and insurance payments, and other benefits will be detailed. Up to one week of personal time may be retained by the employee with prior approval by the Executive Director (or designee). If the LOA is covered under the Family Medical Leave Act (FMLA), the employee may retain up to 60 hours of personal time. If an employee continues their LOA after they have exhausted their FMLA coverage, the employee must then use their personal time they saved during the FMLA.
- ◊ **Extension of the leave must be requested in writing**. If an employee continues their LOA after they have exhausted their FMLA coverage, the employee must then use any personal time they saved during the FMLA.
- ◊ A return to work earlier than the scheduled termination of the LOA date may be arranged by the Executive Director or designee and the employee if a suitable position is available.
- ◊ An employee on leave without pay may be restored to their former position *or to a similar position* upon expiration of the leave if an opening is available. The employee must notify their supervisor of their intended return date as soon as possible so that suitable arrangements can be made. If the employee does not communicate about dates of return, it is very unlikely a similar position will be available.
- ◊ Employees on leave are responsible for paying their portion of the health insurance premiums when due or coverage will be terminated.
- ◊ Employees are responsible for meeting all requirements specified in this policy and in the manner in which they are outlined. It is imperative employees provide necessary documentation and put requests in writing. Employees must correspond with Administrative staff as requested in order to maintain their employment status. Employees who do not respond to correspondence from Administrative staff will be presumed to have voluntarily resigned from their position.

Family Medical Leave Act (FMLA)

Under the Family and Medical Leave Act of 1993 (FMLA), eligible employees may take unpaid, job-protected leave for certain family-related, medical, or military-related reasons. As described below, leave entitlements vary depending upon the reason for the leave. Eligible employees are those who have worked for ADAPT for at least twelve (12) months, have worked 1,250 hours in the twelve-month period before the leave is to begin, and who work within 75 miles of at least forty-nine (49) other company employees. Except as provided below, ADAPT has chosen a "rolling" 12-month period measured backward from the date an employee uses any FMLA leave to determine when the 12-month period shall begin and end.

Family Leave and Medical Leave: Up to 12 weeks of leave may be taken for one, or a combination, of the following circumstances:

- ♦ To care for the employee's child after birth, or placement for adoption or foster care;
- ♦ To care for a spouse, child or parent who is suffering from a serious health condition;
- ♦ For incapacity due to pregnancy, prenatal medical care of childbirth;
- ♦ For an employee's own serious health condition which prevents the employee from performing his or

her job;
- For any qualifying exigency arising out of the fact that the employee's spouse, son, daughter, or parent is a military member on covered active duty; or
- To care for a covered service member with a serious injury or illness if the employee is the spouse, son, daughter, parent, or next of kin of the service member.

Regardless of the reason(s) for the leave, the maximum amount of leave for these categories is 12 weeks in a 12-month period. Where medically necessary, leave due to a serious health condition may be taken on a reduced schedule or intermittent basis. Leave due to the birth, adoption or placement of a child may only be taken on a reduced schedule or intermittent basis with prior approval. New child leave must be completed within 12 months of birth, adoption, or placement. Where an employee takes leave for planned medical treatment or on an intermittent or reduced schedule basis, the employee must attempt to work with the company to schedule such leave so as not to disrupt the company's operations.

A "serious health condition" is an illness, 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, and that prevents an employee from performing the functions of his/her job or a family member from participating in school or other daily activities. Subject to the requirements of the FMLA, continuing treatment involves a period of incapacity of more than three (3) consecutive calendar days combined with at least two (2) visits to a health care provider or one (1) visit plus a regimen of continuing treatment. It also includes pregnancy and prenatal care, certain chronic conditions, and other conditions that meet the FMLA's requirements.

Military-Related Leave: Employees may take up to twelve (12) weeks of leave because of a "qualifying exigency" arising out of the fact that a spouse, parent, or child of the employee is on covered active duty or has been notified of an impending call or order to covered active duty. Qualifying exigencies must relate to the active duty or call or order to active duty and include such things as: short notice deployment, attending military events and related activities, certain childcare and related activities, care of the military member's parent who is incapable of self-care, making or updating financial and legal arrangements, attending counseling, rest and recuperation, and certain post-deployment activities. Leave may be taken in a single block of time, intermittently, or on a reduced-schedule basis.

Eligible employees may take up to twenty-six (26) weeks of leave to care for a family member (spouse, child, parent or next of kin) who is a current member of the Armed Forces (including the National Guard or Reserves) or a veteran of the Armed Forces discharged within the five-year period before the family member first takes leave and who is undergoing medical treatment recuperation or therapy, is in outpatient status, or is otherwise on the temporary disability retired list, for a serious injury or illness incurred in the line of duty on active duty. A veteran who was dishonorably discharged does not meet the definition of a covered service member. Leave under this category may only be taken during a single twelve-month period beginning from the first date of leave. Leave may be taken in a single block of time, intermittently, or on a reduced-schedule basis.

Total Leave Entitlement: Leave taken for all categories of family, medical, and military leave will be combined toward the applicable 26-week, or 12-week entitlements outlined in this policy. Where a husband and wife both work for the Company, they will be limited to a combined 12 or 26 weeks of leave due to birth, adoption, or placement of a child for foster care, to care for a parent with a serious health condition, or to care for a family member with serious injury or illness arising out of their military service.

Notification & Certification of Need for Leave: When practical, employees are required to give ADAPT at least 30 days' notice of the need for leave. When the need for leave becomes known less than 30 days in advance, you are required to notify the company promptly when the need for leave becomes known. Subject to the above, employees must generally comply with normal absence notification procedures. Failure to provide timely notice may result in the leave being delayed. When the need for leave is unforeseeable, the employee or someone on behalf of the employee must notify ADAPT as soon as possible. Please provide as much information as possible about the reason for leave so that ADAPT personnel can determine accurately and expeditiously whether the leave qualifies under this policy. Calling in "sick" is not sufficient. If a leave has already been approved and the employee subsequently needs time off for that same reason, the employee must specifically inform ADAPT of taking leave for that reason or taking "FMLA leave."

When the need for leave is military-related or due to a serious health condition (the employee's or a family member's), the employee will be required to provide certification of the need for leave and its duration on a form supplied by ADAPT. Generally, this certification must be completed and returned to the company within 15 days of when it was provided to the employee. ADAPT is not responsible for any charges incurred for completing the certification forms. While off work on leave, verification of continued need for leave and intent to return may also be requested. Failure to provide timely notice or the required certification may result in the leave being delayed or denied, or your absences being counted against our attendance policy or standards.

Employer Notice: Any employee requesting leave will be informed whether he/she is eligible under the FMLA. If an employee is eligible, the notice will specify any additional information required as well as the employee's rights and responsibilities. If an employee is not eligible, a reason will be given for the ineligibility. Employees will also be informed if leave will be designated as FMLA leave and if known, the amount of leave counted against one's total leave entitlement. If ADAPT determines the leave is not covered by the FMLA, the employee will be notified of this determination.

Benefits: Group health plan benefits are continued during FMLA leave. To maintain health care coverage during an approved leave, an employee must continue to pay the regular required employee contribution. If the employee fails to make the required contributions, health care coverage may be terminated, and the employee will be allowed to continue coverage under COBRA. Employees who fail to return from FMLA leave or who terminate within 30 days of returning may be required to reimburse the company for any insurance premiums paid on their behalf during a leave. Non-health benefits will not be continued during FMLA leave. Employees will not lose any benefit that was earned prior to their leave. When it is time for an employee to earn annual personal time and the employee is restored to work, the amount of personal time will be prorated to reflect the amount of time the employee was off work due to the leave. Questions regarding how annual personal time is affected should be directed to the payroll department.

Employees may save up to 60 hours of their personal time while taking FMLA. Employees must inform the Director of Services or Designee of the county in which they work if personal time is to be saved and NOT paid during the leave, and the number of hours being saved.

In certain circumstances, disability benefits or workers' compensation benefits may be available during FMLA leave. You will also be required to use any available personal time during an otherwise unpaid FMLA leave, subject to the terms of the paid time off policy. Employees on FMLA leave will not receive pay for holidays while they are on leave. Additionally, the "block" of personal time an employee receives on their work anniversary will be based on their hours worked and will be adjusted according to reflect the amount of time the employee was on leave.

Other Requirements: Employees may not engage in any work (whether for another employer or self-employed) while on a LOA under this policy. Employees returning from leave due to their own serious health condition may be required to provide the company with a fitness for duty certification. Employees who return from leave within the allowed time limits will be reinstated to their same *or equivalent position* with the company, with equivalent pay, benefits, and other employment terms. The company may deny reinstatement to certain "key employees" consistent with the FMLA guidelines.

Additional information about FMLA can be found on posted notices on employment boards in all ADAPT homes and buildings or from the Director of Services or Designee for the county in which the employee works.

Worker's Compensation

All employees are protected while on the job by Worker's Compensation Insurance. This insurance will provide coverage for an employee who is injured, suffers an occupational illness at work, or has absences in excess of (eight) 8 calendar days due to such an injury or illness. Payments for medical expenses and lost time at work are determined by state law. This insurance also provides death benefits to an employee's dependents (if any) in case of death caused by work. ADAPT pays the full cost of this protection. Failure to promptly report an injury may result in loss of benefits, including the completion of a written employee injury/accident report. When an employee misses work due to a worker's compensation injury, those hours lost shall count towards family medical leave. Employees are responsible for their portion of their health

insurance premiums. Payment must be made to the ADAPT office on payroll Fridays and failure to make payments may result in the loss of ADAPT's health insurance.

Personal time will not be credited during a Worker's Compensation absence unless the employee has personal time available to receive a full paycheck (worker's compensation will adjust their payments to cover this). As stated previously, anniversary hours will be prorated, by ADAPT, when and if the employee returns to work. ADAPT will pay the employer's share of the individual's health insurance premiums for up to 3 months from the date the employee fails to have sufficient personal time to receive a full paycheck.

Employees covered under Worker's Compensation are also covered under FMLA. Employees covered under Worker's compensation may choose to use or not to use their accrued personal time. The employee must specify regarding the use of personal time while meeting with the Director of Services about the LOA. Not all FMLA's are simultaneously Worker's Compensation cases, and **only Worker's Compensation cases are eligible for saving all personal time**.

Maternity Leave

- ◊ Not all Maternity Leaves meet the requirements of the Family Medical Leave Act.
- ◊ If Family Medical Leave is applicable see ADAPT'S Family Medical Leave Policy.
- ◊ If Family Medical Leave is not applicable ADAPT will grant 6 weeks Maternity Leave. During the Maternity leave, ADAPT requires employees to use all but 60 hours of their personal time. Direct Care Workers in the Residential program may save 60 hours of personal time. Employees may choose to use all their personal time. Unless otherwise requested, all of an employee's personal time will be used. Any leave not covered by personal time will be unpaid leave.
- ◊ ADAPT will continue to pay the employer's portion of the health insurance premium during that time. If the employee does not return to work after leave is over (for a minimum of 30 days), the employee will be responsible for reimbursing ADAPT for ADAPT's portion of the health insurance premiums. Employees on leave are responsible for paying their portion of the health insurance premiums when due.
- ◊ If applicable, Maternity Leave and Family Medical Leave will run at the same time.
- ◊ Maternity Leave is applicable to mother and father, and in the case of adoption. The father may take up to six weeks of maternity leave, following the policy as stated above regarding personal time and health insurance. The father's maternity leave must commence within the first 6 months of the child's birth or adoption.
- ◊ Upon returning, employees will be reinstated to a similar position if they have communicated clearly with supervisory and administrative staff about a return date.

Bereavement Leave

Employees who wish to take time off due to the death of an immediate family member should notify their supervisor immediately. **Up to** three (3) days of unpaid leave will be provided for regular full-time employees. Bereavement leave will normally be granted unless there are unusual business needs or staffing requirements.

The employee may choose to use paid personal time rather than bereavement leave and must inform his/her supervisor of such. Employees may, with their supervisors' approval, use personal time for additional time off as necessary. ADAPT defines "immediate family" as the employee's spouse, parent, child, sibling, or grandparent; the employee's mother or father-in-law, child, sibling, or grandparent; and the employee's son or daughter-in-law.

Military Leave

A military leave of absence will be granted to employees who are unavailable to work because of service in the U.S. uniformed services in accordance with the Uniformed Services Employment and Reemployment Rights Act (USERRA). Advance notice of military service is required, unless military necessity prevents such notice, or it is otherwise impossible or unreasonable. If an employee is inducted or enlists in the armed forces of the United States, he/she is to notify his/her supervisor so that arrangements can be made to authorize a leave. Contact the Director of Services for Branch County for more information or questions about military leave.

Holidays

The following holidays will be observed by ADAPT. Holidays are not paid during any type of leave of absence (FMLA, Bereavement, Maternity, Military, etc.). All employees who work on one of the designated holidays (midnight to midnight) will be paid double their normal rate of pay. Time paid under this benefit will not be calculated as hours worked for the purpose of determining overtime unless the employee actually works on the holiday.

Administration, CLS Services, Employment Resources, Outlook, and Residential Supervisors

New Year's Day	Labor Day	PM Preceding Christmas Day
Memorial Day	Thanksgiving Day	Christmas Day
Independence Day	Friday after Thanksgiving	PM Preceding New Year's Day

Any employee in the above category will be paid double time for hours actually worked on any of the designated holidays.

At the Executive Director's discretion, the p.m. preceding Christmas and the p.m. preceding New Years can be eliminated provided that another day with an equal or greater number of hours is designated in its place.

For Administration, CLS Service, and Home Supervisors, if a holiday falls on a weekend a determination will be made by the Executive Director as to when the holiday will be taken off.

Salaried Live-In Residential Supervisors

New Year's Day	Independence Day	PM Preceding Christmas Day
Easter	Labor Day	Christmas Day
Memorial Day	Thanksgiving Day	PM Preceding New Year's Day

If the Holiday falls on their regularly scheduled workday, live-In Salaried Residential Supervisors may EITHER work the Holidays listed above (and receive an additional 24 hours, or 12 hours if the Holiday is a half day, of personal time) or take the day off and receive their normal pay. Residential hourly employees will only receive holiday pay if they work the holiday.

Residential Hourly Employees/In-Home Support Employees

New Year's Day	Independence Day	PM Preceding Christmas Day
Easter	Labor Day	Christmas Day
Memorial Day	Thanksgiving Day	PM Preceding New Year's Day

Personal Time

Personal time is a benefit provided to regular employees and is available to use for illness, appointments, and vacations, with prior approval from supervisors. Temporary employees are not eligible for personal time or other benefits. Employees will be paid personal time at their current hourly rate. Time paid under this benefit will not be calculated as hours worked for the purpose of determining overtime. Personal time shown on paycheck stubs indicate time potentially available through the end of the following pay period.

Employees are responsible for verifying the accuracy of their personal time. If an employee believes there is a mistake with their personal time calculation, he/she has **30 days** from the date of the mistake to request a review and correction, if warranted.

Personal time is not accumulated during any type of leave and/or vacation unless the employee has sufficient personal time to cover those pay periods. Anniversary hours will be prorated unless the employee has sufficient personal time to cover his/her leave and/or vacation. If the anniversary date occurs while an employee is on leave, and the employee has enough personal time to get to the anniversary date, then the employee will receive the full year of annual personal time. If the employee does not have enough personal time, then the annual hours will be prorated and given upon return from the leave/vacation.

******Use of Personal Time (Addition)***

Employees must use their Personal Time when they do not report to a regularly scheduled shift; this is NOT optional. Employees may not choose to be in Lost Time and save their Personal Time for some other reason, such as a planned vacation. Adapt honors requests made upon hire for time off for planned trips, medical appointments, etc., prior to the employee having accumulated Personal Time. Employees who have been working and have had the opportunity to accumulate Personal Time are expected to manage their time and save hours for vacations. Management understands "Life" happens and it is sometimes unavoidable that an employee must miss work and enter Lost Time. When there are good reasons and an employee possesses a good record of managing time and attendance, Adapt supervisors are expected to work with the employee to make up the hours on another shift, if possible.

Sick Time (ESTA)

All part time or variable hour employees or any other employees who do not earn PTO are eligible to earn sick time **effective February 21, 2025**, with the passage of ESTA (Earned Sick Time Act). This policy will replace the previous PMLA (Paid Medical Leave Act). Employees that currently have a bank of sick time under PMLA will not lose that time; however, the method of accrual will change after ESTA is in effect. This new policy will allow ALL employees to earn 1 hour of sick time for every 30 hours worked. The maximum time that can be used is 72 hours annually. Time may be used for personal or family health, domestic violence and sexual assault, child's health or disability, and public health emergencies and after 90 days of employment. **Time is not paid out upon severability (end of employment)**.

Payout of Personal Time (PTO) Upon Separation from Employment

Available personal time shall be paid to any employee who separates from employment with Adapt and meets the following conditions:

1. Provides a full WRITTEN two-week notice to their supervisor. A full two-week notice consists of 14 calendar days. The written notice must be on Adapt's resignation form or in the form of a letter. Text messages, emails, and any other form of notification are not acceptable.
2. The two-week notice must be expressed directly by the employee and not through another person.
3. The employee must work their scheduled shifts during the two-week notice period to receive a payout of their personal time. An employee who must miss a shift during their final two weeks due to illness or personal emergency must give proper notice when calling off AND provide proper documentation (doctor's note, etc.) to support the need to call off from a shift. The employee cannot schedule a vacation during this final two-week period.
4. An employee must work their last scheduled shift in order to receive a payout of their personal time. The only exception that will be made is if the employee can provide the necessary documentation to justify missing their final shift or they give the proper notice and agree to work another shift. This agreement to work another shift must be approved by the employee's supervisor.
5. The employee is NOT being terminated. Any employee who has their employment terminated will NOT receive a payout of remaining personal time.
6. Adapt has a No-Call/No-Show policy where any employee who does not report for three consecutive shifts and does not communicate with the agency regarding these missed shifts, that employee is considered to have voluntarily resigned. The employee is not eligible for payout of their personal time because the proper notice was not given.
7. An employee who is on FMLA/LOA must return to work on their scheduled date. If the employee decides they want to resign, they must provide the required two-week notice. An employee who decides to resign during their FMLA/LOA must give written notice of their intention to resign at least 14 calendar days prior to their expected return date.
8. An employee who has given notice, but who is terminated during their final two weeks of employment will not be paid remaining personal time.

9. Personal Time is not paid when employment ends due to the death of an employee.

RESIDENTIAL EMPLOYEES

When time off is desired, a Request for Time Off form must be submitted to your supervisor prior to the Home Supervisors submitting their schedules to the Human Resources Coordinator every two weeks. Requests for time off submitted after the schedule has been turned in may be accommodated, if possible, with the Home Supervisor's approval.

RESIDENTIAL EMPLOYEES INCLUDING SUPERVISORS (the following does not include Live-in Salaried Residential)

All Residential employees who are full-time (70 hours or more per pay period) will accrue personal time as follows:

Years of employment	Hrs. Earned Per Pay Period	Hrs. On Anniversary	Total Yearly Hours
0-1	3	50	128
2-4	2.75	72	143.5
5-9	2.75	104	175.5
10- 29	2.75	124	195.5
30+	2.75	163	234.5

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For Regular Part-Time Residential Employees, the following schedule will apply:

- ◊ 60-69.9 Hours per Pay Period: 80% of full-time schedule
- ◊ Below 60 hours per pay period: 0 Benefits

Residential employees may not accumulate personal hours in excess of 220 hours (250 hours for employees with 30+ years). Residential employees have the option of selling excess hours based on the following:

- ◊ Employees must have a minimum of 100 hours of personal time before requesting a pay-off.
- ◊ Employees may request a pay-off of no more than 50% of time available.
- ◊ Pay-off will be at the regular hourly pay rate.

Residential employees who accumulate in excess of 220 hours will be given two (2) pay periods to reduce those hours to 220 or below (except employees over 30 years, who may accumulate 250 hours). If the hours are not reduced to 220 or below, then the hours in excess of 220 will be added to the employee's paycheck. The only exception to this will be if an employee receives his/her anniversary hours and those hours put an employee in excess of 220. In that case, employees will be given four (4) pay periods to reduce their hours to 220 or below before excess hours are automatically paid. The Executive Director may allow an exception for the employee to carry extra hours if there is a situation pending where the employee will be needing the hours in the near future.

LIVE-IN RESIDENTIAL SALARIED MANAGERS

	Hrs. Earned Per Pay Period	Total Yearly Hours
PER ANNIVERSARY YEAR	9.23	240

Live-In Residential Salaried supervisors who accumulate in excess of 240 hours will be paid $120 for every 24 hours they wish to sell (must sell in 24-hour increments). If a Live-In-Residential Salaried supervisor accumulates more than 360 hours, they will automatically be paid $120 per 24 hours to remain under 360 hours and must retain at least 50% of time available.

NON-RESIDENTIAL EMPLOYEES

All Non-residential employees who are full-time (70 hours or more per pay period) accrue personal time as follows:

DAY SERVICES EMPLOYEES AND SUPERVISORS (Clubhouse, Employment Resources, CLS Day Program)

Years of Employment	Hours Earned per Pay Period	Hours on Anniversary	Total Yearly Hours
0-1	3	50	128
2-4	2.75	84	155.75
5-9	2.75	119	190.75
10-29	2.75	136.5	208
30+	2.75	176	247.5

ADMINISTRATION (full-time – 80 hours per pay period)

*For Employees hired PRIOR to January 1, 2020

Years of Employment	Hrs. Earned Per Pay Period	Hrs. On Anniversary	Total Yearly Hours
0-1	3	63	141
2-4	2.75	101	172.5
5-9	2.75	139.5	211
10-29	2.75	156.5	228
30+	2.75	196.5	268

ADMINISTRATION (full-time – 80 hours per pay period)

*For Employees hired AFTER January 1, 2020

Years of Employment	Hrs. Earned Per Pay Period	Hrs. On Anniversary	Total Yearly Hours
0-1	3	56	134
2-4	2.75	90	161.5
5-9	2.75	128.5	200
10-29	2.75	143.5	215
30+	2.75	180.5	252

For Regular Part-Time Non-Residential Employees, the following schedule will apply:

- ◊ 60-69.9 Hours Per Pay Period: 80% of full-time schedule
- ◊ Below 60 hours per pay period: 0 Benefits

Non-residential employees may not accumulate personal hours in excess of 280 hours (except employees over 30 years, who may accumulate 320 hours). If the hours are not reduced to 280 (or 320 when applicable) or below within two (2) pay periods, then the hours in excess of 280 (or 320) will be added to the employee's paycheck. The only exceptions are, 1) if anniversary hours cause an employee to be in excess of 280 (or 320) hours, then the employee will have four (4) pay periods before those additional hours are paid to the employee on the following paycheck and 2) the Executive Director allows an employee to carry the hours for a planned vacation or leave of absence.

Non-Residential employees have the option of selling excess hours based on the following:

- ❖ The employee must have a minimum of 100 hours of personal time before requesting a pay-off.
- ❖ The employee may request a pay-off of no more than 50% of time available.
- ❖ Pay-off will be at the employee's regular pay rate for hourly and salaried employees.
- ❖ Administrative employees who want to sell personal time must contact the Executive Director who has the sole discretion to approve or deny the request.

Transportation and Other Expenses

Reimbursement for the use of a personal car on the job other than to and from work will be paid upon the approval of the supervisor. The Board of Directors shall determine the rate of reimbursement. Should an unusual circumstance or emergency occur, necessitating transportation by taxi, bus, or other mode of travel, the cost of such will be reimbursed upon submitting a receipt, and/or explanation of the same. All such requests must have the approval of the Executive Director.

The following items are chargeable to expense accounts with the approval of the Executive Director:

- ◊ Meals while out of the county, hotel expenses, telephone calls, and other approved incidentals.
- ◊ Breakfast, lunch, or dinner meetings required by the agency or in the interest of the organization.
- ◊ All expenses incurred shall not exceed state standards unless an emergency exists. Should an employee have any questions concerning work-related reimbursement, he/she will seek clarification and/or approval from the Executive Director.

Bonus Policy

It is the policy of ADAPT that bonuses may be provided periodically to specified employees based on the availability of funds and at the sole discretion of the Executive Director/Board of Directors. Bonuses are not guaranteed and ADAPT management retains discretion both as to the fact of a bonus payment, and as to the amount, until a date close to the end of the period for which the bonus is written.

If the decision is made to distribute bonuses, said bonus will be available only to employees who are actively employed with ADAPT in a regular position on the date bonuses are distributed. ADAPT does not promise to pay a bonus at any time or in any amount, either expressed or implied, other than eligibility for bonuses under the *Recruitment Program for Residential Employees*, which may be discontinued at any time, without notice, and at the discretion of Adapt management.

Recruitment Program for Residential Employees

Referral Bonus

Employees who refer a person who is hired into the Residential Program at ADAPT become eligible to receive a Referral Bonus. The following criteria must be met to receive the bonus:

- ◊ The person referred to ADAPT for employment in the Residential Program must put the referring employee's name on his/her job application as the referral source. Only one name can be written as the referral source.
- ◊ If the referred employee is still employed at ADAPT 90 days from the date of hire, has completed all required training, and is working at least 50 hours per pay period in the Residential Program, the referring employee (referral source) will be paid $250.
- ◊ If the referred employee is still employed at ADAPT 12 months from the date of hire, is working at least 60 hours per pay period in the Residential Program, and has completed all required training, the referring employee (referral source) will be paid an additional $350.
- ◊ All bonuses are subject to applicable taxes.
- ◊ The referring employee is responsible for tracking when the referred employee has been employed for 90 days and 12 months and should notify office personnel.
- ◊ The referring employee must be actively employed by ADAPT at the time the bonus is earned and requested. Employees who are on leave of any kind will receive their bonus upon returning to work.

Retention Bonus

Employees who are hired into the Residential Program or work as Substitute Residential Aide become eligible to receive a Retention Bonus. The following criteria must be met to receive the bonus:

- ◊ The new employee must be a "first-time" hire, meaning he/she has never been employed by ADAPT or a "rehire" who left ADAPT previously in "good standing."
- ◊ "Good-standing" generally means the employee was not involuntarily terminated from ADAPT, gave proper notice, and worked scheduled shifts after giving notice. Further, any determination regarding

a former employee having left in “good standing” is solely at the discretion of ADAPT hiring personnel and is final.

- ◊ Employees who reach 90 days of employment (from date of hire), who have completed all required training, work in the Residential program either as a full-time employee or as a Substitute Residential Aide and average a minimum of 50 hours per pay period, are eligible to receive a $250 Retention Bonus.
- ◊ Employees who continue to be employed at 12 months are eligible for an additional $750 Retention Bonus if working in the Residential Program or as a Substitute Residential Aide, have continued to meet all training requirements, and who have averaged a minimum of 60 hours per pay period over the previous three (3) months.
- ◊ All bonuses are subject to all applicable taxes.
- ◊ It is the responsibility of the employee to notify office personnel when he/she has been employed for 90 days and again at 12 months.
- ◊ The employee must be actively employed by ADAPT at the time the bonus is earned and requested. Employees who are on leave of any kind will receive their bonus upon returning to work.

Temporary Premium Pay for Direct Care Workers

A temporary premium pay increase for Direct Care Workers started during the Covid-19 Pandemic. MDHHS approved an extension to fund the initial premium pay of $2.35/per hour, and an additional $.85/hour was approved and effective October 1, 2023, for a total of $3.20/hour in addition to ADAPT’s normal hourly wages. Effective October 1, 2024, an additional $.20/hour has been approved for a current premium pay rate of $3.40/hour. The premium pay has not been approved as a permanent wage increase but has been extended.

Annuity

ADAPT provides for a tax-sheltered annuity contribution of 5% of salary for all salaried staff. Other regular employees may join the annuity program, if eligible, but no contribution will be made by ADAPT. Information is available at the ADAPT office.

Section 125 Plan

ADAPT provides a Section 125 plan that allows employees to pay for their health insurance premiums, out-of-pocket health and dental expenses, and day care expenses with pre-taxed dollars. Information is available at the ADAPT office.

Insurance

ADAPT provides professional liability insurance for employees.

Health insurance coverage will be available to all eligible employees. Employees must be enrolled within 30 days from the date of hire into a regular position consisting of 60 hours or more per pay period. Employees are to contact the office as soon as they accept a position consisting of 60 hours or more per pay period. All employees electing to have health insurance coverage within 30 days of when they become eligible will be accepted into the health care program. Coverage will begin on the first day of the month following 60 calendar days from when the employee became eligible. An employee who waits until after 30 days of becoming eligible must wait until the annual open enrollment period to enroll. This provision applies not only to the employee but also to their dependents.

The specifics of the health plan will be distributed to employees when they receive their ID cards and are available at any time in the office. The plan documents will spell out more specifically what the benefits of the health program are and the employer/employee rights under the plan. It is the intent of ADAPT to offer the health plan to all eligible employees based on the board adopted co-payment schedule. ADAPT will fully comply with the law but the employee will be responsible for 100% of any cost beyond coverage for employee, spouse, and/or children under the age of 26 (through the end of the calendar year they turn 26) as per the schedule listed below. ADAPT reserves the right to cancel or amend its health insurance benefit at its sole discretion.

CO-PAYMENT SCHEDULE FOR HEALTH INSURANCE

Hourly (70-80 hrs.) and Live-In Salaried Residential Managers	Residential Shift Leaders	Salaried Employees
ADAPT will pay: 80% of an individual plan	ADAPT will pay: 80% of an individual plan 70% of family or couple plan (hourly supervisors) or 60% of family or couple plan (shift leaders)	ADAPT will pay: 80% of an individual plan, or family, or couple plan

*All employees, regardless of hire date, will adhere to the above schedule when adding initial coverage or when changing plans.

The annual open enrollment period is generally a two-week period typically in May or June.

For less than full-time staff, the following schedule shall apply:

- ◊ 60 - 69.9 scheduled hours per pay period = 80% of full-time schedule
- ◊ Less than 60 scheduled hours per pay period = 0 benefits

Insurance benefits end on the last day of employment when an employee resigns or is terminated. Employees interested in continuation of insurance should refer to the COBRA policy below. Questions regarding insurance should be addressed at the main office in Coldwater.

COBRA (Optional)

If your employment with ADAPT ends through layoff, resignation, or discharge for reasons other than gross misconduct, and if at the time of employment separation from ADAPT you are receiving health insurance, or if your hours are reduced to the point where you no longer receive ADAPT'S paid medical benefits, your health insurance coverage may continue for up to 18 months at your own expense. This continuation of insurance must be applied for within 60 days of the time your employment separation from ADAPT or notification of eligibility for continued coverage, whichever is later.

- If one of the following events occurs to you (the former employee), your spouse, and/or other dependent, health insurance may be continued for up to 36 months, at your (or their) own expense. Persons who desire these benefits should contact the Payroll/Benefit department at the main office in Coldwater as soon as any of these events occur:
- ♦ Death
- ♦ Divorce or Legal Separation
- ♦ Having a child, who is covered by your health insurance, who exceeds the maximum age for coverage as your dependent. A child "ages" out at the end of the calendar year in which they reach the age of 26 years. *Example: Your child turns 26 years old on July 1st of 2025. Your child is covered through December 31, 2025. They are no longer covered on January 1, 2026.*

Extended coverage will end automatically if any of the situations listed below occurs:

- ♦ ADAPT stops providing group health benefits.
- ♦ Required health care premiums are not paid by the participant to ADAPT within 30 days of the due date (1st day of each month).
- ♦ A person eligible for extended benefits becomes covered under another employer's group health plan.
- ♦ A former spouse eligible for continued coverage remarries and becomes covered under the new spouse's group health plan.

The Cost for the Continuation of Benefits:

The cost for you or your dependents will be 102% of ADAPT'S current monthly cost for your (or their) coverage as outlined in the guidelines of the COBRA law and must be paid within 30 days of the due date (the 1st day of each month).

Titles and Headings

Titles and Headings of sections or paragraphs are inserted for convenience of reference only and are not intended to affect the interpretation or construction of this document.

Revised: 4/17; 2/19; 2/2020; 4/2023; 7/2023; 10/2023; 12/2024; 5/2026

Receipt of Personnel Policies Handbook

I have received a copy of the Personnel Policies Handbook (effective 5-1-2026). I understand that I have no reasonable expectation to believe these policies and procedures will remain in effect indefinitely. I understand that this handbook does not constitute an expressed or implied contract. I further understand that these personnel policies do not constitute a contractual arrangement between ADAPT, Inc., and myself. I understand that the company reserves a unilateral right to change, withdraw, or add to these policies at any time.

Signing this form is your personal attestation that you have read and understand Adapt's personnel policies. You are responsible for complying with these policies. Ask questions if you do not understand something.

This page is to be signed and dated and returned to Human Resources. This signature page is kept in your employee personnel file.

Printed Name: _____

Signature: _____ Date: _____