



CORNERSTONE
Community Action Agency

Personnel Policies Manual

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Section: Foreword
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Policy No.:
Effective:02/21/2012
Revised:06/06/2012

EMPLOYEE HANDBOOK STATEMENT

This manual reflects the policies and procedures of Central Texas Opportunities, Inc. (CTO), dba Cornerstone Community Action Agency (CCAA). The purposes of this manual are:

- ❖ To provide management with the information necessary to fulfill its responsibilities to its employees; and
- ❖ To provide for fairness and equality in the treatment of its employees.

All employees of CCAA should read, understand, and comply with all provisions of the employee handbook personnel policies. It describes many of your responsibilities as an employee and outlines the programs developed by CCAA to benefit employees.

Questions about application, interpretation, or clarification regarding any specific policies or procedures are to be directed to the Executive Assistant.

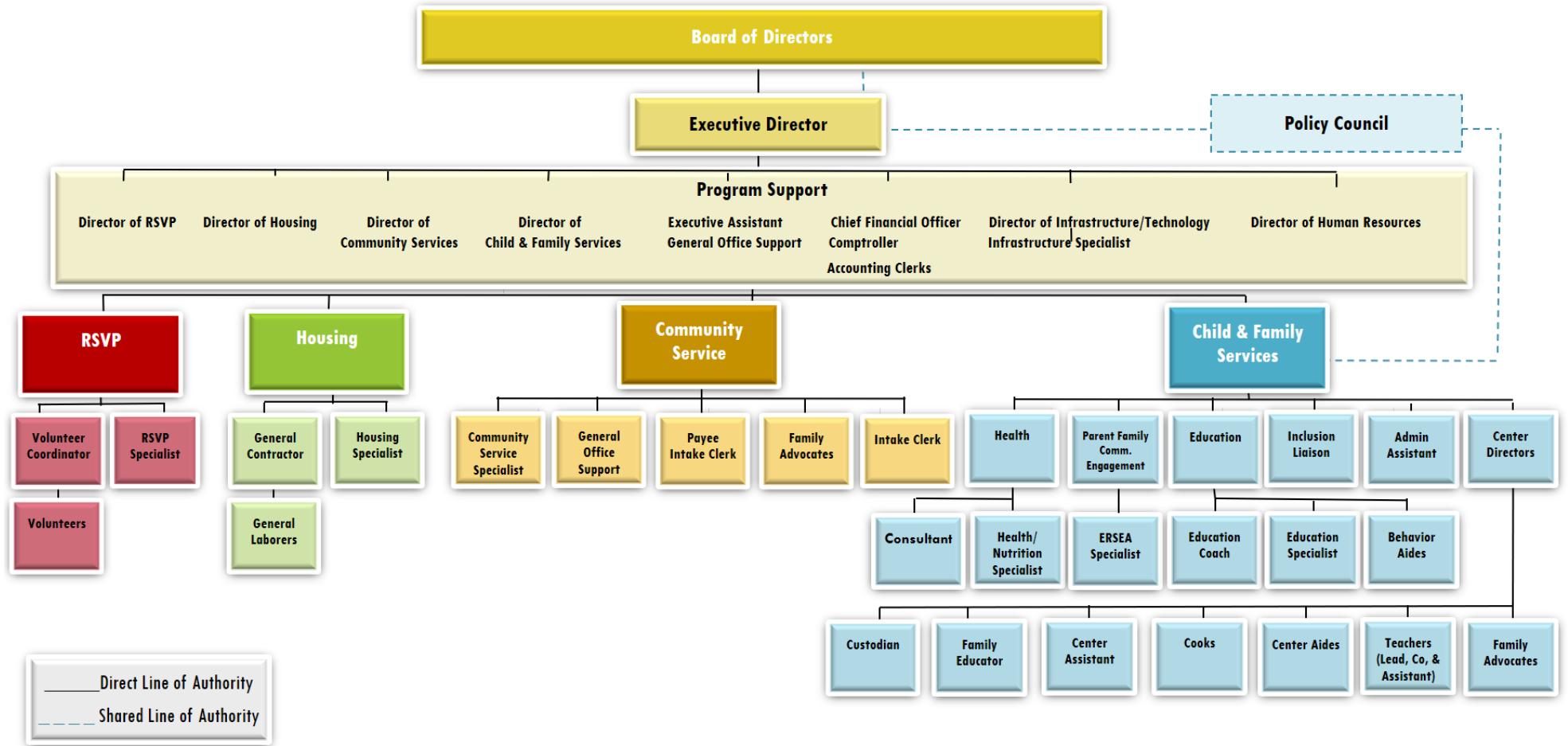
No employee handbook can anticipate every circumstance or question about policy. As CCAA continues to grow, the need may arise, and CCAA reserves the right, to revise, supplement, or rescind any policies or portion of the handbook from time to time as it deems appropriate, in its sole and absolute discretion. The only exception to any changes is our employment-at-will policy permitting you or CCAA to end our relationship for any reason at any time. Employees will be notified of such changes to the handbook as they occur.

Because such policies and procedures are subject to change with or without prior notice, the information provided in these Personnel Policies are not intended to create a contract of employment nor should it be construed as the terms and conditions of a contract of employment with the organization.

This handbook replaces and supersedes all earlier CCAA personnel practices, policies and guidelines.

To the extent that any policy may conflict with federal, state, or local laws, the organization will abide by the applicable federal, state, or local law.

Organizational Chart





Helping People. Changing Lives.

*Cornerstone Community Action Agency
114 Needham
Coleman, Texas 76834*

Phone (325)625-4167 Fax (325)625-3335

Our Vision, Mission, and Values

Our Vision Statement

To build thriving and self-sufficient communities by creating equal opportunities for all individuals and families.

Our Mission Statement

A Community in Action, Empowering People, Changing Lives, and Offering Hope to Achieve Self-Sufficiency.

Our Values (Guiding Principles)

1. **Integrity.** We conduct all business lawfully and with integrity.
2. **Compliance.** We strive for 100% of compliance.
3. **Honesty.** We expect honesty among staff, governing boards, families, and the communities we serve.
4. **Respect.** We treat others with dignity, respect, honesty, and sensitivity. We appreciate the value of diversity. Encourage and practice teamwork.
5. **Pride.** We strive to instill pride in the character of each individual.
6. **Change.** We embrace change. Envision what could be, challenge the status quo, and capitalize on growth opportunities.
7. **People Focus.** Understand and develop relationships with people to fully understand and satisfy their needs.
8. **Knowledge and Education.** We believe knowledge and education is the foundation for a brighter individual.
9. **Transparency and Accountability.** We practice transparency and accountability throughout all organizational practices.
10. **Fulfillment.** Produce results that create value to realize your full potential and find fulfillment in your work.

Serving: Brown, Callahan, Coleman, Comanche, Eastland, McCulloch, Runnels, Jack, Palo Pinto, Parker, and Wise Counties



COMMUNITY ACTION CODE OF ETHICS

Code of Ethics

We, as community action professionals, dedicate ourselves to eliminating poverty in the midst of plenty in this nation by opening to everyone the opportunity for education and training; the opportunity for work; and the opportunity to live in decency and dignity; and with respect for cultural diversity, commit ourselves to:

- ❖ Recognize that the chief function of the community action movement at all times is to serve the best interests of the poor, thereby serving the best interests of all people.
- ❖ Accept as a personal duty the responsibility to keep up to date on emerging issues and to conduct ourselves with professional competence, fairness, impartiality, efficiency, and effectiveness.
- ❖ Respect the structure and responsibilities of the Board of Directors, provide them with facts and advice as a basis for their making policy decisions, and uphold and implement policies adopted by the Board of Directors.
- ❖ Keep the community informed about issues affecting the poor; facilitate communication by the poor with locally elected public officials and the private sector.
- ❖ Conduct our organizational and operational duties with positive leadership exemplified by open communication, creativity, dedication, and compassion.
- ❖ Exercise whatever discretionary authority we have under the law to promote the interests of the poor.
- ❖ Lead the community action movement with respect, concern, courtesy, and responsiveness, recognizing that service to the poor is beyond service to oneself.
- ❖ Demonstrate the highest standards of personal integrity, truthfulness, honesty, and fortitude in all our community action activities in order to inspire confidence and trust in the community action movement.
- ❖ Serve in such a way that we do not realize undue personal gain from the performance of our professional duties.
- ❖ Avoid any interest or activity that is in conflict with the conduct of official duties.
- ❖ Respect and protect privileged information to which we have access in the course of official duties.
- ❖ Strive for professional excellence and encourage the professional development of our associates, including those seeking to become certified community action professionals.

What Is A Community Action Agency?

Community Action Agencies are private non-profit or public organizations that were created by the federal government in 1964 to combat poverty in geographically designated areas. Status as a Community Action Agency is the result of an explicit designation by local or state government. A Community Action Agency has a tripartite board structure that is designated to promote the participation of the entire community in the reduction or elimination of poverty. Community Action Agencies seek to involve the community, including elected public officials, private sector representatives, and especially low-income residents in assessing local needs and attacking the causes and conditions of poverty.

Purpose and Mission

In order to reduce poverty in its community, a Community Action Agency works to better focus available local, state, private, and federal resources to assist low-income individuals and families to acquire useful skills and knowledge, gain access to new opportunities and achieve economic self-sufficiency.

Structure

A Community Action Agency:

- Has received designation as a Community Action Agency either from the local government under the provisions of the Economic Opportunity Act of 1964, or from the state under the Community Services Block Grant Act of 1981, as amended;
- Is recognized as an eligible entity as defined in the CSBG Act and can receive funding from the state under the Community Services Block Grant;
- Has a governing board consisting of at least one-third democratically selected representatives of low-income people, one-third local public officials or their designees, and the remainder representatives of business, industry, labor, religious, social welfare, and other private groups in the community; and
- Belongs to a national network of similar agencies, the majority of which received their initial designation, federal recognition and funding under the amended Economic Opportunity Act of 1964.

Mode of Operation

A Community Action Agency carries out its mission through a variety of means including: (a) community-wide assessments of needs and strengths, (b) comprehensive anti-poverty plans and financial resources, (c) advocacy on behalf of low-income people and (d) partnerships with other community-based organizations to eliminate poverty. A Community Action Agency involves the low-income population it serves in the planning, administering and evaluating of its programs.

Why Community Action Agencies Are Unique

Most poverty-related organizations focus on a specific area of need, such as job training, health care, housing, or economic development. Community Action Agencies reach out to low-income people in their communities, address their multiple needs through a comprehensive approach, develop partnerships with other community organizations, involve low-income clients in the agency's operations, and administer a full range of coordinated programs designed to have a measureable impact on poverty.

THE PROMISE OF COMMUNITY ACTION

**Community Action changes people’s lives, embodies the spirit of hope,
improves communities, and makes America a better place to live.**

**We care about the entire community, and we are dedicated to helping people
help themselves and each other.**



Section: General Information
Policy: Social Media
Policy No.: 201
Effective: 01/24/2012
Revised: 10/27/2015

201 - USE OF SOCIAL MEDIA

This policy applies to all employees, Board of Directors, and volunteers who work for or with CCAA.

Social media includes all means of communicating or posting information or content of any sort on the Internet, including to your own or someone else's web log or blog, journal or diary, personal web site, social networking or affinity web site, web bulletin board or a chat room, whether or not associated or affiliated with CCAA, as well as any other form of electronic communication.

Employees will not create any type of social media page or site that is related to CCAA or any of its programs, without prior approval from the Executive Director or Program Director. **All mainstream media inquiries must be referred to the Executive Director.**

Keep in mind that any of your conduct that adversely affects your job performance, the performance of fellow associates or otherwise adversely affects members, customers, clients, suppliers, people who work on behalf of CCAA or CCAA's legitimate business interests may result in disciplinary action up to and including suspension/termination.

Carefully read the personnel policies and ensure your postings are consistent with these policies. Inappropriate postings that may include discriminatory remarks, harassment, and threats of violence or similar inappropriate or unlawful conduct will not be tolerated and may subject you to disciplinary action up to and including suspension/termination.

Always be fair and courteous to fellow associates, customers, members, suppliers or people who work on behalf of CCAA. Also, keep in mind that you are more likely to resolve work-related complaints by speaking directly with your co-workers or by utilizing our open door policy than by posting complaints to a social media outlet.

Nevertheless, if you decide to post complaints or criticism, avoid using statements, photographs, video or audio that reasonable could be viewed as malicious, obscene, threatening or intimidating, that disparage customers, members, associates or suppliers, or that might constitute harassment or bullying.

Examples of such conduct might include offensive posts meant to intentionally harm someone's reputation or posts that could contribute to a hostile work environment on the basis of race, sex, disability, religion or any other status protected by law or CCAA policy.

Make sure you are always honest and accurate when posting information or news, and if you make a mistake, correct it quickly. Be open about any previous posts you have altered. Remember that the Internet archives almost everything; therefore, even deleted postings can be searched. Never post any information or rumors that you know to be false about CCAA fellow associates, members, customers, suppliers, or people working on behalf of CCAA or competitors.

There are some types of information employees are not permitted to discuss or display online, including:

- Information that is confidential or proprietary to CCAA or to a third party that has disclosed information to the company. For example: information about or identifying co-workers; the company's customers, partners, vendors, and suppliers; or
- Information that may be valuable to a competitor including specific product information or pricing; release dates, and pending reorganizations; and CCAA intellectual property such as drawings and/or designs, software, ideas, and innovation.
- Statements disparaging CTO, Inc.'s or our competitor's products or services, executive leadership, coworkers, strategy, and business prospects.
- CCAA's logo on any social media network without permission. Also, images of co-workers and CCAA premises and property.
- Statements, comments, or images referencing illegal drugs or that include profanity or could be considered obscene.
- Statements, comments, or images that disparage any race, religion, gender, sexual orientation, disability, or national origin. Also, any communication that engages in personal or sexual harassment, unfounded accusations, or remarks that would contribute to a hostile work environment (racial, sexual, religious, etc.). As well as, any behavior not in agreement with CCAA's Standards of Ethical Conduct Policy, personnel policies, or the Vision, Mission and Values Statement.

Nothing in this section shall be interpreted or applied as limiting an employee's right to engage in protected concerted activity as provided by the National Labor Relations Act.

Refrain from using social media while on work time or on CCAA equipment, unless it is work-related as authorized by your manager or consistent with the equipment policy. Do not use CCAA email addresses to register on social networks, blogs or other online tools utilized for personal use.

CCAA prohibits taking negative action against any employee for reporting a possible deviation from this policy or for cooperating in an investigation. Any employee who retaliates against another employee for reporting a possible deviation from this policy or for cooperating in an investigation will be subject to disciplinary action, up to and including suspension/termination.

Federal law requires that any employee who endorses the Company online must disclose his or her employment in the endorsement. CCAA appreciates that employees may be tempted to correct misinformation about the company that might randomly appear online. If such a situation occurs, the employee should relay the information to the Executive Director, who will determine the best response, if any.

Section: General Information
Policy: Employee Relations
Policy No.: 202
Effective: 02/01/1995
Revised: 10/27/2015

202 - EMPLOYEE RELATIONS/COMMUNICATION

Employees should share their concerns, seek information, provide input, and resolve work-related issues by discussing them with the Program Director until they are fully resolved. It may not be possible to achieve the result an employee wants, but the Program Director needs to attempt to explain in each case why a certain course of action is preferred. If an issue cannot be resolved at this level, the employee is welcome to discuss the issue with the Executive Director. The Program Director should set up a time for both of them to meet with the Executive Director. If the employee's concern cannot be resolved with the Executive Director, the employee may follow the Problem Resolution Policy.

Regardless of the situation, the employee should be able to openly discuss any work-related problems and concerns without fear of retaliation. The Program Director is expected to listen to employee concerns, to encourage their input, and to seek resolution to the issues and concerns. Often this will require setting a meeting in the near future. The Program Director is to set these meetings as quickly as possible and employees are expected to understand that issues and concerns may not always be addressed at the moment they arise. Discussing these issues and concerns with management will help to find a mutually acceptable solution for nearly every situation.

If an employee has a concern about discrimination and/or harassment, CCAA has set up special procedures to report and address these issues. Those reporting procedures are set forth in CCAA's Harassment and/or Discrimination Policy.

Section: General Information
Policy: Use of Telephones and Personal Electronic Devices
Policy No.: 203
Effective: 08/26/2003
Revised: 10/27/2015

203 - USE OF TELEPHONES AND PERSONAL ELECTRONIC DEVICES

Office telephones are a vital part of our business operation. Because of the large volume of business transacted by telephone, personal use of the telephone should be limited and personal calls should be brief. Personal use of the telephone for long- distance and toll calls is not permitted. To ensure effective telephone communications, employees should always use the approved greeting and speak in a courteous and professional manner.

Employees may have access to a cell phone while in their cars and should remember that their primary responsibility is driving safely and obeying the rules of the road. Employees are prohibited from using cell phones, unless it can be done “hands free”, while driving and should safely pull off the road and come to a complete stop before dialing or talking on the phone.

During work time, employees should limit the use of their personal cell phones. Employees should set personal cell phones on the silent ring mode during work hours to avoid disturbing those working around them. Constant texting during business hours is not permitted, unless it is company business. No cell phones are allowed on while in meetings with other staff, clients, trainings, etc. Any violation of this will lead to staff member being directed not to bring a cell phone in the building.

Employees should never use any type of photographic feature on their cell phones to take pictures of clients, or company documents without receiving written permission from management to do so.

Section: General Information
Policy: Business Ethics & Conduct
Policy No.: 204
Effective: 02/01/1995
Revised: 06/21/2022

204 – BUSINESS ETHICS & CONDUCT

The continued success of CCAA is dependent upon our clients' and families' trust and we are dedicated to preserving that trust. Employees owe a duty to CCAA, its clients families, and Board of Directors to act and speak in a way that will merit the

continued trust and confidence of the public.

CCAA will comply with all applicable laws and regulations and expects its directors, consultants, volunteers, 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.

Employees are encouraged to express any concerns or report any violations of any laws or regulations without fear of retaliation. CCAA will not discriminate against any employee or other person who reports a violation of the terms of any grant contract or on any law or regulation to the funding source or to any appropriate law enforcement authority, if the report is made in good faith.

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 by following the proper chain of command.

Compliance with this policy of business ethics and conduct is the responsibility of every CCAA employee. Disregarding or failing to comply with this standard of business ethics and conduct could lead to disciplinary action, up to and including possible termination of employment.

All contractors, consultants, companies, or individuals under contract with CCAA will be considered employees for the purpose of this policy and must follow this policy while performing services for or relating to CCAA Failure to follow this policy is grounds for cancelling any/all contracts with the offender.

Section: General Information
Policy: Conflicts of Interest
Policy No.: 205
Effective: 02/01/1995
Revised: 10/27/2015

205 - CONFLICTS OF INTEREST

Cornerstone Community Action Agency needs to know that the transactions employees participate in are ethical and within the law, both in letter and in spirit. CCAA expects employees to conduct business in accordance with relevant policies, procedures, and laws and to refrain from any illegal, dishonest, or unethical conduct. Disregarding or failing to comply with this standard of business ethics and conduct could lead to disciplinary action, up to and including possible termination of employment.

Employees are encouraged to seek assistance from the Program Director with any legal or ethical concerns. Examples of conflicts of interest are listed below (but are not limited to these items):

- An outside business interest that competes with the activities of CCAA;
- An outside business that is a purchaser or supplier of goods or services to CCAA;
- An outside business involvement or employment that interferes with the ability to devote necessary attention to the responsibilities at CCAA (moonlighting);
- A relative or person with a significant relationship employed by, or has a business interest in companies that compete with, sell to, or buy from CCAA;
- Purchase inducements (gifts, premiums, money, goods, or services) from vendors that benefit the employee personally (directly or indirectly) or are unauthorized or questionable in nature.

Conflicts of interest may take many forms including but not limited to the acceptance of gifts from competitors, vendors, potential vendors, or customers [clients] of the organization. Gifts may only be accepted if they have a nominal retail value and only on appropriate occasions (for example, a holiday gift). Employees are cautioned not to accept any form of remuneration or nonbusiness-related entertainment, nor may employees sell to third parties any information, products, or materials acquired from the organization. Employees may engage in outside business activities provided such activities do not adversely affect the organization or the employee's job performance and the employee does not work for a competitor, vendor, or customer [client]. Employees are prohibited from engaging in financial participation, outside employment, or any other business undertaking that is competitive with or prejudicial to the best interests of CCAA. Employees may not use proprietary and/or confidential information for personal gain or to the organization's detriment nor may they use assets or labor for personal use.

If an employee or someone with whom the employee has a close personal relationship has a financial or employment relationship with a competitor, vendor, potential vendor, or customer [client] of the organization, the employee must disclose this fact in writing. The organization will determine what course of action must be taken to resolve any conflict it believes may exist. If the conflict is severe enough, CCAA may be forced to ask the employee to tender his/her resignation. CCAA has sole discretion to determine whether such a conflict of interest exists.

Members of the Board of Directors, Governing Body, or Administering Board of any public, private, or nonprofit organization funded by CCAA or members of any major policy advisory bodies, are not eligible for employment with the organization. Former members of these

Boards and advisory bodies are eligible for employment following their resignation.

The recipient shall maintain written standards of conduct governing the performance of its employees engaged in the award and administration of contracts. No employee, officer, or agent shall participate in the selection, award, or administration of a contract supported by federal funds if a real or apparent conflict of interest would be involved. Such a conflict would arise when the employee, officer, or agent, or any member of his or her immediate family, his or her partner, or an organization which employs or is about to employ any of the parties indicated herein, has a financial or other interest in the firm selected for an award. The officers, employees, and agents of the recipient shall neither solicit nor accept gratuities, favors, or anything of monetary value from contractors, or parties to sub-agreements. However, recipients may set standards for situations in which the financial interest is not substantial or the gift is an unsolicited item of nominal value. The standards of conduct shall provide for disciplinary actions to be applied for violations of such standards by officers, employers, or agents of the recipients.

Section: General Information
Policy: Use of Equipment & Vehicles
Policy No.: 206
Effective: 11/28/2006
Revised: 06/21/2022

206 - USE OF COMPANY/PERSONAL VEHICLES & EQUIPMENT

When using property, employees are expected to exercise care and follow all operating instructions, safety standards and guidelines. Personal use of agency equipment and vehicles is not permitted. Only company vehicles may be used to transport clients and volunteers at any time.

Please notify the immediate supervisor if any equipment, machines, tools, or vehicles appear to be damaged, defective, or in need of repair. Prompt reporting of damages, defects, and the need for repairs could prevent deterioration of equipment and possible injury to employees or others.

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 disciplinary action, up to and including termination of employment.

Company owned vehicles are the property of CCAA and will be utilized for business purposes regardless of which center the vehicle is assigned to. Staff should understand company vehicles should be treated with care and not as their own personal property. Staff who fail to ensure proper care will receive disciplinary action, up to and including termination of employment.

Payment of speeding and/or parking tickets is the sole responsibility of the employee driving the vehicle. Failure to pay such tickets prior to notification to CCAA by law enforcement agencies may result in corrective action up to and including termination for the employee driver.

Section: General Information
Policy: Outside Employment
Policy No.: 207
Effective: 02/01/1995
Revised: 10/27/2015

207 - OUTSIDE EMPLOYMENT

Cornerstone Community Action Agency's policy regarding outside employment is to ensure it does not interfere with performance or ability to meet the job requirements at the agency. An employee may hold outside employment as long as they meet the performance standards of their job.

If CCAA determines that an employee's outside work interferes with performance or the ability to meet the requirements of their position, or has an adverse impact on CCAA, the employee may be required to terminate the outside employment if he or she wishes to remain with CCAA

Outside employment that constitutes a conflict of interest is prohibited. An employee will not be allowed to work for another employer while on a leave of absence or while absent from the agency because of illness.

Section: General Information
Policy: Confidential Information
Policy No.: 208
Effective: 02/01/1995
Revised: 10/27/2015

208 - CONFIDENTIAL INFORMATION

Cornerstone Community Action Agency has information that should not be discussed with anyone outside the organization, except when required in the normal course of business. Information concerning the activities or operations of the organization, or concerning service recipients, must be treated as confidential or on a need-to-know basis.

Company property includes not only tangible property, but also intangible property such as confidential information. Such confidential information includes, but is not limited to, the following examples:

- Personnel information
- Client records
- Compensation data
- Computer processes, programs and codes
- Financial information
- Pending projects and proposals

If an employee leaves, the employee must surrender all information-bearing items in his or her possession, whether or not containing confidential information, including but not limited to, all storage media, notebooks, reports, keys, ID badges and any other confidential information or company property.

All employees of CCAA, Board of Directors, volunteers and consultants will be required to sign a confidentiality form as a condition of employment. Employees who improperly use or disclose confidential business information will be subject to disciplinary action, up to and including termination of employment and legal action, even if they do not actually benefit from the disclosed information.

Section: General Information
Policy: Disability Accommodation
Policy No.: 209
Effective: 02/01/1995
Revised: 10/27/2015

209 – DISABILITY ACCOMMODATION

Cornerstone Community Action Agency will not discriminate in employment opportunities or practices, including recruitment, hiring, promotion, training, layoff, termination, compensation, benefits, or other employment-related activities. CCAA ensures equal opportunity for qualified persons with disabilities.

Employment opportunities will be afforded to persons with disabilities who are qualified to perform the essential functions of the job with or without reasonable accommodation. CCAA will seek reasonable accommodations that do not result in undue hardship on business operations for qualified individuals with disabilities.

Furthermore, CCAA will comply with federal law and state law regarding the accommodations that are made necessary for persons with disabilities.

Section: General Information
Policy: Political Affiliations
Policy No.: 210
Effective: 02/01/1995
Revised: 10/28/2014

210 - POLITICAL AND SECTARIAN ACTIVITIES

Political Activity

Employment by this agency shall not be offered as a reward, nor shall non-employment be exercised as a result of an applicant's personal political activity, personal support of a political party or candidate. Employees may engage in partisan political activities, other than becoming a candidate for a partisan political office, during non-duty time and/or while on annual leave, or leave without pay.

No funds received by this agency shall be used for any political activity, including any activity undertaken to influence the outcome of any election or passage or defeat of any legislative measure.

The agency shall not engage in any political activities in violation of 5 U. S.

C. 15-Political Activity of Certain State and Local Employees, which prohibits influencing elections, taking part in political campaigns. The agency shall be deemed to be a state or local agency for purposes of Chapter 15.

The agency or employees/active-volunteers thereof shall not engage in activities to provide voters and prospective voters with transportation to the polls or provide similar assistance in connection with an election or any voter registration.

Sectarian Activities

No funds received by Cornerstone Community Action Agency shall be used, either directly or indirectly, to support any religious or anti-religious activity.

Section: General Information
Policy: Public Statements/Appearances
Policy No.: 211
Effective: 05/08/2012
Revised: 10/27/2015

211 – PUBLIC STATEMENTS & APPEARANCES

Employees may not speak to the press as an official representative of Cornerstone Community Action Agency without prior clearance from the Executive Director. All inquiries from the press should be referred to the Executive Director.

Any employee asked by an outside agency or organization to appear as a guest speaker or invited program participant must obtain prior clearance from the Executive Director.

Any deviation from this policy could lead to disciplinary action, up to and including termination of employment.

Section: General Information
Policy: Tobacco Use
Policy No.: 212
Effective: 10/01/2009
Revised: 6/21/2022

212 – TOBACCO/NICOTINE USE

This policy applies to all persons in Cornerstone Community Action Agency facilities. Tobacco is defined to include any lighted or unlighted cigarette, cigar, pipe, clove cigarette, e-cigarette/vape, and any other smoking product, and spit tobacco in any form.

All staff, volunteers, Board of Directors, and contracted employees may not use tobacco/nicotine products anywhere on CCAA's premises, in company vehicles, or during agency activities.

Violations of the tobacco use policy will lead to disciplinary action up to and including termination.

Section: General Information
Policy: Workplace Violence Prevention
Policy No.: 214
Effective: 08/26/2003
Revised: 10/27/2015

214 - WORKPLACE VIOLENCE PREVENTION

To prevent workplace violence and to maintain a safe work environment, Cornerstone Community Action Agency does not tolerate acts of workplace violence committed by or against employees and/or all persons involved in CCAA's operation. Employees are prohibited from making threats or engaging in violent acts. The safety and security of all employees is of primary importance at CCAA. Threats, stalking, threatening and abusive behavior, or acts of violence against employees, visitors, customers/clients, or by anyone on company property, on a company-controlled site, or in connection with company employment or company business will not be tolerated (even those made in jest).

Any person who makes threats, stalks, exhibits threatening behavior, or engages in violent acts on company premises, on a company-controlled site, or in connection with company employment or company business shall be removed from the premises as quickly as safety permits and shall remain off company premises pending the outcome of an investigation. Following investigation, the organization will initiate an immediate and appropriate response. This response may include but is not limited to suspension and/or termination of any business relationship, reassignment of job duties, suspension or termination of employment, and/or civil or criminal prosecution of the person or persons involved.

All employees, volunteers, Board of Directors, and community members should be treated with courtesy and respect at all times. Employees are expected to refrain from fighting, horseplay, or other conduct that may alarm or be dangerous to others.

All threats of violence, or violence acts, whether direct or indirect, should be reported immediately to the Executive Director. This includes threats by employees, community members, vendors, solicitors, or other members of the public. The Executive Director should attempt to obtain the most specific and detailed information as possible from the affected individual.

All suspicious individuals or activities should also be reported as soon as possible to the Executive Director.

Conduct that threatens, intimidates, or coerces another employee, parent, child, or member of the public at any time, including off-duty periods, will not be tolerated. This prohibition includes all acts of harassment (refer to Harassment Policy).

CCAA will thoroughly and promptly investigate all reports of threats of violence, actual violence, or suspicious individuals and activities.

Anyone determined to be responsible for threats of or actual violence or other conduct is in violation of these guidelines and will be subject to prompt disciplinary actions up to and including suspension/termination and/or legal action as appropriate.

There will be thorough and prompt investigations of disputes or differences among employees. These will be brought to the attention of the Executive Director before the situation escalates into potential violence. CCAA is eager to assist in the resolution of employee disputes and will not discipline employees for raising such concerns (See 222 - Problem Resolution Policy).

All employees are responsible for notifying management of any threats that they witness or receive or that they are told another person witnessed or received. Even without a specific threat, all employees should report any behavior they have witnessed that they regard as potentially threatening or violent or that could endanger the health or safety of an employee when the behavior has been carried out on company premises, on a company- controlled site, or is connected to company employment or company business. Employees are responsible for making this report regardless of the relationship between the individual who initiated the threatening behavior and the person or persons being threatened.

The organization understands the sensitivity of the information requested and has developed confidentiality procedures that recognize and respect the privacy of the reporting employee.

Dangerous or hazardous substances are not prohibited on the premises.

Section: General Information
Policy: Standards of Conduct
Policy No.: 216
Effective: 02/01/1995
Revised: 10/27/2015

216 - STANDARDS OF CONDUCT

Cornerstone Community Action Agency expects all employees to observe certain standards of behavior while at work and at company-sponsored events. These standards are not intended to restrict employees, but to ensure a consistent application of the policies and procedures for all employees and to protect the interests and safety of all employees and the agency.

These standards include but are not limited to:

- Violation of any agency rule or policy the CCAA deems detrimental to its efforts to operate;
- Failure to maintaining satisfactory attendance and punctuality;
- Failure to perform duties and operating equipment with care to protect the safety of employees, coworkers, and the public;
- Failure to carry out assigned duties and follow reasonable instructions or requests from supervisors and/or management;
- Negligence or any careless action which endangers the life or safety of another person;
- Being under the influence of a controlled substance or alcohol while at work; use, possession, or sale of a controlled substance in any quantity while on CCAA premises, except medications prescribed by a physician which do not impair work performance. Employees are responsible for notifying their supervisors that they are taking prescription medication if it would affect their performance on the job;
- Refraining from any manner or form of discrimination and/or harassment, regardless of whether it is sexual, racial, religious, or related to another's gender, age, sexual orientation, or disability;
- Failure to adhere to fiscal policies and procedures;
- Engaging in criminal conduct or acts of violence, or making threats of violence toward anyone on CCAA premises or when representing the agency; disorderly conduct, fighting, or provoking a fight on CCAA property;
- Excessive absenteeism or any absence without approval;
- Theft or unauthorized possession of CCAA property or the property of fellow employees; removal of any CCAA property, including documents, from the premises without prior permission from management; unauthorized use of CCAA equipment or property for personal reasons; using CCAA equipment for profit;
- Dishonesty, falsification, misrepresentation, or material omission on your application for employment or other work records; lying about medical or personal leave; falsifying reason for a leave of absence or other data requested by CCAA; alteration of CCAA records or other agency documents;
- Violating confidentiality policy; giving confidential or proprietary information of the agency to competitors or other organizations or individuals or to unauthorized CCAA employees; breach of confidentiality of personnel information;

- Obscene or abusive language toward any person; any disorderly/antagonistic conduct on CCAA premises;
- Failure to immediately report damage to, or an accident involving, CCAA equipment/property;
- Working unauthorized overtime or working before shift starts;
- Using company telephones for company purposes only; limit personal calls on company phones; and not incur charges for personal calls to agency;
- Engaging in conduct unbecoming an employee of CCAA and/or conduct that appears to reflect badly upon the organization;

While it is impossible to list every type of behavior that may be deemed a serious offense, this policy includes some examples of problems that may result in immediate suspension or termination of employment. However, the problems listed are not all necessarily serious offenses, but may be examples of unsatisfactory conduct that will trigger progressive discipline. By using progressive discipline, we hope that most employee problems can be corrected at an early stage, benefiting both the employee and CCAA.

Failure to observe the above standards could lead to corrective action up to and including termination.

Section: General Information
Policy: Drug and Alcohol Use/Testing
Policy No.: 217
Effective: 05/27/2008
Revised: 06/21/2022

217 – DRUG AND ALCOHOL USE/TESTING

Cornerstone Community Action Agency ensures the health and safety of others in accordance with the Drug Free Workplace Act of 1988. Accordingly, the unlawful manufacture, distribution, dispensing, possession, use, and being under the influence of a controlled substance, including cannabis and alcohol, are prohibited on CCAA premises.

Any employee that has engaged in drug abuse violations occurring in the workplace will be suspended/terminated immediately and/or required to participate in a substance abuse rehabilitation or treatment program. Such violations may have legal consequences. The legal use of prescribed drugs is permitted on the job only if it does not impair an employee's ability to perform the essential functions of the job effectively and in a safe manner that does not endanger other individuals in the workplace. We encourage employees to volunteer this information to the immediate supervisor to ensure that all health and safety precautions are taken for all persons involved.

Employees are required to notify the Program Director of any criminal conviction under a drug or alcohol statute no later than five (5) days after such conviction.

An employee with a drug or alcohol problem that has not resulted in, and is not the immediate subject of, disciplinary action may request approval to take unpaid time off to participate in a rehabilitation or treatment program under CCAA's health insurance benefit coverage or another legitimately recognized rehabilitation program. Leave may be granted if the employee agrees to abstain from the use of the problem substance; abides by all policies, rules, and prohibitions relating to conduct in the workplace; and provided that such leave will not cause CCAA undue hardship.

CCAA has the right to require blood and/or urine samples in any of the following situations:

- All candidates for employment may be required to submit blood and/or urine samples as a condition of an employment offer. This testing will be done at the same time and in conjunction with the employment physical examination, if required. In the event that the drug test is positive, the employment offer will immediately be rescinded.
- Each prospective employee will be informed of our drug-free workplace policy at the time of the interview and again at the time of the employment offer.
- A current employee involved in any accident involving injury or CCAA property damage at the work site or while on duty.
- CCAA has reasonable suspicion that an employee's behavior is being influenced by one or more illegal drugs, alcohol, or misuse of a controlled substance.

Employees refusing to submit to a test or testing positive for drugs or alcohol will be subject to disciplinary action up to and including suspension/termination. CCAA will determine, on a case-

by-case basis, whether first-time offenders will be allowed to seek counseling/rehabilitation as an alternative to suspension/termination.

Any employee testing positive has the right to appeal the results and have the original sample retested at his/her expense. If the test again indicates a positive result, CCAA may take disciplinary action up to and including immediate suspension/termination.

Section: General Information
Policy: Harassment and/or Discrimination
Policy No.: 218
Effective: 04/27/2010
Revised: 06/21/2022

218 - HARASSMENT AND/OR DISCRIMINATION

Harassment, either intentional or unintentional, will not be allowed in the workplace. CCAA prohibits, and will not tolerate any form of, harassment of or by any employee or individual within the Organization (whether managerial or non- managerial) based on race, color, religion, sex, national origin, age, disability (physical or mental), veteran status, pregnancy, marital status, medical condition, sexual orientation, or any status protected by federal and state law and regulation.

Sexual harassment includes unwelcome sexual advances, requests for sexual favors, and other physical or verbal conduct of a sexual nature when it meets any of the following:

- Submission to such conduct is either explicitly or implicitly made a term or condition of an individual's employment.
- Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual.
- Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive environment for working.
- Some incidents of physical assault.
- Direct or implied threats that submission to sexual advances will be a condition of employment, work status, or promotion.
- Direct propositions of a sexual nature and/or subtle pressure for sexual activity that is unwanted and unreasonably interferes with a person's work.
- Sexual comments or inappropriate references to gender or physical characteristics.
- Sexually explicit statements, questions, jokes, or anecdotes regardless of the means of communication (oral, written, electronic, etc.).
- Unwanted touching, patting, hugging, brushing against a person's body, or staring.
- Inquiries and comments about sexual activity, experience, or orientation.
- The display of inappropriate sexually oriented materials in a location where others can view them.

All persons involved in the Organization are entitled to work in an atmosphere free of harassment of any kind. Individuals may occasionally make statements or use words, objects, or pictures that others could interpret as being insulting or derogatory toward persons based on their race, color, religion, sex, national origin, age, disability (physical or mental), veteran status, pregnancy, marital status, medical condition, sexual orientation, or any other status protected by federal and state law or regulation.

Such conduct may make a reasonable person uncomfortable in the work environment or could interfere with an employee's ability to perform his or her job. Comments or actions of this type, even if intended as a joking matter among friends, are always inappropriate in the workplace and will not be tolerated.

Any individual, regardless of position, who has a complaint of, or who witnesses, harassment at work by anyone has a responsibility to immediately bring the matter to the attention of the immediate supervisor within three (3) calendar days of the offense. Employees are not required to approach the person who is harassing and/or discriminating against them, and they may bypass any offending member of management. ***If an employee reports an incident, the Program Director or Executive Director is responsible for immediately investigating the alleged incident.***

CCAA will make every reasonable effort to conduct all proceedings in a manner that will protect the confidentiality of all parties. Parties to the complaint should treat the matter under investigation with discretion and respect for the reputation of all parties involved. Interviews, allegations, statements, and identities will be kept confidential to the extent possible and allowed by law. However, CCAA will not allow the goal of confidentiality to be a deterrent to an effective investigation.

Complainants will be asked to provide a written description of their complaint to the person in charge of the investigation.

Once a complaint has been accepted for review, an investigation will begin. The investigation may include, but is not limited to, review of written statements from both parties, witness interviews, obtaining witness declarations, review of documentation, and on-site investigation. Any person conducting an investigation will maintain a written record of all witness interviews, evidence gathered, the outcome of the investigation, and any other appropriate documents. Records of such an investigation will not be maintained in personnel files unless they are part of a formal corrective action.

Results of the investigation will be shared with the appropriate people. When there is sufficient evidence to support the complaint, written notification of investigative findings will be sent to the complainant and the respondent.

If it is concluded that discrimination, harassment, or retaliation has occurred, a determination will be made as to the appropriate sanctions or corrective action. Appropriate corrective action, up to and including suspension/termination, will be taken promptly against any employee engaging in discrimination and/or harassment. The corrective action issued will be proportional to the severity of the conduct. The alleged harasser's employment history and any similar complaints of prior unlawful discrimination and/or harassment will be taken into consideration.

CCAA prohibits retaliation of any kind against employees, who, in good faith, reports harassment and/or discrimination or assists in investigating such complaints.

Section: General Information
 Policy: Personal Appearance/Dress Code
 Policy No.: 219
 Effective: 04/27/2010
 Revised: 06/21/22

219 – PERSONAL APPEARANCE/DRESS CODE

While it is the intent of Cornerstone Community Action Agency that all employees dress for their own comfort during work hours, the professional image of our organization is maintained, in part, by the image that our employees present to customers, families/ clients, vendors, and other visitors.

All employees are required to present a positive image to the public and clients. Accordingly, each employee is required to wear appropriate attire while conducting business. The Executive Director is responsible for establishing a reasonable dress code appropriate to the job you perform.

If a supervisor feels an employee’s personal appearance is inappropriate, the employee may be asked to leave the workplace until they are properly dressed or groomed. Under such circumstances, the employee will not be compensated for the time away from work. Consult the Program Director if there are questions as to what constitutes appropriate appearance.

At all times appearance will be neat and professional. All employees will be expected to wear appropriate attire. Appropriate dress is defined below, although job and work location should be taken into account as well.

PANTS	
<i>Appropriate</i>	<i>Inappropriate</i>
<ul style="list-style-type: none"> • Khakis or corduroys • Jeans • Capris • Slacks/Trousers 	<ul style="list-style-type: none"> • Sweatpants, exercise wear, yoga pants • Leggings (except under dresses or long loose fitting tops that extend enough to fully cover front and back sides, <i>must not be see through</i>) • Ripped, frayed, holes, patches in jeans/pants • Low cut jeans unless your top/shirt/blouse fully covers your front and backside when bending/sitting/squatting • Shorts (unless prior approval of Executive Director is obtained) • Scrub bottoms

SHIRTS – Must fully cover mid-section/stomach/back area when hands are raised above the head or when squatting/bending	
<i>Appropriate</i>	<i>Inappropriate</i>
<ul style="list-style-type: none"> • Polo, collar, knit, or “golf” shirts • Oxford, or button-up shirts • Company logo wear • Short-sleeved blouses or shirts • Turtlenecks • Jackets or sweaters 	<ul style="list-style-type: none"> • T-shirts/Clothing with extensive and/or offensive graphics or messages (including political) is not permitted in the workplace or outside the workplace while conducting business. • Sweatshirts • Beachwear • Spaghetti straps (unless worn under another top or jacket) • Tube/halter tops • Exercise wear • Crop tops, clothing showing midriffs • Scrub tops
SHOES	
<i>Appropriate</i>	<i>Inappropriate</i>
<ul style="list-style-type: none"> • Must provide safe, secure footing and be appropriate to job duties. • Classroom staff working directly with children must wear closed toed, closed heeled shoes appropriate for interacting with children in the classroom and on the playground. Tennis Shoes or other shoes with rubber soles is recommended • Food service staff must comply with health department regulations for food service areas 	<ul style="list-style-type: none"> • Flip-flops (light sandal, typically of plastic or rubber)
PERSONAL APPEARANCE / HYGEINE / JEWELRY	
<i>Appropriate</i>	<i>Inappropriate</i>
<ul style="list-style-type: none"> • Employees are expected to have a clean, neat, and professional appearance • Appropriate undergarments are required 	<ul style="list-style-type: none"> • Stained, wrinkled, dirty clothing • Clothing with tears/holes • Offensive body odor • Unnatural hair coloring • Strong fragrances/cigarette smoke

<ul style="list-style-type: none">• Mustaches and beards must be clean, well-trimmed and neat• Hairstyles must be of a natural color• Perfume, cologne, and aftershave lotion in moderation (or avoided all together as some individuals may be sensitive to strong fragrances).• Earrings, necklaces, rings, bracelets as long as they are not functionally restrictive, dangerous to job performance, or excessive• Company logo caps (worn forward facing)	<ul style="list-style-type: none">• Facial jewelry (eyebrow rings, nose rings/studs, lip rings, tongue studs)• Torso body piercings with visible jewelry, jewelry that can be seen through or under clothing
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If employees require a reasonable accommodation regarding their dress for bona fide health and/or religious reasons, they should contact the Program Director to discuss an exception to the personal appearance guidelines. Unless it would constitute an undue hardship or safety hazard, CCAA will accommodate such requests.

All employees should practice commonsense rules of neatness, good taste, and comfort. CCAA Executive Director/Program Directors/Supervisors reserve the right to determine appropriate attire at all times and in all circumstances and may send employees home to change into appropriate work attire should it be determined their attire is inappropriate. Non-exempt employees will not be compensated for this time away from work. If an employee continues to violate the personal appearance/dress code policy, supervisors will follow the corrective action process.

Section: General Information
Policy: Workplace Activity Monitoring
Policy No.: 220
Effective: 08/26/2003
Revised: 10/27/2015

220 – WORKPLACE ACTIVITY MONITORING

Cornerstone Community Action Agency maintains the right to conduct workplace monitoring for the purposes of quality control, employee safety, security, and the satisfaction of those serviced by CCAA is sensitive to the legitimate privacy rights of staff, volunteers, and those served. Every effort will be made to conduct workplace monitoring in an ethical and respectful manner.

Because even a routine inspection or search might result in the viewing of an employee's personal possessions, employees are encouraged not to bring any item of personal property into the workplace that they do not want revealed to the organization.

Employees who regularly communicate with those served by CCAA may have their telephone conversations monitored or recorded. Telephone monitoring is used to identify positive interactions and to collect and correct performance problems through targeted training.

CCAA may conduct video surveillance of non-private workplace areas. Video monitoring is used to identify safety concerns, maintain quality control, detect theft and misconduct, and discourage or prevent acts of harassment and workplace violence.

Any prohibited materials (or materials that may be found to be prohibited) that are found in an employee's possession during an inspection or search will be collected by management and placed in a sealed container or envelope. The employee's name, date, circumstances under which the materials were collected, and by whom they were collected will be recorded and attached to the container or written upon the envelope. If, after further investigation, the collected materials prove not to be prohibited, they will be returned to the employee and the employee will sign a receipt for the contents. If the prohibited materials prove to be illegal and/or dangerous, they will not be returned to the employee, but will be turned over to the appropriate law enforcement agency.

From time to time and without prior announcement, inspections or searches may be made of anyone entering, leaving, or on the premises or property of the company (including alcohol and/or drug screens or other testing). Refusal to cooperate in such an inspection or search (including alcohol and/or drug screens) is grounds for termination.

Employees can request access to information gathered through workplace monitoring that may impact employment decisions. Access will be granted unless there is a legitimate business reason to protect confidentiality or an ongoing investigation.

Section: General Information
Policy: Solicitation
Policy No.: 221
Effective: 08/26/2003
Revised: 10/27/2015

221 - SOLICITATION

Solicitation or distribution of products and services during work time by both employees and non-employees is prohibited. Working time does not include lunch periods, work breaks, or any other periods in which employees are not on duty.

Solicitation includes, but is not limited to, asking employees for funds or contributions, offering goods for sale, asking employees to sign a petition, requesting employees to join a group, or otherwise requesting employees' support or commitment with respect to causes, groups, or interests.

The posting of written solicitations on company bulletin boards is restricted. If employees have a message of interest to the workplace, they may submit it to the Executive Director for approval.

Section: General Information
Policy: Problem Resolution
Policy No.: 222
Effective: 02/01/1995
Revised: 10/17/2017

222 - PROBLEM RESOLUTION

CCAA strives to ensure fair and honest treatment of all employees and volunteers. Supervisors, employees, and volunteers are expected to treat each other with mutual respect. Employees and volunteers are encouraged to offer positive and constructive criticism. Employees and volunteers will be given an opportunity to present their complaints and to appeal decisions by management through a formal complaint and grievance procedure. All complaints or incidents will be documented and placed in a file separate from the employee's personnel file. This policy in no way alters the policy of employment-at-will.

If employees or volunteers disagree with established rules of conduct, policies, or practices, they can express their concern through the problem resolution procedure. No employee or volunteer will be penalized, formally or informally, for voicing a complaint with CCAA in a reasonable, business-like manner, or for using the problem resolution procedure. However, employees or volunteers who have problems or complaints and do not follow this policy, and instead of attempting to resolve the issue in a positive, productive manner, address their concerns to fellow staff, clients, the community or other inappropriate ways not consistent with this policy, may be subject to disciplinary action up to and including termination.

If a situation occurs when employees or volunteers believe that a condition of employment or volunteer placement, or a decision affecting them is unjust or inequitable, they are encouraged to make use of the following steps. The complaint or issue will need to be presented in writing and clearly identify the basis for the complaint and contain the following information: the specific conflict on which the complaint is based, the date the actions or incidents occurred, the reasons why the employee or volunteer feels that the action was unjustified or unfair, plus any specific policy which was violated, and how this affected the employee or volunteer and the corrective action desired by the employee or volunteer.

1. **Program Director:** All grievances should be presented to the Program Director within fourteen (14) calendar days after an incident occurs. The individual and Program Director should attempt to address the problem through discussion. The Program Director will document the discussion. If the problem involves the Program Director or if the Program Director cannot resolve the issue, the employee or volunteer should proceed to the Executive Director. The Program Director will respond within fourteen (14) calendar days.
2. **Executive Director:** The problem must be presented to the Executive Director in writing within fourteen (14) calendar days. The Executive Director will review and consider the problem. The Executive Director will inform the individual of the decision within fourteen (14) calendar days and forward a copy of the written response to the Executive Assistant for appropriate filing. The Executive Director has full authority to make any adjustment deemed appropriate to resolve the problem.

Not every problem can be resolved to everyone's total satisfaction, but only through understanding and discussion of mutual problems can employees or volunteers and management develop confidence in each other. This confidence is important to the operation of an efficient and harmonious work environment, and helps to ensure everyone's job security.

Section: General Information
Policy: Workplace Etiquette
Policy No.: 223
Effective: 08/26/2003
Revised: 10/27/2015

223 – WORKPLACE ETIQUETTE

Cornerstone Community Action Agency strives to maintain a positive work environment where employees treat each other with respect and courtesy. Sometimes issues arise when employees are unaware that their behavior in the workplace may be disruptive or annoying to others. Many of these day-to-day issues can be addressed by politely talking with a co-worker to bring the perceived problem to his or her attention. In most cases, common sense will dictate an appropriate resolution. CCAA encourages all employees to keep an open mind and graciously accept constructive feedback or a request to change behavior that may be affecting another employee's ability to concentrate and be productive.

The following workplace etiquette guidelines are necessarily intended to be hard and fast work rules with disciplinary consequences. They are simply suggestions for appropriate workplace behavior to help everyone be more conscientious and considerate of co-workers and the work environment. Please contact the Program Director if you have comments, concerns, or suggestions regarding these workplace etiquette guidelines.

- Avoid public accusations or criticisms of other employees. Address such issues privately with those involved or the Program Director
- Try to minimize unscheduled interruptions of other employees while they are working
- Communicate by email or phone whenever possible, instead of walking unexpectedly into someone's office or workspace
- Be conscious of how your voice travels, and try to lower the volume of your voice when talking on the phone or to others in open areas
- Keep socializing to a minimum, and try to conduct conversations in areas where the noise will not be distracting to others
- Monitor the volume when listening to music, voice mail, or a speakerphone that others can hear
- Clean up after yourself and do not leave behind waste or discarded papers

Section: General Information
Policy: Electronic Media Use
Policy No.: 224
Effective: 04/12/2010
Revised: 06/21/2022

224 – ELECTRONIC MEDIA USE

All persons with access to Internet, intranet, and e-mail systems are responsible for seeing that they are used properly and in accordance with the following policy:

1. The Internet, intranet, and e-mail systems are for business purposes. Conducting personal business should be limited to lunch, breaks, before or after work.
2. At no time should any subject matter of a sexual nature be viewed.
3. There is no personal privacy in any matter created, received, or sent from the internet or e-mail system. Cornerstone Community Action Agency, at its discretion, reserves the right to monitor and access any matter created in, received through, or sent from the Internet or e-mail system.
4. Each employee is responsible for the messages that are sent from his or her computer. Employees with e-mail passwords should not share their passwords with anyone.
5. All e-mails must follow CCAA's policy banning solicitation and distribution. Chain letters, pyramid schemes, and other solicitations are prohibited.
6. No e-mail that constitutes intimidating, hostile, or offensive material on the basis of race, color, religion, sex, national origin, age, disability (physical or mental), veteran status, pregnancy, marital status, medical condition, sexual orientation, or any other status protected by federal, state, or local law or regulation may be created, sent, or received at any time. CCAA's policy against harassment applies fully to the Internet and e-mail system.
7. The unauthorized use, installation, copying, or distribution of copyrighted, trademarked, or patented material on the Internet is expressly prohibited. Employees are also responsible for ensuring that the person sending any material over the Internet has the appropriate distribution rights.
8. To ensure a virus-free environment, no files may be downloaded from the Internet unless the origin of the message is known. E-mail messages and attachments should not be opened unless the sender is known to the receiver.
9. CCAA purchases and licenses the use of various computer software for business purposes and does not own the copyright to this software or its related documentation. Unless authorized by the software developer, neither CCAA nor any of its employees may reproduce such software for use on more than one computer.
10. Employees who become aware of misuse of the Internet, intranet, or e-mail system should promptly contact their immediate supervisor.

Employees are expected to communicate with courtesy and restraint to both internal and external recipients. Typographical or grammatical errors and misspellings denote lax work habits and are a reflection on the competency and professionalism of the writer. It is recommended that using all capital letters, shorthand idioms, unfamiliar acronyms, and/or slang should be avoided when using e-mail. The rule to observe with all communications is that employees should not say or write anything that they would not want someone other than the intended receiver to hear or

read. Remember that even when communications have been deleted from a location, it is still possible to retrieve and read those messages.

Brief and occasional personal use of e-mail is acceptable as long as it is not excessive or inappropriate, does not occur during work time, does not violate any of the prohibitions listed in the Use of Computers and Internet Policy, and does not result in expenses to CCAA.

(See Use of Social Media Policy #201)

Section: General Information
Policy: Progressive Discipline
Policy No.: 225
Effective: 02/01/1995
Revised: 10/27/2015

225 – PROGRESSIVE DISCIPLINE

The purpose of this policy is to state Cornerstone Community Action Agency's position on administering equitable and consistent discipline for unsatisfactory conduct in the workplace. The best disciplinary measure is the one that does not have to be enforced and comes from good leadership and fair supervision at all employment levels.

When it becomes necessary to address an employee's actions in the workplace, general guidelines of acceptable business conduct will govern. Depending upon the nature and seriousness of the employee's actions, progressive discipline may begin at any step of the corrective action process. The process should ensure that employees are informed of exactly what behavior needs to be corrected, inform employees of the measures they must take to correct unacceptable behavior, and give employees adequate opportunity to correct the situation.

CCAA's own best interest lies in ensuring fair treatment of all employees and in making certain that disciplinary actions are prompt, uniform, and impartial. The major purpose of any disciplinary action is to correct the problem, prevent recurrence, and prepare the employee for satisfactory service in the future.

Although employment with CCAA is based on mutual consent and both the employee and CCAA have the right to terminate employment at will, with or without cause or advance notice, CCAA may use progressive discipline at its discretion.

Disciplinary action may call for any of the following responses:

- Warning (verbal/record of conference)
- Written (record of conference)
- Performance improvement plan
- Suspension without pay
- Termination of employment – depending on the severity of the problem, the number of infractions, the past record of the employee, and the circumstances surrounding the matter.

CCAA reserves the right to review each rule violation in its entirety and based on the severity, to use whatever form of discipline that we deem necessary for the elimination and non-reoccurrence of the infraction.

Progressive discipline means that, with respect to most disciplinary problems, these steps will normally be followed: a first offense may call for a warning; a next offense may be followed by a written Record of Conference or a written performance improvement plan; and still another offense may then lead to termination of employment.

Additionally, immediate suspension without pay may be utilized when warranted.

There may be circumstances when one or more steps are bypassed.

While it is impossible to list every type of behavior that may be deemed a serious offense, the Employee Standards of Conduct policy includes examples of, but not limited to, problems that may result in immediate suspension or termination of employment.

However, the problems listed are not all necessarily serious offenses, but may be examples of unsatisfactory conduct that will trigger progressive discipline.

By using progressive discipline, we hope that most employee problems can be corrected at an early stage, benefitting both the employee and CCAA

Section: General Information
Policy: Company Supplies
Policy No.: 226
Effective: 08/26/2003
Revised: 10/27/2015

226 - COMPANY SUPPLIES

Use of company office supplies are not for personal use.

CCAA's stationery/letterhead may not be used for personal correspondence as any communication sent out on company stationery/letterhead might be considered official communication.

Section: General Information
Policy: Whistleblower & Complaint Resolution
Policy No.: 227
Effective: 04/23/2013
Revised: 06/21/2022

227 – WHISTLEBLOWER & COMPLAINT RESOLUTION POLICY

In keeping with Cornerstone Community Action Agency's policy of maintaining the highest standards of conduct and ethics, CCAA will investigate complaints of suspected fraudulent or dishonest use or misuse of its resources or property by staff, board members, consultants, volunteers, or clients. To maintain the highest standards of service, CCAA will also investigate complaints concerning its programs and services.

Staff, board members, consultants, volunteers, clients, and community members are encouraged to report suspected fraudulent or dishonest conduct or problems with services provided, pursuant to the procedures set forth below. This policy supplements, and does not replace, any procedures required by law, regulation, or funding source requirements.

Reporting. A person's concerns about possible fraudulent or dishonest use or misuse of resources or property, or program operation, should be reported: to the immediate supervisor. If, for any reason, a person finds it difficult to report his or her concerns to such person, he/she may report the concerns directly to the Executive Director. Alternatively, to facilitate reporting of suspected violations where the reporter wishes to remain anonymous, a written statement may be submitted to one of the individuals listed above.

Investigation: All relevant matters, including suspected but unproved matters, will be promptly reviewed and analyzed, with documentation of the receipt, retention, investigation, and treatment of the complaint. Appropriate corrective action will be taken, if necessary, and findings may be communicated to the reporting person and his or her supervisor if appropriate. Investigations may be conducted by independent persons such as auditors and/or attorneys. Investigators will endeavor to maintain appropriate confidentiality, but confidentiality is not guaranteed.

No Retaliation. No director, officer, employee, volunteer, or client who in good faith reports suspected fraudulent or dishonest use or misuse of its resources or property or complaints concerning the services it provides and programs CCAA runs shall suffer harassment, retaliation, or adverse employment or other consequence. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This Complain Resolution Policy is intended to encourage and enable employees and others to raise serious concerns within the organization prior to seeking resolution outside the organization. The Policy is in addition to any non-retaliation requirements contained in the CCAA Personnel Policies or required by law.

This protection from retaliation is not intended to prohibit supervisors from taking action, including disciplinary action, in the usual scope of their duties and based on valid performance-related factors. Individuals making complaints must be cautious to avoid baseless allegations; employees who intentionally make false allegations are subject to disciplinary action in accordance with the CCAA Personnel Policies.

Section: Employment
Policy: Pre-Employment Checks
Policy No.: 301
Effective: 04/24/2012
Revised: 09/06/2017

301 – PRE-EMPLOYMENT CHECKS

To ensure pre-employment checks are conducted within legal and professional limits to be employed in the position for which the candidate is applying, Cornerstone Community Action Agency will conduct pre-employment investigation for all candidates to determine or verify background information, including criminal history and information in compliance with the Fair Credit Reporting Act (FCRA). Having a criminal history or criminal conviction will not necessarily preclude employment.

All candidates applying for any position with Cornerstone Community Action Agency will be subject to reference checks with former employers and/or managers and such other references as listed by the candidate. A candidate's representation of certain educational credentials, either in writing, in an interview or in any other manner communicated to Cornerstone Community Action Agency, are subject to verification.

Pre-employment investigation applies to all new hires, as a condition of employment. Employment will be contingent upon the results of the pre-employment investigation. A candidate who provides misleading, erroneous, or deceptive information on the application form, resume, or in an interview or in any other manner communicated to Cornerstone Community Action Agency will be eliminated from further consideration for employment.

Section: Employment
Policy: Immigration Policy
Policy No.: 302
Effective: 02/01/1995
Revised: 10/27/2015

302 - IMMIGRATION POLICY

Cornerstone Community Action Agency complies with the regulations of the Immigration Reform and Control Act of 1986 (IRCA) as enforced by the Department of Homeland Security. This Act requires that all employees provide appropriate documentation to prove that they are eligible to work in the United States.

CCAA requires, as a condition of employment, that all new hires must complete the employment eligibility verification INS Form I-9. In addition to completing the I-9, all new hires must present the required documentation establishing identity and employment eligibility within the first three (3) days of employment. Failure to do so may result in the offer of employment being withdrawn or withheld.

All former employees who are rehired are also required to complete a new I-9 if:

- They did not complete an I-9 for CCAA within the previous three (3) years, or
- Their previous I-9 is no longer valid, or
- Their previous I-9 was not retained.

Section: Employment
Policy: Identification Badges
Policy No.: 303
Effective: 01/24/2012
Revised: 06/21/2022

303 - IDENTIFICATION BADGES

Human Resources issues an ID badge for new employees during orientation on their first day of employment. Loss or damage of the ID badge should be reported to Human Resources immediately in order for the badge to be replaced. The badge is the property of Cornerstone Community Action Agency and must be returned upon termination of employment. Because employee ID badges also are the means by which employees are recognized, employees must not loan their badges to anyone, including other employees, nor should employees use their badges to allow anyone to enter the premises that the employee does not know to be an employee of CCAA. Failure to observe these safety regulations could endanger the safety and security of all other employees and could subject the employee to corrective action up to and including termination.

Employees are not required to wear their ID badges on a daily basis. However, if an employee is representing CCAA in the community, they will be required to wear an ID badge. Examples are, but not limited to, client meetings/appointments, community meetings, outreach, fundraisers, trainings, and conferences.

Section: Employment
Policy: Employment of Relatives/Nepotism
Policy No.: 304
Effective: 02/01/1995
Revised: 10/27/2015

304 – NEPOTISM-EMPLOYMENT OF RELATIVES/PERSONAL RELATIONSHIPS

CCAA prohibits employment of relatives in a direct reporting relationship to avoid creating or perpetuating circumstances in which the possibility of favoritism, conflict of interest, or impairment of efficient operations may occur.

Further, a person with an immediate family member serving on a board or committee, whom either by rule or practice regularly nominates, recommends, or screens candidates for positions with CCAA may not be employed.

For purposes of this policy, relatives are defined as “immediate family” meaning wife, husband, son, daughter, mother, father, brother, sister, step-children, in-laws (father, mother, brother, sister, son or daughter). Definition will be limited or expanded upon according to agreement with funding sources.

Relatives of current employees may not occupy a position that will be working directly for or supervising a relative. Individuals involved in a dating relationship with a current employee may also not occupy a position that will be working directly for or supervising the employee with whom they are involved in a dating relationship. CCAA also reserves the right to take prompt action if an actual or potential conflict of interest arises involving relatives or individuals involved in a dating relationship who occupy positions at any level (higher or lower) in the same line of authority that may affect the review of employment decisions.

If a relative relationship or partner sharing a home relationship is established after employment between employees, the individuals concerned will be given an opportunity to decide who is to resign. If a dating relationship is established after employment between employees who are in a reporting situation described above, it is the responsibility and obligation of the supervisor involved in the relationship to disclose the existence of the relationship to management. The individuals concerned will be given the opportunity to decide who is to be transferred to another available position. If that decision is not made within 30 calendar days, management will decide who is to be transferred, or if necessary, terminated from employment.

Violation of this policy will lead to corrective action up to and including termination of the management individual involved in the relationship.

Section: Employment
Policy: Recruitment & Selection
Policy No.: 305
Effective: 02/01/1995
Revised: 06/21/2022

305 - RECRUITMENT AND SELECTION

To maintain consistent procedures for recruiting and selecting applicants, Cornerstone Community Action Agency recruits and selects the most qualified applicants for available positions in compliance with all applicable federal and state laws and regulations and with the organization's commitment to Equal Employment Opportunity.

The Executive Director is engaged by the Board of Directors. When a vacancy occurs for the Executive Director's position, the Personnel Committee, as a body, will conduct interviews of all applicants considered qualified, and makes a recommendation of the top three choices, in order of preference, to the Board of Directors. The Board will also be furnished with a list of all interviewed applicants. The Board of Directors will then select an Executive Director from the list of applicants, by a two-thirds majority vote, of the present and voting, as stated in the By-Laws, Article III, Section 2.2.1.

When vacancies occur in administrative positions such as Program Director, Financial Director, Compliance Director, Executive Assistant or any other equivalent roll, the Executive Director will screen and interview all applicants considered qualified for the position. The Executive Director or Program Director will then select and hire the person for the opening. CCAA must ensure that the Board of Directors approves all policies and procedures regarding the hiring, evaluation, compensation, and termination of the above mentioned positions, including the Executive Director.

All other staff members may be selected and hired by the appropriate staff when approved by the Executive Director. Only staff or consultants who meet the required qualifications may be hired.

CCAA may choose to advertise internally for vacant positions prior to outside advertisement. Preference may be given to employees of the agency for promotion to a higher level position without outside advertisement for the vacant position.

Section: Employment
Policy: Employment Records Personnel File
Policy No.: 306
Effective: 02/01/1995
Revised: 06/21/2022

306 - EMPLOYMENT RECORDS/PERSONNEL FILE

Cornerstone Community Action Agency is required to keep accurate, up-to-date employment records on all employees to ensure compliance with state and federal regulations, to keep benefits information up to date, and to make certain that important mailings reach all employees. All information contained in personnel files is the property of CCAA and is considered confidential.

Employees must inform CCAA of any necessary updates to their personnel file such as a change of address, changed telephone numbers, emergency contact, marital status, number of dependents, or military status. Failure to inform Human Resources or the Executive Assistant of personal data changes may have a significant impact on benefits and the ability to contact the employee or a family member in the event of an emergency. In addition to a general personnel file, CCAA maintains a separate medical file on each employee. Access to an employee's medical file is extremely limited and based on a need-to-know only basis. A time sheet folder is also maintained for all employees which contains the W- 4, time sheets/activity reports, and a check stub/voucher.

Employees who wish to review their own file should make a written request to Human Resources or the Executive Assistant. All current employees will be permitted to review their personnel files at reasonable times with reasonable notice and in the presence of Human Resources or the Executive Assistant, with the following exceptions:

Exceptions to this include:

- Letters of reference
- Materials relating to employer staff planning and business development
- Information of a personal nature about another person, the disclosure of which could constitute an unwarranted invasion of privacy
- Investigatory or security records maintained by the employer to investigate employee misconduct or other conduct which could be harmful to the organization. Former employees will not be permitted to review their personnel files after leaving the organization.

Section: Employment
Policy: Employment References/Inquiries
Policy No.: 307
Effective: 02/01/1995
Revised: 06/28/2022

307 – EMPLOYMENT REFERENCES/INQUIRIES

To ensure that individuals who join Cornerstone Community Action Agency are well qualified and have a strong potential to be productive and successful, it is the policy of CCAA to check the employment and personal references of all applicants.

Employees should not provide references or any comments, written or verbal, to individuals requesting information on current or former employees. All requests for information should be referred to Human Resources. CCAA will only verify dates of employment and job titles to outside agencies inquiring by telephone. No other information will be given out about an employee without written authorization from the employee except what is required to comply with the law.

All inquiries regarding employees who are currently employed or have been previously employed by CCAA are to be referred to Human Resources. Frequently an employer will inquire about an employee's character or abilities. This information is considered confidential and may not be released. Human Resources will only provide confirmation of information provided by the employee or former employee to a third party unless special circumstances exist or the organization is compelled by law to release additional information. That information is limited to dates of employment and job title.

The only exception to the above statement is that Human Resources may release salary information to credit institutions when such information will assist the employee in securing credit, provided the request for salary information is made in writing and the employee authorizes release of the information.

Section: Employment
Policy: Introductory Period
Policy No.: 308
Effective: 2/01/1995
Revised: 10/27/2015

308 - INTRODUCTORY PERIOD

All new employees, rehired regular employees, and all current regular employees who have transferred or been promoted to a new position will be placed on introductory status for the first six months after their date of hire. The employee's date of hire and first day of work will be the employee's orientation date. After completing orientation, the employee will begin specified training for the position in which they were hired. If CCAA determines that the designated introductory period does not allow sufficient time to thoroughly evaluate the employee's performance, the introductory period may be extended for a specified period. The introductory period will not be considered an employment contract or that an employee is employed other than at will.

Transferred or promoted employees who do not meet job requirements in their new position during introductory period may be returned to their original job, if a vacancy exists, or be terminated at the discretion of CCAA

During the introductory period, new employees are eligible for those benefits that are required by law, such as workers' compensation insurance and social security. Full-time employees are eligible for other benefits which may include, health, life, and voluntary products after completing 60 days of employment from the date of hire. Employees should read the information for each specific benefit program for the details on eligibility requirements.

Section: Employment
Policy: Employment Applications
Policy No.: 309
Effective: 02/01/1995
Revised: 10/27/2015

309 - EMPLOYMENT APPLICATIONS

Cornerstone Community Action Agency does not accept applications and/or resumes except for positions that CCAA currently has open. All applications and/or resumes must designate the open position being applied for or they will be disposed of. CCAA will retain applications and/or resumes for one year. Individuals interested in applying more than once for employment must submit an updated application and/or resume each time they apply.

CCAA 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.

No individual can be made an offer of employment with CCAA without filling out CCAA's Application for Employment. All areas of the application must be completed even if a resume is included.

Section: Employment
Policy: Performance Appraisals
Policy #: 310
Effective: 02/01/1995
Revised: 06/21/2022

310 - PERFORMANCE APPRAISALS/PROFESSIONAL DEVELOPMENT PLANS

Supervisors and employees are strongly encouraged to discuss job performance and goals on an informal, day-to-day basis. A formal written performance appraisal will be conducted after an employee completes three (3) months of service. This allows the supervisor and the employee an additional three (3) months of the introductory period to discuss the job responsibilities, standards, and performance requirements of the new position. After the introductory period, performance appraisals will be completed on an annual basis. Supervisors may review performance more often than is required by this policy.

All Performance Review Forms will be reviewed with the immediate supervisor before the performance review conference takes place with the employee. When the Performance Appraisal Form has been reviewed with the employee, the employee and the employee's supervisor need to sign it. An employee's signature on his/her performance evaluation only acknowledges that it has been reviewed with the employee. Employees should be encouraged to attach any written comments they wish to their performance reviews. The Performance Review Form with any employee comments will become a part of the employee's personnel file. The completed form should be forwarded to Human Resources or the Executive Assistant and a copy provided to the employee.

Section: Employment
Policy: Job Descriptions
Policy No.: 311
Effective: 08/26/2003
Revised: 10/27/2015

311 - JOB DESCRIPTIONS

A job description is a formal document describing the nature, scope, physical requirements, and responsibilities of a specific job within the organization. Job descriptions are used for purposes of training and development, annual performance appraisals, promotions, recruiting, and hiring.

Supervisors and department managers are responsible for reviewing and approving job descriptions for their areas. Job descriptions may also be rewritten periodically to reflect any changes in the position's duties and responsibilities. All employees will be expected to help ensure that their job descriptions are accurate and current, reflecting the work being done.

Employees should remember that job descriptions do not necessarily cover every task or duty that might be assigned, and that additional responsibilities may be assigned as necessary. Contact your immediate supervisor or the Program Director if you have any questions or concerns about your job description.

Section: Employment
Policy: Employment at Will
Policy No.: 312
Effective: 02/01/1995
Revised: 10/27/2015

312 - EMPLOYMENT AT WILL

Nothing contained in this policy and procedure handbook or in any other materials or information distributed by the organization creates a contract of employment between an employee and Cornerstone Community Action Agency. Employment is on an at-will basis. This means that employees are free to resign their employment at any time for any reason, and CCAA retains that same right. No statements to the contrary, written or oral made either before or during an individual's employment can change this.

I understand that employment with CCAA is "at will," meaning that my employment may be terminated at any time, with or without notice, for any reason or no reason, by either CCAA or the employee. Completion of an introductory period will not change an employee's status as an employee-at-will or in any way restrict CCAA's right to terminate such an employee.

No employee other than the Executive Director has the authority to enter into any agreement guaranteeing your employment for any specific period of time or to make any written or oral promises, agreements or commitments contrary to this policy. Further, any employment agreement entered into by the Executive Director will not be enforceable unless it is in writing.

Section: Employment
Policy: Suspension/Termination
Policy No.: 313
Effective: 02/01/1995
Revised: 10/17/2017

313 - SUSPENSION/TERMINATION

Employees: Termination of employment is an inevitable part of personnel activity within any organization, and many of the reasons for termination are routine. Either the employer or employee may terminate the employment relationship at any time for any reason or no reason at all.

Voluntary terminations are those initiated by the employee and include:

- Resignation
- Retirement
- Death
- Failing to report to work as scheduled
- Failing to return from an approved extended leave of absence
- Failing to provide notification and obtain approval for absences of three or more consecutive days

Involuntary terminations are those initiated by CCAA and may include:

- Exhaustion of approved leave of absence
- Inability or failure to perform duties or to meet prescribed standards on the job
- Conduct not in the best interest of the agency
- Layoff resulting from changes in services, resources, or qualification requirements for designated programs or projects

An exit interview will be completed at the time of termination either in person or by mail. The exit interview will afford an opportunity to discuss such issues as employee benefits, conversion privileges, repayment of outstanding debts to CCAA, or return of CCAA owned property. Suggestions, complaints, and questions can also be voiced.

Employees will receive their final pay in accordance with applicable state law. Employee benefits will be affected by employment termination in the following manner. All accrued, vested benefits that are due and payable at termination will be paid. Some benefits may be continued at the employee's expense if the employee chooses. The employee will be notified in writing of the benefits that may be continued and of the terms, conditions, and limitations of such continuance.

Section: Employment
Policy: Resignation
Policy No.: 314
Effective: 04/12/2010
Revised: 06/21/2022

314 - RESIGNATION

Resignation is a voluntary act initiated by the employee to terminate employment with Cornerstone Community Action Agency. Although advance notice is not required, CCAA requests at least two weeks written resignation notice from all employees.

When employees leave CCAA, they will be asked to participate in an exit interview with their supervisor or by mail. The primary purpose of this exit interview is to ask for valuable feedback about employee's work experiences at CCAA. Participation in an exit interview is strictly voluntary and will not result in any negative consequences.

Section: Employment
Policy: Work Schedule/Hours of Work
Policy No.: 315
Effective: 02/01/1995
Revised: 06/21/2022

315 – WORK SCHEDULES/HOURS OF WORK

The normal work schedule for most employees is 8 hours a day, 5 days a week. Supervisors will advise employees of the times their schedules will normally begin and end. Staffing needs and operational demands may necessitate variations in starting and ending times, as well as variations in the total hours that may be scheduled each day and week.

Flexible scheduling, or flextime, is available in some cases to allow employees to vary their starting and ending times each day within established limits. However, such issues as staffing needs, the employee's performance, and the nature of the job will be considered before approval of flextime. Flextime scheduling must have prior approval of the supervisor.

Working from home will require approval from the Program Director and/or Executive Director. Measurable, verifiable work will be required in order to continue working from home.

Section: Employment
Policy: Equal Employment Opportunity
Policy No.: 316
Effective: 02/01/1995
Revised: 06/21/2022

316 - EQUAL EMPLOYMENT

As an equal opportunity employer, CCAA does not discriminate in its employment decisions on the basis of race, religion, color, national origin, gender, sex, sexual orientation, gender identity or expression, age, military status, disability, marital status, citizenship, national origin, genetic information, or on any other characteristic or basis that would be in violation of any applicable federal, state, or local law. Furthermore, CCAA will make reasonable accommodations for qualified individuals with known disabilities unless doing so would result in an undue hardship, safety, and/or health risk.

CCAA assures that all applicants for employment and all CCAA employees are given equal consideration based solely on job-related factors, such as qualifications, experience, performance and availability.

CCAA takes seriously and will investigate promptly and thoroughly all charges of alleged discrimination in employment, and informs CCAA employees of their rights in regard to equal employment.

CCAA distributes information regarding equal opportunity through the employee handbook, new employee orientation materials, training materials, staff meetings, and various publications. EEO-related complaints may be made to the Human Resources.

Funding sources requiring notification of Civil Rights complaints will be notified by CCAA upon their occurrence.

Section: Employment
Policy: Special Agreement Employees
Policy No.: 317
Effective: 03/27/2012
Revised: 10/27/2015

317 - SPECIAL AGREEMENT EMPLOYEES

Cornerstone Community Action Agency supplements the regular work force with volunteers and consultants when necessitated by periods of peak workload, employee absences, or other situations as determined by management. In addition, employment opportunities are offered for persons under the sponsorship of various employment programs or those persons interested in utilizing the organization to complete professional and technical internships.

A **consultant** is a person or company that provides CCAA with a particular service(s) required to meet the objectives of the program. CCAA pays the consultant for the services provided and will provide professional documents and certification giving evidence of the ability to conduct the services outlined in the contract. Consultants will be provided job descriptions and must meet qualifications in the area of service being provided. Consultants will also be provided orientation by CCAA. Proper documentation of time and attendance will be maintained by the consultant. It is the responsibility of the appropriate manager or Program Director to assure that all required reports are completed and submitted in a timely manner. All contracts for consultants will be forwarded to the Executive Director for review. Final approval on all contracts and work agreements must be approved by the Executive Director.

Internships – Program agreements with educational institutions providing for internships will be subject to the prior approval of the Executive Director.

Section: Employment
Policy: Emergency Closing
Policy No.: 318
Effective: 11/28/2006
Revised: 03/28/2023

318 – EMERGENCY CLOSINGS

At times, emergencies or extraordinary circumstances such as severe weather, fires, power failures, earthquakes, or health and safety reasons can disrupt company operations. In extreme cases, these circumstances may require the closing of a work facility which is approved by the Executive Director. In most cases, the pattern of the local school system will be followed. In the event the closing is for health and safety reasons, employees will be notified by the Program Director or the Executive Director.

When operations are officially closed due to emergency conditions, the time off for these closings will be paid and should be listed as other (emergency closing) on the time sheet. However, in these circumstances employees may be asked to work from home and should be prepared to perform duties as assigned by their supervisor. Supervisors may be required to verify performance.

In cases where an emergency closing is not authorized, employees who fail to report for work will not be paid for the time off and may receive disciplinary action.

Employees in essential operations may be asked to work on a day when operations are officially closed. In these circumstances, employees who work will receive regular pay.

Section: Employment
Policy: Business Travel/Expenses
Policy No.: 319
Effective: 04/27/2010
Revised: 10/27/2015

319 - BUSINESS TRAVEL/EXPENSES

Employees whose travel plans have been approved should make all travel arrangements through CCAA's Executive Assistant. It is the responsibility of the employee traveling to acquire all necessary signature approvals.

When approved, the actual costs of travel, lodging, and other expenses directly related to accomplishing business travel objectives will be reimbursed by CCAA. Meal per diem will be paid directly to the employee based on federal travel regulations. No receipts are required for this per diem.

Expenses that generally will be reimbursed include the following:

- Mileage costs for use of personal cars, only when less expensive transportation is not available. If personal car is utilized, beginning and ending odometer reading must be documented.
- Airfare or train fare for travel in coach or economy class or the lowest available fare.
- Car rental fees, only for compact or mid-sized cars.
- Fare for shuttle or airport bus service, where available; costs of public transportation for other ground travel.
- Taxi fare, only when there is no less expensive alternative.
- Cost of standard accommodations in low to mid-priced hotels, motels, or similar lodgings.
- Charges for telephone calls, fax, internet, and similar services required for business purposes.

Mileage to and from an employee's residence to the job site will not be reimbursed *unless it is not their usual job site and is an equal or shorter distance*. Employees will not be reimbursed for utilizing their personal vehicle when a company vehicle is available. CCAA's policy is to utilize company vehicles for company business unless it is impossible to do so due to a conflict of needing a vehicle when one is not available.

Employees who are involved in an accident while traveling on business must promptly report the incident to their immediate supervisor or Program Director. Vehicles owned, leased, or rented by CCAA may not be used for personal use without prior approval.

Cash advances to cover reasonable anticipated expenses may be made to employees after travel has been approved. When travel advances are given to employees, receipts must be submitted with the travel expense report within ten (10) days of returning from the trip. Employees should submit a written request to their supervisor when travel advances are needed. *Upon signing the Request for Travel Form, staff is authorizing CCAA to withhold any remaining balance of a travel advance or the entire amount if the receipts and report are not submitted by the due date. In addition, no future advances will be given to anyone who fails to follow these travel policies.*

With prior approval by the Executive Director, employees on business travel may be accompanied by a family member or friend, when the presence of a companion will not interfere with successful completion of business objectives. Generally, employees are also permitted to combine personal travel with business travel, as long as time away from work is approved. Additional expenses arising from such non-business travel are the responsibility of the employee.

When travel is completed, employees should submit completed travel expense reports within ten (10) days. Reports should be accompanied by receipts for all individual expenses (airline, shuttle, taxi, etc.) with the exception of the meal per diem.

Employees should contact their supervisor or Program Director for guidance and assistance on procedures related to travel arrangements, travel advances, expense reports, reimbursement for specific expenses, or any other business travel issues. Upon receipt of a complete and accurate travel report, accounting staff will utilize MapQuest or other available similar website to figure mileage based on the addresses provided to issue reimbursement for travel expense.

CCAA expenditures for transportation will be subject to funding agency policies and the Standardized Government Travel regulations. CCAA will abide by federal per diem rates as feasible, set by these policies. If a hotel in the higher rate is chosen, documentation will be maintained to justify the reason.

Abuse of this business travel expenses policy, including falsifying expense reports to reflect costs not incurred by the employee, can be grounds for disciplinary action, up to and including termination of employment.

Section: Employment
Policy: Security and Loss Prevention
Policy No.: 320
Effective: 08/26/2003
Revised: 10/27/2015

320 - SECURITY AND LOSS PREVENTION

Cornerstone Community Action Agency establishes the use and right to inspect all CCAA equipment and property. Agency operations often require others to have access to work areas, desks, files, or computers. There is no guarantee of privacy. Authorized individuals may have access and business needs to retrieve information on personal voice mail and e-mail.

Desks, lockers, and other storage devices may be provided for the convenience of employees but remains the sole property of CCAA. Accordingly, they, as well as any articles found within them, can be inspected by any agent or representative of CCAA at any time, with or without prior notice.

All passwords should be kept confidential. All equipment and property are here for business purposes and CCAA has the right to access and inspect them. Security concerns may warrant inspection of a facility and any personal property on the premises, including vehicles, purses, backpacks, lunch containers, and other items.

CCAA likewise does not tolerate theft or unauthorized possession of the property of employees, CCAA, visitors, and customers/clients. To facilitate enforcement of this policy, CCAA or its representative may inspect not only desks and lockers but also persons entering and/or leaving the premises and any packages or other belongings. Any employee who wishes to avoid inspection of any articles or materials should not bring such items onto CCAA premises.

Section: Employment
Policy: Attendance and Punctuality
Policy No.: 321
Effective: 11/28/2006
Revised: 09/28/2021

321- ATTENDANCE AND PUNCTUALITY

Cornerstone Community Action Agency understands occasions arise when an employee must be absent from work. At the same time, it is important for employees to understand that in order for CCAA to operate efficiently, regular attendance of all employees is imperative. Employees need to be present and accountable during their scheduled work time, and there are attendance expectations.

Employees may qualify for a leave of absence for their own major illness, the major illness of a family member, the birth or adoption of a child, workers' compensation injury, or military and/or National Guard duty. Having provided for these situations, it is important to remember that excessive absenteeism, tardiness, and/or leaving early causes the burden of filling in for the absent employee to fall on other employees within the organization. It is a requirement of each job that an employee report to work punctually and work all scheduled work hours as well as any required overtime.

In rare instances when employees cannot avoid being late to work or are unable to work as scheduled, they should call their supervisor 90 minutes before their scheduled start time for approval. Employees who are not on an approved leave of absence and are absent from, or tardy to work will be subject to disciplinary action.

If an employee is absent without approval, they will be considered to have resigned from their position. Any employee who does not return to work after the completion of approved leave will be considered to have resigned from their position. An employee who is chronically or excessively absent or tardy may be subject to disciplinary action up to and including suspension/termination.

Occasionally, an employee will exhibit a pattern of absenteeism that must be corrected despite having sufficient paid time off (PTO) to cover those absences (i.e., consistently missing a specific day of the week; the day before or after a holiday; the day before or after a scheduled vacation). Such cases will be reviewed with the immediate supervisor or Program Director before issuing any corrective action.

Occasionally, nonexempt employees may be permitted to make up missed time with the prior approval of their supervisor. The supervisor will determine the exact amount of time the employee will be allowed to make up in a workweek. Each supervisor must be consistent in allowing employees to make up time within the department. No employee will be permitted to work more than 40 hours during the workweek for the purpose of making up time.

Section: Employment
Policy: Return of Property
Policy No.: 322
Effective: 04/12/2010
Revised: 10/27/2015

322– RETURN OF PROPERTY

Employees are responsible for items issued to them by CCAA or in their possession or control, such as the following:

- Client lists
- Credit cards
- Equipment
- Keys
- Manuals
- Vehicles
- Written materials
- ID Badges

All CCAA property must be returned by employees on or before their last day of work. Where permitted by applicable laws, CCAA may withhold from the employee's check or final paycheck the cost of any items that are not returned when required. CCAA may also take any/all action deemed appropriate to recover or protect its property.

Section: Employment
Policy: Breaks & Meal Periods
Policy No.: 323
Effective:08/26/2003
Revised:10/27/2015

323 – BREAKS & MEAL PERIODS

Each workday, full-time and non-exempt employees **may be** provided with 2 rest periods of 15 minutes in length. To the extent possible, rest periods will be provided in the middle of work periods. Since this time is counted and paid as time worked, employees must not be absent from their workstations beyond the allotted rest period time and may not leave the premises.

All full-time non-exempt employees may be provided with one meal period varying from 30 to 60 minutes in length each workday. Amount of time taken by the employee for meal periods during the week will determine the time the employee may leave early from work on Friday. Supervisors will schedule meal periods to accommodate operating requirements. Employees will be relieved of all active responsibilities and restrictions during meal periods and will not be compensated for that time. An employee must have prior approval from their immediate supervisor to work through their lunch hour.

Section: Timekeeping/Payroll/Comp
Policy: Paydays
Policy No.: 400
Effective: 02/01/1995
Revised: 06/23/2020

400 - PAYDAYS

Cornerstone Community Action Agency work week is Sunday through Saturday. All employees are paid bi-weekly by the Friday following the end of the pay period. In the event that a regularly scheduled payday falls on a day off, such as a holiday, employees will be paid on the first day of work following the regularly scheduled payday.

Incomplete time sheets or time sheets not received by the appropriate time may lead to a delay in the employee receiving their direct deposit.

Payroll checks will be electronically deposited to an account at a financial institution that the employee designates. Employees will be able to access an itemized statement of wages through the payroll system when CCAA makes direct deposits. Employees are responsible for notifying the Accounting department of any change in banks or bank accounts to ensure the proper direct deposit of payroll to the employee's account. If a check ever has to be mailed to an employee the check will be mailed to the address on record. Employees are responsible for keeping their mailing address current.

Notify the Accounting department if a pay is not received. If the payment has not been negotiated, a duplicate payment will be issued to the employee, but the employee may be responsible for any stop payment charges assessed by the banking institution.

Employees are highly encouraged to use direct deposit or may visit with the CFO for alternative options.

Section: Timekeeping/Payroll/Comp
Policy: Payroll Advances
Policy No.: 401
Effective: 08/26/2003
Revised: 10/27/2015

401 - PAYROLL ADVANCES

Employee payroll advances will only be considered in extreme circumstances. These advances will be considered on a case-by-case basis. Before a payroll advance can be made, the approval of the Executive Director must be obtained. The amount of the pay advance will be limited to the number of hours the employee has worked (minus fringe benefits) through the date the advance was approved.

In the case of the Executive Director and payrolls advances, approval must be received by the Board Chair and Finance Committee.

Section: Timekeeping/Payroll/Comp
Policy: Payroll Deductions
Policy No.: 402
Effective: 08/26/2003
Revised: 06/21/2022

402 - PAYROLL DEDUCTIONS

Paycheck deductions are made from employee paychecks according to various laws and to pay for elected benefits, when necessary. Various federal and state laws require Cornerstone Community Action Agency to make deductions for federal, state, and local income taxes (if applicable) and payments, as well as social security. In addition, eligible employees may voluntarily authorize deductions from their paychecks to cover contributions to the pension plan, health insurance, etc.

Mandatory deductions and wage attachments that are required by law will automatically be made from all paychecks issued by CCAA. These deductions may change as they are affected by changes in the amount earned, by legislation, and by the number of dependents declared.

Additional deductions CCAA is authorized to make, or which are required by law (e.g., garnishments, child support) are automatically deducted and will not be stopped until proper documentation has been received. Court orders, wage deduction summonses, tax levies, and other similar orders against an employee should be immediately forwarded to the Accounting department. Human Resources will:

- Notify the employee of the legal action being taken against him/her.
- Provide the employee with a copy of the official court order or tax levy.
- Inform the employee of the dates the garnishment will be deducted from the employee's paycheck.
- Advise the employee of his/her rights under the Consumer Credit Protection Act (CCPA).

In the event that garnishment or similar proceedings are instituted against an employee, CCAA will deduct and remit the required amount from the employee's paycheck in accordance with CCPA guidelines.

An employee may not be terminated for having a garnishment served against him/her or for filing a petition for bankruptcy.

Section: Timekeeping/Payroll/Comp
Policy: Overtime
Policy No.: 403
Effective: 11/28/2006
Revised: 06/21/2022

403 - OVERTIME

All overtime work exceeding 30 minutes over the regularly scheduled work week must receive the Program Director's authorization prior to the employee working overtime. This approval must be in writing when possible. When emergency circumstances prevent prior written approval, employee shall send an email to the Program Director. Failure to follow the above process may be subject to disciplinary action up to and including possible termination of employment.

Overtime compensation is paid to all non-exempt employees in accordance with federal and state wage and hour restrictions. Overtime pay is based on actual hours worked. Time off on paid time off (PTO), or any leave of absence will not be considered hours worked for purposes of performing overtime calculations.

Employees who work overtime without receiving prior authorization from the Program Director may be subject to disciplinary action, up to and including possible termination of employment.

Exempt employees are not eligible to be paid overtime.

Section: Timekeeping/Payroll/Comp
Policy: Organization Classifications
Policy No.: 404
Effective: 02/01/1995
Revised: 12/21/2022

404 - ORGANIZATION CLASSIFICATIONS

The Fair Labor Standards Act requires all employees to be classified according to the overtime provisions of the law. For the purpose of paying any compensation, all employees are classified as either “Exempt” or “Nonexempt” from overtime compensation. It is the intent of Cornerstone Community Action Agency to clarify the definitions of employment classifications so that employees understand their employment status and benefit eligibility. These classifications do not guarantee employment for any specified period of time and the right to terminate the employment at will relationship at any time is retained by both the employee and CCAA

Human Resources is responsible for classifying all employees into one of the following categories for eligibility to receive certain benefits offered by CCAA Classification will be determined based on the FLSA criteria. All job descriptions will indicate whether the position is exempt or nonexempt. These categories are defined as:

- **Exempt Employee** – employees who are paid to do the job and must meet the DOL requirements for exemption; excluded from specific provisions of federal and state wage and hour laws; not eligible for overtime pay;
- **Nonexempt Employee** – employees who are paid on an hourly or salary basis; entitled to overtime pay for hours worked in excess of 40 in a work week;
- **Regular Full-Time** – an employee regularly scheduled to work at least 30 hours per week, may be exempt or nonexempt, and is not in a temporary status or introductory period. Regular full-time employees are eligible for all standard benefits, subject to the terms, conditions, and limitations of each benefit program.
- **Regular Part-Time** – an employee regularly scheduled to work less than 30 hours per week, and no more than 130 hours of service a month, except on occasion, may be exempt or nonexempt, and is not in a temporary status or introductory period. Regular part-time employees are eligible for some benefits sponsored by CCAA, subject to the terms, conditions, and limitations of each benefit program. While part-time employees may occasionally work 40 or more hours in a particular workweek, or in a series of workweeks, that by itself will not change their regular schedule. However, CCAA reserves the right to change the regular schedules of employees at any time. In such a case, CCAA will give affected employees as much advance notice as possible of their new regular schedules and will advise employees of the effect of such changes on their eligibility for company benefits. If a part time employee consistently (within 90 days) works 40 or more hours in a particular work week or more than 130 hours a month, their classification should be re-evaluated at that time.
- **Introductory Employee** – all exempt and nonexempt regular full-time and regular part-time employees are on an introductory period for 6 months of employment. At the end of 90 days, a written evaluation will be made by the employee’s immediate supervisor, based on satisfactory CCAA standards, for the purpose of determining the employee’s continued employment with the organization. Employees who satisfactorily complete the

introductory period will be placed in the regular employee category and will be notified of the change.

- **Seasonal Employee** – an employee hired or promoted as an interim replacement to supplement the work force or to assist in a specific project. Employment assignments in this category are of a limited duration. Seasonal employees retain that status until notified of a status change. Seasonal employees receive all legally required benefits (e.g., Workers' Compensation and Social Security), but are not eligible for any of CCAA's benefit programs with the exception of the retirement plan.
- **Temporary Employee** – an employee hired by a staffing agency to fulfill temporary work as identified by CCAA. The staffing agency will recruit, interview, and hire temporary employees as well as administer compensation on behalf of CCAA.

Nothing contained in the policy will impact the policy of employment at will.

Section: Timekeeping/Payroll/Comp
Policy: Time Reporting
Policy No.: 405
Effective: 02/01/1995
Revised:06/21/2022

405 - TIME REPORTING

Cornerstone Community Action Agency work week is Sunday through Saturday. Federal and state law and regulations require CCAA to maintain accurate records of all time worked by employees. Employees must record all time actually spent on the job performing assigned duties or other work-related projects in order to calculate employee pay and benefits. New employees will receive training during orientation on procedures time clocks.

All employees must clock in and out to record their daily hours worked, as well as the beginning and ending time of each meal period. They should also record the beginning and ending time of any split shift or departure from work for personal reasons or for approved time off. These time sheets are used to compute earnings and are kept as a permanent record. Each employee is responsible for accurate clocking of his/her time sheet.

Employees who are late to work should record the time they actually started work. Lateness may be reflected in paychecks. Excessive tardiness may be cause for disciplinary action (see Policy on Attendance).

Failure to do so may result in not receiving a check for time worked until the time sheets/activity report is received by accounting.

It is the employee's responsibility to clock in/out and review timesheet records to verify accuracy of all time worked/recorded. If corrections or modifications are made to the time record, both the employee and immediate supervisor must verify the accuracy of the changes.

Section: Timekeeping/Payroll/Comp
Policy: Administrative Pay Corrections
Policy No.: 406
Effective: 08/26/2003
Revised: 06/21/2022

406 – ADMINISTRATIVE PAY CORRECTIONS

Cornerstone Community Action Agency takes all reasonable steps to ensure that employees receive the correct amount of pay in each paycheck and that employees are paid promptly on the scheduled payday.

In the unlikely event that there is an error in the amount of pay, the employee should promptly bring the discrepancy to the attention of Human Resources so that corrections can be made as quickly as possible.

Section: Timekeeping/Payroll/Comp
Policy: Temporary Pay Increases
Policy No.: 407
Effective: 09/20/2016
Revised:

407 – TEMPORARY PAY INCREASES

Cornerstone Community Action Agency reserves the right to offer temporary pay increases to all eligible employees based on performance. Employee must understand that the reason for the increase would be due to fund availability and additional work load. The period of the increase, if any, will be determined by the Executive Director.

Section: Timekeeping/Payroll/Compensation
Policy: Travel Policy Nonexempt Employees
Policy No.: 408
Effective: 3/24/2020
Revised:

408 – TRAVEL POLICY NONEXEMPT EMPLOYEES

The purpose of this policy is to outline pay rules that apply to nonexempt employees when traveling on company business.

Employees in positions classified as nonexempt (overtime eligible) under the Fair Labor Standards Act may be eligible for compensation for the time they spend traveling. The compensation an employee receives depends on the kind of travel and whether the travel time takes place within normal work hours.

“Normal work hours,” for the purposes of this policy, are defined as an employee’s regularly scheduled work hours (e.g., 8:00 a.m. to 5:00 p.m.). This definition applies to normal workdays (Monday through Friday) and to weekends (Saturday and Sunday).

Employees with variable work hours will have their normal work hours defined by human resources prior to travel, based on a review of time records over the previous month.

“Travel time” is defined according to the type of travel involved:

Travel for a one-day assignment in another city: An employee who regularly works at a fixed location and is given a special one-day assignment in another city and returns home the same day will be paid for the time spent traveling to and from the other city, except for the time the employee would normally spend commuting to and from the regular worksite.

Travel during the workday: Time spent by an employee traveling as part of his or her regular job duties, such as travel from jobsite to jobsite during the workday, is work time and will be paid as such.

Travel away from home: Travel that keeps an employee away from home overnight is travel away from home. Travel time that takes place within normal work hours, regardless of the day of the week, is treated as work hours. When an employee travels between time zones, the time zone associated with the point of departure should be used to determine whether the travel falls within normal work hours. Time spent traveling from home to an airport terminal, except for the time the employee would normally spend commuting to and from the regular worksite, is treated as hours worked. Time spent waiting at a terminal until arrival at the destination is compensable.

If an employee requests a specific travel itinerary or mode of transportation that is different from the one authorized by the company, only the estimated travel time associated with the itinerary and mode of transportation that has been authorized will be eligible for compensation. For example, if an employee drives a car as a matter of personal preference when an authorized flight or other travel mode is available, and the travel time by car would exceed that of the authorized mode, only the estimated travel time associated with the authorized mode will be compensated.

Section: Timekeeping/Payroll/Comp
Policy: Merit Increase
Policy No.: 409
Effective: 8/25/2020
Revised:

409 – MERIT INCREASE

Purpose

Each year, the Executive Director and the CFO and HR Director will determine the pool of merit increase funds available. Both the objectives of the compensation program and financial resources available will be considered in the decision-making process.

Merit pay is used to reward successful performance. Larger merit increases will be awarded to employees who consistently exceed performance standards. Increases will not be granted to employees whose performance has been rated as unsatisfactory overall.

Procedures

Eligibility

To be eligible for a merit increase, an employee must be employed with at least six months of continuous service before the merit award date. An employee whose pay is at the maximum of the salary range may not be granted an increase that would cause the base salary to exceed the maximum of the range for that position.

Determination of merit increase

In accordance with Cornerstone Community Action Agency's guidelines, supervisors will recommend: a) whether an employee should receive any merit increase based on his or her annual performance review and b) the amount of increase appropriate for the performance results.

The following factors are the basis for awarding merit pay to employees:

- The employee's performance as reported in the annual performance review.
- The appropriate pay level within the range for the employee considering the employee's performance and performance of others in the range.
- Pay increase funds available.
- Recommendations of supervisors, as approved by Executive Director.

Review of merit increase

If funds are available, merit increases will require the recommendation of the employee's immediate supervisor and the approval of the HR Director. Employees are to be notified of their merit increase as soon as possible after all employee merit increases for the year have been approved by the HR director.

Performance reviews

Employee performance is to be formally reviewed at least once each year. The focus of the review is to discuss the employee's performance, review standards and expectations for the position, set goals and professional development for the next year, and communicate the amount of the employee's merit increase if applicable.

Section: Timekeeping/Payroll/Compensation
Policy: Additional Pay
Policy No.: 410
Effective: 09/28/2021
Revised:

410 – ADDITIONAL PAY

Purpose

From time to time, certain employees in certain situations may be entitled to additional pay for reasons such as working in conditions considered hazardous, being asked to go far above and beyond their assigned duties, being eligible for programmatic stipends, or other reasons as set forth by leadership, governance, and/or funding sources.

When additional pay can be given

Additional pay such as hazard pay, stipends, or pay for other reasons may be provided when it is part of an assigned funding source, used for an assigned project, and/or part of an approved program budget.

Who is eligible for additional pay

Employees receiving additional pay must be current full-time, part-time, or temporary employees and must have been an employee of the agency and allocated to the assigned program for a period of at least 30 days.

Employees must be able to show that they completed the tasks which triggered the additional pay.

Additional pay is income

Additional pay is not part of the employee's regular normal compensation but is taxable income and will be reported with the employee's total annual compensation.

Additional pay is time or event specific

Additional pay eligibility must have specific beginning and ending dates or must be tied to a specific event which entitles the employee to be eligible for such pay.

Procedure for additional pay

1. The payment of additional pay is intended to be temporary or event specific and should not exceed the designated time frame which entitled the employee to said pay. In no instance shall any time-based additional pay extend beyond a single program budget year for the identified program. Any additional pay to which an employee is entitled which extends beyond a program year, a separate payment must be approved.
2. Additional pay is never salary-based. It is based on the funding source project description, the tasks which made the employee eligible, the amount of time, effort, and/or success documented in the project, the hierarchy of those involved, and the approved budget for additional pay.
3. Additional pay will have the appropriate Federal and State Taxes (if required) removed at the time of the payment, according to applicable law.

4. Additional pay is paid through the payroll department and must remain consistent with all payroll policies and procedures.

Section: Benefits
Policy: Employee Benefits
Policy No.: 500
Effective: 08/28/2007
Revised: 06/21/2022

500 – EMPLOYEE BENEFITS

Benefits eligibility is dependent upon a variety of factors, including employee classification. The following benefit programs are available to eligible employees who work 30 or more hours per week:

- Health Insurance – After 60 days of employment, regular full-time and regular part-time employees working 30 hours or more per week become eligible for health insurance. A Summary Plan Description and information on cost of coverage will be provided to eligible employees in advance of enrollment.
- 403(b) Thrift Plan (Retirement Plan) – Upon employment, regular full-time and regular part-time employees will become eligible to participate in the employee retirement plan. An employee must be 18 years of age or older to participate in the 403(b) Thrift Plan. A SPD and information will be provided to eligible employees in advance of enrollment.

Some benefit programs require contributions from the employee.

Temporary or seasonal full-time or part-time employees are not eligible for benefits unless they meet the eligibility requirements for the 403(b) Retirement Plan.

Employee contributions will be deducted from their paychecks on a pre-tax basis. Employees will pay no Federal or Social Security taxes on this amount.

Contact CCAA's Human Resource Department for more information regarding employee benefits. More detailed information about each plan can be found in the plan documents maintained in HR and the summary plan descriptions (SPDs). SPDs are the official documents regarding employee benefit plans and supersede all references to employee benefits in this manual.

Section: Benefits
Policy: Paid Time Off (PTO)
Policy No.: 501
Effective: 10/01/2018
Revised: 12/16/21

501 – PAID TIME OFF (PTO)

Paid Time Off (PTO) is available to eligible employees. Employees in the following employment classifications are eligible to earn and use PTO as described in this policy:

- Regular full-time employees
- Regular part-time employees

Once employees enter an eligible employment classification, they begin to earn PTO according to the schedule. However, before PTO can be used, a waiting period of sixty (60) days must be completed. At the beginning of the month after the employee has worked 60 days, employees can request use of earned PTO including that accrued during the waiting period.

The amount of PTO employees earn is shown in the following schedule:

- All non-classroom staff can earn up to 2 PTO days per month, 24 per calendar year.
- All 10-month essential to classrooms staff can earn up to 20 PTO days per calendar year. Ten (10) of these days will be built into the calendar to use during Thanksgiving, Christmas and Spring Break and will be effective at the start of employment. This will leave the employee to earn pay period accruals of up to 10 PTO days per calendar year to use as needed with prior approval.
- All 12-month essential to classrooms staff can earn up to 24 PTO days per calendar year. Fourteen (14) of these days will be built into the calendar to use during Thanksgiving, Christmas, Spring Break and Summer Break and will be effective at the start of employment. This will leave the employee to earn pay period accruals of up to 10 PTO days per calendar year to use as needed with prior approval.

Non-exempt employees can use PTO in increments. Exempt employees will have full days deducted from their accrued leave balance. To take PTO, employees should request advance approval from their supervisors. Requests will be reviewed based on a number of factors, including business needs and staffing requirements. PTO is paid at the employee's base pay rate at the time of leave. It does not include overtime or any special forms of compensation such as incentives. If a holiday falls within an employee's leave, the employee will not be charged with PTO for the holiday but will be paid for the holiday at the appropriate holiday rate.

Salaries and fringe benefits can be paid for out of funding sources under unexpected or extraordinary circumstances such as an epidemic, pandemic, disaster, or state of emergency.

Progressive disciplinary action relative to incidents of unpaid leave:

--One - three incidents: No disciplinary action, Supervisory coaching.

--Fourth incident: Written warning in the employee's file

--Fifth incident: Will be subject to disciplinary action, up to and including suspension/termination

Unused PTO benefits will be allowed to accumulate until the regular employee has accrued a total of 30 days of PTO benefits. Unused PTO benefits will be allowed to accumulate at a percentage of the full-time rate based on the number of hours worked for all regular part-time employees. Upon one (1) year of employment, written formal resignation with 2-week notice/permanent lay-off of employment, employees will be paid for their available PTO balance, but not exceeding 80 (hours).

Section: Timekeeping/Payroll/Compensation
Policy: Holidays
Policy No.: 503
Effective: 02/01/1995
Revised: 06/21/2022

503 -HOLIDAYS

Holidays are recognized as non-work days for employees. Cornerstone Community Action Agency will recognize the following days as paid holidays for eligible employees:

- New Year's Day
- Martin Luther King, Jr. Day (third Monday in January)
- Presidents Day (third Monday in February)
- Good Friday (Friday before Easter)
- Memorial Day (last Monday in May)
- Juneteenth (June 19)
- Independence Day (July 4)
- Labor Day (first Monday in September)
- Columbus Day (second Monday in October)
- Thanksgiving Day (fourth Wednesday through fourth Friday in November)
- Christmas Day (The day before through the day after)

CCAA will grant paid holiday time off to all eligible employees. Holiday pay will be calculated based on the employee's straight-time pay rate (as of the date of the holiday) times the number of hours the employee would otherwise have worked on that day. Eligible employee classifications are:

- Regular full-time employees
- Regular part-time employees
- Introductory employees

To be eligible for holiday pay, employees must work the last scheduled day immediately preceding and the first scheduled day immediately following the holiday. Exception is made if the employee has prior written approval for vacation time off, prior written approval for doctor's appointment, or a doctor's note is provided upon returning to work.

A recognized holiday that falls on Saturday will be observed on the preceding Friday. A recognized holiday that falls on Sunday will be observed on the following Monday. If a recognized holiday falls during an eligible employee's paid absence (such as vacation or sick leave), holiday pay will be provided instead of the paid time off benefit that would have otherwise applied. If eligible non-exempt employees work any amount of time on a recognized holiday, they will receive their regular rate of pay times the amount of time worked and will be given another day off. However, prior approval must be obtained before working a holiday. Paid time off for holidays will not be counted as hours worked for the purposes of determining overtime.

The Executive Director may, on special occasions and consistent with religious and local business practices, excuse a staff member from work or declare a holiday for all employees.

Section: Benefits
Policy: Other Unpaid Leave
Policy No.: 504
Effective: 11/28/2006
Revised: 10/27/2015

504 – OTHER UNPAID LEAVE

Each employee is hired because he/she are needed for the functioning of the programs and the delivery of services to clients, families. Regular job attendance is required. However, there are times that an employee needs time away from the job. These are provided through holidays, paid time off (PTO), and personal leave of absence. All of these benefits reward the employee for his/her service.

In the rare case when an employee has a compelling reason to be absent and has no available leave, the Executive Director may, at his/her discretion, approve unpaid leave. This approval must be obtained **prior** to the absence. Factors in determining approval will include the prior absences of the employee and current work load.

Unpaid leave for emergencies or personal needs will be considered for each employee on an individual basis. Each employee must use all his/her earned unused vacation time before any unpaid leave is authorized. If an unpaid leave of absence is granted, it is done so solely at the discretion of the Executive Director. A written notice shall be provided by the requesting employee stating the date the time off will begin and the date that he/she is expected to return to work. The employee's benefits will continue during this time unless it exceeds the approved time off.

If unpaid leave is not granted and the employee fails to report to work, the employee will be terminated.

Section: Benefits
Policy: Family and Medical Leave
Policy No.: 506
Effective: 02/01/1995
Revised: 06/21/2022

506 - FAMILY AND MEDICAL LEAVE

It is the policy of Cornerstone Community Action Agency to provide leaves in compliance with Federal FMLA. CCAA will comply with Federal FMLA laws in accordance with the requirements staff size in order to offer FMLA. To find out if you qualify for FMLA, contact CCAA's Human Resource Department.

Section: Benefits
Policy: Military / Reserve Leave
Policy No.: 507
Effective: 02/01/1995
Revised: 10/27/2015

507 - MILITARY / RESERVE LEAVE

It is the policy of Cornerstone Community Action Agency to comply with all applicable statutes that require reservists and National Guard personnel to be given leave of absence for active duty and training exercises under Uniformed Services Employment and Reemployment Rights Act (USERRA) of 1994.

As with any leave of absence, employees must provide advance notice to their supervisor of their intent to take a military leave and must provide appropriate documentation unless giving such notice is impossible, unreasonable, or precluded by military necessity.

Employees will receive partial pay for two-week training assignments and shorter absences. Upon presentation of satisfactory military pay verification data, employees will be paid the difference between their normal base compensation and the pay (excluding expense pay) received while on military duty. The portion of any military leaves of absence in excess of two weeks will be unpaid, however, employees may request to use any available paid time off for the absence.

Continuation of health insurance benefits is available as required by USERRA based on the length of the leave and subject to the terms, conditions and limitations of the applicable plans for which the employee is otherwise eligible. Paid time off (PTO) and holiday benefits will continue to accrue during a military leave of absence.

Employees on military leave for up to 30 days are required to return to work for the first regularly scheduled shift after the end of service, allowing reasonable travel time. Employees on longer military leave must apply for reinstatement in accordance with USERRA and all applicable state laws.

Upon return from military leave, employees will be reinstated with the same seniority, pay, status, and benefit rights that they would have had if they had worked continuously. For leaves of more than 180 days, employees must apply for reemployment within ninety (90) days of discharge from the military. For leaves of 31 to 180 days, employees must apply for reemployment within fourteen (14) days of discharge. For leaves of less than 31 days, employees must apply for reemployment the next full workday plus 8 hours for safe travel. Employees who fail to report for work within the prescribed time after completion of military service will be considered to have voluntarily terminated their employment.

If employees are reservists in any branch of the Armed Forces or members of the National Guard, they will be granted time off for military training. Such time off will not be considered paid time off (PTO). However, employees may elect to have their reserve duty period be considered as paid time off (PTO) to the extent they have such time available.

Section: Benefits
Policy: Jury Duty / Witness Service
Policy No.: 508
Effective: 02/01/1995
Revised: 10/27/2015

508 - JURY DUTY / WITNESS SERVICE

Cornerstone Community Action Agency encourages employees to fulfill their civic responsibilities by serving on a jury or to testify as a witness when subpoenaed to do so. Employees in an eligible classification may request up to two (2) weeks of paid jury/witness duty leave over any two (2) year period.

Employees must present any summons to their supervisor on the first working day after receiving the notice. If an employee is not required to serve on a day he/she is normally scheduled to work or if the employee is excused before serving jury duty, he/she is expected to report to work. Employees are expected to report for work whenever the court schedule permits.

Jury duty/witness duty pay will be calculated on the employee's base pay rate times the number of hours the employee would otherwise have worked on the day of absence. If employees are required to serve jury/witness duty beyond the period of paid jury/witness duty leave, they may use any available paid time off (PTO), or may request an unpaid jury/witness duty leave of absence. Employees may keep any compensation they are paid for jury duty or witness service. If employees have been subpoenaed or otherwise requested to testify as witnesses by CCAA, or in their regular line of duty, they will receive paid time off (PTO) for the entire period of witness duty. Jury/witness duty pay is not used in the calculation of overtime.

CCAA will continue to provide health insurance benefits for the full term of the jury/witness duty leave. Paid time off (PTO), and holiday benefits will continue to accrue during paid or unpaid jury/witness leave.

Section: Benefits
Policy: Time Off To Vote
Policy No.: 509
Effective: 08/26/2003
Revised: 10/27/2015

509 - TIME OFF TO VOTE

Cornerstone Community Action Agency encourages its employees to participate in the election of government leaders. Therefore, if an employee does not have sufficient time outside regular work hours to vote, CCAA will grant up to two (2) hours of paid time off to vote.

If possible, employees should make their requests at least two working days prior to the Election Day. Advance notice is required so that the necessary time off can be scheduled at the beginning or end of the work shift, whichever provides the least disruption to the normal work schedule.

Employees may wish to inquire of their registrar of voters about the possibility of voting early or by absentee ballot. Every effort should be made to vote either before or after the employee's normal workday. Employees must submit a voter's receipt on the first working day following the election to qualify for paid time off.

Section: Benefits
Policy: Bereavement Leave
Policy No.: 510
Effective: 01/24/2012
Revised: 06/21/2022

510 - BEREAVEMENT LEAVE

Cornerstone Community Action Agency will provide up to three (3) days of paid bereavement leave to eligible employees due to the death of an immediate family member. Employees must complete three (3) months of employment for leave to be paid. If employees need time in excess of three days, they may request a leave of absence or use accrued paid time off (PTO) with the approval of their supervisor.

Immediate family shall be defined as spouse, child, stepchild, father, mother, stepparents, brother, sister, step-relative, grandmother, grandfather, grandchild, father-in-law, mother-in-law, brother-in-law, or sister-in-law.

Bereavement pay is calculated based on the employee's rate of pay at the time of the absence and the number of hours they would have been scheduled to work. Bereavement pay is not used in the calculation of overtime. Bereavement leave will not be paid for Saturday or Sunday or any day on which paid time off is paid. Employees will continue to accrue paid time off (PTO) during the bereavement leave. Time off without pay, or PTO days may be granted to attend the funerals of other close relatives or friends upon approval by the employee's supervisor.

To be eligible for the excused absence and pay provisions of this policy, employees are to request bereavement leave through their supervisor as soon as possible.

Eligible employees are classified as:

- Regular full-time employees
- Regular part-time employees
- Introductory employees

Section: Benefits
Policy: Continuation of Health Plan Coverage's - COBRA
Policy No.: 511
Effective: 08/26/2003
Revised: 06/21/2022

511 - CONTINUATION OF HEALTH PLAN COVERAGES

Under "COBRA" (Public Law 99-272, Title X), Cornerstone Community Action Agency will offer employees and their families the opportunity for a temporary extension of health coverage (called "continuation coverage") at group rates in certain instances where coverage under the health plans would otherwise end. Persons eligible to continue coverage under COBRA are known as "qualified beneficiaries," and the events that trigger continuation of coverage are known as "qualifying events." The Human Resources Department will provide written notice of continued health insurance to the terminated employee and/or dependents.

If an employee is covered by any of CCAA's group health plans, the employee has the right to elect continuation coverage under those plans if the employee loses group health coverage as a result of either of the following qualifying events:

- Reduction in the employee's hours of employment, or
- Termination of the employee's employment for reasons other than gross misconduct.

If an employee's spouse is covered by any of CCAA's group health plans, the spouse has the right to elect continuation of coverage under those plans if the spouse loses group health coverage as a result of any of the following qualifying events:

- Death of the employee;
- Termination of the employee's employment (for reasons other than gross misconduct) or reduction in the employee's hours of employment;
- Divorce or legal separation from the employee; or
- Employee becomes entitled to Medicare.

If a dependent child of an employee is covered by CCAA's group health plans, the child has the right to elect continuation of coverage under those plans if the child loses group health coverage as a result of any of the following qualifying events:

- Death of the employee;
- Termination of the employee's employment (for reasons other than gross misconduct) or reduction in the employee's hours of employment with CCAA;
- Employee's divorce or legal separation;
- Employee becomes entitled to Medicare; or
- Child ceases to be a "dependent child" under the CCAA's group health plan.

The qualified beneficiary is responsible for informing CCAA of a divorce, legal separation, or a child losing dependent status within sixty (60) days of the date of the later of the qualifying event or the date on which coverage would end under the plan because of the event. If CCAA does not receive notice within that sixty (60) day period, the qualified beneficiary is not entitled to elect continuation of coverage. CCAA is responsible for notifying qualified beneficiaries of their right

to elect continuation of coverage as a result of the employee's death, termination of employment, reduction in hours, or Medicare entitlement.

Once qualified beneficiaries receive notice of their right to elect continuation of coverage, the qualified beneficiaries have sixty (60) days from the later of the date they are provided notice or the date they lose coverage to inform CCAA they want to continue their group health coverage under COBRA. If the qualified beneficiaries do not elect continuation of coverage by the end of the sixty (60) day period, they forfeit their right to elect that coverage.

Continuation coverage will be cancelled for the following reasons:

- CCAA no longer provides group health coverage to any of its employees;
- A COBRA premium is not paid on time;
- Qualified beneficiary becomes covered, after the date of COBRA election, under another group health plan, which does not exclude or limit coverage for the qualified beneficiary's preexisting conditions;
- Qualified beneficiary becomes entitled to Medicare after the date of the COBRA election; or
- Qualified beneficiary is no longer determined to be disabled, where coverage was extended because of disability beyond eighteen (18 months).

Continuation of coverage under COBRA is not effective until the qualified beneficiary elects coverage, but, once elected, the coverage is retroactive to the date of the qualifying event. Qualifying beneficiaries do not have to show that they are insurable to choose continuation coverage, but they must be eligible for such coverage. CCAA reserves the right to retroactively terminate COBRA coverage if an individual is determined to be ineligible.

If the qualified beneficiary is a covered former employee, he/she may add newborn or adopted child(ren) to his/her continuation coverage, provided the child(ren) are added within thirty (30) days of the birth or adoption and the additional premium is paid. These children that are added will be considered qualified beneficiaries under the law.

Qualified beneficiaries must pay the designated premiums for their continuation coverage in a timely fashion. Qualified beneficiaries have forty-five (45) days from the date they elect continuation coverage to pay the initial COBRA premium. Continuation coverage does not start until the date the individual chooses continuation coverage. Thereafter, he/she will have a grace period of thirty (30) days to pay any subsequent premiums.

At the end of the COBRA continuation period, qualified beneficiaries may be allowed to convert their group to an individual policy if such an option is available.

Section: Benefits
Policy: Workers Compensation
Policy No.: 514
Effective: 02/01/1995
Revised: 06/21/2022

514 - WORKERS' COMPENSATION

Injuries occurring in the course of employment are paid for by workers' compensation insurance. Workers' compensation insurance pays all medical costs, without a deductible provision, and is paid for exclusively by Cornerstone Community Action Agency. There are well-defined provisions that must be met to ensure that employees qualify for workers' compensation benefits.

Any work-related injury or illness must be immediately reported in writing to immediate supervisor. The workers' compensation insurer will investigate all late reported claims. Where facts cannot be verified, the claim will be denied. Any claim for an injury or illness caused by an employee's willful misconduct, alcohol or drug usage, or that occurs during the employee's voluntary participation in any off-duty recreational, social, or athletic activity sponsored by CCAA will not be compensable. Workers' compensation fraud is a felony, punishable by fines and/or jail time. The organization will prosecute any individual found to be claiming a work-related illness or injury fraudulently.

An approved physician in the Workers' Compensation network must treat the injured employee. Any treatment other than that approved by the Workers' Compensation carrier will not be compensable. There are two types of workers' compensation benefits paid to an employee with a work-related injury or illness. These are medical and wage replacement benefits.

Medical benefits include the following:

- Physician's Fees (or health care provider fees) - The approved physician (or health care provider) who provides treatment is paid through the workers' compensation insurer;
- Hospital Fees - Paid in full;
- Pharmacy Costs - Paid in full if prescribed by an approved physician; and
- Special Costs - Any other medical costs including but not limited to braces, crutches, physical therapy, and rehabilitation therapy, if deemed necessary by an approved physician (or health care provider), will be paid in full according to state law.

Wage replacement benefits are paid during the time employees are temporarily disabled because of a work-related injury or illness. Employees receive a percentage of their salary as set by state law.

The workers' compensation laws provide for a waiting period (which may differ in every state) before injured employees become eligible for wage replacement benefits. Employees will be covered for the period of disability to the limit allowed under the state workers' compensation law. The workers' compensation insurer will pay the employee. The check will be mailed to the employee's home address.

Employees who decline temporary modified duty in order to return to work from a leave of absence due to a workers' compensation injury will be considered to have resigned and will be terminated. If employees are eligible for family and medical leave

because of the employees' personal health condition, they will have their workers' compensation benefits terminated if they refuse temporary modified duty for which the employee is qualified.

Any employee who fails to return to work after being released by an approved physician will be considered to have resigned their position.

Section: Safety
Policy: Injury / Illness On-The-Job
Policy No.: 600
Effective: 03/27/2012
Revised: 06/21/2022

600 - INJURY / ILLNESS ON THE JOB

Any employee reporting an on-the-job injury or illness will receive immediate and appropriate medical treatment. All applicable federal, state, and local laws or regulations pertaining to occupational injuries or illnesses will be followed and complied with at all times.

It is the responsibility of all employees to report, immediately in writing to their supervisor, all on-the-job injuries or illnesses regardless of how insignificant or minor the injury or illness may appear at the time. Incident Report Forms are provided for this purpose and may be obtained from Human Resources. These reports should be returned to Human Resources once completed. Failure to report an injury or illness as required by state law and organization policy could result in loss of compensation benefits, and possibly lead to corrective action up to and including termination.

When employees sustain an injury or illness that requires outside medical treatment, the employees will be subject to completing a screening for the presence of drugs and/or alcohol in their system. When employees are involved in a mobile equipment accident, the employees will notify their immediate supervisor or Program Director at that time. Employees may be subject to completing a screening for the presence of drugs and/or alcohol in their system. Any employee who refuses screening for the presence of drugs and/or alcohol will be subject to immediate termination.

In the event the injury is of the nature that requires outside medical treatment, employees will complete all necessary paperwork and forward to Human Resources. In case of an emergency, the employee should immediately go to the nearest hospital/clinic for treatment and then notify Human Resources within 24 hours if possible. If subsequent medical visits are necessary, employees should schedule those during non- work hours if possible, or as late in the afternoon as possible. Employees should clock out if the appointment is during their regular work shift.

Section: Safety
Policy: Temporary Modified Job Duty
Policy No.: 601
Effective: 03/27/2012
Revised: 06/21/2022

601 - TEMPORARY MODIFIED JOB DUTY

Cornerstone Community Action Agency is committed to providing work, when possible, for employees who have been restricted by a physician or a health care provider due to a non-work-related injury or illness. Such work will be provided subject to availability. Work will be assigned according to the nature of the injury or illness and the limitations set forth by the treating physician or health care provider. Every effort will be made to place employees in positions within their own departments. If necessary, an employee will be placed wherever an appropriate position is available.

While on temporary modified duty, employees will continue to receive their regular rate of pay. Employees on temporary modified duty must furnish a written update of their medical condition to Human Resources from the treating physician or health care provider after each visit in order to remain in the reassigned job. Temporary modified-duty assignments are limited to a period of 90 days, subject to review. Being placed on a temporary modified-duty assignment does not excuse an employee from following all rules and regulations.

Section: Safety
Policy: Workplace Safety
Policy No.: 602
Effective: 03/27/2012
Revised: 10/27/2015

602 - WORKPLACE SAFETY

To provide employees with a safe place to work, Cornerstone Community Action Agency operates as safely as possible in accordance with the Occupational Safety and Health Administration (OSHA) and other applicable federal and state laws and regulations.

Each employee, as a condition of continuing employment, is required to work safely, to observe all safety rules and regulations, to wear required safety equipment, and to perform his/her job in a manner to avoid accidents and injury to others.

CCAA locations will maintain readily available, well-supplied first aid kits accessible to staff members at all times.

Section: Safety
Policy: Fraternalization
Policy No.: 603
Effective: 06/13/2018
Revised: 06/13/2018

603 – FRATERNIZATION

Our Fraternalization policy outlines our guidelines on employees forming personal relationships with each other, and or clients.

We don't want to place undue restrictions on employees dating colleagues, as we acknowledge that freedom of choosing one's partner is an individual's right. But, without rules and guidelines, romantic relationships between colleagues, and clients may negatively impact our workplace. This policy will set restrictions to maintain workplace conduct and order.

Friendships forming between employees are also included in this policy. Friendships allow for a more collaborative environment, but they might also occasionally create cliques and fragmentation inside departments.

This policy does not restrict participating in labor unions or other labor or civil rights organizations. When two employees are in a relationship with one another, they should behave appropriately in the workplace. We define unacceptable behavior as any action that:

Offends our people.

- Disrupts or hinders our operations.
- Distracts our employees from their duties.
- Decreases our employees' individual performance. Examples of acceptable behavior for employees are:
 - Passing by their partner's office to talk to them for non-work reasons for a short time.
 - Displaying affection discreetly and infrequently while on company premises.
 - Discussing their plans as a couple during breaks or lunch hours (with or without colleagues.)
 - Coming to and leaving from work together.

Examples of unacceptable behavior for employees are:

- Arguing in the workplace during or after working hours.
- Kissing or touching inappropriately in front of colleagues.
- Exchanging an excessive number of instant messages or calls unrelated to their work during working hours.
- Making their colleagues uncomfortable by talking or boasting about the relationship during working hours.

Employees who exhibit unacceptable behavior will face progressive discipline, up to and including termination in cases of repeated violations. HR is responsible for determining appropriate penalties.

Employees are also obliged to behave appropriately towards their colleagues who date each other. We prohibit victimization and hostility towards employees for any reason. This includes sexual jokes, gossip and improper comments. Employees who witness this kind of behavior should report it to HR.

Section: Safety
Policy: Dealing With Difficult Clients
Policy No.: 604
Effective: 06/13/2018
Revised: 06/13/2018

604 – DEALING WITH DIFFICULT CLIENTS POLICY

Client Satisfaction is one of Cornerstone Community Action Agency values however, at times, a client's demands or expectations may exceed the agency's ability to deliver.

As a general rule, when a person approaches the agency with a request, application, concern or complaint they first need to be heard, understood and respected.

Clients have a right to:

- be given apology if required;
- be given information or an explanation;
- have action taken to address their concerns or fix their problem; and
- have the matter dealt with quickly, fairly and properly

Clients who cannot be satisfied include members of the public or groups who do not accept that the agency is unable to assist them, provide and further assistance or level of service than has been provided already and/or disagree with the action the agency has taken in relation to their complaint or concern.

If in the opinion of the Executive Director a client cannot be satisfied and all appropriate avenues of internal review or appeal have been exhausted and the client continues to write, telephone, email and/or disagree with the action the agency has taken:

- The Executive Director may write the client restating the agencies position on the matter if necessary and advising that if the client continues to contact the agency regarding the matter, the agency may:
 - not accept and further phone calls from the client;
 - not grant and further interviews;
 - require all further communication to be put in writing; and
 - continue to receive, read and file correspondence but only acknowledge or otherwise respond to it if:
 - the client provides significant new information relation to their complaint or concern; or
 - the client raises new issues which the Executive Director's opinion warrant fresh action.
- The Executive Director shall advise the Board of Directors of a person who is deemed to be "a client who cannot be satisfied", the client's concerns.

Cornerstone Community Action Agency will not tolerate or condone intimidating or offensive behavior toward staff members by members of the public under any circumstances. Any staff member who is the victim of such behavior may, at their own discretion, report the matter to their Executive Director and the Police for further action.

Rude, abusive or aggressive behavior may include rude or otherwise vulgar noises, expressions or gestures, verbal abuse of a personal or general nature, threatening or offensive behavior, physical violence against property or physical violence against a person.

If in the opinion of any staff member rude, abusive or aggressive comments or statements are made in telephone conversations or in person, the staff member may:

- warn the caller that if the behavior continues the conversation or interview/meeting will be terminated;
- terminate the conversation or interview/meeting if the rude, abusive or aggressive behavior continues after a warning has been given.

Where a conversation or interview/meeting is terminated, the staff member must notify their immediate Director of the details as soon as possible.

If in the opinion of the Executive Director any correspondence to the agency contains personal abuse, inflammatory statements or materials clearly intended to intimidate, it will be returned to the sender and not otherwise acted upon.

Violence, damage to property or threatening behavior may be reported to the police, depending on the severity of the actions.

Section: Safety
Policy: Video Surveillance System
Policy No.: 605
Effective: 11/25/19
Revised: 06/21/2022

605 – VIDEO SURVEILLANCE SYSTEM

PURPOSE

Cornerstone Community Action Agency (CCAA) makes use of both video and audio surveillance for the purpose of enhancing workplace safety and security and allows for the after-the-fact investigation of reported incidents. Our goals are to promote and foster a safe and secure environment for children, staff, visitors, and to diminish the potential for personal and organizational loss or destruction of property.

GENERAL PROTOCOLS

Signage will be posted at building locations that notify all who enter of CCAA's use of security cameras. **CAMERA PLACEMENT**

Cameras are installed in public places and classrooms. Public places include entrances, exits, playgrounds, offices, corridors, and large gathering places. Cameras will not be used where there is a reasonable expectation of privacy, including but not limited to restrooms, private offices, or locker rooms.

VIDEO SURVEILLANCE RECORDING

All video surveillance cameras are capable of recording continuously by a digital video recording system. Recorded video is used exclusively for the investigation of security and safety incidents.

VIEWING AND MONITORING

Monitoring of recorded video will be limited, except in the case of a suspected emergency or safety concern. Reviewing the recordings will occur only when a suspected incident is committed inside or outside the building.

Viewing the video is to be performed by authorized personnel that have been expressly designated by the Executive Director.

Requests for video viewing or video recordings from those other than the Executive Director or designee will not be accommodated.

Surveillance system misuse shall be addressed on a case-by-case basis to the Director of Infrastructure. **LIMITED ACCESS TO RECORDINGS**

Any video recordings used for security purposes in buildings or grounds are the sole property of Cornerstone Community Action Agency. Release of such videos will be made available only with the permission of the Executive Director or designee. Law enforcement officials shall be granted access to video recordings after giving prior notice and required documentation to the Executive Director or designee.

VIDEO STORAGE

Recorded video is generally stored for a period of thirty days, unless being used in an ongoing investigation. In some instances, some video footage can be converted into a permanent video clip and stored for the duration of an investigation.

MANAGEMENT OF VIDEO SURVEILLANCE SYSTEM

Cornerstone Community Action Agency's Director of Infrastructure is responsible for the management of all video surveillance systems used. No other departments shall repair/replace or install video surveillance systems without the knowledge of the Director of Infrastructure.

Section: Safety
Policy: Data Breach
Policy No.: 606
Effective: 11/25/19
Revised:

606 – DATA BREACH

1. Overview - Data breaches are increasingly common occurrences whether caused through human error or malicious intent. Cornerstone Community Action Agency operations rely on the proper use of Confidential Information and Personally Identifiable Information (PII) on a daily basis. Managing risk and responding in an organized way to Incidents and Breaches is key to operations.
2. Purpose - Cornerstone Community Action Agency must have a robust and systematic process for responding to reported data security Incidents and Breaches. This policy is designed to standardize the Cornerstone Community Action Agency-wide response to any reported Breach or Incident, and ensure that they are appropriately logged and managed in accordance with best practice guidelines. Standardized processes and procedures help to ensure Cornerstone Community Action Agency can act responsibly, respond effectively, and protect its information assets to the extent possible.
3. Scope - This policy applies to all Cornerstone Community Action Agency staff.
4. Policy

GENERAL INFORMATION

A “Data Security Incident” or “Incident” shall mean an accidental or deliberate event that results in or constitutes an imminent threat of the unauthorized access, loss, disclosure, modification, disruption, or destruction of communication or information resources of Cornerstone Community Action Agency

Common examples of data security Incidents include, but are not limited to, any of the following:

- Successful attempts to gain unauthorized access to a Cornerstone Community Action Agency system PII regardless of where such information is located
- Unwanted disruption or denial of service
- The unauthorized use of a Cornerstone Community Action Agency system for the processing or storage of Confidential Information or PII
- Changes to Cornerstone Community Action Agency system hardware, firmware, or software characteristics without the Cornerstone Community Action Agency’s knowledge, instruction, or consent
- Loss or theft of equipment where Confidential Information or PII is stored

- Unforeseen circumstances such as a fire or flood that could lead to the loss or misuse of Confidential Information or PII
- Human error involving the loss or mistaken transmission of Confidential Information or PII
- Hacking, social engineering, phishing or other subversive attacks where information is obtained by deceitful practice

A “Data Security Breach” or “Breach” is any Incident where Cornerstone Community Action Agency cannot put in place controls or take action to reasonably prevent the misuse of Confidential Information or PII. A Breach is also an Incident where data has been misused.

Adopting a standardized and consistent approach to Incident management shall ensure that:

- Incidents are reported in a timely manner and can be properly investigated
- Incidents are handled by appropriately authorized and skilled personnel
- Appropriate levels of management are involved in response management
- Incidents are recorded and documented
- Organizational impacts are understood and action is taken to prevent further damage
- Evidence is gathered, recorded, and maintained in a form that will withstand internal and external scrutiny
- External agencies, customers, and data users are informed as required
- Incidents are dealt with in a timely manner and normal operations are restored
- Incidents are reviewed to identify improvements in policies and procedures

Incidents can occur locally, in the cloud, or through third party service providers. Reporting and management of Incidents shall occur similarly. Third party providers shall also be governed by contract terms and liability as defined in their operational agreements.

DATA CLASSIFICATIONS

Incidents vary in impact and risk depending on a number of mitigating factors including the content and quantity of the data involved. It is critically important that Cornerstone Community Action Agency management respond quickly and identify the data classification of the Incident. This allows staff to respond accordingly in a timely and thorough manner.

All reported Incidents shall be classified as below in order to assess risk and approaches to mitigate the situation. Data classification shall refer to the following Cornerstone Community Action Agency data categories:

Public Data - Information intended for public and community use or information that can be made public without any negative impact on Cornerstone Community Action Agency or its customers.

Confidential/Internal Data - Information of a more sensitive nature to the business of Cornerstone Community Action Agency This data represents basic intellectual capital, applications, and general knowledge. Access shall be limited to only those people that need to know as part of their role within Cornerstone Community Action Agency Employee and customer PII (with the exception of Social Security Numbers (SSN), financial information, or other critical information) falls within this classification.

Highly Confidential Data - Information that, if breached, causes significant damage to Cornerstone Community Action Agency operations, reputation, and/or business continuity. Access to this information should be highly restricted. Customer PII falls into this category of data. Employee or Customer Financial Information, Social Security Numbers, and other critical information also fall into this classification.

INCIDENT REPORTING

The following process shall be followed when responding to a suspected Incident:

- Confirmed or suspected Incidents shall be reported promptly to the Director of Infrastructure and Executive Director. A formal report shall be filed that includes full and accurate details of the Incident including who is reporting the Incident and what classification of data is involved.
- Once an Incident is reported, the Director of Infrastructure shall conduct an assessment to establish the severity of the Incident, next steps in response, and potential remedies and solutions. Based on this assessment, the Director of Infrastructure shall determine if this Incident remains an Incident or if it needs to be categorized as a Breach.
- All Incidents and Breaches will be centrally logged and documented to ensure appropriate documentation, oversight, and consistency in response, management, and reporting.

CLASSIFICATION

Data Breaches or Incidents shall be classified as follows:

Critical/Major Breach or Incident – Incidents or Breaches in this category deal with Confidential Information or PII and are on a large scale (Cornerstone Community Action Agency- wide). All Incidents or Breaches involving Customer PII will be classified as Critical or Major. They typically have the following attributes:

- Any Incident that has been determined to be a Breach
- Significant Confidential Information or PII loss, potential for lack of business continuity, Cornerstone Community Action Agency exposure, or irreversible consequences are imminent
- Negative media coverage is likely and exposure is high
- Legal or contractual remedies may be required
- Requires significant reporting beyond normal operating procedures

Moderately Critical/Serious Incident – Breaches or Incidents in this category typically deal with Confidential Information and are on a medium scale (e.g. <100 users on the internal network, application or database related, limited exposure). Incidents in this category typically have the following attributes:

- Risk to the Cornerstone Community Action Agency is moderate
- Third party service provider and subcontractors may be involved

- Data loss is possible but localized/compartimentalized, potential for limited business continuity losses, and minimized Cornerstone Community Action Agency exposure
- Significant user inconvenience is likely
- Service outages are likely while the breach is addressed
- Negative media coverage is possible but exposure is limited

Low Criticality/Minor Incident – Incidents in this category typically deal with personal or internal data and are on a small or individualized scale (e.g. <10 users on the internal network, personal or mobile device related). Incidents in this category typically have the following attributes:

- Risk to the Cornerstone Community Action Agency is low
- User inconvenience is likely but not Cornerstone Community Action Agency damaging
- Internal data released but data is not customer, employee, or confidential in nature
- Loss of data is totally contained on encrypted hardware
- Incident can be addressed through normal support channels

INCIDENT RESPONSE

Management response to any reported Incident shall involve the following activities:

Assess, Contain and Recover Data - All Security Incidents shall have immediate analysis of the Incident and an Incident report completed by the Director of Infrastructure or their designee. This analysis shall include a determination of whether this Incident should be characterized as a Breach. This analysis shall be documented and shared with the Director of Infrastructure, Executive Director, the affected parties, and any other relevant stakeholders. At a minimum, the Director of Infrastructure shall:

Step	Action	Notes
A	Containment and Recovery:	Contain the breach, limit further organizational damage, seek to recover/restore data.
1	Breach Determination	Determine if the Incident needs to be classified as a Breach.
2	Ascertain the severity of the Incident or Breach and determine the level of data involved.	See Incident Classification
3	Investigate the Breach or Incident and forward a copy of the Incident report to the Executive Director	Ensure investigator has appropriate resources including sufficient time and authority. If PII or confidential data has been breached, also contact the Executive Director. In the event that the Incident or Breach is severe, Cornerstone Community Action Agency executive management, general counsel and the Board of Directors shall be contacted.

4	Identify the cause of the Incident or breach and whether the situation has been contained. Ensure that any possibility of further data loss is removed or mitigated as far as possible. If this loss cannot be mitigated, any Incident will be characterized as a Breach.	Compartmentalize and eliminate exposure. Establish what steps can or need to be taken to contain the threat from further data loss. Contact all relevant departments who may be able to assist in this process. This may involve actions such as taking systems offline or restricting access to systems to a very small number of staff until more is known about the Incident.
5	Determine depth and breadth of losses and limit exposure/damages	Can data be physically recovered if damaged through use of backups, restoration or other means?
6	Notify authorities as appropriate	For criminal activities where property was stolen or fraudulent activity occurred, contact the appropriate authorities and general counsel. Should the Breach involve Customer PII, notify the Cornerstone Community Action Agency Board members and Executive Director.
7	Ensure all actions and decisions are logged and recorded as part of incident documentation and reporting.	Complete Incident Report and file with Executive Director

Assess Risk and Incident Scope – All Incidents or Breaches shall have a risk and scope analysis completed by the Director of Infrastructure or their designee. This analysis shall be documented and shared with the Executive Director, the affected parties, and any other relevant stakeholders. At a minimum, the Director of Infrastructure shall:

B	Risk Assessment	Identify and assess ongoing risks that may be associated with the Incident or Breach.
1	Determine the type and breadth of the Incident or Breach	Classify Incident or Breach type, data compromised, and extent of breach
2	Review data sensitivity	Determine the confidentiality, scope and extent of the Incident or Breach.
3	Understand the current status of the compromised data	If data has been stolen, could it be used for purposes that harm the individuals whose identity has been compromised; If identity theft is involved, this poses a different type and level of risk.

4	Document risk limiting processes or technology components that contain and manage the Incident	Does encryption of data/device help to limit risk of exposure?
5	Determine what technologies or processes will mitigate the loss and restore service	Are there backups of the compromised data? Can they be restored to a ready state?
6	Identify and document the scope, number of users affected, and depth of Incident or Breach	How many individuals' personally identifiable information were affected?
7	Define individuals and roles whose data was compromised	Identify all customer, employees, or vendors involved in the Incident or Breach
8	If exploited, what will the compromised data tell a third party about the individual? Could it be misused?	Confidential Information or PII could mean very little to an opportunistic laptop thief while the loss of apparently trivial snippets of information could help a criminal build up a detailed picture associated with identity theft or fraud.
9	Determine actual or potential harm that could come to any individuals	Identify risks to individuals: <ul style="list-style-type: none"> • Physical Safety • Emotional Wellbeing • Personal or Business Reputation • Financial Implications • Identity Concerns
10	Are there wider consequences to consider?	Is there risk to another Community Action Agency, the state, or loss of public confidence?
11	Are there others who might provide support or advise on risks/courses of action?	Contact all agencies or companies impacted by the breached data, notify them about the Incident, and ask for assistance in limiting the scope of the Incident.

Notification and Incident Communications - Each Security Incident or Breach determined to be “moderately critical” or “critical” shall have communication plans documented by the Director of Infrastructure senior leadership, and their designees to appropriately manage the Incident and communicate progress on its resolution to all effected stakeholders. At a minimum, the Director of Infrastructure shall:

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C	Notification and Communications	Notification enables affected stakeholders to take precautionary steps and allow regulatory bodies to act on the Incident or Breach.
1	Are there legal, contractual or regulatory notification requirements associated with the Incident or Breach?	Review vendor contracts and compliance terms, assure state and federal reporting and notifications are understood.
2	Notify impacted individuals of Incident or Breach remedies.	Provide individuals involved in the Incident or Breach with mitigation strategies to re-secure data (e.g. change user id and/or passwords etc.)
3	Determine Internal Communication Plans	Work with senior leadership and provide regular internal updates on status of Incident or Breach, remedies underway, and current exposure and containment strategies. This messaging should be provided to all internal state stakeholders and management. Messaging shall be coordinated through the Executive Director.
4	Determine Public Messaging	Prepare and execute a communication and follow-up plan with the Executive Director and senior leadership. Communication strategies need to define audience(s), frequency, messaging, and content.
5	Execute Messaging Plan	Working through the Executive Director and appropriate leadership, execute the public and internal communication plans. Depending on the nature and scope of the Incident or Breach, multiple messages may need to be delivered as well as press and public communiques. Minimally notifications should include: <ul style="list-style-type: none"> • A description of the Incident or Breach (how and when it occurred) • What data was involved and whose data was compromised • Details of what has been done to respond to the Incident or Breach and any associated risks posed • Next-steps for stakeholders • Cornerstone Community Action Agency contacts for the Incident or Breach, any follow-up, and other pertinent information • When notifying individuals, provide specific and clear advice on the steps

		<p>they can take to protect themselves and what the Cornerstone Community Action Agency and/or third party vendor will do to help minimize their exposure</p> <ul style="list-style-type: none"> • Provide a way in which they can contact Cornerstone Community Action Agency for further information or to ask questions about what has occurred (e.g. a contact name, helpline number or a web page)
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Post Mortem Evaluation and Response – Each Incident or Breach determined to be “moderately critical” or “critical” shall have a post mortem analysis completed by the Director of Infrastructure and their designees to appropriately document, analyze, and make recommendations on ways to limit risk and exposure in the future. At a minimum, the Director of Infrastructure shall:

D	Evaluation and Response	To evaluate the effectiveness of Cornerstone Community Action Agency response to the Incident or Breach.
1	Establish where any present or future risks lie.	Assess and evaluate the root causes of the Incident or Breach and any ways to mitigate and/or prevent a similar occurrence.
2	Consider the data and security measures employed.	Evaluate, analyze, and document the use cases and technical components of the Incident or Breach. Document areas for improvement in environment, technology, or approach that limit future security exposures. Make recommendations as appropriate.
3	Evaluate and identify areas of weakness in existing security measures and procedures.	Document lapses in process, procedure, or policy that may have caused the Incident or Breach. Analyze and document solutions and remedies to reduce future risks.
4	Evaluate and identify areas of weakness related to employee skills.	Assess employee readiness, education, and training. Document and plan for updates in education or procedural changes to eliminate potential for future Incidents.
5	Report on findings and implement recommendations.	Prepare report and presentation to Cornerstone Community Action Agency for major Incidents or Breaches.

Each of these four elements shall be conducted as appropriate for all qualifying Incidents or Breaches. An activity log recording the timeline of Incident management shall also be completed. Reporting and documentation shall be filed and managed through the Director of Infrastructure.

5. Audit Controls and Management

On-demand documented procedures and evidence of practice should be in place for this operational policy. Appropriate audit controls and management practice examples are as follows:

- Archival completed Incident Reports demonstrating compliance with reporting, communication and follow-through.
- Executed communication plans for Incident management.
- Evidence of cross-departmental communication throughout the analysis, response and post- mortem processes.

6. Enforcement

Staff members found in policy violation may be subject to disciplinary action, up to and including termination.

7. Distribution

This policy is to be distributed to all Cornerstone Community Action Agency staff.

Section: Safety
Policy: Information
Policy No.: 607
Effective Date: 11/25/19
Revised:

607 – INFORMATION TECHNOLOGY SECURITY

This policy defines the acceptable use and security of all Cornerstone Community Action Agency computer and communication system assets.

Scope

This policy applies to all employees and third-parties with access to Cornerstone Community Action Agency electronic information resources.

Policy

Account Management and System Access

Each computer and communication system user ID must uniquely identify only one user. Shared or group user IDs will not be created or used. Generic user IDs based on job function will not be created or used. User IDs will not be reassigned after an employee terminates their relationship with Cornerstone Community Action Agency. All user IDs and accounts will be created by the Director of Infrastructure or their designee.

Each user ID will be required to have passwords that adhere to Cornerstone Community Action Agency's current password policy which includes the following elements: minimum length of 8 characters, combination of alpha and numeric or special characters, and password duration of 6 months and rotation.

Application Security

The Director of Infrastructure or designee will maintain all PC, laptop, and server configuration to maintain consistency.

It is prohibited to allow remote access to routers for long periods of time. If remote access to a router is needed, the Director of Infrastructure will give access and will close all remote access immediately after remote access is no longer needed.

Employees with PCs and laptops must keep their machines updated in order to stay secure. The Director of Infrastructure or their designee will periodically check for machines that are out-of-date and will immediately perform the update if needed. It will be the responsibility of the Director of Infrastructure or their designee to keep the server updated at all times.

All Cornerstone Community Action Agency routers, switches and other devices that allow access to network resources will have the default IP address and administrator password changed upon installation. Routers, switches and other devices will be kept behind a locked door where access will only be given to appropriate employees.

All Cornerstone Community Action Agency wireless networks will maintain a WPA2/TKIP password for access to network resources.

If Cornerstone Community Action Agency maintains servers that host applications or services accessible over the internet, Cornerstone Community Action Agency will logically segment network resources and services, so that those intended for internal use only are separated into private IP networks and those intended to be accessible from the Internet are separated into public IP networks. Cornerstone Community Action Agency will at a minimum use firewall and access control list technologies so that only necessary Internet ports and services are open to appropriate network resources.

Every employee who examines, processes, or stores Cornerstone Community Action Agency information must regularly run the most current version of a virus detection software package approved by the Director of Infrastructure.

Any user who suspects infection by a virus or malicious software must immediately call the Director of Infrastructure for help in eradicating the virus or malicious software.

Authorized Equipment and Software

Users must not install Cornerstone Community Action Agency software on their personal computers, network servers, or other machines without receiving advance authorization to do so from the Director of Infrastructure.

Cornerstone Community Action Agency will ensure that only software that has been evaluated and pre-approved by Cornerstone Community Action Agency is installed on any of its Computing Devices or network devices.

Backup, Recovery, Testing, and Continuity of Operations

Data will be protected by regular backups. The Director of Infrastructure or designee will be responsible for the backups. All backup data must be stored in a 256-bit encryption method. Backup copies must be stored in an environmentally protected and controlled offsite location. Stored copies must be labelled with a short description that includes Backup Date, Resource Name, Type of Backup (Incremental/Full).

Annually, the Director of Infrastructure will test backup systems and report any failures directly to the Executive Director. The inability to restore all files or any difference in the backup is noted as a failure.

Data Classification

Incidents vary in impact and risk depending on a number of mitigating factors including the content and quantity of the data involved. It is critically important that Cornerstone Community Action Agency management respond quickly and identify the data

classification of the Incident. This allows staff to respond accordingly in a timely and thorough manner.

All reported Incidents shall be classified as below in order to assess risk and approaches to mitigate the situation. Data classification shall refer to the following Cornerstone Community Action Agency data categories:

Public Data - Information intended for public and community use or information that can be made public without any negative impact on Cornerstone Community Action Agency or its customers.

Confidential/Internal Data - Information of a more sensitive nature to the business of Cornerstone Community Action Agency This data represents basic intellectual capital, applications, and general knowledge. Access shall be limited to only those people that need to know as part of their role within Cornerstone Community Action Agency. Employee and customer PII (with the exception of Social Security Numbers (SSN), financial information, or other critical information) falls within this classification.

Highly Confidential Data- Information that, if breached, causes significant damage to Cornerstone Community Action Agency operations, reputation, and/or business continuity. Access to this information should be highly restricted. Customer PII falls into this category of data. Employee or Customer Financial Information, Social Security Numbers, and other critical information also fall into this classification.

Development or Acquisition of Information Resources

Cornerstone Community Action Agency will assess information resources annually. In the event that information resources are needed, the Director of Infrastructure will develop a plan to acquire the necessary hardware and software to keep the agency serving people within its service area. The Director of Infrastructure will work with the Executive Director and the Fiscal Department to come up with a cost effective solution for all information resource needs.

Any information resources developed using Cornerstone Community Action Agency equipment and/or time will result in the sole ownership of said resource by Cornerstone Community Action Agency.

Encryption

Cornerstone Community Action Agency will use 256-bit encryption or better when encrypting Protected Information.

Handling and Responding to Security Incidents

Management response to any reported Incident shall involve the following activities:

Assess, Contain and Recover Data - All Security Incidents shall have immediate analysis of the Incident and an Incident report completed by the Director of

Infrastructure or their designee. This analysis shall include a determination of whether this Incident should be characterized as a Breach. This analysis shall be documented and shared with the Director of Infrastructure, Executive Director, the affected parties, and any other relevant stakeholders.

All Incidents or Breaches shall have a risk and scope analysis completed by the Director of Infrastructure or their designee. This analysis shall be documented and shared with the Executive Director, the affected parties, and any other relevant stakeholders.

Each Security Incident or Breach determined to be “moderately critical” or “critical” shall have communication plans documented by the Director of Infrastructure or their designees to appropriately manage the Incident and communicate progress on its resolution to all affected stakeholders.

Each Incident or Breach determined to be “moderately critical” or “critical” shall have a post mortem analysis completed by the Director of Infrastructure and their designees to appropriately document, analyze, and make recommendations on ways to limit risk and exposure in the future.

Physical Security

The display screens for all personal computers used to handle sensitive or valuable data must be positioned such that the information cannot be readily viewed through a window, by unauthorized persons walking in a hallway, or by unauthorized persons waiting in reception and related areas. Care must also be taken to position keyboards so that unauthorized persons cannot readily see workers enter passwords, encryption keys, and other security-related parameters.

When not being used by authorized workers, or when not clearly visible in an area where authorized persons are working, all hardcopy sensitive information must be locked in file cabinets, desks, safes, or other furniture. When not being used, or when not in a clearly visible and attended area, all computer storage media containing sensitive information must be locked in similar enclosures.

When not being used by authorized workers, all computers’ operating systems must be put in lock mode to prevent unauthorized access to sensitive information.

Cornerstone Community Action Agency facilities will be restricted to appropriate personnel using access restraints such as access cards or keys. Servers, network equipment, and backup media shall be maintained in locked, unlabeled facilities with access restricted to designated employees.

Portable Computing Devices and Media

Portable Computing Devices include laptops, handheld computers, tablets, personal digital assistants, and cell phones.

Portable media includes any removable discs, USB flash storage devices, hard drives, CDs and DVDs.

Portable computing devices or media containing protected information of individuals shall comply with the following requirements:

Portable computing devices will be password protected.

Cornerstone Community Action Agency will not physically transport portable computing devices or media containing Personal Information of individuals outside of its facilities or from one facility to another without encrypting all Protected Information following the encryption requirement for Secure Electronic File Transfer.

Release and Disposal of Information Resources

Cornerstone Community Action Agency will consult the Texas Department of Housing and Community Affairs regarding the transfer, sale, or disposal of all computing devices, network devices, and electronic media containing Texas Department of Housing and Community Affairs Protected Information and provide for sanitization of said information using industry best practices like those defined in NIST Special Publication 800-88.

Secure Disposal of Protected Information

All electronic media containing Protected Information scheduled for disposal or recycling must be erased using methods defined in NIST Special Publication 800-88 guidelines for data sanitation. All electronic media containing Protected Information scheduled for disposal or recycling must have written consent from the Director of Infrastructure before being disposed of or recycled. Until written consent is given for the disposal or recycling of such data, it is the responsibility of employees to keep the data in a secure location.

Secure Physical File Transfer

In the event that it becomes necessary to transfer physical files from one location to another, any Protected Information must never be positioned such that the information cannot be readily viewed through a window, by unauthorized persons walking in a hallway, or by unauthorized persons waiting in reception and related areas. Upon transporting physical files, employees must go from one location to another without stopping except for reasonable reasons and should never let the physical files be out of their sight.

Secure Electronic File Transfer

For file security or file transfer requiring encryption, Cornerstone Community Action Agency will use 256-bit FIPS 140-2 approved security functions.

Cornerstone Community Action Agency will not email Protected Information unless the information is encrypted following the encryption defined above.

Cornerstone Community Action Agency will not use unencrypted Internet protocols, such as Hyper Text Transfer Protocol (“HTTP”) or File Transfer Protocol (“FTP”), to transfer Protected Information over the internet. Cornerstone Community Action Agency will use

Secure File Transfer Protocol (“SFTP”) with 256-bit encryption or better or HTTPS with Transport Layer Security (“TLS”) [version 1.2 or later] with 256-bit encryption or better.

Security Awareness and Training for Employees

All employees must complete an information security training course annually. New employees must also be trained on the policy within 15 days of the date when they begin employment at Cornerstone Community Action Agency.

Testing and Monitoring

The Director of Infrastructure will monitor and test this policy annually and make necessary adjustments depending on the outcomes observed.

Violations

Any violations of this policy may result in disciplinary action, up to and including termination of employment.

Section: Safety
Policy: Passwords
Policy No.: 608
Effective: 11/25/19
Revised:

608 – PASSWORDS

Overview

Passwords are an important aspect of computer security. They are the front line of protection for user accounts. A poorly chosen password may result in a compromise of Cornerstone Community Action Agency’s entire network. As such, all Cornerstone Community Action Agency employees (including contractors and vendors with access to Cornerstone Community Action Agency systems) are responsible for taking the appropriate steps, as outlined below, to select and secure their password.

Scope

This policy shall apply to all employees, contractors, and affiliates of Cornerstone Community Action Agency, and shall govern acceptable password use on all systems that connect to Cornerstone Community Action Agency network or access or store Cornerstone Community Action Agency data.

Policy

Password Creation

- All user and admin passwords must be at least [8] characters in length and utilize 3 of the 4 following: upper case letters, lower case letters, special characters, and numbers. Longer passwords and passphrases are strongly encouraged.
- Passwords must be completely unique, and not used for any other system, application, or personal account.
- Default installation passwords must be changed immediately after installation is complete.

Password Aging

- User passwords must be changed every [6] months. Previously used passwords may not be reused.

Password Protection

- Passwords must not be shared with anyone (including coworkers and supervisors), and must not be revealed or sent electronically. All passwords are to be treated as sensitive, confidential Cornerstone Community Action Agency information.
- Passwords shall not be written down or physically stored anywhere in the office.
- When configuring password “hints,” do not hint at the format of your password (e.g., “zip + middle name”)
- User IDs and passwords must not be stored in an unencrypted format.

Enforcement

It is the responsibility of the end user to ensure enforcement with the policies above.

If you believe your password may have been compromised, please immediately report the incident to the Director of Infrastructure and change the password. Any employee found to have violated this policy may be subject to disciplinary action, up to and including termination of employment.

Section: Record Retention
Policy: Record Retention Policy
Policy No.: 700
Effective: 1/31/2019
Revised:

700 - RECORD RETENTION POLICY

1. Overview

CCAA retains records as required by law or grant/contract terms and conditions and destroys them when no longer required or needed. This policy applies to both paper and electronic records. Each project director is responsible for checking contract or grant requirements to ensure that record retention requirements are met. Each Program Director is responsible for ensuring that procedures are in place to follow this policy, including training and regular monitoring. Once records are no longer needed, care must be taken to ensure that records containing confidential information are shredded or otherwise disposed of to ensure that the confidential information is not disclosed. Questions should be directed to the Executive Director.

2. Document Destruction and Litigation Holds

Once the document retention period has expired, and the items are no longer needed, the documents shall be destroyed and any confidential documents and/or those containing “Personal Information” shall be shredded. “Personal Information,” is the first name and last name or first initial and last name of a person in combination with any one or more of the following data elements that relate to the person:

- a) Social Security number (“SSN”),
- b) Driver’s license number or state-issued identification card number,
- c) Financial account number, or credit or debit card number,
- d) Address,
- e) Date of Birth

3. Record Retention Period

The required period for retention of records is listed below. Unless otherwise noted, you may retain the records for a longer period if necessary for the administration of the program and there is available storage space. Records may be kept in electronic or hard copy form, but if they are in electronic form, you should save on the server in an appropriate labeled folder to ensure that the records will be accessible when needed. In addition, if records are kept only in electronic form, the funding source may require notification or prior approval.

Accounting/Financial Records

Internal Controls	3 Years
Accounts Receivables, Ledgers, and Schedules	3 Years
Bank Deposit Slips	3 Years
Bank Reconciliations	3 Years
Bank Statements	3 Years
Budgets	3 Years
Check Disbursement Requests	3 Years
Cost Allocation Records	3 Years
Donation Records	3 Years
Garnishments	3 Years
General Ledgers/ Year End Trial Balance	3 Years
Invoices	3 Years
Journals/Ledgers	3 Years
Notes Receivables, Ledgers, and Schedules	3 Years
Travel Advance and Reimbursement Records	3 Years
Payroll Records (Including Leave)	5 Years
Time Sheets	5 Years
Withholding Tax Statements (W-4)	5 Years
Audit Reports	Permanent
Chart of Accounts	Permanent
Depreciation Schedule	Permanent
Form 990	Permanent

Retention Period

Corporate Records

Articles of Incorporation	Permanent
By-Laws and Amendments	Permanent
Board of Directors Meeting Minutes	Permanent
Tax-Exempt Determination from IRS	Permanent

Retention Period

Legal Records

Claims and Litigation	10 Years
Trademark Registrations and Copyrights	Permanent
Correspondence (Of Historical or Legal Importance)	Permanent

Retention Period

Insurance Records

Insurance Policies/Claims	7 Years
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Retention Period

Program Records

Client Files and Records	5 Years
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Retention Period

Procurement Records

Bids/Vendor Selection Records	3 Years
Purchasing Department Records	3 Years

Retention Period

Property Records

Inventories
Leases
Deeds, Mortgages, and Bill of Sales
Depreciation Schedules
Property Appraisals

Retention Period

3 Years
7 Years
Permanent
Permanent
Permanent

Human Resources Records

Applications/Background Checks (Not Hired)
Leave Information (Including FMLA)
I-9
Personnel File (Terminated Employees)
Personnel File (Current Employees)
Pension Records

Retention Period

1 Year
1 Year
3 Years
5 Years
Permanent
Permanent