HOMEFULL POLICIES AND PROCEDURES MANUAL

Updated May 2026

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AGENCY OVERVIEW

MISSION STATEMENT

(COA: GOV1, GOV3, MHSU1, HSCL1; CSB: E2, E8, E9)

The bold vision of Homefull is "a community where there is no homelessness." Our mission is "to work to end homelessness by providing housing, services, advocacy and education." Homefull provides case management services. Homefull offers an intensive service coordination approach in which trained professionals are established by Homefull to provide specialized services for homeless individuals, those at imminent risk of homelessness and previous homeless individuals and families. These trained professionals assist in developing a comprehensive assessment, where issues are identified, prioritized, and addressed. Homefull provides specific information and education to the team regarding combined effects of homelessness, or mental health issues and/or substance abuse, and acts as a coordinating liaison for goal development, integrated case planning, and acquisition of appropriate community-based services. Regular case monitoring by Homefull, the client, and the case manager, with an emphasis on flexibility and efficiency through collaboration and a client-informed decision-making process, combined with the comprehensive assessment allows for a robust and highly impactful case management process. Homefull highly values client partnership in case planning as well as continuing to perform better for our clients. Case management and support services allow consumers and their significant others the opportunity to receive information and support in a safe environment. This model champions timely, appropriate, holistic, and integrated case planning. It provides advocacy and community referral options for consumers who have in the past found services to be unavailable, inflexible, or inappropriate.

Homefull's Program design is guided by several principles: (1) individuals will be eligible for involvement in the program regardless of their current attitudes and beliefs about homelessness; (2) involvement with program consumers is holistic in that all problems of community integration are addressed, not just those issues relating to homelessness; (3) the consumer and family are the decision-makers regarding the specific goals and objectives of programming, while the Homefull staff are information providers and facilitators; (4) attitudes, skills, and beliefs that are acquired in an individual's community are more likely to be sustained than those skills learned elsewhere; (5) the client, family, and service providers are a team whose efforts need to be actively coordinated; and (6) when facilitated through case-specific case management and consultation, the expertise of local service providers is extremely applicable to the problems experienced by homeless people.

AGENCY OVERVIEW
Goals & Purpose of the Program

Policy:
The purpose of the program is to demonstrate the effectiveness of a case management model for Homefull's target population.

Goals of the Program:

- To overcome the condition of homelessness and housing instability,
- Increase income,
- Obtain housing stability, and
- Provide linkage to mainstream benefits

AGENCY OVERVIEW
Planning/Target Population
(COA: ASE2)

Policy:
The target population for Homefull is individuals and families at imminent risk of homelessness, those who are currently homeless, and those who were recently homeless. Homefull clients will be 18 years of age and older unless they are members of a household. Unaccompanied youth under the age of 18 are referred to a local provider specializing in serving unaccompanied minors for assistance.

AGENCY OVERVIEW

Program Description
(COA: HSCL5)

Policy:
The Board of Trustees approves, monitors, and revises as needed all programs provided by Homefull. Homefull programs include, but are not limited to, the following:

Prevention Services
Assist low-income residents who are at risk of becoming homeless with flexible financial assistance and case management. Activities include deposit and/or first month's rent assistance, mediation for landlord tenant disputes, linkage to legal services, and referrals to community-based programs.

Outreach Services
Outreach workers target specific areas of Dayton to build relationships with the hardest to serve street homeless by meeting basic needs and engaging them for further services. Also serves as a point of contact for local citizens and businesses regarding homelessness.

Shelter Services
Initial Front Door and full Comprehensive assessments to single adults and families with children currently residing in the Montgomery County emergency gateway shelters. Serves as front door (aka Coordinated Entry) to community housing programs.

Rapid Rehousing
Successful model of scattered site supportive housing which combines short-term rental subsidies and home-based case management services with linkage to community-based services.

Housing Case Management Services
Assists individuals and families in locating, obtaining, and retaining suitable housing. Includes diversion, web-based housing locator service, housing search and placement assistance, leasehold education, mediation, and active outreach to property owners.

Outpatient Mental Health Services within Permanent Supportive Housing Programs
Long term community-based housing and supportive services to homeless persons with disabilities. Locations include the Family Living Center, River Commons, Fisher Square, Iowa Avenue and Ohio Commons in Dayton, and the Mediterranean and scattered site units in Columbus.

AGENCY OVERVIEW
Hours of Operation

Policy:
The services of Homefull are offered at times and in such a way as to accommodate the needs of the target population.

Procedure:
Homefull program hours are as follows:

Permanent Supportive Housing:

A. Iowa Avenue Supportive Housing, Ohio Commons, Family Living Center
   Every day, 24 hours

B. River Commons Supportive Housing
   Every day, 16 hours

C. Fisher Square Family Supportive Housing
   Community – on call 24/7

D. Columbus PSH
   Community – on call 24/7
   The Mediterranean (Isaiah Project) – 9:00am-5:00pm

Shelter Services:

A. Coordinated Entry Assessment at Apple St. Shelter for Women and Families
   Monday-Friday, 7:00am-6:00pm with on call options for Saturdays

B. Coordinated Entry Assessment at Gettysburg Gateway for Men
   Monday-Friday, 7:00am-6:00pm with on call options for Saturdays

Administration & RRH/Prevention Services

A. RRH/Prevention
   Monday-Friday, 9:00am-5:00pm

B. Administration
   Monday-Friday, 9:00am-5:00pm

AGENCY OVERVIEW

Board of Trustees and Articles of Incorporation
(COA: GOV4, GOV7, RPM1; CSB: A1, A2)

Policy:

Homefull shall be governed and all authority exercised by the Homefull Board of Trustees. The Board of Trustees is governed by the Bylaws which include selection of members, determining a quorum, designating officers, terms of office, conflict of interest, and new members. The Board of Trustees is responsible for reviewing, adopting, and approving Homefull's Bylaws. The Board of Trustees has governance policies that facilitate ethical governance, meets legal requirements of governance, and assures stakeholders the governance is active in, and accountable to, the organization.

New members are provided with a copy of Homefull's Bylaws which include responsibilities of the Board. In addition, new members will be encouraged to visit Homefull and to meet Homefull staff who will be able to answer questions about the services offered. In order to avoid any conflict of interest, Board members will not be employed by or contract with Homefull, nor will any Board member serve in an advisory capacity with Homefull.

Homefull Board of Trustees recruits board members who are representative of the specific cultures the organization serves and the populations being served. Specifically, the Board will include one member who is currently or formerly homeless.

Procedure:

Homefull Board of Trustees shall consist of not more than 21 persons. One-third of the voting members of the Board of Trustees shall constitute a quorum for the transaction of business.

The election of Directors shall take place at the Annual Meeting of the Corporation or at such other times as the Board shall determine. Trustees shall serve for a term of three years or further if renewed. The Board of Trustees has officers including a president, vice president, secretary, and treasurer. The term of office for the President and Treasurer shall be two years, and the term of office for the Vice President and Secretary shall be one year. These terms shall commence on the beginning of the calendar year following election.

New members will be oriented to the Board by veteran members; each continuing member is responsible for orienting the new Board member to certain programs and policies/procedures. New members are provided with a copy of Homefull's Bylaws which include responsibilities of the Board. In addition, new members will be encouraged to visit Homefull and to meet Homefull staff who will be able to answer questions about the services offered. Board members will have access, upon request, to Homefull Quality Assurance Plan documents and other pertinent information.

Through its Corporate Compliance Plan, the Board of Trustees of Homefull addresses the use of external advisors, auditors, and consultants. The Board of Trustees annually assesses its Board

composition to assure it meets the standards set forth in the Bylaws. An assessment of skill sets and affiliations are prepared each year by the Board of Trustees.

A copy of the Bylaws and Articles of Incorporation are kept in the official Board Book, maintained by the CSO and CEO.

AGENCY OVERVIEW
Roster of Board Members
(COA: GOV3)

Policy:
A table of organization is included in the Board Book, maintained by Homefull's CEO or designee, and shows the position of the Homefull Board of Trustees and the CEO in relation to the overall Board of Trustees and the staff of Homefull. It also reflects the lines of authority for all positions of Homefull and is reviewed at least annually by the Board.

Homefull will also keep on file a roster of current Homefull Board members in the Administrative office and in the Board Book.

AGENCY OVERVIEW
Board of Trustees: Ethical Practice
(COA: RPM1, ASE1; CSB: A4)

Policy:
Homefull will actively demonstrate efforts, activities, and interest in corporate responsibility as it assists in advocating for persons served, promoting ethical business practices, and developing efficiency as an organization.

Procedure:
Homefull will demonstrate corporate responsibility by following the ethical codes of conduct set by Homefull in these areas:

- Business
- Marketing
- Service Delivery
- Professional Responsibilities
- Human Resources
- Corporate Compliance
- Consumption of Resources
- Environmental Impact

Homefull staff is informed and annually trained on the Code of Ethics related to their professional licenses and certifications, Homefull code of conduct as related to service delivery, and professional responsibilities.

Homefull will also follow Homefull's written procedures to deal with allegations of violations of ethical codes, as well as their written procedures on waste, fraud, abuse, and other wrongdoing which include a no reprisal approach for personnel reporting and a time frame for investigating such reports.

Homefull will actively engage in advocacy efforts for persons served and document such activities in the clinical record or through the Quality Assurance Plan process.

Homefull will follow all policies on contractual relationships within the program.

Homefull is committed to reducing the organization's negative impact on the environment by reducing overconsumption of resources and appropriately planning expenditures to reduce both cost and usage of supplies.

AGENCY OVERVIEW

Board of Trustees: Assurances of Non-Discrimination

(COA: RPM1)

Policy:

Homefull's Board of Trustees ensures that the organization prohibits discrimination in the provisions of services to clients, staff hiring, or volunteer recruitment based on race, ethnicity, color, religion, creed, sex, gender, gender identity/expression, sexual orientation, political affiliation, union activity, disability (including physical or mental handicap or developmental disability), national origin, ancestry, age, inability to pay for services, lifestyle, familial status, HIV/AIDS status, military status, or any other class protected by federal, state, or local law.

Homefull adheres to the intended purpose and practices of Homefull Equal Employment Opportunity policy found in Homefull's Personnel Policies.

Procedure:

The Board will regularly review HR practices, compliance with applicable laws and regulations, and risk management issues as raised by the CEO and through annual approval of plans.

AGENCY OVERVIEW
Fraud Policy
(COA: GOV8)

I. Purpose

Homefull is committed to the highest standards of accountability in all its affairs. Homefull embraces a culture of honesty, ethics and integrity and will vigorously pursue the prosecution of those who commit fraud and theft within Homefull. Fraud depletes Homefull of vital resources. This policy outlines Homefull's commitment to deter and detect fraud and theft. This policy complements Homefull's Corporate Compliance Plan.

II. Definitions

A. Fraud – an act of deceiving or misrepresenting in order to secure unfair or unlawful gain.
B. Theft – includes embezzlement or misappropriation – the act of appropriating dishonestly for one's own use property entrusted to one's care.
C. Corruption – the offering, giving, soliciting, or acceptance of an inducement or reward which may influence the action of another person.
D. Reporter – an individual who reports a suspected incident(s) of fraud, theft, or corruption

III. Policy

A. Responsibilities of Staff – all employees, regardless of position, are expected to assist in preventing and/or identifying fraud, theft and corruption (collectively referred to as "fraud" for the remainder of this policy).
B. Reporting Fraud – employees who are aware of or suspect fraud (i.e. the "reporter") must immediately report the situation. Reporters may diHSCLose their concerns directly to their Program Manager or the CEO. Program Managers who receive a report of fraud must immediately notify the CEO, who will coordinate with the Fiscal Director and the Board of Trustees to assure investigations are initiated promptly.
C. Investigations – Upon receipt of an allegation, an investigation will be initiated through the Fiscal Director and with consultation with General Counsel as necessary. The CEO and Fiscal Director will coordinate an evaluation of internal control breakdowns for remediation and training once the investigation is complete. The CEO will act as a liaison with law enforcement and prosecutorial agencies and will pursue restitution and criminal and/or civil penalties to the fullest extent of the law. Under no circumstances should employees or others undertake investigations or discuss allegations with the individuals suspected of fraud. Investigations will be conducted by those with the professional qualifications to do so.
D. Prosecution – Homefull is committed to assisting law enforcement and/or other agencies in the prosecution of those suspected of committing fraud. In the event the State of Ohio declines to prosecute, Homefull will pursue civil actions against the perpetrator(s). Additionally, Homefull will report stolen funds to the IRS in accordance with their regulations for the investigation.

F. Harassment, Victimization, or Retaliation - Homefull will not tolerate harassment, victimization or retaliation against those who report fraud.
G. Malicious Allegations – if intentionally false and malicious allegations are made, disciplinary action may be considered against the reporter.
H. Employees Suspected of Fraud – an employee suspected of committing or otherwise being involved in fraud may be suspended with or without pay during an investigation of the allegations. Homefull will initiate disciplinary action up to and including termination if its investigation suggests fraud has occurred.

AGENCY OVERVIEW
Board of Trustees/Legal Requirements
(COA: HR2, RPM1, CSB: E14)

Policy:
The Board of Trustees of Homefull ensures the organization operates in accordance with all applicable state and federal laws, regulations and rules including non-discrimination in employment and in services offered. The Board of Trustees will also ensure that Homefull operates in accordance with local ordinances and regulations, local zoning regulations, and program policies and procedures as required. Client services, including assessment, community support, and case management services are performed either by a licensed or credentialed professional or trained professional. It is the responsibility of the CEO to assure that service providers provide only those clinical services allowed within the scope of their license or certification.

Procedures:
All members of the staff, or applicants seeking employment, must hold appropriate education degrees and/or must also have substantial work experience in a human services discipline.

Direct client services of Homefull are provided and/or supervised by professionals with one or more of the following credentials according to the standards set forth in Ohio Mental Health and Addiction Services (OMHAS) Standards for Mental Health Treatment (5122-23):

Licensed Professional Clinical Counselor
Licensed Independent Social Worker
Licensed Psychologist
Licensed Physician
Licensed Social Worker
Licensed Professional Counselor
Trained Other

Human Resources staff will verify all credentials/licenses of potential staff members through primary source verification prior to hire. Credentials/licenses will continue to be verified for all staff members on an annual basis while employed by Homefull.

Direct client services are provided by staff that have completed an initial orientation program and have been approved by the Clinical Director to provide the service.

AGENCY OVERVIEW
Research Policy
(COA: CR3)

Policy:
Homefull permits its staff and service recipients to participate in research studies that further the vision and mission of the agency, and lead to new knowledge that will improve client care. All research studies must protect the health and safety of the participants. Health and safety of the participants will be overseen by the CEO and COO.

Procedure:
Persons or entities wishing to engage with Homefull staff or service recipients for research purposes should contact the COO.

Research requests will be reviewed by the CEO and full executive team as well as clinical staff if applicable. Informed consent and other documentation for any accepted research project will be provided by the entity conducting the project. Homefull will not provide any of the documentation material or conduct the research without a partner who has undergone a review process.

AGENCY OVERVIEW
Board of Trustees/Protection through Insurance
(COA: RPM1, RPM3)

Policy:
The Board of Trustees will assure that all professional employees of Homefull will be covered by all appropriate insurances including liability and/or malpractice insurance.

Procedure:
Homefull maintains liability and/or malpractice insurance for all professional staff as applicable. New employees of Homefull are automatically covered by Homefull's liability and/or malpractice insurance plans. Employees are informed of this at orientation and/or staff training.

The Board also ensures that Homefull assesses and reviews the following insurances:

1. workers' compensation;
2. disability;
3. fire and theft;
4. medical;
5. indemnification;
6. automobile liability;
7. property and casualty;
8. malpractice.

Currently, Homefull's health insurance benefits renew annually. Each year, benefits coordinator, McGohan Brabender, contacts the CFO and COO to request an employee census. McGohan Brabender utilizes the census to configure a current plan renewal option along with approximately six other options including different plans with the current carrier and several additional vendors. The CFO and COO meet with a representative from McGohan Brabender to review the options for presentation to the CEO. Homefull and the Board of Trustees are committed to providing a comprehensive benefit package to Homefull's employees. Therefore, the options are carefully reviewed and the benefit amounts along with the premium adjustments are carefully analyzed prior to submitting the recommendations to the Board for approval. Once the Board has approved the new benefit package, employees are notified of any changes in benefit and cost. More information on insurances specific to employee benefits can be found in the personnel policies.

Homefull's long term and short term disability benefits renew annually. A renewal letter is sent approximately 60 days prior to the renewal detailing the new rates. At that time, McGohan Brabender, the benefits coordinator, provides the option to renew at the new rate or to look at additional plan options with other carriers. Decisions are made based on a combination of favorable rates and benefits received.

Homefull's general liability, property, and vehicle insurance renews each year in November. Approximately 60 days prior to the renewal, our broker contacts Homefull administration to discuss any changes or updates to the current coverage. This includes reviewing property replacement costs at each location, vehicle limits of liability, etc. Our broker then checks on the availability of coverage with the companies they represent and provide us with rates for the renewal.

Homefull renews every three years in June for Professional Liability Insurance. Approximately 60 days prior to the renewal, Wells Fargo Insurance, our current broker, requests completion of a survey for non-profit organizations. This survey determines the coverage level and type of coverage required. Once they have the completed survey, they submit it to companies they represent and provide us with the rates for renewal.

For Workers Compensation, Homefull is part of a group rating program through our association with COHHIO. The current group rating agency is The Frank Gates Company. The updates and renewal are on a calendar year.

AGENCY OVERVIEW
Board of Trustees/Annual Approvals and Review of Plans
(COA: FIN1, GOV2, GOV5, HR1, PQI5, RPM1; CSB: E1)

Policy:
The Board of Trustees reviews and approves an annual budget for the program, the annual Quality Assurance Plan, Policies and Procedures, and all personnel policies. The Board will also review the Strategic Plan and Succession Plan and any other pertinent plans as they are developed. Revisions and additions are incorporated into the overall program implementation.

Homefull will establish and implement a Quality Assurance Plan that will be updated annually and will also be approved by the Board of Trustees. The plan will include an annual scorecard to track progress toward organization goals.

Meeting minutes of the Board of Trustees shall be maintained and on file at Homefull's Administrative Office.

Procedure:
Staff members have the opportunity to provide input on services and policies throughout the year by their involvement in a variety of committees, staff meetings and continuing education meetings. The annual budget and service plan are presented in staff meetings to facilitate staff input into the budget and planning process.

All plans will be developed by the CEO and assigned staff and will be reviewed/edited by the Board. The Quality Assurance Plan will be written and will be presented to the Board of Trustees and Staff of Homefull.

Annual review of plans includes a review of any applicable laws and codes that may impact policies and/or procedures within Homefull as they relate to governance, HR practices, services implementation or other parts of the organization. As part of the review of any policy additions or significant changes, the Board discusses and votes on new/updated policies quarterly.

The meeting minutes described above will reflect approvals and any changes of services provided by Homefull.

AGENCY OVERVIEW
Strategic and Annual Planning
(COA: GOV2, GOV5, PQI5; CSB: E1)

Policy:
Homefull engages in agency-wide strategic planning, annual planning and management to guide our direction, develop and implement goals and initiatives, assess internal and external factors, and allocate resources to accomplish strategy.

Procedure:
Homefull's overall Strategic Plan is a 3-year Plan. Within the Strategic Plan, many topics are incorporated. Together with the annual PQI/QA Plan and the DEI Plan, the Strategic Plan helps guide Homefull's work while also helping identify values and priorities of Homefull's impact.

These plans are reviewed and updated annually. This is done with the input of staff, persons served, stakeholders, and the Board of Trustees via meetings, workgroups, and presentations. All plans and updates are approved annually by the Board.

Embedded within these 3 bigger picture plans are:
1. Corporate Compliance Plan
2. Health & Safety and Accessibility Plan
3. Risk Management Plan
4. Succession Plan (and development of staff)
5. Technology and Communications Plan

AGENCY OVERVIEW
Annual Report
(COA: GOV3)

Policy:
Homefull will operate in an open and transparent manner.

Procedure:
Homefull will produce an annual report that will be reviewed and approved by the Board. The annual report will be available to the public.

AGENCY OVERVIEW
Board of Trustees/Delegation of Authority
(COA: GOV7, FIN2, FIN3, RPM1)

Policy:
This Delegation of Authority Policy is established to define the limits of authority designated to specified positions of responsibility within the organization and to establish the types and maximum amount of obligation that may be approved by individuals. The approval of commitments and transactions outlined in this policy must always be made by the parties that have been designated with the responsibility for final approval.

All employees should be aware that conduct that violates the policy is considered outside the scope of their employment. Individuals who violate these policies are subject to appropriate disciplinary action, including possible termination of employment. Persons who have employees reporting to them should take all necessary steps to ensure their employees know and follow the limits of authority set forth herein.

Section 1 Banking and Investment

1.1 Borrowing Funds
Only the Board is authorized to borrow funds under Homefull's existing credit facilities.
1.2 Granting Liens
Approvals by the Board are required in order to grant a lien on any Homefull asset.
1.3 New Credit Facilities/Borrowings
Approvals by the Board and CEO are required prior to entering into any new credit facility or borrowing arrangement.
1.4 Opening/Closing Bank Accounts
Only the CEO may open or close bank accounts in accordance with the Homefull Banking resolution.
1.5 Letters of Credit and Guarantees
Approvals by (i) the Board and (ii) CEO are required prior to executing any parent or other guarantee of any subsidiary, third-party obligation, or any letter of credit. Letters of Credit and Guarantees shall be interpreted broadly to include surety bonds, bid bonds, agreements and similar understandings.

Section 2 Expenditure Authority

2.1 Disbursement Authorization
Commitments and transactions will not be processed that are not approved in accordance with this policy and any appropriately authorized policy. Only when the underlying transaction, contract (including purchase order), or agreement has been properly approved and satisfactory evidence is available that the obligation is due, shall disbursement of Homefull funds be permitted.

2.2 Capital Expenditures
All capital expenditures must be approved and made in compliance with the annual budget approved by the Board.
2.3 Operating Expenses
Where there is an underlying transaction, contract, or agreement that has been properly approved and satisfactory evidence that the obligation is due, the authority for disbursement approval is designated as follows unless the current Banking Resolutions provide otherwise:

Title	Authority Level
CEO	Up to $15,000
COO	Up to $5,000

2.3 General and Administrative Expenses
The company shall establish clear procedures relating to the authorization of general and administrative expenses. At a minimum, such policies shall contain the following limits:

Title	Authority Level
CEO/CEO	Up to $15,000
COO	Up to $15,000
Board Treasurer	Up to $15,000

Section 3 Sales Authority

3.1 Sales of Assets
Prior to any sale of assets outside the ordinary course (including all equipment sales) with an aggregate book value exceeding $50,000, the Board shall be notified. In addition, sales of assets outside the ordinary course are subject to the following approval levels.

Title	Authority Level
CEO/CEO	$50,000

Section 4 Real Estate Matters

4.1 Purchases and Sales
The Board must review and approve all sales and purchases of real estate. Upon Board approval, the CEO may execute real estate contracts, deeds, mortgages, mortgage releases, and other related documents in the course of operation of Homefull's programs.
4.2 Leases
All real estate and equipment leases are required to be approved by the CEO. In addition, the following approval thresholds, representing the cumulative lease payments over the lease term, are applicable:

Title	Authority Level
Board of Trustees	Over $50,000
CEO	Up to $50,000

4.3 Facility Management
The CEO will authorize the day to day management and operations of real property to staff assigned to carry out the functions of property management, which includes the authority to sign

and manage real estate leases and the enforcement of tenant obligations.

Section 5 Authority to Sign Agreements

This Section 5 governs all agreements (including contracts, agreements, grants and purchase orders). Signing authority for agreements is based upon the annual value of the agreement and is subject to the following authority levels:

Title	Authority Level
Board of Trustees	All unbudgeted agreements over $50,000. All budgeted agreements over $100,000
CEO	All unbudgeted agreements up to $50,000. All budgeted agreements up to $100,000

AGENCY OVERVIEW
Duties of CEO
(COA: GOV5, GOV6, GOV7; CSB: A2)

Policy:
The Board of Trustees shall select the CEO and monitor and revise the duties and responsibilities of the CEO as needed. See Table of Organization. The Board of Trustees relationship with the CEO includes the delegation of authority and responsibility, accessibility to management and staff and support of governance by the organization. The CEO's job performance will be evaluated on an annual basis.

Board processes include agenda planning, developing and distributing meeting materials, overseeing committee work as practical to governance and management, financial audit, executive compensation, and other activities as defined by the Board.

CEO development and evaluation includes a formal annual written review in relation to overall corporate performance vs. target, individual performance vs. target, professional development accomplishments and opportunities. The Board of Trustees will also annually review executive leadership succession planning.

Executive compensation included in the HR file:

- a written statement of total executive compensation philosophy
- review by an authorized board committee (Executive Committee) comprised of board members
- defined total compensation mix, up to and including as warranted, base pay, incentive plans, benefit plans,
- a documented process that outlines the terms of compensation arrangements, approval date, names of board members on the committee who approved the compensation decision, data used in the compensation decision, disclosures of conflict of interest if any, annual review of executive compensation records and authority of board members to exercise executive compensation actions

Procedure:
The Chair of the Executive Committee of the Board of Trustees will be responsible for the selection of Homefull's CEO. The Homefull Board of Trustees, Executive Committee, completes an annual performance evaluation of the CEO. The CEO is responsible to the Board of Trustees.

These identified leadership entities are responsible for collectively guiding the following:

- Establishment of the mission and direction of the organization
- Promotion of value/achievement of outcomes in the programs and services offered
- Balancing the expectations of both the persons served and other stakeholders
- Financial Solvency

- Compliance with insurance and risk management requirements
- Ongoing Performance Improvement
- Development and implementation of corporate responsibilities
- Compliance with all legal and regulatory requirements
- Ensuring that the organization responds to the diversity of its stakeholders with respect to culture, age, gender, sexual orientation, spiritual beliefs, socioeconomic status, and language.

AGENCY OVERVIEW
Input From Persons Served & Other Stakeholders
(COA: FIN4, GOV2, HSCL7; CSB: E9)

Policy:
Homefull will request and collect input from persons served, personnel, and other stakeholders on an ongoing basis in order to help determine the expectations and preferences of the organization's audiences and to better understand how the organization is performing from the perspective of all of the above-mentioned parties.

Procedure:
Homefull collects input from stakeholders through a variety of methods:

- Consumer Satisfaction Surveys
- Staff Suggestion Box
- Other Consumer surveys
- Informal Contacts from outside sources
- Major Unusual Incident Reports
- Attendance at community-based meetings with other social service providers

All input is collected and analyzed on an ongoing basis by the Homefull Management Team and the analysis is used in the development of the organization's Quality Assurance Plans, strategic plan, program/service plans, financial planning, resource planning, and organizational advocacy.

AGENCY OVERVIEW

Fiscal Administration
(COA: FIN1, FIN4, FIN5, FIN6, GOV7, CSB: D10, D14)

Policy:

Homefull complies with all fiscal policies and procedures of generally accepted accounting principles and provides the administrative mechanism through which program operational expenses/revenues are tracked and monitored. Each year a budget will be projected by the CFO under the direction of the CEO. Homefull's annual revenue and expenditure budget will be approved by the Board of Trustees.

Procedure:

Homefull, specifically the CFO and CEO, will prepare an annual revenue and expenditure budget by program based on historical data and future projections. Revenue will be projected based on current and anticipated contracts along with reasonable estimations of private fundraising efforts. In order to comply with all contractual agreements, program budgets will reflect the appropriate expenditures to be covered by those contracts. The budget will include all direct and indirect operating expenses. The Homefull Board of Trustees will approve this budget and the approval will be reflected in the minutes of the Board.

The accounting method used is an accrual method. Copies of all financial records, including but not limited to general ledger, cash receipts and disbursements journals, payroll records, bank statements, paid invoices and contract invoices, will be kept in the administrative offices of Homefull. Homefull will utilize a financial records disclosure policy that adopts federal and state guidelines for not-for-profit corporations. Ohio Mental Health and Addiction Services (OMHAS), Council on Accreditation (COA), and any other certifying bodies will be able to conduct their own audit of Homefull financial records upon request. Annually, an independent audit (IRS A133) is conducted by an outside qualified entity. These audits are made available upon request along with IRS Form 990. IRS Form 990 and the independent audits are on file with the Ohio Secretary of State's office.

All program revenues are received by the CEO who forwards them on to the Chief Financial Officer (CFO). A bank deposit is prepared, which is copied along with the checks and filed for record keeping. The checks are deposited into the appropriate bank account and the deposit is reviewed and approved by the CEO. The CFO then allocates the receipts to the appropriate income or receivable account and enters it into the accounting system. Contributions are entered into the fundraising database and acknowledgements sent. For contract receipts, a copy of the check or stub is attached to the invoice.

All program expenses are received by the CEO who forwards them on to the CFO. The CFO gives them to the Finance Team for recording receipt of invoices in the payables log and creates payment. The CFO allocates invoices to the appropriate expense category and prepares checks. The CEO approves the allocation by initialing the invoice and signing the check. Checks are then given to the

Finance Team who notes the date paid in the payables log, sends checks to vendors and a copy of the stub and invoice are filed in the CFO's office.

Payroll is processed every two weeks. All employees are required to have direct deposit and pay stubs are available online. Records of time worked and paid time off (PTO) are prepared by each staff member via the online payroll system and then approved by their department manager or director. All timecards receive a second review by an assigned Finance Team member for accuracy and quality assurance check. The COO or designated HR associate and the CFO monitor time off usage and accrual in the online payroll system's Time Off Manager feature. PTO requests are processed through said online payroll system. The online payroll system also prepares payroll through the timecard and payroll features. Payroll for the period is by the CFO and reviewed for accuracy. As assigned Finance Team member reviews the payroll prior to the final submission. Once it is approved, the CFO submits the payroll for processing. The payroll service notifies the CFO when payroll has been processed.

The CEO receives the monthly bank statements and forwards on to the CFO. The CFO prepares the monthly bank reconciliation. The CEO reviews and initials the balanced bank reconciliation form and returns to the CFO for filing in the monthly records. Homefull will maintain ledgers that record all incoming funds and outgoing expenses.

Monthly comparative financial statements that show expenditures and revenues received by month and year to date will be generated by the CFO under the direction of the CEO. The statements will also show a comparison to the budget and any discrepancies noted. Generally accepted accounting principles will be utilized in preparing the statements.

The financial statements will be reviewed by the CEO and the Board of Trustees. The CEO is responsible for informing the Board of Trustees of the financial status of all programs. This will be reflected in the minutes of the Board of Trustees meeting. The Homefull CEO and fiscal personnel will receive on-going training in all fiscal management policies and procedures. Homefull will seek to conserve financial resources by taking advantage of tax exemptions when they apply, maintaining sound inventory control, coordinating purchases among programs, and using competitive bidding when appropriate. Upon approval from the Board, financial statements per program area are provided to the Management Team for their assigned programs. Program specific financial statements are emailed to Program Supervisors/Directors for review and discussion as needed. The Executive Team reviews full financial statements for the agency regularly.

Year-end financial statements are prepared for submission to the Board of Trustees. Annually, an independent financial audit by a Certified Public Accountant is conducted for Homefull and the audit reports are maintained by the CFO.

Homefull is responsible for timely and correct billing to the various third-party payers. Reasonable efforts will be made to collect all fees owed to Homefull. In the event that a fee is not collectable, the fees will be charged-off as un-collectible. Homefull's CEO and CFO will make the final decision as to which accounts are deemed "un-collectible."

AGENCY OVERVIEW

Fiscal Administration - Estimated Revenues
(COA: FIN1, FIN3, FIN4)

Policy:

Homefull's CEO will develop an estimated revenue plan by source of revenue and program service annually. The annual revenue plan will pursue stable, predictable sources of revenue and consider diversification and balance in funding streams that are consistent with Homefull's mission and programming. This will be incorporated into the Annual Program Budget that will be reviewed and approved by the Board of Trustees.

AGENCY OVERVIEW

Fiscal Administration -
Operating Reserve Policy
(COA: FIN1, FIN4; CSB: D10)

Policy:
This Operating Reserve Policy establishes guidelines for building and maintaining an operating reserve for Homefull, even though a dedicated fund does not currently exist. Homefull recognizes the importance of financial stability to ensure its mission of ending homelessness by providing housing, services, advocacy, and education. This policy serves as a framework to achieve that stability and respond to unforeseen challenges. The primary purpose of the operating reserve is to safeguard Homefull's financial health by providing a cushion against unexpected events, such as a sudden loss of funding, an unanticipated increase in expenses, or delays in anticipated income. The reserve intends to buy time for Homefull to implement new strategies during challenging periods. It is not intended to cover a long-term or permanent loss of funds or to address ongoing budget deficits.

Procedure:
1. Target reserve amount
Homefull will strive to build an operating reserve equivalent to three to six months of its average operating expenses. This target will be reviewed and adjusted periodically by the Board of Directors, considering factors like funding stability and the predictability of cash flow.
2. Strategies for building the reserve
Dedicated Funding: When feasible, Homefull will allocate any unrestricted year-end surpluses to build the operating reserve.
Budgetary Allocation: Homefull will explore including a line item in its annual budget to designate funds specifically for the operating reserve.
Targeted Fundraising: Homefull will seek grants or donations specifically designated for establishing or building the operating reserve.
3. Policy regarding a line of credit
Homefull maintains a readily accessible line of credit with a reputable financial institution to address potential cash flow gaps and unexpected financial challenges, particularly during the initial stages of building a dedicated operating reserve. This line of credit acts as a safety net, allowing Homefull to manage cash flow and cover payroll and other crucial expenses.
The decision to use the line of credit will be made judiciously and will be subject to the same approval process as drawing from the operating reserve fund once it's established.
Homefull will prioritize repaying any amount drawn on the line of credit as quickly as possible to minimize interest accrual and maintain favorable lending terms.
4. Authority for accessing funds
Accessing funds from the operating reserve (or utilizing the line of credit in its place) requires approval from the Executive Committee or the full Board of Directors, depending on the amount requested. This approval will be based on a thorough analysis of the financial situation necessitating the use of funds and a plan for replenishment.
5. Replenishment of the reserve

Should funds be drawn from the operating reserve or the line of credit be utilized, Homefull is committed to developing a realistic plan to replenish the fund to its target amount within a reasonable timeframe. This plan will be presented to the Board of Directors for approval.

6. Reporting and monitoring

The CEO is responsible for overseeing the implementation and adherence to this policy. Regular reports on the status of the operating reserve (and usage of the line of credit) will be provided to the Finance Committee and the Board of Directors.

7. Review and revision

This policy will be reviewed and updated at least annually by the Board of Directors to ensure it remains relevant, effective, and aligns with Homefull's financial position and strategic goals.

AGENCY OVERVIEW
Fiscal Administration - Depreciation of Capital Assets
(COA: RPM4, RPM5, PRG4; CSB: M1, M2, M8)

Policy:
Homefull establishes this policy to ensure the consistent, accurate, and compliant accounting of capital assets through the application of depreciation. This policy supports sound financial management, compliance with applicable laws and regulations, and alignment with HUD requirements and generally accepted accounting principles (GAAP).
Capital assets are recorded and depreciated to reflect the systematic allocation of cost over the useful life of the asset. Assets with a value of $10,000 or more will be capitalized and depreciated in accordance with this policy. Assets below this threshold will be expensed.

Procedure:
Definitions:

- **Capital Asset:** Property or equipment with a useful life greater than one year and a cost of $10,000 or more.
- **Depreciation:** The systematic allocation of the cost of a capital asset over its estimated useful life.
- **Useful Life:** The estimated period over which an asset is expected to be used.

Capitalization Threshold:

- Assets with a cost of $10,000 or more and a useful life greater than one year will be capitalized
- Assets below $10,000 will be expensed in the period purchased

Depreciation Method:

- Straight-line method is used unless otherwise required
- Depreciation begins when the asset is placed in service
- Depreciation continues over the estimated useful life

Useful Life Guidelines:

- Buildings: 20–40 years
- Building Improvements: 10–20 years
- Equipment and Furniture: 5–10 years
- Vehicles: 5 years
- Technology/IT Equipment: 3–5 years

Asset Tracking and Documentation:

- All capital assets must be recorded in the fixed asset system
- Records must include description, purchase date, cost, funding source, useful life, and depreciation method
- Assets must be reviewed periodically for accuracy

Disposals and Impairment:

- Assets must be removed when disposed or no longer usable
- Gains or losses must be recorded
- Impairment must be recognized if value declines

Responsibilities:

- Finance staff maintain records, calculate depreciation, and ensure compliance
- Supervisors notify finance of purchases, transfers, or disposals

Governance and Oversight:

The CEO and/or designee is responsible for oversight, implementation, monitoring, and periodic review of this policy.

Compliance:

This policy aligns with HUD requirements, GAAP, and COA standards for financial accountability.

AGENCY OVERVIEW

Fiscal Administration - Annual review of Financial Risk Assessment

(COA: GOV5, RPM2)

Policy:

Homefull will conduct an annual risk assessment.

Procedure:

Homefull's financial and administrative team will conduct an annual risk assessment that includes a review of any financial risks, the agency's financial capacities, and resources needed to provide services. The assessment will be reviewed by the Board and an action plan for addressing areas of concern will be developed.

AGENCY OVERVIEW
Annual Review of Policies and Procedures
(COA: RPM1; CSB: E1)

Policy:
The Board of Trustees shall monitor, review, and help revise Homefull policies and procedures, which include personnel policies, as needed. The full policies and procedures will be reviewed regularly.

Procedure:
The CEO and the Board of Trustees, via Committees as well as full Board, will meet a minimum of every other month (approximately 10 meetings a year are scheduled) at which time Homefull's programs are reviewed and performance reports are shared. Any updates or additions to the policies and procedures are presented to the Board who will approve or reject for addition to the formal policy and procedure manual.

Homefull will also engage in a full review of the policies and procedures manual periodically to update policies based on changes to law, operations process, and/or oversight guidelines.

Minutes of the meetings of the Board of Trustees, are dated and copies are stored in Homefull's electronic records storage for reference and review.

HUMAN RESOURCES MANAGEMENT

OVERVIEW
(COA: HR1, HR3, RPM1)

Policy:
All personnel policies and procedures of Homefull are in compliance with local, state, and federal laws and regulations that are applicable to the conditions of Homefull employment. They are reviewed every three years by authorities (or Board Members) who can include HRE professionals, attorneys and certified officials. All personnel policies apply to full time and part time employees and to interns and volunteers.

These policies shall include assurance of non-discrimination against any person or group of persons on the grounds of race, ethnicity, color, religion, creed, sex, gender, gender identity/expression, sexual orientation, political affiliation, union activity, disability (including physical or mental handicap or developmental disability), national origin, ancestry, age, inability to pay for services, lifestyle, familial status, HIV/AIDS status, military status, or any other class protected by federal, state, or local law in the recruitment, selection, promotion, evaluation or retention of employees or volunteers.

Homefull utilizes Homefull's Personnel Policies in managing its personnel.

HUMAN RESOURCES MANAGEMENT
Workforce Hiring & Recruiting
(COA: HR2, HR3, RPM1; CSB: A12)

Policy:

In seeking a qualified, diversified, and competent workforce, Homefull will maintain recruitment and selection philosophies and practices that are consistent with all federal, state, and local regulations.

Procedure:

Homefull will engage a recruitment process for filling new positions and locating replacement personnel. Our recruitment and hiring practices will advance our goal of building a work force of persons committed to the mission of Homefull. As of 2018, Homefull contracts with a 3rd party vendor for recruiting and interviewing steps and with a separate 3rd party vendor for screenings (background checks and drug tests). Both contracted companies will provide training and electronic access to designated Homefull staff.

To facilitate the efficient recruitment of candidates, the following guidelines should be followed:
1. A requisition will be completed and the necessary duties will be determined prior to the search.
2. Open positions are announced internally via All Staff emails or employee newsletters. Please see Personnel Policies section for specific policy and procedure for employees to respond to internal postings. Internal candidates will be considered prior to posting for external candidates.
3. Recruiting vendor will post the opening to designated search sites via the Applicant Tracking System being used at that time.
4. The HR Administrator will review applicants in the Applicant Tracking System portal and request a telephone pre-screen for those who are determined as qualified. Once telephone pre-screens are completed, the HR Admin will coordinate top candidates for interviews. Assigned (and trained) interview team will conduct in person interviews when possible and video interviews if needed. Special effort should be made to consider candidates from under-represented groups. Follow up interviews may be made depending on the position and candidates.
5. Once a top candidate is identified, he/she will receive a request for 3 screenings steps: background check, drug screen, and reference check. The background check and drug screen process will be managed by the 3rd party background screening company and communication regarding results will occur through their website portal.
6. Candidates who successfully clear the screening steps will receive an official offer of employment.
7. Rejected candidates will be promptly contacted and the communication process should be coordinated with the HR Administrator.
8. The HR Administrator will initiate all appropriate paperwork to authorize placing the new employee on the payroll system.
9. Program Managers will complete a performance appraisal for the new staff member within the first 90 days of employment. Early detection of performance problems and supervision during this first 90 days is very important and will be utilized to determine appropriateness of fit.

Developing a Multicultural Community
To facilitate Homefull's goal of increasing a multicultural presence, programs should make efforts to locate minority applicants for openings. Homefull makes special efforts to recruit members of the local minority community and develop internship relationships with colleges that target diverse student bodies.

Confidential Screening
It is the policy of Homefull to conduct a reference check before making an offer of employment. This will include checking public records for criminal convictions, felony charges, state and national sex offender lists and previous employers. In the event a particular position involves access to large sums of money, a credit check will also be required. The reference check information will be conducted by the HR Administrator and reviewed with the COO. The HR Administrator will share this information with the Program Manager only when it is relevant to the job performance. If the reference check uncovers information that is potentially disqualifying, the candidate will be informed per adverse action laws related to consumer reports. Results of this check will remain confidential unless essential for Homefull's legal defense in a lawsuit involving the candidate.

HUMAN RESOURCES MANAGEMENT

Relocation of Senior Staff
(COA: HR2, HR3)

***Policy*:**
When Homefull initiates new programming in a new geographic location greater than 50 miles from the home office of Dayton, Ohio, effort will be made to promote a Division Director from internal staff prior to seeking external candidates. To assist with relocation to the new city, Homefull will provide assistance to facilitate this move.

***Procedure*:**
Homefull will provide relocation assistance in the amount of $750 to the relocated employee, added to the first paycheck following their promotion date. This financial assistance is intended to supplement the costs of the relocation including but not limited to deposit on a new apartment, moving truck, utility deposits, updating driver's license, etc. Receipts are not required to be submitted to Homefull for this relocation assistance. This is considered taxable income and will have taxes deducted per regular payroll processing.

Additionally, to assist with the new cost of living in the new location, the relocated employee's raise will be effective as of the date of the promotion rather than the traditional 90 day increase following promotion that Homefull follows.

HUMAN RESOURCES MANAGEMENT
Employee Background Check and Drug Test
(COA: HR2)

Policy:
As an organization that serves a vulnerable population and has an interest in protecting clients from harm, Homefull will pursue background checks and drug screens on all employment candidates and regular, consistent volunteers with the consent of the candidate prior to an offer of official employment. All candidates will be informed of this process at the time of their interview.

Current employees may be pulled for drug testing if workplace behavior violates Code Of Conduct policies and/or signs/symptoms of use is present.

Procedure:
When a candidate for potential employment at Homefull is identified, a background check and drug screen will be conducted via a third-party company with expertise in this service. Upon identifying that a candidate is desired for hire, Homefull will extend a preliminary offer of employment, explaining that the background check and drug test must be completed before an official offer will be extended. If the candidate accepts the preliminary offer, Homefull will inform the third-party company of the candidate's contact information for follow up.

The third-party screening company will then contact the candidate to request data needed to pursue the background check and provide details and instructions on the drug test. All communication regarding the collection of information for the background check and the process of the check will be conducted between the third-party company and the candidate. Once the screening is completed, the third-party company will communicate the results to Homefull administration via a confidential report. All results are maintained electronically in personnel files.

The third-party screening company will investigate and evaluate any positive drugs screens prior to making the results available to Homefull. In some cases, candidates may be asked for further detail about specific issues revealed through the screening prior to an official offer of employment.

Homefull Human Resources staff and administration will decide on official new hire offer once these results are reviewed. Preliminary offers to candidates whose background checks contain criminal history are not automatically revoked, however, offers will be reconsidered in cases where background checks reveal past criminal behavior that could be considered a risk to the vulnerable population served by Homefull and/or a risk to client/staff safety and best interest. In all cases, candidates with sex offenses on their background checks will not be considered for employment.

Current employees meeting one of the following categories will be requested to complete a drug screen within 24 hours of receiving drug screen notification from HR staff:

- HR documentation of Code of Conduct violations or

- Show signs of reporting to work currently under the influence or
- Significantly impacted by use prior to reporting to work or
- Being involved in a vehicle accident with suspected impairment.

Current employees with positive drug screens will be immediately put on a Corrective Action plan that specifies immediate improvement of the above identified issue or depending on the severity of the infraction (including being under the influence at work) may be terminated as a result of positive test.

Drivers that are hired under specific licensure will be required to follow all Department of Transportation drug testing protocol and Homefull will maintain a US Drug Testing Center account per DOT regulations. USDTC guidelines for random testing will be followed.

HUMAN RESOURCES MANAGEMENT
Volunteer & Interns: Scope and Supervision
(COA: HR6)

Policy:
Homefull utilizes the services of students and volunteers as service providers. All Homefull's personnel policies apply to volunteers and interns with the exception of policies related to benefits.

Procedure:
Homefull has volunteers and interns who help with a variety of tasks, from stuffing envelopes for large mailings to teaching classes at our permanent supportive housing programs to assisting with case management. Some opportunities are available on a one-time or occasional basis, and the organization continually recruits volunteers and interns. Volunteers and interns are placed based on expertise or area of study. They meet with an assigned supervisor to review ongoing how their activities are proceeding and to provide support to the Volunteer/Intern for ongoing development.

Volunteers and Interns receive an orientation at the beginning of their regular schedule. This orientation will include an overview of appropriate policies, receipt of the Volunteer Handbook, and signing appropriate personnel paperwork. Student Interns who work in a case management or other client contact capacity will complete a full orientation similar to a new full time employee.

Student interns are placed according to area of focus, program affiliation, and service need within the organization. Students are supervised by appropriate supervision per their school's requirement and consistent with their Homefull program assignment. When assigned case management type duties, student interns do not complete any home visits alone; they must be in the accompaniment of a full-time staff person. Generally, student interns are not allowed to transport clients but may be approved on a case by case basic depending on program need and ensuring the student has been cleared for driving.

HUMAN RESOURCES MANAGEMENT

Non-Discrimination Policy/EEO
(CSB: A4, E11)

Policy:

Homefull adheres to the Homefull Personnel Policies regarding discrimination in the workplace. Homefull follows an Equal Employment Opportunity practice that prohibits discrimination based on any protected class, including but not limited to: race, religion, color, national origin, ancestry, sex, sexual orientation, gender identity, age, disability or other handicap status, and includes volunteers/interns in this protection.

Procedure:

This policy requires that equal access to admissions, programs/services, employment opportunities, and all other activities of Homefull be extended to all persons.

It is the goal of Homefull to hire a culturally diverse staff at all levels. Program areas will also attempt to address the need for culturally specific and relevant programming for ethnic minorities, individuals with disabilities, and other underrepresented populations.

Homefull will pursue the goal of attempting to maintain a staff ratio reflective of the cultural composition of the consumers referred to its services/programs. This tracking will be maintained by executive staff including the CEO and human resources personnel, reviewed regularly, and discussed with the Board as appropriate.

HUMAN RESOURCES MANAGEMENT

Nepotism Policy

(COA: HR1; CSB: A2)

Policy:

Relationship by family or marriage constitutes neither an advantage nor a deterrent to employment by Homefull, provided that the individual meets the appropriate standards for the position to be filled and provided that the individual will not be in the chain of supervision of a spouse, family member, or person with whom the individual is dating. Employment will be denied under the following circumstances:

1. Where one family member would be responsible for auditing the work of another;
2. Where other circumstances exist which would place family members in a situation of actual or reasonably foreseeable conflict between Homefull's interest and their own.

Process:

Applicants who are denied employment to a particular position for one of the foregoing reasons will be considered for other vacant positions for which they may be qualified. Failure to advise Homefull of the existence of one of these circumstances may result in a withdrawal of an offer of employment or actual discharge from employment.

Existing Homefull employees who become involved in one of the foregoing circumstances have an obligation to advise the CEO about the conflict. Every effort will be made to resolve the conflict without loss of employment to either employee; however, Homefull reserves the right to transfer one or both employees, to discharge one or both employees or to demote one or both employees to resolve the conflict. Employees who fail to advise Homefull of a family, spousal or dating relationship under one of these circumstances will be subject to discipline, up to and including termination.

HUMAN RESOURCES MANAGEMENT
Sexual Harassment

Policy:
Any means of sexual harassment against a client, employee, contract worker, student intern, volunteer, family member or significant other of a client, or any visitor to Homefull is expressly prohibited.

Any violations of this policy will be dealt with according to Homefull's Personnel Policies.

HUMAN RESOURCES MANAGEMENT
Annual Performance Evaluations
(COA: HR4, PQI2, PQI5)

Policy:
Employees of Homefull are evaluated annually. Probationary evaluations are required for all new employees and for those promoted to a new position.

Procedure:
Evaluations, both probationary and annual, are completed by the direct supervisor and are reviewed and counter-signed by the CEO. Performance evaluations are directly related to Homefull's Quality Assurance Plan goals. Annual performance reviews will occur in January of each year for the previous calendar year in order to include a full year's worth of QA data.

After reviewing the performance evaluation with the employee, signatures are obtained from all parties. A copy is provided to the employee and a copy is maintained in the employee's personnel file.

A copy of a blank performance evaluation is included in the appendix.

HUMAN RESOURCES MANAGEMENT
Promotion, Recognition, Discipline, and Termination
(COA: HR3; CSB: A12)

Policy:
Aspects of employment that influence promotion, discipline, and termination of employees conform to the personnel policies of Homefull.

Procedure:
Homefull will work to retain qualified and high performing staff by monitoring retention rates and conducting regular employee satisfaction surveys. Satisfaction surveys will be conducted electronically through an online survey system and results will be anonymous and collated for overall data use. Retention information is maintained by administrative staff and will be reviewed by the CEO at least annually.

Homefull will also employ methods to recognize staff achievement and contributions to the overall performance of the organization.

When an employee is moved into a different position/job description within Homefull, they will be evaluated in that role during a 90-day probationary period. If a salary increase applies, it will be included in payroll upon successful completion of the probationary period and will be paid retroactively to the start of the new position.

For most performance issues identified by supervisory and/or HR personnel, disciplinary action will take the following course: first performance issue will result in a coaching meeting with the direct supervisor and documented via a Coaching Memo for the employee's file; second performance issue will result in a Corrective Action possibly including HR; third performance issue will result in further consequence which may include demotion, reassignment of role, or termination. Performance issues may include, but are not limited to, not meeting productivity, poor performance on Chart Reviews, Code of Conduct violations, general policy breaches, etc.

HUMAN RESOURCES MANAGEMENT
Employee Problem Resolution Procedure

Policy:
Homefull recognizes that problems arise between co-workers and between workers and their supervisors and will institute a resolution procedure including a grievance procedure if needed.

Procedure:
Attempts to provide satisfactory resolution to staff problems are initiated as soon as problems become apparent. Employees will discuss problems with their immediate supervisor. If the supervisor is unable to solve the problem, he/she will review the issue with the CEO and/or human resources staff. If needed, a mediation meeting will occur with the involved staff.

When a problem is not resolved immediately, staff members may invoke Homefull's Employee Grievance procedure. The Grievance Procedure is described in the Homefull Personnel Policies.

HUMAN RESOURCES MANAGEMENT
Personnel Qualifications/Scope of Practice
(COA: HR2, HSCL2, RPM1)

Policy:
Client services, including assessment, community support, case management services, performed in the process of assisting Homefull's target population, are conducted either by a licensed, credentialed professional or trained professional. It is the responsibility of the CEO to assure that service providers provide only those clinical services allowed within the scope of their license or certification. It is the policy of Homefull that persons providing client services possess the appropriate credentials.

Procedures:
All members of the staff, or applicants seeking employment, must hold appropriate education degrees and/or must also have substantial work experience in a human services discipline as defined by the position requirement.

Direct client services of Homefull are provided and/or supervised by professionals with one or more of the following credentials according to the standards set forth in State of Ohio's Standards for Mental Health Treatment (5122-23):

Licensed Professional Clinical Counselor
Licensed Independent Social Worker
Licensed Psychologist
Licensed Physician
Licensed Social Worker
Licensed Professional Counselor
Trained Other – QMHS: requires 3 years of experience OR a related Bachelor's degree

Human Resources staff will verify all credentials/licenses of potential staff members through primary source verification prior to hire via the Ohio eLicense Center website: https://elicense.ohio.gov/OH_HomePage. Credentials/licenses will continue to be verified for all staff members on an annual basis while employed by Homefull.

Direct client services are provided by staff that have completed an initial orientation program and have been approved by the Clinical Director to provide the service.

HUMAN RESOURCES MANAGEMENT
Standards of Acceptable Behavior
(COA: GOV7, RPM1, CR1; CSB: A4)

Policy:
Professional staff is required to abide by the Codes of Ethics mandated by their certifying or licensing bodies. All employees are required to uphold the Clients Rights, as stated in the Client Rights and Grievances section of the Homefull Policy and Procedure Manual, as well as the standards of behavior outlined in Homefull's Personnel Policies and general code of conduct.

Procedure:
During orientation to Homefull, all new staff are made aware of the Ethical Codes of their licensing bodies, as well as Homefull's Client Rights and Homefull's standards of behaviors located in the Corporate Compliance Plan. All new employees are given a copy of these policies relating to standards of acceptable behavior and sign an acceptance form at time of orientation. Conduct in an employee's personal life that interferes with performance of the job, conflicts with the mission of the organization, involves criminal activity that impacts the integrity of the organization, or directly causes the organization to be in violation of any professional codes or compliance with accreditation can result in disciplinary action up to and including termination.

Conduct at all agency sanctioned events that include the presence of alcohol is also included in this policy. Staff are to conduct themselves responsibly at all agency sponsored events.

HUMAN RESOURCES MANAGEMENT

Staff Neglect and Abuse of Persons Served
(COA: ASE2)

Policy:

It is the policy of Homefull to attempt to reduce or eliminate the likelihood that consumers experience either abuse or neglect while they are affiliated with Homefull. Homefull has a zero-tolerance policy for any type of abuse of any clients, whether adult or child. In working with a vulnerable population, it is crucial that Homefull staff be aware of risks and contribute to an abuse/neglect-free environment. To achieve this objective, the CEO will ensure: 1) that staff receive education regarding abuse and neglect, 2) that the agency adheres to accepted protocols regarding the investigation, substantiation, reporting, and response to confirmed incidents of client abuse and staff neglect, and 3) that the agency has developed and implemented appropriate procedures to monitor and evaluate the incidence and outcomes of allegations of abuse and neglect. Types of abuse included are:

- **Physical Abuse** means knowingly causing physical harm to a person by physical contact with the person or by the inappropriate use of a physical or chemical restraint, medication, isolation of the person, and/or the use of cruel and unusual punishments and practices.
- **Sexual Abuse includes grooming, exposing children to sexual content, touching or engaging in physical/sexual contact with minors or adults in the care of Homefull, having sexually charged conversations, or other behaviors that are understood to be inappropriate for a caregiver relationship.**
- **Verbal Abuse** means knowingly causing emotional harm to a person through the use of inappropriate verbal interactions.
- **Gross Abuse** means knowingly causing serious physical harm to a person by physical contact with the person.
- **Neglect** means recklessly failing to provide a person with any treatment, care, goods, or service that are necessary to maintain the health or safety of the person when the failure results in serious physical harm to the person.
- **Gross Neglect** means knowingly failing to provide a person with any treatment, care, goods, or services which are necessary to maintain the health or safety of the person when the failure results in physical harm or serious physical harm to the person.
- **Fiscal Abuse** means the exploitation of the consumer for financial gain.

Procedures:

Training: All new hires and new volunteers will receive training on abuse prevention, specifically sexual abuse prevention, at orientation. Annually, employees of Homefull will complete a refresher training and review/sign an updated acknowledgment of said training and review of policy.

Investigation: All allegations of client abuse or staff neglect will be reported to and investigated by the CEO of Homefull, or designee. Investigations of complaints will proceed according to the

procedures listed below:

1. If a complaint is reported in person (by either the alleged victim or by a third party) an interview will be conducted and the information recorded on the client complaint form.

2. If a complaint is reported by telephone, the staff member who receives the complaint will record the information. The record must include a description of the allegation, the name(s) of the staff member(s) alleged to have committed the abuse or neglect, the names of any witness of the alleged abuse, and progress notes recording the status of the complaint throughout the investigation.

3. The complaint report will be signed and dated (including the time the complaint is reported) by the staff member who receives the complaint. The complaint report will be immediately (during the same working day in which the complaint is reported) forwarded to the CEO.

4. Investigations of alleged abuse or neglect will be conducted by the CEO of Homefull, or by the designee of the CEO.

5. The CEO will notify the appropriate municipal or county law enforcement agency of all information regarding the allegation during the same day the complaint is reported.

6. The CEO will consult the Board of Trustees within 24 hours after receipt of a complaint of abuse or neglect.

7. The alleged perpetrator(s) will be immediately removed from the service team of the alleged victim.

8. The CEO will collect statements of the alleged victim, the alleged perpetrator, and all witnesses that pertain to the complaint.

9. The CEO will be responsible for the collection, documentation, and protection of any evidence related to the complaint.

10. Only the CEO or his/her designee will be allowed access to the clinical records, complainant report, evidence collected during the investigation, or any other documentation regarding an allegation of abuse or neglect.

11. The alleged perpetrator will be prohibited from any involvement with the investigation of complaint.

12. The clinical record of the alleged victim will be sequestered by the CEO immediately after receipt of the complaint report form.

13. The Clinical Director will conduct a clinical review which will consist of examination of the alleged victim's case records within three working days after the receipt of a complaint.

14. If the complainant is a consumer of Homefull, the staff member who receives the complaint will obtain any necessary release of information to fully investigate the alleged incident.

15. Complaints can be brought by clients or by any third party that can be generally assumed to provide advocacy for clients, e.g., family members, spouses, other service providers, or another consumer of Homefull.

16. If the alleged abuse is reported by a third party, the staff member who receives the complaint will explain to that person that a release of information form must be signed by the consumer before an investigation is initiated.

17. If the allegation of abuse or neglect is made by a third party on behalf of a consumer and that consumer will not authorize an investigation by signing a release form, the CEO will terminate the investigation. The CEO will note on the initial complaint form that the agency's investigation was terminated.

REPORTING: The Ohio Revised Code (ORC) states that suspected abuse or neglect of clients who are receiving services from an alcohol or drug addiction or mental health program must be investigated. The CEO will investigate all allegations involving those specified groups.

In cases where abuse or neglect is suspected and where reporting is not required by statute, the CEO will ensure that a thorough and unbiased investigation of the complaint is completed and that the results of that investigation are submitted to the local ADAMHS Board or appropriate mental health oversight body.

In cases involving abuse or neglect among children under the age of 18, reports are made to the Children's Services Board or to a local law enforcement agency.

When abuse or neglect occurs to adults over the age of 60, reports are made to the Department of Human Services, Adult Protective Services.

When the alleged victim is a person with a MR/DD diagnosis, either the local MR/DD Board or a local law enforcement agency will be notified.

In cases where the alleged victim is a resident of an adult care facility which is licensed by the Ohio Department of Health, abuse or neglect will be reported to either the Director of Health or to the state or regional long-term care facility's ombudsman.

In addition, consumers, consumers' advocates, or staff members of Homefull may also report any alleged abuse or neglect to the Ohio Legal Rights Service.

If an investigation substantiates an allegation of abuse or neglect by a member of the staff of Homefull, the CEO will notify the licensing or credentialing board that has afforded professional recognition to that staff member.

The results of investigations of abuse or neglect will be securely maintained by the CEO for a period of five years.

Training: Training staff members to recognize indications of abuse and neglect and to initiate appropriate responses to reported abuse and neglect is a primary responsibility of the CEO.

At time of hire, all Homefull staff will receive a copy of Homefull Staff Neglect and Abuse of Persons Served Policy and will sign a form indicating their receipt of said policy and their agreement to abide by said policy. This will become a part of each staff member's personnel file.

HUMAN RESOURCES MANAGEMENT
Personnel Management/Availability of Policies and Procedures
(COA: RPM1, CSB: A12, E1)

Policy:
Homefull's Personnel Policies are always available to the Homefull staff and a receipt of acknowledgement is signed upon new hire.

Procedures:
At new hire, staff will be presented the personnel policies during orientation. New employees will sign acknowledgement of having received and reviewed these. Electronic or hard copy signatures will be maintained in the personnel file.

A copy of the Homefull Personnel Policies is located at Homefull in the Admin office. In addition, each staff member has access to the electronic version of the manual via Homefull's shared HR Dropbox folder.

Changes to the Homefull Personnel Policies are initiated by Homefull's CEO. Revised copies of Policies and Procedures are distributed to all staff, including supervisors, by Homefull's CEO once the revisions have been approved by the Board of Trustees. When changes are presented to staff, they will sign an acknowledgement that the edited/newly added policies were reviewed.

HUMAN RESOURCES MANAGEMENT
Position Descriptions
(COA: HR5; CSB: A12)

Policy:
Homefull shall have a position description for each staff member.

Procedure:
Position descriptions will include at least the following:

X Job title
X Position of supervisor
X Duties/responsibilities
X Minimum qualifications for the position
X Credentials and academic requirements, if applicable
X Signatures of staff member
X Signature of supervisor

New employees receive a copy of their job description at orientation and will sign a copy for their personnel records. Position descriptions will be reviewed with employees and updated as necessary to reflect current functioning within the organization.

HUMAN RESOURCES MANAGEMENT
Staff Development
(COA: HR3, TS1)

Policy:
The development of professional skills, practices, and attitudes is necessary in order to enhance delivery of effective and appropriate services to the clients of Homefull. Establishment and improvement of professional competencies include the provision of orientation, training, and career development.

Procedure:
New Staff of Homefull attend an orientation and complete a number of training activities with their supervisor.

Staff of Homefull are then eligible to participate in the training and development seminars and programs offered by Homefull. In some cases, staff may earn Continuing Education Units for attending credentialed trainings. Additionally, staff members are required to complete the minimum contact hours to acquire and satisfy the continuing education requirement for maintenance of their state licenses and certifications; such necessary education/training is paid for by Homefull. Documentation of training and continuing education shall be placed in the employees' personnel file.

Internally, the program strives to provide educational opportunities on a regular basis by scheduling trainings on topics of interest. These include staff presenting on outside seminars that they have attended as well as professionals from outside agencies presenting information to the staff at Homefull.

Staff is encouraged to submit ideas for in-service training at all times. The CEO will assign a staff member to be responsible for developing and coordinating a training schedule and arranging for outside speakers. In addition, as a component of each staff member's annual performance appraisal, goals and objectives for educational development are discussed and agreed upon with their supervisor.

The orientation outline will be reviewed annually for updates.

Competencies for supervisory roles will be established and trainings will be offered for development of these competencies for identified staff. The supervision process helps to identify development needs.

HUMAN RESOURCES MANAGEMENT

Personnel File Maintenance

(COA: HR5, HR7)

Policy:

Homefull complies with legal records maintenance requirements. Former Homefull employee personnel files and all files for current volunteers, interns, or independent contractors are maintained by Homefull in a locked cabinet; executive staff files are maintained in a separate locked cabinet. Current employee personnel files are maintained electronically via an online database/payroll system. Files for all independent contractors, volunteers, and interns are conserved the same as employee files with the exception of benefits related and employee-only items. Employee information and personal data is originally collected from each individual at the time of employment, and shall be periodically verified or updated as necessary or as required by Human Resources. The employee is responsible for promptly notifying Human Resources personnel of any change in personal data. In accordance with the provisions of the Privacy Act of 1974, the Agency will release information contained in personnel files to authorized users only on a "need to know" basis.

Procedure:

The applicable personnel policies and procedures are contained in Homefull's Personnel Policies which are maintained via Dropbox in a folder accessible to all staff. All new employees, independent contractors, volunteers, and interns are provided a full copy to read at orientation. The personnel file on each employee shall contain, but not be limited to, the following and shall be in place prior to the delivery of services to person served or to the organization and throughout employment:

- Resume for all service providers and service supervisors
- Form I-9, verification of citizenship and employment eligibility (maintained in Homefull's online payroll system as the primary HR record)
- Copy of notification of hiring, to include starting date, position, and starting salary
- Verification or copies of credentials of service providers
- Verification or copies of academic degrees of service providers and ongoing confirmation of credentialing status
- Documentation of employee reference check
- Job description
- Annual performance evaluation
- Documentation to reflect that the employee has either received a copy of the personnel policies and procedures or has had them explained
- Documentation of employee orientation
- Documentation to reflect that the employee has received a copy of the Client Abuse and Staff Neglect Policies, Client Rights Policies, and Client Grievance Procedures
- Documentation of Continuing Education (if applicable)
- Appropriate policies as applicable to positions Salary or pay rate information
- Disciplinary actions

Personnel files will be stored for seven years following the employee's separation unless otherwise required by federal, state, or local law or regulatory agency. An employee may review and receive a copy of his/her personnel record upon request to his/her supervisor.

HUMAN RESOURCES MANAGEMENT
Review of Records
(COA: HR5, RPM1)

Policy:
Homefull takes all necessary steps consistent with Chapter 1347 of the Ohio Revised Code to ensure that employee's records are maintained in a manner to protect the privacy of personal information.

Procedure:
Personnel records of the Homefull staff are available to employees or a designated representative of the employee according to the conditions described in the Homefull Personnel Policies.

All personnel practices of Homefull including those governing fair employment practices, are in compliance with the local, state, and federal laws and regulations.

Applicants seeking employment with Homefull are informed of the rules and regulations that govern the employment practices, right to privacy, and extent and limitations of confidentiality, as these issues affect the hiring process and employment.

HUMAN RESOURCES MANAGEMENT
Fair Employment Practices
(COA: RPM1)

Policy:
Homefull follows the rules and regulations governing fair employment practices. See Homefull's Personnel Policies for more detail.

HUMAN RESOURCES MANAGEMENT

Paying Employees

(COA: RPM1)

Policy:

Compensation and salary programs are administered in accordance with the intent of the various state and federal laws addressing the issues of compensation.

Procedure:

The specific payroll procedures are detailed in Homefull's Personnel Policies.

HUMAN RESOURCES MANAGEMENT
Overtime
(COA: RPM1)

Consistent with the Department of Labor's Fair Labor Standards Act, all employees with a salary under $35,568 will be considered non-exempt. These staff are primarily hourly paid at Homefull and will be eligible for overtime pay. The specific procedures for overtime are detailed in Homefull's Personnel Policies. The Agency has established guidelines for the payment of overtime compensation for non-exempt employees in compliance with government regulations.

Procedure:

- All overtime must be authorized by management prior to actually being worked. In the rare emergency situation in which overtime is unavoidable, flex-time within the same week will be utilized when possible.
- All hours worked in excess of 40 are compensated at 1.5 times the hourly rate. Employees must actually work 40 hours in a one-week period in order to be eligible for overtime compensation. Designated holidays, company designated emergencies, vacation, jury duty, and bereavement leave are included for purposes of calculating hours worked per week but not for overtime pay. Additionally, all hours spent attending work-related lectures, meetings and training programs during normal working hours are also eligible for overtime compensation.
- Compensatory time off for non-exempt employees is not permitted under Wage and Hour Laws except if taken in the same week in which the overtime occurs. Managers do not have the discretion to award compensatory time off under any other circumstances.
- Employees who exceed 40 hours a week without prior authorization and/or without reporting an emergency situation demanding overtime work may be disciplined in accordance with the disciplinary process for performance issues.

HUMAN RESOURCES MANAGEMENT
Time Off
(COA: HR3)

Policy:
Homefull will maintain time off policies as part of the formal Personnel Policies. This will include policies for vacation, sick, and holiday leave as well as bereavement, military, and other causes for time away from work. Vacation and sick time will be included in one pool for Paid Time Off.

Procedure:
Homefull staff are awarded paid time off (PTO) benefits based on length of service. In addition to vacation time, PTO is designed to cover leave for personal sickness, family sickness, family activities and extra holiday time. Employees may find they need time away from work prior to accruing the hours necessary. In such cases and under special circumstances, with prior approval of the supervisor and HR personnel, an employee may build up a negative balance. Employees will accrue time off based on the following length of service chart:

Years of Service	hours earned per pay period	total days earned per year
0-5 years	4.61 hours	15 days
5-10 years	6.15 hours	20 days
10-16 years	9.23 hours	30 days
16+ years	10.76 hours	35 days

In general, PTO requests must be preapproved and prescheduled with a 2-week notice. In the event of sudden illness or emergency, a “call off” of less than 24 hours’ notice is allowed. Unscheduled PTO (i.e. call offs) exceeding more than 2 consecutive days will require a doctor’s note and in some cases a return to work letter. In the case where PTO is requested for a day preceding and following a holiday, aka the holiday is “sandwiched” by PTO, the holiday then becomes PTO time as well, deducting from the employee’s available PTO balance.

In the event the employee is scheduled to work on a holiday but a call off occurs, the time for that day is assigned as PTO.

A maximum of 40 hours of accrued but unused PTO time may be carried over from one calendar year to the next (for employees over 10 years of service, the cap is 80 hours). Exceptions to the carryover policy will be subject to HR personnel discretion. Employees will not be able to "sell" unused PTO hours back to Homefull. If employment is terminated for any reason, the employee will be paid for all *earned and unused* PTO time. Final paychecks will include deductions for any negative balance upon termination.

Other types of time off, including federal FMLA benefits are detailed in the Personnel Policies section.

HUMAN RESOURCES MANAGEMENT
Volunteer Time Off
(COA: HR3)

Policy:
In order to acknowledge and encourage employee interest in contributing to the larger community beyond the impact of Homefull's direct work, Homefull will maintain a Volunteer Time Off (VTO) policy as a subsection in the Paid Time Off (PTO) section of the Personnel Policies. Regular, benefits eligible employees in good standing can use the VTO policy subject to supervisor and CEO approval.

Procedure:
Full time, benefits eligible, employees who have been actively employed for a minimum of 6 months may request up to 24 hours (or 3 work days) of VTO per calendar year using the VTO request form. Volunteer activities conducted under VTO should be under the direction of a recognized non-profit organization or public school. The activities cannot directly benefit the employee's family members, meaning as a recipient of the services. Categories may include but are not limited to: environmental causes, food insecurity, health, foster care, and/or educational programs. Examples of activities not eligible for VTO include but are not limited to: parent/teacher conferences, activities conducted during scheduled PTO, and/or coaching a sports league.

The balance of VTO hours will be available each calendar year at the start of the year. Unused hours cannot be carried over or added to previous years.

The request must include an attachment with information about the agenda if an organized activity or information about the organization. A request form is included in the appendix of the full policy manual. The request must be approved by a supervisor prior to submission to HR for final approval.

Other types of time off, including federal FMLA benefits are detailed in the Personnel Policies section.

HUMAN RESOURCES MANAGEMENT
Administrative Leave

Policy:
Administrative leave temporarily relieves an employee of their normal job responsibilities. The employee is asked to remain at home during regular (up to 40) work hours but continues to be maintained as active employment status, meaning they receive regular pay (up to 40 hours) and benefits. Administrative leave employees are still considered on duty so they must be available during their regularly scheduled workday if deemed necessary.

An employee may be placed on an Administrative Leave, with or without notice, for the following circumstances, including but not limited to:

Administrative Investigation:

- Administration to review/investigate a claim involving the employee
- To secure particularly sensitive information or resources if warranted by the circumstances
- To prevent disruption in the workplace and maintain a professional environment
- To investigate allegations of misconduct

Misconduct not requiring termination that may also require investigation:

- Dishonesty, theft or misappropriation of company funds or property
- Violence on the job
- Gross safety, negligence or acts endangering others
- Insubordination
- Any other conduct that warrants removing the employee from the worksite.

Whistleblowers:

- To protect an employee who has reported misconduct or illegal activity from potential retaliation
- In the event an employee is reporting retaliation for reporting activities

Behavioral Health:

- If the employee exhibits suicidal ideation, statements, or attempts at the workplace
- If the employee's use of drugs or alcohol overlaps with the workplace including inebriation at work and/or use at work and/or interrupted work due to attendance or other drug use behaviors
- To remove an employee from the workplace who is behaving disruptively (pending an assessment of the situation)

A time frame would be established at the time of commencement of Administrative Leave that allows for above circumstances to be addressed.
Should an employee need further leave, other policies may be utilized including disability leave

and/or FMLA based on the situation.
Administrative Leave vs Suspension: While the two may seem similar, there are minor differences between an administrative leave and a suspension.

- A suspension may be paid or unpaid depending upon the circumstance and severity of the infraction. Since a suspension is usually a form of a disciplinary action, it is usually unpaid as the employee's work hours during that time period are discounted and they are not entitled to be paid for that period.
- An administrative leave generally occurs during an investigative period and will be paid as you are expected to be available to work during your regularly scheduled workday(s).

Procedure:
The CEO and COO, in collaboration with Human Resources (HR), may place an employee on Administrative Leave for periods not to exceed 15 calendar days to review or investigate actions of the above-stated situations. The employee will be informed that he or she is being placed on Administrative Leave, advised whether leave is paid or unpaid, the reason for the Leave and whether the Leave involves an investigation. Homefull property may be collected at this time (e.g., keys, electronic equipment, files, records, temporary suspension of remote access privileges, etc.) and appropriate disabling of technology accounts will be conducted (e.g. phone, email, etc.).

The Administrative Leave must be confirmed in writing to the employee no later than two (2) working days after the Leave commences. This written notice must explain the reasons for the Administrative Leave, state the expected length of the leave, and request the employee to remain available during the leave to participate in investigative interviewing if needed. A copy of the letter will be placed in the employee's personnel file. At the conclusion of an investigation if required, and pending the outcome of the investigation, a decision will be made whether to retain this letter in the file or to remove it.

Investigations - The CEO, COO, and HR Team will conduct, or appoint a person to conduct, a prompt and thorough investigation of the circumstances for claims of wrongdoing, violations of harassment policies, or potential unethical or illegal behaviors. Upon conclusion of the investigation, the CEO will determine if the employee will be reinstated, subject to disciplinary action, or terminated from employment. The employee will be informed of the decision in writing.

An appeal request related to this action should be in writing and addressed to the CEO; it should include the reasons for the appeal request and a requested course of action.

Behavioral Health – any Administrative Leave related to the employee's urgent need for behavioral healthcare will carry the requirement of the employee seeking an assessment, following the recommendations of the assessment, and providing verification that an assessment

was completed to Homefull's HR Team. A return from Administrative Leave for behavioral health reasons requires a statement from a licensed provider that the employee is fit to return to work. If the provider deems that further leave is necessary, Homefull will engage the Disability Leave policy for any further period beyond the Administrative Leave specifically for seeking a behavioral health assessment and treatment plan.

HUMAN RESOURCES MANAGEMENT
Retirement and/or Annuities

Policy:
The Homefull staff are awarded retirement benefits as described in Homefull's Personnel Policies. Homefull maintains a match program as part of this.

PROGRAM ADMINISTRATION AND SERVICE ENVIRONMENT

CEO Job Description
Qualifications

Policy:
Homefull will have a CEO who is responsible for the day-to-day operations of the organization.

Procedure:
The CEO is responsible to the Board of Trustees.

The day-to-day operations of Homefull are supervised by the CEO. The CEO's responsibilities include, but are not limited to, the following:

- Implementation and coordination of policies and procedures
- Budget preparation and monitoring
- Monitoring of all Program activities
- Informing the Board of Trustees of all pertinent issues, especially those related to Quality Assurance
- Hiring and Firing of staff
- Public relations and marketing functions of the program
- Supervision of the program's staff

The qualifications of the CEO will include the following: Bachelor's degree and 1) a minimum of 5 years' experience in an allied health profession to include a minimum of 2 years as a supervisor or 2) a minimum of 5 years business administration experience to include a minimum of two years as a supervision and 3) a minimum of 5 years with leadership/supervisory responsibilities at a social service organization and/or homeless serving organization.

PROGRAM ADMINISTRATION

Risk Management Assessment

(COA: RPM1, RPM2, RPM6, ASE1, BSM1, CR2)

Policy:

Homefull will engage in a Risk Management Assessment conducted at a minimum of once a quarter. Based on the results of this assessment, Homefull will develop a written Risk Management Plan and incorporate it into Homefull's Strategic Plan. Risk areas discussed will include: legal compliance, insurance and liability, health and safety, human resources practices, contracting practices and compliance, client rights and confidentiality issues, financial risks, and conflicts of interest.

Procedure*:*

The CEO ensures that risks are actively identified, analyzed, and managed annually. Risks will be identified as early as possible so as to minimize their impact. The steps for accomplishing this are outlined in the following sections.

RISK IDENTIFICATION

Risk identification will involve the project team, appropriate stakeholders, and will include an evaluation of environmental factors, organizational culture and the Quality Assurance Plan.

Methods for Risk Identification

The following methods are used to assist in the identification of risks associated with Homefull

- Brainstorming
- Interviewing
- SWOT (Strengths, Weaknesses, Opportunities and Threats)
- Historical Data
- Trends
- QA

A Risk Management plan with updates will be generated and updated as needed and will be stored electronically in the administrative offices of Homefull.

RISK ANALYSIS

All risks identified will be assessed to identify the range of possible outcomes. Risks will be prioritized by their level of importance.

Qualitative Risk Analysis

The Capability, PR, Cost, and Schedule Factors are assigned a Magnitude of possible occurrence for each identified risk and assessed by the CEO, with input from the staff and Board of Trustees using the approach as outlined in the following table:

Risk Analysis Calculation Table				
Magnitude	Capability Factor	PR Factor	Cost Factor	Schedule Factor
0.1 Low	Minimal or no consequences	Occasional harsh media	Cost estimates not exceeded, some transfer of money	Negligible impact on other schedules, changes compensated by available slack
0.3 Moderate	Small reduction (10% requirements not met)	Investigative body	Cost estimates exceed budget by 1%-5%	Less than 1 month slip in schedules, small adjustments
0.5 High	Some reduction (25% requirements not met)	Unfavorable public opinion	Cost estimates increased by 5%-20%	Schedules slip in excess of 3 months, a few projects are shelved
0.7 Significant	Significant reduction (50% requirements not met)	Budget cuts as political retribution	Cost estimates increased by 20%-50%	Schedules slip up to 12 months, many projects are shelved
0.9 Catastrophic	Goals cannot be achieved	Severe pressure to replace key officials	Cost estimates increased in excess of 50%	Schedules slip more than 12 months, most projects are shelved

RISK RESPONSE PLANNING

Each major risk will be assigned to the appropriate staff for monitoring and controlling purposes to ensure the risk will not "fall through the cracks."

For each major risk, one of the following approaches will be selected to address it:

- **Avoid** – Eliminate the threat or condition or to protect the project objectives from its impact by eliminating the cause
- **Mitigate** – Identify ways to reduce the probability or the impact of the risk
- **Accept** – Nothing will be done
- **Contingency** –Define actions to be taken in response to risks

- **Transfer** – Shift the consequence of a risk to a third party together with ownership of the response by making another party responsible for the risk (buy insurance, outsourcing, etc.)

For each risk that will be mitigated, Homefull will identify ways to prevent the risk from occurring or reduce its impact or probability of occurring. Any additional risks that result from risk mitigation response will be addressed.

For each major risk that is to be mitigated or that is accepted, a course of action will be outlined to minimize its impact in the event that the risk does materialize.

RISK MONITORING, CONTROLLING, AND REPORTING

Risks will be tracked, monitored, and controlled. A report on the status and effectiveness of each risk response action will be made to the Board of Trustees annually by the CEO. More detail and examples can be found in the CEO's Board Reports and in the Program Managers Meeting minutes.

The Risk Management Plan will also include an annual review of the insurance package of the agency. Homefull insurance including property, liability, and other relevant coverage, will be reviewed for adequacy and to ensure its ability to protect the agency's assets. Any significant changes will be analyzed for their possible impact to the agency. The Board will be notified of important changes to risk status as a component to the CEOs Report as needed or annually.

The CEO will:

- Review, reevaluate, and modify the probability and impact for each risk item. Analyze any new risks that are identified and add these items to the risk list.
- Monitor and control risks that have been identified.
- Help develop the risk response and carry out the risk response, if a risk event occurs.
- Participate in the review, re-evaluation, and modification of the probability and impact for each risk item annually.
- Identify and participate in the analysis of any new risks that occur.
- Inform the Board of Trustees on any issues/problems that: significantly impact the organization, require action prior to the next review, and when a risk strategy is not effective or productive causing the need to execute a contingency plan.

Risk activities will be recorded in the Risk management Plan Grid as needed.

RISK CONTINGENCY BUDGETING

A risk contingency budget can be established to prepare for the possibility that some risks will not be managed successfully. The risk contingency budget will contain funds that can be tapped in the event of an emergency.

There is a total of $**50,000** in Homefull's line of credit that can be allocated for Risk Management activities. These activities may include, but are not limited to, identifying, analyzing, tracking, controlling, managing, and planning for risks. This also includes creating and updating the risk response strategies and contingency plans.

TOOLS AND PRACTICES

A Risk Management Plan Grid will be maintained by the CEO and will be reviewed at a minimum annually with the Board of Trustees. Risk activities will be recorded in the Board of Trustees Meeting Minutes.

CLOSING A RISK

A risk will be considered closed when it no longer presents itself as a possible risk:

- Risk is no longer valid
- Risk Event has occurred
- Risk is no longer considered a risk
- Risk closure at the direction of the CEO

The CEO is responsible for implementing and coordinating the Risk Management Plan under the supervision of the Board of Trustees. The CEO will conduct a regular review of potential risks at a weekly meeting with Program Managers. The CEO will report any updates on the Risk Management Plan in her regular report to the Board of Trustees.

PROGRAM ADMINISTRATION AND SERVICE ENVIRONMENT
Risk Management Quarterly Review
(COA: RPM2, PQI 6)

Policy:
As an organization committed to continuous quality improvement, Homefull will engage in regular risk management reviews in multiple ways, engaging multiple levels of staff and stakeholders.

Procedure:
Homefull has developed various risk management practices in order to effectively gauge potential risks and/or risk areas. The QA Committee includes risk management as a regular agenda item which includes Mortality Reviews (including any former client up to 90 days post exiting Case Management), Critical MUI Reviews (include recommendations for best practices), monitoring visits or audits, grievances, and records requests among other topics. The Board of Trustees reviews key risk management areas at each meeting as reported in the CEO report. The Health & Safety Committee also regularly reviews risk management areas at each meeting including physical plant issues, program safety concerns, and training needs including CPR/First Aid and Right Response.

Quarterly, a Performance Dashboard Report is compiled that contains key indicators of Homefull's health as an organization; Risk Management is one section of this Dashboard Report. The Dashboard indicators are discussed and analyzed by the QA Committee, the Board, and the Executive Team quarterly. Improvement Plans are made as well as recognition of high performing areas.

PROGRAM ADMINISTRATION
Scope of Practice and Legal Compliance
(COA: GOV7, RPM1, HSCL2)

Policy:
Direct service providers of Homefull do not practice outside of their scope of practice as defined by their various credentialing or licensing boards. Homefull will pursue licensure or certification when it applies.

Procedure:
Direct service providers who are certified or licensed to practice in the State of Ohio will maintain their active status while employed by Homefull. Certified or licensed service providers will adhere to the regulations regarding the limitations of service and practice as described by the rules and codes of their regulatory agency or board. Direct service providers not maintaining an active licensure or certification (when required) while employed with Homefull may be subject to discipline as outlined in personnel section for discipline process.

Homefull will maintain and post any appropriate licensure or certification for the organization.

PROGRAM ADMINISTRATION
Risk Prevention/Protection of accused staff
(COA: GOV7, RPM2, RPM3; CSB: A2)

Policy:
Homefull will provide, and assume the cost of, legal assistance to personnel against whom claims are made related to lawful, authorized actions taken within the course and scope of their duties.

Procedure:
In the event that a Homefull staff member is accused of a violation of a client's rights and/or accused of a criminal act and it is the organization's opinion that the staff member is not guilty of the accusations, legal assistance will be sought on behalf of that staff member.

This does not apply when the organization (i.e. CEO and Board of Trustees) believes that the employee has committed unlawful acts or acts that are not conducted in the course of, or in furtherance of, their employment. Furthermore, Homefull may refrain from providing legal assistance to an employee if Homefull's legal counsel determines that doing so would be a conflict of interest.

PROGRAM ADMINISTRATION

Behavioral Intervention Risk Assessment

(COA: ASE2, BSM1, BSM2, BSM3, BSM4, BSM5, BSM6, TS1, TS2, MHSU3)

Policy:

Homefull will proactively engage in a Behavioral Risk Assessment when a client/household presents threatening behavior that could result in personal self-harm or harm to others.

Procedure:

The Clinical Director ensures that risks are actively identified, analyzed, and managed. Risks will be identified as early as possible to minimize their impact. The steps for accomplishing this are outlined below.

Methods for Risk Identification

- Clinical supervision with program staff,
- one-on-one staff supervision,
- intervention involving client and support staff
- caseload review,
- Major Usual Incident (MUI) assessments, and
- Community partner case conferences.

Methods for Risk Analysis

- Historical behavior
- Assess through immediate case management appointment with client/household
- Health and Safety of client
- Health and Safety of other parties i.e. staff, program participants, etc.

Response to Potential Risks

1) Case Manager and/or Program Coordinator notifies their Program Manager
2) Create a safety plan for the client/household as well as for other parties
3) Notify and brainstorm next steps with the Director of Administrative Services
4) Notify and brainstorm next steps with the Clinical Director
5) Share plans and additional warning signs with program/agency staff
6) Alert Right Response Program Manager(s) for input and intervention
7) Request intervention and support from Crisis Now or Net Care and/or the local Police Department

PROGRAM ADMINISTRATION
Medication Control
(COA: PRG3)

Policy:
Homefull does not prescribe, dispense, administer, or store medication.

Procedure:
Employees of Homefull are not authorized to prescribe, dispense, administer, or store medication. Employees are directed to refer clients in need of medication to our community partner, the Samaritan Homeless Clinic. For clients currently in shelter and possessing medication, Homefull employees can refer to St. Vincent's shelter staff.

PROGRAM ADMINISTRATION

Information Management and Security

(COA: RPM4, RPM5, PRG4; CSB: A7, M1, M2, M3, M4, M5, M8, M14, M19)

Policy:

Homefull maintains a large and growing body of documents and data stored exclusively in electronic form. Much of this electronic data is critical to the operation of the organization and as such Homefull implements back up procedures and loss protection measures. Homefull follows all federal HIPAA guidelines in order to protect all client records and private information.

Homefull collects client information for billing, housing, and case management purposes regarding socio-demographic information and other services provided by Homefull. As a policy, Homefull utilizes the Homeless Management Information System (HMIS) as operated by the oversight body of the area in which we provide services. Only data related to the person's homelessness experience, provision of support services including mental health and substance use treatment, and housing information should be maintained in the client record. Client permission is confirmed prior to HMIS data entry and is maintained on the appropriate release of information form for the HMIS platform being used and is stored in the HMIS client record.

Procedure:

Homefull will utilize the appropriate HMIS client information database for the service area. Staff utilizing HMIS will attend specific training and will follow all policies and procedures as instructed. Homefull staff receive training at orientation both internally and externally (by the assigned HMIS management group) and then annually on confidentiality and HIPAA that will apply to all management information systems. Questions or issues with HMIS are addressed to Homefull's internal HMIS administrator, assigned by the CEO.

HMIS is accessible at all sites by all staff that are trained to use it with password protected access granted to employees who attend official training. Additionally, a shared documents file provides access on all staff computers to frequently used forms for clients and personnel matters. All computers, including desktops, laptops, and iPads are password protected and timed for log out due to inactivity. Logging into HMIS has additional password provided by oversight bodies. Data collection notices are posted at all program sites where staff meet with clients and information is recorded into HMIS.

Homefull's quality assurance process includes a variety of HMIS data reviews. Monthly and quarterly reviews of data to confirm accuracy and completeness are completed in addition to regular chart reviews of random client records in each program. The Compliance Team communicates with program management staff to ensure follow up is completed when needed. All required HMIS QA reports are completed and submitted either to the local oversight body or direct to HUD based on the grant.

It is the policy of Homefull to create and maintain client records that, in addition to their primary intended purpose of client care use, will also serve the business and legal needs of Homefull. It is the

policy of Homefull to maintain client records such that their integrity will not be compromised and they will support the business and legal needs of Homefull.

In order to protect original business critical data against loss or destruction, Homefull has created practices for general email and computer data beyond client data in HMIS. Since 2014, Homefull utilizes cloud technology for storage (Dropbox for Business) of all business materials. All client data should be stored solely in HMIS and not on an individual computer or cloud account. Dropbox Business Security White Paper is included in this Appendix. This paper contains information about Dropbox's security and privacy features and details how Dropbox manages vulnerabilities. Dropbox utilizes a third-party auditor to ensure their systems and controls are of high standards for security. The Dropbox Privacy Policy is copied verbatim in the Appendix.

PROGRAM ADMINISTRATION

Use of Artificial Intelligence (AI)

(COA: RPM4, RPM5, PRG4; CSB: A7, M1, M2, M3, M4, M5, M8, M14, M19)

Policy:

As the use of artificial intelligence tools in the workplace has increased dramatically, Homefull is establishing policy to provide guidelines for the ethical, secure, and effective use of Artificial Intelligence (AI) tools as it relates to Homefull's work. This policy aims to enhance service delivery and administrative efficiency while maintaining the protection of client privacy and organizational information, including financial data as a high priority as well as maintaining professional standards and complying with applicable laws. This policy applies to all uses of AI tools, including but not limited to:

- Text generation (e.g., reports, emails, case notes)
- Data analysis and summarization
- Chatbots or virtual assistants
- Image, audio, or video generation
- Approved systems used for financial operations (e.g., Sage Intacct) are permitted in accordance with agency financial controls and procedures.

AI tools should not be used unless approved by Homefull for limited use as defined below. Protecting data and client information is of the utmost priority for Homefull as signified through this and other information management and data protection policies. A quick guide for staff will be added to the Appendix of this manual.

Procedure:

Definitions:

- Artificial Intelligence (AI): Software systems that perform tasks typically requiring human intelligence (e.g., writing, summarizing, analyzing data).
- Sensitive Information: Includes any personally identifiable information (PII), protected health information (PHI), or confidential client data.

Guiding Principles:

AI is a support tool; it is not a replacement for professional judgment. In addition to this policy being policy of Homefull, each staff member is responsible for ensuring that AI use aligns with:

- Client confidentiality and dignity
- Accuracy and accountability
- Equity and non-discrimination
- Transparency in decision-making
- Human oversight in all client-related matters

AI usage by Homefull staff must not violate HIPAA or general confidentiality and must not mislead or create false content.

Key Legal Requirements:

- Client records that identify individuals receiving behavioral health or social services must be kept confidential and cannot be disclosed without consent, except in limited circumstances as explained in training with staff.

- Ohio law requires agencies to control access to confidential personal information and regulate how it is stored and shared, including electronic systems. This policy is Homefull's mandate to employees to ensure confidentiality of all PHI.
- Staff access to client records must be limited to what is necessary for job duties, and information must be protected from unauthorized disclosure.
- Confidential information must be securely maintained and destroyed when no longer needed, in accordance with state rules and with other policies contained in this policy and procedure manual.
- Financial and banking information must be treated as confidential and protected from unauthorized disclosure or use.

In addition to general prohibitions, staff must not:

- Use AI to make final decisions about client eligibility, services, or safety;
- Represent AI-generated content as solely human-created when disclosure is required;
- Enter any identifiable client information into AI systems that are not explicitly approved and secured under agency policy. This includes but is not limited to:
    - Names, initials, birthdates, Social Security numbers;
    - Case notes, assessments, or service histories;
    - Information that could reasonably identify a client; under Ohio law, even indirect identifiers tied to services (mental health, housing, SUD, etc.) are considered confidential and protected.
    - Use unapproved AI tools in connection with financial transactions, banking information, or financial decision-making without explicit authorization;

Acceptable Uses:
Within Homefull's programs or businesses, AI tools may be used for:

- Drafting general communications (emails, memos, policies);
- Brainstorming ideas or program improvements;
- Summarizing non-confidential information;
- Creating templates or forms;
- Drafting narrative grant reports;
- Training and educational purposes.

All AI-generated documents must be reviewed for accuracy and edited by human staff to ensure that the quality and accuracy is at the level expected within Homefull. Staff are responsible for ensuring AI-generated documents do not violate Homefull policy in other ways, violate confidentiality, or conflict with Homefull's mission or values including but not limited to the reinforcement of bias, showing a lack of integrity, limiting the inclusiveness of all voices, and showing disrespect or lack of dignity to all persons.

Violations:
If any Homefull employee suspects inappropriate use of AI or witnesses a violation of client PHI disclosure policies, this breach of data should be reported to Homefull administration immediately. Violations of this policy may result in disciplinary action, up to and including termination

PROGRAM ADMINISTRATION
Technology Acquisition
(COA: PRG4, RPM4, RPM5, CSB: D9, E1)

Policy:
Homefull and its contracted IT Support Vendor is responsible for acquiring and maintaining all hardware and software products purchased with organizational funds. Through normal operational means, Homefull replaces certain hardware on a regular basis, and maintains an Inventory on all products that meet the organization's needs through the use of Asset Tag. The purpose of this policy is to define the process by which additional hardware and software products are reviewed, purchased and maintained, with respect to data security, operational integrity, and long-term sustainability. Homefull and its contracted IT Support Vendor will neither install nor support hardware or software that has not been approved in advance of purchase.

HARDWARE
Computer hardware includes desktop computers, laptop/notebook computers, tablet computers, i-pads printers, copiers, telephones and other computing and peripheral devices. All staff must contact Homefull's IT Staff for any desire/need for computer hardware purchases that have not already been identified as in need of a replacement. Homefull and its contracted IT Support Vendor will request quotes from vendors, manage the equipment purchase, setup and then install and support the new hardware. Upon acquisition of any hardware Homefull will add equipment to the inventory and assign an Asset Tag.
In some cases, and depending on the intended use, Homefull and its contracted IT Support Vendor may have suitable refurbished hardware on hand that will meet the current need. Please consult with Homefull and its contracted IT Support Vendor for additional information. Computer hardware that is not acquired through Homefull will not be supported. Due to licensing and warranty restrictions, Homefull will not install agency owned software on a non-approved device, nor will Homefull and its contracted IT Support Vendor perform physical repairs to the device.

SOFTWARE
Homefull provides a standard computer software package for all new computers. This package creates a consistent technology environment that is secure, compliant with all licensing and usage agreements, and meets the general requirements of the agency. Specialized needs may require the acquisition of additional software. Homefull maintains video meeting accounts for use with remote staff and staff in various geographic areas of Homefull's service regions.

Procedure:
Software/Hardware and vendor services review:

- Homefull and its contracted IT Support Vendor must be included in all software/hardware acquisitions to ensure compliance with the agency infrastructure.
- Homefull and its contracted IT Support Vendor will ensure that the software/hardware meets all operational requirements including server configurations, operating systems, and auxiliary

or third-party software products (browser compliance, Java version, etc.) as well as the user needs.

- In addition to the software/hardware, Homefull and its contracted IT Support Vendor will also review data hosting and/or storage services, whether data is hosted internally or by the vendor (or a cloud agent acting on behalf of the vendor).
- Homefull and its contracted IT Support Vendor will assess the level of internal support necessary for continuous operation, and the support services that are either provided by or will need to be purchased from the vendor.

Vendor compliance:

A. All vendors that provide cloud-based services must meet acceptable industry security standards as required by Homefull.
B. The software/hardware under review must provide a high-quality service that improves our technology environment without jeopardizing network or server performance, data integrity or data security.
C. All software/hardware that requires data exchange that may include HIPAA protected information must comply with all state and federal requirements.

Software demonstrations:

- Homefull and its contracted IT Support Vendor must be included with all stakeholders in vendor software/hardware demonstrations. Homefull and its contracted IT Support Vendor recommends comprehensive demonstrations prior to the purchase of any software/hardware and will work with vendors to arrange remote (video conference) demonstrations as needed.
- In cases where agency data may be required for demonstration purposes, vendors must provide in advance all security compliance documentation, including written assurance that all data will be permanently removed from their systems following the demonstration.
- All HIPAA requirements apply to software/hardware demonstrations.

Software/Hardware quotes:

Homefull and its contracted IT Support Vendor will work to clearly define requests for quotes, and then Homefull and its contracted IT Support Vendor will submit the requests for quotes to vendors and work directly with vendors through the quoting processes to address their questions. By including Homefull and its contracted IT Support Vendor in quoting processes we can ensure that:

- quotes are based on system configurations currently in use and supported in our environment,
- all applicable discounts are included in the quotes,
- quotes include all necessary components and services (licensing, third-party products, continuing support services, etc.), and
- all costs including associated and continuing fees are consistently negotiated with respect to non-profit, and with respect to prior agreements we may already have in place with vendors.

BUDGET

When acquiring new software/hardware, the budget must include the cost of the software/hardware as well as all associated costs such as installation, training services, updates/upgrades, third-party products that may be necessary for software/hardware operation, costs associated with data transfers, and the cost of any specialized hardware or equipment that must be acquired. An estimated cost of the annual maintenance and licensing fees must also be included. Homefull and its contracted IT Support Vendor will assist with identifying all costs and with the development of the budget.

PROGRAM ADMINISTRATION
Technology Equipment Disposal Policy
(COA: RPM4, RPM5, RPM6)

Policy

Technology equipment often contains parts which cannot simply be thrown away. Proper disposal of equipment is both environmentally responsible and often required by law. In addition, hard drives, USB drives, CD-ROMs and other storage media contain various kinds of Homefull data, some of which is considered sensitive. In order to protect our organization's data, all storage mediums must be properly erased before being disposed of. Simply deleting or even formatting data is not considered sufficient. When deleting files or formatting a device, data is marked for deletion, but is still accessible until being overwritten by a new file. Therefore, special tools and process must be used to securely erase data prior to equipment disposal. The purpose of this policy it to define the guidelines for the disposal of technology equipment and components owned by Homefull

Procedure

This policy applies to any computer/technology equipment or peripheral devices that are no longer needed within Homefull including, but not limited to the following: personal computers, servers, hard drives, laptops, i-pads, mainframes, smart phones, or handheld computers (i.e., Windows Mobile, iOS or Android-based devices), peripherals (i.e., keyboards, mice, speakers), printers, scanners, typewriters, compact and floppy discs, portable storage devices (i.e., USB drives), backup tapes, printed materials.

- When Technology assets have reached the end of their useful life they should be sent to the IT Staff for proper disposal.
- The IT Staff will securely erase all storage mediums in accordance with current industry best practices.
- All data including, all files and licensed software shall be removed from equipment using disk sanitizing software that cleans the media overwriting each and every disk sector of the machine with zero-filled blocks, meeting Department of Defense standards.
- No computer equipment should be disposed of via skips, dumps, landfill etc.
- All electronic drives must be degaussed or overwritten with a commercially available disk cleaning program. Hard drives may also be removed and rendered unreadable (drilling, crushing or other demolition methods).
- Computer Equipment refers to desktop, laptop, i-pads, tablet or netbook computers, printers, copiers, monitors, servers, handheld devices, telephones, cell phones, disc drives or any storage device, network switches, routers, wireless access points, batteries, backup tapes, etc.
- The IT Staff will place a sticker on the equipment case indicating the disk wipe has been performed. The sticker will include the date and the initials of the technician who performed the disk wipe.
- Technology equipment with non-functioning memory or storage technology will have the memory or storage device removed and it will be physically destroyed.

PROGRAM ADMINISTRATION
Major Unusual Incidents
(COA: RPM2, BSM1)

Policy:
A copy of all Major Unusual Incidents (MUI) related to Homefull shall be documented on each program site. It is the responsibility of the Program Managers to document and address them appropriately.

Procedure:
A MUI means any event that poses a danger to the health and safety of persons served and/or staff of Homefull, and not consistent with routine care of persons served or routine operations of the agency. Incidents may involve persons served, agency staff while on duty, or visitors.

MUIs include the following:

- Deaths of consumers while enrolled in program services
- Serious bodily injuries to consumers while enrolled in program services
- Alleged criminal acts of staff or consumers
- Alleged abuse or neglect of consumers by staff or outside entities
- Any adverse reaction of a person served to a life threatening degree due to an administered drug
- Use of unauthorized seclusion and restraint
- Any incidents on agency property involving injury to staff or consumer
- Communicable disease
- Infection or Exposure Control
- Violence or Aggression on agency property
- Sentinel Events outside normal range of behaviors or events for consumer
- Use or possession of weapons on property
- Missing Persons Reports
- Vehicular Accidents
- Biohazardous accidents
- Use or possession of licit or illicit substances on property
- Suicide or attempted suicide
- Other events determined to be an MUI by management staff at time of occurrence

Critical MUI's will be reviewed by a sub-committee of the QA Committee. Critical MUI's selected will include death of a client, repeated incidents in the same program or with the same client, and other high profile occurrences. A summary of the review of MUIs will be included in QA Committee meetings. The summary of these incidents will include a written analysis of all the MUIs that addresses causes, trends, actions for improvement, results of any subsequent Quality Assurance Plans, any identified training or education needed by staff to prevent a recurrence, and internal and external

compliance with reporting requirements.

Debriefings from the Clinical Director will be offered to Homefull Staff and Consumers following traumatic emergencies in order to provide support to those involved in the event. Documentation of these debriefings will be maintained by the Clinical Director.

PROGRAM ADMINISTRATION
Reporting Missing and Runaway Children
(COA: ASE6)

Policy:
As a social service organization that works with families with children of all ages, it is the policy of Homefull to follow all legal guidelines when dealing with missing or runaway children. Homefull will report to the local authorities as well as maintain internal reporting procedures.

Procedure:
Homefull owns, operates, and provides support services for the Family Living Center, a permanent supportive housing (PSH) program, in addition to providing support services in other family programs. There are no programs within Homefull that serve unaccompanied minors; children may participate in events at the Child Life Center without parents when the family is a current resident of the Family Living Center. All Homefull staff, regardless of program assignment, receive training during orientation on duties as a mandated reporter. Homefull seeks to provide a supportive environment and includes information on our Safety First initiative in our Consumer Handbooks, given to all clients at first interaction with Homefull. When clients enter any PSH program they are provided a new copy and at this time their new Case Manager reviews key policies and program details. This information always includes safety protocol and building safety procedures.

When any Homefull staff member becomes aware that a child is missing from his/her home and is not able to be located, a supervisor is notified. The supervisor will consult with the Chief Operating Officer and call the police department to report the child as missing along with any details related to the situation. Based on the details regarding the missing child, the local Children's Services may also be notified as a child endangerment report. Homefull staff will cooperate with any police investigation while also supporting the clients involved. If the child is missing from the FLC specifically, video footage and/or observations of Engagement Specialists or Security will be shared with police to aid in the investigation.

For any missing child situation regardless of program, the reporting staff member will complete an MUI. Any MUI involving a child will be reviewed by the Critical MUI sub-committee for evaluation on handling of the MUI and identification of any trainings or other improvement plans.
Upon the return of the missing child to the family and the program, support services staff will meet with the family to not only welcome the child back but also debrief about the incident.

PROGRAM ADMINISTRATION
Risk Management: Contracts
(COA: HR7, RPM6, RPM7)

Policy:
Homefull will enter into contracts and service agreements with appropriate regard for practices that promote efficient use of resources.

Procedure:
Contracting Procedures and Contract Monitoring
Contract development may be initiated for consultation, the purchase of goods/services or the provision of services, or other agency needs that may be best served by working with a qualified outside party(ies). The contract should demonstrate that the parties and/or subcontractors have the capacity to provide services and comply with Homefull standards and applicable laws. The main objective is to ensure that each party fulfills its roles and responsibilities in a most efficient and effective manner while protecting the interests of the agency.

Contract development is performed by Homefull's Executive Management and Fiscal departments. Contract development includes drafting significant terms and conditions as appropriate to the type of contract and may include:

- roles and responsibilities of participating organizations;
- services to be provided;
- performance goals and measurable outcomes;
- service authorization, including eligibility criteria;
- provisions for training and technical support as necessary;
- duration of the contract;
- policies and procedures for sharing information;
- methods for resolving disputes;
- plan and procedure for billing and timely payment, and consequences for failure to pay;
- needed documentation and reporting method to funding and oversight bodies;
- conditions for termination of the contract

Contracts are reviewed by a qualified member of Homefull's Executive Management team or Board member or legal counsel prior to signing. The review ensures that the contract is both legal and the terms are clearly stated.

Contract monitoring is a process of ensuring that a vendor adequately performs a contracted service. Contract monitoring is performed by Homefull's Executive Management and Fiscal departments to ensure compliance with the contract terms and review/approval of invoices/reports. On an annual basis, an administrative and/or clinical review is conducted to review compliance with policies and quality of work completed under the terms of the contract.

A similar process is used to execute non-contractual service agreements, such as Memorandums of Understanding (MOUs) and may include:

- goals and objectives of the collaboration and/or services provided;
- roles and responsibilities of each organization, including reporting responsibilities;
- procedures for sharing information;
- confidentiality protections;
- assignment of case coordination responsibilities;
- service authorization procedures, including accepting or rejecting cases;
- how to resolve communication difficulties

PROGRAM ADMINISTRATION
Risk Management: Procurement
(COA: GOV7, RPM6, RPM7; CSB: A2, D6, D10)

All procurements made by Homefull involving the expenditure of funds will be made in accordance with the following procurement standards. Procurement transactions, regardless of method or dollar value, will maximize open and free competition. Homefull shall not engage in procurement practices which may be considered arbitrary or restrictive. Purchases will be reviewed by the CFO to prevent duplication and to ensure that costs are reasonable with final approval being made by the CEO.

METHODS FOR PROCUREMENT
Procurements shall be made using one of the following methods: (a) small purchase procedures, (b) competitive sealed bids, (c) competitive negotiations, (d) non-competitive negotiation.

A. Small Purchases

Purchases which cost between $250 and $1,000 will require three over-the-telephone quotations of rate, price, etc. A memorandum will be prepared setting forth the date calls were made, parties contacted and prices obtained. For purchases of less than $250, efforts will be made to get the lowest and best price, but written records of such efforts are not necessary.

Purchases of supplies, equipment and services which cost between $1,000 and $10,000 will require written estimates but no legal advertisement is required. Homefull will solicit written responses from at least three vendors, and if no such responses are available, a statement explaining the procurement will be prepared and filed.

B. Competitive Sealed Bids

Bidding will be employed when detailed specifications for the goods or services to be procured can be prepared and the primary basis for award is cost. When the cost of a contract, lease or other agreement for materials, supplies, equipment or contractual services, other than those personal or professional, exceeds $10,000, an Invitation for Bids (IFB) notice will generally be prepared. This notice will be published at least once in the Dayton Daily News, the official newspaper of general circulation in Dayton, Ohio. This newspaper notice will appear not less than seven (7) days and not more than twenty-one (21) days before the due date for bid proposals. Homefull may also solicit sealed bids from responsible prospective suppliers by sending them a copy of such notice.

The IFB will include a complete, accurate and realistic specification and description of the goods or services to be procured, the bid deposit, payment bond and bond performance required (if applicable), the location where bid forms and specifications may be secured, the time and place for opening bids, and whether the bid award will be

made on the basis of the lowest price or the lowest evaluated price. If the lowest evaluated price is used, the measurable criteria to be used must be stated in the IFB. The newspaper notice must also contain language which calls to the attention of bidders all applicable requirements which must be complied with such as Section 3 of the 1968 Housing Act, Section 109 of the 1974 Housing and Community Development Act, the Civil Rights Act of 1964, Executive Order 11246 and the Davis-Bacon Act.

Sealed bids will be opened in public at the time and place stated in the IFBs. The bids will be tabulated by the CFO at the time of bid opening. The results of the tabulation and the bid procurements will be examined for accuracy and completeness by the CFO who will make recommendations to Homefull. In addition, the CFO shall determine that all firms are responsive and responsible. Homefull will make the decision as to whom the contract shall be awarded. After the bid award is made by Homefull, a contract will be prepared for execution by the successful bidder. After the contract is signed, all bid deposits will be returned to all unsuccessful bidders.

Homefull may cancel an Invitation for Bid or reject all bids if it is determined that such is in the best interests of Homefull. Bidders will be notified in writing of such cancellation or rejection. Homefull may allow a vendor to withdraw a bid if requested at any time prior to the bid opening. Bids received after the time set for bid opening shall be returned to the vendor unopened.

C. Competitive Negotiations

Homefull will use competitive negotiations, regardless of contract amount, upon a written determination that:

1. Specifications cannot be made specific enough to permit the award of a bid on the basis of either the lowest bid or the lowest evaluated bid price (in other words, bidding is not feasible).

2. The services to be procured are professional in nature.

With the exception of certain professional services (principally engineering services), competitive negotiations will proceed as follows:

a. Proposals will be solicited through newspaper advertisement; additionally, a Request for Proposal (RFP) may be prepared and mailed to qualified vendors. The newspaper advertisement must be published at least seven (7) days and not more than twenty-one (21) days before the date for receipt of the proposals. The RFP will describe services needed and identify the factors to be considered in the evaluation of proposals and the relative weights assigned to each selection factor. The RFP will

also state where further details regarding the RFP may be obtained. The RFP will call attention to the same regulations discussed in the bidding process. Requests for proposals will always include cost as a selection factor.

b. Award must be made to the offeror whose proposal is determined in writing by Homefull to be the most advantageous to Homefull. Evaluations must be based on the factors set forth in the Request for Proposal and a written evaluation of each response prepared. The CFO may contact the firms regarding their proposals for the purpose of clarification and record in writing the nature of the clarification. If it is determined that no acceptable proposal has been submitted, all proposals may be rejected. New proposals may be solicited on the same or revised terms or the procurement may be abandoned.

For the procurement of certain professional services, an alternative to RFPs may be used. Homefull may publish a Request for Qualifications. RFQ's are handled in a similar method to RFP's with the exception that cost is not a factor in the initial evaluation. The CFO will evaluate the responses and rank them by comparative qualifications. The highest scoring person or firm will be contacted and the CFO will negotiate cost. If the CFO is unable to negotiate a satisfactory cost arrangement, the second highest scoring person or firm will be invited to negotiate. The CFO will maintain a written record of all such negotiations.

D. Noncompetitive Negotiations

Noncompetitive negotiations may be used for procurements in excess of $10,000 when bidding or competitive negotiations are not feasible. Homefull may purchase goods and services through non-competitive negotiations when it is determined in writing by the CEO that competitive negotiation or bidding is not feasible and that:

1. An emergency exists which will cause public harm as a result of the delay caused by following competitive purchasing procedures, or

2. The product or service can be obtained only from one source, or

3. The contract is for the purchase of perishable items purchased on a weekly or more frequent basis, or

4. Only one satisfactory proposal is received through RFP or RFQ, or

5. The state has authorized the particular type of noncompetitive negotiation (e.g., the procurement of services by an Area Development District).

Procurement by noncompetitive negotiation requires the strictest attention to the observation of impartiality toward all suppliers. Homefull must approve all procurements by non-competitive negotiation when only one supplier is involved or only one bid or response to an RFP/RFQ is received.

E. Bids will be accepted only from those contractors who have a proven record of ability to successfully complete the scope of work being bid. References will be requested along with the contractor's bid proposal. Any contractors submitting a bid must produce (along with his/her bid documents) written proof of liability insurance and worker's compensation coverage. Consideration will be given to such matters as contractor integrity, compliance with public policy, record of past performance and financial and technical resources in awarding contracts.

F. Upon submission of a bid, the contractor will present a bid guarantee equivalent to 5 percent of the amount of the contractor's submitted bid. Unsuccessful bidders will have their bid guarantee returned to them with the notice which advises them they are an unsuccessful bidder. The successful bidder will post (at the signing of the contract and notice to proceed) a performance bond equal to 100 percent of the contract amount, along with a payment bond equivalent to 100 percent of the contract amount.

CONTRACTS

Generally, all procurement in excess of $1000 will be memorialized and supported by a written contract. Where it is not feasible or is impractical to prepare a contract, a written finding to this effect will be prepared and some form of documentation regarding the transaction will also be prepared. The contractual provisions required by the "Common Rule," 24 CFR Part 84 Sections 47 and 48 and 24 CFR Part 92 Sections 504, 505 and all others as applicable will be included in all contracts. All contracts will contain language which allows Homefull the opportunity to cancel any contract for cause. Said cause shall include (but not be limited to) demonstrated lack of ability to perform the work specified, unwillingness to complete the work in a timely fashion, cancellation of liability insurance or worker's compensation, failure to pay suppliers or workers, unsafe working conditions caused by the contractor, failure to comply with Davis-Bacon wage laws (where applicable), failure to keep accurate and timely records of the job, or failure to make those records available to Homefull (on request) or any other documented matter which could cause a hardship for Homefull if a claim should arise or the work not be completed on schedule at the specified cost.

Requests for proposals will be structured to utilize value-engineering for any construction project in

excess of $50,000. Value engineering will allow the total job to be broken down and bid in sections, so as to produce the lowest overall cost of the project to Homefull. A project will request proposals for heating as one element, electrical as one element, etc. In some cases, this will make for a more cost-effective project. However, this does not preclude a bidder from making a lump-sum bid. Total cost will be calculated when value-engineering produces different bids for different scopes of work. Those segmented bids will then be added together to give a final project cost.

DOCUMENTATION

All source documents supporting any given transaction (receipts, purchase orders, invoices, RFP/RFQ data and bid materials) will be retained and filed in an appropriate manner. Where feasible, source documents pertinent to each individual procurement shall be separately filed and maintained. Where it is not feasible to maintain individual procurement files, source documents will be filed and maintained in a reasonable manner (examples include chronologically, by vendor, by type of procurement, etc.). Whatever form of documentation and filing is employed, the purpose of this section is to ensure that a clear and consistent audit trail is established. At a minimum, source document data must be sufficient to establish the basis for selection, basis for cost, (including the issue of reasonableness of cost), rationale for method of procurement and selection of contract type, and basis for payment.

LOCALLY OWNED, MINORITY-OWNED, FEMALE-OWNED AND SMALL BUSINESSES

All necessary affirmative steps will be taken and documented to solicit participation of locally owned, minority-owned, female-owned and small businesses. Homefull will solicit proposals from minority- or women-owned businesses that provide the goods or services that are being sought. Where possible and feasible, delivery schedules will be established and work will be subdivided to maximize participation by small businesses or minority- or women-owned businesses. Subdivided components will be bid as a separate contract. Where feasible, evaluation criteria will include a factor with an appropriate weight for these firms. A list of locally owned, minority-owned, female-owned and small businesses and also minority businesses located within the trade region shall be maintained and used when issuing IFBs, RFPs and RFQs. This list shall also be consulted when making small purchases. Homefull will use the services and assistance of the Small Business Administration and the Minority Business Development Agency of the Department of Commerce. The successful bidder will be required to use this same criteria in selection of suppliers and subcontractors whenever possible.

Per 2 CFR 200 as cited at https://www.dol.gov/agencies/eta/lsa**, Homefull will contract with small and minority businesses, women's business enterprises, and fi area firms as follows:**

(a) The non-Federal entity must take all necessary affirmative steps to assure that minority businesses, women's business enterprises, and labor surplus area firms are used when possible.

(b) Affirmative steps must include:

(1) Placing qualified small and minority businesses and women's business enterprises on solicitation lists;

(2) Assuring that small and minority businesses, and women's business enterprises are solicited whenever they are potential sources;

(3) Dividing total requirements, when economically feasible, into smaller tasks or

quantities to permit maximum participation by small and minority businesses, and women's business enterprises;
(4) Establishing delivery schedules, where the requirement permits, which encourage participation by small and minority businesses, and women's business enterprises;
(5) Using the services and assistance, as appropriate, of such organizations as the Small Business Administration and the Minority Business Development Agency of the Department of Commerce; and
(6) Requiring the prime contractor, if subcontracts are to be let, to take the affirmative steps listed in paragraphs (1) through (5) of this section.

CODE OF CONDUCT

A. Conflict Of Interest

No Homefull member, employee, consultant, elected official, appointed official or designated agent of Homefull will take part or have an interest in the award of any procurement transaction if a conflict of interest, real or apparent, exists. A conflict of interest occurs when the official, employee or designated agent of Homefull, partners of such individuals, immediate family members, or an organization which employs or intends to employ any of the above has a financial or other interest in any of the competing firms.

No Homefull member, employee or designated agent of Homefull may acquire a financial interest in or benefit in any way from any activity which uses any portion of HOME funding, nor shall they have any interest in any contract, subcontract or agreement for themselves or any family members, nor shall they ever occupy such HOME-assisted unit.

NOTE: These rules apply to all named parties and shall be effective for the period of service and for one year after leaving said position (or office, in the case of elected officials).

Exception to these rules may be sought by requesting exemption from the U.S. Department of Housing and Urban Development (HUD). Such request for exemption must be sent in writing to HUD. In order to make such request, first, the full nature of the conflict must have been made public and proof of such disclosure must be submitted to HUD, AND secondly, Homefull must submit to HUD a legal opinion which states that the potential conflict will not be a violation of state or local law.

B. Acceptance of Gratuities

No Homefull member, employee or designated agent of Homefull shall solicit or accept gratuities, favors or anything of monetary value from contractors, potential contractors,

subcontractors or potential subcontractors.

C. Penalties

Any Homefull member, employee or designated agent of Homefull who knowingly and deliberately violates the provisions of this code will be open to civil suit by Homefull without the legal protection of Homefull. Furthermore, such a violation of these procurement standards is grounds for dismissal by Homefull (if an employee) or such sanctions as available under the law (if an elected official).

Any contractor or potential contractor who knowingly and deliberately violates the provisions of these procurement standards will be barred from future transactions with Homefull.

PROGRAM ADMINISTRATION
Risk Management: Ethical Development Practices
(COA: FIN6)

Policy:
While Homefull does not, by definition, have shareholders, it is similarly accountable to both its donors and the consumers we serve through our mission. Homefull has an obligation to make solid business decisions to help us meet both our short and long term strategic objectives. Homefull is committed to holding itself to the highest standards of ethical accountability. Fundraising to the general public is a key function of Homefull's development efforts as it is a primary source of unrestricted financial support. Without our donors and development activities, we could not remain viable. Fundraising is both a short and long term investment in the mission of the organization. Homefull will clearly articulate the mission and vision of the organization through its activities including Human Resource and staff development, all fundraising and development efforts, marketing and communications and the delivery of services to our consumers. Homefull will operate in a manner that is consistent with the vision and mission of the organization. Homefull is committed to operating with clear and transparent records consistent with our ethical policies, procedures and industry best practices. Homefull will apply good faith effort to comply with all relevant federal and state laws and regulations. As a non-profit agency, Homefull accepts in-kind donations from the community to support the mission and vision of the organization. Homefull will maintain a list of donations that are accepted and a process for how donations are processed, utilized, and recorded.

Procedure:
Database security and access
Homefull uses a secure Donor Perfect software system to record all donor information including: name and contact information, contacts from staff, gift history and other pertinent data. Access to the database is limited to Development staff, as well as the Chief Executive Officer and Chief Operating Officer. The database is password protected and backed up on a regular basis to protect its accuracy and security. In addition, at no time is donor information ever given or sold to other agencies for any reason nor is confidential gift information ever shared with anyone outside of administrative, development and fiscal staff.

Gift acceptance procedures
Gifts are entered daily and acknowledgment letters generated within 48 hours of receipt. These letters are created to reflect the amount of the gift, donor intentions, and how the organization intends to use the funds. These procedures hold true for gifts-in-kind as well as for outright cash and other real property. In addition, copies of letters where a donor restricts their gift are kept so that a record of the donor's wishes is easily accessible and integrity of the gift is maintained.

Homefull's gift acceptance philosophy is that all gifts are not necessarily in keeping with the mission of Homefull. It is ok to say "thank you but no" to a donor if their support does not line up with the agency's priorities or if the gift maintenance would be prohibitive given the available resources. Acceptance of any contribution, gift or grant is at the discretion of the Homefull. Homefull will not

accept any gift unless it can be used or expended consistent with the purpose and mission of the organization. No irrevocable gift, whether outright or life-income in character, will be accepted if under any reasonable set of circumstances, the gift would jeopardize the donor's financial security. Homefull will refrain from providing advice about the tax or other treatment of gifts and will encourage donors to seek guidance from their own professional advisors to assist them in the process of making their gift.

Homefull will accept donations of cash or publicly traded securities. Gifts of in-kind services will be accepted at the discretion of Homefull. Certain other gifts, real property, personal property, in-kind gifts, non-liquid securities, and contributions whose sources are not transparent or whose use is restricted in some manner, must be reviewed prior to acceptance due to the special obligations raised or liabilities they may pose for Homefull.

Homefull will not compensate, whether through commissions, finders' fees, or other means, any third party for directing a gift or a donor to Homefull. Homefull will utilize tax and investment professionals' expertise when accessing the unique nature of a specific gift in question.

Gifts of equipment and material
Homefull encourages and appreciates gifts-in-kind, such as hygiene supplies, clothing, food, household supplies and furniture, computer hardware and software and other materials that the organization would otherwise need to purchase. Through gifts-in-kind, supporters help Homefull strengthen programs and services.

In Kind Gift Acceptance guidelines
All gifts-in-kind are reviewed, accepted and officially acknowledged. Prior to acceptance, the gift is reviewed to see if it meets Homefull's needs. Homefull reserves the right to decline any gift that does not further the organization's goals or may involve special maintenance or other conditions the organization would be unable to satisfy. Donation receipts are provided to the donor as appropriate. All in-kind donations are reported to the Chief Finance Officer and recorded in official fiscal records. Household items are accepted as in-kind donations; these are sorted and maintained in a donation room where they can be accessed by Case Managers for dispersing to clients. Items are recorded in a log to track which program utilized the items.

Donations of residential property are not able to be accepted by Homefull as the agency prefers to partner with other organizations who own/operate properties while Homefull provides onsite support services. When a donor inquires about property donation, Homefull will provide the donor suggestions of alternative organizations that may accept properties.

Other donations will be reviewed by the CEO and/or the Board as needed.

In Kind Gift Appraisal guidelines
Homefull does not provide gift valuation. In accordance with Internal Revenue Service regulations, the

donor is responsible for determining the value of an accepted gift. If the estimated value of the gift exceeds $5,000, then a qualified appraisal is required by the IRS to substantiate a donor's charitable deduction for gifts-in-kind. Homefull employees are not qualified appraisers, and federal regulations do not permit Homefull to give appraisals or estimates of value.

Donor acknowledgment and recognition

Homefull recognizes that a true development effort incorporates more than a response by a donor to a direct solicitation, that it is truly the development of a long-term relationship between the donor and the organization. To deepen this partnership, individuals, corporate sponsors, and foundations are recognized in a variety of ways which are appropriate according to the level of their support and in keeping with their wishes and policies.

Homefull will provide acknowledgments to donors meeting IRS substantiation requirements for property received by the charity as a gift. However, except for gifts of cash and publicly traded securities, no value shall be ascribed to any receipt or other form of substantiation of a gift received by Homefull.

Homefull will respect the intent of the donor relating to gifts for restricted purposes and those relating to the desire to remain anonymous. With respect to anonymous gifts, Homefull will restrict information about the donor to only those staff members with a need to know.

Volunteers are recognized in newsletters, on social media outlets, with appreciation gifts and at particular events. Corporate and foundation partners are given recognition in some of the same ways as individuals, as well as with signage at special events, trainings and other appropriate venues. Open Houses and "thank you" receptions are also utilized to further build relationships with donors.

PROGRAM ADMINISTRATION
Risk Management: Tenant Applicant Screening
(COA: RPM6, RPM7)

Policy:
As an organization that serves a vulnerable population and has an interest in protecting clients from harm, Homefull will pursue background checks and eviction histories on all tenant applicants prior to an acceptance of tenancy. All applicants will be informed of this process at the time of their application.

Procedure:
When a potential tenant applies for housing via a program for which Homefull manages the property, a background check and eviction history will be conducted via a third party company with expertise in this service. This will be part of the screening process for accepting applicants as tenants and will be noted on the housing application. Additionally, a signature on the housing application will indicate approval of allowing a background and eviction history check.

After being notified by Homefull and an email address provided for the applicant, the third party screening company will contact the applicant to request data needed to pursue the background check and eviction history. All communication regarding the collection of information for the background checks and the process will be conducted between the third party company and the applicant. Once the screening is completed, the third party company will communicate the results to Homefull administration via a confidential report.

Homefull staff and administration will make a decision on acceptance of housing applicant once these results are reviewed along with other factors that are part of the housing application. In some cases, applicants may be asked for further detail about specific issues revealed through the screenings prior to an official offer of housing and background checks finding results will not automatically result in a denial of housing.

PROGRAM ADMINISTRATION

Health and Safety

(COA: RPM1, RPM2, ASE1, ASE4, ASE6, CSB: H1, J2)

Policy:

The CEO is responsible for monitoring to ensure the safety and security of consumers, staff, and visitors. To minimize the potential of harm and increase the accessibility of services to the consumers, visitors, and staff, Homefull safety policies comply with all standards of all Federal, state, and local requirements for health, safety, and accessibility (including Section 504 of the Rehabilitation Act of 1973 and the Americans With Disabilities Act of 1990). Homefull will work to minimize germs on environmental surfaces and thereby reduce the spread of infection to residents and staff.

Procedure:

Homefull will complete self-inspections of its facilities on a regular basis and monthly results are compiled in a written report that identifies:

- Areas inspected
- Recommendations for areas needing improvement
- Actions taken to respond to the recommendation

Homefull staff members are required to complete a vehicle inspection form each time they use a company vehicle. Any immediate mechanical needs are reported to the appropriate manager and addressed. The report forms are collected at the end of each month and any maintenance issues are identified and corrected.

Principles

Cleaning products should:

- be selected on the basis of effectiveness, acceptability, safety and cost;
- be appropriate to the task;
- be diluted and used according to manufacturer's instructions;
- be stored in a safe manner; and
- ***not be mixed*** inappropriately (ex: chlorine and toilet bowl cleaner combine to form a toxic gas)

Surfaces must not show any visible soil before they are sanitized.

Cleaning equipment should be maintained in a clean, dry state after use. Cloths, mop heads, etc., should be changed when soiled after use. Personal protective equipment (ex: gloves) should be available and used appropriately. Garbage should be contained and disposed of by usual methods. Sharp objects (such as needles) should be placed in approved, puncture-resistant containers to prevent puncture injuries or cuts to the skin.

Products for cleaning and sanitizing

Cleaning with detergent and water is generally acceptable.

Commercial household products are acceptable to sanitize environmental surfaces and should be used according to manufacturer's instructions.

To prepare a noncommercial sanitizing solution, use unscented chlorine bleach:
- for wiping cutting boards, surfaces, etc., mix one tablespoon (15 ml) in four liters (3.5 quarts) or water.
- for immersing dishes, dishcloths, etc., mix one tablespoon (15 ml) in four liters (3.5 quarts) of water.

Method

Cleaning should proceed from least to most soiled. Cleaning solutions should be changed when they appear dirty and/or after a spill cleanup.

Cleaning primarily involves horizontal surfaces (ex: countertops, table tops, floors) and surfaces that are frequently handled (ex: door knobs, telephones, bathroom fixtures). Walls may require spot cleaning.

Spills involving blood or body wastes should be cleaned up with disposable towels/cloths, which should be placed in a plastic bag for disposal in the regular garbage. The area involved should be cleaned with detergent and water and then sanitized with an appropriate product. Reusable gloves should be worn.

For information about cleaning toys, see *Guidelines for Children* (page 9).

Cleaning schedules

A maintenance/housekeeping checklist is included in the Appendix. Cleaning schedules should be established according to the type of surface to be cleaned and the type of soiling that occurs. For example:

- spills – clean immediately.
- surfaces used for food preparation or diapering – clean after each use.
- kitchen, bathrooms, playrooms – clean daily and as necessary.
- resident rooms, living rooms, offices, appliances – clean weekly and as necessary.
- mattresses, pillows, bedframes, bedroom furniture – clean between occupants.
- household furniture, walls, carpets, etc. – follow a rotating schedule (monthly/yearly) and as necessary.
- toys –.
- reusable gloves – clean after each use.

Sanitizing is indicated for:

- food preparation surfaces
- diaper changing surfaces
- infant and toddler toys
- spill clean-up
- reusable gloves

PROGRAM ADMINISTRATION
Health and Safety/Tool Maintenance

Policy:
Homefull employees utilize tools and equipment in the maintenance department as part of our property management and food programs. Consumers who are part of the Workforce Development training program and/or become employed by Homefull Solutions would use tools and equipment appropriate to their assigned job. It is the policy of Homefull that all staff and consumers assigned to use equipment or tools would be trained in proper safety procedures as well as maintenance of the tools and equipment.

Procedure:
Use of tools by any consumer must be approved by Maintenance Supervisor or Division Director after training and demonstrated ability to use safety equipment. Consumer use is limited to participants in the training program and those hired by Homefull Solutions.

Homefull's Maintenance Supervisor holds key responsibility for overseeing the maintenance of all equipment and tools. The schedule is as follows:

Mowers –blades are changed every other week.
Other tools (for example: saws, drills, etc.)– reviewed for maintenance needs by the Maintenance Supervisor regularly with a formal inventory every 6 months.
See vehicle maintenance policy for vehicle information.

PROGRAM ADMINISTRATION
Health and Safety/Accessibility
(COA: ASE3)

Policy:
Homefull will demonstrate accessibility planning that addresses the needs of the persons served, personnel, and other stakeholders. Homefull will address accessibility issues, as feasible, to enhance the quality of life for all those involved in its programs.

Procedures:
Homefull will develop an accessibility plan which addresses the following items:

- Identification of barriers in:
    1. Architecture
    2. Environment
    3. Attitudes
    4. Finances
    5. Employment
    6. Communication
    7. Transportation
    8. Any other barrier identified by the persons served, personnel, or other stakeholders.
- Time lines for removal of identified barriers
- Actions for removal of the identified barriers

Homefull's accessibility plan will be developed and it will be integrated into the organization's overall Strategic Plan when needed; so that it can be modified and progress toward the removal of any identified barriers/areas of improvement can be monitored on a regular basis by the Homefull Health and Safety Committee when appropriate. Homefull's CEO will also be responsible for ensuring that all requests for accommodations by staff, consumers, or other stakeholders are identified, reviewed, decided upon, and documented through the appropriate channels.

PROGRAM ADMINISTRATION
Health and Safety/Communication Assistance
(COA: ASE3, CSB: E12, F1)

Policy:
It is Homefull's policy to provide assistance, as appropriate according to the person's needs, at no additional cost to persons served, to persons requesting or receiving services, and their families or significant others, who speak a language other than standard English as a primary means of communication, or who have a communication disorder, such as deafness or hearing impairment. Such assistance shall include the availability of appropriate communication devices, including telecommunication assistance for the deaf (Ohio Relay Service), according to 29 U.S.C. 794, 45 CFR part 84 et seq.

Procedure:
When a client needs special communication services, Homefull staff will notify their Program Manager and the Chief Operating Officer. The COO will be responsible for ensuring the arrangement of any accommodations requested by a client and his/her family or significant others. Homefull will contact a local Interpreters for the Deaf or similar organization for sign language/interpreting services or one of many local universities with foreign language departments or a local interpreter service for assistance in communicating with individuals for whom English is not a primary language.

Homefull utilizes the Ohio Relay Service which can be reached at 1-800-750-0750.

Homefull has made available the Client Rights, Consumer Handbook, and other primary documents for clients in Spanish, large print, and audio versions to assist with communication.

When translation/interpretation is offered, the consumer has the choice to engage with services offered or to utilize their own resources if desired.

PROGRAM ADMINISTRATION
Health and Safety/Auxiliary Aids
(COA: ASE3, CSB: E12, M18)

Policy:
Auxiliary Aids are sometimes necessary for clients of Homefull. Communication assistance for individuals who are Deaf or hard of hearing are provided at no additional cost to persons served, their family members and/or significant others. Auxiliary Aids for individuals who are blind or who experience low vision or other sensory disabilities will also be provided at no additional cost to the persons served, their family members and/or significant others. Services may include the provision of telecommunication devices for the hearing impaired, interpreters or referral to a service that provides interpreters. Auxiliary Aids may include large print materials, computer disks containing the information for the client, or Braille materials. Every effort is made to arrange for whatever appropriate accommodation is needed to allow for barrier free services for the client.

Procedure:
When Homefull is responsible for obtaining the services, Homefull staff will contact Interpreters for the Deaf for sign language interpreting services. Homefull also will utilize Wright State University's Department of Disability Services to arrange for accommodations in written materials, such as Large Print, Braille, or spoken versions.

Homefull utilizes the Ohio Relay Service for the hearing impaired which can be reached at 1-800-750-0750.

When additional Auxiliary Aids would be beneficial to the client with low vision or blindness, a referral will be made to the Bureau of Services for the Visually Impaired, with whom Homefull has established a collaborative relationship in meeting the needs of consumers.

PROGRAM ADMINISTRATION
Health and Safety/Smoking and Drug Use
(COA: ASE1, ASE5, CSB: A6, E1)

Policy:
Smoking Policy
Homefull prohibits the use of tobacco and other inhalants inside its program sites and when transporting clients. Consumers, staff, or visitors who fail to abide by the Smoking Policy will be asked to leave the facility. Appropriate follow-up with consumers and staff will occur following a request to vacate the building. No use of vapes other electronic smoking devices is allowed inside Homefull buildings or Homefull vehicles or when transporting clients in personal vehicles.

"Smoking" in this policy refers to inhaling, exhaling, burning, or carrying any lighted or heated cigar, cigarette, or pipe, or any other lighted or heated tobacco or plant product intended for inhalation, including hookahs and marijuana, whether natural or synthetic, in any manner or in any form. "Smoking" also includes the use of an electronic smoking device which creates an aerosol or vapor, in any manner or in any form.

"Electronic Smoking Device" means any product containing or delivering nicotine, CBD, THC, or any other substance intended for human consumption that can be used by a person in any manner for the purpose of inhaling vapor or aerosol from the product. The term includes any such device, whether manufactured, distributed, marketed, or sold as an e-cigarette, e-cigar, e-pipe, e-hookah, or vape pen, or under any other product name or descriptor.

Illicit/Licit Drugs on Property
Illicit Drugs are not permitted on any of the program sites of the organization. Consumers/staff, or visitors who fail to abide by this policy will be asked to leave the facility. Appropriate follow-up with consumers and staff will occur following a request to vacate the building. Illicit drugs found on the property will be turned over to the local Police Department.

Licit drugs prescribed to the person in possession of them are permitted at program sites. However, licit drugs should be within the owner's control at all times and not be traded, shared, or otherwise distributed to another individual on the property. Failure to abide by this policy will result in a request to vacate the building. Appropriate follow-up with consumers and staff will occur following a request to vacate the building. Employees should not utilize onsite or share alcohol or drugs with other employees.

Weapons on Property
Homefull prohibits the possession of weapons on any of the program sites of the organization. Weapons include, but are not limited to:

- Firearms
- Knives

- Martial Arts Weapons
- Tear Gas/Pepper Spray/Mace
- Bombs
- Other Explosive Devices
- Stun Guns/Tasers

Consumers, staff, or visitors who fail to abide by the Weapons Policy will be asked to leave the program site. If they fail to leave, 9-1-1 will be called for assistance. Appropriate follow-up with consumers and staff will occur following a request to vacate the building.

Homefull staff will not conduct any in-person visits, including home visits, with clients who are known to be in possession of a firearm regardless of client's legal standing.

PROGRAM ADMINISTRATION
Health & Safety: Concealed Carry
(COA: ASE1, ASE5, CSB: A6, E1)

Policy:
Homefull is committed to providing its employees a work environment that is safe and secure and to providing a safe and secure service environment for clients. This commitment includes prohibiting employees from possessing or having under their control a weapon. As an accredited organization, Homefull is committed to the Administrative and Service Environment standard that states: "In its daily operations, the organization ensures the health and safety of its personnel and the individuals and families it serves."

Weapons inside the workplace pose a potential threat to the safety and security of our employees, volunteers and clients; firearms of any type are strictly prohibited at all times inside Homefull program sites, or while you are engaged in the work of the agency of Homefull, whether on-site or off-site. The carrying of a firearm of any kind while inside a Homefull owned property, program sites, or leased space, inside a company-owned vehicle or transporting a Homefull client in your personal vehicle, or while conducting Homefull business, on or off-site, is considered a violation of this policy and of the COA standard related to health and safety.

It is the policy of Homefull that notices are posted at all program sites stating that weapons are not allowed on the premises. This policy is also included in the personnel policies section of the Policies & Procedures Manual. Employees who violate this policy will be subject to disciplinary actions, up to and including employment termination. This policy is also included in the personnel policies section of the Policies & Procedures Manual.

Procedure:
Regardless of whether an employee possesses a concealed weapons permit (CCW) weapons are prohibited on any Homefull property. Individuals covered by this policy who have been issued a permit to carry a concealed weapon in the State of Ohio are not exempt from the above provisions. Individuals covered by this policy who carry or possess a weapon must store the weapon in accordance with the law prior to entering an area in which a weapon is prohibited. The weapon and/or ammunition must remain inside the person's privately-owned motor vehicle while the person is physically present inside the motor vehicle while on agency business, or the weapon and/or ammunition must be locked in the trunk, glove box, or other enclosed compartment or container within or on the person's privately-owned motor vehicle while on property owned or leased by Homefull. However, if the employee's personal vehicle is used to transport clients, the vehicle then becomes Homefull workspace and the no weapons policy applies.

Any employee who stores a weapon in their personal vehicle (that is not used for transporting Homefull clients) is required to complete a Disclosure of Firearm Possession Statement that will be reviewed by Homefull's Health & Safety Manager and maintained in the employee's personnel record. This form is included in the Appendix. All Homefull employees are trained in a crisis intervention model with refresher training regularly and some staff have been trained in how to respond to a violent intruder.

PROGRAM ADMINISTRATION
Health and Safety/Bed Bugs

Purpose
Throughout the course of Homefull's work, staff may come into contact with clients or households that report bed bugs. Bed bugs are increasingly common and exposure may occur in both professional and personal environments. Homefull will provide education, training, and preventive tools to reduce the risk of exposure and transmission. Employees are expected to follow all established prevention protocols when engaging in activities that may present risk.

This policy is intended to:

- Equip staff with the knowledge and tools to minimize exposure risk;
- Establish clear expectations for preventive practices;
- Provide guidance for limited, discretionary financial assistance in cases where exposure may be linked to work-related activities despite adherence to required prevention measures.

This policy does not guarantee financial assistance or assume responsibility for all instances of bed bug exposure or infestation.

Procedure
Employees are required to follow all preventive practices outlined in this policy when engaging in work activities that may involve potential exposure to bed bugs. Homefull will conduct training in each orientation session that includes a basic education about bed bugs and includes commonly practiced preventive methods. At program sites and in offices where community staff are based, Homefull will maintain a supply of alcohol and spray bottles and PPE as needed to enter units. These preventive supplies will be provided to all employees who engage in regular visits into client/tenant units including but not limited to: maintenance staff, inspectors, housing staff, Case Managers, and Program Managers.

Additionally, Homefull maintains the practice of staff not transporting clients with known bed bug infestations, not entering homes where there are known infestations, and providing pest control to housing sites that Homefull maintains. Employees are expected to consistently implement the following prevention practices:

- Bring minimal items into client homes for home visits,
- Avoid sitting on upholstered furniture or placing personal items on the floor,
- Be observant,
- Remove work clothing when arriving home and place in laundry,
- Do regular inspections of work bags and car,
- Dry clothing on high heat if any concerns or suspicion of bed bugs.

Employee Responsibility and Prevention Compliance
Employees are responsible for following all training and prevention protocols provided by Homefull to minimize the risk of bed bug exposure and transmission. Failure to follow established prevention practices may impact eligibility for any financial assistance under this policy. Homefull provides training, supplies, and

guidance to support prevention efforts; however, employees share responsibility for implementing these practices consistently.

If an employee reports bed bugs at their own home
Homefull will consider requests of support from employees who report bed bugs at their home and need to conduct remediation. All requests will be kept confidential and treated as other employee data is protected. Eligibility for this support includes:

- Supervisor verification of work related activity with potential exposure, including confirmation that required prevention practice and tools were appropriately utilized.
- Provide documentation confirming a bed bug infestation (e.g. pest control inspection);
- List of items that need to be replaced;
- Provide documentation of cost of treatment and items that need to be replaced;
- Documentation of any medical treatment for bites, etc.;
- Have not exceeded the maximum number of assistance requests (if applicable, e.g., one-time per 12-month period)

Covered Expenses
Eligible expenses may include:

- Professional pest control/extermination assessment and treatment services
- Required follow-up treatments
- Laundry or sanitation services directly related to treatment
- Essential protective equipment (e.g., mattress covers)

Non-covered expenses:

- General preventive treatments without confirmed infestation (as this is a common practice for most employees)
- Replacement of furniture, mattresses, or personal belongings
- Self-treatment products unless pre-approved
- Costs associated with infestations where prevention protocols were not followed

Financial Assistance:
Financial Assistance is discretionary and subject to review of documentation, compliance with prevention protocols, and available organizational resources.

- The maximum assistance amount is $500 per employee per incident, not to exceed more than 1 incident a year
- Assistance may cover up to 100% of eligible expenses, not to exceed the cap
- Payments may be made directly to the vendor or reimbursed to the employee
- A pest control invoice or inspection report confirming bed bugs must be provided
- Itemized receipts or invoices for all requested reimbursements must be provided
- Approved funds will be paid within 10-15 business days after approval

Approval Process:

- Requests must be submitted to Homefull HR
- HR will review documentation and determine eligibility is met
- HR will submit to COO/CEO for final approval
- Approval is subject to available funds and organizational discretion
- Employees will be notified of approval or denial in writing

PROGRAM ADMINISTRATION
Drug Free Workplace
(CSB: A5, E1)

Policy:
Homefull is in compliance with all state and federal regulations for maintaining a drug-free workplace, as described in the Drug Free Workplace Act of 1988.

Procedure:
Homefull complies with the Drug Free Workplace Policies and Procedures as outlined by Homefull Personnel Policies.

PROGRAM ADMINISTRATION
Health and Safety/Designation of Safety Officer
(COA: ASE4, ASE5, CSB: E14)

Policy:
Homefull has designated a safety officer at each site for ensuring adherence to Health and Safety policies. Collectively these safety officers represent the Health and Safety Committee of Homefull.

Procedure:
The Health and Safety Committee consists of a variety of staff at different levels and positions in the organization. An updated list is maintained by the chair of the Health & Safety Committee and is included in each site's Health & Safety Manual.

PROGRAM ADMINISTRATION
Health & Safety/Transportation Procedures
(COA: ASE4, ASE5, ASE7, RPM5)

Policy:
Transportation assistance is provided by Homefull staff to consumers. When transporting clients, all employees will adhere to the following requirements:

- Will provide the agency, on a yearly basis, proof of liability insurance, and;
- Will provide the agency with current and valid driver license, and;
- Will inform the agency of any infraction, and;
- Will maintain legal safety standards on their vehicle, and;
- Will respect traffic and vehicular transportation laws as set forth by the Ohio Department of Transportation, and;
- Will not drive under the influence of illegal drugs, alcohol or prescribed medication that could cause drowsiness.

Clients may receive transportation related to their services and treatment plans.
In the event that Homefull is authorized to transport a client we request that the legal guardian sign the Transportation Waiver Form. This form and a copy will be maintained in the client's file.

Whenever Homefull employees are uncertain that transporting a consumer/family member in a specific instance is safe and/or appropriate, they are to consult their supervisor prior to providing transportation. If at any time a Homefull employee feels the client is no longer appropriate for transportation assistance for any reason the client can be asked to exit the vehicle immediately.

For Homefull vehicle use, please refer to the Homefull Vehicle policy in the Personnel Policies section. Driving records of employees will be reviewed by agency insurance for inclusion on vehicle insurance policy. Employees approved for driving by the insurance company will complete a Vehicle Use form and an in-house driving test prior to first usage of any agency vehicle.

Procedure:
1. Only the client being served by Homefull and their children are permitted to travel in the vehicle. The maximum carrying capacity of the vehicle is not to be exceeded.
2. Transportation services are generally only available within the program's local county. Transportation outside the county must be approved by a supervisor.
3. Seatbelts are to be worn at all times and children are to be seated by the parent or guardian utilizing child restraints in accordance with the Ohio revised code. All children are to be seated in the rear of the vehicle and under supervision. Transportation will not commence until all seatbelts are in use. Drivers are required to immediately cease transportation if seatbelts aren't

in use for all passengers. This includes the correct securing of children's safety restraints. Case managers who transport children must receive instruction in proper child safety seat installation.

4. Clients acting irresponsibly or breaching traffic regulations will not be tolerated and Homefull staff reserve the right to cease transportation and request that the offending passenger(s) exit the vehicle.
5. Homefull has a responsibility to provide a safe working environment for staff. The Homefull CEO and/or management staff reserves the right to refuse to offer transportation services to clients whose behavior breaches this policy. The Homefull CEO and/or management staff will issue a written notice to the client to advise that access to further transportation services has been suspended.
6. Drivers are requested to take the most direct route to reach the destination.
7. No smoking, eating or drinking in vehicles.
8. No use of mobile phones when driving vehicle, including texting while driving.
9. Transportation will be refused in the circumstances that either the client or passengers are intoxicated and/or under the influence.
10. The logbook located within company vehicles must be completed after each use.
11. A copy of the policy and procedures will be available at each program site.
12. Clients will sign a transportation waiver form and provided with a copy of the Transporting Client Procedure document.

Medical Emergencies in Vehicles

In all circumstances, the driver of the vehicle (unless they are unable) will take control during all vehicle or transportation related emergencies. This includes the operation of any emergency functions of the vehicle.

In the event of a medical emergency, the driver must proceed as follows:

- Stop the vehicle in a safe area (taking into account the nearest cross street for location reference)
- Assess all person's medical conditions
- Call an ambulance and apply First Aid where necessary
- Call and inform the Program Manager
- Brief first responders
- Contact family member, if necessary

Vehicle Breakdowns

In the event of a mechanical breakdown, immediate action will be taken by the driver to minimize the danger to passengers and others to ensure their comfort and safety. The Program Manager shall be notified of the breakdown as soon as possible and kept informed of any developments.

Motor Vehicle Accident Procedures

In the event of a road traffic accident involving a Homefull vehicle, the highest priority is to ensure the safety of passengers and staff. Minimizing risk to the general public and observing legal obligations are

also important considerations.

In view of this fact, the following procedures shall apply:

- Stop at once
- Ensure the vehicle is not posing a traffic hazard
- Where an accident has been very minor and involved no other person or damage to third party property, the vehicle should be checked for damage and/or roadworthiness before proceeding.
- If the accident involves another party but is minor and on private property (e.g. a parking lot fender bender), exchange contact information with the other party; Homefull contact information should be provided if driving a Homefull vehicle since this involves Homefull insurance and vehicle records.

Where the accident is more significant:

- Ensure passengers are ok and in a safe place. If necessary, move passengers to a safer place by the side of the road
- Where necessary, contact relevant emergency services: Fire/Ambulance
- Report the accident to the Police
- Get the names and addresses of all witnesses to the accident
- No Homefull team member shall admit liability for an accident or make statements or comments, which may be interpreted as an admission of liability- additionally no cash should be exchanged for addressing damages;
- If another vehicle is involved, a record of the following information should be obtained:
    1. The owners name, address and telephone number
    2. The drivers name, address and telephone number
    3. The name of the owners insurance company
    4. The make, model and registration number of the vehicle
    5. Get the accident report number
    6. Take pictures of the damage to both vehicles.

Contact the Program Manager who will provide assistance and complete an Accident/Incident form and any relevant insurance paperwork and forward it to the Program Manager as soon as possible after the accident when staff have returned to safe location.

Motor Vehicle Maintenance Procedures

An assigned Program Manager will provide a monthly report to the CFO of all vehicle condition reports. This report will include information gathered from the logs maintained in all agency vehicles. A copy of the vehicle condition report is included in the Appendix.

PROGRAM ADMINISTRATION
Health and Safety/Sex Offenders Policy
(COA: ASE5, CSB: H1)

Policy:
Clients who present for services but are known sex offenders are handled differently in the various regions of Homefull's programming. In Dayton/Montgomery County, Ohio housing programs, Homefull does not serve sex offenders. In the Gateway Men's emergency shelter, sex offenders are served with a limited capacity. The Community Transitions Program (CTP), which serves western Ohio counties outside of Montgomery County, does serve sex offenders as referred through the statewide program. Homefull does provide shelter and services to sex offenders in the Columbus, Ohio housing programs with limits based on status/registration/housing availability.

Procedure:
DAYTON/MONTGOMERY COUNTY
For the Montgomery County Gateway Men's Emergency Shelter, clients in need that have registered sex offender status are admitted. Registration and compliance are checked and coordination with the local SORN unit occurs. Regular checks of the SORN registration list and current shelter census are completed by staff and urgency is placed on housing clients with sex offender status to keep the number in shelter to a minimum. Staff also coordinate with parole/probation officers as needed. For housing programs, the client is potentially referred for services outside of Homefull based on the limitations of their housing requirements. Family housing programs are never allowed to admit clients with sex offense histories.

WESTERN OHIO/CTP
Clients served in CTP are exiting prison and as such some will have sex offenses on their record at the time of entrance to Homefull's program. When referrals are made to Homefull as part of CTP, all are served as per program regulations. Appropriate local regulations based on the county of residence/housing placement will be followed including but not limited to: limits of housing location based on sex offender status level and working with the client to follow all registration requirements.

COLUMBUS
Homefull will serve all clients in the scattered site shelter + care program as assigned. Appropriate safety measures will be put in place when working with a known sex offender in a scattered site placement, including but not limited to: tandem home visits with a Case Manager and supervisor, community site visits outside the home, and office visits. For Property Management projects, Homefull will accept sex offenders per the system regulations and will seek to perform public records verifications of offenses to be maintained in their records so that appropriate follow up can be made. Homefull staff will follow local regulations and will encourage all clients who are registered sex offenders to be following up with any probation/parole officers and maintaining registry as required.

PROGRAM ADMINISTRATION
Health and Safety/Emergency Situations/Disaster Plan
(COA: ASE5, ASE6, ASE7; CSB: A7, E1)

Policy:
The Homefull Disaster Plan outlines how staff responds if a disaster were to take place at Homefull sites that affect clients. Designated staff will serve as members on the Homefull Emergency Action Response Team (HEART). HEART will respond in the event of a disaster to ensure the health and safety of staff and clients.

Procedure:
In the event of a natural disaster, Homefull staff members at the scene will assess the situation and institute the following notification plan:

- Call emergency services, as needed
- During regular business hours, notify the on-site supervisor. If after hours, notify the On-Call at (937) 789-1159. Be prepared to answer the following questions:
  a. Are clients or staff injured?
  b. Have emergency services been notified?
  c. Is the situation stabilized or ongoing?
  d. Are clients and staff safe?
  e. Is an evacuation required?
  f. Have program partners been contacted?
- If the on-site supervisor or the On-Call determines a HEART response is appropriate, the CEO is contacted to review circumstances and authorize HEART activation. When authorized, the on-site supervisor or On-Call will notify HEART members. The list of HEART contact information is available in Dropbox and the On-Call binder.
- HEART will initiate Homefull's disaster plan in accordance with policies and procedures specific to the emergency.
- HEART and first responders will coordinate evacuation, transportation and emergency housing plans with local disaster relief agencies.
- In the event programs cannot resume at the site due to ongoing disaster or damage, HEART will coordinate with emergency management agencies to relocate to a temporary housing/work site.

Homefull Emergency Action Response Team

Theresa Nolan	(937) 262-4609
Greg Laravie	(937) 581-3244
Chandler Patterson	(937) 260-7166

Additional Resources

The American Red Cross

- Dayton Chapter: 370 W First St, Dayton OH 45402 (937) 222-6711
- Columbus Chapter: 995 E Broad St, Columbus, OH 43205 (614) 253-2740
- Springfield Chapter: 1830 N. Limestone St., Springfield, OH 45503 (937) 399-3872
- State Emergency Management Agencies Ohio: Ohio Emergency Management Agency 2825 W. Dublin Granville Rd. Columbus, OH 43235 (614) 889-7150

PROGRAM ADMINISTRATION
Health and Safety/Emergency Situations & Response
(COA: ASE5, ASE6, ASE7; CSB: A7, E1)

Policy:
Homefull maintains accessibility, health safety and clean environments through both external and internal processes. Homefull maintains a commitment to this philosophy throughout the organization. Safety information and site-specific procedures are located at each facility where Homefull provides services.

Procedure:
Homefull provides safety training to all staff and volunteers upon hire and annually thereafter. These trainings include procedures for responding to a variety of situations and how to maintain a safe and secure environment for all those involved. These situations include:

- Bomb Threat (procedures below)
- Police and Medical Emergency (procedures below)
- Workplace Violence (separate policy)
- Power Outage and Lightning Storms (procedures below)
- Natural Gas Leak (procedures below)
- Floods (procedures below)
- Tornado Warning (procedures below)
- Earthquakes (procedures below)
- Fire Evacuation (procedures below)
- Mail and Suspicious Device Handling (procedures below)

Information that includes evacuation plans, phone numbers, and location of materials, are located at each site in the safety manual. These manuals are located with the first aid kits and readily available. Program Managers are responsible for maintaining accurate information at each location.

Health and Safety/Bomb Threat

In the event your facility receives a bomb threat by telephone, please adhere to the following procedures:

Telephone Call/Personal Notification Procedures

1. Person receiving call:
    - Records information as per Bomb Threat Checklist posted at each work station (See Attachment A).
    - Informs Safety Officer or Supervisor of call as soon as possible during

phone conversation

2. Safety Officer or Supervisor:
    - Calls 911 to report the bomb threat
    - Confers with law enforcement to determine if evacuation is appropriate and to identify staff who may assist in the building search.
    - If evacuation is deemed appropriate by law enforcement, Safety Officer/Supervisor/Designee will notify employees in affected area to evacuate.
3. Before evacuating, employees should quickly check their work areas for unrecognized or suspicious items. Do not touch any suspicious items but do report them to law enforcement and supervisor **after** exiting the building.
    - Use nearest exit and proceed to post-evacuation assembly point.
    - **Do not** use elevator and assist mobility-impaired as needed.
    - **Do not** use cell phones, computers, or two-way radios in or near the building until the "All Clear" has been given by law enforcement.
    - **Do not** reenter the building until the All Clear has been given by law enforcement.
    - Complete a Major Unusual Incident (MUI) report within 24 hours.

Mail and Suspicious Device Handling

In the event your facility receives suspicious or hazardous materials, please adhere to the following procedures:

- Do not continue to touch or handle the suspicious item.
- Notify the safety officer or supervisor of the suspicious item as soon as practicable.
- Safety officer, supervisor or designee calls 9-1-1 to report the suspicious item.
- Safety officer, supervisor or designee confers with emergency responders to determine evacuation is appropriate
- If evacuation is recommended, notify building occupants as directed by safety officials.
- Do not use cell phones, computers or two-way radios in or near the building until the "all clear" has been given by law enforcement.
- Do not turn off electrical devices such, i.e. lights, kitchen appliances, or computers.
- Upon evacuating, leave doors and windows open.
- Do not use elevators and assist mobility-impaired as needed.
- Evacuate at least 300 feet from building or where directed by safety officials.
- Report any missing persons.
- Upon exit, report any suspicious items observed during evacuation.
- Do not re-enter the building until given the "all clear" by safety officials.
- Complete a Major Unusual Incident (MUI) report within 24 hours.

Police & Medical Emergency

In the event of a medical emergency:

- Call 9-1-1.
- Locate the nearest first aid kit and take to the scene of the incident. Alert designated trained First Aid/CPR staff to assess the situation and begin required emergency intervention.
- Direct a staff member not needed for the delivery of First Aid/CPR to meet first responders outside the building to provide directions to the location of the incident.
- Direct a staff member not needed for First Aid/CPR to locate the Emergency Information Sheet, if applicable, for the injured person.
- Continue First Aid/CPR until emergency responders arrive and assume responsibility for the injured person.
- Provide a copy of the Emergency Information Sheet to first responders, if applicable.
- Complete a Major Unusual Incident (MUI) report within 24 hours of the incident.

In the event of a police emergency:

- Call 9-1-1.
- Assess the safety of staff and consumers on the scene.
- If dangerous conditions exist, direct staff and consumers to leave the area immediately.
- If appropriate, alert delegated staff to assist in de-escalating the situation.
- Direct a staff member to meet policy outside of the building and provide directions to the incident.
- When police arrive, brief them on the situation and stay on the scene until directed to leave.
- Complete a Major Unusual Incident (MUI) report within 24 hours.

Non-Emergency Phone Numbers

Dayton Police Department	937-333-2677
Dayton Fire Department	937-333-4500
Montgomery/Greene County Local Emergency Response Council Coordinator	937-224-8934
Dayton Regional Hazardous Materials Response Team	937-512-5103
VA Police Department	937-262-2160
Federal Bureau of Investigation	937-222-7485
Montgomery County Sheriff's Office	937-225-4357
National Weather Service	937-383-0031
Ohio EPA Southwest District	937-274-6063
Ohio Emergency Management Agency	614-889-7150
Ohio Poison Control	800-222-1222

Ohio State Highway Patrol – Montgomery County	937-548-2151
Public Utilities Commission of Ohio Haz-Mat Division	800-686-7826
State Fire Marshall	614-752-8200
Columbus Police Department	614-645-4545
Columbus Fire Department	614-221-3132
Ohio EPA 24-hour emergency hotline	800-282-9378
Moraine Police Department	937-535-1166
Moraine Fire Department	937-535-1120

Local Hospitals

Dayton Children's Medical Center	937 641-3000
Grandview Hospital	937-723-3200
Kettering Medical Center	937-298-4331
Miami Valley Hospital	937-208-8000
Southview Hospital	937-401-6000
Sycamore Hospital	937 866-0551
Columbus Nationwide Children's Hospital	614-722-2000
OhioHealth Riverside Hospital	614-566-5000
Ohio Hospital for Psychiatry	614-664-3757
OSU Wexner Medical Center - University Hospital	614-293-8000

Power Outages

Power outages and a loss of utilities is a common occurrence. Take these steps to mitigate the impact of the loss of these services:

- Notify supervisor, property manager, or landlord, as applicable, to report power outage.
- Contact local electric company, as directed.
- If dangerous conditions exist and evacuation is required, direct occupants to nearest exits. Proceed to post-evacuation assembly point.
- If emergency lighting is not available, use a flashlight or cell phone to assess the situation. Do not use candles.
- Assist mobility-impaired, as needed.
- Turn light switches to the "off" position; unplug electrical equipment, especially computers.
- If trapped on an elevator, remain calm, reassure others, and use the emergency phone or a cell phone to notify rescue personnel of your location.

- Keep yourself and others at least 10 feet away from downed power lines. Consider all lines energized and dangerous.
- If a downed power line falls on your vehicle, stay in the vehicle and use your cell phone or car horn to alert others to your location.

Severe Lightning Storms
In the event of a severe storm remain calm and take the following steps:

- If lightning is seen and thunder is heard, stay inside for at least 30 minutes after last thunder clap.
- If unable to go inside, avoid natural lightning rods such as tall, isolated trees in an open area; avoid hilltops and open fields.
- Monitor current weather conditions from local media via television, radio or cell phone.
- Avoid using corded electrical devices. Unplug all electrical appliances, especially computers.
- Plumbing fixtures conduct electricity, do not wash your hands or take a shower.
- If in a vehicle, avoid touching metal or other surfaces that conduct electricity inside or outside the vehicle.

Gas Leak
In the event of a natural gas leak, please adhere to the following procedures:

- If you smell natural gas, notify other occupants and evacuate the building immediately.
- Do not turn on or off any lights.
- Do not turn on or off any appliances
- Do not use any telephone or cell phones in the building
- Do not sound the fire alarm.
- Call line 9-1-1.
- Complete a Major Unusual Incident (MUI) report within 24 hours.

Floods
Floods are one of the most common hazards in the United States., and can happen anywhere, at any time. Rain storms or river flooding may not be the only precursor of a flood. Breakage of water lines, or damaged sustained by dams or other water storage areas may result in the release of large amounts of water.

If a flood is likely in your area determine through the National Weather Service the level:

- Flood Watch – Flooding is possible, be prepared to evacuate
- Flood Warning – Flooding is already occurring or will occur soon. Take precautions as once. Be prepared to move to higher ground.
- Be aware that flash flooding can occur. If there is any possibility of a flash flood, move immediately to higher ground.

For all flooding whether natural or due to plumbing or mechanical failure, staff will alert all building occupants by verbally announcing the danger.

If you must evacuate:

1. Call 9-1-1 to alert authorities of the situation.
2. If practicable, turn off utilities at the main switch anddisconnect electrical appliances.
3. **Do not** touch any electrical appliance if you are in direct contact with water or you are wet.
4. Assist mobility-impaired, as needed, in exiting the flooded area.
5. Do not walk through moving water. Six inches of moving water can cause you to fall.
6. Do not drive into flooded areas. If floodwaters rise around your car, abandon the car and move to higher ground if you can do so safely.
7. Notify the Safety Officer who will notify the building maintenance supervisor.
8. Assure that all consumers are able to access safe transportation elsewhere if Homefull must close its facility for repair.0

Tornado Warning

When the National Weather Service issues a tornado warning onsite staff will alert building occupants by verbal announcement or telecommunications.

- Agency administration will send a One-Call alert to staff in the affected area.
- Safety officer, supervisor, or designee should direct occupants in affected areas to proceed to the nearest designated tornado shelter area within the building.
- Occupants who choose to shelter in place should be directed to shelter in an inner-room away from windows, doors, or outside walls.
- The elevator should not be used unless critical to the transport of mobility-impaired.
- Assist mobility impaired, as needed.
- Direct occupants to remain in the building until given the “all clear” by staff or safety officials.
- If staff encounters adverse driving conditions as a result of the weather, staff should exercise due caution, refrain from further driving, if practicable, seek shelter as applicable, and immediately and notify a supervisor of the situation.

Actions Following Tornado:

1. Call 9-1-1 to report injuries.
2. Exit any unsafe structure and do not re-enter until given the “all clear” by safety officials.
3. Proceed to designated post-evacuation assembly area, or where directed by safety officials. Report missing persons to safety officials.
4. Administer first aid, as needed. Do not move injured persons unless dangerous conditions

exist.
5. Be aware of natural gas leaks.
6. Keep yourself and others away from downed power lines. Consider all power lines energized and dangerous.
7. Follow directives of safety officials and HEART members.

Primary Tornado Safety Shelter Location: See *Emergency Procedures* tab in site-specific Health and Safety Manual.

Secondary Tornado Safety Shelter Location: See above.

Earthquakes

In the event of an earthquake, remain calm and take the following steps:

1. DROP to the floor onto your knees and make yourself small, where possible. This will prevent you from falling and to prevent injuries from your hands, feet, arms, and legs.
2. Take COVER under a nearby strong table or desk, if possible. This is to protect the parts of your body that are most vulnerable to serious injury (head, neck, and chest) from falling objects.
3. HOLD ON to your cover until the earthquakes shaking stops. Your cover may move with the shaking of the earthquake. Holding on to your cover will help keep you protected.
4. Be aware that fire alarms and sprinkler systems frequently activate during an earthquake, even if there is no fire.
5. Unless dangerous conditions exist, do not attempt to evacuate the building until it is safe to do so.
6. Stay away from window or tall cabinets or shelving that could fall.
7. Assist persons with injuries or mobility-impaired as practicable until emergency personnel are on scene.
8. Do not use elevators.
9. If evacuation is necessary, proceed to designated post-evacuation assembly area, or where directed by safety officials. Report missing persons to safety officials.
10. Take first-aid kit and emergency supplies, if safely accessible.
11. If in an automobile, stop as soon as possible in an open area away from buildings, power lines, and streets. Remain in your vehicle for shelter.
12. If outdoors, stay away from buildings, utility poles, and other structures. Keep away from downed power lines.

Following the earthquake:

1. Expect and prepare for potential aftershocks. Each time you feel an aftershock, DROP, COVER, and HOLD ON.
2. Watch for falling objects or exposed electrical lines, and be prepared for damaged stairways.

3. Stay clear of hydrants and elevated walkways.
4. Report building, plumbing, electrical, or other damage to safety officials.
5. Safety officials will conduct a search for persons who may be missing, trapped or reluctant to leave. Be prepared to assist, as needed.
6. Do not re-enter the building until given the "all clear" by safety officials.

Inclement Weather Driving
Staff is responsible for monitoring local weather conditions and notifications to determine if adverse driving conditions exist. (In the event of work delays or closures see *Emergency Weather Agency Response Plan*.)

Adverse driving conditions refer to weather or road conditions that are likely to cause safety hazards for staff and other drivers on the road. Many events could be considered an adverse driving condition, including but not limited to:

- Heavy rain, snow, sleet or ice
- Flooding
- Heavy fog
- High winds or tornados
- Dust storms
- Spills or slicks
- Prolonged heavy traffic volume
- Road closures due to accidents or other incidents
- A Level 1, 2, or 3 Snow Emergency issued by the sheriff's office of jurisdiction

If staff encounters an isolated adverse driving condition (i.e., pop-up heavy thunderstorm, flash floods, tornado, or wind gusts, etc.) staff should exercise due caution, refrain from further driving in the isolated adverse conditions, seek shelter as applicable, and immediately and notify a supervisor of the situation.

Staff should exercise due caution when assessing weather and road conditions to determine if they can safely complete work-related driving. Staff should report any adverse driving conditions concerns to their supervisor.

Fire Evacuation

Upon discovery of a fire – follow the specified evacuation procedures.

1. Activate the nearest fire alarm, if available, and dial 9-1-1 to report the fire.
2. Notify other building occupants of the fire and evacuation as you move toward an exit.
3. Do not take personal belongings.
4. Close doors as you evacuate.
5. Do not use the elevator when the fire alarm is sounding.

6. Do not assume the fire alarm is a false alarm.
7. Assist mobility-impaired occupants.
8. If you encounter smoke as you evacuate, stay as low as possible.
9. Do not talk during evacuation in order to hear any directives that may be given.
10. Proceed to the nearest exit.
11. Proceed to the designated post-evacuation assembly area, or where directed by safety officials. Report missing persons to safety officials.
12. Do not leave the post-evacuation assembly area until given the "all clear" by safety officials.
13. If unable to exit your office or room due to smoke or fire in the hallway, or your door is hot, call 9-1-1 to report your location and circumstances.
14. Open your window and call for help
15. Shout out at intervals to alert rescue personnel of your location.
16. Place wet towels or sheets on ventilation ducts and seal spaces under the door.
17. Place a wet towel or washcloth over nose and mouth to assist with breathing, as needed.
18. If electric power remains, use bathroom or stove fan to reduce smoke intake.
19. If your clothing catches fire, drop to the ground and roll to smother flames.
20. To assist another, smother the flames with a blanket or other suitable items, then drench the person/clothing with water. Seek immediate medical assistance.
21. Use a portable fire extinguisher only if you have been trained, and only in the following conditions:
    - The fire is confined to a small area, and is not growing
    - The room is not filled with smoke.
    - All occupants has exited the building
    - The fire department 9-1-1 has been called.
22. Remember the word PASS when using a fire extinguisher:
    - Pull the pin and hold the extinguisher with the nozzle pointing away from you.
    - Aim low. Point the extinguisher at the base of the fire.
    - Squeeze the lever slowly and evenly.
    - Sweep the nozzle from side to side.

Fire Prevention

Staff should conduct an inspection of their own areas at least once per quarter. The following should be noted:

1. Smoking is prohibited in all buildings. Smoking includes any inhalant device such as a vape or other electronic smoking device as well as any lighted or heated smoking device.
2. Do not overload outlets or run extension cords under carpets.
3. Report broken or defective electric fixtures, switches, or outlets to building management.
4. Discontinued until proper repairs are made.
5. Report broken exit lights or alarms to building management.
6. Do not block or prop open fire doors. .
7. Check fire doors for automatic closing devices and latching hardware.

8. Fire exit doors must remain unlocked
9. Maintain clear aisles and exit ways.
10. Remove excessive combustible storage and trash..
11. Familiarize yourself with location and use of fire extinguishers.
12. Fire extinguishers should be easily accessible.
13. Report missing, used, or damaged fire extinguishers to building management.

All sites will be maintained in a clean and orderly manner. Preventative maintenance will be performed by self-inspection (conducted by the designated safety officer at each site) to identify existing or potential maintenance problems that pose safety hazards. These inspections will focus on examination of the area's lighting, physical accessibility, and emergency equipment. If a problem is noted, it will be reported to program supervisor and building management.

Storage areas will also be kept clean and free of clutter. These areas will be inspected regularly. The use of freestanding wood burning stoves or un-vented kerosene, gas, or oil heaters is prohibited.

Safety Drills
Safety drills will be conducted on the following schedule:

- Quarterly-congregate residential sites
- Annually-administrative offices

All safety drills, or incidents involving evacuation of staff or clients, will be documented using the *Safety Drill Report.* Completed reports will be uploaded to Dropbox HF H&S Committee *Safety Drills.*

PROGRAM ADMINISTRATION
Health and Safety/Emergency Procedures/Workplace Violence
(COA: ASE7)

Policy:
Violence in the workplace is a serious safety and health issue. Its most extreme form, homicide, is the fifth-leading cause of fatal occupational injury in the United States. According to the Bureau of Labor Statistics Census of Fatal Occupational Injuries (CFOI), out of a total of 4,678 fatal work injuries 463 were workplace homicides in 2012 in the United States. Workplace Violence may be a personal assault or a verbal threat. These situations usually happen very quickly and there is very little warning given before it occurs. The only warning you may receive during a workplace violence incident is the sound of gunfire, scuffling, screaming or other employees yelling a warning.

Procedure:
A. Hostage Situation
If you are in a building where a hostage situation occurs:

- If able, leave the immediate area using the nearest exit then call 9-1-1.
- If unable to leave, seek shelter in an office or closet by locking and barricading the door.
- While speaking with 9-1-1, be prepared to give the location of the incident, number of hostage takers, descriptions, weapons used, and number of hostages. Do not hang up until told to do so.
- Remain calm and follow the hostage taker's instructions.
- Be patient.
- Do not draw attention to yourself by complaining, crying, making comments, hostile looks or sudden movements.
- Speak only when spoken to. Be polite.
- Do not attempt escape unless there is an extremely good chance of survival.
- Be alert and try to make note of physical descriptions and voice patterns.
- Avoid ideological or political discussions with the hostage taker.

In a hostage rescue situation:

- Do not run unless told to do so by law enforcement.
- Stay low, seek cover.
- Law enforcement be very aggressive with you. Do not resist.

B. Active Shooter Situation
Active Shooters can be disgruntled employees, consumers, visitors, an acquaintances of a current or former employee, or strangers. Active Shooters may target a specific person,a group, or random individuals, often with the intent of killing as many people as possible. Active Shooters DO NOT anticipate escaping or even surviving.

If the Active Shooter is outside your building:

- Lockdown
- Proceed to a room that can be locked.
- Close and lock all doors and windows.
- Turn off all lights.
- Remain calm and keep quiet.
- Get low, seek protective cover, and stay out of view.
- Call 9-1-1 and do not hang up until told to do so.
- Remain in place until given the “all clear” by law enforcement.
- Confirm police identity before exiting locked room.

If the Active Shooter is in the building:

- Run. If there is an escape path, evacuate the building.
- Use doors or windows to escape.
- Leave belongings behind (take your cell phone).
- Help others escape, if possible.
- As you evacuate the area prevent others from entering, “run, he’s got a gun!”
- Do not attempt to move or treat wounded persons.
- Once outside, keep moving and find cover.
- Keep hands visible when encountering responding law enforcement.
- Obey instructions of law enforcement.
- Police may be very aggressive towards you. Obey all commands.
- Don’t ask police questions as you flee however be prepared to answer questions.
- Once you reach a safe location you may be held there by law enforcement until the situation is under control and all witnesses have been identified and questioned.
- Pre-determined post evacuation assembly points may not be safe in an active shooter situation.
- Do not leave until law enforcement has instructed you to do so.
-

If evacuation is not possible:

- Hide. The hiding place should..
- Be out of the shooter’s view.
- Provide protection if shots are fired in your direction.
- An office or room with closed and locked doors.
- Ideally, not trap or restrict your options for future movement.

- The ability to prevent shooter’s entry by locking or barricading the door with available furniture.
- Take adequate cover. Get low behind walls, desks, chairs, tables, etc.

- Silence cell phones and keep quiet.
- Turn off any source of noise.
- Note any signage on exterior windows or doors to be used for police reference.
- If the active shooter is nearby, call 9-1-1, only if possible, to alert police to shooter's location.
- If you cannot speak leave the line open so the dispatcher can listen.
- Scan the room for weapons of opportunity.
- Be prepared to fight, if necessary.

As a last resort and your life is in imminent danger:

- Fight. Try to incapacitate the active shooter.
- Use any weapon available, chair, fire extinguisher, metal coffee pot, hot fluids, etc.
- Strategize with others.
- Commit to your actions. Be as aggressive as possible.
- Throw or strike with items. Yell.
- Don't fight fair.

If you and the active shooter are outside:

- Run. Move away from the active shooter and/or the sound of gunfire.
- As you flee warn others to flee or take immediate cover.
- Seek cover behind brick or concrete walls, large trees, parked cars, etc.
- Call 9-1-1 when safe to do so.
- Note: your proximity to the shooter may require you take immediate aggressive action toward the shooter.

PROGRAM ADMINISTRATION
Health and Safety/Emergency Procedures/Great Call
(COA: ASE7)

Policy:
During non-traditional business hours (outside of 9-5 on weekdays and all weekend shifts), many of the Homefull Permanent Supportive Housing programs have Engagement Specialists or contract workers (Ayres Staffing) who work on their own without management on site. In order to increase security measures and provide ease of access to help if needed, Homefull policy requires that each PSH site be equipped with a GreatCall *Splash* device for the on duty Engagement Specialist or contract workers to carry with them during their shift. Engagement Specialists or contract workers are trained on appropriate use and abilities of the device. The GreatCall *Splash* device gives Homefull staff access to two-way communications with 5Star Medical Alert Service. The service provides immediate 24 hour access to trained 5Star staff that can provide assistance in uncertain or unsafe situations as well as medical emergencies.

Procedure:
Homefull has one GreatCall *Splash* device each at Ohio Commons, Iowa Avenue, the Family Living Center, and River Commons. The device can be used anywhere cellular phone service is available. The one-touch Call Button gives staff quicker access to emergency services than a cellular phone allowing staff to obtain additional information, render immediate medical assistance, evacuate clients, or deescalate a situation. Each device contains GPS and a site-specific serial number which identifies your location. Program Managers are responsible for implementing site specific policy for device safekeeping, charging, and exchange with oncoming and outgoing staff. Program managers will also train new staff in device usage.

All Engagement Specialists and contract workers will receive training/instruction on using GreatCall. Upon completion of training, 2nd and 3rd shift and weekend staff will be required to carry the device during their shift. The device can summon emergency assistance from police, fire, or EMS by utilizing the 9-1-1 feature or by requesting assistance from 5Star staff. Additionally, the device can be utilized to alert 5Star staff to a suspicious or uncertain situation at a program location.

When utilizing the device Homefull staff should remain calm and speak normally into the microphone while describing the circumstances in plain language, e.g., "I have a female complaining of chest pains and trouble breathing." Or, "There are two males fighting in the lobby, please send the police."

Any staff person who utilizes the device during their shift will notify the On-Call Program Manager and document the usage in the site Daily Log and/or a Major Unusual Incident (MUI) form, as applicable. Staff who are in doubt whether or not to use the device are encouraged to call 5Star and advise them of the circumstances.

PROGRAM ADMINISTRATION
Obtaining Emergency Medical Services
(COA: ASE7)

Policy:
Homefull will facilitate the provision of life sustaining services in the event that a medical emergency occurs while a consumer of Homefull is receiving services by a Homefull staff person(s).

Procedure:
All staff members are aware of how to obtain emergency medical services, both at the office and in the community. If there is any question, the appropriate emergency medical personnel will be notified by dialing 911

PROGRAM ADMINISTRATION
Reporting Suspected Child Abuse/Neglect
(CSB: F12)

Policy:
The staff of Homefull evaluate all incidents where child abuse or neglect is suspected or alleged and report all incidents to applicable legal and/or child protective authorities as required by state and/or local laws.

Procedure:
Case Management staff who are acting in their official or professional capacity and have reason to believe that a child less than eighteen years of age or a mentally handicapped child under twenty-one years of age has suffered any wound, injury, disability, or condition of such a nature as to reasonably indicate abuse or neglect of such child, shall immediately report to the CEO who shall cause reports to be made of such information to the County Department of Children's Services, or a municipal or county peace officer in the county in which the child resides or in which the abuse or neglect is occurring or has occurred.

Such reports are made by telephone or in person and are followed by a written report, if requested by the receiving agency or officer. The written report shall contain:

X The names and addresses of the child and his parents or person or persons having custody of such child, if known.

X The child's age and the nature and extent of the child's injuries, abuse, or neglect, including any evidence of previous injuries, abuse, or neglect.

X Any other information which might be helpful in establishing the cause of the injury, abuse, or neglect.

Any report made under O.R.C. (2151.42 and 2151.421) is confidential, and any person who permits dissemination of its contents is guilty of a misdemeanor.

PROGRAM ADMINISTRATION
Reporting Elder Abuse
(COA: ASE 6; CSB: F12)

Policy:
As a social service organization that works with adults of all ages, Homefull frequently serves clients who are elderly/senior citizens. It is the policy of Homefull to report any suspicion or evidence of elder abuse to the appropriate oversight organization as well as to report internally as appropriate and to document this in the client's record.

Procedure:
All Homefull staff, regardless of program assignment, receive training during orientation on duties as a mandated reporter. Homefull seeks to provide a supportive environment and includes information on our Safety First initiative in our Consumer Handbooks, given to all clients at first interaction with Homefull. When clients enter any PSH program they are provided a new copy and at this time their new Case Manager reviews key policies and program details. This information always includes safety protocol and building safety procedures.

At the first suspicion or evidence of abuse of an elderly client, Homefull staff will report this concern to their supervisor. Together with the supervisor, a decision will be made regarding reporting the information of the suspected elder abuse to the appropriate local authorities. All guidance from the local authorities will be followed.

The staff member reporting the situation will complete an incident report and will detail the concerns and the reporting of the suspected abuse in a case note in the client's record.

A safety plan will be established for follow up and the efforts being made to provide protection to the client.

PROGRAM ADMINISTRATION
Consumer Education of HIV, AIDS, Tuberculosis, and Hepatitis B and C
(COA: ASE1)

Policy:
AIDS and related immunodeficiency diseases are currently considered as being primarily acquired through sexual practices that can be modified to reduce the risk of exposure to pathogens.

Due to the increased likelihood of high-risk behaviors, including unprotected sexual activity, occurring by people who are under the influence of alcohol and other drugs or impaired due to mental illness, consumers of Homefull are provided education and educational materials concerning the impact of mind-altering chemicals in changing rational decision making.

Exposure to tuberculosis and Hepatitis Type B and C are also more likely to occur among individuals engaging in alcohol and other drug use or who have mental health problems.

Procedure:
All staff of Homefull are aware of the location of educational materials which can be provided to consumers. Materials given are reviewed by the consumer and staff member to ensure consumer understanding and allow a time for questions. Written educational material will be given to consumers after groups and at other education opportunities with groups and individually.

PROGRAM ADMINISTRATION
Prenatal Health Care & Parenting Skills
COA: HSCL6

Policy:
Homefull will assist pregnant consumers in receiving prenatal health care and will provide linkage to parenting education for clients that are family units.

Procedure:
At any point that a consumer discloses that they are pregnant while in treatment at Homefull, the Case Manager will document in the client record whether or not the consumer is receiving prenatal care in the community. If the consumer is receiving prenatal care, the provider's name, facility, address, and phone number will be documented in the client record.

If the consumer is not receiving prenatal care, the Case Manager will offer assistance in linking the consumer to a prenatal health care provider in the community. This interaction will be documented in a case note, along with the consumer's acceptance or refusal of such assistance. If the consumer accepts assistance with linkage, the Case Manager will document the above information regarding the new prenatal health care provider. If the consumer refuses assistance or continued involvement with their prenatal health care provider, this will be documented in the case note, along with any attempts to re-engage consumers in these services.

For all family households, Case Managers will include referrals to parenting education and skill building as part of community resource linkage. Homefull will maintain partnerships with providers in the local community that offer accessible parenting support. Any engagement in parenting education or parenting skills classes will be documented in the client record.

Homefull will engage in regular communication with the local Children's Services agency if a client/household is engaged in an active case. Case conferences of this vein will be documented in the client record.

As needed, Homefull will provide onsite space for pregnancy health education and parenting education if desired by a community partner to assist with access to these services.

PROGRAM ADMINISTRATION
Health and Safety/TB Testing
(COA: ASE8)

Policy:
In compliance with Homefull health and safety standards, all Homefull employees are required to have an annual TB test performed.

Procedures:
Employees may have the test completed by any certified Healthcare Professional, or the local Department of Public Health. Staff will be responsible for any insurance co-payments associated with a healthcare visit.

Most Departments of Health provide TB testing by appointment. Staff will need to return to the Department of Health in 2 to 3 days to have the test evaluated and receive test results.

All new hire employees will be required to have a TB test performed prior to the first day of employment.

All Homefull employees are required to be tested annually based on the date of their most recent test.

PROGRAM ADMINISTRATION
Health and Safety/Infection Control Plan
(COA: RPM1, ASE6, ASE7)

Policy:
Homefull follows Homefull's Infection and Exposure Control Plan and therefore, complies with all policies and procedures for the reporting of communicable, contagious, and infectious diseases as dictated by the Ohio Administrative Code 3701-3 as well as any other applicable federal, state, or local laws and regulations.

Procedure:
The CEO shall be responsible for overseeing the application of this policy.

All Homefull staff will receive training annually on Communicable Diseases Infection Control. Homefull will also adhere to all reporting requirements related to the reporting of communicable diseases in accordance with Chapter 3703-3 of the Administrative Code.

Chapter 3701-3 Communicable Diseases
3701-3-01 Definitions.

As used in Chapter 3701-3 of the Administrative Code:
(A) "Antimicrobial" means an agent that kills microorganisms or suppresses microorganism multiplication or growth.
(B) "Arthropod" means an organism of the phylum Arthropoda, such as an insect, spider, mite or tick.
(C) "Board of health" means the board of health of the city or general health district established by section 3709.01 of the Revised Code, or the authority having the duties of a board of health in any city as authorized by section 3709.05 of the Revised Code.
(D) "Bioterrorism" means the intentional use of any microorganism, virus, infectious substance, or biological product that may be engineered as a result of biotechnology, or any naturally occurring or bioengineered component of a microorganism, virus, infectious substance, or biological product, to cause death, disease, or other biological malfunction in a human, animal, plant, or other living organism as a means of influencing the conduct of government or intimidating or coercing a population.
(E) "Child care center" means any private home, institution, or public or private facility in which child care is provided for one or more infants, toddlers, pre-school children, and school children outside of school hours, during any part of the twenty-four hour day, by persons other than the parents or legal guardians of the children in care.
(F) "Department" means the Ohio department of health.
(G) "Diarrhea" means three or more loose stools in a twenty-four hour period.
(H) "Director" means the director of health or his or her designee.
(I) "Endemic" means the constant presence of a disease or infectious agent within a given geographic area.

(J) “Epidemic” or “outbreak” means the occurrence of cases of disease in numbers greater than expected in a particular population or for a particular period of time.
(K) “Exclude” means to bar from participation.
(L) “Event” means an important happening or occurrence that results from an actual or suspected act of bioterrorism, epidemic or pandemic disease, established or novel infectious agents, or biological or chemical toxins.
(M) “Food handler” means a person who prepares or serves food intended for human consumption.
(N) “Health care provider” means any person or government entity that provides health care services to individuals. “Health care provider” includes, but is not limited to, hospitals, medical clinics and offices, special care facilities, medical laboratories, physicians, dentists, physician assistants, registered and licensed practical nurses, emergency medical service organization personnel, and ambulance service personnel.
(O) “Health district” means a city or general health district as created by Chapter 3709 of the Revised Code.
(P) “Incidence” means the number of new cases of a disease occurring during a specified interval of time in a defined population.
(Q) “Infected individual” means a person whose body harbors a specific microorganism capable of producing disease, whether or not the person is experiencing signs or symptoms of the disease.
(R) “Isolation” means the separation of an infected individual from others during the period of disease communicability in such a way that prevents, as far as possible, the direct or indirect conveyance of an infectious agent to those who are susceptible to infection or who may spread the agent to others.
(S) “Pandemic” means an epidemic disease that is occurring throughout a very wide area, usually several countries or continents, and usually affecting a large proportion of the population.
(T) “Poison prevention and treatment center” or “center” means an entity designated as a poison prevention and treatment center by the director of health under section 3701.20 of the Revised Code.
(U) “Period of communicability” means the interval during which an infected individual or animal is shedding the specific microorganism of a communicable disease in such a manner that those who are susceptible could acquire the infection.
(V) Mammal means a warm blooded animal, other than a human being, usually with hair, that gives birth to live young, which are fed with milk secreted by the female mammary gland.
(W) “Quarantine” means the restriction of the movements or activities of a well individual or animal who has been exposed to a communicable disease during the period of communicability of that disease and in such a manner that transmission of the disease may have occurred. The duration of the quarantine ordered shall be equivalent to the usual incubation period of the disease to which the susceptible person or animal was exposed.
(X) “Sensitive occupation” means direct food handling, direct patient care, the handling of food or provision of direct care to children in a child care center, or any other occupation which provides significant opportunity for an infected individual to transmit infectious disease agents.
(Y) “Sexually-transmitted disease” or “venereal disease” is an infectious disease commonly contracted through sexual contact such as chancroid, chlamydia, gonococcal infection, granuloma inguinale, human immunodeficiency virus infection, lymphogranuloma venereum, or syphilis.

(Z) “Surveillance” means, in the public health service, the systematic collection, analysis, interpretation, and dissemination, of health data on an on-going basis, to gain knowledge of the pattern of disease occurrence and potential in a community in order to control and prevent disease in the community.
(AA) “Susceptible person” means a person that, when exposed to an infectious microorganism, may not possess sufficient resistance to prevent contracting the infection or disease.

3701-3-02 Diseases to be reported.
The diseases listed in this rule and classified as class “A”, class “B”, and class “C” are declared to be dangerous to the public health and are reportable. The occurrence of cases or suspected cases of a disease classified as class “A”, class “B”, or class “C” shall be reported, in detail, by health care providers and laboratories to the board of health on forms as prescribed and provided by the director and shall be reported in accordance with this rule and Chapter 3701-3 of the Administrative Code.
(A) The following diseases are classified as class “A” – diseases of major public health concern because of the severity of disease or potential for epidemic spread and shall be reported immediately via telephone in accordance with rules 3701-3-03, 3701-3-04, and 3701-3-05 of the Administrative Code:
(1) Anthrax
(2) Botulism, food borne;
(3) Cholera;
(4) Diphtheria;
(5) Influenza “A” – novel virus infection;
(6) Measles;
(7) Meningococcal disease;
(8) Plague;
(9) Rabies, human;
(10) Rubella (not congenital);
(11) Severe acute respiratory syndrome (“SARS”)
(12) Smallpox;
(13) Tularemia
(14) Viral hemorrhagic fever (“VHF”);
(15) Yellow fever; and
(16) Any unexpected pattern of cases, suspected cases, deaths or increased incidence of any other disease of major public health concern, because of the severity of disease or potential for epidemic spread, which may indicate a newly recognized infectious agent, outbreak, epidemic, related public health hazard or act of bioterrorism.
(B) The following diseases are classified as class “B” and shall be reported in accordance with this rule and rules 3701-3-03, 3701-3-04, and 3701-3-05 of the Administrative Code:

(1) Diseases of significant public health concern needing timely response because of potential for epidemic spread shall be reported by the end of the next business day after the case or suspected case presents:

(a) Arboviral neuroinvasive and non-neuroinvasive diseases:
(i) Eastern equine encephalitis virus disease;
(ii) LaCrosse virus disease (other California serogroup virus disease);
(iii) Powassan virus disease;
(iv) Encephalitis virus disease;
(v) West Nile virus infection;
(vi) Western equine encephalitis virus disease;
(vii) Other arthropod-borne disease;
(b) Chancroid;
(c) Coccidioidomycosis;
(d) Cyclosporiasis;
(e) Dengue;
(f) E. coli O157:H7 and Shiga toxin-producing E. coli (STEC);
(g) Granuloma inguinale;
(h) Haemophilus influenzae (invasive disease);
(i) Hantavirus;
(j) Hemolytic uremic syndrome ("HUS");
(k) Hepatitis A;
(l) Hepatitis B (perinatal);
(m) Influenza-associated pediatric mortality
(n) Legionnaires' disease;
(o) Listeriosis;
(p) Malaria;
(q) Meningitis;
(i) Aseptic (viral);
(ii) Bacterial; (r) Mumps; (s) Pertussis;
(t) Poliomyelitis (including vaccine-associated cases); (u) Psittacosis; (v) Q fever;
(w) Rubella (congenital);
(x) Salmonellosis;
(y) Shigellosis;
(z) Staphylococcus aureus, with resistance or intermediate resistance to vancomycin ("VRSA", "VISA");
(aa) Syphilis;
(bb) Tetanus;
(cc) Tuberculosis ("TB"), including multi-drug resistant tuberculosis ("MDRTB"); and
(dd) Typhoid fever.
(2) Diseases of significant public health concern shall be reported by end of the business week in which the case or suspected case presents:
(a) Amebiasis;
(b) Botulism;
(i) Infant; (ii) Wound;
(c) Brucellosis;

(d) Campylobacteriosis;
(e) Chlamydia infections (urethritis, epididymitis, cervicitis, pelvic inflammatory disease, neonatal conjunctivitis, pneumonia, and lymphogranuloma venereum);
(f) Creutzfeldt-Jakob disease ("CJD");
(g) Cryptosporidiosis;
(h) Cytomegalovirus ("CMV") (congenital);
(i) Ehrlichiosis/anaplasmosis;
(j) Giardiasis;
(k) Gonococcal infections (urethritis, cervicitis, pelvic inflammatory disease, pharyngitis, arthritis, endocarditis, meningitis and neonatal conjunctivitis);
(l) Hepatitis B (non-perinatal);
(m) Hepatitis C;
(n) Hepatitis D (delta hepatitis);
(o) Hepatitis E;
(p) Herpes (congenital);
(q) Influenza-associated hospitalization;
(r) Leprosy ("Hansen Disease");
(s) Leptospirosis;
(t) Lyme disease;
(u) Meningitis, including other bacterial;
(v) Mycobacterial disease, other than tuberculosis ("MOTT");
(w) Rocky Mountain spotted fever ("RMSF");
(x) Streptococcal disease, group A, invasive ("IGAS");
(y) Streptococcal disease, group B, in newborn;
(z) Streptococcal toxic shock syndrome ("STSS");
(aa) Streptococcus pneumoniae, invasive disease ("ISP");
(bb) Toxic shock syndrome ("TSS");
(cc) Trichinosis;
(dd) Typhus fever;
(ee) Varicella;
(ff) Vibriosis; and
(gg) Yersiniosis.
(C) The following are classified as class "C" and shall be reported by the end of the next business day in accordance with this rule and rules 3701-3-03, 3701-3-04, and 3701-3-05 of the Administrative Code unless paragraph (C)(7) of this rule applies -outbreak, unusual incidence, or epidemic of other infectious diseases from the following sources:
(1) Community;
(2) Foodborne;
(3) Healthcare-associated;
(4) Institutional;
(5) Waterborne;
(6) Zoonotic;

(7) If the outbreak, unusual incidence, or epidemic, including but not limited to, histoplasmosis, pediculosis, scabies, and staphylococcal infections, has an unexpected pattern of cases, suspected cases, deaths, or increased incidence of disease that is of a major public health concern pursuant to paragraph (A)(16) of this rule, then such outbreak, unusual incidence, or epidemic shall be reported in accordance with paragraph (A) of rule 3701-3-05 of the Administrative Code.

(2) Compressed air illness;
(3) Silicosis;
(4) Occupational asthma;
(5) Pesticide poisoning;
(6) Cumulative trauma disorders including, but not limited to carpal tunnel syndrome and persistent and recurring tendinitis;
(7) Poisoning from heavy metals including, but not limited to, lead, nickel and cadmium;
(8) Asbestosis;
(9) Mesothelioma;
(10) Amputation of limb or digit; and
(11) Burn or burns resulting from exposure or contact to chemical, flame, or heat and of such severity as to cause admission into a hospital, burn unit, or other health care facility.

3701-3-03 Reportable disease notification.
(A) A health care provider with knowledge of a case or suspect case of a disease which is required by law to be reported, including all class “A”, class “B”, and class “C” categories of disease designated as reportable under rule 3701-3-02 of the Administrative Code, shall submit a case report in the manner set forth in rule 3701-3-05 of the Administrative Code .
(1) A health care provider may submit electronic reports in the manner approved by the director.
(2) Unless otherwise demonstrated, a health care provider who submits electronic reports in the manner approved by the director shall be presumed compliant with section 3701.23 of the Revised Code and rules 3701-3-02, 3701-3-04, and 3701-3-05 of the Administrative Code.
(B) Reports of cases and suspect cases shall include, but not limited to, the following:
(1) Case or suspect case information: name, diagnosis or suspected diagnosis, date of birth, sex, telephone number, and street address including city, state, and zip code.
(2) Health care provider information: name, telephone number, and street address including city, state, and zip code.
(3) Supplementary information as needed to complete official surveillance forms provided or set forth by the director.
(C) Any individual having knowledge of a person suffering from a disease suspected of being communicable is authorized to report to public health authorities all known facts relating to the case or incident.

3701-3-08 Release of patient's medical records.
Any person, hospital, clinic, agency or other institution or facility providing care or treatment to an individual suffering from a communicable disease which is required to be reported under Chapter 3701.

of the Revised Code and the rules adopted thereunder by the public health council, or a disease that the director requires special inquiry be made under sections 3701.13 and 3701.14 of the Revised Code, shall, upon written request by the director provide access to the patient's medical record to the director during an investigation of such disease.

3701-3-13 Isolation requirement.

A person infected with one of the following specified diseases or conditions shall be isolated as set forth in this rule:

(A) Amebiasis: a person with amebiasis who attends a child care center or works in a sensitive occupation shall be excluded from the child care center or work in the sensitive occupation and may return after diarrhea has ceased and three follow-up stool specimens are negative for Entamoeba histolytica.

(B) Campylobacteriosis: a person with campylobacteriosis who attends a child care center or works in a sensitive occupation shall be excluded from the child care center or work in the sensitive occupation and may return when the following conditions are met:

(1) A child may return to a child care center after his or her diarrhea has ceased.

(2) A person may return to work in a sensitive occupation after diarrhea has ceased, provided the person's duties do not include food handling.

(3) A food handler may return to work only after diarrhea has ceased and one of the following conditions are met:

(a) Forty-eight hours of effective antimicrobial therapy; or

(b) Two consecutive follow-up stool specimens are negative for Campylobacter.

(C) Chickenpox: a person with chickenpox shall be isolated, including exclusion from school, child care center, and public places until the sixth day after onset of rash, or until all lesions are dry. Contagiousness may be prolonged in patients with altered immunity. Persons with chickenpox shall avoid contact with susceptible persons.

(D) Cholera: a person with cholera who attends a child care center or works in a sensitive occupation shall be excluded from the child care center or work in the sensitive occupation and may return when the following conditions are met:

(1) A person may return to work in a sensitive occupation after diarrhea has ceased, provided that his or her duties do not include food handling.

(2) A food handler may return to work after diarrhea has ceased and two consecutive follow-up stool specimens are negative for Vibrio cholerae.

(2) A food handler may return to work after diarrhea has ceased and after three consecutive follow-up stool specimens are negative for Cryptosporidium.

(E) Diarrhea, infectious or of unknown cause: a person with diarrhea, of infectious or unknown cause, who attends a child care center or works in a sensitive occupation shall be excluded from the child care center or work in the sensitive occupation and may return only after diarrhea has ceased. A person with infectious diarrhea of known cause shall be isolated in accordance with the provisions of the rule set forth for the specified disease.

(F) Diphtheria: a person with diphtheria shall be isolated until two cultures, from both throat and nose, and additionally, in the case of cutaneous diphtheria, a culture from skin lesions, are negative for

diphtheria bacilli. Cultures shall be taken not less than twenty-four hours apart, and not less than twenty-four hours after cessation of antimicrobial therapy. If culturing is unavailable or impractical, isolation may be ended after fourteen days of effective antimicrobial therapy.
(G) Escherichia coli (E. coli) O157:H7, other enterohemorrhagic (Shiga toxin-producing) E. coli or hemolytic uremic syndrome (HUS): a person with Escherichia coli (E. coli) O157:H7, other enterohemorrhagic (Shiga toxin-producing) E. coli or hemolytic uremic syndrome (HUS) who attends a child care center or works in a sensitive occupation shall be excluded from the child care center or work in the sensitive occupation and may return after his or her diarrhea has ceased and after two consecutive follow-up stool specimens are negative for E. coli O157:H7 or other enterohemorrhagic (Shiga toxin-producing) E. coli.
(H) Giardiasis: a person with giardiasis who attends a child care center or works in a sensitive occupation shall be excluded from the child care center or work in the sensitive occupation and may return after diarrhea has ceased and one of the following conditions have been met:
(1) Seventy-two hours of effective antimicrobial therapy; or
(2) Three consecutive follow-up stool specimens are negative for Giardia.
(L) Hepatitis A: a person with hepatitis A who attends a child care center or works in a sensitive occupation shall be excluded from the child care center or work in the sensitive occupation until ten days after initial onset of symptoms.
(I) Measles: a person with measles shall be isolated, including exclusion from school or child care center, for four days following the onset of rash. Contagiousness may be prolonged in patients with altered immunity.
(J) Meningitis, aseptic, and viral meningoencephalitis, but not including arthropod-borne disease: a person with aseptic meningitis or viral meningoencephalitis shall be excluded from school or child care center until he or she is afebrile.
(K) Meningococcal disease: a person with meningococcal disease shall be isolated until twenty-four hours after the initiation of effective antimicrobial therapy.
(L) Mumps: a person with mumps shall be isolated, including exclusion from school or child care center, for five days after the onset of parotid swelling.
(M) Pediculosis: a person with body lice shall be excluded from school or child care center until twenty-four hours after application of an effective pediculicide. A person with head lice shall be excluded from school or child care center until after the first treatment with an effective pediculicide.
(N) Pertussis (whooping cough): a person with pertussis, who is not treated with effective antimicrobial therapy, shall be isolated, including exclusion from school or child care center, until three weeks after the onset of paroxysms. If effective antimicrobial therapy is given, the person shall be isolated for five days after initiation of antimicrobial therapy.
(O) Plague: a person with plague shall be placed in droplet isolation until completion of forty-eight hours of effective antimicrobial therapy.
(P) Rubella: a person with rubella shall be isolated, including exclusion from school or child care center, for seven days after the onset of the rash. Persons with congenital rubella shall be isolated until they are one year old unless nasopharyngeal and urine cultures after three months of age are repeatedly negative for rubella.

(Q) Salmonellosis: a person with salmonellosis who attends a child care center or works in a sensitive occupation shall be excluded from the child care center or work in the sensitive occupation and may return when the following conditions are met:
(1) A person may return to work in a sensitive occupation after diarrhea has ceased, provided that his or her duties do not include food handling.
(2) A person who is a food handler may return to work after diarrhea has ceased and after two consecutive follow-up stool specimens are negative for Salmonella.
(R) SARS (severe acute respiratory distress syndrome): a person with confirmed or suspected SARS shall be placed in airborne isolation until no longer considered infectious.
(S) Scabies: a person with scabies shall be isolated for twenty-four hours following initial treatment with an effective scabicide. A person with the manifestation of scabies known as "crusted scabies" shall be isolated until the mite can no longer be demonstrated on a scabies preparation.
(T) Shigellosis: a person with shigellosis who attends a child care center or works in a sensitive occupation shall be excluded from the child care center or work in the sensitive occupation and may return if diarrhea has ceased and after two consecutive follow-up stool specimens are negative for Shigella.
(U) Smallpox: a person with confirmed or suspected smallpox shall be placed in airborne isolation in a facility designated by the director. The patient's release from the facility can occur when all scabs have fallen off.
(V) Streptococcal infection: a person with a streptococcal infection shall be excluded from school or child care center for twenty-four hours after the initiation of effective antimicrobial therapy.
(W) Tuberculosis (TB): a person with infectious tuberculosis shall be isolated according to Chapter 3701-15 of the Administrative Code until the person has three negative AFB sputum smear results, collected eight to twenty-four hours apart (with at least one being an early morning specimen) and the person has responded clinically to an antituberculosis treatment regimen consistent with the results of any susceptibility testing performed and until the local authorized TB authority, as set out in section 339.72 of the Revised Code, or his or her designee approves that person's removal from isolation.
(X) Typhoid fever person works in a sensitive occupation shall be excluded from work and may return after the person is asymptomatic and after three consecutive follow-up stool specimens are negative for Salmonella Typhi.
(Y) Typhus: a louse infested person with typhus shall be isolated until twenty-four hours after application of an effective pediculicide for body lice and clothing and environment are free of body lice.
(Z) Viral hemorrhagic fever (VHF): a person with confirmed or suspected viral hemorrhagic fever shall be placed in airborne isolation until no longer considered infectious.
(AA) Yellow fever: a person with confirmed or suspected yellow fever shall be isolated to prevent access of mosquitoes to the patient for at least five days after onset of disease.
(BB) Yersiniosis: a person with yersiniosis who attends a child care center or works in a sensitive occupation shall be excluded from the child care center or work in the sensitive occupation and may return when the following conditions are met:

(1) A person may return to work in a sensitive occupation after diarrhea has ceased, provided that his or her duties do not include food handling.
(2) A food handler may return to work after diarrhea has ceased and two consecutive follow-up stool specimens are negative for Yersinia.

3701-3-14 Reporting requirements-poison control prevention and treatment centers and other health-related entities.
(A) For the purpose of this rule
(1) "Biological or chemical toxins" mean poisonous compounds produced by a microorganism or a poisonous chemical compound that pose a risk of human fatality or disability.
(2) "Novel infectious agents" mean agents that are unusual that pose a risk of human fatality or disability.
(3) "Other health-related entity" means an entity that employs health care providers, but that does not have an obligation to report events to the health district having jurisdiction in accordance with the requirements of Chapters 3701. and 3707. of the Revised Code.
(B) A poison control prevention and treatment center or other health-related entity shall report the following events:
(1) An unexpected pattern or increase in the number of telephone inquiries or requests to provide information about poison prevention and treatment and available services;
(2) An unexpected pattern or increase in the number of requests to provide specialized treatment, consultation, information, and educational programs to health care professionals and the public;
(3) An unexpected pattern or increase in the number of requests for information on established or novel infectious agents or biological or chemical toxins posing a risk of human fatality or disability that is relatively uncommon and may have been caused by bioterrorism.
(C) Unless provided otherwise, all reports required by paragraph (B) of this rule shall be submitted to the health commissioner of the health district having jurisdiction over the event. Poison control prevention and treatment centers and other health-related entities shall immediately report an event as specified in rule 3701-3-02 of the Administrative Code, to the extent known or suspected, or upon the request from the director in the manner specified in paragraph (B) of rule 3701-3-03 of the Administrative Code.
(D) As required by division (C) of section 3701.201 of the Revised Code, poison control prevention and treatment centers and other health-related entities shall report information regarding events as specified in this rule. A poison control prevention and treatment center or other entity that does not report events in compliance with this rule is subject to an administrative fine as specified in rule 3701-73-02 of the Administrative Code.
(3) "Prescription" means the same as defined in division (H) of section 4729.01. of the Revised Code.
(4) "Significant changes" means observations or occurrences of or related to medication usage that is, based on professional experience and judgment, too closely correlated to be attributed to chance.
(5) "Unexpected increase" means, based on past experience, an unforeseen change in the types, urgency, or volume of sales, inquiries or requests specified in this rule.
(B) All pharmacies and pharmacists shall immediately report information by telephone or electronically to the health commissioner of the health district having jurisdiction:

(1) Any prescription for medication used to treat a disease that is relatively uncommon and may have been caused by bioterrorism, or
(2) Significant changes in medication usage that may be caused by bioterrorism, epidemic or pandemic disease, or established or novel infectious agents or biological toxins posing a risk of human fatality or disability, or
(3) An unexpected increase in:
(a) The number of prescriptions issued for antibiotics;
(b) The number of prescriptions issued for medications to treat fever or respiratory or gastrointestinal complaints;
(c) The sales of or the number of requests for over-the-counter medication to treat fever, respiratory, or gastrointestinal complaints.
(C) Pharmacies and pharmacists shall submit reports required by this rule using forms and formats approved by the director. A pharmacy or pharmacist using an electronic reporting system or systems, to the extent approved by the director, is deemed to comply with the reporting requirements of this rule until such use is no longer considered active by the director.
(D) All health commissioners shall immediately report information received from pharmacies or pharmacists to the director.
(1) Health commissioner reports shall be submitted by telephone or by electronic means approved by the director.
(2) If a pharmacy has submitted an electronic report for over the counter medication sales as authorized by this rule and so advises the health commissioner, no further report is required.
(E) Upon receipt of a request from a health commissioner of the health district having jurisdiction, each pharmacy in the jurisdiction and for each location within the jurisdiction shall:
(1) Within ten business days of receiving such a request, identify an employee or employees of the pharmacy or a pharmacist or pharmacists employed at the pharmacy of who will be the point of contact for purposes of this rule.
(2) Within ten business days advise the health commissioner having jurisdiction of any change in the information of who will be responsible for being the point of contact for purposes of this rule.
(F) In consultation with the Ohio board of pharmacy, the director may publish a list of antibiotics and other medications that are required to be included in reports of significant changes in medication usage required by this rule.
(G) A pharmacy or pharmacist shall report information regarding events as specified in this rule. A pharmacy or pharmacist that does not report events in compliance with this rule is subject to an administrative fine as specified in rule 3701-73-02 of the Administrative Code.

GENERAL PREVENTION TECHNIQUES
Homefull will use simple infection control measures to help everyone prevent the spread of communicable disease. The techniques are not specific to any particular disease; they are good, common-sense prevention practices that should always be used.

- Most importantly, WASH YOUR HANDS. Perform hand hygiene.

- Maintain good personal hygiene. Do not share personal toilet articles (combs, brushes, razors, towels, etc) with anyone else.
- Do not share eating utensils or cigarettes.
- Keep your immunizations up-to-date.
- Eat a balanced diet and get plenty of rest and exercise.
- Cover your mouth when you cough or sneeze. Keep disposable tissues handy.
- Avoid touching your eyes or mouth if you are caring for someone with a cold or other infection.
- Handle food safely.
- Avoid cuts or punctures from sharp objects, such as needles, that may have been in contact with someone else's blood or body fluids. Needles that have been used by diabetics or others should be carefully disposed of in containers specifically designed for "sharps."
- Avoid unprotected sexual activity.

HAND HYGIENE GUIDELINES

Performing hand hygiene is the single most effective way to reduce the spread of infection.

Homefull will use hand hygiene:

- before handling food.
- before and after eating.
- before and after cleaning a wound.
- before and after smoking of any kind (includes lighted cigarettes/cigars/etc as well as electronic smoking devices and vapes).
- after handling raw food.
- after using the toilet or wiping nose.
- after contact with blood or body fluids/wastes.
- after handling soiled items or equipment (ex: after cleaning rooms or handling soiled linen).
- after removing gloves.

Hand washing

- Either liquid or bar soap can be used. Liquid soap containers should not be "topped up". Instead, rinse with hot water when empty then refill. Bar soap should be stored in racks which allow drainage of excess water (disease-producing organisms can survive in stagnant water).
- Disposable (paper) towels should be used in public washrooms. Individual cloth towels should not be shared.

Hand washing method

- Wet hands thoroughly with comfortably warm running water.
- Apply soap, then rub your hands vigorously for 10 to 15 seconds to create a lather.
- Wash all surfaces, including the backs of your hands and between fingers.
- Rinse your hands well under running water.
- Dry your hands well with a towel.

- Turn off the taps with a towel.

Consider posting hand washing reminder signs near all sinks.

Alcohol-based hand rubs

Alcohol-based products provide an acceptable alternative to soap and water. Alcohol-based hand rubs must contain a minimum of 60 per cent alcohol. This method may be used when soap and water are not readily available and hands are not visibly soiled.

Method for alcohol-based hand rubs

- Apply a small amount (2 to 3 ml – a drop the size of a dime) of product to the palm of one hand.
- Rub hands together, covering all hand surfaces, including fingernails, web spaces, thumbs and palms.
- The product usually dries within 15 to 20 seconds. Ensure hands are completely dry before performing another task.

NOTE: *Alcohol products are flammable.*

GUIDELINES FOR ENVIRONMENTAL CLEANING

Purpose

Homefull will work to minimize germs on environmental surfaces and thereby reduce the spread of infection to residents and staff.

Principles

- Cleaning products should:
  - be selected on the basis of effectiveness, acceptability, safety and cost;
  - be appropriate to the task;
  - be diluted and used according to manufacturer's instructions;
  - be stored in a safe manner; and
  - ***not be mixed*** inappropriately (ex: chlorine and toilet bowl cleaner combine to form a toxic gas)
- Surfaces must not show any visible soil before they are sanitized.
- Cleaning equipment should be maintained in a clean, dry state after use. Cloths, mop heads, etc., should be changed when soiled after use.
- Personal protective equipment (ex: gloves) should be available and used appropriately.
- Garbage should be contained and disposed of by usual methods. Sharp objects (such as needles) should be placed in approved, puncture-resistant containers to prevent puncture injuries or cuts to the skin.

Products for cleaning and sanitizing

- Cleaning with detergent and water is generally acceptable.

- Commercial household products are acceptable to sanitize environmental surfaces and should be used according to manufacturer's instructions.
- To prepare a noncommercial sanitizing solution, use unscented chlorine bleach:
    - for wiping cutting boards, surfaces, etc., mix one tablespoon (15 ml) in four liters (3.5 quarts) or water.
    - for immersing dishes, dishcloths, etc., mix one tablespoon (15 ml) in four liters (3.5 quarts) of water.

Method

- Cleaning should proceed from least to most soiled. Cleaning solutions should be changed when they appear dirty and/or after a spill cleanup.
- Cleaning primarily involves horizontal surfaces (ex: countertops, table tops, floors) and surfaces that are frequently handled (ex: door knobs, telephones, bathroom fixtures). Walls may require spot cleaning.
- Spills involving blood or body wastes should be cleaned up with disposable towels/cloths, which should be placed in a plastic bag for disposal in the regular garbage. The area involved should be cleaned with detergent and water and then sanitized with an appropriate product. Reusable gloves should be worn.

Cleaning schedules

- Cleaning schedules should be established according to the type of surface to be cleaned and the type of soiling that occurs. For example:
    - spills – clean immediately.
    - surfaces used for food preparation or diapering – clean after each use.
    - kitchen, bathrooms, playrooms – clean daily and as necessary.
    - resident rooms, living rooms, offices, appliances – clean weekly and as necessary.
    - mattresses, pillows, bedframes, bedroom furniture – clean between occupants.
    - household furniture, walls, carpets, etc. – follow a rotating schedule (monthly/yearly) and as necessary.
    - toys –.
    - reusable gloves – clean after each use.

Sanitizing is indicated for:

- food preparation surfaces
- diaper changing surfaces
- infant and toddler toys
- spill clean-up
- reusable gloves

SPECIFIC INFECTIOUS DISEASES

The following chart will assist staff and consumers to understand the spread (transmission) and

prevention of certain diseases. However, some infected persons may have mild symptoms or even no symptoms at all, but can still spread disease. Also, many diseases begin with the same symptoms and are most infectious in the early stages. **It is important to seek medical attention if someone is ill.** Consult with a physician or your local public health nurse for further information.

Communicable Disease Management Guidelines

These guidelines are intended to assist Homefull and its consumers to understand the spread and prevention of certain diseases. Note that some infected persons might have mild or no symptoms but are still able to spread an illness. Many diseases that begin with the same general symptoms (ex: cold, chicken pox, whooping cough) are highly infectious in the early course of the illness. Homefull staff are provided annual Infectious Control training.

Respiratory Infections

Prevention:

- Importance of good hand hygiene.
- Careful disposal of soiled tissue, diapers, etc.
- Cover mouth and nose when coughing, sneezing
- Immunization if disease is vaccine-preventable

Note: for information & policies on the Novel Coronavirus/COVID19 occurring in 2020, please see next policy for details.

Disease	**Transmission (How it is spread)**	**Symptoms**	**Infectious period/ Comments**
Common cold	• Person to person by sneezing, coughing • Indirectly via contaminated hands, objects	• Runny nose, sore throat, cough	Infectious from one day before to seven days after onset
Scarlet fever (caused by Group A Streptococcus bacteria)	• Person to person by sneezing, coughing • Rarely by indirect contact with objects	• Rash (feels like sandpaper) most often on the neck, chest, armpits, elbows, groin and thighs • There may be flushing of the cheeks and paleness around the mouth	Infectious until 24 hours after treatment has started
Strep throat (caused by Group A Streptococcus bacteria)	• Person to person	• Fever, sore throat, headache • Consult a physician as antibiotic treatment may be required	Infectious until 24 hours after treatment has started
Conjunctivitis (pinkeye)	• Person to person by direct and indirect contact with discharge from eye	• Redness, itching, pain and discharge from the eye • Treatment for infection is required if condition is caused by bacteria	Infectious for duration of illness or until 24 hours after treatment started

Mononucleosis (caused by Epstein-Barr virus)	• Person to person via saliva	• Fever, sore throat, enlarged lymph nodes, fatigue, weakness • Can last for several weeks • Any age group can get "mono" but illness most noticeable in young adults	• Illness is not very infectious • Virus may be shed for a long time after initial infection
Chickenpox (varicella zoster virus)	• Person to person via respiratory secretions • To a lesser extent from fluid in the blisters	• Sudden onset of fever, malaise • Rash with small blisters on top that become crusted and itchy • ***Vaccine preventable***	Infectious from two days before rash and until skin lesions have crusted
Shingles (herpes zoster)	• A reactivation of the latent virus that causes chickenpox • Spread occurs only from blister fluid • Only occurs in those who have previously had chickenpox • A person who has not had chickenpox can get the disease from someone else with a case of shingles	• Numbness, itching, or severe pain followed by clusters of blister-like lesions in a strip-like pattern on one side of the body • Pain can persist after the lesions heal	Infectious (causes chickenpox) from vesicle fluid until all lesions healed
Cytomegalovirus (CMV)	• Person to person by direct contact with body fluids such as blood, urine or saliva	• Most children have no symptoms when they become infected with CMV and most people eventually become infected • In older children, symptoms may include fever, sore throat, enlarged liver and malaise • CMV can be passed from mother to child before birth and may cause birth defects	

Meningitis (may be caused by bacteria, virus or fungus)	• Person to person by secretions from nose and throat	• Sudden onset of fever, vomiting, loss of energy, headache, stiff neck and back • *Viral:* Serious but rarely fatal; symptoms last seven to 10 days; full recovery in almost all cases • *Bacterial:* Can be serious and result in death or disability if not treated promptly; close contacts must be treated with antibiotics	• *Bacterial* meningitis – cases are no longer infectious after 24 hours of appropriate antibiotics • *Viral* meningitis – variable
Red Measles (rubeola)	• Person to person • Virus present in respiratory secretions	• Moderately high fever, cough, runny nose, inflamed eyes for one to three days before onset of rash • Rash begins as large red spots that join together • Rash starts on the face and spreads to entire body • Must see physician; physician must notify Public Health • Vaccine preventable	*Infectious for two days before onset of fever and cough until four days after onset of rash*
German Measles (rubella)	• Person to person • Virus present in respiratory secretions	• Mild fever, sore throat, swollen glands in neck • Rash consists of small red spots that start on scalp and face and spread rapidly over entire body • Vaccine preventable	*Infectious for a few days before onset of rash and seven days afterwards*
Whooping Cough (pertussis)	• Person to person • Bacteria present in respiratory secretions	• Begins with cold symptoms • Cough progresses to spasms that may result in vomiting • Vaccine preventable	• *Infections from onset of runny nose until three weeks after onset of spasm- like cough* • *Exclude until five days after start of appropriate antibiotics or three weeks after onset of cough*

Disease	Transmission (How it is spread)	Symptoms	Infectious period/ Comments
Mumps	• Person to person • Virus present in respiratory secretions	• Fever • Swelling of salivary glands causes cheeks and face to swell • ***Vaccine preventable***	Infectious for seven days before and nine days after onset of swelling
Hand, Foot and Mouth Disease	• Person to person • Virus present in respiratory secretions	• May have fever, headache • Red spots with small blisters on top may appear especially on hands, feet and inside mouth	• Most infectious before onset of rash • Can be excreted in feces/stool for some time
RSV – Respiratory Syntitial Virus	• Person to person • Virus present in respiratory secretions and on contaminated objects/surfaces	• Fever, runny nose, cough and sometimes wheezing • Common cause of bronchiolitis and pneumonia in babies under 12 months	Infectious until symptoms stop (usually eight to 15 days)
Hantavirus	• Rodents shed the virus in their urine, droppings and saliva • The virus is transmitted to people mainly when they breathe air contaminated with the virus	• Early symptoms include fatigue, fever and muHSCLe aches • May also be headaches, dizziness, chills and abdominal problems, such as nausea, vomiting, diarrhea and abdominal pain • Late symptoms include coughing and shortness of breath	• Cannot be transmitted from one person to another • Eliminate or minimize contact with rodents in your home, workplace, farm or campsite
Influenza	• Person to person • Virus present in respiratory secretions	• Fever, chills, cough, sore throat, headache, muHSCLe aches	Infectious until symptoms stop (three to five days)
Fifth's Disease (slapped cheek)	• Person to person • Virus present in respiratory secretions	• Mild fever, flu-like symptoms • A rash will appear one week after onset of symptoms. It looks initially like a "slapped cheek" and spreads to the rest of the body	Most infectious before onset of rash

Skin and Scalp Infections

Disease	Transmission (How it is spread)	Symptoms	Infectious period/ Exclusion
Head Lice	• Person to person • Requires close direct contact • To a lesser extent, spread can occur by sharing combs, brushes, headgear/hats	• Presence of lice and nits in the hair • Itchy scalp usually around the ears or nape of the neck	• Infectious until treated • Nit removal may be necessary to cure some cases
Scabies	• Person to person • Requires close direct contact	• Very itchy rash that usually appears on fingers, elbows, armpits and abdomen • Scabies requires treatment	Infectious until treated
Molluscum contagiosum	• Person to person by direct contact with the lesions	• Viral skin disease consisting of smooth-surfaced , firm and round papules • Lesions on children are usually on the face, trunk, and upper area of arms/legs	
Ringworm	• Direct contact with an infected person or animal • Direct contact with objects or surfaces contaminated with the fungus	• Flaky, itchy rash • On the scalp it may leave a flaky patch of baldness • On other areas the rash is ring like and may itch or burn	The fungus is no longer present when the lesion begins to shrink
Cold sores (Herpes simplex 1)	• Direct contact with the sores or saliva of an infected person	• Fever, runny nose • Painful sores on lips or in the mouth	Infectious for one week during first infection and five days during recurrent cold sores
Impetigo	• Person to person by direct contact	• Pustules or crusted rash on face or exposed parts of body (arms and/or legs) • Requires antibiotic treatment prescribed by a physician	Infectious from onset of rash until one day after start of treatment with antibiotics

Gastrointestinal Infections

Prevention:

- Importance of good hand hygiene, especially after using the bathroom and before preparing food
- Safe storage and food handling, cooking practices.

Disease	Transmission (How it is spread)	Symptoms	Infectious period/ Exclusion
E. *coli* 0157 (hamburger disease)	• Undercooked foods, especially ground beef • Bacteria may be in stool and can spread person-to-person by fecal-oral route	• Fever, diarrhea • May be blood in stool and cramps	• Infectious until diarrhea is gone • May continue to excrete germ for a period of time
Cryptosporidiosis	• Fecal-oral transmission • Ingestion of contaminated food or water	• Watery diarrhea and stomach ache • Nausea and vomiting • Fever	Infectious as long as cysts are excreted (usually for several weeks)
Salmonella	• Improperly prepared food, particularly eggs, poultry, beef and unpasteurized milk • Can also be spread person to person	• Diarrhea, fever • Occasionally blood in stool	• Infectious until diarrhea is gone • May continue to excrete germ for a period of time
Shigella	• Person to person • Contaminated food and water	• Diarrhea, fever • Blood and mucous in stool	• Infectious until diarrhea is gone • Negative stool cultures may be necessary due to highly infectious nature of germ
Campylobacter	• Undercooked chicken, pork, raw milk, contaminated water • Contact with infected pets	• Diarrhea, fever	• Infectious until diarrhea is gone • May continue to excrete germ for a period of time
Giardia (beaver fever)	• Parasite in stool • Person to person • Ingestion of feces-contaminated water	• Diarrhea, cramps, excessive gas • Do not drink water from unfiltered lakes and streams without treating it appropriately	• Infectious until diarrhea is gone • May require treatment

Hepatitis A	• Virus in stool • Person to person (fecal-oral) • Also from contaminated food and water	• Fever, loss of appetite, nausea, vomiting and jaundice • Children may have no symptoms • Immune globulin may be given to close contacts of cases	Infectious for one week after onset of jaundice
Rotavirus	• Person to person	• Fever and vomiting followed by watery diarrhea	Infectious until diarrhea is gone
Pinworms	• Eggs of the parasite (worm) are spread from person to person by contaminated hands • Eggs can survive for several weeks outside the body	• Itching around the anus or vagina • Many children have no symptoms • Requires medication prescribed by a physician	Infectious until treated

Sexually Transmitted Diseases

Disease	**Transmission (How is it spread)**	**Symptoms**	**Infectious period/ Exclusion**
Chlamydia	• Sexual contact with an infected partner	• *Females:* Discharge, itching, difficulty urinating, pelvic pain (more than 70% may not have symptoms) • *Males:* Discharge, itching, difficulty urinating (more than 50% may not have symptoms)	Infectious until treated with Azithromycin (an antibiotic), one gram given immediately
Gonorrhea	• Sexual contact with an infected partner	• Same symptoms as Chlamydia, but more noticeable and pronounced • More than 50% of infected persons may have no symptoms at all	Infectious until treated with appropriate antibiotics given immediately

Bloodborne

Disease	**Transmission (How it is spread)**	**Symptoms**	**Infectious period/ Exclusion**
HIV	• By contact with infected blood (sharing needles, blood transfusions) • Unprotected sexual intercourse with infected person • Mother to baby before or during birth	• Failure to gain weight, diarrhea, persistent infections, pneumonia	May be infectious for life

Hepatitis B	• Contact with infected blood (sharing needles, blood transfusions) • Unprotected sexual intercourse with infected person • From infected mother to baby before or during boabirth	• May show no symptoms • May cause liver disease • ***Vaccine preventable***	May be infectious for life
Hepatitis C	• Contact with infected blood (sharing needles, blood transfusions)	• May show no symptoms • May cause liver disease	May be infectious for life

Vector Borne

Disease	**Transmission (How it is spread)**	**Symptoms**	**Infectious period/ Exclusion**
West Nile Virus	• Main route of infection is through the bite of an infected mosquito • Mosquitoes become infected when they bite infected birds, which may circulate the virus in their blood for a few days	• Fever, headache, fatigue, body aches • Occasionally a skin rash on the trunk of the body and swollen lymph glands • Symptoms of severe infection include headache, high fever, neck stiffness, stupor, disorientation, coma, tremors, convulsions, muHSCLe weakness and paralysis	Preventive measures: • Protect yourself from mosquito bites • Reduce the number of mosquitoes in areas outdoors where you work or play by draining sources of standing water

PROGRAM ADMINISTRATION
Health and Safety/Coronavirus
(COA: ASE5, ASE6, ASE7)

***Policy*:**
In early 2020 the World Health Organization deemed the Novel Coronavirus, aka COVID-19, to be a pandemic. As such, federal and state officials established many precautions to assist in decreasing the spread of the virus. Homefull established new policies and practices in order to assist in preventing the spread to help keep our staff and clients safe. Additionally, HUD enacted several waivers related to the compromised service environment. Homefull implemented waivers offered and specific policies related to these waivers follow this policy.

Procedure:
Homefull enacted multiple educational methods of staff and clients early in the response to COVID-19 in all 3 primary geographic areas where services exist. These included posting informational signs from the CDC and local Public Health Departments about proper precautions related to reducing the spread of the virus. All staff were provided copies of a variety of flyers to post at program sites and in individual offices as well as within bathrooms. Educational signs included information on handwashing, proper covering of coughs/sneezes, using hand sanitizer, and social distancing practices of standing 6 feet or more apart from others.

Additional cleaning measures were instituted in each program site, with a cleaning list focusing on "high-touch surfaces" like light switches and door knobs. Various staff were assigned to participate in these activities to ensure proper frequency.

Homefull also enacted work from home measures when appropriate and possible, especially in state of Ohio programs as the Ohio Governor issued a Stay At Home order in mid-March of 2020. These work from home measures included additional technology equipment and support as well as shifting most client contact to phone or text versus in person. Specific programs established regular visits by a set of rotating staff members to assist with safety and security as well as to contact clients who were not reachable via phone.

The procedure for any staff member reporting to a program site, office, delivering food supplies in the community, or any other onsite work outside the home are required to report their temperature prior to reporting to work. Any staff exhibiting symptoms similar to COVID-19 are to report those immediately to Homefull administration for monitoring and possible quarantine as needed.

Specific plans related to Homefull's phases of operations (ie Phase 1 as most restrictive and Phase 2 as operating with some in-person interactions but with safety precautions in place) in response to COVID19 are included in the Appendix for reference.

PROGRAM ADMINISTRATION
Mandatory COVID-19 Vaccination Policy
(COA: ASE5, ASE6, ASE7)

Policy:
Since Homefull implemented a COVID-19 Response Plan in March 2020, Homefull has been dedicated to ensuring the protection of all staff and clients in response to the COVID-19 Pandemic. In response to the continued threat of COVID-19, further measures are needed to ensure the safety and well-being of Homefull staff and clients.

Due to the importance of maintaining staff and client safety, Homefull will be requiring all Homefull employees, on-site third-party contract workers, interns, and volunteers to be vaccinated against COVID-19, subject to the reasonable accommodation provisions of Title VII, the ADA, the Ohio Civil Rights Act, and in accordance with EEOC guidance. Employees who are vaccinated must provide verification of their vaccination status.

Homefull will also mandate all employees, on-site third-party contract workers, interns, and volunteers obtain COVID-19 booster shot(s) if 1) the CDC recommends all adults to obtain a booster shot; 2) the employee, on-site third-party contract worker, intern, or volunteer is eligible for a booster shot; and 3) the booster shot is readily available.

Employees who are not vaccinated against COVID-19 or who do not obtain COVID-19 booster shot(s) may request a reasonable accommodation to avoid receiving the COVID-19 vaccine or booster shot(s) if they have not been vaccinated as a direct result of:

1) an established disability or medical condition, OR
2) a sincerely held religious belief, practice, or observance may request a reasonable accommodation to avoid receiving the COVID-19 vaccine.

Homefull reserves the right to deny reasonable accommodation requests for COVID-19 vaccination exemptions if approval of such requests would pose an undue hardship or pose a direct threat to staff or clients.

Procedure:
Effectiveness: This policy will become effective October 1, 2021. All new hires after this date will be required to provide proof of vaccination from a qualified medical professional as a condition of employment. Proof of vaccination from a qualified medical professional for all current employees must be provided by October 31, 2021. Failure to take reasonable steps to obtain the COVID-19 vaccination or a reasonable accommodation by October 31, 2021, will result in appropriate corrective action, up to and including immediate termination of employment without additional warning.

Homefull will inform third-party contractors of this new policy and request third-party contractors confirm of all contract workers who work on-site in Homefull programming have been fully

vaccinated for COVID-19 within 60 days of the effective date. At the end of this 60 days, Homefull will not allow contract workers on-site without confirmation of COVID-19 immunization.

If the CDC recommends all adults receive COVID-19 booster shot(s), Homefull will require employees, on-site third-party contract workers, interns, and volunteers to obtain booster shot(s) as they become eligible as long as COVID-19 booster shot(s) are readily available to the public. Homefull will give employees, on-site third-party contract workers, interns, and volunteers a reasonable amount of time to obtain a COVID-19 booster shot(s). Factors that will determine reasonableness include, but are not limited to, the timeframe recommended by the CDC and the ready availability of booster shots.

Applicants and employees can be referred to www.gettheshot.coronavirus.ohio.gov for information on getting a COVID-19 vaccine and/or booster shot(s). Employees can utilize work time to obtain a vaccine or booster shot(s).

Employees who are seeking a reasonable accommodation for an exemption from immunization against COVID-19 or from obtaining COVID-19 booster shot(s) should contact HR for further guidance.

For employees who are unable to be vaccinated against COVID-19 or unable to obtain COVID-19 booster shot(s) due to an established disability or medical condition:

- Proof through a doctor's note, prescription, health insurance record must be provided OR completion by employee & employee's medical provider of the Request Form Medical Exemption Covid Vaccine.
- "Any disability or medical condition" includes pregnancy and any condition or impairment recognized under the ADA or Ohio Civil Rights Act definitions of "disability." *See* 42 U.S.C. 12102, O.R.C. 4112.01(A)(13).

For employees who are unable to be vaccinated against COVID-19 or unable to obtain COVID-19 booster shot(s) due to a sincerely held religious belief, practice, or observance:

> Provide a statement requesting exemption from the COVID-19 vaccination requirement. COVID-19, such as the Request Form Religious Exemption Covid Vaccine.

PROGRAM ADMINISTRATION
Health and Safety/Coronavirus – HUD Waiver for Inspections
(COA: ASE6, RPM1)

***Policy*:**
HUD allows for a waiver for a 6 month period beginning April 2020 for in-person inspections for programs providing rental assistance and leasing (requirement in 24 CFR 578.75(b)(1))

Procedure:
Pursuance to HUD's guidance and the waiver request submitted by Homefull, beginning in early April 2020, physical inspections will not be conducted by Homefull staff when able to inspect visually via technology (video conference, video calls, etc.). If a partner landlord is able to complete a video inspection with a Homefull staff member, this practice will proceed. If the partner landlord is unable to conduct this type of inspection, Homefull staff will arrange to conduct an in-person inspection alone only in vacant units based on the landlord's cooperation.

In the event that a visual inspection via video technology is completed, Homefull staff will physically inspect the unit within a 3-month period following when local health official release COVID-19 restrictions involving social distancing and Stay At Home orders.

Homefull program staff will track a list of properties that received a visual video inspection in order to complete the physical in-person follow up inspection in a timely fashion. Homefull staff will maintain records of all types of inspections as needed for verification.

PROGRAM ADMINISTRATION
Property Management
(CSB: F9, GOV7, H1, H2; CSB: A2, H3)

Policy:
Effective August of 2014, Homefull began property management functions. As the property management function evolved and expanded, a property management manual was developed. It is the policy of Homefull for the Property Management team to follow this manual and all policies contained therein. The Property Management manual will be maintained onsite at each program for which Homefull fills this role and will be included as an appendix item to the main Policies & Procedures Manual for the organization.

Procedure:
Homefull began a property management role with the acquisition of the Family Living Center in 2014 and expanded this role in 2019 with the addition of the Columbus division programs.. This property management role includes monitoring of properties, signing and overseeing leases, and ensuring safety issues are addressed, among other responsibilities. A full Property Management manual outlines details about leases, property rules, handling maintenance, and more. It is included as an appendix to the full agency Policies & Procedures Manual. The Property Management Manual will include, at a minimum, the following:

- Details on reasonable accommodations
- Conflict of interest policy
- Safety and security outline
- Procedures for tenant file maintenance
- Screening and application process
- Lease enforcement process
- Rent collection process
- Eviction process
- Facility operation including guests, parking, incidents, and maintenance

Additionally, all tenants will receive a copy of HUD's Resident Rights and Responsibilities handbook at the time of lease signing as well as legal information on lead-based paint laws.

When responsible for calculating tenant portion of rent, Homefull will follow standard guidelines for rent calculation, ensuring that the tenant portion of rent plus utilities does not exceed 30% of the tenant's income. Income and rent will be re-assessed annually at the time of recertification and records will be maintained in property management files along with verification of income.

More details on property management roles and rules are in the Property Management Manual included in the Appendix.

PROGRAM ADMINISTRATION
Property Management – Tenant Files

Policy:
As part of property management functions, Homefull will maintain tenant records that are up to date and complete. These files will be reviewed by Performance Improvement staff.

Procedure:
Homefull began a property management role with the acquisition of the Family Living Center in 2014 and has expanded this function through programs in the Columbus Division. This property management role includes monitoring of properties, signing and overseeing leases, and ensuring safety issues are addressed, among other responsibilities. As such, records of tenants are maintained separately than records of clients for the program services side of Homefull's work. These tenant files will be created and maintained by the Property Manager, overseen by the QA/PQI department.

Tenant files will include a table of contents, approved by the CEO. At a minimum files should include signed lease and addendums, verification of renters insurance if required, and confirmation of vehicle ownership for presence on property.

Files will be created upon lease signing and new files will be provided to the QA/PQI department within 5 days of lease signing. Table of Contents will be initialed by reviewed to signal that review was completed and items were present as required. Reviewed files will be returned to property management staff within 3 days of submission.

Files will be reviewed annually at time of re-certification.

PROGRAM ADMINISTRATION

Recruiting and Retaining Landlords
(COA: HSCL5)

Policy:

Homefull engages in multiple types of Rapid Rehousing programs that seek to end homeless episodes quickly, efficiently, and successfully. As a Rapid Rehousing practitioner, Homefull requires the development and retention of quality landlords throughout its service areas. It is the policy of Homefull to complete all government required paperwork to screen potential landlords, to work with landlords on meeting requirements, and to conduct appropriate inspections on all rental properties prior to signing leases and approving units for Rapid Rehousing funds. Further, Homefull will make every effort to pay landlords on time and correctly in order to retain their units for clients.

Procedure:

As a provider of Rapid Rehousing programs, Homefull has engaged Case Management and Supervisory staff in trainings from HUD and trainings conducted by internal staff on the philosophies and mechanics of Rapid Rehousing. Vital to this work is Homefull's relationship with landlords. HUD guidelines/suggestions for landlord engagement and recruitment has been used and resources lists are made available to HSCL supervisory staff. One resource used for developing this area is "*Rapid Re-Housing for Homeless Populations: Program and Community Strategies for Recruiting Private-Market Landlords and Overcoming Housing Barriers*" produced by The National Institute for Innovative Strategies to Combat Family Homelessness & Poverty.

The HSCL Program Manager is the key point person for landlords in the community. He/She will oversee the inspection process, approve paperwork for assistance applications, and approve all rental assistance vouchers. The CFO will issue checks payable to landlords based on information on rental assistance vouchers. The on time and consistent payment of landlords is key to retaining their partnership. This occurs by each person in the process completing their part on time.

HSCL Case Managers work with clients to meet other lease obligations and will be a liaison with the landlord on the client's behalf should issues arise. If needed, the HSCL Case Manager will engage the HSCL Program Manager to advocate for clients to landlords.

To assist with developing an ongoing pool of new landlords, an assigned staff member will serve as a Housing Specialist. This person will conduct outreach calls and respond to rental ads in order to introduce new landlords to Homefull and to Rapid Rehousing. Information about requirements for landlord/property participation is shared.

Annually, Homefull invites landlord representatives to the Stakeholder meetings each November to hear a presentation about outcomes and organizational goals. Landlords are key community partners so their presence at this meeting serves to further that relationship.

PROGRAM ADMINISTRATION
Grocery Store Operations

Policy:
As of Fall 2024, Homefull will operate a grocery store as part of the mantra of addressing housing, food, and jobs in the communities we serve. The Gettysburg Grocery Store Operations Manual will be an appendix to this full Policy & Procedures Manual. All employees of the Homefull Gettysburg Grocery will be subject to the employee policies, code of conduct, and benefits policies as described within.

Procedure:
Homefull's Gettysburg Grocery, opened in the Fall of 2024, will be part of the Homefull family of programs as part of our business line of operations. As a part of Homefull's mission to end homelessness, the Gettysburg Grocery will seek to provide job opportunities to Daytonians in underserved neighborhoods with an emphasis on West Dayton where the grocery store is located and will actively recruit clients in Homefull programs to further assist with stabilizing their housing. Homefull will continually seek to provide a living wage to all employees and will at all times be an equal opportunity employer.

This role of grocery operations demanded a full manual of operations, safety policies, hiring of minors, and other policies and procedures that are not addressed elsewhere in Homefull's primary Policy & Procedures Manual.

The Gettysburg Grocery Operations Manual will include, at a minimum, the following:

- Outline of grocery store positions and responsibilities
- Specific labor laws regarding hiring minors
- Code of conduct for employees including dress code
- Safety and security outline
- Facility operation including guests, parking, incidents, and maintenance

QUALITY IMPROVEMENT

Policy Statement
(COA: GOV6, HR2, HR4, HR7, PQI1, PQI3, PQI5, PQI6, CSB: E1,, M8)

Policy:
Homefull uses an active program planning process, which includes the writing of a comprehensive strategic plan that incorporates the following:

- Program evaluation
- Fiscal information
- Issues of productivity and service activity levels
- Quality improvement trends and patterns
- Human resources/personnel planning

The purpose of the Performance & Quality Improvement/Quality Assurance Plan is to continually seek improvements in the organization and in service delivery to consumers through the collection and use of data to manage and improve service delivery by identifying key strategic issues. The Quality Assurance Plan also promotes locating gaps in service delivery, identifying trends and patterns in both clinical and administrative operations, and the analysis and subsequent resolution of issues that are barriers to quality care and organizational viability.

Procedure:
The Quality Assurance Plan is drafted by the CEO and her designees. Homefull's Board of Trustees shall have the opportunity to review and provide input into the Quality Assurance Plan on a quarterly basis and are responsible for approving the plan. Copies will be made available at request. The current QA Plan is included in the Appendix.

Although the CEO is ultimately responsible for both the implementation of the plan and any follow-up reports/summaries of the Plan's activities, all Homefull staff are empowered and required to participate and carry out the plan. Elements of the QA Plan are woven into employee performance evaluations to demonstrate how each staff member's performance is directly related to the overall organization's performance. All new staff receive training in Homefull's philosophy of and approach to performance and Quality Assurance.

The Quality Assurance Plan will be carried out through the following activities:

1. Data will be collected that provide information on the needs of persons served, the needs of other stakeholders, and the business needs of the organization. The collection of such data will allow for analysis by the Homefull Management Team. The COO will be responsible for demonstrating that data is collected in such a manner as to preserve reliability, validity, completeness, and accuracy. Quality Assurance staff will monitor data input, timeliness, accuracy, and calculate outcomes for review.

2. The Homefull Management Team facilitates discussion with agency staff, referral sources, Board of Trustees, and consumers to develop an Annual Quality Assurance Plan at the

beginning of each fiscal year. The Plan is monitored by the Homefull Management Team for continual progress or barriers preventing progress during the fiscal year. The Plan includes the performance goals and indicators for the organization. The Plan is developed from the analysis of the following reports:

- Financial
- Surveys
- Governance
- Human Resources (to include employees, volunteers, interns, contractors)
- Technology Analysis
- Health and Safety

3. The data collection system not only includes the characteristics of the persons served, but also collects data on the consumers at the beginning of services, appropriate intervals, at the end of service, and post-discharge. The data collection system includes indicators on the effectiveness of services, the efficiency of services, service access, and satisfaction feedback from persons served and other stakeholders, such as the family and referral sources.
4. Effectiveness of the Homefull Program will be measured by analyzing the consumer changes over time.
5. Monitoring and analyzing data in the electronic client record system (HMIS) and ensuring a high standard of quality and completion.

Specific effectiveness measures could include:

1. Residential Stability
2. Benefits
3. Employment
4. Income
5. Independence
6. Consumer Satisfaction
7. Data Collection (HMIS)
8. Case Planning
9. Productivity

Homefull will convene a Quality Assurance (QA) Committee to meet regularly and review areas identified in the plan. The COO will ensure that a performance analysis is completed on a regular basis for both business purposes and service delivery. The analysis will include a selected sampling of the above measures of effectiveness, efficiency, service access, and consumer/stakeholder satisfaction. The analysis will include areas needing an action plan to address the improvements needed, and actions taken/changes made to improve performance.

The analysis will be used by the Homefull Management Team and Board of Trustees to monitor adherence to Homefull's Mission and Core Values of the organization; improve the quality of program services; and facilitate organizational decision making and strategic planning. These reports will be shared with agency staff, the Board of Trustees, and made available to consumers and other stakeholders.

QUALITY IMPROVEMENT
Consumer Input
(COA: PQI1, PQI4, PQI5, HSCL7; CSB: E9)

Policy:
Consumer satisfaction surveys will be conducted 2 times per year for each Homefull Program.

Procedure:
All consumers receiving services will be provided a satisfaction survey and will be asked to complete the form. In order to maintain anonymity, consumers will be directed not to put their names or any other identifying information on the form. They will be provided with a post-paid envelope in which to return the completed survey.

The Program Director will develop a brief report of the findings.
Surveys will ask the consumers to provide input into the following areas:

1. timeliness of appointments
2. helpfulness of services
3. staff respect of cultural background
4. treatment planning and goal setting
5. overall satisfaction with Homefull
6. willingness to recommend services to others

When response rates are low, attempts will be made to contact consumers to tell them about the survey and its importance and to request that consumers complete the survey. New surveys will be sent to those consumers agreeing to participate. Telephone interviews can also be offered to those consumers unable to complete a paper/pencil survey. A focus group may also be conducted as a means of collecting satisfaction data.

Findings will be reviewed quarterly and suggestions for improvement will be discussed by the Management Team and Board of Trustees. Findings will also be included in the program's quarterly report to the Board of Trustees. The Board of Trustees, Management Team, and/or the Program Director can facilitate programmatic changes in response to the survey results. All discussions regarding survey results and/or changes made to Homefull programming as a result of survey responses will be documented as such in Management Team minutes, Board of Trustees meeting minutes, and/or Homefull quarterly Quality Assurance Plan report.

QUALITY IMPROVEMENT
Confidentiality
(COA: PQI3, CR2; CSB: A12)

Policy:
As with all aspects of the program, Homefull will ensure the confidentiality of all consumers and staff during Quality Assurance Plan review activities.

Procedure:
Clinical records selected for review are seen only by designated, qualified staff members. All staff members have signed a confidentiality statement as a condition of their employment. Information obtained from the records during the process is used only for review purposes.

QUALITY IMPROVEMENT
Conflict of Interest
(COA: GOV7, PQI5; CSB: A2)

Policy:
Efforts are made to ensure that conflicts of interest do not occur during Quality Assurance Plan activities.

Procedure:
In order to minimize conflict of interests, no clinician reviews his/her own clinical records. Additionally, no clinician shall review any records of relatives.

QUALITY IMPROVEMENT
Documentation of Quality Improvement Plan Activities
(COA: PQI5; CSB: M7)

Policy:
All Quality Improvement/Assurance Plan activities will be documented and the documentation will be maintained.

Procedure:
All staff involved in Quality Assurance Plan activities will use designated forms for collecting and documenting data. Quarterly reports are completed for the CEO. Quality Assurance Plan reports include a description of the purpose, frequency, methodology, results, and conclusions/analysis of reviews as well as recommendations for corrective action and how reviews are communicated to staff, persons served, stakeholders, and the Board of Trustees. QA staff report any findings to the CEO.

QUALITY IMPROVEMENT
Reporting and Analyzing Outcomes
(COA: PQI5)

Policy:
Homefull engages in a robust quality improvement effort with the goal of maintaining high quality services and exceeding outcomes for the overall improvement of client lives.

Procedure:
Homefull conducts regular reviews of outcome data at the program level and at the agency level. Program Managers and Directors are trained on analyzing their program's data and on how to check for error and missing information in order to regularly ensure data completeness. Each Manager/Director responsible for a program area is required to complete a quarterly program report that includes program outcomes and evaluates individual staff performance.

Quality Assurance staff evaluate data reports in HMIS regularly both as a general quality assurance practice but also for regular reporting to oversight bodies as required. Each monitoring/audit provides an opportunity to further evaluate program outcomes and ensure data is entered correctly with minimum to no errors. Each direct HUD grant requires annual upload of Annual Performance Report data directly from HMIS.

Annually the QA Committee determines if any changes are needed to the agency outcomes being tracked for reporting on the Agency Report Card. Annual Agency Report Card outcomes are presented to stakeholders.

QUALITY IMPROVEMENT
Client Chart Review/Team and Process
(COA: PQI4, PRG1)

Policy:
Homefull shall maintain procedures for regularly conducting review of client records to ensure all regulations are being met and a high quality of care is being provided. Homefull's record review process shall utilize a tool that is consistent with oversight body requirements to ensure a high standard of practice.

Procedure:
As a function of the QA Committee, a Chart Review and Compliance Team will regularly review client records via the electronic system appropriate for the service area (primarily HMIS). All client records are held in this electronic system, allowing access for all supervisors and the Chart Review Team to conduct reviews at any time.

The Chart Review tool is evaluated regularly to ensure that it remains consistent with all requirements for accreditation, certification, local oversight bodies, and specific grants.

Each calendar quarter, a minimum of 10% of each service program are reviewed by the Chart Review and Compliance Team. Chart Review forms are completed, signed electronically by the reviewer, and then sent to the assigned Case Manager and supervisor to make corrections as needed. Case Managers are instructed to sign the Chart Reviews once corrections are completed and return them back to the reviewer.

HMIS best practices sessions will be held for each service area (e.g. Dayton and Columbus) to review common trends seen on the Chart Reviews and increase the competency for all Case Managers to correctly use the electronic health record system.

CLIENT RIGHTS, GRIEVANCES, & RECORDS

Policy on Ethical Conduct
(COA: CR1; RPM1; CSB: F1, F4)

Policy:
All services offered by staff of Homefull will be done so in accordance with the ethical standards of each professional's credentialing or licensing body. All Homefull staff are expected to follow the organization's commitment to confidentiality and general code of conduct, regardless of professional affiliation. All business practices and marketing efforts will be in compliance with the standards outlined in Homefull Corporate Compliance Plan. Each professional staff person will be familiar with and bound by their individual professional code of ethics.

Procedure:
At the client's first contact, Homefull staff provide a written summary of their rights and responsibilities that includes but is not limited to:

1. description of the client's rights, including the obligations the organization has to the client;
2. basic expectations for use of the Homefull's services;
3. hours that services are available;
4. rules, expectations, and other factors that can result in discharge or termination of services;
5. clear explanation of how to lodge complaints, grievances, or appeals.

This is provided in the form of the Homefull Consumer Handbook. A copy is included in the Appendix.

If a consumer, family, community agency or Homefull employee believes that there has been a violation of any professional code of ethical conduct, he/she should notify the Homefull CEO, Tina Patterson. In the event the complaint involves the CEO, the Board of Trustees, should be notified. The complaint will be reviewed and discussed with the individual involved, with follow-up action as necessary. This action may include discussion of appropriate behavior, documentation of concerns in writing, and/or written reprimand placed in employee's file. More serious action may be taken depending on the offense. When appropriate, an individual's credentialing agency may be contacted for action.

Homefull does not serve unaccompanied minors per policy on target population.

CLIENT RIGHTS, GRIEVANCES, & RECORDS
Non-Discrimination in Admission or Services
(COA: RPM1, CR1, CSB: A4, F2)

Policy:
Admission to and services of Homefull are extended to all eligible consumers without regard to race, ethnicity, color, religion, creed, sex, gender, gender identity/expression, sexual orientation, political affiliation, union activity, disability (including physical or mental handicap or developmental disability), national origin, ancestry, age, inability to pay for services, lifestyle, familial status, HIV/AIDS status, military status, or any other class protected by federal, state, or local law. Homefull prohibits denying admission or terminating assistance based on a client being a victim or survivor of domestic violence, sexual assault, or stalking. Homefull also does not discriminate against anyone based on union activity or political affiliation.

Procedure:
The program's documentation includes a written consumer's rights statement that explicitly states that Homefull practices non-discrimination in admission and the provision of services.

CLIENT RIGHTS, GRIEVANCES, & RECORDS
Fair Housing and Equal Opportunity Housing (FHEO)
(COA: RPM1, CR1, CSB: E10, H7, H8)



Policy:
Homefull prohibits discrimination in the provisions of services to clients including housing programs. Homefull adheres to all local, state, and federal practices for equal housing opportunities.

Procedure:
Homefull's housing assistance programs do not discriminate based on race, ethnicity, color, religion, creed, sex, gender, gender identity/expression, sexual orientation, political affiliation, union activity, disability (including physical or mental handicap or developmental disability), national origin, ancestry, age, inability to pay for services, lifestyle, familial status, HIV/AIDS status, military status, or any other class protected by federal, state, or local law. We ensure all citizens have equal access to information about the program and have equal access to the financial assistance and services provided under this program.

Homefull's documentation includes a written consumer's rights statement that explicitly states that Homefull practices non-discrimination in admission and the provision of all services. This can be found in the Consumer Handbook.

If needed due to unit maintenance or natural disaster, a client can be relocated temporarily if they can be offered a decent, safe and sanitary unit in the same building or complex upon project completion or a comparable unit in the same geographic area. Homefull will maintain records on any displaced clients. Any clients permanently displaced will also receive information on the Fair Housing Act.

CLIENT RIGHTS, GRIEVANCES, & RECORDS

Designation of Client Rights Officer

(COA: CR1; CSB: F1, F3)

Policy:

A designee of Homefull's Chief Operating Officer (COO) serves as the Client Rights Officer (CRO) whose responsibility it is to accept and oversee the process of any complaint or grievance filed by a consumer or other person or agency on behalf of a consumer and to assure that client rights are not being violated. The Client Rights Officer assures that Homefull staff will explain any and all aspects of Homefull Client Rights and the grievance procedure upon request.

Procedure:

The Chief Operating Officer (COO) and CEO will designate a Client Rights Officer to handle all inquiries about client rights and grievances. The CRO will present complaints to the grievance review committee for assessment and determination if a right was violated. The Committee will present all grievances to the CEO for final determination of response.

The Client Rights Officer is located at:

Homefull
807 S. Gettysburg Ave. Suite 201
Dayton, Ohio 45417

Phone: 937-293-1945

Hours: 9:00 am to 5:00 pm Monday through Friday

CLIENT RIGHTS, GRIEVANCES, & RECORDS

Client Rights Statement

(COA: CR1, CR3, HSCL7; CSB: F1, F3, F7, F9, H6, M8, M9)

Policy:

Homefull has a Client Rights Statement that is posted for consumers to view at any time during their participation in our programs. This statement is also reviewed with each staff member during initial orientation to Homefull. The program also strives to assure consumers' understanding of their rights and how to exercise their rights.

Procedures:

Homefull staff will post the Client Rights Statement at each program site.

All Homefull consumers have the following rights:

1. **The right to be treated with consideration and respect** for personal dignity, autonomy and privacy.
2. **The right to service in a humane setting** which is the least restrictive feasible as defined in the case plan.
3. **The right to be informed** of one's own condition, of proposed or current services, treatment.
4. **The right to consent to or refuse** any service, treatment, upon full explanation of the expected consequences of such consent or refusal. A parent or legal guardian may consent to or refuse any service, treatment or therapy on behalf of a minor client.
5. **The right to a current, written, individualized case plan** that addresses one's own needs and that specifies the provision of appropriate and adequate services, as available, either directly or by referral.
6. **The right to active and informed participation** in the establishment, periodic review, and reassessment of the case plan.
7. **The right to freedom** from unnecessary or excessive medication.
8. **The right to freedom** from unnecessary restraint or seclusion.
9. **The right to participate** in any appropriate and available agency service, regardless of refusal of one or more other services, programs or case plans, unless there is a valid and specific necessity which precludes and/or requires the client's participation in other services, this necessity shall be explained to the client and written in the client's current case plan.
10. **The right to be informed of and refuse** any unusual or hazardous treatment procedures.
11. **The right to be advised of and refuse** observation by techniques such as one-way vision mirrors, tape recorders, televisions, movies or photographs.
12. **The right to have the opportunity to consult** with legal counsel, at one's own expense.
13. **The right to confidentiality** of communications and of all personally identifying information within the limitations and requirements for disclosure of various funding and/or certifying sources, state or federal statutes, unless release of information is specifically authorized by the client or parent or legal guardian of a minor client or court-appointed guardian of the person of an adult client in accordance with rule 5122:2-3-11 of the Administrative Code.
14. **The right to be informed in advance** of the reason(s) for discontinuance of service provision, and to be involved in planning for the consequences of that event.

15. **The right to receive an explanation** of the reasons for denial of service.
16. **The right to have access to one's own records**, unless access to particular identified items of information is specifically restricted as "not for consumer access" or when deemed to have the potential to cause severe emotional damage resulting in imminent danger to the client. This may be indicated the client's case plan or as deemed so by the COO or CEO. Requests to review records must be submitted in writing to the CEO.
17. **The right not to be discriminated against** in the provision of service on the basis of race, ethnicity, color, religion, creed, sex, gender, gender identity/expression, sexual orientation, political affiliation, union activity, disability (including physical or mental handicap or developmental disability), national origin, ancestry, age, inability to pay for services, lifestyle, familial status, HIV/AIDS status, military status, or any other class protected by federal, state, or local law.
18. **The right to know** the cost of services.
19. **The right to be fully informed** of all rights.
20. **The right to exercise any and all rights** without reprisal in any form including continued and uncompromised access to service.
21. **The right to file a grievance.**
22. **The right to have oral and written instructions** for filing a grievance.

CLIENT RIGHTS, GRIEVANCES, & RECORDS
Consumer Grievance Procedure
(COA: HSCL7, RPM2, CR1; CSB: F1, F3)

Policy:
This grievance procedure ensures that consumers of Homefull or their advocates are provided with a method to seek remediation for unsatisfactory services or failure by the staff to conform (either by act or omission) to standards of practice and behavior which the public has reasonable expectation to require of professionals in human service disciplines.

Consumers or their advocates who believe that a violation of Client Rights, as described in the document "Client Rights," can initiate a grievance. Situations resulting in the filing of a grievance may include individuals believing that they have not received services as promised; individuals believing that a member of the staff of Homefull has provided a service or treatment that has harmed or injured the consumer; or individuals who believe that a breach of professional standards by a member of Homefull has produced a deleterious consequence. Consumers or their advocates expressing a desire to file a grievance will be encouraged to do so as soon after the incident as they are comfortable in so doing; however, there is no time limitation for an individual to file a grievance.

Assistance is available in the following if needed and/or desired by the complainant: 1) filing a grievance, 2) investigating the grievance, and 3) agency representation at the agency hearing on the grievance. This assistance shall be available through Homefull's Client Rights Officer. Prompt access to the Client Rights Officer will be provided. The complainant also will have the opportunity to be heard by an impartial decision-maker.

Homefull will provide written acknowledgement of the grievance to each complainant within three working days from receipt of the grievance. Written resolution to the complaint/grievance will be completed within 21 days. If this resolution is unsatisfactory to the complainant, the complainant can request a hearing with the Grievance Review Committee. Any consumer who files a grievance shall be accorded due process.

Homefull will maintain records of grievances received for a period of at least two years. These records are available for review by funding and certifying entities upon request.

Procedure:

Grievance/Complaint

Consumers wishing to lodge a grievance/complaint may attempt to resolve the issue through their program's Program Manager or may contact the Client Rights Officer directly. If the resolution from the Program Manager is not satisfactory or the issue is regarding the Program Manager, the complainant may contact the Client Rights Officer.

Grievances must be in writing. Any consumer who wishes to file a grievance may do so and will be provided the Homefull Grievance Form, which must include the following information: 1) the name of the person filing the grievance; 2) the date, time, description and names of individuals involved in the incident/situation being grieved; 3) a description of the grievance, 3) the signature of the person filing the grievance and, 4) the date that it is signed. Any consumer who files a grievance shall be accorded due process.

The grievance form indicates that it should be submitted to the Client Rights Officer. The Client Rights Officer can be reached at the following: Homefull, 807 S. Gettysburg Ave., Suite 201, Dayton, Ohio 45417. Phone: 937-293-1945. Hours: 9:00 am to 5:00 pm Monday through Friday.

When a grievance has been received, the Client Rights Officer will have three working days in which to acknowledge receipt of the grievance to the person or persons making the complaint. The acknowledgement will be in writing and will include the following:

- Date the grievance was received.
- Summary of the grievance.
- Overview of the grievance investigation process.
- Time table for completion of the investigation and notification of the resolution.
- Treatment provider's contact name, address, and telephone number.

The consumer will also be informed that they have the option to file a grievance with outside organizations that include but are not limited to the following:

□ Ohio Department of Mental Health
30 e Broad Street
Columbus, Ohio 43266
(614)466-2596

□ Ohio Department of Alcohol and Drug Addiction Services
Two Nationwide Plaza - 12th Floor
280 North High Street
Columbus, OH, 43215
(614)644-8318

□ Ohio Legal Rights Services
8 East Long Street - 5th Floor
Columbus, OH 43215
(800) 282-9181

□ U. S. Department of Health and Human Services, Office of Civil Rights
105 West Adams Street
Chicago, IL 60603
(312)886-2359

The Client Rights Officer will make a resolution decision on the grievance within 21 calendar days of receipt of the grievance. The decision will include 1) a brief statement of reasons for the decision; 2) a statement that, if the complainant does not agree with the decision, the complainant may request a hearing, and 3) the deadline to submit the request. This resolution will be a written and will be explained verbally to the consumer as well. If there are extenuating circumstances as to why a decision cannot be rendered within the 21 days, the need for an extension will be documented

in the file and written notification presented to the consumer.

In cases where the grievance is against the Client Rights Officer, the Chief Operating Officer will accept the grievance and will provide assistance as needed. The grievance will be submitted to the COO between the hours of 9am and 5pm at the address provided above.

The Client Rights Officer has the authority to take all necessary steps in order to assure compliance with the grievance procedure. All staff of Homefull will have a comprehensive understanding of the grievance procedure and will inform consumers who are expressing concerns about the availability of the Client Rights Officer and about their right to file a grievance.

Hearing

If the complainant is not satisfied with the determination made by the Client Rights Officer, the complainant may pursue a hearing with the Grievance Review Committee by submitting a hearing request within ten business days after receiving the summary of the informal conference. Upon receipt of the written request for a hearing, the Client Rights Officer will schedule a hearing within 21 days from date of complainant's request and notify complainant 10 days in advance of the hearing date.

The complainant has an unqualified right to be represented by counsel or any other person chosen as a representative and to have the representative make statements on the complainant's behalf. Prior to the hearing, the complainant has the opportunity to see and obtain evidence relied upon to make the decision and any other documents in the complainant's file prior to the hearing, including a written notice to the client containing a clear statement of the reasons for the decision.

At the hearing, the complainant will have the right to present written or oral objections to the decision, and present proofs and arguments, including questioning all witnesses and introducing exhibits such as leases, notices, and other documents. The complainant has the burden to prove they are entitled to the relief sought. Homefull has the burden of justifying its action or inaction. The hearing will be private and before the impartial and disinterested Grievance Review Committee. Neither any person who participated in the Homefull decision being challenged, or any subordinate of such a person, will serve on the Committee, nor will any person related to the complainant or the Homefull decision-maker.

Reasonable accommodations for persons with disabilities will be made upon request to ensure

participation in the hearing. If a consumer is of limited English proficiency, Homefull will take affirmative steps to ensure the consumer has meaningful access to the grievance procedure, such as providing an appropriate interpreter for both the informal conference and grievance hearing, and translating all vital documents, including notices, forms, summaries, and decisions, into the consumer's primary language.

Within 10 business days after the hearing, the Grievance Review Committee will prepare a written decision and send this decision to both parties. The decision will contain the reason(s) supporting the Grievance Review Committee's determination.

Maintaining Records of Grievances

The Client Rights Officer will maintain a file of written consumer grievances. This will include a copy of the grievance, documentation of the grievance resolution, documentation if applicable of extenuating circumstances for extending the time period for resolving the grievance beyond 21 calendar days, and a copy of the letter to the grievant reflecting the resolution.

A quarterly summary of grievances received by Homefull will be compiled and analyzed for trends, areas needing improvement, and actions to be taken. These summaries will be included in a report to be reviewed and approved by Homefull's QA Committee. This report will also include the number of grievances received, the nature of the grievances, and the resolution status of the grievances. This report will also be shared with consumers during annual stakeholder meetings so that consumers are involved in monitoring summary information and trends related to grievances as part of Homefull's quality assurance practices.

CLIENT RIGHTS, GRIEVANCES, & RECORDS

Consumer Copy of Rights and Grievance Procedure

(COA: CR1, HSCL7; CSB: F1, F3)

Policy:

Consumers of Homefull are informed of the consumers' rights statement and a copy of the grievance procedure during the initial meeting with Homefull staff. The presentation of these materials will include a verbal explanation of Client Rights and explanation of the grievance procedure.

Procedure:

Descriptions of Client Rights and grievance procedures are presented using methods attuned to consumer's comprehension. A copy of the Homefull Consumer Handbook is provided and if needed is read to the client. The Handbook is included in the Appendix.

CLIENT RIGHTS, GRIEVANCES, & RECORDS

Staff Copy of Client Rights and Grievance Procedure

(COA: CR1, HSCL7; CSB: F1, F3)

Policy:

All Homefull staff, including administrative and support staff, will be familiar with all specific Client Rights and the grievance procedure.

Procedure:

During staff orientation, each new staff member will become familiar with the Client Rights and the consumer grievance procedure. Staff members will receive copies of each document and will sign a statement indicating an understanding of these documents and an agreement to abide by them.

All staff also receive and review the Consumer Handbook prior to providing it to clients.

CLIENT RIGHTS, GRIEVANCES, & RECORDS
Display of Rights Statement and Grievance Procedure
(COA: CR1, HSCL7; CSB: F1, F3)

Policy:
Homefull attempts to develop, augment, and confirm the efforts of consumers to increase their extent of personal responsibility and foster independence and self-determination. Consumers of Homefull are therefore not only encouraged to become aware of their rights but also are involved in resolving problems in all aspects of their lives.

Knowledge of legal and ethical rights afforded to consumers will improve the decision making process of the individual. Conflicts with the services of the program can present an appropriate opportunity to use problem-solving skills.

Procedure:
A copy of the Consumers' Rights Statement and a copy of the grievance procedure are both prominently displayed at each Homefull program site and are available at all times for review and clarification.

A copy of the grievance form is included in the Appendix.

CLIENT RIGHTS, GRIEVANCES, & RECORDS

Consumer Records/Confidentiality

(COA: RPM5, CR2, PRG1, PRG2; CSB: M1, M2, M3, M7, M9)

Policy:

Homefull conforms to the standards for maintaining confidence of records and other information as required by applicable federal and state laws, the professional requirements of the various disciplines represented by the staff of Homefull. Homefull will ensure that appropriate safeguards are applied to protect the records of persons served and confidential administrative records. Homefull staff follow all policy and protocol for use of HMIS, the web-based client record system (Homeless Management Information System) for all Divisions in which HMIS or similar client database system is used. After 2013, all Homefull client records are fully electronic and maintained in HMIS. Homefull will provide consumers with all appropriate HIPAA explanations and acknowledgements and follow HIPAA guidelines. All Homefull staff utilizing HMIS or other client database will post the appropriate privacy policy in a visible location.

Procedure:

Confidentiality of consumer records maintained by this program is protected by federal law and regulations. Generally, the program will not convey to a person outside the program that a consumer attends or receives services from the program or disclose any information identifying a consumer, unless:

- the consumer consents in writing;
- the disclosure is allowed by a court order;
- the disclosure is made to medical personnel in a medical emergency, or,
- the disclosure is made to qualified personnel for research, audit, or program evaluation.

In the event that a consumer or their guardian allows Homefull to share their photo/video image and/or details regarding their experience, and other personal information, a Media Release will be obtained prior to dissemination of information. The signed Media Release will be maintained in the client's record. A copy of the Media Release is in the Appendix for reference.

Homefull will ensure that all current and historical records are safeguarded against unauthorized disclosure through the following means:

- The organization of records in a systematic fashion
- The designation of one or more staff members with responsibility for controlling the records and implementing policies and procedures pertaining to the records
- Only authorized personnel will have access to records of the persons served, administrative records, and electronically generated documents.
- Confidential information will be protected by securing all records and reasonably protecting them against fire, water damage, and other hazards.
- A routine process for the retention and destruction of records that is implemented for both paper and electronic records, but includes provision for the destruction of records in the event that a legal process is initiated against the organization.

- Compliance with all applicable state, federal, and provincial laws.
- Only data related to homelessness and services received by Homefull are included in client records.

If needed, any former consumer records maintained are kept in a file cabinet that can be locked in a secured area. Consumer records are not removed from the office. Professionals from outside agencies have access only when signed consent is obtained from the involved consumer and only for information as specified on the release of information. Any information released contains the Federal Confidentiality prohibition of re-disclosure statement. Violation of the federal law and regulations by a program is a crime. Suspected violations may be reported to appropriate authorities in accordance with Federal Regulations.

Program staff will not convey to anyone outside of the program that a consumer attends or receives services from Homefull. No information will be disclosed that identifies a consumer as an alcohol or drug services consumer unless the consumer consents in writing for the release of information, the disclosure is allowed by a court order, or the disclosure is to a qualified person for a medical emergency, research, audit, or program evaluation purpose. Information in HMIS or any version of Service Point is only shared with other organizations included in an HMIS agreement.

Federal laws and regulations do not protect any threat to commit a crime, any information about a crime committed by a consumer either at the program or against any person who works for the program. Federal laws and regulations do not protect any information about suspected child abuse or neglect from being reported under state law to appropriate state or local authorities.

Homefull includes a privacy statement on all emails, both internal and external, and on the agency website. Consumers will be notified of the confidentiality policy and limits thereof via the Consumer Handbook and verbal instruction at the first meeting with a Homefull staff member.

CLIENT RIGHTS, GRIEVANCES, & RECORDS
Consumer Records/Components and Deadlines
(COA: PRG1, RPM6, HSCL7; MHSU4; CSB: G1, G2, G3, G4, M2, M8, M9)

Policy:
Records of the consumers of Homefull contain only the types of data required for the purposes of program administration, program audits, and the attainment of the program's service plan, and as approved by the certification and regulatory entities that authorize the operation of the program, (i.e. the Board of Trustees). All staff accessing client records in the Homeless Management Information System (HMIS) will follow all HMIS rules and regulations. The policy manual for HMIS is included in this Policy and Procedure Manual in the Appendix.

Homefull maintains information that describes the populations served by the program, documentation that describes the types of services provided to consumers, and verification that services are provided within methods that are legally and professionally appropriate and acceptable.

It is the policy of Homefull to create and maintain records that, in addition to their primary intended purpose of clinical and client care use, will also serve the business and legal needs of Homefull. It is the policy of Homefull to maintain records such that their integrity will not be compromised and they will support the business and legal needs of Homefull.

Procedure:
All staff members are expected to use HMIS as the primary means to access and retrieve information, and capture data. In many cases, it is expected that this use will occur in close proximity to the client, such as to support positive client identification, accurate and complete data capture, and appropriate communication of information to the client. Any documents containing client information that need to be saved to a computer for uploading to the HMIS record should be deleted from the computer or any electronic storage device immediately after uploading to HMIS. Additionally, any hard copies of documents should be scanned and uploaded as an attachment, following standard Homefull naming conventions.

Client and staff signatures are made to the electronic documents via a signature pad. At no time should a Homefull staff member utilize a signature from a previously signed document to sign a new document on behalf of a client in absence of that client.

Consumer Records should communicate information in a manner that is organized, clear, complete, current, and legible. All documents generated by the organization which require signatures should include original signatures of the appropriate staff. Consumer Records should minimally contain:

- The date of admission
- Information about the consumers' personal representative, conservator, guardian, or representative payee, if any of these are applicable
- Information about the person to contact in the event of an emergency, including the

name, address, and telephone number
- The name of the person currently coordinating the services of the consumer
- Information about the consumer's primary care physician, including name, address, and telephone number.
- The consumer's:
    1. History
    2. Current Medications
    3. Documentation of Events
    4. Assessments
    5. Case Plans, including reviews
    6. Discharge Plan, when applicable
    7. Discharge Summary for all consumers who have left the organization's services
    8. Correspondence pertinent to the consumer
    9. Authorizations for Release of Information
    10. Documentation of referrals.

Documents Not Included in the Legal Health Record
Administrative data and documents should be provided the same level of confidentiality as the legal case record. However, administrative data should not be considered part of the legal case record and would not be produced in response to a subpoena for the record. Administrative data are patient-identifiable data used for administrative, regulatory, case management operation, and payment (financial) purposes. Examples of administrative data include:

•Abbreviation and do-not-use abbreviation lists
•Audit trails related to the client record
•Authorization forms for release of information
•Birth and death certificate worksheets
•Correspondence concerning requests for records
•Databases containing client information
•Event history and audit trails
•Financial and insurance forms
•Client-identifiable data reviewed for quality assurance
•Case notes and plans

Data and Documents to Be Considered Part of the Record:

•Advance directives
•Consent forms for care, treatment
•Consultation reports
•Discharge summaries
•Functional status assessments
•History and physical examination records
•Immunization records
•Client-submitted documentation
•Client education or teaching documents
•Client identifiers
•Photographs (digital and analog) (Media Release)

- Case notes and documentation
- Psychology and psychiatric assessments and summaries (excluding psychotherapy notes)
- Records received from another healthcare provider if they were relied on to provide healthcare to the client
- Any other information required by the Medicare Conditions of Participation, state provider licensure statutes or rules, or by any third-party payer as a condition of reimbursement

Encounters documented by staff members in the electronic record are expected to be completed and signed electronically at a maximum of 48 hrs after the encounter. Additional documentation related to that visit (i.e., assessment results or delayed documentation of referral information) will be added to the note as an addendum or attachment when this additional information is available. Additionally, policy demands a maximum of 48 hours from the receipt of any record to attachment into HMIS or placement into paper chart. No duplicate information or reports should be maintained outside of the main Consumer Record of the consumer.

Also at the time of intake, the consumer is notified of program rules and consumer expectations, consumer rights, consumer grievance procedures, and federal laws/ regulations regarding confidentiality of consumer records (42 CFR Part 2 and HIPAA) during the initial meeting.

The signed consent to release information is obtained during the initial meeting with the consumer. The disclosure of consumer information form contains the following: 1) name of program making the disclosure; 2) name or title of individual or name of the agency to which the disclosure is to be made; 3) name of the consumer; 4) purpose of the disclosure; 5) type and amount of information to be disclosed; 6) original signature of the consumer or the person authorized to give consent; 7) date that the appropriate person signed the consent; 8) statement that the consent is subject to revocation at any time except to the extent that the program or person who is to make the disclosure has already acted in reliance on it; and 9) the date, even, or condition upon which the consent will expire unless revoked prior to that time.

The consent for treatment is also obtained during the initial meeting with the consumer. An initial case plan is completed. The Case Plan contains at least the following information: problems to be addressed; goals; services to be provided; and signature and credentials of a Homefull staff meeting the requirements for being a case manager.

Homefull conforms to the standards for maintaining confidence of records and other information as required by applicable federal and state laws, the professional requirements of the various disciplines represented by the staff of Homefull. All disclosures must be accompanied by the following written statement:
“This information has been disclosed to you from records protected by Federal Confidentiality Rules (42 CFR Part 2). The Federal rules prohibit you from making any further disclosure of this information unless further disclosure is expressly permitted by the written consent of the person to whom it pertains or as otherwise permitted by 42 CFR Part 2. A general authorization

for the release of medical or other information is not sufficient of this purpose. The Federal rules restrict any use of information to criminally investigate or prosecute any alcohol or drug abuse consumer."

The assessment/intake highlights strengths and assets, as well as weaknesses and limitations and includes, at a minimum:

> Current living arrangements; presenting problem or precipitating factors leading to the need for assessment; past and present history of alcohol and other drug use; history of treatment for alcohol and other drug abuse; mental Status and mental health history; medical history to include allergies; employment history; educational history; legal history; Individual's strengths/assets; Individual's weaknesses/limitations; Recommended course of treatment.

All case records include case plan (detailed in the following policy) and multiple case notes reflecting the implementation and evaluation of case plans for each consumer. Case notes should be written with sufficient content as to justify the consumer's continuing need for services. The notes should indicate progress toward achieving the goals and objectives identified in the case plan and will indicate the outcomes stated in the case plans. Case notes will be written for each contact, including phone calls to service providers on behalf of a consumer, contacts with the consumer and his/her family, attendance at staffings or team meetings, etc. Case notes contain 1) the consumer name, 2) date of the contact, 3) length of time for the service delivery; 4) type of service provided; 5) a summary of what occurred during the service contact; and 6) the date, signature and credentials of a Homefull staff. Case notes must be completed within 48 hours of time of service. All case notes will be signed by the Case Manager of record; signature will include credentials and selection of name from Case Manager dropdown list in the HMIS record. Clinical Director or other compliance staff will review documents and ensure proper signing is completed.

Discharge planning will begin at the 1st case management appointment. Discharge goals will be documented within the case plan and updated every 30 days. Movement toward transition will be consistently discussed with consumers throughout their stay in Homefull programs to ensure their readiness to transition to discharge or alternative housing when this is most appropriate for the consumer. For all persons being discharged from service, an exit summary must be prepared in HMIS documenting the client's:

- reason for discharge
- destination
- housing status.

Homefull case notes and case plans will illustrate the client's:

- date of discharge from the program
- goals achieved during program participation
- progress in his/her own recovery or move toward well-being
- identification of the person's needs for support systems or other types of services that will assist in continuing his/her own recovery or well-being.

CLIENT RIGHTS, GRIEVANCES, & RECORDS

Consumer Records/Case Plans

(COA: HSCL4, MHSU4, RPM6; CSB: G1, G3)

Policy:

Case planning is an approach to providing service that identifies needs, sets goals and determines the priority actions that are to be taken by a client and the case manager. Case planning is a collaborative process between the individual and the case manager that includes assessment, planning, implementation and review. The purpose of case planning is to meet an individual's needs through communication and available resources. Case planning should be regularly reviewed and should capitalize on the client's strengths and formal/informal supports.

Procedure:

Case Plans are developed at the time of the first face to face contact between a consumer and Homefull staff member and is included in the consumer record. This case plan will be revised and updated as needed or until the consumer is discharged from the program. Case Planning is an individual process and should acknowledge that every client has different goals and ideas of how to reach those goals.

- The Case Plan is an ongoing process throughout a client's access of services
- The choices of the client are central to the case planning process. It is considered a client-driven activity.
- It is important to use tools to enable you to write the plan as such. Some of these tools include engagement techniques, listening, motivational interviewing, and harm reduction.
- The Case Plan identifies the needs forming the basis of the Goals and Objectives along with the methods/services that will be used to attain them.
- The Case Plan should indicate times frames and who will do what.
- The Case Plan indicates strengths and assets relevant to achieving the stated Goals and Objectives.
- The Case Plan identifies the extent of the client's desire and motivation to change.

Content of a Comprehensive Case Plan –

- Specifies long-term goals
- Identifies measurable, short-term objectives
- Identifies services and other resources needed
- Identifies organizations and/or individuals who will provide the services and resources.
- Identifies the task and responsibilities of the case manager
- Identifies the tasks and responsibilities of the client
- Identifies the tasks of formal and informal supports
- Identifies the skills the person must learn
- Specifies starting and ending dates of services

- Specifies a schedule for subsequent contacts between the case manager, the person and other relevant people
- Specifies what will happen if one of the parties breaks their end of the contract

At a **minimum** case plans should be updated at a minimum every **90 days**. For programs that have shorter length of stay, client case plans should be updated more frequently. As a best practice, it is recommended that case plans be updated every 30 days when possible. **Progress** towards goals should be discussed at every case management appointment. If progress is not seen by action steps in a case plan, get a supervisor involved.

The case plan includes, at a minimum, the following information: 1) name of the consumer; 2) level of barriers to which consumer is admitted; 3) problems to be addressed in the plan; 4) measurable goals; 5) measurable objectives with timeframes; 6) duration, frequency, and type of services to be provided; 7) the date, signature, and credentials of a Homefull staff.

CLIENT RIGHTS, GRIEVANCES, & RECORDS
Consumer Records/Access to Records
(COA: RPM5, PRG2; CSB: M10)

Policy:
Access to records of consumers of Homefull is limited to the needs, purposes, and conditions defined by program guidelines. All procedures are in accordance with the HIPAA Policies and Procedures. All records are stored and maintained in accordance with all applicable HIPAA standards. Medical Records Department will respond to all written requests for records within 14 days of the date of request.

Procedure:
Homefull staff shall have direct access to consumer records. Professionals from outside agencies have access only if signed written consent is obtained from the involved consumer and only for information as specified on the Homefull release of information. The Prohibition to Re-disclose statement that is included with all released information by Homefull is:

"This information has been disclosed to you from records whose confidentiality is protected by Federal Law, Federal Regulations (42 CFR part 2) which prohibit you from making a further disclosure of it without the specific written consent of the person to whom it pertains, or as otherwise permitted by such regulations. A general authorization for the release of medical or other information is not sufficient for this purpose. Federal rules restrict any use of the information to criminally investigate or prosecute any alcohol or drug abuse patient."

Any information released is stamped with the prohibition of re-disclosure statement. Consumers have the right (as included in the Homefull Clients Rights) to access their records upon written request and may review them at a Homefull site. Prior to permitting a consumer access to his/her records, the Director assigned to oversee Medical Records will review the file to ascertain if there is any information which has been tagged as "Not for consumer access." "Not for Consumer Access" information would include documents/electronic data that is considered a Homefull work product created as part of a staff member's work with a client. In general practices, the Director will review the client's record that is for consumer access. In situations where the information has been submitted by another practitioner, the Director will remove that information from the consumer's file and inform him/her that to obtain that information, he/she must consult the practitioner from which the information Homefull obtained the information. Consumer records for access by the consumer typically include the client's case plan and associated notes, initial paperwork included releases of information, and program agreements.

Homefull converted to hybrid electronic records in 2013. Client records following this date are maintained as electronic health records in the Homeless Management Information System for each service area.

At no time will consumers have access to any other consumer's records or Homefull

documentation. The CEO will be responsible for overall control, filing, and safety of consumer records.

Consumers can request to add statements to their records, these statements are included as additional documentation and are indicated as such in the clinical records.

Patient Access Fees

1 to 50 pages
No charge

51 pages or more
$ .10 per page

Processing time for copies of medical records is 14 working days after receipt of written request and valid authorization.

There is no charge for copying and mailing a medical record if it is being sent to another health care provider or facility or if it is being used for a social security disability claim. Medical record requests for social security disability claims must be accompanied by a supporting letter from the Office of Social Security.

CLIENT RIGHTS, GRIEVANCES, & RECORDS
Consumer Records / Releasing Consumer Information
(COA: HSCL7, RPM5, CR2, PRG2; CSB: M2, M10, M19)

Policy:
Homefull protects the rights of privacy of consumers by adherence to the intentions and requirements of applicable laws and regulations governing the release of consumer information. Any information released must satisfy at least one of the conditions listed below:

1. The consumer provides written consent.
2. The disclosure is legally required by court order.
3. The disclosure is necessary to augment emergency medical services and is released only to medical personnel.
4. The information is released for the purposes of program evaluation, audit, or research and is released only to qualified individuals or agencies.

Disclosure of consumer information which does not satisfy one of the conditions described above may be a violation of federal or state laws and therefore may result in criminal prosecution. Any Homefull staff member who is suspected of violating a consumer's confidentiality will be subject to disciplinary actions up to and including termination of employment.

Electronic records will be transmitted in a manner that protects it against unauthorized access and ensures its integrity and availability. To accommodate both the need to protect privation health information and the need for efficient communication in support of client care, client information may be transmitted electronically via electronic storage device per policy and procedure. When the circumstances allow transmission of electronic records, reasonable and appropriate security measures shall be implemented.

The Privacy Rule requires covered entities to provide access to the client records in the form or format requested by the individual, if it is readily producible in such form or format. If it is not readily producible in the form or format requested, access must be provided in a readable hard copy form, or in the alternative, some other form or format as agreed to by the covered entity and the individual. The covered entity also may provide the individual with a summary or may provide an explanation of that which has been provided, so long as the individual agrees to the alternative form and associated fees. See 45 C.F.R. § 164.524(c)(2).

Procedure:
Confidentiality and prohibition to re-disclose information are explained to consumers of Homefull. Each consumer signs a Notice of Privacy Practices, as mandated by HIPAA, and all information contained in such notice is explained to the consumers. Questions are encouraged to ensure understanding of these additional safeguards. Once consumer understanding is assured, a release of information is signed by the consumer or the person authorized to consent (e.g. guardian) specifying the agency to which information is to be disclosed, the name of the individual (when known) who will receive the information, the purpose of releasing the

information, and limitations regarding information as regulated by federal statutes, other legislation, and agency guidelines.

Information from consumer records is disclosed when the appropriate release of information is obtained from the consumer or person authorized by the consumer to provide consent. Only that information as specified on the signed release is provided when releasing consumer information. Any information released is stamped with the federal prohibition of re-disclosure statement. The medical record may include, but is not limited to the consumer's:

a. History
b. Current Medications
c. Documentation of Events
d. Assessments
e. Case Plans, including reviews
f. Discharge Plan, when applicable
g. Discharge Summary for all consumers who have left the organization's services
h. Correspondence pertinent to the consumer
i. Authorizations for Release of Information
j. Documentation of referrals.

Homefull will provide a copy of the medical record via paper copy, printed from the electronic health record. Homefull can transmit an electronica copy of a medial record directly to a third person if designated by the client in writing.

Releases are kept on file and updated as needed. Information concerning any consumer of Homefull contains the prohibition to re-disclose information or accompanied by a statement of prohibition to re-disclose. A blank version of a Release of Information is included in the Appendix. The Prohibition to Re-disclose statement that is included with all released information by Homefull is: "This information has been disclosed to you from records whose confidentiality is protected by Federal Law, Federal Regulations (42 CFR part 2) which prohibit you from making a further disclosure of it without the specific written consent of the person to whom it pertains, or as otherwise permitted by such regulations. A general authorization for the release of medical or other information is not sufficient for this purpose. Federal rules restrict any use of the information to criminally investigate or prosecute any alcohol or drug abuse patient."

Homefull also adheres to all applicable Health Insurance Portability and Accessibility Act (HIPAA) Regulations. All Homefull personnel sign a confidentiality agreement upon hire and a copy is kept in their personnel records.

When a request for records is received, Medical Records Department will verify the request is in writing and accompanied by a valid, signed Homefull release of information (ROI) dated within one year/or Other ROI granting Homefull permission from client to release records. If request is not accompanied by a written request and valid, signed ROI, Medical Records Department will respond to the person submitting the request alerting them to deficiency. Medical Records, or designated staff, will respond to all requests for records within 14 days of the date of the request.

Medical Records Department will attach all records requests to HMIS, update the 'Records Request Tracking Sheet', and send to Director of Administrative Services.

Requests from other agency/professional:

Director overseeing Medical Records will confirm written request and valid, signed ROI and will verify that the request does not violate Homefull policy on re-disclosure. If records request violates Homefull policy on re-disclosure, Medical Records Department will respond to the person submitting the request alerting them to re-disclosure policy and inform him/her to obtain the information from the original practitioner. If valid and appropriate, Director will approve records request, update 'Records Request Tracking Sheet' and send to Medical Records Department. Medical Records Department will compile records specified on ROI to designated electronic storage device, send to requesting agency, and update 'Records Request Tracking Sheet'.

Requests from client:

Director will verify written request and valid, signed ROI and will verify request does not violate Homefull policy on re-disclosure. If records request violates Homefull policy on re-disclosure, Director will contact client and explain re-disclosure policy and inform him/her to obtain the information from the original practitioner.

Director will inform Clinical Director of client request for records. Clinical Director will review records and meet with client to review client record in accordance with Homefull Consumer Records/Access to Records Policy and Procedure. Following the meeting with client, Director of will update 'Records Request Tracking Sheet' for record-keeping.

Receiving Electronic Health Records

Upon the receipt of any requested client records in electronic form, electronic storage device will be sent to medical records. Medical records department will insert electronic storage device into assigned computer and open stored documents. Documents will then be saved to a password protected folder. All documents will then be saved to HMIS client record according to Homefull policy and procedure. Documents saved to password protected folder will be permanently deleted within 48 hours. Electronic storage device will be stored with all other paper forms of chart for seven (7) years. Electronic storage device will then be physically destroyed following guidelines from HIPAA included in the Appendix of this Manual.

CLIENT RIGHTS, GRIEVANCES, & RECORDS
Client Records/Location, Storage, and Destruction of Records
(COA: RPM5; CSB: M16, M17, M19)

Policy:
A prerequisite of assuring confidentiality of consumer information is the requirement that staff members be responsible for maintaining the physical integrity of consumer records. The professional and support staff of Homefull are the only people authorized to unsupervised access to the records of consumers of Homefull and, therefore, they are accountable for maintaining the security of those records.

Homefull uses the Homeless Management Information System (HMIS) as the entire client record system. Staff receive both internal HMIS training as well as external training by the local oversight body staff who oversee HMIS usage for the local Continuum of Care. The software of HMIS was created and is maintained by a third-party entity through contracts with those oversight bodies. Each platform/company is responsible for maintaining security of data and privacy of recordkeeping and maintains its own manual that includes policies and procedures related to Disaster Recovery and the protection of client data.

Procedure:
Paper records of former clients are filed in a secure location at the main administrative office and at some of the program sites in management offices. Access is limited to Homefull staff and to those consumers who request copies of client records on behalf of a client and have permission to see these records. Records are maintained for 7 years from the date of a client's exit from Homefull's services after services are rendered. All records older than 7 years are shredded by Homefull staff or by a 3rd party professional document destruction company that practices HIPAA and ensures confidentiality of all records. Records that are contained on an electronic device such as a memory stick or flash drive will be physically destroyed as per HIPAA regulations. Guidelines for destruction of electronic media are included in the Appendix.

HMIS in each Homefull service area is monitored and maintained by a third party company contracted by the main funder/oversight entity for that local Continuum of Care. All end users are trained in proper confidentiality practices and the system requires frequent password changes. The HMIS Policy and Procedure Manuals for both primary systems used by Homefull are included in the Appendix for reference. Further information about HIPAA compliance and Disaster Recovery can be found within these guides.

TRAINING and SUPERVISION

Service Provider Orientation
(COA: TS1, HSCL2, HR5)

Policy:
All staff of Homefull, including supervisors, will be involved in an orientation program. This orientation will include an orientation to the Policies and Procedures of Homefull.

Procedure:
Upon employment, all staff will participate in an orientation to Homefull. Homefull orientation checklist includes all of the items to which new staff will be oriented, including the Policies and Procedures of Homefull. A copy of the orientation outline is included in the Appendix.

Upon completion of orientation, staff members will sign pertinent forms that will become a part of each employee's personnel file.

The orientation outline is reviewed at minimum annually by the CEO and her appointees.

TRAINING and SUPERVISION

Staff Development

(COA: TS1, TS2, MHSU2)

***Policy*:**

Homefull direct care staff receive initial and annual (depending on the topic) training on the following topics:

- Rights of the Persons Served
- Person and/or Family-Centered Treatment
- Non-Violent Intervention/Work Place Violence
- Confidentiality Requirements
- Cultural Competency
- Expectations regarding Professional Conduct (Code of Ethics)
- Sexual Harassment
- Fire Safety
- Employee Grievance
- First-Aid/CPR

Staff are provided the opportunity to earn Continuing Education Units when appropriate and available.

TRAINING and SUPERVISION
Staff Training – Evaluation and Planning
(COA: TS1, TS2)

Policy:
Homefull will conduct training for staff to increase on-the-job skills as well as knowledge of the service population. Annually an assessment of training needs is conducted and feedback from staff is sought for input.

Procedure:
Homefull will create a training calendar with a variety of topics ranging from mental health and substance use to cultural competence and community resources. This training calendar will offer multiple trainings each month to assist staff to increase their competency, increase their knowledge of the service population, and gather skills for increasing the effectiveness of the work.

Beyond pre/post tests for training competency development, training evaluations will be conducted after trainings but also as general survey feedback. This feedback will be used for adjusting training topics and to give feedback to presenters.

Training effectiveness will be evaluated based on staff feedback and on the increase in competency.

TRAINING and SUPERVISION
Staff Training/Competency Tests
(COA: PQI2, TS2, MHSU2)

Policy:
Homefull will provide training opportunities for staff professional development and will include pre and post testing at onsite trainings in order to examine competence.

Procedure:
At onsite trainings conducted by Homefull staff, and in some cases by outside trainers, Homefull will administer pre and post testing. Scores will be included in monthly Quality Assurance reports to track competency of agency staff. Pre and post test data will be reported without employee names.

In the event that an employee fails a post test for a specific training, the trainer (or Training Coordinator or Clinical Director for non-Homefull trainers) will schedule a follow up session with the employee to conduct a verbal test to determine if the employee can demonstrate comprehension of the subject matter. It is understood that a test fail could be a result of test anxiety or possible learning disorder and is not used solely as determination of an employee's performance. If the follow up verbal "re-test" is considered successful, a letter will be written by the trainer/re-tester to attach to the employee's failed test for their personnel file. If it is determined that the employee does not comprehend the material or is considered a risk based on the subject matter, the employee may be required to re-take the training.

TRAINING and SUPERVISION
Cultural Sensitivity Training
(COA: TS1, TS2)

Policy:
Homefull will pursue the goal of increasing the knowledge and competence of staff members regarding the role, impact, needs, and characteristics of individuals; cultural, racial, ethnic, and societal diversity; and the influences that these variables exert in the delivery of human services.

Procedure:
Homefull will encourage staff to enhance skills and knowledge in job-related training programs including diversity training.

Staff will be encouraged to take part in workshops, offered internally and by outside agencies that provide cultural sensitivity training. Staff will also be asked to provide feedback from these workshops to their colleagues at subsequent staff meetings.

Homefull will make every effort to locate appropriate structured continuing education training sessions relating to cultural diversity. Homefull may also develop their own training programs in this area and utilize the expertise of staff to train each other.

TRAINING and SUPERVISION
Supervision of Case Management Services
(COA: TS1, TS3, CM5, CM10, MHSU2, HSCL10; CSB: E11)

Policy:
Homefull adheres to all requirements of funding entities in providing professional supervision of client case management services by maintaining a staff composed of licensed and credentialed practitioners.

Procedure:
Homefull case management services are supervised clinically by the Clinical Director. Regular supervisory meetings are scheduled to ensure the appropriateness of continued case management services for each individual client as well as coaching opporutnities for developing staff competencies in various clinical topics. Supervisors are qualified by:

- An advance degree in a human service field and a minimum of 2 years post-graduate professional experience; specialized training, and experience in alcohol and other drug use, diagnosis and treatment; and additional training in supervision; and/or
- Certification by the designated authority in the State as approved alcohol and/or drug counseling supervisors

Clinical personnel workloads support the achievement of client outcomes, are regularly reviewed, and are based on an assessment of the following:
- The qualifications, competencies, and experience of the worker, including the level of supervision needed
- The work and time required to accomplish assigned tasks and job responsibilities
- Service volume, accounting for assessed level of needs of new and current clients

Social work, medical, psychological consultants with specialized training in the treatment of alcohol and other drug problems are available, as needed, through formal arrangements when not employed by Homefull.

A table of organization which will illustrate current supervision patterns is included in the Appendix. Program Manager job descriptions are also included in the Appendix.

TRAINING and SUPERVISION
Supervision and Succession Planning
(COA: GOV5, TS3)

Policy:
The CEO will develop and regularly update a succession plan. The CEO will also oversee the development of supervisor job descriptions that include a minimum expectation for supervisory competencies.

Procedure:
The CEO develops a succession plan to examine personnel who are appropriate for potential promotion and leadership. This succession plan is submitted to the Board of Trustees for annual review. This plan will include an evaluation of the current talent pool within the organization, considering key positions and high performers who are identified as promotable. An assessment of what is needed for next steps will also be included. The CEO will include in this plan the point when an external search would be appropriate. The CEO will maintain this plan and provide it to the Board when needed.

The CEO and appointees will develop a list of competencies needed to fill a supervisory position within the organization. This list will take into account any possible credentials or experience needed the complexity of the responsibilities, and capability of fulfilling other organizational requirements.

Program Manager job descriptions are included in the Appendix.

PROGRAM and CLINICAL SERVICES

Overview and Philosophy of Approach
(COA: CM6, CM7, MHSU4, MHSU10; CSB: E1, E2, F1, F5, F6, G1, G3, H1, H6)

The purpose of the *Case Management* program is to demonstrate the effectiveness of a case management model for Homefull's target population including all support services programs like permanent supportive housing, prevention, and rapid rehousing. Goals of the Case Management Programs include:

- To overcome the condition of homelessness and housing instability
- Increase income
- Obtain housing stability
- Link to mainstream benefits

The purpose of the *Mental Health* program is to address mental health symptoms and associated functional impairments, help manage co-occurring health and substance use conditions that affect the consumer's functioning, and provide support for psychosocial adjustments related to life cycle issues.

The purpose of the *Supported Community Living* programs are to provide temporary housing and support (i.e. case management) in a safe environment that encourages a high level of independence for consumers who do not need 24-hour care but are not ready for full independent living. In some cases this might be community living and in other cases it is scattered site housing.

The purpose of the *Workforce Development Support Services* program is focused on 4 key areas: information and referrals; educational advancement opportunities; providing training, job placement, and follow-up; and financial literacy and self-sufficiency through facilitating a variety of job acquisition and promoting economic mobility. Staff support Homefull clients to develop employment stability in order to increase housing stability.

The Family Living Center permanent supportive housing program and many of the Columbus division programs including The Isaiah Project, Master Leasing, and SRA include a *property management* focus. Homefull has developed a Property Management Manual that includes all information related to leases, rent, and property policies.

All consumers will be provided with a Consumer Handbook that details Homefull's approach and services. All Homefull programs utilize a Housing First approach which "prioritizes providing permanent housing to people experience homelessness..." (RRH Fact Sheet: Housing First, NAEH, April 2016).

Policy:
The principle that underscores the services offered by Homefull is that the staff recognizes the

special needs of Homefull's target population and their families. Case Management services are those activities that are provided in order to assist and support Homefull's target population and their families in gaining access to needed medical, social, educational, and other services essential to meeting their basic human needs and either maintain, obtain, or remain housed. Case Management services provided by Homefull staff are NOT time-limited, but are designed according to the needs of the individual client and the program design.

Procedure:

Case Management Services are generally conducted at Homefull program sites, scattered site PSH, or Rapid Rehousing programs via home visits. Other arrangements can be made on an individual basis in situations where the services necessitate that they occur in other locations or when appropriate are conducted as home visits.

Case Management Services are usually conducted in face -to -face sessions but can also occur by telephone. At all times, Case Management Services will be conducted in a manner that ensures privacy and security for the client. Case Management/Service Coordination should include, but not be limited to:

- X Activities carried out in collaboration with the consumer
- X Outreach to encourage the participation of the consumer
- X Coordination of, or assistance with, crisis intervention and stabilization services, if needed
- X Assistance with achieving goals for independence as defined by the consumer
- X Optimizing resources and opportunities through community linkages and enhanced social support networks
- X Assistance with accessing transportation
- X Securing safe housing that is reflective of the abilities and preferences of the consumer
- X Exploring employment or other meaningful activities
- X Ensuring children and youth have equal access to the same free, appropriate public education—including, but not limited to, a public preschool education, early childhood programs such as Head Start, and Part C services in accordance with the Individuals with Disabilities Education Act (IDEA)—as provided to other children and youths
- X Coordinating services with the local McKinney-Vento Homeless Education Liaison to assist families with children or youth in understanding and exercising their rights as protected by the McKinney-Vento Homeless Assistance Act of 1987.
- X Provision of, or linkage to, skill development services needed to enable the consumer to perform daily living activities, including but not limited to:
    1. Budgeting
    2. Meal Planning
    3. Personal Care
    4. Housekeeping and home maintenance
    5. Other identified Needs

Case Management services should also provide evidence of linkage with necessary and appropriate:

- Financial Services
- Medical or other health care
- Other Community Services

The intensity of case management services should be based on the needs of the consumer as identified in his or her individual case plan.

All clients are given choice in their search for safe, decent, and affordable housing within reason and within the scope of the program in which they are referred. In searching for appropriate housing placement, minority clients will not necessarily be placed in a "minority concentrated" area unless by client choice.

Transportation in and of itself does not constitute case management. Waiting with clients for appointments at social service agencies, court hearings, and similar activities does not, in and of itself, constitute case management.

Clinical Counseling Services

Counseling services are part of the behavioral health programming that resonates throughout all Homefull programming. Clients are identified as in need of counseling services through their assessment and case management. Treatment plans are created in collaboration with the client based on their needs and goals. Each person's/family's values are guiding factors in their treatment services. Counseling focuses on personal growth and stability, regulation of mental health symptoms, reduction in harmful behaviors, and housing stability. All Homefull support services, counseling included, come from a client-empowerment, holistic perspective.

Level of need and the intensity/frequency of counseling services are determined in conjunction with the Clinical Director who oversees all clinical services. The Director utilizes a diagnostic assessment as a tool to help determine the level of need as well as the client's interests.

All clinical staff and case management staff engage in training around clinical approaches, establishing rapport, maintaining boundaries, and other social work ethics practices including cultural competence. Homefull uses a trauma-informed care approach and pays significant attention to vicarious trauma and compassion fatigue.

If domestic/intimate partner violence is a presenting concern, clients are referred to partner agencies for DV counseling as well as maintaining support through Homefull for overall clinical stability and housing stability. Any property management program will follow the VAWA requirements of the federal government.

In all Homefull Services programs, a Housing First approach is used. Housing First is "a belief that people need basic necessities like food and a place to live before attending to anything less

critical…" (RRH Fact Sheet: Housing First, NAEH, April 2016). Homefull embraces this belief and trains all Case Management staff to prioritize a housing plan and housing stability above other Case Plan goals and once housed stably to focus on the support services needed in order to continue to be stably housed. These additional support services can include life skills development, alcohol/drug treatment, mental health services, and job searching. The housing first approach does not mandate "problems" be addressed prior to securing housing.

PROGRAM and CLINICAL SERVICES
Admission Criteria
(COA: HSCL3, HSCL5, HSCL7; CSB: A3, A4, D2, E3, E4, E7, E13)

Policy:
Admission to Homefull and provision of its services are extended to all eligible consumers without regard to age, race, sex, sexual orientation, religion, color, creed, nation of origin, HIV status, the existence or perception of impairment or disability, or ability to pay. Religious participation explicitly shall not be made a requirement for accessing services. Homefull prohibits denying admission or terminating assistance based on a client being a victim or survivor of domestic violence, sexual assault, or stalking. The catchment area of Homefull is primarily Montgomery County, OH and Franklin County, OH with certain programs focusing on specific western Ohio counties, and specifically for the Community Transitions Program it is a 15-county assigned area in western Ohio. Effort will be made to suggest possible referral resources for treatment to consumers outside the catchment area. The family unit will be considered the members as they present themselves.

Procedure:
Consumers are presumed to be eligible when:
- X They are individuals and families who are homeless.
- X They are individuals and families who are at imminent risk of becoming homeless.
- X They are individuals and families who are formerly homeless.
- X They are residing in the program catchment area.
- X They express a willingness to participate in programming.
- X They meet other Homefull Program criteria.
- X They are 18 years of age or older, unless accompanied by an adult

Consumers are determined to be ineligible for services when:
- X They reside outside the program catchment area.
- X They refuse Homefull services.
- X They are under the age of 18. (Unaccompanied Minors are referred to Daybreak.)
- X They are actively suicidal or homicidal and require prior stabilization.
- X They are medically fragile to the extent of needing inpatient medical care prior to treatment.
- X They are not at imminent risk of becoming homeless.

Persons accessing support services at Homefull are not charged a fee for program participation.

Consumers accessing Homefull's Rapid Rehousing program through their engagement in Shelter Case Management. Qualifications for Rapid Rehousing require the consumer to be currently homeless.

Consumers accessing Homefull's PSH programs do so through the local coordinated entry referral

system, thereby requiring participation in the homeless system.

For any new referrals, the primary Referral Worker will confirm if the person is already receiving Homefull services in a current program before initiating a new referral.

Homefull is committed to working with community partners to minimize barriers that prevent individuals and families from accessing services. Homefull participates in local housing advocacy groups.

PROGRAM and CLINICAL SERVICES
Admission of Consumers Taking Medication

Policy:
A consumer cannot be denied admission to Homefull due to the use of a prescribed psychotropic medication(s).

PROGRAM and CLINICAL SERVICES
Referrals to Services
(COA: CM4, CM6, HSCL5, CSB: E7, E8, E9)

Policy:
Referrals to other organizations are made for the purpose of addressing consumers' needs beyond Homefull's support services and to enhance them. Referrals to other organizations are also made when an individual is determined to be ineligible, inappropriate, or needs completely different services other than what is provided by Homefull.

Procedure:
As a part of case management support services, Homefull's Case Managers include referrals to community services as part of a normal course of case planning and appointment discussions. Homefull Case Managers are trained on proper referral process for different community resources and are taught to facilitate the connection to needed services to help broaden the base of support for clients.

If a consumer is found to be ineligible for Homefull at time of referral, the consumer/ referral source is immediately informed of the decision via the means of referral (telephone, mail, etc.) At time of notification of ineligibility, the consumer/referral source is informed as to the reasons for ineligibility and offered recommendations for other more appropriate community resources.

Reasons for referrals to other organizations are explained and discussed with consumers and/or with others designated by the consumer as a consumer's advocate.

Obtaining consent will occur per Homefull policy and procedures.

All activity, including referral conversations, is documented on file, in the consumer's record.

PROGRAM and CLINICAL SERVICES
Behavior Interventions
(COA: ASE2, BSM1, BSM2, BSM3, BSM4, BSM5, BSM6, HSCL1, TS1, TS2; CSB: E1, E14)

Policy:
All consumers who are recipients of services from Homefull are entitled to and shall be treated with dignity and respect, in a culture that promotes healing and provides each consumer the support needed to manage his or her own behavior. This policy is inclusive and applies to all Homefull consumers. This policy is in addition to existing state regulations, rules, and policies relating to behavior support and management.

Homefull prohibits the use of behavioral interventions that include, but not limited to, the use of all cruel and unusual punishments and practices, including, but not limited to, physical and verbal abuse. Homefull prohibits using any type of seclusion or restraint on consumers.

The ability to predict, prevent, and handle a behavioral crisis situation when working with consumers is an important component of Homefull staff responsibilities. Since all on-site Homefull staff have direct contact with consumers, all on-site staff, with the exception of executive level staff, will be involved in an agency approved crisis intervention training entitled Right Response and be approved to provide these specific verbal and/or behavioral interventions with consumers in crisis. Any staff member who has not participated in the bi-annual training will not be allowed to intervene with a consumer in crisis and should request assistance from another staff member.

Procedure:
All Homefull staff should receive appropriate training in Nonviolent Crisis Intervention, developed by the Right Response. Right Response is a safe, non-harmful behavior management system designed to help our human service professionals provide for the best possible care, welfare, safety and security of disruptive, assaultive, and out-of-control individuals.

Right Response training stresses that crisis intervention is an integrated, therapeutic process. The primary objectives are:

- To train staff with effective techniques in approaching and reducing the tension of an agitated individual
- To review alternatives if a person loses control and becomes violent
- To instruct staff in techniques to control their own anxieties during interventions and maintain the best possible professional attitude
- To provide staff with nonverbal, paraverbal, verbal and personal safety skills to allow them to maintain the best possible care, welfare, safety and security for all involved.

Only those techniques and strategies taught during this training are supported by the Homefull Program. Staff who fail to utilize the techniques/strategies taught in the training and/or utilize other unapproved behavioral interventions to address crisis situations could face disciplinary actions.

At no time will an employee, contract staff, volunteer, or student intern strike a consumer, prospective consumer, a member of a consumer's family, or a significant other of a consumer. Violation of this policy will result in an investigation of such incident, followed by appropriate disciplinary action.

Homefull's Consumer Handbook, provided to every new client at the client's first meeting, includes a list of services, practices, clients' rights, and more info and is included in the Appendix.

Additionally, in November 2015, current Homefull staff participated in ALICE training (Alert, Lockdown, Inform, Counter, Evacuate) conducted by Montgomery County Sheriff's office staff, certified by the ALICE Training Institute. This training prepared staff for violent intruder situations that go beyond crisis intervention and beyond utilizing Right Response skills.

All staff are instructed to engage 911 when there is a violent intruder, if they participated in the ALICE training, are encouraged to utilize the lockdown and evacuation skills taught as part of the ALICE curriculum. ALICE training prepares staff for worst case scenarios that are beyond the scope of crisis intervention; Right Response should not be used in these extreme situations.

PROGRAM and CLINICAL SERVICES
Behavioral Intervention Risk Assessment

(COA: BSM1, BSM2, BSM3, BSM4, BSM5, BSM6, TS1, TS2, HSCL1; CSB: E14)

Policy:

Homefull will proactively engage in a Behavioral Risk Assessment when a client/household presents threatening behavior that could result in personal self-harm or harm to others.

Procedure:

The Clinical Director ensures that risks are actively identified, analyzed, and managed. Risks will be identified as early as possible so as to minimize their impact. The steps for accomplishing this are outlined below.

Methods for Risk Identification

- Clinical supervision with program staff,
- one-on-one staff supervision,
- caseload review,
- Major Usual Incident (MUI) assessments, and
- Community partner case conferences.

Methods for Risk Analysis

- Historical behavior
- Assess through immediate case management appointment with client/household
- Health and Safety of client
- Health and Safety of other parties i.e. staff, program participants, etc.

Response to Potential Risks

- Case Manager and/or Program Coordinator notifies their Program Manager
- Create a safety plan for the client/household as well as for other parties
- Notify and brainstorm next steps with the Director of Administrative Services
- Notify and brainstorm next steps with the Clinical Director
- Share plans and additional warning signs with program/agency staff
- Alert Right Response Program Manager(s) for input and intervention
- Request intervention and support from local crisis response (e.g. Crisis Now in Dayton and Net Care in Columbus) and/or the local Police Department

PROGRAM and CLINICAL SERVICES
Clinical Supervision
(COA: CM2, CM5, HSCL2, MHSU2, TS3; CSB: E14)

Policy:
Homefull will have a Clinical Director who has demonstrated experience and/or education in case management services. As needed, Homefull will maintain an active contract with an appropriately credentialed professional that will provide clinical support and oversight for any CPST Case Management services.

The contracted clinical supervisor will hold at least one of the following:

1. Physician who is licensed to practice medicine in Ohio by the Ohio State Medical Board.
2. Psychologist who is licensed by the Ohio State Board of Psychology.
3. Licensed Professional Clinical Counselor who is licensed by the State of Ohio Counselor and Social Work Board and whose declaration statement includes substance abuse.
4. Licensed Professional Counselor pursuant to rule 4757-17-01 of the Administrative Code.
5. Licensed Independent Social Worker who is licensed by the State of Ohio Counselor and Social Work Board
6. Registered nurse with the Ohio Board of Nursing who has demonstrated experience and/or education in psychoactive substance disorder treatment.

Procedure:
The Clinical Director will conduct regularly scheduled individual and/or group supervision sessions. This occurs through staff meetings as well as through individual supervision sessions.

The Clinical Director will also be responsible for overseeing service monitoring to ensure continuity of service and care as well as adjustments to case/service plans when a consumer's needs and/or circumstances change.

PROGRAM and CLINICAL SERVICES
Team Meetings
(COA: HSCL4)

Policy:
Program Team Meetings will be held as per Program guidelines with all staff, supervisors. The attendance of participants and the results of these team meetings will be documented by the Program Manager

Agenda items can include, but not be limited to, the following:

- General Program Announcements
- Grant Updates
- In-Service Trainings
- Staffing of active cases
- Financial Status Summaries
- Programmatic Changes
- Other items deemed appropriate by Program Manager, Director, Chief Operating Officer.

PROGRAM and CLINICAL SERVICES
Group/Individual Clinical Supervision
(COA: PQI3, CM5, HSCL4, TS3; CSB: E9, E16, G2)

Policy:
The Clinical Director will be responsible for conducting group clinical supervision sessions at least one time per month and individual clinical supervision on an as needed basis with all clinical staff. The sessions are designed to address:

- Accuracy of assessment and referral skills
- The appropriateness of their treatment or service interventions relative to the needs of each person served
- Treatment/Service effectiveness as reflected by the person served meeting his or her individual goals
- The provision of feedback that enhances the skills of direct service personnel
- Problematic Consumers
- Issues of ethics, legal aspects of clinical practice, and professional standards
- Clinical documentation issues identified through ongoing compliance review
- Cultural competency issues
- Training on clinical topics

The Clinical Director will also conduct a Clinical Quality Review of client records as part of Clinical Supervision.

Procedure:
Group clinical supervision meetings are scheduled to ensure the appropriateness of continued case management services for each individual client. Case managers are offered 1 hour bi-weekly group supervision. Staff members bring to supervision a challenging case for discussion. Clinical supervision will be documented by the case manager through case notes in the corresponding client's electronic chart. For individual clinical supervision, each case manager will be required to submit a request form to their supervisor. The request should include the clinical supervision needs of the case manager, including details of the problematic consumers, consumers who need mental health assessments, and/or case conferences with other agencies. The Case Manager and/or Program Manager can also request debriefing for any and all staff in response to an MUI.

Clinical supervision will include a clinical quality review (CQR), recommendations on the best interventions to use with the clients and action steps with the defined timelines to assist the client in achieving positive outcomes.

PROGRAM and CLINICAL SERVICES
Intake/Triage/Assessment: Supervision of Services
(COA: PQI2, CM3, CM5, MHSU2, MHSU3; CSB: E1)

Policy:
Homefull provides professional supervision of consumer assessments and case plans by conducting both program and clinical supervision sessions at least one time per month for all assessment staff.

Procedure:
Homefull assessment and case plan services are supervised clinically by the Clinical Director and/or contracted clinical supervisor.

Case plan monitoring and assessment scoring are both part of Homefull's QA plan and are part of the performance evaluation for Case Managers and Assessors.

PROGRAM and CLINICAL SERVICES

Assessments

(COA: CM3, HSCL3, MHSU3; CSB: E1, E4, E6, E8, E16, G4, M5)

Policy:

Homefull aims to obtain/perform an Intake/Triage/Assessment for each consumer admitted to programs. In all systems in which it operates, Homefull will engage in the Coordinated Entry process.

Procedures:

Screening and Intake Procedure

- In the Montgomery County, OH gateway shelters, clients are added to a triage list to be seen for an intake assessment within 1-3 business days. This "front door" assessment is required by Montgomery County.
- Front Door Assessment is completed using the standard, approved tool in HMIS.
- At intake to a housing program, homelessness status is documented and if appropriate, chronic homelessness as well.

Assessment Procedure

- Between 7-14 days of entering a program, clients meet with Homefull staff to complete a comprehensive assessment. In Dayton, this assessment is initially completed in the Gateway shelters if the client is destined for PSH.
- In all Homefull housing programs, an annual assessment is updated once a year within 30 days of the person's program entry (up to 30 days prior to 30 days after).
- Assessments will also be updated if a client is considered a "long stayer" in shelter or is recommended for another level-of-care in a supportive service site (see policy on Mid-Level Assessments).
- A Homefull Program Manager and/or the Clinical Director review assessments to monitor accuracy and completeness.

PROGRAM and CLINICAL SERVICES
Case Plans Based On Intake/Triage/Assessment Results

(COA: CM3, CM4, MHSU3, MHSU4, HSCL3, HSCL4; CSB: E3, E8, E12, G1, G3, G4)

Policy:

Individual case plans, or service plans, are based on the Assessment and are developed with active participation of the consumer and are consumer preference driven.

Procedure:

The case plan should be prepared using the information from the Intake/Triage/Assessment and interpretive summary. The individual plan should be based on the needs and desires of the persons served and focus on his or her integration and inclusion into the local community, the family, natural support systems, and other needed services.

The individual plan should also:

- Involve the family/legal guardian of the person served, when applicable and permitted
- Identify any needs beyond the scope of the program
- Specify the services to be provided by the program
- Specify referrals for additional services
- Communicate the information to the consumer in a manner that is understandable
- Be provided to the consumer

The case plan must include the following components:

- Goals that are:
    1. Expressed in the words of the consumer
    2. Reflective of the informed choice of the consumer or parent/guardian
    3. Appropriate to the person's culture
    4. Appropriate to the person's age
    5. Based on the person's strengths, needs, abilities, and preferences
- Specific service or case objectives that are:
    1. Reflective of the expectations of the consumer and the case manager
    2. Reflective of the consumer's age
    3. Reflective of the consumer's development
    4. Reflective of the consumer's culture and ethnicity
    5. Responsive to the consumer's disabilities/disorders or concerns
    6. Understandable to the person served
    7. Measurable
    8. Achievable
    9. Time Specific
    10. Appropriate
- Identification of specific treatment interventions to be used
- Information on, or conditions for transition to other community services

Case Plans should be reviewed as per specific program guidelines; plans should be reviewed and updated every 30 days to reflect consumer's current goals and objectives, as well as progress or lack thereof, if applicable.

PROGRAM and CLINICAL SERVICES
Intake/Triage/Assessment: Services and Privacy
(COA: CM3, MHSU3; CSB: E1, E3, E7, E10)

Policy:
The basis for providing appropriate and effective case management services to individuals is through accurate and thorough assessments and case planning. The assessments provided by Homefull staff are time-limited and include structured face-to-face sessions which evaluate the nature and extent of problems experienced by the consumer.

Procedure:
Assessments are scheduled by Homefull staff and are performed in Homefull's Program Sites. Other arrangements can be made on an individual basis for consumers who may not have easy access to these locations.

The assessments may include family members, legal guardians, significant others, or other collateral sources if the information being requested is intended to ascertain the nature and extent of the consumer's substance abuse or mental health problems and the need for the inclusion of these individuals is documented in the consumer's case plan.

Intake/Triage/Assessment services are conducted in a location and manner that ensures privacy for the consumer. Services are designed to provide the following:

- Assessment of the needs of the consumer
- Identification of the choices available for community resources
- Provision of informational materials pertaining to community resources, when possible
- Identification of services that are culturally and age-appropriate
- Implementation of methods to determine if services were accessed by the consumer
- Provide follow-up, if necessary

PROGRAM and CLINICAL SERVICES
Intake/Triage/Assessment: Qualified Staff
(COA: HSCL2, TS, MHSU2; CSB: E1, E11, E14)

Policy:
The staff of Homefull is multidisciplinary. The core staff include professionals who are licensed LSWs, clinical counselors, and trained others.

Procedure:
Assessment services completed by Homefull are performed by trained professionals under the supervision of Homefull's Clinical Director.

When required trainings are completed, Homefull staff are granted Qualified Mental Health Specialist (QMHS) certificates and receive training for Community Psychiatric Support Treatment (CPST). QMHS certificates are earned only by employees who have a Bachelor's degree in a field related to social services OR have 3 years of experience AND have completed all Homefull-required trainings.

PROGRAM and CLINICAL SERVICES
Intake/Triage/Assessment: Written Assessments
(COA: MHSU1, MHSU2, MHSU3, HSCL3, CM3; CSB: E1, E3, E5)

Policy:

Comprehensive Program Intake/Triage/Assessment should be a part of each consumer's clinical record.

Procedure:

The comprehensive assessment highlights a consumer's strengths and assets, as well as weaknesses and limitations. The assessment includes, at a minimum each of the following:

- Consumer's full name
- The month, day, and year that the assessment occurred
- The length of time (in hours and minutes) of the assessment
- Demographics
- Presenting Problems
- Urgent Needs, including suicide or homicide risk
- Personal strengths
- Individualized Needs
- Abilities or Interests
- Preferences
- Previous behavioral health services including diagnostic information, treatment information, and efficacy of current and previously used medications
- Physical Health History, including current medical needs
- Diagnosis(es)
- Co-occurring disabilities and/or disorders
- Mental Status
- Current level of functioning
- Pertinent current and historical life situation information including age, gender, employment history, legal involvement, family history, history of abuse, neglect, and violence, as well as relationships.
- Issues important to the consumer
- Use of alcohol, tobacco, and/or other drugs
- Need for, and availability of, social supports
- Need for assistive technology in the provision of services
- Risk-taking behaviors
- Level of educational functioning
- Advance Directives, if applicable
- Medication use profile
- Medication allergies or adverse reactions to medications
- Adjustments to disabilities and/or disorders.
- Recommendations for treatment

Program Intake/Triage/Assessment should be completed within the first two sessions with a consumer. Completion of all necessary documentation to place the assessment into the clinical

record should be done within 48 hours of the second session.

The Intake/Triage/Assessment should result in a summary prepared by the case management staff that is based on the Intake/Triage/Assessment data, used in the development of the individual case plan, and identifies any issues and how they will be addressed in the development of the individual case plan. The interpretive summary can address:

- The perception of the consumer of his or her needs, strengths, limitations, and problems.
- Clinical judgments regarding both positive and negative factors likely to affect the consumer's case plan and discharge plan.
- Recommended plans, including any special assessments (including but not limited to diagnostic assessments) or assessments for level of care.
- Housing barriers, length and intensity of case management and expected focus (goals) with recommendations.

If a consumer has been identified as having had a Diagnostic Assessment (DA) completed at another agency, the Assessor will request a copy of the DA from that agency for the consumer's Homefull case record and to use in making a request for appropriate level of care. Should a consumer need a DA completed, a referral will be made to a community provider. If needed, it will be completed by Homefull's contracted clinician and/or qualified staff.

PROGRAM and CLINICAL SERVICES
Intake/Triage/Assessment: Level of Care Determination
(COA: CM3, CM4, MHSU3, MHSU5, HSCL4; CSB: E3, E7, E8)

Policy:
All consumers who present for assessment should be placed in the most appropriate level of care to meet their individual needs.

Procedure:
Consumers Level of Care is determined by the Intake/Triage/Assessment and is developed based the amount of housing barriers a consumer presents with. Any consumer not meeting the admission criteria for Homefull Services is referred for further evaluation regarding the most appropriate program (see policy on Referrals to Other Services).

At entry to a housing program, documentation of homelessness is obtained.

PROGRAM and CLINICAL SERVICES
Intake/Triage/Assessment: Referrals to Other Services
(COA: CM3, MHSU3, MHSU4, MHSU6, HSCL3, HSCL6; CSB: E8)

Policy:
Referrals to other community resources should be made when a consumer is determined to be ineligible or inappropriate to receive services provided by Homefull or when other resources are needed to meet the consumer's goals or stated needs or for service coordination.

Procedure:
When it appears that a consumer could benefit from a referral to another agency or is in need services not offered by Homefull the staff will initiate a Clinical Supervision request for appropriate assistance in meeting the consumer's needs. Reasons for the referral/recommendations or change in current level of care will be reviewed with all parties. All activity surrounding the referral, including correspondences, is documented in the consumer's record.

If crisis intervention services are required, consumers are linked with local crisis response services like Crisis Now in Dayton and Net Care in Columbus. If emergency services are required, consumers are linked with a local hospital of their choice or in life-threatening emergency, staff will call -9-1-1 and collaborate with emergency personnel to obtain needed services for the consumer.

Case Management staff is required to follow up on referrals of consumers post-assessment to determine if services were accessed by the consumer and/or if additional assistance is required. For consumers on active caseloads, the Case Manager is responsible for follow-to to determine if services were accessed by the consumer and/or if further assistance is required. All follow ups will be documented in the consumer's clinical record.

PROGRAM and CLINICAL SERVICES
Case Manager of Record
(COA: CM2, CM4, HSCL2, MHSU2; CSB: G2)

Policy:
All Homefull consumers will be assigned a Case Manager.

Procedure:
Homefull will assign a Case Manager for all consumers as time of referral to the program.

The Case Manager will be responsible for coordinating services by:

- Assuming responsibility for ensuring the implementation of the case plan
- Ensuring that the consumer is oriented to his or her services
- Promoting the participation of the consumer on an ongoing basis in discussions of his or her plans, goals, and status
- Contact with client a minimum of twice a month evidenced by case notes reflecting type of visit, e.g., office visit, community appointment, phone, etc.
- Identifying and addressing gaps in service provision
- Sharing information on how to access community resources relevant to his or her needs
- Advocating for the consumer, when applicable
- Communicating information regarding progress of the consumer to the appropriate persons
- Facilitating the discharge process, including arrangements for follow-up services
- Involving the family or legal guardian, when applicable or permitted
- Coordinating services provided outside of the organization
- Identifying the process for after hours contact

PROGRAM and CLINICAL SERVICES
Providers of Case Management Services
(COA: TS3, CM2, HSCL2, MHSU2, CSB: E14)

Policy:
The staff of Homefull is multidisciplinary. The core staff includes professionals who are licensed social workers, licensed professional clinical counselors, and trained others.

Any staff providing case management services will be trained and approved by the Clinical Director and/or COO.

Procedure:
Case Management Services delivered by Homefull are performed by individuals who have been trained and are qualified professionals. Case Managers will work under the administrative supervision of the Program Manager and clinically under the supervision of Homefull's Clinical Director.

When required trainings are completed, Homefull staff are granted Qualified Mental Health Specialist (QMHS) certificates and receive training for Community Psychiatric Support Treatment (CPST). QMHS certificates are earned only by employees who have a Bachelor's degree in a field related to social services OR have 3 years of experience AND have completed all Homefull-required trainings.

PROGRAM and CLINICAL SERVICES
Procedure for Assigning and Evaluating Workloads
(COA: CM2, MHSU2, HSCL2; CSB: E11)

Policy:
Manageable caseloads and workloads are functions in large part of the number of qualified staff available to handle cases. Caseload/workload strategies are managed by each Program Manager. It is the intent to maintain caseload size in a manageable number within programs. The size is factored by many variables such as staffing levels, program expectations and evidence-based practice models.

Procedure:
Program Managers routinely review case load sizes of all staff. It is then that case managers might be instructed to take on additional clients or move clients onto other caseloads. Clients are informed of changes and given appointments that do not cause any delays. New cases are assigned to Case Managers based on availability of next appointments and current caseload size. All staff are trained the same so there is no need to specify one Case Manager from the other, aside from QMHS status. If there is a conflict that impedes the ability of the Case Manager and/or the client to work collaboratively on goals, a change in Case Manager can be made by their Program Manager.

PROGRAM and CLINICAL SERVICES
Re-Assessments/Mid-Level Assessment Requests
(COA: CM3, CSB: E6)

Policy:
There are two components to the mid-level assessment. Each component is designed to address the individual needs of clients in both the shelters and housed programs. The outcome of the mid-level assessment would be to triage clients into a higher level of care to better meet their individual needs.

Procedure:
Shelter mid-level assessments:
The purpose of the mid-level assessment in the shelters is to appropriately re-evaluate clients who have presented with additional housing barriers not identified at the initial comprehensive assessment. If a client has been in shelter for more than 120 days he or she will automatically be scheduled for a mid-level assessment. The mid-level assessment is briefer and less extensive than a full comprehensive intake assessment. It is designed to identify strictly pertinent information that impacts the client's housing case plan. If the mid-level assessment results in the same housing referral as the initial intake assessment and the case manager/assessor believe the client could benefit from a higher level of care, the case manager/assessor can request for the Clinical Director to meet with the client for a diagnostic assessment.

Process:
Clients are identified by the shelter Program Manager through review of the monthly QA report. Clients are placed on the triage list by the Diversion/Assessment Coordinator and scheduled to meet with an Assessor. The Assessor is responsible for notifying the shelter Program Manager and Clinical Director of any changes in the client's housing referral or a request for a diagnostic assessment. Case managers may also request a mid-level assessment prior to 120 days if they notice significant changes in the client's behavior or increased barriers to their housing case plan.

Housed mid-level assessments:
The purpose of the mid-level assessment in a housed program is to appropriately re-evaluate clients who have presented with additional housing barriers not identified until after the client was housed. If a client has demonstrated the inability to maintain housing independent from assistance received from Homefull, he or she will be scheduled to meet with the Clinical Director for a mid-level assessment to determine appropriateness for an increased level of care.

Process:
Clients are identified by the Case Manager and/or Program Manager through day-to-day case management interactions for the reasons mentioned above. Clients are scheduled individually to meet with the Clinical Director for a mid-level assessment. The Clinical Director is responsible for submitting any housing level of care changes.

PROGRAM and CLINICAL SERVICES
Direct Care Services & Coordination of Therapeutic Services
(COA: CM3, MHSU6, MHSU9, MHSU10, HSCL4, CSB: E6, E8, F8)

Policy:
Homefull's direct care services include assessment, case management, Medicaid-reimbursed CPST (community psychiatric support treatment) case management, referrals, diagnostic assessments for mental health conditions, and coordination of care for ongoing mental health and substance use disorders. Homefull will train staff for these services, issue Qualified Mental Health Specialist certificates as appropriate, and ensure a high level of care for each client receiving services. Homefull primarily focuses on diagnosis, assessment, and referral services. In all support services, care coordination, and direct case management provision, Homefull seeks to increase a client's community supports in order to help stabilize their mental health, physical health, and housing status.

Procedure:
Through assessment tools including the Front Door Assessment and a Diagnostic Assessment, case management and clinical staff are able to determine the level of care needed for a particular client in the areas of mental health and substance use disorders. Should the client be eligible for or already receiving Medicaid and a Diagnostic Assessment determines that support services are needed, the client may be enrolled in Homefull's CPST case management services. CPST services focus on helping a client reduce symptoms of mental health disorders, increasing a client's understanding of his/her diagnosis, assisting in developing coping skills, developing harm reduction practices to reduce impacts of addiction disorders and decrease the chance of relapse, and assisting in reducing the impacts of trauma in the client's life as well as the areas of general case management services which include life skill development and employment/income attainment to promote housing stability. CPST and general case management services are provided in both individual and group formats.

Clients in need of treatment for mental health or substance use disorders will be referred for immediate and interim emergency psychiatric treatment to our community's Crisis Now/Net Care and for ongoing therapeutic services to a local community mental health center (CMHC) or alcohol/drug treatment program while linked with Homefull's case management services. Homefull Case Managers will coordinate the care of the client via ongoing communication with the mental health providers, through case planning discussions with the client, and joint case conferences as needed. Case Managers will support the client's need to access these vital services by helping to reduce any barriers to care including but not limited to transportation assistance, making/rescheduling appointments, attending appointments with clients if desired, and helping to coordinate child care if needed.

Homefull accesses services for clients at local CMHC's and addiction disorder treatment programs as listed in the Homefull Community Resource Guide. Homefull has a long-standing

relationship with the Samaritan Homeless Clinic, which provides free, ongoing medical and mental health services to people experiencing homelessness.

Case Management services can occur at Homefull program sites, as home visits, or in other community settings. Case Management services are usually conducted in face-to-face sessions but can also occur by telephone. At all times, Case Management services will be conducted in a manner that ensures privacy and security for the client including when using any electronic devices for accessing client records or forms when in the community.

Homefull maintains a memorandum of understanding agreement with our community providers who provide psychiatric and other mental health services.

PROGRAM and CLINICAL SERVICES
Provision of Telehealth Services
(COA: CM4, MHSU6, MHSU9, MHSU10, HSCL4, PRG4, RPM1; CSB: E6, E8, F8)

Policy:
When allowable by oversight bodies and the Ohio Department of Medicaid, qualified Homefull staff will be allowed to conduct telehealth services to meet the needs of clients while maintaining any required safety protocol related to limiting in-person interactions or when deemed appropriate for the client's needs. As such, Homefull will follow all protocol and guidelines set forth by the Ohio Department of Medicaid, including policies and directives issued during the COVID-19 pandemic in 2020.

Procedure:
In the Ohio Governors Executive Order 2020-05D, emergency rules were established to provide for Mediciad-reimbursable telehealth services. These were expanded via the Telehealth Rule (516-1-18) which provides guidance from the state of Ohio regarding provisions of telehealth services. These rules include services provided by Homefull staff (specifically diagnostic assessments and CPST case management services). Homefull staff will follow all rules related to billing processes, coding, reporting, recording of case notes, and conducting of services.

Homefull staff are only able to provide telehealth services under these guidelines and all other pertinent service provision guidelines must remain in places including but not limited to client confidentiality, mandated reporting, and recommended frequency/duration of client contacts.

PROGRAM and CLINICAL SERVICES
Procedure for determining when psychiatric involvement is necessary
(COA: CM7, MHSU 2, MHSU6, MHSU11, CSB: E14)

Policy:
Staff will be trained how to identify when psychiatric involvement is necessary during their initial orientation to Homefull, Responding to Crisis training, and through ongoing clinical supervision.

Procedure:
In general, the aims of psychiatric involvement within the homeless setting are 1) to ensure the safety and stability of the consumer, 2) to collect sufficient history and mental health data from appropriate sources to assess the consumer's individual needs, and 3) to appropriately formulate housing case plans. If a client reports a history of mental illness, efforts are made by the case manager to obtain mental health records from the appropriate sources. Data obtained from these sources helps to formulate individual housing/ case plans.

In the event of a crisis, psychiatric involvement may be necessary if a consumer is actively suicidal, homicidal, and/or exhibits other psychiatric symptoms which need immediate attention of a mental health facility. If crisis intervention services are required, consumers are linked with Crisis Now in Dayton and Net Care in Columbus. If emergency services are required, consumers are linked with a local hospital of their choice or in life-threatening emergency, staff will call -9-1-1 and collaborate with emergency personnel to obtain needed services for the consumer.

Homefull maintains a memorandum of understanding agreement with our community providers who provide psychiatric services.

PROGRAM and CLINICAL SERVICES
Terminating Services against Program Advice
(COA: CM8, HSCL8, MHSU11, CSB: E9, E12, F4)

Policy:
Terminations that occur against the advice of the program include those cases where consumers fail to comply with the goals defined in the case plan, or when the consumer fails to return for services.

Procedure:
All recommendations are explained verbally and put in writing for the consumer.

Every effort is made to ensure that the consumer understands the ramifications of his/her decision not to follow recommendations.

It is communicated to these individuals that they can request assistance at any time in the future.

A discharge summary is completed and placed into the consumer record within thirty days following termination.

PROGRAM and CLINICAL SERVICES
Discharge Criteria & Process of Case Closing
(COA: CM6, CM8, CM9, HSCL7, HSCL8, MHSU11, MHSU13; CSB: A4, E2, E9, E12, F4, F8, H6)

Policy:
Discharge Planning will be initiated with consumers at the earliest possible point in the individual planning and service delivery process. Consumers will be reassessed on a regularly scheduled basis to determine possible need for discharge and/or transfer from current level of service. Case Managers will complete specific documentation related to a consumer's discharge and specific process will be followed for handling personal belongings when a consumer exits the program without their belongings.

Homefull follows the Housing First model in all programs including our prevention services, shelter case management, community case management, housing programs and support services. As stated in the HUD info sheet titled Housing First in Permanent Supportive Housing:

> Housing First is an approach to quickly and successfully connect individuals and families experiencing homelessness to permanent housing without preconditions and barriers to entry, such as sobriety, treatment or service participation requirements. Supportive services are offered to maximize housing stability and prevent returns to homelessness as opposed to addressing predetermined treatment goals prior to permanent housing entry."

Procedure:
Discharge planning will begin at the 1st case management program. Discharge goals will be documented within the case plan and updated every 30 days. Movement toward transition will be consistently discussed with consumers throughout their stay in Homefull programs to ensure their readiness to transition to discharge or alternative housing when this is most appropriate for the consumer. In some cases, a case conference may be called to discuss concerns about compliance and/or other issues related to the client in order to prevent premature discharge or facilitate an appropriate discharge.

For all persons being discharged from service an exit summary must be prepared in HMIS documenting the client's:

- reason for discharge,
- destination,
- housing status.

Homefull case notes and case plans will illustrate the client's:

- date of discharge from the program,
- goals achieved during program participation,
- progress in his/her own recovery or move toward well-being,
- identification of the person's needs for support systems or other types of services that will assist in continuing his/her own recovery or well-being.

Reasons for Program Discharge:

1) Consumer expresses a desire to discontinue services,
2) Consumer is no longer a resident of the program's catchment area,
3) Consumer fails to return to the program,
4) Consumer is actively suicidal, homicidal, and/or exhibits other psychiatric symptoms which need immediate attention of a mental health facility,
5) Consumer interferes with the operation of the agency and/or the participation of other consumers in their treatment.
6) Consumer violates program rules by:
    - assaulting or threatening staff or other clients,
    - using or selling drugs on the premises,
    - weapons on program property or at program sites,
    - theft of Homefull property or funds.

Homefull does not discharge based on the following:

1) having too little or no income,
2) active or history of substance abuse,
3) having a criminal record (with the exception of state-mandated restrictions),
4) fleeing domestic violence,
5) failure to participate in supportive services,
6) failure to make progress on service plan,
7) and any other activity not covered in a lease agreement (for Homefull owned properties).

In the event of an eviction from a Homefull owned/operated property and the tenant vacates the property without removing their personal belongings, Homefull will maintain the personal belongings for no more than 72 hours. Due to the nature of the property, the vacated unit will need to be repaired and cleaned in preparation for a new tenant to move in. Any belongings not claimed/removed within 72 hours, unless other arrangements have been made with the Property Manager, will be disposed of to the appropriate sanitation facility.

In the event of the death of a consumer, the person listed by the consumer as an emergency contact will be contacted for instructions regarding the consumer's belongings. Should the emergency contact not be reachable, or if the contact does not wish to collect the consumer's belongings, all personal affects will be disposed of to the appropriate sanitation facility. If no arrangements are made or no emergency contact is available, disposal will occur after 7 days. Due to the nature of the programming and potential complications, belongings cannot be donated or dispersed to other consumers.

PROGRAM and CLINICAL SERVICES
Progress Notes/Case Notes
(CSB: G2)

Policy:
Signed and dated progress notes should be completed following all consumer interactions.

Procedure:
Signed and dated progress notes should be completed within 48 hours of service provision and document achievement of identified goals and objectives, significant events or changes in the life of the consumer, and the delivery of services and specific interventions that support the individual plan.

In the case of electronic case notes in HMIS, case notes are signed by selecting Case Manager of record from a drop-down menu and by typing the Case Manager's name and credentials at the end of the case note.

PROGRAM and CLINICAL SERVICES
Services for Consumers
(COA: MHSU1, CSB: E8)

Policy:
Homefull will seek to provide opportunities for consumers to develop skills, increase functioning, and identify areas needed for life skills development.

Procedure:
Homefull works with partner agencies and volunteers to offer a range of workshops at program sites and within the community. A sample list of classes is included in the Appendix.

WORKFORCE DEVELOPMENT AND SUPPORT SERVICES

Overview and Philosophy of Approach

Homefull's Workforce Development and Support Services are part of the Homefull Solutions business line and are based throughout our programs and in community-based settings. Services are focused on 4 key areas: information and referrals; educational advancement opportunities; providing training, job placement, and follow-up; and financial literacy and self-sufficiency through facilitating a variety of job acquisition and promoting economic mobility. WDS services are primarily based within the home and participating shelters. The services provided focus on positive development for the participants to increase housing stability by increasing financial stability. The social enterprises that are included in Homefull Solutions provide on the job training and real-world employment opportunities for clients to build their resumes and earn an income.

The Workforce Development and Support Services program emphasizes the importance of networking, interviewing skills, resume building, financial budgeting, and of course, support. Qualifying demographics include, but are not limited to, individuals on public assistance; clients without a high school diploma; those involved with the justice system; migrant and seasonal workers; relocated immigrants and refugees; retirees reverting to the workforce; dislocated or low-income incumbent workers, and military veterans searching for civilian work. Developing a program where participants interact with their Case Manager to discover suitable professions affords these individuals the ability to increase their self-sufficiency and expand their skill set.

Program Components & Access to Services:

Homefull utilizes a variety of outreach strategies to inform prospects about the services provided and how to gain access to those services. Homefull Solutions employees and training participants come directly from a current client pool and are referred by their Case Manager. Outreach strategies are in place throughout the different program sites associated with Homefull. Job boards are located in all program sites and are actively updated with information pertaining to potential applicants an include information on opportunities both within Homefull and in the community at large. These job boards demonstrate the available lines of work participants can apply to, discusses the ways to go about applying for positions, which positions are available if a criminal record is associated with a prospect, and how to interview appropriately for a specific position. In addition to the job board postings, a regular employment newsletter is sent out to the program sites highlighting employment opportunities, interviewing skills, and occupational assistance programs for individuals with various demographics.

Additionally, case Management staff share information with each other about job prospects like job fairs in the community.

Homefull has developed relationships with several organizations within the community creating partnerships to assist patrons with Workforce Development and Support Services. Community partnerships with BarryStaff; Bureau of Vocational Rehabilitation (BVR); Goodwill Easter Seals; Block by Block, and Synchrony Financial facilitate employment search and assistance, educational guidance, vocational counseling and training, and financial literacy. Participation with these community partnerships enables users to expand their skill set and increase their self-sufficiency.

Personnel:

Homefull Solutions is overseen by the organization's Chief Business Development Officer, with shared oversight involving the CEO, CSO, and COO. Day to day assignments and management duties are handled by assigned supervisors. Other HS staff include those involved with the training program and the onsite supervision of day labor assignments. Case Managers work with clients on employment-related case plan goals and accessing opportunities for additional development and/or jobs. All Homefull staff engage in orientation and ongoing training to increase skills related to rapport building, service coordination, and client-centered case planning. Credentials for staff are maintained in personnel files and training records.

Workforce Development
Community Partnerships

Policy:
Homefull will work with local employers and staffing agencies to provide access to employment for its clients, whether they have worked with the internal training program or are just seeking placement with an outside employer. Homefull will establish and maintain a Business Advisory Committee to engage community members.

Procedure:
Employers within the local community that Homefull has developed relationships with in order to foster employment opportunities for consumers included, but is not limited to: Lowes, Barry Staffing, Proctor and Gamble, Block By Block, and the Downtown Dayton Partnership. In addition, consumers are referred to Goodwill Services for workforce skills training within their Miami Valley Works program. Partnerships have been created with Lowes for trainings for those clients who wish to build their skills in property maintenance such as: painting, plumbing, electrical, drywall and other relevant areas.

Homefull staff constantly work with many local entities to coordinate the highest level of care possible for the clients that they work with. This includes coordination of care and referrals to Eastway, DayMont and South Community (community mental health providers), contact with local hospital networks such as Premier Health Systems and the Kettering Health Network. In addition, clients who wish to further their education or job training are often referred to Sinclair Community College and Goodwill Services' Miami Valley Works division.

For almost all of the clients that are served, there is a very close and constant collaboration with Greater Dayton Premier Management for housing placement whether it be at one of their own sites or through the approval process of a voucher-based subsidy at either Homefull's permanent housing programs or in a scattered living setting.

Homefull is also recognized for the work it does on not only the local level but also the state and national level. Staff and administrators regularly present at conferences, assist in developing policy and advocate for funding and change at all levels. Homefull is also a member of Montgomery County's Homeless Solutions Policy Board which is where the coordination of the local Continuum of Care and policy decisions occurs.

To ensure that services are coordinated and comprehensive, Homefull establishes arrangements with local employers and community service providers, given geographic, administrative, and budget constraints.

A Business Advisory Committee was formed that meets at least twice per year to provide guidance to Homefull administration and staff as well as to create linkage for increased access to employment and

training opportunities within the community. Homefull communicates on a regular basis with this group and also all other stakeholders through various means, including: the monthly e-newsletter, Homefull Happenings, a bi-monthly internal newsletter that focuses on employment and training opportunities, Homefull Matters – Employment Edition, and regular emails as needed.

In addition, Homefull maintains contact through personal meetings with service providers, refers clients for workforce training to local entities – Goodwill and the Bureau of Vocational Rehabilitation – and also its own internal social enterprise training program – Homefull Solutions, LLC.

To ensure effective and efficient service delivery, the organization maintains a comprehensive resource database of community service providers and potential employers that is accessible to direct service personnel.

Homefull utilizes Donor Perfect fundraising database to maintain its employer pool where contact information, biographical information and pertinent employment updates are housed. In addition, Homefull utilizes YESS interns from the University of Dayton as well as its own internal Homefull Solutions staff to maintain information on community service providers where clients can be referred for: job training, housing, mental health and AOD services, healthcare and other services.

Workforce Development
Assessments, Case Plans, and Case Management

Policy:
Homefull's approach includes an assessment, case plan, and ongoing case management. In order to be placed in a sustainable position, applicants will undergo a questionnaire regarding their employment history, personality type, and interests. Case Planning for WDS, like all client-focused work at Homefull, will be approached as a partnership and will be client-driven. Ongoing case management will be strengths-based and will focus on supporting housing stability as well as economic stability. Homefull's WDS programming will be culturally competent and be client-focused in goal planning.

Procedure:
Criteria included in the conducted employment assessment will test an individual's financial literacy, self-sufficiency, critical thinking, personality, and occupational skill sets. Through the criteria listed, an individual is going to be able to apply existing knowledge on the subjects they are being tested on, while learning new knowledge to use and apply in their chosen occupation. The criteria mentioned is to assess potential employees' knowledge on the subjects listed to ensure stability in their desired job.

Homefull staff members are able to meet with clients one on one to determine their interests, skill sets, and availability in the employment planning process. Assessments will occur within 2 weeks of identifying that the client will join WDS services. Assessments will include, but not be limited to, gathering information on previous work experience, relevant life experience, interests and aptitudes, goals, training needs, strengths, support networks, and any potential barriers to employment. Discussing prior employment history and researching future employment options allows staff members to better assist clients in their job search. Job boards are updated throughout Homefull facilities to provide clients with information on potential employers for their own job search. Monitoring procedures are followed through routine supervision meetings with Homefull staff members assisting clients with employment searches or clients who have acquired employment. Supervisions are in place to keep up to date with the client's job search and if they have landed a position, how that position is working out and what knowledge they are gaining from the experience.

Case Plans are developed with the client's input and all clients sign a case plan acknowledgement form, verifying their participation in the creation of the plan and goals. Staff receive training related to creating case plans and in services available to all clients. This training is included as part of orientation and as ongoing development. Training is also provided on an individualized basis if needed based on quality assurance checks of the employee's work.

Homefull utilizes a variety of employment databases to maintain employer information for the individuals seeking employment through their services. Homefull Solutions has maintained partnerships with various community service providers that allow for referrals to assist clients in: interview practicing, resume building, budgeting, and job placement.

Workforce Development
Job Development, Training, and Professional Development

Policy:
Homefull will maintain a curriculum for the Homefull Solutions training program that includes a variety of skills building in both classroom and hands-on opportunities. The program will maintain handbook that includes the outline of the training program, expectations, and completion requirements. To assist with job development and placement, Homefull will maintain practices around staying abreast of changes in trends and needs in the local economy.

Procedure:
Homefull created a social enterprise in 2014 – Homefull Solutions, LLC – to assist the homeless clients it serves to acquire additional soft and relevant job skills through a training program. Within this division of the organization, clients enter into a training program that can be within one or all of three operation lines: urban agriculture, landscaping and property maintenance. Clients are trained on basic employment skills such as commitment to a set schedule; expectations of an employee within an employment setting; safety and workplace policies; interviewing and resume building; customer service and leadership skills.

Employees are given regular feedback on their growth and performance during the training period and upon completion of the one hundred twenty hour program are eligible for placement within Homefull Solutions if positions are available or are marketed to partner employers and staffing firms for placement within the public sector.

Case management is offered to all clients placed in either scenario to assist with job retention and housing stabilization. They are also offered classes that focus on budgeting and money management, life skills and other relevant topics. Individual job seekers are given listings of job openings related to skills that have been identified for that person. Support while on the job is vital to job retention, so Case Managers create opportunities to check in on how jobs are going, offer support to address any roadblocks, and discuss job satisfaction with client. Transportation and financial assistance for uniforms and equipment is offered through bus tokens and/or passes to alleviate these barriers to employment. Additionally, for clients who are hired by Homefull Solutions, employment support is provided by a Case Manager and through collaboration with Homefull human resources. Support services in general address all barriers to job retention including child care and alcohol/drug issues similar to Homefull's work in housing-focused case management focusing on the barriers to housing.

Through internal newsletters and site postings, as well as communication with all staff, employment trends and needs are regularly communicated within the Homefull workforce development program. The organization's focus on ending homelessness is assisting clients in overcoming the root cause, which is poverty. This means that we focus on providing the training, support and assistance needed to acquire employment with livable wages. Homefull maintains communication with local industry leaders regarding their employment needs and trends. Staff is kept up to date on new training

opportunities and employees are provided with flyers and pertinent information whenever a new training is offered. Local industry leaders are also invited to participate in a biannual business advisory committee meeting, at which, trends and placement needs are addressed. Ongoing communication occurs with employers while clients are receiving case management – post employment and housing – so that the case manager and client are able to navigate the pressures and challenges that come with a new job and overcoming associated barriers to continued employment.

Employees are given regular feedback on their growth and performance during the training period and upon completion of the one hundred twenty hour program are eligible for placement within Homefull Solutions if positions are available or are marketed to partner employers and staffing firms for placement within the public sector.

Employees are given the opportunity to receive supplemental trainings offered by area partners including Lowe's, East End Community Center, and Sinclair Community College to further advance their job skills and readiness for mobility. Employees are eligible through direct referral by Homefull. Additionally, if ESL or GED classes are part of the assessment, referrals to this educational need are provided. Homefull hosts a biannual business advisory committee, whose primary directive is to discuss trends, placement needs, and relevant training deficiencies. These communications allow for employees of the program to be current with relevant trainings which reflect area employment needs.

Training schedules are flexible based on the needs of the employee. The program operates during normal business hours, but staff may be reached after hours, as needed. Additionally, employees may utilize webinars and web-based trainings to further their training at their own convenience. Employees may be referred to close partners who provide additional training opportunities. Homefull partners with disability-focused training programs including those with Goodwill Easter Seals and BVR. These programs are specialized to assist individuals with disabilities in returning to the workplace. Employees of the program may receive direct referral to these opportunities via Homefull Staff. It is the practice of the WDS training program to not place a client for a work assignment within the program site where he/she currently resides. This protects confidentiality for all parties.

The training program includes job readiness topics like workplace practices, diversity in the workplace, conflict resolution and working well with others, time management including tardiness and handling absences, task management, stress reduction, basic computer skills, and financial literacy. The curriculum for this training program is reviewed regularly by our Workforce Development Workgroup and our Business Advisory Group. The program manual will contain detailed curriculum information including training class outlines and rules of the program.

Workforce Development
Financial Literacy & Skill Building

Policy:
Homefull collaborates with financial advisors and educators to provide comprehensive financial asset building services. Case Managers refer any client within Homefull's continuum of services for these classes. The target areas addressed with this service include: understanding banks, understanding basic financial terminology, predatory lending, budgeting, paying bills, prioritizing debt, etc.

Procedure:
Using a variety of community partners and online resources, Homefull's WFD training program will include financial literacy courses customized to the population trends and needs. These courses include training on banking, how to maintain good credit, debt management, process of paying bills, planning for the future, avoiding predatory lending, and more. The curriculum for this is based on our community partner who provides the direct training for this from their curriculum. Homefull regularly partners with local credit union teams who are trained for financial literacy education. An outline of the financial literacy section of the training program is included in the program manual.

Community resources are provided to all consumers at each case management meeting based on identified needs and based on barriers to financial stability that have been identified in the participant's assessment.

HOMEFULL PERSONNEL POLICIES

This collection of Personnel Policies is designed to acquaint you with Homefull and provide you with information about working conditions, benefits, and policies affecting your employment.

This information applies to all employees of Homefull. Following the policies described in this Manual is considered a condition of continued employment. However, nothing in this Manual alters an employee's status. The contents of this Manual shall not constitute nor be construed as a promise of employment or as a contract between the Company and any of its employees. The Manual is a summary of our policies, which are presented here only as a matter of information.

You are responsible for reading, understanding, and complying with the provisions of this Manual. Our objective is to provide you with a work environment that is constructive to both personal and professional growth.

This printing supersedes all previous Personnel Policies and memos that may have been issued from time to time on subjects covered in this Manual.

However, since our business and our organization are subject to change, we reserve the right to interpret, change, suspend, cancel, or dispute with or without notice all or any part of our policies, procedures, and benefits at any time. We will notify all employees of these changes. Changes will be effective on the dates determined by Homefull, and after those dates all superseded policies will be null.

No individual supervisor or manager has the authority to change policies at any time. If you are uncertain about any policy or procedure, speak with your direct supervisor.

HOMEFULL PERSONNEL POLICIES
General Information
(CSB: A4, A12, E1)

CULTURE & VALUES

- Genuine caring and sensitivity to needs of the homeless population
- Belief in the dignity and worth of all
- Integrity and professionalism
- Tenacity and stamina in meeting members' needs
- Teamwork approach within the agency

GENERAL EMPLOYMENT PRACTICES Homefull's objective is to provide fair and equal opportunity for employment advancement and all other aspects of the employment relationship in an environment where unlawful discrimination is not permitted.

The following list represents, without limitation, applicable Federal legislation regarding employment and employee benefits with which Homefull complies:

- The Americans with Disabilities Act (ADA) and amendments (ADAAA)
- The Age Discrimination in Employment Act (ADEA)
- The Equal Pay Act (EPA)
- The Employee Retirement Income Security Act (ERISA)
- The Fair Labor Standards Act (FLSA)
- Title VII, The Civil Rights Act of 1964
- Immigration Reform and Control Act of 1986
- COBRA (the Consolidation Omnibus Budget Reconciliation Act)

The CEO is available to counsel employees who have problems, complaints or suggestions on any employment or management practice to create a more productive working environment and to provide an opportunity for employees to express their viewpoints.

Employment at Homefull is non-contractual, for no fixed period and terminable at any time by either party. The employee is free to end the relationship at any time, for any reason, and Homefull reserves the same right to terminate employment at any time, with or without cause and with or without notice.

The language used in these statements and policies is not intended to bind Homefull to any express or implied contract. In particular, nothing in this document creates any employment contract between Homefull and any of its employees. The CEO has the exclusive responsibility for final interpretation. Statements, policies and benefit plans may be revised, changed or amended at any time by Homefull.

HOMEFULL PERSONNEL POLICIES

Equal Employment Opportunity

(COA: HR2; CSB: E1)

Policy:

Homefull prohibits employment opportunity discrimination against a qualified individual on the basis of race, color, ethnicity, religion, sex, national origin, disability, age, sexual orientation, ancestry, union activity, or political affiliation.

Procedure:

Homefull management will promote equal employment opportunity in all human resource functions to include, but not limited to, the practices of recruitment, interviewing, hiring, promotion, education and development, compensation, benefits, performance management, layoff or termination.

HOMEFULL PERSONNEL POLICIES
ADA

AMERICANS WITH DISABILITIES ACT (ADA)

Policy:
Homefull prohibits discrimination against individuals with disabilities. In doing so, it will make reasonable accommodations, whenever necessary, for all employees or applicants with disabilities provided the person is otherwise qualified to perform the essential functions of the job. The accommodation shall not constitute a direct threat to the health or safety of the individual, others or property. Additionally, the accommodation shall not impose an undue hardship on the operations of Homefull.

Procedure:
Upon an employee requesting an accommodation for a disability, the person receiving the request should immediately connect the employee to Homefull's HR Team. An employee may also contact the HR Team directly themselves to request a needed accommodation.

An HR Team Member will provide a Request of Accommodation Form to the employee. This form includes a section completed by an HR Team Member specific to the employee's position requirements and a section for the employee's medical provider to verify the disability accommodations needed to perform the assigned role. Examples of possible reasonable accommodations are: job restructuring, modification of equipment or devices, part-time or modified work schedules if appropriate for the position, and reassignment to a vacant position.

<u>Determining Appropriate Accommodation:</u>

1. The determination of which accommodation is appropriate in a particular situation involves a process in which Homefull and the employee's provider identify the precise limitations imposed by the disability and explore potential accommodations that would overcome those limitations.
2. All cases where a reasonable accommodation request is considered must be thoroughly documented as to the nature of the disability and accommodation requested, the accommodations which are considered, costs of each possible accommodation and whether it creates an undue hardship on the operation of Homefull, and if provided, the type of accommodation.
3. Within 30 days of receiving the completed Request of Accommodation Form, the HR Team will make the final recommendation to the CEO regarding the accommodation request and the CEO will make the final determination.

HOMEFULL PERSONNEL POLICIES
Immigration Compliance Policy

Policy:
In accordance with the Immigration Reform and Control Act of 1986, Homefull employs only those individuals who are authorized to work in the United States. All individuals who are offered employment are required to submit documentary proof of their identity and employment authorization within three days of actual employment (as distinguished from the "hire" date). Individuals to whom an offer has been made will be required to complete, and sign under oath, U.S. Citizenship and Immigration Services Form I-9. This form requires that employees attest that they are authorized to work in the job for which they have been hired and that the documents submitted to establish this right are genuine. Employees authorized to work in the U.S. for a limited period of time must maintain their legal status and will be required to update their I-9 form with appropriate documentation before the expiration of the authorized employment period. The execution and maintenance of the I-9 form are the responsibility of the Fiscal Director. Regardless of one's visa status, Homefull is an AA/EEO employer and does not discriminate upon the basis of national origin or citizenship.

HOMEFULL PERSONNEL POLICIES
Work Environment
(CSB: E14)

SAFETY

POLICY: To assist in providing a safe and healthful work environment for employees, Homefull has established a workplace safety program. This program is a top priority for Homefull. The safety committee has responsibility for implementing, administering, monitoring and evaluating the safety program. Its success depends on the alertness and personal commitment of all. All full time staff receives CPR/First Aid Training and Non-Violent Crisis Intervention Training. Please reference appendix for Safety Procedures per location. Please reference appendix for Communicable Diseases Chapter 3701-3 of Ohio Administrative Code.

SEE HEALTH AND SAFETY SECTION IN POLICIES AND PROCEDURES FOR SPECIFICS

PROCEDURE:

- Homefull provides information to employees about workplace safety and health issues through regular internal communication channels such as staff meetings, case conferences, bulletin board postings, memos and other written communication.
- Employees receive periodic workplace safety training. The training covers potential safety and health hazards and safe work practices and procedures to eliminate or minimize hazards.
- Homefull provides a safe and secure building for its employees with an emphasis placed on security. The building is secured with only appropriate staff having keys and security codes to enter. Video cameras are placed in locations that are generally hard to secure to add more safety upon entering and exiting the premises.
- Each employee is expected to obey safety rules and to exercise caution in all work activities. Employees must immediately report any unsafe condition to their supervisor. Such reports are necessary to comply with laws and initiate Workers Compensation benefits procedures.
- Homefull does not purchase, receive, store, distribute or return medications, thereby eliminating potential risk for medication misuse.

HOMEFULL PERSONNEL POLICIES
Standards of Conduct
Employee Conduct
(COA: RPM1, ASE2)

Policy:
Homefull upholds ethical standards in all agency activities and business with customers and suppliers of sound business character and reputations. These standards of conduct also apply to employees' relationships with one another. Each employee has a duty to respect the basic human dignity of others within Homefull. Professional staff are required to abide by the codes mandated by their certifying or licensing bodies. Homefull follows the National Association of Social Workers Code of Ethics and all staff are expected to follow this Code of Ethics. All staff are required to uphold Client Rights.

While these are general principles to guide employees in making ethical decisions and conducting themselves both personally (where it may impact the workplace) and professionally, they are not intended to address every situation and nothing prohibits or restricts the Agency from taking corrective action on any matters pertaining to employee conduct, whether or not they are expressly discussed in this document. Conduct in an employee's personal life that may impact one's ability to perform expected tasks, may compromise the integrity of the organization, or may be in conflict with the mission and goals of the organization may be reviewed for disciplinary action.

Procedure:
It is the policy of Homefull to comply with all applicable laws including, without limitation, employment, discrimination, health, safety, antitrust and securities laws. No manager has authority on behalf of the Agency to violate any law or to direct another employee to violate any law. The Agency will make every reasonable effort to provide an environment free from harassment of any kind toward any individual. A violation of these standards of conduct, whether they occur directly in the workplace or in one's personal life in a way that interferes with the integrity of the organization, may result in appropriate corrective action, up to and including termination of employment without additional warning. Staff are expected to behave responsibly at agency sponsored events that include alcohol as well as in all Agency activities.

All employees engaged in business with a governmental body or agency must know and abide by the specific rules and regulations covering relations with public agencies. Such employees must conduct themselves in a manner that avoids any dealing that might be perceived as attempts to influence public officials in the performance of their official duties.

When Homefull becomes aware of possible violations of the standards of conduct, the CEO and/or a representative from the Board of Trustees will review the violations. Based on an assessment of the facts, Homefull will then determine what response, if any, it should make. No one has the authority to retaliate against an employee who reports a possible violation in good faith.

HOMEFULL PERSONNEL POLICIES
Standards of Conduct
Dress Code

Policy:
The following information is intended to serve as a guide to help define appropriate casual business wear for all employees during normal business hours. Homefull's primary objective of a business casual dress code is to have employees project a professional image while taking advantage of relaxed clothing. Business casual dress offers an alternative to the strict business attire of dresses, suits, ties, and dress shoes. On the other hand, not all Business Casual clothing is appropriate for the office. An item that may be perfect for working in the yard, going on a picnic or playing sports aren't appropriate for the office, nor is clothing that is too revealing. Regardless of the item, it is essential to avoid wearing anything to the office that is excessively worn, frayed or wrinkled. There are times when traditional Business attire is to be worn on casual days. Take your day's schedule into account when you are dressing. If you have a meeting scheduled with visitors, or if you are advised that others in the Agency will have visitors with whom you will come in contact, you will want to dress in business attire. And, of course, business attire is always acceptable if that is your preference.

Listed below is a general overview of acceptable Business casual wear that are appropriate for the office. These items should help set the general parameters for proper casual Business wear and allow you to make intelligent judgments about items that are not specifically addressed. A good rule of thumb is that if you are not sure if something is acceptable, choose something else or inquire first.

Slacks/pants—Cotton slacks are acceptable provided they are clean and wrinkle-free. Inappropriate items include jeans of any color, other than casual dress days, sweatpants, windsuits, short shorts, Bermuda shorts, bib overalls, leggings, spandex or other form-fitting pants.

Shirts—Casual shirt, golf shirt, sweaters and turtlenecks are acceptable. Inappropriate items include tank tops, sweatshirts, shirts with large lettering, logos or slogans, halter-tops, tops with bare shoulders, and t-shirts unless worn under another blouse, shirt, jacket, or jumper.

Dresses and Skirts—Casual dresses and skirts, and split skirts at or below the knee are acceptable. Dress and skirt length should be no shorter than four inches above the knee. Mini-skirts and spaghetti-strap dresses should not be worn to the office.

Footwear—Loafers, boots, flats, dress sandals, open-toed shoes, clogs and leather deck shoes are acceptable. Athletic shoes, sneakers, thongs, flip-flops and slippers are not acceptable.

Jewelry—Should be conservative with no excessive visible body piercing.

With the prior approval of the CEO, jeans and athletic shoes are acceptable on certain days, such as leadership dress down days.

If an item of clothing is deemed to be inappropriate for the office by the employee's manager and the CEO, the employee may be sent home to change clothes and will be given a verbal warning for the first offense, and progressive disciplinary action will be taken for further dress code violations. Any questions regarding the Dress Code policy should be directed to the CEO.

Gettysburg Grocery
Grocery employees will be expected to wear plain black pants with no holes or rips, a plain black shirt in good condition, Gettysburg Grocery name tag, and a Homefull Gettysburg Grocery apron that will be issued at the start of each shift. Gettysburg Grocery employees will turn in their apron at the end of each shift when they clock out.

Grooming and Attire
Proper grooming and attire have a positive impact on the organization's image. Positions that involve frequent, direct public service contact: i.e. those where meeting the public is an inherent function of the position, and where such contact would normally occur daily, are subject to the following appearance standards: Neat and clean dress trousers and shirts, dresses, skirts and blouses, and shoes. Sneakers and gym, jogging, and tennis shoes are inappropriate except where permitted. Leggings are inappropriate except when worn under skirts or dresses.

All other employees shall maintain grooming and attire standards, which bear a reasonable relationship to their work.

Inappropriate attire is defined, but not limited to: flipflops, halter tops, shorts, midriff tops, T-shirts with offensive slogans or pictures, beach costumes, see-through or mesh clothing, and ragged, torn or dirty clothing. When an employee is found to be outside acceptable grooming and attire standards, the employee will be sent home on unpaid time. A second or subsequent deviation from acceptable grooming and attire standards will again result in the employee being sent home on lost time. Such subsequent incidents will be cause for disciplinary action. On occasion when there is approval for specified "dress down" or "casual" days, management shall determine appropriate attire standards for those days.

HOMEFULL PERSONNEL POLICIES
Standards of Conduct: Conflicts of Interest
(COA: GOV7, GOV8; CSB: A2)

Policy:

A conflict of interest may exist in any situation in which an employee is put in the position of owing a duty, a favor, or some other form of quid pro quo to someone outside the Agency or to anyone whose interests differ from those of the Agency. The creation of a conflict of interest must be avoided. Employees are obligated to disclose any time a potential or actual conflict of interest occurs.

Procedure:

- Gifts such as merchandise or products, as well as personal services or favors may not be accepted unless they are routine promotional items having a value of less than $100. Gifts of any amount may never be solicited. A gift of money may never be accepted.
- Freelancing activities must be undertaken in a manner that avoids a conflict with an employee's obligations to the Agency and does not utilize Agency time, facilities, resources, or supplies. The employee must make it clear that he or she is acting personally and not for the Agency.
- Employees who qualify for Agency services will be evaluated on consistent criteria by which other members are evaluated. Employees are still required to abide by the human resource policies set forth in this document.
- At times, Homefull may engage in collaborative relationships with other social services agencies, in terms of employment offered either on or off site. Under these circumstances, background investigations will be required as a safety precaution and this will be used as input into the decision-making process. Former clients of the Agency with satisfactory backgrounds will require a 2-year waiting period from the last point of service from the Agency to avoid role confusion with employees or other clients.
- All client referrals made to Homefull are done so through the ascribed coordinated entry process for the appropriate system or when a program is not part of a coordinated entry system, referrals are made through the required processes in an awarded grant. No payment shall be accepted in exchange for a referral and no preferential treatment shall be given to any family member or personal acquaintance of any employee, governing body member, consultant, or any oversight body.

HOMEFULL PERSONNEL POLICIES
Standards of Conduct: Sexual Harassment
(COA: ASE2; CSB: A10)

Policy:
It is Homefull's policy to maintain a work environment free of sexual harassment. As such, sexual harassment is strictly prohibited and any claims will be thoroughly and promptly investigated as required by federal and state laws. This policy applies to all Homefull employees and to all non-employees defined as agents, consultants, guests, customers, invitees, volunteers, interns, suppliers and furnishers of goods and services.

All Homefull employees, and non-employees as defined above are prohibited from harassing employees and other covered persons based on that individual's sex or gender (including pregnancy, sexual orientation, gender identity, and status as a transgender or intersex individual and regardless of the harasser's sex or gender). False accusations of sexual harassment will not be condoned. Appropriate corrective action, up to and including termination, will be taken promptly against any employee who violates this policy.

Procedure:
Defining Sexual Harassment

- Sexual harassment means any harassment based on someone's sex or gender. It includes harassment that is not sexual in nature (for example, offensive remarks about an individual's sex or gender), as well as any unwanted or unwelcomed sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when any of the following is true:

  (1) submission to such advance, request, or conduct is made either explicitly or implicitly a term or condition of an individual's employment,

  (2) submission to or rejection of such advance, request, or conduct by an individual is used as a basis for employment decisions affecting such individual, or

  (3) such advance, request, or conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment.

- Homefull will not tolerate any form of sexual harassment, regardless of whether it is:
  - Verbal (for example, epithets, derogatory statements, slurs, sexually related comments or jokes, unwelcome advances, requests for sexual favors, statements or threats that imply a link or could be reasonably construed to imply a link between an employee's sexual conduct and his or her employment status, advancement potential, salary treatment or other employment action).

  - Physical (for example, assault or inappropriate physical contact).
  - Visual (for example, displaying sexually suggestive posters, cartoons, or drawings, sending inappropriate adult-themed gifts, leering, or making sexual gestures).
  - Online (for example, derogatory statements sexually related comments, unwelcome sexual advances, requests for sexual favors, or sexually suggestive postings in any social media platform including Facebook, Twitter, Instagram, Snapchat, etc.).
- This list is illustrative only and not exhaustive. No form of sexual harassment will be tolerated.
- Harassment is prohibited both at the workplace (including while teleworking) and at employer-sponsored events.
- No manager will engage in or condone any act of sexual harassment. Managers will be held to a higher standard of conduct particularly in relation to non-management employees or subordinates.
- Sexual harassment by non-employees is prohibited. Employees may, without fear of reprisal, refuse to work with a non-employee who fails to refrain from sexual harassment.

Reporting and Investigating the Claim

- Homefull's policy is to investigate thoroughly and remedy any known incidents of sexual harassment. To accomplish this, however, employees must bring incidents of sexual harassment to the attention of human resources and/or management. Accordingly, employees are expected to report incidents of sexual harassment as soon as possible after occurrence to human resources, their manager, another manager in the Agency, or the CEO.
- If the employee's manager is involved in the incident, the report should be made directly to human resources, another manager in the Agency, or the CEO.
- The CEO will meet with the employee to obtain a written statement of the incident. If the CEO is involved in the allegation or if there is a question on his or her objectivity, a human resources staff member or an independent consultant will be engaged to facilitate the investigation.
- The identity of the employee submitting the complaint or those named by the complainant shall be held in confidence to the fullest extent possible. However, the Agency has a responsibility to investigate charges of harassment, and such investigation will include interviewing the individual charged and any witnesses.
- Upon completion of the investigation, the Agency will promptly advise the affected employee(s) of the results of the investigation.
- If the allegation of sexual harassment is unsubstantiated, the matter will be closed and no corrective action will be taken against the alleged harasser or the complainant unless untrue statements of fact were made by the complainant.
- If an employee has been found to have committed an act of sexual harassment, a record of the violation will be placed in the employee's personnel file. In addition, the employee will be subject to corrective action, up to and including termination. The corrective action taken will depend upon: (a) the severity of the conduct; (b) whether or not it is the first offense; (c) the employee's total disciplinary record; and (d) what actions best punish the offender and yet protect the victim from future harassment. The employee may be required to participate in appropriate counseling or training as part of the corrective action process.

- Any non-employee who has been found to have committed an act of sexual harassment will be requested to leave the Agency premises and the Agency may terminate any contract or lease which establishes the legal relationship between the individual and the Agency.
- No employee will be subject to any form of discipline, reprisal, intimidation, or retaliation for having filed a complaint of sexual harassment or for cooperating in the investigation of a complaint in good faith.
- Employees and non-employees shall not knowingly provide or make untrue statements of fact regarding a complaint of sexual harassment or during the investigation of a complaint.

Educating Employees

Homefull provides education about sexual harassment as part of its employee orientation program to ensure that each employee is aware of the standard of personal conduct expected of Agency employees. Each manager is expected to communicate Homefull's policy against sexual harassment to his/her employees and to encourage them to report any violations. Homefull also provides a mandatory sexual harassment refresher training for all staff. All staff are required to attend this training annually.

HOMEFULL PERSONNEL POLICIES
Standards of Conduct: Substance Abuse
(CSB: A5)

Policy:
The use of alcohol, marijuana (other than medically prescribed), and/or illegal drugs while at work or the sale, distribution, or possession of illegal drugs is strictly prohibited. In addition, no employee shall report to work or be at work impaired by alcohol or other drugs, including CBD, THC, or other marijuana derivatives. Violators are subject to corrective action, up to and including termination and/or criminal prosecution.

Procedure:
- Employees using prescribed medications or over-the-counter preparations that affect performance or safety should report such use to their manager. This includes any marijuana prescription that might interfere with functioning.
- Homefull may take reasonable actions to determine fitness for duty including observing behavior and performance and use of examinations and/or laboratory tests to measure for the presence of alcohol or drugs. Any employee who refuses to submit to testing, or who fails the test, is subject to corrective action, up to and including termination. Employment may be temporarily suspended until the investigation is concluded.
- One or more of the following identifiable signs can establish in the mind of an observer that the employee may be impaired. This list is not intended to be all inclusive.

    - Inability to perform work
    - Major unexpected changes in behavior
    - Increased tardiness or absenteeism
    - Red or glassy eyes
    - Dilated or constricted pupils
    - Breath odor
    - Slurred speech
    - Uncoordinated walking
    - Hyperactivity
    - Blank stare

- Homefull reserves the right to utilize random drug and alcohol testing.

HOMEFULL PERSONNEL POLICIES
Safety and Loss Reduction Practices in Gettysburg Grocery

***Policy*:**
It is the policy of Homefull and the Gettysburg Grocery to reduce loss within the store internally.

Procedure:
The following practices will be utilized to reduce potential loss from employee theft and to ensure proper checks and balances of store operations.

- GG's employees shall use staffed checkout lanes when purchasing items during/before/after their shifts; use of self-checkout is not allowed.
- At the end of each shift, each employee who leaves work with any bags will have them checked by security.
- Price adjustments are only completed by Managers.

If any employee witnesses or becomes aware of theft in the store, whether by customers or other employees, it is expected that they will report that to a Manager or to HR.

HOMEFULL PERSONNEL POLICIES
Standards of Conduct: Concealed Carry
(COA: ASE1, ASE5; CSB: A6)

Policy:
Homefull is committed to providing its employees a work environment that is safe and secure and to providing a safe and secure service environment for clients. This commitment includes prohibiting employees from possessing or having under their control a weapon. As an accredited organization, Homefull is committed to the Administrative and Service Environment standard that states: "In its daily operations, the organization ensures the health and safety of its personnel and the individuals and families it serves."

Weapons inside the workplace pose a potential threat to the safety and security of our employees, volunteers and clients; firearms of any type are strictly prohibited at all times inside Homefull program sites, or while you are engaged in the work of the agency of Homefull, whether on-site or off-site. The carrying of a firearm of any kind while inside a Homefull owned property, program sites, or leased space, inside a company-owned vehicle or transporting a Homefull client in your personal vehicle, or while conducting Homefull business, on or off-site, is considered a violation of this policy and of the COA standard related to health and safety.

It is the policy of Homefull that notices are posted at all program sites stating that weapons are not allowed on the premises. Employees who violate this policy will be subject to disciplinary actions, up to and including employment termination.

Procedure:
Regardless of whether an employee possesses a concealed weapons permit (CCW) weapons are prohibited on any Homefull property. Individuals covered by this policy who have been issued a permit to carry a concealed weapon in the State of Ohio are not exempt from the above provisions. Individuals covered by this policy who carry or possess a weapon must store the weapon in accordance with the law prior to entering an area in which a weapon is prohibited. The weapon and/or ammunition must remain inside the person's privately-owned motor vehicle while the person is physically present inside the motor vehicle while on agency business, or the weapon and/or ammunition must be locked in the trunk, glove box, or other enclosed compartment or container within or on the person's privately-owned motor vehicle while on property owned or leased by Homefull. However, if the employee's personal vehicle is used to transport clients, the vehicle then becomes Homefull workspace and the no weapons policy applies. Any employee who stores a weapon in their vehicle (that is not used for transporting Homefull clients) is required to complete a Disclosure of Firearm Possession Statement that will be reviewed by Homefull's Health & Safety Manager and maintained in the employee's personnel record. This form is included in the Appendix.

All Homefull employees are trained in a crisis intervention model and some staff have had training related to responding to a violent intruder.

HOMEFULL PERSONNEL POLICIES
Work Environment: No Solicitation

Policy:
Solicitations by Homefull employees for funds, memberships, or individual commitments to outside organizations or causes and the sale and distribution by employees of materials for any purpose are not permitted in work areas during working hours without management approval. This does not apply to charitable activities that have been approved in advance by the Agency. Individuals who are not Agency employees may not distribute any literature or conduct any solicitation on Agency premises at any time without prior management approval.

Procedure:
Anyone who does not have a valid reason for being on Agency premises should be reported immediately to the CEO. The CEO must approve all posted material for Agency lobby and bulletin boards. Employees with concerns about solicitation should bring the concern to their supervisor or, if it relates to the supervisor, to human resources personnel.

HOMEFULL PERSONNEL POLICIES
Homefull Solutions Employees & Dual Roles

Policy:
The Homefull Solutions business line was created specifically to provide employment opportunities to clients and former clients. This social enterprise division of Homefull seeks to increase housing stability through income stability. The combination of client role and employee role can be difficult to navigate and it is recognized by Homefull that supporting clients to maintain employment is as important as assisting clients in obtaining employment.

Procedure:
When a current or former client is hired for employment with Homefull Solutions, he/she will be assigned a Homefull Case Manager (as part of community based support services) if not already assigned as part of their housing support work. Homefull Solutions employees will be expected to check in with their Case Manager at a minimum of once a month and are allowed to use work time for this Case Management appointment once a month.

The assigned Case Manager will create an HMIS Entry for Homefull Solutions and will record case notes and case plans per the typical client record.

If a Homefull Solutions employee already has a Case Manager when hired, he/she can continue with that Case Manager rather than being assigned a new one.

When a Homefull Solutions employee is in need of services that would typically be classified as client support (services perspective) or client assistance (for budget perspective), this need would be handled by the assigned Case Manager and Program Manager. If a supervisor of the employee (and/or HR staff) determines there is an issue that may be interfering with the person completing their job responsibilities, supervisor/HR will refer to the Case Manager/Program Manager to support the employee as a client. In this way, the employee's "client support" needs will be addressed in a method separate from their role as an employee. Homefull Solutions employees will retain eligibility for Client Assistance via their role as a client. Examples *may* include, but are not automatic or are not limited to, working on obtaining driver's license, addressing housing stability issues, or identifying child care resources.

HOMEFULL PERSONNEL POLICIES

Personnel Files

(COA: HR5, HR7, RPM1)

Policy:

Homefull will maintain employee records that pertain to the employee's application for employment, job changes, compensation, benefits, performance appraisals, performance management, and separation of employment as well as personal data as needed for employment. It is the employee's responsibility to inform the HR department of any changes to personal and contact information. All employee records policies apply to independent contractors, volunteers, and interns.

Procedure:

Personnel records are maintained in our online database/payroll system, with former employee records prior to the electronic transition being maintained in a locked cabinet. In accordance with the provisions of the Privacy Act of 1974, the Agency will release information contained in personnel files to authorized users only on a "need to know" basis. Without the written consent of the individual, information about applicants or employees' former employers will not be released in individually identifiable form except when the request involves the following:

1. Concerns "directory information," such as confirmation of employment, position, current salary, and dates of employment.
2. Involves a request by a law enforcement authority for dates of attendance and home address.
3. Is aimed at protecting the "legal interests" of the agency.
4. Is pursuant to federal, state, or local law.
5. Is in response to a medical emergency.

The personnel file on each employee shall contain, but not be limited to, the following:

- Resume for all service providers and service supervisors
- Form I-9, verification of citizenship and employment eligibility
- Verification or copies of credentials and/or degrees of service providers
- Job description
- Documentation of employee reference check for service providers
- Annual performance evaluation
- Documentation to reflect that the employee has either received a copy of the personnel policies and procedures or has had them explained
- Documentation of employee orientation
- Documentation to reflect that the employee has received a copy of the Client Abuse and Staff Neglect Policies, Client Rights Policies, and Client Grievance Procedures
- Documentation of Continuing Education (if applicable)
- Salary or pay rate information
- Disciplinary actions

Personnel files will be stored for seven years following the employee's separation unless otherwise required by federal, state, or local law or regulatory agency. An employee may review and receive a copy of his/her personnel record upon request to his/her supervisor.

HOMEFULL PERSONNEL POLICIES
Employee Classifications

Policy:
Employees are classified according to the federal Fair Labor Standards Act for exempt and non-exempt status and according to the Homefull classifications by number of hours worked and term of employment. Homefull will have six classifications: Full-time, part-time, introductory, temporary, casual, and students. These classifications include exempt, non-exempt, and temporary employees in accordance with the Fair Labor Standards Act and applicable state laws.

Employment at Homefull is non-contractual, for no fixed period and terminable at any time by either party. The employee is free to end the relationship at any time, for any reason, and the Agency reserves the same right.

Procedure:
Pursuant to the Fair Labor Standards Act, employees earning less than $35,568 will be classified as non-exempt. Non-exempt employees will be paid overtime for hours worked that exceed 40 in a workweek.

1. Full-time
    - Regularly scheduled to work 32-40 hours per week.
    - Not in a temporary or introductory status.
    - Eligible for benefit plans.
    - Employees who have accepted a different position within Homefull will be subject to a performance evaluation after a probationary period of 90 days. If a salary adjustment is made, it will be effective at the 90-day mark.
2. Part-time
    - Regularly scheduled to work less than 32 hours per week.
    - Not in a temporary or introductory status.
    - Not eligible for benefit plans.
3. Introductory
    - New hires to the Agency whose performances are being evaluated for a probationary period of 90 days.
    - Employees who satisfactorily complete the introductory period will be notified of their new employment classification.
    - Not eligible for benefit plans.
4. Temporary
    - Hired to temporarily supplement the workforce in a limited duration.
    - Regularly scheduled to work part time or full-time hours.
    - Not eligible for benefit plans.
5. Casual
    - No regularly scheduled hours per week.

- Hired on an as-needed basis for very specific reasons.
- Not eligible for benefit plans.

6. Students
   - Internship for hands-on practical experience under the guidance of a Licensed Social Worker or Federal Work Study program through a college or university.
   - Non-paid assignments, usually one semester in length.
   - Not eligible for benefit plans.
7. Minors
   - Hired for working in Gettysburg Grocery only.
   - Required to follow all state laws for employing minors including obtaining a work permit prior to hire.
   - Not eligible for benefit plans.
   - See policy re: Employing Minors for more information.

Non-employee classifications:

AmeriCorps - Placed on an annual basis as part of a service program to perform assigned duties. The Agency provides training, office space, and administrative support.

Collaborative relationships - At times the Agency may engage in collaborative relationships with other social service agencies in terms of employment offered either on or off site. As host, the agency provides office space, administrative support and general direction. As guest, the Agency provides direct supervision.

Volunteers - Individuals volunteering their time to assist with the daily operations of the Agency. Granted upon availability and need.

Under these circumstances, background investigations will be required as a safety precaution and this will be used as input into the decision-making process. Former clients of the Agency with satisfactory backgrounds will require a 2-year waiting period from the last point of service to avoid role confusion with Agency employees or other clients and to establish clear boundaries.

HOMEFULL PERSONNEL POLICIES
Workforce Hiring & Recruiting: Employing Minors
(COA: HR2, HR3, RPM1)

Policy:

Consistent with other Homefull employment practices, Homefull will seek a diversified workforce and will follow all practices that are consistent with all federal, state, and local regulations when considering employing minors. Minors are exclusively hired only for Homefull's grocery operations.

Procedure:
As part of Homefull's operations of the Gettysburg Grocery, Homefull will consider candidates that are minors, limited to 16 and 17 year olds. Consistent with other applicants, Homefull will utilize a 3rd party vendor for recruiting and interviewing steps and for screenings (background checks and drug tests).

In addition to the traditional steps for hiring new employees as outlined in the previous policy, Homefull will ensure the following:

1. A requisition will be completed and the necessary duties will be determined prior to the search.
2. Homefull will ensure any minor candidates have applied for a working permit.
3. Per Ohio Department of Commerce Minor Labor Laws, Homefull will:
    a. Agree to wage/compensation via an offer letter ahead of the onset of employment;
    b. Ensure a 30-minute rest period is provided if a shift is in excess of 5 hours;
    c. Maintain a list of minors employed by Homefull and post it in a conspicuous place;
    d. For 2 years, maintain time records of start and stop times, including rest periods;
    e. Not schedule 16 or 17 year olds to work prior to 7am on a day that school is in session;
    f. Not schedule 16 or 17 year olds after 11pm on a night preceding a school day;
    g. Not allow minors to work in any listed prohibited occupation.

Developing a Multicultural Community & Furthering Homefull's Mission
To facilitate Homefull's goal of increasing a multicultural presence, programs should make efforts to locate minority applicants for openings as well as recruit within Homefull programs to encourage client employment. For hiring minors, Homefull will pay particular attention to hiring from the local community to assist with commute challenges.

Confidential Screening
See previous policy regarding confidential screening of all Homefull candidates.

HOMEFULL PERSONNEL POLICIES
New Hire Probation Period

***Policy*:**
Upon new hire, all employees enter a 90 day probationary period in which performance is evaluated. The end of the probation period will include a 90 day performance evaluation.

Procedure:
During the first 90 days of employment, employees are classified as introductory. This introductory period allows the new employee to determine if the position is a good fit for themselves and for the agency to determine if the new employee's performance fits the agency culture and meets the needs of the program setting.

During the probationary period, specific behaviors and performance issues may be grounds for termination. Examples of poor/unsatisfactory behaviors include excessive absence, poor case audits or chart reviews, or inappropriate conduct that violates Homefull's Code of Conduct. Near the end of the 90 day probation period, the employee's supervisor will conduct a performance evaluation to provide feedback to the employee on their performance as well as to provide feedback to the agency on the training period. The end of the 90 day probationary period will also include a competency test with which to measure changes from the new hire competency test given during orientation. Additionally, full time employees will become benefits eligible immediately following the end of the 90 day probationary period.

New employees that are rehires or join the team due to a merger or acquisition of another organization will have special exceptions to benefits eligibility waiting periods per each carrier's rules. Where possible, waiting periods will be waived for initiating eligibility for insurances. PTO will remain a 90 day eligibility waiting period.

HOMEFULL PERSONNEL POLICIES
Work Schedule
(CSB: A12)

Policy:
Individual work schedules depend upon the employee's classification and position within the Agency, as well as the employee's specific work site. Staffing needs and operational demands may require variations in hours scheduled. Flexible scheduling may be available in some cases.

Procedure:
Normal operating hours for the Agency's key program sites are as follows:

- Administration
  Monday-Friday, 9:00am-5:00pm
- Housing First PSH sites
  Every day, 24 hours
- Iowa Avenue and Ohio Commons Supportive Housing
  Every day, 24 hours
- River Commons Supportive Housing
  Every day, 24 hours
- Apple Gateway Services for Women and Families
  Monday-Friday, 8:00am-5:00pm
- Gettysburg Gateway Services for Men
  Monday-Friday, 7:00am-7:00pm
- Prevention & Community Based Service Programs
  Monday-Friday, 9:00am-5:00pm
- Family Living Center
  Every day, 24 hours
- Columbus Main Office & Community Based Services
  Monday-Friday, 9:00am-5:00pm
- Mediterranean PSH
  Monday-Friday, 9:00am-5:00pm

Employees should contact their direct supervisor to request flexible scheduling per Homefull's quarterly schedule request process. Issues such as staffing needs, nature of the job, and the employee's performance will be taken into consideration. Performance improvement plans for employees on a Corrective Action will include that they resume a traditional Mon-Fri/9-5 work schedule to coincide

with supervisory staff if they have an alternative schedule in place. Work in the office when not in the community will be required.

HOMEFULL PERSONNEL POLICIES
Employee Attendance
(CSB: A12)

Policy:
Homefull offers a variety of work schedules. Some jobs require exact adherence to specific work schedules, specifically shift workers, while others offer a greater degree of flexibility based on program/site needs and responsibilities. It is the employee's responsibility to know the schedule requirements of his or her job and adhere to those requirements. Attendance and punctuality are important to the efficient operation of Homefull and are a way to show courtesy and respect to co-workers and clients/customers. Regular attendance is expected and repeated failure to meet the attendance and punctuality standards may result in corrective action and could lead to termination of employment.

Procedure:
Homefull expects all employees to conduct themselves in a professional manner during their employment. This includes practicing good attendance habits. All employees should regard coming to work as scheduled, and leaving at the scheduled time as essential functions of their jobs. It is expected that Homefull employees follow procedure for informing appropriate staff of expected or unexpected absences.

All staff who work off-site from an office/program location for any portion of their day (e.g. community-based Case Managers, Inspectors, or Housers) must check in with their Supervisor at the end of their day to confirm safety, location, and that the employee is clocking out. If in an office/program site where a Supervisor is physically present, the employee can visually confirm departure for the day.

Expectations

1. **Scheduled Shifts**
    - Employees are expected to report to work on time and prepared to begin duties at the start of their scheduled shift.
    - Schedules will be posted in advance, and employees are responsible for checking their schedules regularly.
2. **Punctuality**
    - Employees must arrive and be ready to work at their scheduled start time.
    - Tardiness is defined as arriving **more than 5 minutes late** without prior supervisor approval.
3. **Absences**
    - Any absence must be reported as soon as possible, but **no later than 2 hours before the start of the scheduled shift**.

- Employees must notify their direct supervisor or designated manager by phone call or other approved method.
- Texting a coworker is not considered proper notification.

Unscheduled Absences and Tardiness

- **Tardiness** (late arrival, early departure, or extended break without approval) will be documented.
- **No-Call/No-Show** (failing to report for a scheduled shift without notifying a supervisor) is a serious violation and may result in immediate disciplinary action, up to and including termination.
- Excessive absenteeism or tardiness, even if reported, will be subject to progressive discipline.

Excessive absenteeism:

- Defined as a pattern of unplanned or unscheduled time lost from scheduled work.
- In order for an absence to be considered scheduled time off, notification must be made to the employee's manager *at least two weeks in advance*.
- In cases of unplanned/unscheduled absence, employees are expected to contact the On Call number as soon as possible and prior to the beginning of their work shift.
- 3 occurrences of unplanned/unscheduled absences within a 2 week period OR 5 within a month are considered 'excessive'
- Unscheduled absence that extends for 2 or more days without proper notification (aka No Call No Show) will be considered voluntary job abandonment/voluntary termination.
- ~~When absence exceeds one day, but the days are consecutive, the total time off is considered as one occurrence.~~
- If an absence pattern emerges within an employee's first month, termination will be considered.

Chronic Tardiness is defined as the failure of an employee to begin work at the scheduled time for 2 or more times in a week OR more than 5 times in a month. If a tardiness pattern emerges within an employee's first month of employment, termination will be considered.

Absenteeism and tardiness are mutually exclusive however when they occur together they show a pattern of irresponsibility for one's schedule and could be counted together for addressing corrective actions or other disciplinary action.

In general, corrective action begins with the fifth occurrence of *unscheduled absenteeism* or *tardiness* within any consecutive 12-month period. When the number of occurrences is greater than five, any additional occurrences may result in further corrective action, up to and including termination.

Progressive Discipline for Attendance

Attendance issues (excessive absenteeism or chronic tardiness as defined above) will be addressed consistently and fairly using the following system (~~over a rolling 12-month period):~~

- **1st occurrence**: written warning
- **2nd occurrence**: termination

"Proper notice" means that you call the On Call number (or supervisor based on your position) prior to the start of your shift and personally notify your supervisor or another member of management about the problem, unless a verifiable emergency makes it impossible for you to do so. It is not sufficient to call in and leave a message with a coworker or someone else who is not in a management position. All managers have been advised to make themselves available to take calls such as these, so there should be no reason to worry that you will not be able to reach an appropriate person to advise of your attendance problem. If you fail to give proper notice of attendance problems in advance as explained in this policy, you may be subject to disciplinary action, up to and possibly including discharge.

If you are *absent without notice* for two days in a row, you will be considered as having abandoned your job, and Homefull will process your work separation as a voluntary resignation on your part.

Exceptions

- Legally protected absences (e.g., FMLA, jury duty, military leave, sick leave as required by state/local law) will not count against attendance records.
- Emergency situations will be reviewed on a case-by-case basis.

HOMEFULL PERSONNEL POLICIES
General Telecommuting Policy
(COA: PRG4)

Policy:
Telecommuting gives employees the opportunity to work away from a Homefull site. Homefull considers telecommuting to be a flexible work option when an employee's position allows them the ability to work outside of the office. This means that some positions may be appropriate for this arrangement, while others are not. Telecommuting is decided on a case-by-case basis and in no way changes the terms and conditions of employment. Please refer to the COVID Policies and Procedures section of the appendix for information regarding telecommuting during COVID.

Procedure:
Telecommuting can be for a designated or extended period of time. Any telecommuting arrangement can be discontinued at will and at any time at the request of either the employee or Homefull. When possible, Homefull will give 30 days' notice of any change to assist in accommodating commuting and other issues that may arise from the termination of a telecommuting arrangement.

Eligibility and Expectations
Homefull always strives to provide equal opportunities to all employees when it comes to working situations. However, remote work is not conducive to every employee and position. For example, some programs require staff to provide services in-person. In these situations, an employee will not be able to telecommute. However, other positions may be predominantly computer-based and can transition easily to telecommuting. Examples of positions that can be done remotely include, but are not limited to:

- Chief Officer positions
- Director of Diversity, Equity, & Inclusion
- Development Director
- Special Projects Manager
- Financial Associate
- Grants Administrator
- HR Generalist
- HR Director
- Director of Dayton Division
- Health & Safety Manager
- Director of Columbus Division
- Quality Compliance Director
- Clinical Director
- Housing Administrator
- IT Support Associate

Before entering into any telecommuting agreement, the employee, supervisor, and a Homefull Chief or HR representative, will evaluate the suitability of such an arrangement, reviewing the following areas:

- Employee suitability. The employee, supervisor, and a Homefull Chief or HR representative will assess the needs and work habits of the employee. Factors that will be considered when determining the employee's suitability will include, but are not limited to, the employee's past performance, evaluations, and any other factors that would suggest the employee can thrive in a telecommuting environment.
- Employee status. Only permanent, full-time employees will be approved for telecommuting, unless an employee is originally hired in a permanent telecommuting position. Employees who are still in their introductory 90-day probationary period have not developed all the skills required to work in the more independent environment telecommuting requires.
- Job responsibilities. The employee, supervisor, and a Homefull Chief or HR representative will discuss the job responsibilities and determine if the job is appropriate for a telecommuting arrangement.
- Equipment needs, workspace design considerations and scheduling issues. The employee, supervisor, and a Homefull Chief or HR representative will review the physical workspace needs and the appropriate location for the telework.
- Tax and other legal implications. The employee must determine any tax or legal implications under IRS, state and local government laws, and/or restrictions of working out of a home-based office. Responsibility for fulfilling all obligations in this area rests solely with the employee.

The telecommuting employee will be expected to:

- Be transparent about availability and keep their calendar and availability status up to date, indicating when they are online or offline;
- Maintain strong communication by conducting regular check-ins with their manager and co-workers;
- Utilize their webcam and phone instead of email as often as possible;
- Request PTO when they intend to be away from their work;
- Set up a dedicated workspace that allows them the most focus as possible;
- Prepare a childcare strategy if needed. Telecommuting is not designed to be a replacement for childcare. Although an employee's schedule may be modified to accommodate childcare needs, the focus of the arrangement must remain on job performance and meeting business demands.

Expenses

Working primarily at home could result in expenses not directly addressed by this policy. If such expenses are necessary for their official duties as prescribed, Homefull will reimburse the employees. However, since reimbursement is subject to management approval and is not guaranteed, potential expenditures should always be approved prior to the transaction being made.

Equipment

On a case-by-case basis, Homefull will determine the appropriate equipment needs for each telecommuting arrangement. Homefull telecommuting employees are held to the same standard as on-site employees as it relates to tech equipment usage. Please refer to Homefull's Tech Equipment Usage Policy for more information. The employee will establish an appropriate work environment within his

or her home for work purposes. Homefull will not be responsible for costs associated with the setup of the employee's home office, such as remodeling, furniture or lighting, nor for repairs or modifications to the home office space.

Client Interactions via Telehealth
With prior approval, client interaction including case management appointment, diagnostic assessments, and diagnostic assessment updates, may be completed via telehealth. Homefull will utilize a secure platform recommended and vetted by Homefull IT. The Homefull staff will maintain a confidential workspace, free from interruption or distraction. The client will be provided with a Homefull device to complete the appointment. The client can decline use of Homefull device and utilize their own technology.

Prior to starting the appointment, Homefull staff will explain the purpose of the appointment and risks of completing via telehealth. Client must consent prior to the appointment. Consent will be documented by Homefull staff. Homefull staff will verify client's identity by confirming name, DOB, and address. If client declines, in-person options will be provided and will not impact client's services or care from Homefull.

Security and Confidentiality
Telecommuting employees will be expected to ensure the protection of proprietary company and client information accessible from their home office. Steps include the use of locked file cabinets and desks, regular password maintenance, and any other measures appropriate for the job and the environment. Confidentially must be maintained at all times.

Safety
Employees are expected to maintain their home workspace in a safe manner, free from safety hazards. Injuries sustained by the employee in a home office location and in conjunction with his or her regular work duties are normally covered by the company's workers' compensation policy. Telecommuting employees are responsible for notifying the employer of such injuries as soon as possible. The employee is liable for any injuries sustained by visitors to his or her home worksite.

Ad Hoc Arrangements
Temporary telecommuting arrangements may be approved for circumstances such as inclement weather, special projects, emergency situations, and business travel. These arrangements are approved on an as-needed basis only, with no expectation of ongoing continuance. Other informal, short-term arrangements may be made for employees on family or medical leave to the extent practical for the employee and the organization and with the consent of the employee's health care provider, if appropriate. All informal telecommuting arrangements are made on a case-by-case basis, focusing first on the business needs of the organization. The same factors that are considered when reviewing telecommuting for a designated or extended period of time will also be considered when determining whether an ad hoc telecommuting arrangement is appropriate.

HOMEFULL PERSONNEL POLICIES
Telecommuting Policy/COVID-19
(COA: ASE6, ASE7, PRG4, RPM1)

Policy:
Telecommuting gives employees the opportunity to work away from a Homefull site. This policy applies to all Homefull employees authorized to temporarily work remotely during the COVID pandemic. Telecommuting is decided on a case by case basis. The decision is based on whether an employee's position allows them the ability to work outside of the office and will be decided in compliance with public health guidance for contagious diseases. Please refer to the General Telecommuting Policy for information regarding telecommuting for all other purposes.

Procedure:
Telecommuting during the pandemic is intended to be temporary. Any telecommuting arrangement can be added or discontinued at will and at any time per Homefull leadership and in accordance with public health guidance.

Criteria for Selection

Homefull always strives to provide equal opportunities to all employees when it comes to working situations. However, remote work is not conducive to every employee and position. Before entering into any telecommuting agreement a Homefull Chief will evaluate the suitability of such an arrangement, reviewing the following areas of the position:

- Can the duties of the position be successfully fulfilled through telecommuting? Criteria include:
    - Measurable work activities
    - Need for face-to-face interaction with co-workers
    - Clearly established goals and objectives
    - Duties that can be performed alone
    - Equipment needs that are limited and can be easily stored at the off-site location

Responsibilities
Position requirements and responsibilities will not change due to telecommuting. Workers face the same expectations in relation to professionalism, work output and client service, regardless of where the work is being performed. The amount of time an employee is expected to work in a given week will not change, although the exact scheduling of allotted hours will be left up to the discretion of their direct supervisor(s). If an employee's physical presence is required at Homefull's primary work location, he or she may be expected to report once given adequate notice.

The telecommuting employee will be expected to:

- Be transparent about availability and keep their calendar and availability status up to date, indicating when they are online or offline.
- Maintain strong communication by conducting regular check-ins with their manager and co-

workers.
- Utilize their webcam and phone instead of email as often as possible.
- Request PTO when they intend to be away from their work.
- Set up a dedicated workspace that allows them the most focus as possible.
- Prepare a child care strategy if needed. Telecommuting is not designed to be a replacement for appropriate child care. Although an individual employee's schedule may be modified to accommodate child care needs, the focus of the arrangement must remain on job performance and meeting business demands.

Expenses
Working primarily at home could result in expenses not directly addressed by this policy. If such expenses are necessary for their official duties as prescribed, Homefull will reimburse the employees. However, since reimbursement is subject to management approval and is not guaranteed, potential expenditures should always be approved prior to the transaction being made.

Equipment
On a case-by-case basis, Homefull will determine the appropriate equipment needs for each telecommuting arrangement. Homefull telecommuting employees are held to the same standard as on-site employees as it relates to tech equipment usage. Please refer to Homefull's Tech Equipment Usage Policy for more information.

The employee will establish an appropriate work environment within his or her home for work purposes. Homefull will not be responsible for costs associated with the setup of the employee's home office, such as remodeling, furniture or lighting, nor for repairs or modifications to the home office space.

Security and Confidentiality
Telecommuting employees will be expected to ensure the protection of proprietary company and client information accessible from their home office. Steps include the use of locked file cabinets and desks, regular password maintenance, and any other measures appropriate for the job and the environment. Confidentially must be maintained at all times.

HOMEFULL PERSONNEL POLICIES
Benefits: Medical, Life, Disability, Retirement Plan
(CSB: A12)

Homefull offers a comprehensive health insurance plan to full time employees who have completed their 90-day introductory period. Employees may elect to enroll themselves and qualified family members. Homefull subsidizes a percentage of the premium for single and dependent coverage. Further information on cost, coverage descriptions, applicable deductibles, co-insurance, co-payments, and/or maximums is provided in the enrollment materials.

Homefull provides Basic Life Insurance and Accidental Death and Dismemberment Insurance in the amount of $25,000 per employee. Homefull pays the full cost of this policy. Refer to the enrollment materials for plan benefits, policies and limitations. Voluntary life insurance is also available at a group rate for employees and qualified dependents, with the full cost of this being the employee's.

Homefull also provides short & long term disability insurance at no cost to the employee and is a benefit available after an employee completes their 90 day probation. Please refer to the enrollment materials for plan benefits, policies and limitations. Please note that an employee on short or long term disability will not accrue vacation or sick days during the period that he or she is off work.

Eligible employees are provided the opportunity to enroll in an Homefull's retirement plan. Eligibility for the retirement plan is one year of employment. Should an employee choose to participate, Homefull, at its discretion, may **match** a certain percentage of the employee's annual salary.

EMPLOYEE RETIREMENT INCOME SECURITY ACT (ERISA)

As a participant in your Employer's benefit plans, you are entitled to certain rights and protection. ERISA provides that all participants shall be entitled to:

1. Examine, without charge, at the plan administrator's office and at other specified locations, all plan documents, including insurance contracts and copies of all documents filed by the plan with the U.S. Department of Labor, such as detailed annual reports and plan descriptions.
2. Obtain copies of all plan documents and other plan information upon written request to the plan administrator. The administrator may make a reasonable charge for the copies.
3. Receive a summary of the plan's annual financial report. The plan administrator is required by law to furnish each participant with a copy of this summary annual report.
4. Receive notice of our decision, and to have this decision reviewed if you disagree with it in any respect by submitting your issues and comments to us in writing. ERISA governs the procedure under which you may appeal our claims decision. ERISA also provides certain limits upon the actions that are available to challenge that claims decision.

If you have any questions about your plan, you should review the Summary Plan Description for further information concerning your rights. Your plan administrator is required to furnish the Summary Plan Description to you. If your question is not resolved by reviewing the Summary Plan Description, you should then contact the plan administrator.

Plan Modification, Amendment and Termination

The employer has the right to amend or terminate the Plan at any future time. No consent of any participant is required to terminate, modify, amend or change the Plan. Your individual coverage terminates (a) when you leave your employment, (b) when you are no longer eligible, (c) if the plan is contributory, when you cease to contribute, or (d) when the plan terminates, whichever happens first.

HOMEFULL PERSONNEL POLICIES
Benefits: Medical

***Policy*:**
Homefull offers a comprehensive health insurance plan(s) to benefit eligible employees. Employees may elect to enroll themselves and qualified dependents in the plan(s).

The Agency subsidizes a percentage of the Medical and Dental premiums for single and family coverage. Vision coverage premiums are 100% employee paid with no employer subsidization. Employees should refer to Homefull's annual enrollment documentation for the cost, coverage descriptions, applicable deductibles, co-insurance, co-payments, and/or applicable maximums.

Employees are eligible to enroll in the Agency's offered plan(s) at the following times:

- New hire – after completion of 90 days' employment
- Upon rehire based on time away from Homefull (subject to carrier rules)
- Upon hire for merger/acquisition situations (subject to carrier rules)
- Annual open enrollment
- Qualifying life event

Employees must enroll in their benefits within 30 days of their qualifying life event or completion of 90 days' employment.

Employees who enroll dependents in the plan(s) will be required to provide eligibility documentation at the time of enrollment. Verification of these documents will be processed by a third party vendor with whom Homefull has contracted. All documentation will be verified to have been destroyed once verification has been completed.

Upon termination, since medical insurance is active until the last day of the final month of employment, an employee will be responsible for the full cost of their medical insurance rather than the employer/employee split if their last day falls prior to the 15th of the month. This full cost will be deducted from their final pay.

DEFINITIONS:

Benefit Eligible: After 90 days of employment (with exceptions as stated above)

Qualified Dependent: Legally married spouse, natural child or legally adopted child, Stepchild, Child with whom you have legal guardianship and child who is subject of a Qualified Medical Child Support Order (QMCSO)

Qualifying Life Event: Status changes that qualify an employee to make benefit elections. See Below:

- Birth or adoption of a child

- Marriage, divorce, death of a spouse, legal separation and annulment
- A change in the number of dependents, including birth, death, adoption and placement for adoption
- Benefit eligibility status change
- Court ordered coverage
- Change in coverage of a spouse or dependent under another employer's plan
- A dependent ceasing to satisfy eligibility requirements for coverage due to attainment of age, student status, marital status, or other similar circumstances
- Entitlement to Medicare or Medicaid

Dependent/Spouse Required documentation

To Enroll a Spouse:

1. A copy of Marriage Certificate, spouse social security number ***and*** **1** of the following documents;
    a. Copy of the first page of the most recently filed Federal Income Tax Return (black out the financial information) note: if spouse files married separately also submit first page of spouse's tax return from the same year being provided. OR
    b. Joint ownership documents (mortgage statement, credit card statement, bank statement, etc.) rental/lease agreement, homeowner's insurance policy, auto insurance policy or automobile registration.

    If married within 6 months of enrollment date, marriage certificate stands alone

2. Employees requesting coverage of spouses will need to provide verification that the spouse is not able to obtain health insurance via their employer, if employed. A letter stating this will need to be submitted to HR Administrator. Homefull will follow up with a dependent coverage audit. Letters must state the spouse's employer's name and address. If the spouse is currently not employed or is self-employed, the letter should state that as the reason for enrolling in Homefull's medical coverage.

To Enroll dependents to age of 26:

1. **Natural child or legally adopted child**: Child's social security number and copy of birth certificate or adoption orders

2. **Stepchild:** Child's social security number, copy of birth certificate ***and*** a copies of your marriage certificate along with most recent joint tax return Federal Income Tax Return (black out financial information), if spouse files married separately also submit first page of spouse's tax return from the same year being provided.

3. **Legal guardianship of child**: Signed court order and tax return claiming the child as a dependent, if court order is dated in last 6 months' tax return is not required.

4. **Child who is subject to Qualified Medical Child Support Order:** Signed court order

For permanently disabled unmarried children over age 26 in addition to above requirements also submit a Social Security award letter.

HOMEFULL PERSONNEL POLICIES
Benefits: Employee Assistance Program (EAP)

Policy:
Homefull offers resources in the form of an employee assistance program (EAP) through *EmployeeConnect* for its employees and their family members when they are faced with personal challenges that may be impacting employee performance. These challenges may include, but are not limited to, financial, legal, alcohol or drug dependence, physical or mental health, familial, etc. These resources can be accessed in-person, online, or on the phone at no cost to the employee.

Procedure:
A Homefull employee or their family members can voluntarily and confidentially refer themselves to any *EmployeeConnect* resource including in-person guidance and 24/7 assistance online, on the mobile app, or with a toll-free call. In some instances, an employee may be referred to the EAP by a Homefull supervisor, chief, director, or HR professional, in which case the employee reserves the right to accept or refuse participation. However, there may be instances where continued employment with Homefull is contingent upon said employee contacting EAP professionals for assistance.

***EmployeeConnect* contact information**
Website: GuidanceResources.com (username: LFGSupport, password: LFGSupport1)
App: GuidanceNow mobile app
Phone number: 888-628-4824

Meeting or Speaking with *EmployeeConnect* Professionals
A Homefull employee or their family members can meet in-person for help with short-term issues up to five sessions per person, per issue, per year. 24/7 assistance online, on the mobile app, or with a toll-free call can be utilized by the Homefull employee or their family member regarding family matters, legal information, or financial guidance. The Homefull employee and their family members also have access to a wide range of information and resources on the website.

Visits During Work Hours
Unless prior approval from a chief or director of Homefull has been made, in-person meetings that are urgent or are only available during work hours will be treated similarly to a doctor's appointment (please see Time Off policy).

Confidentiality
Contact between the EAP and a Homefull employee or member of their family is completely confidential. In instances where continued employment is contingent upon said employee contacting EAP professionals for assistance, the EAP professional will only verify whether the employee contacted said EAP and, if applicable, that the employee is following through on recommended treatment.

HOMEFULL PERSONNEL POLICIES
Benefits: Workers Comp

Policy:
As an employer, Homefull maintains Workers Compensation insurance for all states in which employees are located. Homefull utilizes a third party entity to provide risk solutions, prevent losses, and manage claim processing in accordance with all federal and state laws.

Procedure:
Upon injury on the job, an employee should report the injury immediately to their supervisor. Within 24 hours or less the injury should be reported to the HR Administrator, preferably via the Employee Injury Report when possible. If it is a serious injury and medical attention is needed right away, the employee should report to the closest Emergency Room.

The HR Administrator will report the injury via a First Report of Injury (FROI) form to the appropriate entity for claims processing. The employee will seek medical care at the guidance of the oversight entity.

Pursuant to waiting periods for Workers Comp insurance to cover lost wages, Homefull will pay regular time for the waiting period. Any lost time following the established waiting period will be determined as eligible workers comp pay by the appropriate entity. Homefull will resume regular work time pay when the employee is released to return to work.

When possible, Homefull will make accommodations to assigned responsibilities based on medical provider recommendations for return to work.

HOMEFULL PERSONNEL POLICIES
Benefits: Scholarship Fund for GGs Employees

Policy:
Homefull is invested in developing graduating high school seniors and current college/trade school attendees to have opportunities for furthering their educational opportunities. Graduating seniors/college students/trade school students that are employed with the Homefull Gettysburg Grocery for a minimum of 4 months will be eligible to apply for a scholarship to be used for a verifiable trade program or for college.

Procedure:
In April of every year, Homefull will release information regarding applying for the annual GG's Scholarship Fund. This application announcement will include instructions for length of application essay, questions to answer, due date, and eligibility criteria.

Homefull will assign a Scholarship Fund review team to score applications; this review team at a minimum will include the CEO or COO or Chief of Administration, the CBDO, an HR Associate, and the Grocery Manager. Additional staff will be assigned to ensure an odd number of review team members.

Eligibility criteria may change annually but at a minimum applicants must be minors employed by the Gettysburg Grocery, have been employed for at least 4 months, and have satisfactory or better performance evaluations.

The GG's Scholarship can be awarded for use to cover costs for a trade school, certificate program, college, or other educational or vocational achievement. Homefull will to provide at least $500 to 2 GG's employees per scholarship cycle.

Homefull Personnel Policies
Employee Emergency Assistance Fund

Policy:
The Employee Emergency Assistance Fund (EEAF) for Homefull employees provides one-time assistance to help employees who experience unexpected economic hardships as a result of a disaster or personal emergency and who otherwise would not have the ability to cover basic or emergency needs. This assistance could include housing cost, clothing, food, or other emergency need.

Emergency Fund eligibility: All employees of Homefull and its affiliates are eligible for assistance through EEAF. In addition, former employees ("retirees") who have completed 25 or more years of active employment with Homefull or an affiliate company are eligible. Current or former executive officers of Homefull or its affiliates are not eligible for this program (e.g. title with Chief level designation).

Eligible expenses: The EEAF Committee will consider requests to provide short-term financial assistance for emergency expenses resulting from a natural, federal or state disaster, or a personal emergency. Some examples include:

- Extreme medical expenses,
- Funeral and burial expenses for an immediate family member,
- Expenses related to repairing damage to the individual's home or property which makes it uninhabitable, e.g. flood, fire, etc.,
- Food and shelter expenses related to an emergency situation, e.g. domestic abuse, weather evacuations, power and water outages, etc.

Procedure:
EEAF applications: Individuals seeking assistance are required to complete the Emergency Assistance Fund application form and provide sufficient documentation, including invoices and verification documents to support the requests. Employees can email HomefullHR@homefull.org to receive an application form and ask questions about the EEAF.
Assistance amounts: Since the size of the EEAF is limited, assistance awards may not be large enough to deal with all expenses incurred in each situation. The amount of assistance provided is determined based on an evaluation of the nature of the event, the emergency expenses incurred, financial need, other resources available and the size of prior assistance if provided for similar situations. No assistance amount will exceed the amount of the total need. A typical assistance amount will not exceed $1000.

Application decision-making process: The Homefull EEAF committee made up of individuals from different departments and levels to provide a balanced view. The Committee will review applications,

verifies eligibility, and makes recommendations to the CEO who
has the final authority to approve or deny assistance through the EEAF. The EEAF Committee will include at a minimum: COO, Chief of Administration, and the Health & Safety Director.

Process timing: The full application process should take no more than 3 weeks but could be a minimum of two weeks due to review of needed paperwork. Due to the often emergency nature of requests, the EEAF Committee makes every effort to review and act on assistance applications within one week of receipt of applications and supporting documentation.

Once the Homefull EEAF Committee has reviewed a request and all required forms are complete and submitted, they will refer the application to the CEO for final approval. The CEO typically provides the final determination and approves the disbursement of the assistance payment within seven business days.

Privacy: The EEAF Committee and managers involved will respect the applicant's privacy and confidentiality, consistent with the assistance decision-making process.

HOMEFULL PERSONNEL POLICIES
Pay Practices
(COA: RPM1)

Policy:
Homefull will maintain pay practices consistent with all federal and state laws. Payroll will be completed electronically with all paychecks being direct deposited. Homefull will comply with mandatory deductions and will provide transparency on paystubs regarding those deductions.

Procedure:

- *Paychecks* - All employees are paid every other Friday for a 2 week period each time. Paychecks are direct deposited via the online payroll system.
- *Direct deposit* – Homefull utilizes electronic payroll systems. Employees enter banking information into the online payroll system as part of their onboarding process. Bank routing information and account number is required.
- *Timesheets* - Timesheets are part of the online payroll system record. The employee clocks in and out daily to record their worked time. Supervisors will review and approve these online payroll system timesheets when the pay period ends. Pursuant to the Fair Labor Standards Act, non-exempt employees working over 40 hours in a work-week (Monday-Sunday) will be paid overtime. Homefull's practice is to provide flex time within the same week should an employee need to work in excess of 8 hours for one day.
- *Deductions* - Federal, state, and local laws require that the employer make certain deductions from every employee's compensable earnings. These include applicable federal, state, and local income taxes and Social Security. Eligible employees may authorize voluntary deductions for benefit participation. Pay setoffs are taken to pay off a debt or obligation to the Agency or others. Homefull will follow any legal directives regarding wage garnishment when appropriate paperwork is received.

Should an error with direct deposit occur after a paycheck is issued, Homefull will alert the online payroll system as to the error and the pending payment to be returned. Once the payroll company confirms that the paycheck "bounced back" Homefull will reissue payment to the employee. Homefull aims to complete this reissued paycheck no later than 5 business days following the payday with the incorrect direct deposit.

HOMEFULL PERSONNEL POLICIES
Pay: Overtime

Policy:
Homefull has established guidelines for the payment of overtime compensation for non-exempt employees that is in compliance with government regulations. This policy is consistent with the Fair Labor Standards Act. Pursuant to said Act, employees with salaries under $35,568 will be classified as non-exempt and will be paid overtime for hours worked over 40 in a workweek.

Procedure:
Employees with the status of non-exempt will be paid overtime for hours worked above 40 in a given workweek. A workweek at Homefull consists of Monday-Sunday. Non-exempt employees include those whose annual salaries (whether hourly paid or salaried) are $35,568 or less. All overtime must be authorized by management prior to actually being worked. This includes the immediate supervisor and the Chief Operating Officer or assigned HR representative. In situations in which overtime is unavoidable, flex time within the same week will be utilized when possible. In situations in which an employee feels overtime is needed but has not been prior approved, the emergency situation must be reported immediately to the supervisor.

All hours worked in excess of 40 are compensated at 1.5 times the hourly rate. Employees must actually work 40 hours in a one-week period in order to be eligible for overtime compensation. Designated holidays, company designated emergencies, vacation, jury duty and bereavement leave are not included for purposes of calculating hours worked per week. All hours spent attending work-related lectures, meetings and training programs during normal working hours are also eligible for overtime compensation. For example:

> If a paid holiday falls on a Monday (like Labor Day) and an employee works 9 hours a day Tuesday-Friday, the employee would have 44 total hours of paid time for that week (9*4=36 + 8 holiday hours = 44 hours). Due to 8 of the hours not being actual work time, the overtime rate would not kick in. The employee would be paid 44 hours of regular time for this week.

Compensatory time off for non-exempt employees is not permitted under Wage and Hour Laws except if taken in the same week in which the overtime occurs. Managers do not have the discretion to award compensatory time off under any other circumstances. Managers do have the responsibility to work with their assigned staff to address flex scheduling within a week in order to balance days that go beyond 8 hours so that a full week does not exceed 40 hours.

Employees who are non-exempt but are salaried should report their actual time worked on their timecards for submission and approval. Time reported should be in 15-minute increments with anything 7 minutes or under being rounded down and anything 8 minutes and over being rounded up to the nearest quarter hour.

HOMEFULL PERSONNEL POLICIES
Pay: Mileage & Business Expense Reimbursement

Policy:
Homefull will reimburse employees for reasonable business travel and other expenses incurred while on assignments away from the normal work location or in the course of performing your normal job responsibilities. All expenses must be approved in advance by the supervisor or in some cases the CEO. Homefull will reimburse employees for mileage expense for traveling to perform work-related activities. The rate, updated as of 11/1/2023, is 65 cents per mile and this will be reviewed (but not necessarily changed) annually.

Procedure:
When expenses are incurred, employees should submit receipts and an expense report. Mileage should be computed and submitted monthly on the Mileage Reimbursement Form. Expense reports and accompanying documentation are due before the 5th of the month to the employee's supervisor for approval.

Homefull will issue reimbursement electronically along with the employee's paycheck on the 15th of the month. This reimbursement will be noted on the paystub (accessed via the payroll system) and will not be taxed.

Effective 9/1/14, the maximum allowable mileage reimbursement per employee will be $200 per month. This varies per division/geography of assignment.

The CEO is available to provide guidance on eligible expense reimbursement activities.

HOMEFULL PERSONNEL POLICIES
Paid Time Off: Holidays, Vacation, Sick, Bereavement, Jury Duty

Policy:
Homefull will offer paid time off (PTO) to all benefits eligible employees. This PTO will include vacation days and sick days as one pool of PTO. Additional paid time off includes government recognized holidays, jury duty, and bereavement time.

Procedure:
HOLIDAYS:
The company has designated 11 holidays as recognized by the federal government. Full time benefits eligible Homefull staff will be paid holiday time off for the following holidays. Employees within their 90-day new hire probationary period will not be eligible for paid holidays until successful completion of their 90 day new hire period.

- New Year's Day
- Martin Luther King, Jr. Day
- President's Day
- Memorial Day
- Juneteenth
- Independence Day
- Labor Day
- Indigenous People's Day/Columbus Day
- Veteran's Day
- Thanksgiving Day
- Christmas

If a holiday listed above falls on a weekend day, there is no adjustment for that specific holiday for that year. Holiday time is paid as an 8 hour work day. Staff with flexible work schedules will be required to adjust weeks with a holiday to account for the 8 hour holiday (e.g. a 4 ten-hour work week would become a 5 day week with 1 eight-hour holiday plus 4 eight-hour workdays).

Exception for hourly paid staff who work in a 24/7 staffed program: As these programs need to be staffed non-stop even during 90 day probation periods and do not close even on bank/federal holidays, these are considered regular work days. These staff that work on holidays will receive holiday pay for those hours. For this staff classification, holidays that fall during the 90 day probation period that are not worked will be unpaid. Staff that are scheduled to work a holiday but call off for the day, PTO will be assigned or if the employee does not have PTO it will be unpaid.

For employees who use vacation time immediately before and after a holiday (i.e. "sandwiches" a paid holiday), the holiday will count as vacation time. Employees working less than a full time schedule will be compensated for holidays on a pro-rata basis depending upon the number of regularly scheduled hours of work on the day the holiday falls.

PTO (Paid Time Off):
Homefull staff are awarded paid time off (PTO) benefits based on length of service. In addition to vacation time, PTO is designed to cover leave for personal sickness, family sickness, family activities and extra holiday time. Employees may find they need time away from work prior to accruing the hours necessary. In such cases and under special circumstances, with prior approval of the supervisor and HR personnel, an employee may build up a negative balance. Employees will accrue time off based on the following length of service chart:

Years of Service	hours earned per pay period	total days earned per year
0-5 years	4.61 hours	15 days
5-10 years	6.15 hours	20 days
10-16 years	9.23 hours	30 days
16+ years	10.76 hours	35 days

In general, PTO requests must be preapproved and prescheduled with a 2 week notice. In the event of sudden illness or emergency, a “call off” of less than 24 hours’ notice is allowed. Unscheduled PTO (i.e. call offs) exceeding more than 2 consecutive days will require a doctor’s note and in some cases a return to work letter. In the case where PTO is requested for a day preceding and following a holiday, aka the holiday is “sandwiched” by PTO, the holiday then becomes PTO time as well, deducting from the employee’s available PTO pot.

A maximum of 40 hours of accrued but unused PTO time may be carried over from one calendar year to the next (for employees over 10 years of service, the cap is 80 hours). Exceptions to the carryover policy will be subject to HR personnel discretion.

Employees who move from FT benefits eligible status to PT status will cease accumulating PTO hours as of the point that their status changes. The current PTO balance at the time of the status change will remain available and will be applied if the now-PT employee calls off or requests time off of their established schedule until the PTO balance reaches zero. If employment is terminated for any reason, the employee will be paid for all *earned and unused* PTO time based on their pay rate. Final paychecks will include deductions for any negative balance upon termination.

BEREAVEMENT:
Up to five days of paid bereavement leave will be provided to all full-time employees (including those in their 90-day probationary period) for the death of an immediate family member. Homefull defines 'immediate’ and ‘immediate-extended’ family as:

- the employee's spouse,
- parent (including step parent and parent-in-law),
- child (including step child),
- sibling (including half, step, and in- law),
- grandparents (including step and in- law),
- aunt (step/in-law),
- uncle (step/in-law) and

- niece/nephew (step/in-law)

Employees needing this leave should contact their manager as soon as possible. Bereavement leave will normally be granted unless there are unusual business needs or staffing requirements.

Bereavement leave is granted per event and is not cumulative. Any employee needing time in addition to the approved bereavement leave can request to utilize PTO.

JURY DUTY:
Homefull encourages employees to fulfill their civic responsibilities by serving jury duty when required. Employees in a benefits-eligible position may request up to one week of paid jury duty leave over a 12-month period. Any available paid time off may be used beyond the one week paid period, or the employee may request unpaid time off. Employees must show the jury duty summons to their supervisor as soon as possible to accommodate the absence. Employees will be paid regular time during their approved jury duty absence.

HOMEFULL PERSONNEL POLICIES
Paid Time Off (PTO) Buyback Policy

Policy:
The purpose of this policy is to establish the terms and conditions under which eligible employees may elect to convert a portion of their accrued but unused Paid Time Off (PTO) hours into a cash payment. The program is intended to provide employees with additional financial flexibility while ensuring that sufficient PTO balances are retained to support personal needs for time off.

Homefull will permit an annual PTO "buyback" opportunity each December, subject to the eligibility criteria and limitations set forth in this policy. Participation in the PTO Buyback Program is voluntary and is not guaranteed each year but will be based on budget availability. Homefull reserves the right to modify, suspend, or discontinue this program at its discretion.

Procedure:
To participate in the PTO Buyback Program, employees must meet all of the following conditions as of **December 1** of the applicable calendar year:

1. The employee must be a **regular full-time benefits-eligible employee** in good standing.
2. The employee must have an accrued PTO balance that exceeds the applicable carryover threshold (40 hours for employees under 10 years; 80 hours for those over 10 years):
    - Employees with fewer than ten (10) years of employment **must maintain a minimum balance of forty (40) hours after any buyback transaction**.
    - Employees with ten (10) or more years of employment **must maintain a minimum balance of eighty (80) hours after any buyback transaction.**
3. Employees whose accrued PTO balance is at or below the applicable carryover threshold are not eligible to participate in the buyback program.

Annual Buyback Window

- The PTO Buyback Program shall be conducted **once annually in December**.
- The HR Department will announce the specifics including the payment schedule, deadline for requests, and amounts available each year, usually in November.
- Buyback payments will typically be processed with the **first payroll of December**.

Amount Eligible for Buyback

- Employees may request to cash out only the PTO hours **in excess of the applicable carryover threshold**.
- The **maximum payout per employee per calendar year** shall not exceed **three thousand dollars ($3,000.00)** gross.
- Employees may not "zero out" their PTO balances as a result of a buyback.

Rate of Conversion

- The buyback value shall be calculated based on the employee's **current base hourly rate** at the time of payout.

- For salaried employees, the hourly rate shall be determined by dividing the employee's **annual base salary by 2,080 hours (the number of hours possible to work per year based on 40 hours per week and 52 weeks per year)**.

Tax Treatment

- PTO buyback payments shall be treated as **supplemental income** in accordance with Internal Revenue Service (IRS) regulations.
- Applicable federal, state, and local taxes will be withheld at the supplemental wage rate in effect at the time of payment.

Annual PTO Buyback Process

- The Human Resources Department will distribute a **PTO Buyback Request Form** during the annual buyback window. Employees wishing to participate must complete and submit the form by the published deadline. Homefull reserves the right to deny or adjust buyback requests that do not comply with the provisions of this policy.
- HR and/or the Payroll team will:
  - Verify the employee's eligibility;
  - Confirm the available PTO balance for buyback;
  - Calculate the gross payout amount;
  - Submit the approved payout for processing through Payroll; and
  - Will notify the employee of the confirmed Buyback amount to be paid.

Administrative Provisions

- Participation in the PTO Buyback Program is voluntary and subject to the availability of funds and administrative capacity.
- Homefull expressly reserves the right to amend, suspend, or terminate this policy, in whole or in part, at any time without prior notice.
- This policy does not create a contract of employment, guarantee of benefits, or vested right to payment.

HOMEFULL PERSONNEL POLICIES
Volunteer Time Off
(COA: HR3)

Policy:
In order to acknowledge and encourage employee interest in contributing to the larger community beyond the impact of Homefull's direct work, Homefull will maintain a Volunteer Time Off (VTO) policy as a subsection in the Paid Time Off (PTO) section of the Personnel Policies. Regular, benefits eligible employees in good standing can use the VTO policy subject to supervisor and CEO approval.

Procedure:
Full time, benefits eligible, employees who have been actively employed for a minimum of 6 months may request up to 24 hours (or 3 work days) of VTO per calendar year using the VTO request form. Volunteer activities conducted under VTO should be under the direction of a recognized non-profit organization or public school. The activities cannot directly benefit the employee's family members, meaning as a recipient of the services. Categories may include but are not limited to: environmental causes, food insecurity, health, foster care, and/or educational programs. Examples of activities not eligible for VTO include but are not limited to: parent/teacher conferences, activities conducted during scheduled PTO, and/or coaching a sports league.

The balance of VTO hours will be available each calendar year at the start of the year. Unused hours cannot be carried over or added to previous years.

The request must include an attachment with information about the agenda if an organized activity or information about the organization. A request form is included in the appendix of the full policy manual.

HOMEFULL PERSONNEL POLICIES
Time Off: Personal Leave

Policy:
Homefull will consider a personal leave of absence without pay to benefits-eligible employees who wish to take time off from work to fulfill personal obligations. This leave may be granted for a period of up to 30 calendar days within a 12-month period. Extensions may be granted of an additional 5 calendar days. Available sick leave or vacation (PTO) may be granted as part of the leave. The Agency will continue to provide health insurance benefits for the full period of the approved personal leave.

Procedure:
- Employees should submit a personal leave request to the HR Administrator and supervisor as soon as he or she becomes aware of the need.
- Management will consider an employee's overall performance record, anticipated workload requirements and staffing considerations when reviewing a request for personal leave. The decision to grant personal leave is at the sole discretion of the Agency.
- When an employee is ready to return from a personal leave of absence, Homefull will attempt to return the employee to a position for which the employee is qualified, based on business conditions and provided an opening exists. However, there is no guarantee of employment whether stated or implied. If no position is available, employment status will be terminated at that time.

HOMEFULL PERSONNEL POLICIES
Time Off: Military Leave

Policy:
Military leave is granted to all employees serving in the Armed Forces for drills, active duty call-up, summer training camp, etc. All requests for military leave of absences, paid or unpaid, will be granted in accordance with governmental legal requirements.

Procedure:
Employees returning from a military leave of absence are returned to the Agency in accordance with the rules and regulations of the Universal Uniformed Services Employment and Reemployment Rights Act (USERRA).

HOMEFULL PERSONNEL POLICIES
Time Off: Emergency Conditions

Policy:
From time to time, emergency conditions may arise and Homefull may be officially designated as "closed". Emergency conditions are defined as adverse weather, local hazardous situations, civil disobedience, etc. The CEO makes determinations of emergency conditions.

Procedure:
- If Homefull is officially designated as "closed" due to emergency conditions, all employees will be paid for regularly scheduled work hours.
- If Homefull is NOT officially designated as "closed" and an employee elects to stay home, employees will have the option of charging the time off as a vacation day or taking the time off without pay. Employees are responsible for notifying their immediate manager if they are unable to make it into work.

HOMEFULL PERSONNEL POLICIES
Personal Medical Leave and Family and Medical Leave Act (FMLA)

Policy:
Eligible employees of Homefull may be entitled to a leave of absence under the Family and Medical Leave Act (FMLA) for up to 12 weeks of unpaid job-protected leave during a 12 month period. Eligibility for FMLA leave is based upon certain guidelines and must be certified by your doctor if related to a personal medical leave need, certification of family member care needed may be required to care for a family member. In 2020, the federal FMLA was updated to include the FFCRA (Families First Coronavirus Response Act). As such, Homefull will follow all guidelines set forth in the FFCRA for all dates required. An FFCRA poster with specific qualifications and entitlements is included in the Appendix for reference.

Employees on leave (FMLA approved or not) for personal medical reasons should follow policy related to filing a claim for short term disability coverage to assist with partial coverage of salary. This current policy does not address employee pay while on leave. Disapproval of a short/long term disability claim does not necessarily impact approval of FLMA leave request however, if an employee is not FMLA eligible, the approval of a short/long term disability claim will suffice as approval for leave.

Procedure:
Employees who have been employed by Homefull for 12 months or more AND have worked 1250 hours preceding the date of requested leave and have available FMLA hours and have a qualifying condition/reason certified by a health care provider can qualify for FMLA.

Employees are required to notify their employer of the need for FMLA leave due to:

- Your own serious health condition that prevents you from being able to perform your job
- Your spouse, child or parent's serious health condition preventing you from being able to perform your job
- The birth or adoption of your child
- Care of a spouse, child, parent or next of kin with serious injury or illness incurred or exacerbated within 5 years of active duty in the Armed Forces
- Qualifying exigency arising out of the fact that a spouse, child, or parent is on active duty in the Armed Forces or deployed to a foreign country

Homefull employees will follow all normal attendance processes when the need to miss work arises; your immediate supervisor will provide the employee with the information regarding when to contact Sedgwick, Homefull's FMLA administrator. Employees will work directly with Sedgwick to process the FMLA benefits. If the need for medical leave is foreseeable, for example if you know if you will miss work due to a surgery, employees should notify Sedgwick prior to the absence. Any available paid time off (PTO) will be used prior to the employee entering short term disability status.

As described in the DOL's Fact Sheet #28A (Employee Protections under the Family and Medical Leave Act), during FMLA approved leave, the cost of benefits will continue as when the employee is on active work status: 80% paid by Homefull and 20% paid by the employee for medical and dental coverage; 100% paid by the employee for vision and other optional insurances; 100% paid by Homefull for short and long term disability and basic life insurance. The employee can opt to forward their 20% share from their short term disability pay if desired or can select to reimburse Homefull for their full share upon return to work. The employee should notify Homefull of the preferred option at the start of the approved leave.

Regardless of the status of a short/long term disability claim, if further leave is needed following the exhaustion of FMLA approved leave and the employee does not opt to terminate employment at that time, the employee will then assume full responsibility for any insurance coverage they wish to continue. The employee will be given information on COBRA coverage to continue their medical insurance at that time and will be discontinued from all Homefull group insurance coverage. This procedure will apply equally to an employee on personal medical leave regardless of FMLA approval status (e.g. in instances where an employee is not eligible for FMLA coverage but is in need of a short-term medical leave from work).

Returning to work requires a medical clearance letter from the treating physician if the FMLA leave was related to the employee's health. This letter should be sent to HR staff prior to the return to work date and arrangements will be made for job assignments for returning. Upon return to active full time status, the employee will return to full benefits with Homefull resuming the established employer coverage of costs. Upon a return to active employment status, employees will assume a probation status similar to a new employee and depending on the length of leave, re-training may be required.

HOMEFULL PERSONNEL POLICIES
Pregnancy & Parental Leave

Policy:

Homefull encourages employees to utilize Leave time to care for a newborn child or newly adopted or fostered child (referred to as Parental Leave in this policy), or due to a pregnancy-related medical condition (referred to as Pregnancy Leave in this policy). Homefull provides Pregnancy and Parental Leaves of Absence to all eligible employees in accordance with the Family and Medical Leave Act (FMLA), Pregnancy Discrimination Act (PDA), Americans with Disabilities Act (ADA), and Ohio law.

Pregnancy Leave is provided in accordance with Homefull's short-term disability plan for full-time, benefit-eligible employees experiencing pregnancy-related disabilities causing need for a Leave of Absence in excess of Parental Leave. For eligibility for short-term disability, employees will be required to submit medical certification of their disability to the benefits carrier. Parental Leave and Pregnancy Leave are provided as described below. Parental Leave is not considered PTO and as such is not accrued, carried over year to year, or paid out upon termination of employment.

Homefull's intent is for a birth parent to receive full pay during the 6 week period typically approved by short term disability coverage and as such will follow guidelines as set forth by the short term disability carrier as it relates to a waiting period for benefits to start, the percentage of pay covered by the carrier, and the time period in total. Additionally, for non-birth parents utilizing Parental Leave, the period approved will follow similar timelines as for the birth parent on short term disability leave.

Procedure:

Eligibility

- Parental Leave:
  Benefits-eligible employees may request Parental Leave prior to the birth, adoption, or fostering of a child. In addition, employees must also meet one of the following criteria:
  - have given birth to a child;
  - are the spouse or committed partner to someone who has given birth to a child;
  - are the intended parent for a newborn birthed via surrogacy; or
  - have adopted a child or been placed with a foster child (in either case, the child must be age 17 or younger). The adoption of a spouse's child is excluded from this policy.

  Since short term disability typically covers a 6 week period for post-birth but they require a 1 week waiting period before financial benefits start, the period covered by Homefull's Parental Leave policy will be 5 weeks to coincide with the paid short term disability leave for an employee giving birth to a baby. Eligible employees will receive a maximum of 5 weeks of paid Parental Leave per birth, adoption, or placement of a child/children. Multiple births, adoptions, or placements occur (e.g., the birth of twins or adoption of siblings) constitute a

single leave and will not result in any extension of the existing policy. In addition, in no case will an employee receive more than 5 weeks of paid parental leave in a rolling 12-month period, regardless of whether more than one birth, adoption, or foster care placement event occurs within that 12-month time frame.

- Pregnancy Leave:
  A benefits-eligible employee who is giving birth but requires leave for medical purposes prior to date of delivery would be able to request Pregnancy Leave and thereby submit a claim for short term disability coverage up to the date of birth. Additionally, after approved Parental Leave has ended but the employee giving birth needs additional time off for the employee's own medical recovery following childbirth, the employee must submit a claim for short term disability coverage. A period of leave following Parental Leave therefore would be a short term disability leave and compensation would be provided in accordance with Homefull's short term disability policy.

Pay, Time Frame, and Duration of Paid Parental Leave

- Pay: the intent of Paid Parental Leave is to ensure that the employee receives compensation equal to 100% of the employee's regular, straight-time pay. Paid Parental Leave will be paid on the cycle of regular payroll on regularly scheduled pay dates.

- Time Frame: Approved paid Parental Leave for the employee who is a non-birth parent (e.g. partner of someone giving birth, new parent to an adopted child, etc.) may be taken at any time during the six-month period immediately following the birth, adoption, or placement of a child with the employee. Paid Parental Leave may not be used or extended beyond this six-month time frame. Employees giving birth will have Parental Leave start as of the date of delivery and will run concurrently with short term disability.

- Duration: For an employee who has given birth, the 5 weeks of paid Parental Leave will begin one week after the day of delivery (to run parallel to the 7 day waiting period and then 5 weeks of short term disability pay) and will supplement the amount of short term disability pay in order for the employee to receive an amount equal to 100% of their pay. For example if short term disability pays 60% of the employee's pay, Homefull will provide 40% to equal 100% of the normal pay rate; if short term disability pays a dollar amount of $500, Homefull will provide the variance from $500 to the normal pay rate.

Coordination with Other Policies

Employees must take paid Parental Leave in one continuous period. Any unused Parental Leave will be forfeited at the end of the 6-month time frame.

Upon termination of the individual's employment at Homefull, the individual will not be paid for any unused paid Parental or Pregnancy Leave for which they are eligible.

Paid Parental Leave taken under this policy will run concurrently with leave under the FMLA; thus,

any leave taken under this policy that falls under the definition of circumstances qualifying for leave due to the birth or placement of a child due to adoption or foster care, the leave will be counted towards the approved period of available FMLA leave per a 12-month period. All other requirements and provisions under the FMLA will apply. In no case will the total amount of leave—whether paid or unpaid—granted to the employee under the FMLA exceed 12 weeks during the 12-month FMLA period. Please refer to the Family and Medical Leave Policy for further guidance on the FMLA.

After the 5 weeks of paid Parental Leave is exhausted, if an employee who has given birth has a need for additional time beyond the 6 weeks period of leave approved by the short term disability carrier due to medical issues or complications, short term disability will be requested. If not approved by the carrier but the extended leave is still needed, the employee can request to use available PTO. Short term disability approval may in some situations require a waiting period before compensation begins. PTO will be applied during this waiting period.

Homefull will maintain all benefits for employees during the paid parental leave period just as if they were taking any other company paid leave.

If a company holiday occurs while the employee is on paid parental leave, such day will be charged to holiday pay; however, such holiday pay will not extend the total paid parental leave entitlement.

Requesting Paid Parental Leave
Employees will provide their supervisor and the Human Resources Department with notice of the request for leave at least 30 days prior to the proposed date of the leave (or, if the leave was not foreseeable, as soon as possible). Employees must submit a written request for parental leave and provide all documentation as required by the HR department to substantiate the request.

As is the case with all Homefull policies, Homefull has the exclusive right to interpret this policy.

HOMEFULL PERSONNEL POLICIES
Administrative Leave

Policy:
Administrative leave may be utilized if an urgent need arises to temporarily relieve an employee of their normal job responsibilities. The employee is asked to remain at home during regular (up to 40) work hours but continues to be maintained as active employment status, meaning they receive regular pay (up to 40 hrs) and benefits. Administrative leave employees are still considered on duty so they must be available during their regularly scheduled workday if deemed necessary.

An employee may be placed on an Administrative Leave, with or without notice, for the following circumstances, including but not limited to:

Administrative Investigation:
- Administration to review/investigate a claim involving the employee
- To secure particularly sensitive information or resources if warranted by the circumstances
- To prevent disruption in the workplace and maintain a professional environment
- To investigate allegations of misconduct

Misconduct not requiring termination that may also require investigation:
- Dishonesty, theft or misappropriation of company funds or property
- Violence on the job
- Gross safety, negligence or acts endangering others
- Insubordination
- Any other conduct that warrants removing the employee from the worksite.

Whistleblowers:
- To protect an employee who has reported misconduct or illegal activity from potential retaliation
- In the event an employee is reporting retaliation for reporting activities

Behavioral Health:
- If the employee exhibits suicidal ideation, statements, or attempts at the workplace
- If the employee's use of drugs or alcohol overlaps with the workplace including inebriation at work and/or use at work and/or interrupted work due to attendance or other drug use behaviors
- To remove an employee from the workplace who is behaving disruptively (pending an assessment of the situation)

Administrative Leave vs Suspension: While the two may seem similar, there are minor differences between an administrative leave and a suspension.
- A suspension may be paid or unpaid depending upon the circumstance and severity of the infraction. Since a suspension is usually a form of a disciplinary action, it is usually unpaid as

the employees work hours during that time period are discounted and they are not entitled to be paid for that period.

- An administrative leave generally occurs during an investigative period and will be paid as you are expected to be available to work during your regularly scheduled workday(s).

Procedure:

Homefull's leadership team and HR team will follow Human Resources policy related to Administrative Leave needs and steps.

In certain circumstances, other Leave policies may be utilized following an Administrative Leave based on the reasons for further Leave being required.

Homefull HR Team will communicate with the employee being placed on Leave as to the reason for the Leave, duration of the Leave, and any required activities during and for return from the Leave.

HOMEFULL PERSONNEL POLICIES
Paid Sabbatical Policy

Policy:
Homefull recognizes that our employees are our most important resource and that after years of service, an employee may need leave from the work that is not for medical or family leave reasons. This sabbatical policy is adopted in the interest of maintaining a strong, effective and enthusiastic organizational culture. Sabbatical leaves can help employees gain fresh perspectives and encourage personal and professional growth.

Procedure:
Any full-time permanent member of the staff, after 6 years of continuous service as a full-time employee of Homefull, is eligible for paid sabbatical leave not to exceed 12 weeks. During a period of paid sabbatical leave, an employee is relieved of all routine and emergency duties. In addition, during paid sabbatical leave, the employee shall receive full compensation and continuation of medical and other insurance benefits as well as continued enrollment in Homefull's retirement plan however no matching contributions will be made during this period. PTO accrual will be suspended during the Sabbatical Leave status,

Any staff member eligible for paid sabbatical leave under this policy shall submit to the CEO a written request for such leave. Such a request must be submitted at least 90 days prior to the date upon which the requested leave would begin. In the case of the CEO, request for leave shall be submitted to the President of the Board of Trustees. All requests for leave must include the following: (1) A statement of the duration of the requested leave; (2) A statement of how the leave will be spent; (3) A strategy for how the employee's responsibilities would be met during the period of the leave; (4) A statement of the financial impact of the leave on the agency and how that impact will be ameliorated.

The decision whether to grant a request for leave under this policy shall be made at the discretion of the CEO. With respect to a request for leave by the CEO, the decision to grant the request shall be made at the discretion of the Board of Trustees. After a first sabbatical leave, an employee shall be eligible for subsequent leaves after each five-year period of employment. No compensation shall be given in lieu of sabbatical or for unused sabbatical time.

Prior to the sabbatical leave commencing, all tech equipment should be turned in to Homefull HR and all accounts will be suspended during this leave period.

Following an approved sabbatical leave, should an employee decide to leave employment with Homefull and not return to regular full time work status, the time equal to the approved sabbatical leave will be deducted from any accrued and unused PTO. If the sabbatical leave time was in excess of the available accrued PTO, the cost of that additional PTO will be deducted from a final paycheck. If there is remaining PTO after the sabbatical leave time is deducted, the remaining PTO will be paid out to the employee as their last paycheck.

HOMEFULL PERSONNEL POLICIES
Breaks/Meal Periods

Policy:
Breaks and lunch time off are periods of time, specified by Homefull, during which employees are not actively working on the job. Employees use break time, which generally lasts from 5 – 15 minutes per four hours worked, for personal use. Homefull is not required by law to supply breaks and lunch free time at work.

Procedure:
Homefull provides fulltime employees lunch periods, which typically last from 30 – 60 minutes, and meal periods are unpaid. Employees are allowed to leave for an offsite meal or utilize facilities onsite for this period. The exception to this is the Engagement Specialist role that is onsite at a PSH alone. This staff person must take their lunch/meal break onsite while continuing to perform their duties and are paid for this time.

For non-exempt employees, lunch or meal breaks are not considered to be work time by the Department of Labor and are not compensable. Breaks consisting of 15 minutes or less are allowable as paid time. Exempt employees take their meal break when they find convenient time and it does not interfere with their work.

HOMEFULL PERSONNEL POLICIES
New Employee Orientation

Policy:
Orientation programs assist staff in understanding organizational values and culture, and as a result, encourage commitment to the organization. As an ongoing process, orientation begins during recruitment and selection, and continues as needed throughout the individual's employment. Human Resources and the management team, along with the other appropriate staff, are responsible for this process. The orientation program for new staff members begins immediately and its length is determined by many factors including experience, education and abilities.

Procedure:
New employees will attend a new employee orientation with assigned HR staff. Program Managers or the immediate supervisor of the new hire will provide new employees with an orientation specific to their workplace. Program Managers will provide on-the-job training needed for new employees to assume their responsibilities. New employees will be provided with timely and relevant benefit information.

Orientation will begin with HR representation and include reviewing appropriate personnel forms and providing information and resources about agency wide policies.

At orientation, new employees will be given a Homefull ID badge and appropriate keys/key cards for their assigned locations as well as tech devices needed for their position. Replacements for lost keys/key card will be issued one time at no cost and if further replacements are needed, the employee will incur a cost of $75 for key cards and $25 for hard copy keys. In some cases if multiple locks need to be changed in a building, additional costs may be charged. Technology agreements will be signed by new staff and replacement technology costs are included in that agreement.

HOMEFULL PERSONNEL POLICIES
Electronic Workplace
(COA: PRG4)

Policy:
Agency-provided equipment, software and communication systems, including but not limited to, computers, iPad, e-mail and voice mail systems, are Agency property and as such are provided to employees for business purposes. Communications and/or documents prepared using Agency systems are the property of the Agency. Employees should be aware that these communications and/or documents are not private but rather are business records subject to subpoena by a court of law.

Homefull reserves the right to monitor, access, diHSCLose and use the content of communications and/or documents composed, sent or received on Agency systems for any legitimate business purpose (determined by the Agency in its sole discretion) at any time and without notice.

Procedure:
- Employees are expected to exercise reasonable business judgment, subject to management approval, in their use of Agency systems. Employees are not to use their Agency-provided Internet address when communicating personal viewpoints on the Internet. Additionally, employees are not to conduct themselves in a manner that could bring harm or embarrassment to the Agency nor take any action that could result in liability to the Agency.
- Employees' use of Agency systems is governed by and subject to all Agency policies and state and federal laws. For example, employees are not to use Agency systems to harass, intimidate or make discriminating remarks about others; to view, store or distribute sexually oriented materials; or for their own personal gain.
- Inappropriate use of Agency systems is grounds for corrective action up to and including termination, and possible legal action. Employees who discover a violation of the policy must report it to management.
- Passwords are private and are not to be shared with anyone inside or outside the Agency. Passwords should be something not easily recalled by anyone other than the employee. In the event someone learns the identity of a password, the employee is responsible for immediately securing a new one.
- Employees are expected to protect and manage the equipment assigned to them.

HOMEFULL PERSONNEL POLICIES
Personal Telephone Policy

Policy:
Homefull maintains a policy to limit personal phone use during work hours and will present this policy to new employees upon hire.

Procedure:
Homefull recognizes that there may occasionally be times when personal calls must be made or received during business hours. Such calls must be held to a minimum, however, and must not interfere with the employee's work. Employees are encouraged to make such calls during their breaks or at lunchtime. During work hours, employees of Homefull should keep the use of personal cell phones for personal calls to a minimum. A staff member who receives a personal call on his/her cell phone while working with a client or in a meeting should let the call go to voicemail and wait until an appropriate time to return the call. In most cases, this means the call will be returned during a lunch break or during a brief break from professional duties.

No Homefull employee should use the text messaging feature of his/her cell phone to communicate any confidential client-related information to any other person, even to professional contacts. Text messaging is not a secure medium for communication, and client-related information should never be shared in this way. As with personal calls, time spent on sending and receiving personal text messages should be kept to a minimum, and should never interfere with service to our clients. Under no circumstances should any staff member initiate or respond to a text message while interacting with clients, peers at other agencies, or other professional contacts.

HOMEFULL PERSONNEL POLICIES

Phone Usage by Staff

(COA: RPM5)

***Policy*:**

When the job function of the employee requires considerable time outside of his/her assigned office, work area, or at irregular hours or the agency does not provide either a traditional landline or company issued cell phone, some designated employees may be required to make business telephone calls and send and receive business e-mail and text messages via personal cell phones using the agency's telecommunication app Vonage.

***Procedure*:**

These Homefull designated employees who are required to perform these functions as part of their job duties will either be issued a Company-owned cell phone or will receive reasonable reimbursement for the value of the use of their personal cell phones in direct consequence of the discharge of their job duties. Homefull will provide a monthly stipend to supplement the cost of maintaining a personal mobile phone that can successfully operate the Vonage app. The amount of this stipend will not fully cover the cost of monthly service or purchasing a phone, rather it is intended to subsidize the monthly cost. The stipend will be considered a non-taxable fringe benefit to the employee. The level of cash subsidy (stipend) will be determined by a person's job duties as it relates to cell phone use and access. Homefull will review and set the amounts to be provided for stipends and reimbursement on an annual basis.

HOMEFULL PERSONNEL POLICIES
Employee Email Communication Policy
(COA: PRG4, RPM5)

Policy:
Email is an official mechanism for communication with Homefull employees. Email communications are intended to meet the administrative needs of Homefull and may be used to communicate to employees regarding business that is critical to the operation and function of the organization.

Procedure:
Homefull assigned employee e-mail accounts shall be a means of communication with all employees. Unless exempted by Homefull, all employees are expected to have an agency email account. Employees are expected to check their email on a regular basis in order to stay current with Homefull related communications. Employees are also expected to responsibly manage their e-mail account on a frequent and consistent basis (i.e. archiving attachments, deleting old messages, etc.)

Department heads and supervisors are encouraged to, whenever possible, provide computer access to employees whose positions do not provide them with regular access to a computer, as well as a reasonable amount of time to use the computer provided for the purpose of checking their e-mail. Managers who supervise employees who do not have a Homefull email account must make arrangements for alternative methods of access to communications.

Privacy of e-mail
Homefull uses various methods to protect the security of its computer and network resources and of its users' accounts. Users should be aware that any electronic communications and data utilizing Homefull owned computer and network resources may be disclosed under federal laws and regulations.

Monitoring of Communications
Homefull will not monitor electronic mail as a routine matter, but it may do so to the extent permitted periodically as it deems necessary for purposes of maintaining the integrity and effective operation of Homefull's electronic mail systems.

HOMEFULL PERSONNEL POLICIES
Media Policy
(COA: CR2)

Policy:
Employees of Homefull are sometimes asked by the media for statements regarding current situations at our program sites or about trends affecting the homeless. Staff members do not provide information or comments to the media unless they have received permission/direction from the agency's CEO to do so. Should you receive calls or visits from the media, be polite, but do not share any information.

Procedure:
In the case of media wishing to interview clients of our agency, this is permitted only with prior approval by the agency's CEO. This policy is consistent with the agency's Client Confidentiality Policies & Procedures, and is intended to protect the rights and privacy of the clients we serve. Even if one or more clients indicate that they would like to be interviewed, this is not permitted at our program sites without prior approval and signed releases from the clients. In the event that a consumer or their guardian allows Homefull to share their photo/video image and/or details regarding their experience, and other personal information, a Media Release will be obtained prior to dissemination of information. The signed Media Release will be maintained in the client's record. A copy of the Media Release is in the Appendix for reference.

Telephone Inquiries
If a media representative calls your program site looking for someone to give a statement or answer questions, let him/her know that all media inquiries should be directed to the agency's administrative office at 293-1945 during business hours, which are 9 a.m. to 5 p.m., Monday through Friday. Immediately notify your supervisor and/or the on-call person for your program site about the call. If the call occurs on a weekend or outside of normal business hours contact the on-call administrator.

In-Person Inquiries
If a newspaper reporter/photographer or a television camera crew shows up unannounced at your program site, remain calm and professional at all times, but do not provide any statements or information. If your supervisor is on-site, ask him/her to come take the lead in explaining our agency policy. If it is during normal business hours, you or your supervisor should call the agency's administrative office at 293-1945 to see if the CEO is available to speak with the media representative. If neither person is available then speak to another administrator.

Media Seeking Specific Clients
On occasion, reporters contact our agency in an effort to get in touch with a particular individual who may be a client. Per the agency's Client Confidentiality Policies & Procedures, we can neither confirm nor deny that any individual is a current or past client of our agency. This is true for <u>all</u> of our programs. If necessary, you may refer the reporter to the agency's CEO at 293-1945.

HOMEFULL PERSONNEL POLICIES
Social Media Policy
(COA: CR2, RPM5)

***Policy*:**
This policy governs the publication of and commentary on social media by employees of Homefull and its related programs (Homefull Solutions, Homefull Innovations, and Homefull Services) as well as engagement on social media with clients. For the purposes of this policy, social media means any facility for online publication and commentary, including without limitation blogs, wikis, and social networking sites such as Facebook, Twitter, Instagram, LinkedIn, Flickr, and YouTube. This policy is in addition to and complements any existing or future policies regarding the use of technology, computers, e-mail, and the internet. Homefull employees are free to publish or comment via personal social media accounts in accordance with this policy. Homefull employees are subject to this policy to the extent that they identify themselves as a Homefull employee (other than as an incidental personal mention of place of employment on topics unrelated to Homefull).

Notwithstanding the previous section, this policy applies to all uses of social media, including personal use, or use as a representative of Homefull. All uses of social media must follow the same ethical standards that Homefull employees must otherwise follow.

Confidentiality & Sensitive Information
It is perfectly acceptable to talk about your work and have a dialog with the community, but it is not okay to publish confidential information. Confidential information includes things such as unpublished details about current and future projects, financial information, research, client information, and any other data that is considered sensitive. We must respect the privacy of our clients and our partners.

Be Honest
Do not blog or post information on social media sites anonymously using pseudonyms or false screen names when posting information regarding or pertaining to Homefull. Use your real name, be clear about who you are, and identify that you work for Homefull when posting information regarding or pertaining to Homefull, or when promoting Homefull events. Do not post anything that is dishonest, untrue, or misleading. Be cautious about posting personal details.

Respect Copyright Laws
It is critical that you show proper respect for the laws governing copyright and fair use or fair dealing of copyright materials owned by others, including Homefull's own copyright and brands. You should never quote more than short excerpts of someone else's work, and always attribute such work to the original author or source. It is good practice that you link to others' work rather than reproduce it.

Respect Your Audience, Homefull, and Your Coworkers
The public in general, and Homefull's employees and clients, reflect a diverse set of customs, values, and points of views. Do not say anything contradictory or in conflict with the Homefull website. Express yourself respectfully. This includes not only refraining from the use of ethnic slurs, offensive comments, defamatory comments, personal insults, or obscenity, but also using proper consideration of

privacy and of topic that may be considered objectionable or inflammatory – such as politics and religion. Use your best judgement and be sure to make it clear that the views and opinions expressed by you are yours alone and do not represent the official views of Homefull.

Protect Homefull's Clients
Clients should not be cited or obviously referenced via any personal social media account. Stories or personal information shared on Homefull's accounts will have proper releases obtained; posts made from the official Homefull accounts may be "re-shared" via personal accounts. In the event that a consumer or their guardian allows Homefull to share their photo/video image and/or details regarding their experience, and other personal information, a Media Release will be obtained prior to dissemination of information. The signed Media Release will be maintained in the client's record. A copy of the Media Release is in the Appendix for reference.

Engaging with Clients
In order to avoid dual relationships and conflicts of interest, and in order to ensure client confidentiality and privacy, do not "friend" or "follow" them on social media platforms, and do not accept requests by clients to follow your accounts. You may politely inform them of the agency's policy during follow-up or if the client asks why you have not accepted their request.
Do not seek out or access clients' personal profiles or accounts on various social media platforms. While the information posted on those sites may be public, it may also be considered a breach of privacy if that information is accessed without consent or prior permission. Seek advice from the Chief Development Officer if you believe you have grounds for an exception.

Additionally, be aware of your own profiles and what is broadcasted on them. Be mindful that pages and accounts you "follow" or "like" may be public and may inadvertently negatively impact your persona or your relationships with clients. Be wary of images or posts in which you are "tagged", as well; while you may be able to control your profile, this may also impact your relationships with clients.

Think About the Consequences
Proper judgement is part of the code of conduct of Homefull employees. Using your own blog or social media accounts to talk negatively about Homefull, our clients, or your co-workers is unprofessional.

Disclaimers
Present disclaimers prominently and visibly; it is acceptable to state where you work, that what you say does not represent the agency, and/or that you are not speaking on behalf of Homefull on any official capacity. However, do not count on it to avoid trouble as it may not have much legal effect. The Chief Development Officer can provide you with applicable disclaimer language and assist with determining where and how to use that.

Do Not Forget Your Day Job
Make sure that use of social media does not interfere with your job or with commitments to clients.

Procedure:
Policy violations will be subject to disciplinary action, up to and including termination.

HOMEFULL PERSONNEL POLICIES
Outside Employment Policy
(COA: GOV7)

Policy:
Homefull employees may be allowed outside employment provided that such employment: 1) in no way interferes with the performance of the employee's duties, or responsibilities; and 2) is performed outside the employee's approved work schedule and off any Homefull program sites.

Procedure:
For purposes of this Policy, "outside employment" includes self-employment, consulting activities, and volunteer activities that, if compensated, could be considered outside employment. An example of a volunteer would be a bookkeeper who volunteers as a treasurer for his/her church.

1. The outside employment policy is to be reviewed with all Homefull employees at least once annually. New employees are to be instructed on the outside employment policy during their orientation period.
2. Employees are not required to notify their supervisor of outside employment if it is conducted outside of regular work hours, off premises, and does not require the job skills and/or qualifications used in his/her employment at Homefull.
3. Employees are required to request approval for outside employment if the outside employment is conducted during regular work hours, on premises, or if it requires the same job skills and/or qualifications used in his/her employment at Homefull, including if it presents a real or perceived conflict of interest.
4. When required, requests for approval of outside employment are to be submitted to a Program Manager prior to the beginning of that employment.
5. Each employee's request for outside employment is to be reviewed and decided on its own merits, considering such factors such as the type of work to be done, the type of business and the duration of employment.
6. Approval for outside employment is valid for one calendar year or until the outside employment changes. Each change in outside employment meeting the guidelines outlined in 3, above, requires specific prior approval.
7. If the outside employment negatively impacts on the employee's work at Homefull, a Program Manager may withdraw approval for that outside employment. The employee and CEO are to be notified if approval for outside employment is withdrawn. This notification should provide the reason(s) for this action.
8. Failure to obtain prior approval for outside employment, or engaging in outside employment when such approval has been denied, may result in disciplinary action.
9. The decision to approve or deny the outside employment rests with Homefull.
10. Homefull is to maintain documentation of outside employment requests on file.

HOMEFULL PERSONNEL POLICIES
Visitors in the Workplace

Policy:
Only visitors who are properly authorized may be on Homefull project sites. This helps to maintain safety standards, safeguard employee and customer welfare, protect our property and facilities, guard confidential information against theft, and reduce potential distractions and disturbances.

Because of safety and security reasons, we ask that you discourage family and friends from visiting you at work. If you do have a visitor, we will ask you to meet that person outside of your work area.

Procedure:
All visitors should enter any Homefull project site and report immediately to the Program Manager. If you have visitors, you are responsible for their conduct and to watch out for their safety.

If you see an unauthorized person at work, notify your supervisor immediately or direct the person to the Administration offices.

Employees in violation of this policy may face disciplinary action.

HOMEFULL PERSONNEL POLICIES
Homefull Employee Personal Property

Policy:
Homefull employees are responsible for the care and safekeeping of their personal property during the course of employment. Employees must keep personal property brought onto Homefull Program sites in a safe and secure place. Homefull accepts no responsibility for loss of or damage to cars, motorcycles, scooters or bicycles (or their contents) brought onto Homefull Program sites, whether they are left in parked cars, cycles racks or otherwise. Employees are expected to make their own insurance arrangements for their personal property. Payment for items lost or destroyed while performing the job function will be based on the estimated value of the property, not its new replacement cost. An employee is not entitled to compensation under this policy where a claim is dealt with under a personal insurance policy. Any payment made is on an ex gratia basis and does not signify any admission of liability by Homefull.

Procedure:
Homefull will compensate an employee for lost, stolen or damaged personal property that belongs solely to the employee in the following circumstances only:

1. Theft, burglary or fire while on duty provided that adequate precautions for safeguarding the property had been taken by the employee. This provision applies at any Homefull Program sites.
2. Damage due to accidents in the course of duty provided that the damage could not have been avoided by the employee taking reasonable care and was caused by circumstances which were clearly exceptional or by negligence on behalf of Homefull. These provisions apply any Homefull Program sites.
3. Tools of the trade, Homefull will compensate employees for loss of or damage to any personal tools of the trade while on Homefull premises provided they were properly stored when not in use and that there was no negligence on the part of the employee.
4. Property lent to the Homefull, Homefull will compensate employees for the loss or damage to any personally owned properties lent to it following a specific request from Homefull.

Employees should complete a written request for lost, stolen or damaged property form and submit it to their manager. Before agreeing to compensate Homefull employee, managers should be satisfied of the following:
· It was reasonable for the employee to have had the item in question at work
· All reasonable precautions to secure the safety of the property were taken by the employee
· It is appropriate for the employee to make a claim against Homefull rather than their own insurance policy. When assessing compensation, managers have the discretion to take into account contributory negligence.

HOMEFULL PERSONNEL POLICIES
Homefull Vehicles and New Driver Process

Policy:
Homefull maintains agency vehicles for the use during agency/client-related activities. Employees shall be approved by agency insurance and pass an in-house driving test in order to be allowed to drive agency vehicles. Employees shall follow the procedures for requesting and using agency vehicles. Adherence to all policies and procedures pertaining to vehicle safety is strictly enforced. See the Health and Safety section for details on vehicle safety policies and procedures.

Procedure:

- Upon confirmation from Homefull HR that the employee will be covered by agency vehicle insurance, the employee will be scheduled for an in-house driving test and Drivaroo app training.

- Drivaroo app training and the driving test may be scheduled on the same day or as it fits into the schedules of the assigned staff.

- Prior to the driving test, the employee should review vehicle policies and procedures and sign an acknowledgement form that they have reviewed these. The acknowledgement form should be provided to the staff assigned to monitor the driving test.

- Passing status on the driving test should be logged onto the appropriate form and maintained in the personnel record.

- Employees must reserve the vehicle on the appropriate calendar that corresponds with the vehicle they want to use (e.g. Cargo Van calendar vs. Passenger Van calendar).

- The employee will pick up keys for the vehicle at the office where the vehicle is assigned to be parked, and will sign showing receipt of the keys.

- Before departing with the vehicle, employees must log the starting mileage in Drivaroo and perform a visual inspection of the vehicle noting any issues such as dents, scratches, or maintenance items.

- When returning at the scheduled time, employees must check that there is at least ½ of a tank of gas left in the vehicle. If the tank is less than ½ full, please obtain a credit card from a Program Manager and fill the tank or the employee may choose to fill the tank with their own funds and submit for reimbursement

- Before returning the keys to the proper staff and location, employees must log the ending mileage. The vehicles are expected to be cleaned of any debris and no items are to be left in the vehicles.

- If any issues arrive during usage of an agency vehicle, employees should notify a manager immediately so the issues can be addressed.

    - If an accident should occur while operating a Homefull vehicle, employees are to follow guidelines in the Vehicle Acknowledgement Form and as reviewed in the policies prior to becoming an approved driver.
    - These include: reporting accidents immediately if they occur, take pictures of damage, exchange contact information but be clear that the vehicle and insurance are in Homefull's name, and do not exchange cash or personal information for any damages.

- It is expected that all vehicles are maintained in a safe and operable manner. If you suspect any repairs or maintenance issues that need to be addressed please bring it to the attention of the appropriate manager immediately.

- If an employee desires to borrow an agency vehicle for personal use, the request must be approved by the CEO at least 1 week in advance. The employee must show proof of personal vehicle insurance in order to remove the agency vehicle for personal use. The employee must sign the Vehicle use form that includes the date of use as well as the date and time of return. Agency vehicles may not be used for illegal activity and all regular agency vehicle policies must be followed. Any damage or loss that occurs during personal use will be the responsibility of the employee.

See Health and Safety section regarding safety issues for vehicle usage.

HOMEFULL PERSONNEL POLICIES
Job Postings
(COA: HR2)

Policy:
The position posting process helps to identify and communicate open positions in order to give first consideration to current employees who possess the required skills and qualifications. It is the policy of Homefull to announce open positions internally as frequently as possible with exceptions only in situations where filling the position quickly is urgent to the functioning of the particular program and/or agency. It is Homefull's policy to promote from within when appropriate and possible.

Procedure:
- Open positions are posted via All Staff email notification or regular employee newsletter.
- Interested employees can express their interest in open positions by speaking first with their supervisor and then submitting a letter of interest to HR.
- Eligibility: Interested employees must have been in their current role for a minimum of 6 months, have received a better than satisfactory performance evaluation for the most recent employee performance evaluation, and have a satisfactory attendance record.
- For positions in which an internal candidate is not identified, the open position will be posted for external recruitment.
- Exceptions to the posting process may occur for certain positions, such as executive management, Agency restructuring, and student positions.

HOMEFULL PERSONNEL POLICIES
Staff Training/Professional Development Policy
(COA: HR3, TS2)

Policy:
The purpose of this policy is to support continuous learning by Homefull employees through opportunities for participation in work-related development and training. Such opportunities include professional development classes, workshops and seminars. All full-time and part-time staff employees of Homefull are eligible to participate in staff development and training programs. Temporary and student employees are not eligible for programs offered under this policy unless specifically directed by the CEO.

Homefull encourages ongoing training and development of its employees and is committed to providing assistance and resources that allow employees to develop and grow within Homefull. Funds will be made available on an annual basis to support employee development and training opportunities. These funds may be used to cover program enrollment fees and books/learning tools during the training program. Funds may also be used for seminars and workshops. Funds are available only to eligible employees once they are approved by the supervisor and CEO. Decisions regarding approving the training will be based on appropriateness/need of training, timing, and cost effectiveness. Individuals are responsible for their own personal development and CEU requirements. Homefull will make every effort to provide training and CEU opportunities for staff which are free to the employee.

Program Managers are responsible to provide support and reasonable opportunities for employee development and to discuss employee development goals as part of employee performance. Homefull provides time off from regular duties for program participation. An employee must receive approval from his or her manager before being granted time off to attend such training programs. Employees are not required to make up time missed due to participation in such training programs, and the time off will not be charged to leave time. In granting time off for training programs, the supervisor must consider the agency needs and the employee's development needs for each request submitted. CEO will be responsible for review and final approval of all requests for funds under this policy.

Procedure:
Employees who wish to participate in training/professional development opportunities under this program must request to participate in a particular training above and beyond those already offered through Homefull and attach documentation related to the training program and submit it to their supervisor at least two weeks in advance of the date of the program. The employee's supervisor and the CEO must approve program participation. Fees needed to cover the cost will be paid directly to the entity providing the training.

HOMEFULL PERSONNEL POLICIES
Educational Planning

Policy:
Homefull supports employees in the pursuit of furthering their education. As this can be a mutual benefit to the organization and the employee, Homefull encourages staff to pursue educational opportunities as appropriate and available. Should an employee decide to pursue educational plans while employed at Homefull, it is the organization's policy that plans are discussed with Human Resources and the employee's direct supervisor in the event that educational requirements interfere with scheduling and/or work expectations.

Procedure:
When an employee is considering pursuing an educational program, he/she is expected to inform his/her supervisor and Human Resources of this decision. The employee should discuss any information related to how class schedules may impact work schedule and whether there are program requirements that might impact the employee's work (e.g. internship requirements).

The supervisor, HR staff, and the employee should discuss the appropriateness of the degree program, the schedule, the impact on the organization, and the employee's goals. Any potential schedule impacts will need to be approved by the immediate supervisor, Senior Program Manager, and COO to ensure that the needs of the program are being met including availability for clients.

If an employee is hired under an understanding of the need to complete a specific education program, licensure test/application, or with an agreement that Homefull will provide needed supervision toward any licensure or training, Homefull reserves the right to request an agreement for the employee to stay with the organization for a specified period. Any such agreement will be signed by both the CEO and the employee.

HOMEFULL PERSONNEL POLICIES

Performance Evaluation

(COA: PQI2, PQI5, HR4; CSB: A12)

Policy:

Homefull's performance evaluation system offers a consistent approach and operating philosophy for providing feedback and assessment of employee performance through annual evaluation. All performance evaluations are tied directly to Homefull's Quality Assurance plan as each employee's performance impacts the overall performance of the organization.

A performance evaluation is designed to:

a. Promote and document performance assessments based on essential job functions and clear, realistic job standards; and
b. Promote a high level of employee performance through consistent feedback from supervisors via annual, semi-annual or 90 day probationary performance assessments.

Procedure:

Performance Evaluation (PE) is the responsibility of the Program Managers and Directors. Performance Evaluation is an on-going process that results in a year-end review.

A written Performance Evaluation, consisting of essential job functions with job related standards, shall be prepared by the manager with revisions made jointly with the employee. Completion of this form is the responsibility of the supervisor.

a. Periodically when requested an optional self-evaluation may be submitted to the supervisor by the employee. The manager completes the PE and reviews the evaluation with higher level(s) of management prior to final discussion with the employee. The manager then holds the year-end PE meeting with the employee. As applicable the annual pay increase is determined and subsequently communicated to the employee by the appropriate administrator.
b. The higher-level manager will approve the PE form. The form is signed by the manager and employee at the time of the final discussion of the form contents.
c. If an employee does not receive a PE according to the guidelines of this policy, the employee should appeal compliance through the appropriate chain of command.
d. The employee's signature indicates the employee has read the form, but does not necessarily indicate the employee's agreement with its content. The employee may complete the self-evaluation and attach it to the form.
e. The employee may address questions or concerns about the content of the evaluation with the appropriate manager. If issues are not resolved, then the employee may follow the departmental chain of command to resolve PE content issues.
f. If the employee receives an unacceptable rating on any essential job function, a performance improvement plan shall be completed. The manager shall meet with the employee on an ongoing

basis to provide regular feedback and coaching on performance issues for a period of 30 to 90 days. After this period of time, the manager shall re-evaluate that plan to ensure that steps have been taken to improve performance in relevant areas.

Feedback and Coaching

Feedback and coaching should occur on an ongoing basis and at the optional mid-year review. The purpose of feedback and coaching is to provide managers with an opportunity to recognize effective performance and provide coaching for improvement. As a part of the feedback and coaching components, employees are encouraged to gather informal feedback as appropriate throughout the year. Managers should provide timely feedback to motivate employees toward improved performance. The mid-year review is an optional progress meeting which should provide an opportunity for managers and employees to discuss and update job standards set at the beginning of the year and focus on employee performance to date.

HOMEFULL PERSONNEL POLICIES
Corrective Action

Policy:
To provide a fair and equitable means to address employee performance and behavior deficiencies, Homefull has established corrective action guidelines to be followed in the event an employee's behavior or performance falls below acceptable levels. When coaching fails to yield the desired standard of performance, the corrective action process will be implemented. Corrective action is usually implemented in steps, with each step marginally more serious than the last. Depending on the severity of the behavior or performance issue, the process may be implemented at any step. Additionally, an employee generally moves to the next step in the process even if the corrective action is based on a new or different behavior or performance issue.

Procedure:
The steps in the process are Counseling & HR Memo, Written Warning/Corrective Action, reassignment if appropriate, and Termination of Employment. The following provides detailed information concerning each step in the Corrective Action Process:

1. Counseling/Verbal Warning - This is the employee's first formal notification that a performance or behavior problem exists and that correction or improvement to an acceptable level must be made to avoid further corrective action steps. An HR memo is written to record that the conversation occurred and usually is documented after informal coaching and counseling happens. Essential elements of the counseling or coaching session include:

a) Description of the behavior or performance problem.

b) Identification of the behavior or performance criteria to be met.

c) Timeframe in which the employee must meet the behavior or performance criteria. In certain situations, the timeframe can be immediate.

d) Consequences if performance does not improve.

e) Statement that, should acceptable behavior or performance be achieved, the employee must sustain the improvement or face additional corrective action, including termination of employment.

2. Written Warning/Corrective Action - If the employee's behavior or performance has not improved and if the manager believes the employee's behavior or performance can be improved, the next step may be implemented. By placing the employee on a Corrective Action, the manager is giving the employee final notice that the unacceptable behavior or performance must be corrected or improved to the required level to avoid termination of employment. Essential elements include:

a) Reference to previous counseling/coaching re: performance;

b) The timeframe in which behavior or performance MUST be brought to the acceptable level;

If the employee fails to meet the performance objectives or if the performance problem recurs after the Corrective Action period is over, he/she may be terminated without additional warning.

3. Termination – This step is implemented when any of these situations occur:

a) The employee has gone through the preceding steps and insufficient improvement has been achieved.

b) The employee has failed to sustain improved performance or behavior after having gone through the corrective action process.

c) The performance or behavior issue is so severe as to warrant immediate termination of employment.

An exception to this would occur when an employee possesses appropriate skills, professionalism, and "right fit" and may be a better fit in a different position. Reassignment may be considered should an appropriate position be available.

Suspension - An employee's employment at the Agency may be suspended as part of an investigatory period in determining the appropriateness of a correction action. The employee will not be paid during this suspension. However, if the investigation indicates that corrective action is not warranted, the employee will receive back pay for the scheduled hours not worked.

Documentation - Managers are expected to maintain appropriate documentation on all corrective action issues. Documentation can occur with the Corrective Action Form or with the Performance Appraisal. If the corrective action is contained within the Performance Appraisal, care must be taken to include all essential elements as noted above.

Process Acceleration - The Corrective Action Process may be accelerated for new hires where performance deficiency or job/skills mismatch is evident within the first year of employment during which the new employee may be terminated at any time without prior warning. Acceleration can also occur where job requirements change to the extent that an employee with longer tenure no longer possesses the skills to satisfactorily perform the duties of the position.

HOMEFULL PERSONNEL POLICIES
Employee Grievance
(COA: HR3; CSB: A12)

Policy:
Homefull recognizes that problems arise between workers and between workers and their supervisors. Attempts to provide satisfactory resolution to staff problems are initiated as soon as problems become apparent. When a problem is not resolved immediately or when staff believe that a satisfactory resolution has not been derived, staff may invoke the Agency's complaint/grievance procedure.

Procedure:
The grievance should be submitted in writing to the Chief Operating Officer. In the event that the grievance is related to the COO, it should be submitted to the CEO. A grievance form is in the forms section.

The grievance and final resolution will remain with the CEO.

HOMEFULL PERSONNEL POLICIES
Summary Dismissal

***Policy**:*
Summary dismissal may occur when an employee is involved in any form of egregious or persistent insubordination, dishonesty or misconduct. Summary Dismissal may occur without warning.

***Procedure**:*
Such situations would include, but are not limited to:

- Refusal to obey instructions
- Consuming, possessing, or being under the influence of alcohol and/or drugs during working hours or at any time on Agency property
- Falsification of employment records
- Falsification of any expense records or Agency operating records
- Theft; causing, creating or participating in a disruption of any kind during working hours or on Agency property
- Committing a fraudulent act or breach of trust in any circumstances
- Conviction of a felony or misdemeanor
- Removal or use of Agency property without authorization
- Sexual or racial harassment
- Unlawful discrimination
- Violation of the Agency's Conduct Policy

HOMEFULL PERSONNEL POLICIES
Separation by Resignation

Policy:
Homefull employees will submit a written, dated letter of resignation to their immediate supervisor stating reason(s) for separation. Homefull requests a minimum of 2 weeks notification of resignation. Employees may be asked to complete an exit interview.

Procedure:
A two-week written notice is standard and should be submitted to your immediate supervisor. This notice will be placed into your personnel file. Longer notice periods may be appropriate for key positions, and alternative notice arrangements may be negotiated with the staff member at the employing unit's discretion. Staff are expected to work through their notice period which includes not using sick or vacation time after a resignation notice is submitted, unless an alternative arrangement has been made or time off request approved prior to notice. Additionally, staff may not use vacation or compensatory time to extend the notice period.

Staff may request to rescind a resignation through the effective date of resignation. For unclassified staff, acceptance of the withdrawal of the resignation is at the CEOs discretion. Managers should consult with the CEO, upon receiving a request to rescind a resignation.

Resigning Homefull employees will return all Homefull property. Staff must return all property on or before the last work day, at a time determined by management. Departing staff may be asked to participate in an Exit Interview on or near their last date of employment.

HOMEFULL PERSONNEL POLICIES
Separations

Policy:
The Agency intends that people who separate do so with a positive view of the Agency, to the extent possible.

Procedure:

- Communication about departure process, benefits, and final pay will be conducted by HR as soon as a resignation is received or at the time of termination if the departure is involuntary. This communication will include information on the cost of medical insurance for the final month of employment, remaining PTO payout if applicable, and other details as needed.
- An offboarding appointment will be scheduled for the final date of employment that will include collection of tech equipment, keys, Homefull issued apparel, and any final paperwork.
- The employee's personnel file will reflect whether the separation was voluntary or involuntary.
- Neutral job references will be provided in the event of employment inquiries.

APPENDIX

Appendix Table of Contents

- Table of org
- Table of org with current names
- Performance evaluation format
- PQI Plan
- HMIS Policies and Procedures
- Columbus HMIS Training Guide
- Bowman Systems Client Data Manual
- Maintenance Checklist
- Vehicle Condition Report
- Behavior Support and Management Plan
- Homefull Consumer Handbook
- Client Confidentiality Policies and Procedures
- Client Grievance Response Form
- VAWA Emergency Transfer Plan & Info
- New Employee Orientation Outline
- Program Manager Job Description
- Blank Release of Information
- Blank Media Release (Authorization of Use)
- Property Management Manual
- Guidelines for Handling Electronic Documents
- Blank Critical MUI Review Form
- Dropbox Business Security
- Homefull Employee Handbook
- Online payroll system Security Information