

NORTHWEST COMMUNITY ACTION, INC.
PERSONNEL POLICIES AND PROCEDURES
REVISED AND UPDATED November 1, 2017

Contents

ARTICLE I - GENERAL PURPOSE.....	2
ARTICLE II - CONDITIONS GOVERNING EMPLOYMENT.....	3
ARTICLE III - HIRING POLICIES.....	7
ARTICLE IV - CLASSES OF EMPLOYEES.....	8
ARTICLE V - PROBATION.....	9
ARTICLE VI - WORKING CONDITIONS.....	10
ARTICLE VII - JOB DESCRIPTIONS.....	12
ARTICLE VIII - EVALUATIONS.....	13
ARTICLE IX - DATA PRIVACY.....	14
ARTICLE X-STAFF AND SPECIAL MEETINGS.....	17
ARTICLE XI - SALARIES AND PROMOTIONS.....	18
ARTICLE XII - TERMINATION OF EMPLOYMENT.....	20
ARTICLE XIII - EMPLOYEE BENEFITS.....	21
ARTICLE XIV - EMPLOYEE RELATION/HEALTH AND WELFARE COSTS.....	25
ARTICLE XV - EMPLOYEE CONDUCT.....	26
ARTICLE XVI - REIMBURSEMENT FOR EMPLOYMENT AND BOARD EXPENSES.....	27
ARTICLE XVII - POLICY FOR AGENCY/HEAD START VEHICLES.....	30
ARTICLE XVIII - DISCIPLINARY ACTIONS.....	31
ARTICLE XIX - GRIEVANCE PROCEDURES.....	33
ARTICLE XX - OUTSIDE AGENCY EMPLOYMENT POLICY.....	34
ARTICLE XXI - EMPLOYEE ORIENTATION POLICY.....	35
ARTICLE XXII - TRAINING AND CAREER DEVELOPMENT.....	36
ARTICLE XXIII - SEXUAL ANTI-HARASSMENT POLICY.....	37
HEAD START CHILD ABUSE POLICY.....	38
MALTREATMENT OF VULNERABLE ADULTS REPORTING POLICY.....	40
Signature Page.....	xlii
Declaration Form for Prospective Employees in Head Start Programs.....	xliii
STATEMENT OF CONFIDENTIALITY.....	xliv

NORTHWEST COMMUNITY ACTION, INC.
PERSONNEL POLICIES AND PROCEDURES
REVISED AND UPDATED November 1, 2017

ARTICLE I - GENERAL PURPOSE

Section 1.1 - General

The purpose of these personnel policies is to provide a framework which will secure efficient and effective agency administration in order to carry out the objectives of Northwest Community Action, Inc. (NWCA), and to ensure the fair treatment of all NWCA employees.

The Board of Directors of Northwest Community Action, Inc. reserves the right to amend, change, add, or delete any portion of the Personnel Policies at any time for any reason.

The Governing Board of Northwest Community Action, Inc. reserves the right to be the final arbitrator and/or interpreter of the Policies, rules and regulations in the Personnel Policies.

All employees are expected to be in uniformity with the content and purpose of all these policies as established herein.

Section 1.2 -Affirmative Action Policy Statement

NWCA acknowledges that equal opportunity for all persons is a fundamental human value. It is the policy of NWCA to provide equal opportunity in employment and advancement for all persons; to provide access to, admission to, full utilization and benefits of training opportunities without discrimination because of race, color, creed, age, religion, national origin, sex, disability, handicap, or marital status.

A formal education, unless required by State, Federal, or County law, shall not be made a requirement for employment qualifications or advancement, neither in professional or non-professional capacities, if an applicant has the ability to perform the duties of the position.

NORTHWEST COMMUNITY ACTION, INC.
PERSONNEL POLICIES AND PROCEDURES
REVISED AND UPDATED November 1, 2017

ARTICLE II - CONDITIONS GOVERNING EMPLOYMENT

Section 2.1 - General

- A. **Discrimination Prohibited**
This Agency shall not discriminate in its hiring and personnel procedures against any applicant for employment, or any employee because of race, creed, color, national origin, sex, or age.
- B. **Partisan Political Activity**
Employment within NWCA may not be offered as a consideration or reward for the support or defeat of any political party or candidate for public office, nor may any person, as an employee, engage in partisan political activity. Employees must at all times be aware that Agency resources (including computers, email systems, personnel) cannot at any time be utilized in support of political activities.
- C. **Acceptance of Gifts and Gratuities**
Employees of this Agency are prohibited from accepting gifts, money, and gratuities from persons receiving benefits or services from NWCA, or performing services under contract, or otherwise in a position to benefit from an employee action.
- D. **Employment of Persons with Criminal Records**
All prospective employees of NWCA Head Start in compliance with 45 CFR Part 1301 Subpart D, are required to sign a declaration which lists:
1. All pending and prior criminal arrests and charges related to child sexual abuse and their disposition;
 2. Convictions related to other forms of child abuse and/or neglect; and
 3. All convictions of violent felonies.
- The declaration may exclude:
1. Traffic fines of \$200.00 or less;
 2. Any offense, other than any offense related to child abuse and/or child sexual abuse or violent felonies committed before the prospective employee's 18th birthday, which was finally adjudicated in a juvenile court or under a youth offender law;
 3. Any conviction for which the record has been expunged under Federal or State law; and
 4. Any conviction set aside under the Federal Youth Corrections Act or similar State authority.
- However, individuals who declare, through this form, that they have been arrested, charged with, or convicted of any of the offenses listed above are not automatically disqualified from being hired. The Agency must review each case to assess the relevance of an arrest, charge, or conviction to a hiring decision.
- E. **Subversive Membership**
Subversive membership in any organization whose objectives include overthrow of the Government of the United States by force or violence is inconsistent with employment in this Agency.
- F. **Public Office**
Employees of NWCA may participate in various elections as a candidate for public office, provided that these political activities take place during off-duty hours and in their private capacities. All employees are expected, however, to avoid (to the greatest extent possible) any identification of their off-duty activities with the Agency programs. This

NORTHWEST COMMUNITY ACTION, INC.
PERSONNEL POLICIES AND PROCEDURES
REVISED AND UPDATED November 1, 2017

requirement is to insure that NWCA programs remain free from partisan political bias, and that programs be administered in a nonpartisan manner.

Section 2.2 - Recruitment and Selection of Employees

A. Recruitment

When a job opening occurs in the Agency, existing staff will be reviewed for possible transfer or promotion prior to external recruitment activities. Notices of job openings will be posted in a conspicuous location at Northwest's central office. A letter of intent will be filed by prospective applicant, resume will be updated, and an interview will be conducted by appropriate supervisors, Board of Directors and/or Policy Council members.

When, in the opinion of the interview committee, no current staff are qualified for the vacant position the Agency will recruit outside applicants. The position will be advertised in at least one (1) issue of all appropriate newspapers and with proper recruitment sources, including Jobs and Training Offices, in time to insure that all area residents have the opportunity to become aware that the Agency is seeking applicants. The ad will include a statement that we are an Equal Opportunity Employer and Affirmative Action Employer.

All employment vacancies in the Agency will be listed with the State Job Service, depending on grant and/or contract requirements. All vacancies shall be posted in the Main Office. Public advertisement through appropriate area media may be made of such vacancies at the discretion of the Executive Director and/or Program Director.

B. Selection Procedures

1. The position of Executive Director shall be filled by the Board of Directors, acting through the Executive Committee. This committee shall insure that proper notification be made and that all applicants are given due consideration. The Board shall retain the right to reject any or all applicants. Upon selection of the Executive Director, the Executive Committee shall advise him/her of his/her responsibilities and insure that the position is assumed.
2. If the position of Assistant Director is to be filled, that person shall be hired by the Executive Committee of the Board of Directors with every consideration given to the recommendation of the Executive Director.
3. All other positions shall be filled by a procedure established by the Executive Director, and all applicants must be given due consideration.

Section 2.3 - Nepotism

- A. No person shall be employed by NWCA while the person or a member of the person's immediate family serves on a Board of Directors or Committee which either by rule or practice, regularly participates in making recommendations or decisions specifically affecting the appointment, retention, work assignment, promotion, salary, or working conditions.
- B. No person shall be employed by NWCA in a position over which a member of his/her immediate family holds the responsibility for employee selection and hiring or exercises supervisory authority.

Section 2.4 - Conflict of Interest

No employee, officer, or agent shall participate in the selection, award, or administration of a contract in which federal funds are used where, to his/her knowledge, he/she or his/her immediate family or partner has a financial interest or which whom he/she is negotiating or has any arrangement concerning prospective employment. The recipient's officers, employees, or agents shall neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or potential contractors. The Board of Directors will decide the disciplinary action for

NORTHWEST COMMUNITY ACTION, INC.
PERSONNEL POLICIES AND PROCEDURES
REVISED AND UPDATED November 1, 2017

any violation of this policy on a case by case basis. For the purpose of these Parts, 2.3 and 2.4, a member of an immediate family shall include any of the following persons:

1. Spouses or domestic partners
2. Brothers and sisters
3. Parents, children, grandchildren, and great-grandchildren
4. Spouses of individuals listed in 2 and 3
5. Corporations, partnerships, limited liability companies (LLCs), and other forms of businesses in which an employee or director, either individually or in combination with individuals listed in 1, 2, 3, or 4, collectively possesses a 35% [IRS definition of disqualified persons in IRC section 4958] or more ownership or beneficial interest.

When an employee believes the possibility for a conflict of interest exists, it is his/her duty to take action to avert the situation. The employee shall:

1. Cease the performance of duties that could create a conflict of interest and notify the appointing authority within one (1) working day of cessation.
2. Prepare a written statement describing the matter requiring action or a decision in the matter about a possible conflict of interest.
3. Take one of the following courses of action.
 - a. Deliver the statement to his/her appointing authority and request a clarification of the possibility of a conflict of interest. The appointing authority may request an advisory opinion from the program funding source or legal counsel. A copy of any advisory opinion issued by an appointing authority shall be sent to the Board of Directors.
 - b. Request an advisory opinion directly from the Board of Directors by delivering the statement to the Board. The Board shall issue an advisory opinion within seven (7) days and provide a copy to the employee and appointing authority.
4. If the employee's appointing authority or Board of Directors determines that a conflict of interest exists, the employee shall be relieved of the assignment and the appointing authority shall assign the matter to another qualified employee who does not present a conflict of interest. If it is not possible, the interested persons shall be notified of the conflict and the employee will proceed with the assignment.
5. A conflict of interest shall be determined to exist when a review of the situation by the employee and appointing authority or the Board of Directors provide any of the following would be present:
 - a. The use for personal gain or advantage of agency time, facilities, equipment, or supplies or influence of Agency position or employment.
 - b. Receipt or acceptance by the employee of any money or other thing of value from anyone other than the Agency for the performance of an act which the employee does recommend or effect to persons in the regular course of hours of Agency employment or is part of his/her duties as an employee.
 - c. Employee for a business which is subject to direct or indirect consideration or employees review, audit, or influence.

NORTHWEST COMMUNITY ACTION, INC.
PERSONNEL POLICIES AND PROCEDURES

REVISED AND UPDATED November 1, 2017

Reporting Responsibilities

Every employee, officer, and volunteer is responsible for immediately reporting suspected misconduct to their supervisor, Fiscal Director, or the Chair of the Finance/Audit Committee. When supervisors have received a report of suspected misconduct, they must immediately report such acts to their manager, the Fiscal Director or the Finance/Audit Committee.

Whistleblower Protection

The Organization will consider any reprisal against a reporting individual an act of misconduct subject to disciplinary procedures. A "reporting individual" is one who, in good faith, reported a suspected act of misconduct in accordance with this policy, or provided to a law enforcement officer any truthful information relating to the commission or possible commission of a federal offense or any other possible violation of the Organization's Code of Conduct.

NORTHWEST COMMUNITY ACTION, INC.
PERSONNEL POLICIES AND PROCEDURES
REVISED AND UPDATED November 1, 2017

ARTICLE III - HIRING POLICIES

Section 3.1 - Executive Director

The filling of the Executive Director position, screening, interviewing, and making recommendations will be done by a Committee appointed by the Board of Directors, and this Committee shall be representative of the sector represented on the Board of Directors.

Final approval for the position of Executive Director will be the responsibility of the Board of Directors.

Section 3.2 - Program Director

Applicants for Program Director shall be interviewed and hired by the Executive Director who will receive input from appropriate Program Committee and/or the Head Start Parent Policy Council when applicable, as per 45 CFR -1304 Appendix "B".

Section 3.3 - Support Staff

Hiring to fill positions for program or Agency support staff may be handled by Program Director in consultation with and final approval of the Executive Director. In hiring Head Start staff, the Policy Council will be consulted.

Section 3.4 - General

Special consideration for employment will be given to the low income residents of NWCA service area provided their qualifications meet the requirements specified by the job description.

Before an employee is hired a criminal records background check must be completed. If it is not feasible to obtain a criminal record check prior to hiring, an employee must not be considered permanent until such a check has been completed.

Section 3.5 – Head Start

Policy Council must approve the hiring of Head Start or Early Head Start employees. In an emergency or other time-limited situation where an employee must be in place quickly, the hiring will be conditional upon Policy Council approval at their next meeting which could be a special meeting called for that purpose.

NORTHWEST COMMUNITY ACTION, INC.
PERSONNEL POLICIES AND PROCEDURES
REVISED AND UPDATED November 1, 2017

ARTICLE IV - CLASSES OF EMPLOYEES

Section 4.1 - General

All positions will be classified as full time, part time, or temporary, exempt or nonexempt.

Section 4.2 - Definition of Full/Part Time Employment

- A. Full-Time
Those employees who are projected to work a forty (40) hour week, 52 weeks per year.
- B. Part-Time
 - 1. Category "A"
Those employees assigned to work a forty (40) hour week but for a period less than 52 weeks per year.
 - 2. Category "B"
Those employees assigned to work less than forty (40) hours per week and who are projected to work 52 weeks per year.

Section 4.3 - Temporary Positions

Those employees who are assigned to work less than forty (40) hours per week and who are projected to work less than 52 weeks per year.

Section 4.4 - Exempt and Nonexempt Positions

Not all employees are affected by the Fair Labor Standards Act. Certain employees are not covered by the Act, other employees, while covered by the Fair Labor Standards Act, are exempted by specific provisions of the Act (exempt employees). A person hired for a position will be classified as exempt or nonexempt from overtime pay provisions. Exempt positions will meet one of the following tests as defined by the Minnesota Wage and Hour Act and the Federal Fair Labors Standards Act by either the long or the short test (29 USC 213).

- 1) EXECUTIVE
- 2) ADMINISTRATIVE
- 3) PROFESSIONAL

All positions not meeting one of these tests will be considered nonexempt. See attachment 1 for Exempt Status tests.

Exempt employees will be paid to do the job on a monthly salary. The monthly salary will be broken down to hourly rates for ease of bookkeeping and data management. The Executive Director shall determine the classification of all employees. All employees shall be notified of their class of employment and exempt or nonexempt status at the time of employment. In case of a dispute the Executive Committee shall have final authority to determine the class of employment for a position.

NORTHWEST COMMUNITY ACTION, INC.
PERSONNEL POLICIES AND PROCEDURES
REVISED AND UPDATED November 1, 2017

ARTICLE V - PROBATION

Section 5.1 - Probation Period

All new employees shall be subject to a six (6) month probationary period. As this period is one of mutual trial for both the employee and NWCA, no notice or reason need be given for termination.

Probationary employees will earn both vacation and sick leave at the regular rates beginning with their initial employment.

Employment following the probationary period will be dependent upon the decision of the Executive Director and the Program Director.

NORTHWEST COMMUNITY ACTION, INC.
PERSONNEL POLICIES AND PROCEDURES
REVISED AND UPDATED November 1, 2017

ARTICLE VI - WORKING CONDITIONS

- A. Northwest Community Action, Inc. recognizes forty (40) hours as a normal work week. The Executive Director, upon consultation with supervisory personnel and with approval of the Board of Directors, will determine operational days and hours of work, or the modification thereof. Unless otherwise assigned, the normal days and hours of work for employees will be as follows:
1. Workday - for full time positions shall be eight (8) hours, exception unpaid meals periods, between the hours of 8:00 a.m. and 4:30 p.m.
 2. Workweek - for full time positions will consist of forty (40) hours between 12:01 a.m. Monday and 12:00 midnight Sunday.
 3. Work Schedules - will be established for each employee by supervisory personnel who may change such schedules based on the needs and requirements of the work unit operation. Supervisory personnel may also require an employee to work an unscheduled day in place of a scheduled day within the same workweek, in which case the unscheduled day worked shall be treated as a modified work schedule and not subject to overtime compensation on the basis of a changed work day.
- B. Office Hours and Breaks
All employees are eligible for a fifteen (15) minute morning and afternoon break. A one-half (1/2) hour lunch break is allowed but is not included as time paid. All staff will arrange morning, noon, and afternoon breaks so as not to interfere with the work of the Agency. Any variations from this schedule must have prior approval from immediate supervisor.
- C. Employees are asked to minimize the use of personal cell phones in the workplace.
- D. Use of the Organization's computers and electronic communications technologies is for program and business activities of NWCA. These resources shall be used in an honest, ethical, legal manner that conforms to applicable license agreements, contracts, and policies regarding their intended use. Although incidental and occasional personal use of the Organization's communications systems are permitted, users automatically waive any rights to privacy.
1. Users agree to take reasonable precautions to protect computers and electronic technologies from loss or theft by storing them in secure locations.
 2. All hardware (laptops, computers, monitors, mice, keyboard, tablets, printers, telephone, fax machines, etc.) issued by NWCA is the property of the Agency and should be treated as such. Users may not physically alter or attempt repairs on any hardware at any time. Users must report any problems with hardware to the Administrative/Technical Support Assistant and their supervisor.
 - a. Users are responsible for safeguarding their login passwords. Passwords may not be shared, printed, or stored online. If a user suspects that the secrecy of their password has been compromised they should report this to the Administrative/Technical Support Assistant immediately and initiate a password change request.
 - b. Employees should exercise care in the use of e-mail and in the handling of e-mail attachments. If an e-mail is from someone you do not know, or if you were not expecting an attachment, do not open it (delete it). The user should contact the Administrative/Technical Support Assistant for assistance if there are questions as to the validity of the message and attachment.
 - c. Users are prohibited from disabling or altering the configuration of the anti-virus software. Users are also required to report any suspicious activity on their computers to the Administrative/Technical Support Assistant. This activity includes but is not limited to: cursor or mouse moving on its own, uncharacteristically slow performance, a change in behavior of the system, etc.

NORTHWEST COMMUNITY ACTION, INC.
PERSONNEL POLICIES AND PROCEDURES

REVISED AND UPDATED November 1, 2017

- d. The installation of new software without the prior approval of the Administrative/Technical Support Assistant is prohibited. If an employee desires to install any new programs, permission should first be obtained. Software should not be downloaded from the Internet. This is a common mechanism for the introduction of computer viruses. If Internet-based software is needed, the Administrative/Technical Support Assistant should be contracted to perform the download and testing of the application prior to installation.
- e. Other prohibited uses of the organization's communications system include by are not limited to:
 - 1. Engaging in any communication that is discriminatory, defamatory, pornographic, obscene, racist, and sexist or that evidences religious bias, or is otherwise of a derogatory nature toward any specific person, or toward any race, nationality, gender, marital status, sexual orientation, religion, disability, physical characteristic, or age group.
 - 2. Browsing, downloading, forwarding and/or printing pornographic, profane, discriminator, threatening or otherwise offensive material from any source including, but not limited to the Internet.
 - 3. Engaging in any communication that is violation of Federal, state or local laws.
 - 4. Proselytizing or promoting religious beliefs or tenets.
 - 5. Campaigning for or against any candidate for political office or any ballot proposal or issue.
 - 6. Sending, forwarding, distributing or replying to "chain letters".
 - 7. Using unauthorized passwords to gain access to another user's information or communication on the Agency's systems or elsewhere.
 - 8. Advertising, solicitation or other commercial, non-programmatic use.
 - 9. Knowingly introducing a computer virus into the communications systems or otherwise knowingly causing damage to the systems.
 - 10. Using the systems in a manner that interferes with normal business functions in any way, including but not limited to: stock tickers, Internet gaming, installing unauthorized software, etc.
 - 11. Excessive personal use of technologies that preempts any business activity or interfered with organizational productivity.
 - 12. Sending email messages under an assumed name or obscuring the origin of an email message sent or received.
- f. Suspected violation of these policies should be immediately and confidentially reported to the immediate supervisor or Executive Director.
- g. NWCA reserves the right to install programs that monitor employee use of the Internet and electronic communications systems, and to act on any violation of these policies found through the use of such programs. NWCA further reserves the right to examine any and all electronic communications sent or received by employees via the Agency's electronic communication systems.

NORTHWEST COMMUNITY ACTION, INC.
PERSONNEL POLICIES AND PROCEDURES
REVISED AND UPDATED November 1, 2017

ARTICLE VII - JOB DESCRIPTIONS

Individual job descriptions shall be made available for all staff positions.

NORTHWEST COMMUNITY ACTION, INC.
PERSONNEL POLICIES AND PROCEDURES
REVISED AND UPDATED November 1, 2017

ARTICLE VIII - EVALUATIONS

Written job evaluations shall be conducted annually. When commenting on an employee's overall performance during the evaluation period, supervisors may consider additional factors such as: experience and training of the employee, and individual productivity. Any employee dissatisfied with the evaluation may note that dissatisfaction in writing and have it attached to the evaluation and submitted to the Executive Director.

Any employee whose work does not merit a satisfactory evaluation may be placed on probation for a period not to exceed ninety (90) days. This probation must include written notification to the employee of the probation as well as steps to be taken to get off probation. During the time of probation, the employee is to be given every opportunity, including intensive supervision, to bring the performance up to levels of acceptable standards. Failure to improve will result in termination. An employee who improves satisfactorily must be so informed, in writing, at the end of the probationary period. A performance evaluation shall be completed at the end of the probationary period.

NORTHWEST COMMUNITY ACTION, INC.
PERSONNEL POLICIES AND PROCEDURES
REVISED AND UPDATED November 1, 2017

ARTICLE IX - DATA PRIVACY

Section 9.1 - Philosophy

Northwest Community Action, Inc. employees and board members shall adhere to the provisions of the Agency's Data Privacy Policies and procedures enacted by State or Federal Government.

All information about individuals, families or organizations served by NWCA is confidential. No information may be shared with any person or organization outside NWCA without the prior written, or verbal in crisis situations, approval of the individual, family or organization.

Section 9.2 - Personnel Files

- A. Employee personnel file shall contain appropriate personnel information such as: application for employment, resume, reference letters, evaluation results, disciplinary action, etc. These records and information contained in them fall under two different classifications of data; public and private.
1. Public Data - Sixteen (16) items about every employee are public information:
 - a. Name
 - b. Education & Training
 - c. Work History
 - d. Veteran Status
 - e. Test Scores
 - f. Rank on Eligibility Tests
 - g. Work Availability
 - h. Current Salary
 - i. Fringe Benefits
 - j. Other remuneration beyond salary (including expense reimbursement)
 - k. Job Title
 - l. Job Description
 - m. Dates of First & Last Employment
 - n. Status of Complaint(s) against Employee
 - o. Whether such complaint(s) eventuated in disciplinary action
 - p. Final disposition of such complaints
 2. Private Data
All other personnel data (including but not limited to, birth date, social security number, gender, race, home address, and telephone number) are private.
- B. The following material will be kept in each employee's personnel file.
1. Employee application or resume
 2. Professional credentials where applicable
 3. Job description
 4. Documentation of salary history while employed by the Agency
 5. Personnel actions
 6. Performance evaluations
 7. Awards
 8. Adverse actions
 9. Dispositions of adverse actions
 10. Required medical information where appropriate

Section 9.3 - Record Retention

- A. All past and present employee personnel records will be reviewed annually in September, the beginning of each program year. Material no longer relevant will be removed from the file.
1. Performance appraisals, positive or negative, will be retained for seven (7) years. All performance appraisals over seven (7) years old will be removed.
 2. Personnel files of employees voluntarily or involuntarily terminated of seven (7) years ago will be destroyed.

NORTHWEST COMMUNITY ACTION, INC.
PERSONNEL POLICIES AND PROCEDURES
REVISED AND UPDATED November 1, 2017

- B. At no time will any employee of NWCA collect data on or maintain a private file on any employee of NWCA; only exception being that Supervisors may maintain a working file in regards to employee evaluation.

Section 9.4 - Authorization

- A. All performance appraisals/evaluations must be signed and dated by the supervisor before incorporation into the employee's personnel files.
- B. Employees must receive a copy of any disciplinary notices incorporated into their personnel files and must be told whether those notices will be added to their personnel files.

Section 9.5 - Security

- A. Personnel files are stored in a locked cabinet at NWCA Main Office. The Administrative Assistant/Human Resource is responsible for the security of the personnel file.
- B. Participant files are stored in locked cabinets located near the employees responsible for their respective programs. Cabinets are unlocked at the beginning of the work day and locked at the end of the work day. Program Directors are responsible for assigning person(s) responsible for the program file - its contents, internal and external access, and security.

Section 9.6 - Access to Employee Information

- A. Information contained in NWCA personnel files is, with few exceptions, public in nature. As such, State statute requires that these records be maintained in a fashion that will allow - with appropriate supervision and during reasonable hours - public inspection. Given this legal status, the issue of access control becomes largely a matter of policy making that is best divided into three categories.
 - 1. Individual Access
 - a. All Agency employees have the right to inspect and verify the accuracy of their personnel files during normal working hours, Monday through Friday, by contacting the Administrative Assistant/Human Resources. Under no circumstances should personnel files ever leave the office.
 - b. Employees have the right to an appropriate explanation of the contents and meaning of those records.
 - c. Employees desiring access to their personnel file who are unknown to the Administrative Assistant/Human Resources may be required to provide identification.
 - 2. Administrative and Managerial Access
 - a. The Executive Director, Fiscal Director and Administrative Assistant/Human Resources have complete access to the personnel file for business purposes - personnel administration, staff management, and disciplinary action.
 - b. Beyond administrative requirements, information to Program Directors will be limited to that directly related to work performance and employment decisions. All other employee information, such as benefits, payroll deductions, etc. have no value in supervisory matters and will not be accessible.
 - c. Access to specific data may be granted by the Fiscal Director to other Agency employees if a definite business need is demonstrated.
 - d. All employees of NWCA are expected NOT to discuss confidential information pertaining to Agency employees or participants, outside the

NORTHWEST COMMUNITY ACTION, INC.
PERSONNEL POLICIES AND PROCEDURES
REVISED AND UPDATED November 1, 2017

scope of their employment. A breach of this provision may be cause for disciplinary action

3. External Requests for Employee Information

The Agency's policy on processing external requests for employee data and procedures used in gathering information for its own files:

- a. Employee data will not be released by telephone. Organization(s) requesting such information will be instructed to submit their request under letterhead stating the purpose for which the data will be used with written authorization from the responsible organizational authority.
- b. Only that information classified PUBLIC by Minnesota Statute 15.1692 will be released without additional authorization from the individual about whom the request is being made. Information deemed private will not be provided without written authorization from the employee. Obtaining such authorization is the responsibility of the individual requesting the information.
- c. Beyond the stipulation of point 3.b, the only types of data that will be released under any circumstances are those objective, factual data which have hard copy documentation. Specifically, personal opinions, work appraisals, and personality analyses, where they exist, will never be released.
- d. Every personnel file will include a data release log that will contain the date of each information request or employment validation, the name of the requesting authority, and the actual information that was released.

Section 9.7 - Contesting Accuracy

- A. All employees have the right to contest the accuracy or completeness of information stored on them with this Agency, upon written request. That request must include both identification of the incorrect or incomplete information and the employee's suggested correction or addition. Employees will be informed within thirty (30) days of the Agency's disposition of their request. Information determined to be incorrect or incomplete will be corrected.
- B. Employees have the right to appeal an adverse determination of their request for correction of information stored with this Agency. Information an employee still believes to be incomplete or incorrect MAY NOT be disclosed by this Agency without inclusion of the employee's statement of disagreement.

Section 9.8 - Staff Education

- A. All Program Directors will be informed of data privacy regulation changes on an on-going basis. Program Directors are expected to share this information with their subordinates.
- B. In-house training sessions will be held as needed.

NORTHWEST COMMUNITY ACTION, INC.
PERSONNEL POLICIES AND PROCEDURES
REVISED AND UPDATED November 1, 2017

ARTICLE X-STAFF AND SPECIAL MEETINGS

Regular and special staff meeting shall be held for general discussion of project activities, financial reporting, and directives of future activities. Attendance requirements shall be posted or delivered where applicable.

NORTHWEST COMMUNITY ACTION, INC.
PERSONNEL POLICIES AND PROCEDURES
REVISED AND UPDATED November 1, 2017

ARTICLE XI - SALARIES AND PROMOTIONS

Section 11.1

Federal and State minimum wage laws concerning salaries shall be adhered to.

Section 11.2

The Board of Directors shall set the initial salary and increment of the Executive Director.

Section 11.3

Initial salaries and increments of the Program Directors and administrative staff, other than the Executive Director, shall be determined by the appropriate Executive Board Committee, or the Executive Director, or when applicable the appropriate Program Advisory Committee.

Section 11.4

Initial salaries and increments of all other program staff shall be determined by the Executive Director, appropriate Program Director, and when applicable, the appropriate Program Advisory Committee.

Section 11.5 - Overtime

Nonexempt Employees

For those NWCA employees who are classified as nonexempt under Section 4.4 of these policies, NWCA will reimburse these employees at a rate of 1 2 their hourly rate of pay for more than forty (40) hours in one (1) work week.

Nonexempt employees may not work more than forty (40) hours in one (1) work week without prior authorization from the Program and Executive Director.

Every attempt shall be made by the employees and their supervisor to schedule the employee's work load so that the employee will not work more than forty (40) hours in one (1) week.

If a nonexempt employee is required to work more than eight (8) hours in one (1) day, the Program Director should make every effort to revise the employee's work schedule for the rest of the week to conform to a forty (40) hour work week.

Overtime pay cannot be accumulated from one pay period to the next pay period.

Section 11.6 - Payroll

Payroll shall be prepared semi-monthly. Payroll pay periods shall be the 1st - 15th and the 16th - the last day of each month.

Personnel activity sheets must be submitted semi-monthly.

Personnel activity sheets must be received by 10:00 A.M. the next working day following the pay period and approved personnel activity sheets must be received by the fiscal department by noon that day. Checks/direct deposit will be processed and mailed on the third working day following the pay period.

These personnel activity sheets must be correct, legible, and complete or they will be returned to the Program Department Head and will not be processed until the following pay period, unless otherwise authorized by the Executive Director. Late personnel activity reports shall not be paid until the next pay period; this condition may be waived by the Executive Director at his/her discretion.

NORTHWEST COMMUNITY ACTION, INC.
PERSONNEL POLICIES AND PROCEDURES
REVISED AND UPDATED November 1, 2017

Section 11.7 - Assignments of Wages and Wage Garnishments

State and federal authorities may cause a legal summons or court order to be severed at an employee's work location to garnish the employee's salary to satisfy payment of taxes, delinquencies from other creditors, or child support and maintenance enforcement. Northwest Community Action, Inc. shall make the appropriate deductions and arrange for payment to the garnishing agency until the garnishment is satisfied.

NORTHWEST COMMUNITY ACTION, INC.
PERSONNEL POLICIES AND PROCEDURES
REVISED AND UPDATED November 1, 2017

ARTICLE XII - TERMINATION OF EMPLOYMENT

Section 12.1 - Voluntary Resignation

The Executive Director may terminate his/her employment by submitting a letter of resignation that clearly states his/her reasons for resignation to the Board of Directors. Under optimal circumstances, the incumbent Executive Director is expected to provide the Board of Directors with a minimum of two to four months' notice of his or her retirement or resignation from the position.

The Fiscal Director, Agency Planner, Program Directors, and key program management may terminate his/her employment by submitting a letter of resignation to the Executive Director; if possible a minimum of two months notice is requested.

Other employees may terminate their employment by submitting a letter of resignation to the Executive Director through the supervisor or Program Director; if possible a minimum of two weeks' notice is requested.

Section 12.2 - Involuntary Termination

The Executive Director may terminate any employee with cause as set forth in these Personnel Policies or if the employee is working in a project that is terminated or if the project has a reduction in funding to the extent that it will not justify the employee's continued employment. The above is not applicable to probationary employees who may be terminated for whatever reason during the probationary period.

The Board of Directors, on recommendation of the Executive Committee, may terminate the Executive Director's employment with evidence of the same causes or reason stated above.

NORTHWEST COMMUNITY ACTION, INC.
PERSONNEL POLICIES AND PROCEDURES
REVISED AND UPDATED November 1, 2017

ARTICLE XIII - EMPLOYEE BENEFITS

Section 13.1

All employees shall be covered by FICA, Workers' Compensation, and State Unemployment coverage when applicable.

Section 13.2 - Holidays

A. Full-time Employees

The following holidays, and any other specifically declared by the President or Governor, shall be allowed with pay for full-time staff:

New Year's Day	Independence Day
Martin Luther King Day	Labor Day
President's Day	Veterans' Day
Good Friday	Thanksgiving Day
Memorial Day	Christmas Day

In the event any of the previous listed days fall on a Sunday, the following Monday shall be a paid holiday; when one of these days fall on Saturday, the preceding Friday shall be a paid holiday.

Head Start employees will exchange Veterans' Day for Thanksgiving Friday.

B. Part-time Employees

Part-time employees will be allowed pay for holidays stated in Section 13.2-A. The amount of holiday pay will be pro-rated based on the number of other hours they are being paid in that pay period.

Section 13.3 - Vacation

A. Employees shall accrue vacation at the rate of:

1st - 10th service years	0.050 hour
11th - 15th service years	0.075 hour
16th + service years	0.100 hour

for every hour worked cumulative to 240 hours.

B. General

Vacation benefits shall be effective after completion of twelve (12) months of employment, retroactive to the beginning date of employment. At the discretion of the Executive or Program Director this condition may be waived.

No vacations will be taken that will interfere with the operation of the program. Requests for vacations must have prior approval by the Program or Executive Director.

C. Employees who are scheduled to work less than 52 weeks per year shall have unused vacation paid off in full the first working day following the first payroll of each year.

Section 13.4 - Sick Leave

It is the policy of Northwest Community Action, Inc. that sick leave is a privilege and not a right of employees. Sick leave should therefore be used only when necessary and only to cover illness.

An employee who is unable to report for work because of illness shall notify his/her supervisor within the first two (2) hours of business, in the first full day of absence.

NORTHWEST COMMUNITY ACTION, INC.
PERSONNEL POLICIES AND PROCEDURES

REVISED AND UPDATED November 1, 2017

- A. Employees shall accrue sick leave at the rate of 0.050 hour for every hour worked cumulative to 960 hours.
- B. General
Sick leave days are used to compensate the employee for absences as a result of illness (either personal or a member of the employee's immediate family). Medical and dental appointments that must be made during working hours must be approved by the Program Director and must be charged against accrued sick leave.
- A doctor's statement will be required if more than five (5) consecutive days of absence occur.
- In the case of termination of employment, for any reason, unused sick leave will be stricken from the records with no financial reimbursement or any other consideration.
- C. Paid maternity leave under this section shall be limited to the number of accrued sick and vacation days.
- D. Paying of accrued sick time to employees receiving workers' compensation will be limited to the difference of workers' compensation and gross salary at regular rate of pay.

Section 13.5 - Funeral Leave

Funeral leave up to three (3) days with pay may be granted an employee in the event of death in the immediate family. Immediate family shall be defined as spouse/partner, children, brothers, sisters, parents, or grandparents, of either the employee or spouse/partner. Funeral leave must be approved by the Executive Director or Program Director.

Section 13.6 - Inclement Weather

Employee absent from work due to inclement weather may have the option of the following:

- Make up time,
- Take vacation leave,
- Take personal leave, or
- Loss of pay.

Section 13.7 - Health Insurance

- A. Group Health Insurance – General
1. Employees shall become eligible the 1st of the month following the completion of the health insurance probationary period of 30 days.
 2. When an employee is on sick leave, the paying of health insurance shall be limited to the maximum sick leave days accrued.
 3. When an employee is laid off, the employee must assume the total cost of the insurance premiums if they wish the coverage to continue.
- B. Full-time employees
1. Group health insurance shall be available for persons hired on a full- time basis. The Agency shall pay a maximum of \$1,100/month towards the cost of a single or family contract.
- C. Part-Time Employees
1. Group health insurance shall be available for persons who work a minimum of 1,248 hours a year. Hours will be projected for the period of August 1 thru July

NORTHWEST COMMUNITY ACTION, INC.
PERSONNEL POLICIES AND PROCEDURES
REVISED AND UPDATED November 1, 2017

31. The cost of a single contract shall be pro-rated by percentage of time worked on a yearly basis (i.e: 1,248 hours a year equals 60% time). Part-time employees may purchase a family contract, however, they will be responsible to pay the difference between single coverage and a family policy.

Section 13.8 - Jury Duty

Time off will be granted for jury duty. Jury duty pay must be endorsed over to the agency to receive regular pay or keep jury duty pay. However, employees are expected to report to work when on call and not required in court.

Section 13.9 - Military Leave

Any employee presenting written official order requiring the employee's attendance for a period of training or other active duty as a member of the United States Armed Forces, State Reserve Corps, or State Guard, will be entitled to military leave for a period of fifteen (15) days in any calendar year without pay. If leave exceeds fifteen (15) days, employee shall present a request to the Board of Directors.

Section 13.10 - Maternity/Paternity or Adoption Leave

Maternity/Paternity or Adoption leaves of absence shall be granted to a natural parent(s) or adoptive parent(s) who is a permanent employee and who requests such leave in conjunction with the birth or adoption of a child. Requests for adoption leave shall be submitted 30 days in advance, if possible. Requests for Maternity/Paternity leave shall be submitted at least 30 days in advance of the anticipated due date if possible. Maternity/Paternity leave shall commence on the date requested by the employee, and shall continue up to twelve (12) weeks. Requests for over six (6) weeks of leave require a doctor's statement. Such leave may be extended up to a maximum of six (6) months by mutual consent between the employee and Program Director, and final approval from Executive Director. Paid leave under this section shall be limited to the number or accrued sick and vacation days.

Section 13.11 - Tax Sheltered Annuity

A Tax Shelter Annuity/Retirement Plan shall be available for eligible employees to make elective deferrals upon the date of hire, and reaching your "entry date" as per the Plan. Eligible employees must work a minimum of 20 hours per week and meet all Plan requirements. Upon completion of six months employment, the Agency shall contribute one dollar (\$1.00) for every dollar of a participant's elective deferral, up to a maximum of four percent (4%) of each participant's annual wage compensation. The minimum amount an employee can elect to defer is one percent (1%) of his/her wage compensation. All contributions made to the Tax Sheltered Annuity on an employee's behalf, and the earnings on those amounts, are fully vested when they are contributed. NWCA, Inc. does not in any way guarantee a participant's annuity contract, or custodial account, from loss or depreciation.

Section 13.12 - Personal Leave

Full-Time employees may be granted up to 2 days personal leave per calendar year based on payroll check dates. Personal leave may be used to take care of personal business, absences due to inclement weather, or emergencies. Personal leave will be deducted from accumulated sick leave. Prior approval must be obtained from the employee's supervisor or appropriate administrative personnel.

NORTHWEST COMMUNITY ACTION, INC.
PERSONNEL POLICIES AND PROCEDURES
REVISED AND UPDATED November 1, 2017

Section 13.13 - Employee Life Insurance

- A. Full-time employees
Group employee life insurance shall be available for persons hired on a full-time basis. The Agency shall pay the cost of the contract. When a full-time employee is on sick leave, the paying of employee life insurance shall be limited to the maximum sick leave days accrued.
- B. Part-time employees
Group employee life insurance shall be available for persons who work a minimum of 1,248 hours a year. Hours will be projected for the period of August 1 thru July 31. The Agency shall pay the cost of the contract. When a part-time employee is on sick leave, the paying of employee life insurance shall be limited to maximum sick leave days accrued. When part-time employees are laid off, the employee must assume the total cost of the insurance premium if they wish the coverage to continue.
- C. Other employees
Group employee life insurance must be offered to all employees of NWCA. Payments must be made by the employee in advance if said employee does not qualify for coverage as specified above.

Section 13.14 - Continuation of Benefits

Under federal law (COBRA), Northwest Community Action, Inc. must offer to continue medical and life insurance coverage to all group plan participants who have lost these benefits for any reason other than discharge due to "gross misconduct". The offer of coverage is extended by letter from the Agency at the time the benefits are lost or shortly thereafter. Coverage is continued under COBRA for a maximum of 18 months from termination. If the covered individual is disabled, coverage may continue for an additional 11 months for a total of 29 months. The premiums for continued coverage are paid by the participants to the Agency. If the benefits cease as a result of termination, the employee enrolls all family members previously covered. However, where benefits cease because of the death of the employee, divorce, or loss of dependent coverage, each eligible beneficiary may make a separate election for a maximum of 36 months.

Employees who have been laid off but are subject to recall should notify the Fiscal Department within five (5) calendar days of their lay off should they desire to continue their insurance benefits. In this instance, said employees must make insurance premium payments to Northwest Community Action, Inc.

NORTHWEST COMMUNITY ACTION, INC.
PERSONNEL POLICIES AND PROCEDURES
REVISED AND UPDATED November 1, 2017

ARTICLE XIV - EMPLOYEE RELATION/HEALTH AND WELFARE COSTS

Northwest Community Action, Inc. operates a number of Federal, State - and, local grant programs. Participants of these various program - and, the community as a whole - can best benefit from the efforts of our organization if all of our employees - no matter in what program they may be working - feel an integral part of one, cohesive organization whose purpose is to serve our particular participants and our community.

To ensure this corporate identity and to promote an attractive workplace and a motivated group of helpful employees, this corporation has established the following policy to enhance -to the greatest extent practical – Employer/employee relations/health and welfare.

The following actions and activities may be available to increase the dedication of employees to Northwest Community Action, Inc. and to their work with our various groups of participants:

- Annual organization-wide picnics and/or retreats,
- Luncheons,
- Employee information publications,
- Coffee/water/other non-alcoholic beverages,
- Flowers/fruit baskets sent in cases of employee/director sickness, special event, or, a death in an employee/director's family,
- Gifts/awards for employee.

All costs will be equitable apportioned to all of the corporation's grants, programs, contracts and activities.

If there is income generated from any of these activities - because of user's fee; or, partial payments by employees - it will be used to offset expenses

The costs of a program of this sort are specifically allowed for non-Federal entities by OMB Circular 200 Part 200.437.

NORTHWEST COMMUNITY ACTION, INC.
PERSONNEL POLICIES AND PROCEDURES
REVISED AND UPDATED November 1, 2017

ARTICLE XV - EMPLOYEE CONDUCT

Section 15.1 - Personal Appearance

All employees have contact with the public and therefore represent the Agency in their appearance, as well as their actions. The personal appearance of all employees is to be governed by the following standards:

1. Clothing shall be appropriate to the work station;
2. Clothing shall be clean; and
3. Clothing shall be neat.

Section 15.2 - Drug-Free Workplace Policy

Northwest Community Action, Inc. recognizes the value of having a drug-free workplace and in conjunction with Drug-Free Workplace Act of 1988 adopts the following policy. This policy applies to all of our employees, subcontractors, and volunteers.

1. The unlawful manufacture, distribution, dispensation, possession or use of a controlled substance is prohibited in the workplace. For the purposes of this section, the term "controlled substance": is defined as a controlled substance which appears in Schedules I through V of Section 202 of the Controlled Substances Act (21 USC 812).
2. A violation of this drug-free policy constitutes "just cause" for disciplinary action, up to and including immediate suspension and/or termination.
3. As a condition of employment, employees will abide by the terms of this drug-free policy and will notify their program director of any criminal drug statute conviction for which a violation occurs in the workplace within five (5) calendar days after such conviction.
4. Within thirty (30) calendar days of receiving notice from an employee of a drug related workplace conviction; NWCA may require an employee to satisfactorily participate in a drug abuse assistance or an appropriate rehabilitation program.
5. Northwest Community Action, Inc. will establish a drug free awareness program to inform employees about:
 - a. The dangers of drug abuse in the workplace.
 - b. The policy of maintaining a drug-free workplace.
 - c. The availability of drug counseling, rehabilitation, and employee assistance programs.
 - d. The penalties that may be imposed upon employees for drug abuse violations.
6. Each situation will be evaluated on a case-by-case basis depending upon the severity and circumstances.
7. Northwest Community Action, Inc. will make a good faith effort to continue a drug-free workplace through implementation of this policy.
8. Northwest Community Action, Inc. prohibits all employees, subcontractors, and volunteers from abusing prescription medication or being in any manner under the influence of a chemical that impairs the individual's ability to provide services or care, when directly responsible for persons served.

Section 15.3 - No Smoking Policy

The Central and Head Start offices of Northwest Community Action shall be smoke free.

NORTHWEST COMMUNITY ACTION, INC.
PERSONNEL POLICIES AND PROCEDURES
REVISED AND UPDATED November 1, 2017

ARTICLE XVI - REIMBURSEMENT FOR EMPLOYMENT AND BOARD EXPENSES

Section 16.1 - Definition

Travel costs are expenses for transportation, lodging, subsistence, and related items incurred by employees who are in travel status on official business of the Agency. Travel costs are allowable when they are directly attributable to specific work under an award or are incurred in the normal course of administration of the Agency. NWCA will pay travel costs to personnel for authorized purposes only.

All employees whose jobs require them to drive their personal cars on Agency business will be required to possess a valid driver's license and to demonstrate proof of automobile insurance coverage in accordance with minimum liability coverage as established by the State of Minnesota annually.

Section 16.2 - Reimbursement Rates

The traveler shall be placed in an actual subsistence expense status and shall be reimbursed for the actual and necessary expenses incurred with the following conditions:

- A. Lodging
All lodging accommodations must be receipted. Travelers should stay in standard rooms. Suites and other upgraded rooms at hotels shall not be allowed, unless required by a medical condition. Ask hotels for any available discounts – nonprofit, government or corporate rates.
- B. Meals
Meals will be reimbursed, at the actual expense, only when the employee is away from the Agency geographical duty area during normal meal hours. Cost of meals included in a conference or participation fee are not eligible for reimbursement.
 - 1. Breakfast reimbursements may be claimed if the employee leaves his/her duty station before 6:00 a.m. or is away from home overnight with maximum reimbursement of \$9.00.
 - 2. Lunch reimbursements may be claimed if the employee is in travel status or is away from home overnight with maximum reimbursement of \$11.00.
 - 3. Dinner reimbursements may be claimed only if the employee is away from his/her duty station until after 7:00 p.m. or is away from home overnight with a maximum reimbursement of \$16.00.
- C. Transportation
 - 1. Air Travel
Air travel should be at coach class or the lowest commercial discount fare at the time the ticket is purchased except when this fare would:
 - a. Require circuitous routing
 - b. Require travel during unreasonable hours
 - c. Excessively prolong travel
 - d. Result in additional costs that would offset the transportation savings, or
 - e. Offer accommodations not reasonably adequate for the traveler's medical needs.

The cost of baggage fees required by airlines to either check or carry-on luggage is allowed.

NORTHWEST COMMUNITY ACTION, INC.
PERSONNEL POLICIES AND PROCEDURES
REVISED AND UPDATED November 1, 2017

All air travel and cost of baggage fees shall be receipted.

When an employee chooses privately owned conveyance in lieu of air travel, the employee will be reimbursed at the rate set by NWCA Board of Directors not to exceed the rate of the coach status air fare.

2. Mileage

Mileage will be paid at a rate set by NWCA Board of Directors from the designated duty station to the point of destination and return. Payments will be made from standard mileage distances as shown on state transportation maps, or as established through past experience and performance.

3. Rental Cars

When utilizing rental cars, travelers should rent midsize or smaller vehicles unless safety considerations require a larger vehicle. Rental of a vehicle larger than midsize must be approved by a supervisor. Rental cards should be shared whenever possible.

4. Other costs

Other costs, such as cab fare, parking, and tolls shall be reimbursed on an actual cost basis. A receipt shall be required for any cab fare exceeding \$10 per incident. A receipt shall be required for parking and tolls for each incident exceeding \$5. Employees are encouraged to maintain a log book for other costs incurred.

D. Travel Advances

Funds for out-of-area travel may be advanced when properly requested and authorized. Such advances should be made only when absolutely necessary. When exact costs are unknown, the amount advanced should be based upon prudent estimates. Travel advances are recorded in the fiscal records as accounts receivable and must be deducted from actual expenses subsequently reported on the travel voucher. Travel advances will not be issued for less than \$50.

Section 16.3 - Reporting of Travel Expenditures

- A. Grantee travelers will always have their out of service area travel authorized in advance.
- B. Travel vouchers must show beginning and ending dates, times, and odometer readings for each trip.
- C. Travel vouchers must include details regarding the points visited and the nature of business at each point.
- D. Lodging receipts must be furnished from commercial hotels or motels; receipts from private individuals are not acceptable.
- E. Receipts must also be furnished for reimbursement of any other official expenses, such as air fare, tax, telephone, etc.
- F. Travel vouchers must be signed by the traveler and submitted in a timely manner and only one expense form should be prepared for each trip.

NORTHWEST COMMUNITY ACTION, INC.
PERSONNEL POLICIES AND PROCEDURES

REVISED AND UPDATED November 1, 2017

- G. Incomplete or incorrect travel vouchers will be returned to the supervisors. Late travel vouchers will be held until the following pay period. Expense reports older than one month will not be reimbursed.

Section 16.4 - Beneficiary and Board Expenses

- A. The individual incurring expenses while carrying out duties for the Agency will complete, sign, and date the reimbursement voucher.
- B. The reimbursement voucher will be signed by the individual in charge of the meeting.
- C. The Board of Directors and Head Start Policy Council will be reimbursed up to \$40/month for connectivity expense. Presentation of a copy of their one month bill for telephone (land and/or cell) and internet annually is required.

Section 16.5 - Interviewing and Moving Expenses

Northwest Community Action, Inc. makes no provision for reimbursing interviewing and moving expenses.

Section 16.6 - Reimbursement of Field Purchases

If a field purchase is to be reimbursed to employee, invoices must be submitted within 30 days of month of purchase. Invoices not submitted within 30 days of month of purchase will not be reimbursed.

The field purchase must be:

- Budgeted,
- Allowable under the grant,
- Necessary to the program,
- Less than \$500, and
- Authorized by the Program Director.

NORTHWEST COMMUNITY ACTION, INC.
PERSONNEL POLICIES AND PROCEDURES
REVISED AND UPDATED November 1, 2017

ARTICLE XVII - POLICY FOR AGENCY/HEAD START VEHICLES

No smoking in vehicles when hauling children - includes parents.

Absolutely no alcoholic beverages in vehicles and no driving or riding in vehicles when under the influence of alcohol.

Agency/Head Start vehicles are for Agency/Head Start purposes only. No driving vehicles when not on official Agency/Head Start business.

Keep vehicle log up-to-date and turn into the office on the 15th and last day of each month.

Each employee is personally responsible for any fines incurred as a result of driving or parking. Towing expenses for agency vehicles resulting from a breakdown or accident occurring while the vehicle is being used for work purposes may be paid by the agency.

The staff person with the prime responsibility for each vehicle is responsible for maintenance and upkeep.

Report any problems with the vehicles to Executive/Head Start Director immediately.

Those areas not having Agency/Head Start vehicles should plan alternative means of transportation for field trips, workshops, etc. If the van is needed, the Home Visitors/Staff should call in two (2) weeks in advance to check on its availability.

Those staff with vehicles will not be paid mileage unless prior approval is granted from the Head Start Director.

Drivers and all passengers must be in seat belts when riding in cars used for Agency/Head Start activities, including privately owned vehicles.

Vehicle assignments are made with regard to miles traveled/Home Visitor and geographic area.

All drivers must show proof of driver's license and insurability.

NORTHWEST COMMUNITY ACTION, INC.
PERSONNEL POLICIES AND PROCEDURES
REVISED AND UPDATED November 1, 2017

ARTICLE XVIII - DISCIPLINARY ACTIONS

Section 18.1

Discipline may be needed at times for employees. This discipline may need to be exerted for a number of reasons:

1. Failure to adequately perform job duties,
2. Use of poor judgment,
3. Violation of Agency policies,
4. Violation of funding source or Agency guidelines, or
5. Action detrimental to the low income community or the programs of NWCA.

Section 18.2 - Types of discipline

The types of discipline available are as follows:

1. Verbal reprimand (oral reminder),
2. Written reprimand (written reminder),
3. Instatement of a probationary period,
4. Suspension with pay,
5. Suspension without pay, or
6. Dismissal from employment (involuntary termination).

When the problem arises, efforts should be made by the employee's immediate supervisor to help the employee correct the problem.

The type of discipline used depends on the severity of the offense or problem, and/or the number of times it has occurred. Action taken will be reviewed by the Executive Director to ensure the discipline fairly matches the offense.

In all cases of extreme discipline, the appropriate Committee will be informed of the situation and given such background information as is needed. In a case of a formal grievance, the appropriate Council or Committee will review the case and render a decision which will be forwarded to the Board of Directors for final determination.

Section 18.3 - Reasons for disciplinary action

Reasons for disciplinary action, including discharge, may include, but are not limited to:

1. Abuse of sick leave,
2. A criminal act,
3. Violations of Affirmative Action Policies,
4. Deliberate falsification of records,
5. Insubordination,
6. Sexual Harassment,
7. Stealing,
8. Fighting on the job,
9. Repeated tardiness and absenteeism,
10. Neglect or failure to perform assigned duties,
11. Improper use of or damage to Agency property or that of another employee,
12. Repeated violation of safety rules,
13. Doing personal work on Agency time,
14. Personal use of Agency vehicles,
15. Failure to follow directive of a supervisor,
16. Any unauthorized leave,

NORTHWEST COMMUNITY ACTION, INC.
PERSONNEL POLICIES AND PROCEDURES

REVISED AND UPDATED November 1, 2017

17. Libelous or slanderous conduct toward NWCA employees or program participants,
18. Improper release of Agency documents,
19. Discourteous treatment of clients, the public, or fellow employees,
20. Violation of any of the provisions of these Personnel Policies,
21. Violation of client confidentiality or the Minnesota Data Privacy Act,
22. Use of mood altering drugs while in the performance of duties,
23. False statements on application for employment and/or resume,
24. Misrepresentation of facts, either orally or in writing,
25. Intentional destruction, abuse, or defacement of NWCA property,
26. Sleeping while on duty, or
27. Any other conduct which demonstrates that the employee is uncooperative or unprofessional and which is considered by their supervisor and next higher authority to have a harmful effect on NWCA or its employees.

NORTHWEST COMMUNITY ACTION, INC.
PERSONNEL POLICIES AND PROCEDURES
REVISED AND UPDATED November 1, 2017

ARTICLE XIX - GRIEVANCE PROCEDURES

Section 19.1

An aggrieved employee shall first present his/her grievance to his/her immediate supervisor within 5 working days of the incident giving rise to the grievance. If the matter is not satisfactorily resolved at that level within 5 working days, the aggrieved employee may appeal in writing to the Executive Director.

Section 19.2

If the grievance is not satisfactorily settled between the employee and the Executive Director the employee may within fifteen (15) days either:

1. Submit a written explanation of his grievance, bearing his/her signature, for the Executive Director to present to the Board of Directors for review and action; or
2. Submit a written signed request to the Executive Director for a personal hearing before the Board of Directors.

Section 19.3

The grievance shall be considered by the Board of Directors at the first regularly scheduled meeting, following receipt of the written grievance, and/or request for personal hearing.

Section 19.4

An aggrieved employee shall be entitled to enlist the help of a representative of their choice to assist them throughout the grievance process.

NORTHWEST COMMUNITY ACTION, INC.
PERSONNEL POLICIES AND PROCEDURES
REVISED AND UPDATED November 1, 2017

ARTICLE XX - OUTSIDE AGENCY EMPLOYMENT POLICY

Section 20.1

Such employment shall not involve a conflict of interest or conflict with the employee's duties.

Section 20.2

Such employment shall not involve the performance of duties which the employee should perform as part of his/her employment.

Section 20.3

Such employment policies shall be enforced by the Executive Director by implementing an "Outside Employment Report Form" within the Agency and enforcing a mandatory reporting policy where applicable.

Section 20.4

Such employment may not occur with any employee whose assignments include being available for evenings or weekends, or during an employee's regular or assigned working hours, unless the employee is on annual leave, leave without pay, or has prior approval by the Executive Director.

NORTHWEST COMMUNITY ACTION, INC.
PERSONNEL POLICIES AND PROCEDURES
REVISED AND UPDATED November 1, 2017

ARTICLE XXI - EMPLOYEE ORIENTATION POLICY

Section 21.1

Prior to assuming their duties, all new employees will be given orientation concerning the Agency's Personnel Policies and Procedures.

Each new employee will be given a copy of the Personnel Policies and Procedures. It will be the employee's responsibility to read and become familiar with its contents. All new employees must sign a form verifying that they received and read the Personnel Policies and Procedures.

Present employees will receive updated and current amendments.

NORTHWEST COMMUNITY ACTION, INC.
PERSONNEL POLICIES AND PROCEDURES
REVISED AND UPDATED November 1, 2017

ARTICLE XXII - TRAINING AND CAREER DEVELOPMENT

Section 22.1

The Head Start program will provide its employees with an opportunity for career development and advancement. Head Start staff will be provided an opportunity for training to develop professional credentials (resources available) through:

1. Pre-Service and In-Service Training
2. Child Development Associate (CDA)
3. Credit-Based Training through Bemidji State University
4. Attendance at meetings, conferences, etc. relative to their job training will be directed at upgrading skills and competencies for delivering services to Head Start children and their families.

NORTHWEST COMMUNITY ACTION, INC.
PERSONNEL POLICIES AND PROCEDURES
REVISED AND UPDATED November 1, 2017

ARTICLE XXIII - SEXUAL ANTI-HARASSMENT POLICY

It is the policy of Northwest Community Action that all of our employees should be able to enjoy a work environment free of discrimination and harassment.

The policy refers to, but is not limited to, harassment in the following areas: (1) age, (2) race, (3) color, (4) national origin, (5) religion, (6) sex, (7) sexual orientation, (8) marital status, (9) handicap, and (10) veteran status. Harassment includes display or circulation of written materials or pictures degrading to either gender or to racial, ethnic, or religious groups; and verbal abuse or insults directed at or made in the presence of members of a racial, ethnic, or minority group.

Harassment also refers to behavior which is personally offensive, impairs morale, and interferes with the work effectiveness of employees. Any harassment of employees by other employees will not be permitted, regardless of their working relationship. Sexual harassment includes unwelcomed sexual advances, requests for sexual favors, and other offensive verbal or physical conduct that is sexual in nature. Sexual harassment undermines the employment relationship by creating any intimidating, hostile, or offensive work environment and will not be tolerated.

In fulfilling their obligation to maintain a positive and productive work environment, manager and supervisors are expected to immediately halt any harassment of which they become aware by emphasizing the company policy and, when necessary, by more direct disciplinary action.

COMPLAINT PROCEDURE

Individuals who believe they have been subjected to harassment from either co-worker or a supervisor should make it clear to the offender that such behavior is offensive and unwelcomed to them and should immediately bring the matter to the attention of the appropriate manager and/or their personnel representative.

Individuals who wish to speak with management personnel other than their supervisor or the personnel representative may request a meeting with the Affirmative Action officer, who will make his/her own independent inquiry into any allegations. All allegations or harassment will be immediately investigated. It is important for employees who feel that they have been harassed to report incidents to management.

Anyone found to have engaged in any type of harassment shall be subject to discipline, up to and including discharge.

NORTHWEST COMMUNITY ACTION, INC.
PERSONNEL POLICIES AND PROCEDURES
REVISED AND UPDATED November 1, 2017

CHILD ABUSE POLICY

Northwest Community Action, Inc. Head Start follows Federal laws, Minnesota Statutes, and Head Start rules governing the reporting of maltreatment of minors. This includes physical abuse, sexual abuse, and neglect as defined under Minnesota Statute 626.556. NWCA also directs strong efforts toward the prevention of child abuse and neglect. Head Start is not or is not to become a primary instrument for the treatment of child abuse and neglect.

NWCA staff must report all suspected or alleged incidents of child abuse and neglect. This is accomplished in the following manner:

1. The individual staff member who suspects child abuse and/or neglect has the responsibility for reporting the case immediately. This includes all staff employed by preschool programs.
2. An oral report of the suspected child abuse/neglect will be made to the local Social Service office or police department. A follow-up written report will be requested by that agency.
3. An oral report must be made within twenty-four (24) hours to the designated person at the Head Start Central Office. The oral report must be followed by a written report which will be kept in a confidential file at the Head Start Office.
4. A staff member designated by the Director will be responsible for maintaining the file and discussing the suspected child abuse/neglect case with the reporter whenever necessary.
5. The report must include the following:
 - a. Child's name,
 - b. Child's address,
 - c. Child's birth date,
 - d. Child's sex,
 - e. Parent/Guardian's name, address, and telephone number,
 - f. The nature and extent of injuries and/or evidence of neglect or molestation,
 - g. Name(s) and address(es) of person(s) suspected of child abuse/neglect,
 - h. Indication as to whether the parent/guardian was notified that a report was being made,
 - i. Name, address, and telephone number of the Head Start program and staff member reporting, and
 - j. The time, date, and person to whom the report was made. It is imperative to use clear, concise, and objective reporting techniques.

Failure to report suspected child abuse/neglect is a misdemeanor under Minnesota Statute 626.556, Subdivision 6. Minnesota Statute 626.556, Subdivision 4 also provides that, "Any person ...participating in good faith and exercising due care in the making of a report...shall have immunity from any liability, civil or criminal, that otherwise might result by reason of his action." Individual reporting suspected child abuse/neglect shall be disclosed only by the local welfare agency upon court order if the report is substantiated.

Head Start may inform the parent/guardian that a report has been made. This may be discussed with the Director and/or staff member responsible for the NWCA Head Start Child Abuse and Neglect Policy.

A Head Start staff member who is suspected of child abuse/neglect must be reported. Appropriate actions will be initiated by the Director utilizing the Agency's Personnel Policies and Procedures and M.S.A. 626.556.

NORTHWEST COMMUNITY ACTION, INC.
PERSONNEL POLICIES AND PROCEDURES
REVISED AND UPDATED November 1, 2017

NWCA shall not retaliate against an employee for reporting abuse or neglect in good faith. Any person who knowingly or recklessly makes a false report shall be liable in a civil suit for any actual damages suffered by the person or persons so reported and for any punitive damages set by the court or jury.

Anyone with questions concerning the implementation and legality of abuse/neglect reporting should contact the Head Start Director as soon as possible as to the necessity and/or legality of having to make a report.

NWCA will concentrate efforts to prevent child abuse/neglect. This in part, is accomplished by:

1. Regular staff training concerning their responsibilities for reporting and other aspects of child abuse and neglect.
2. Families will have training made available on child abuse and neglect. Parents will be informed of NWCA Head Start Child Abuse and Neglect Policy at the beginning of the program year.
3. Teachers and Coordinators will provide information regarding child abuse and neglect to children enrolled in Head Start.
4. NWCA Head Start will work with local agencies to educate and coordinate efforts toward the prevention of child abuse and neglect. NWCA recognizes that it, in itself, is not an investigator or a treatment provider for child abuse and neglect victims, but is available for those children who may be at risk due to special conditions.

The NWCA Head Start Child Abuse and Neglect Policy will be implemented and revised yearly with the approval of the Head Start Policy Council and the Health Advisory Committee. It will also be revised using consultation with local social service departments, police departments, and other professional working with NWCA Head Start.

**MALTREATMENT OF VULNERABLE ADULTS REPORTING
POLICY FOR DHS LICENSED PROGRAMS**

NORTHWEST COMMUNITY ACTION, INC.
PERSONNEL POLICIES AND PROCEDURES
REVISED AND UPDATED November 1, 2017

These policies apply to all of Northwest Live Well at Home's employees, subcontractors, and volunteers. As a mandated reporter, if you know or suspect that a vulnerable adult has been maltreated, you must report it immediately (within 24 hours).

Where to Report

- You can report to the state-wide common entry point, the Minnesota Adult Abuse Reporting Center, at 844-880-1574.

- Or, you can report internally to the Respite Coordinator. If the individual listed above is involved in the alleged or suspected maltreatment, you must report to the Respite Program Manager.

Internal Report

When an internal report is received, the Executive Director is responsible for deciding if the report must be forwarded to the state-wide common entry point. If that person is involved in the suspected maltreatment, the Director of Housing and Planning will assume responsibility for deciding if the report must be forwarded to the state-wide common entry point. The report must be forwarded within 24 hours.

If you have reported internally, you will receive, within two working days, a written notice that tells you whether or not your report has been forwarded to the state-wide common entry point. The notice will be given to you in a manner that protects your identity. It will inform you that, if you are not satisfied with the facility's decision on whether or not to report externally, you may still make the external report to the state-wide common entry point yourself. It will also inform you that you are protected against any retaliation if you decide to make a good faith report to the state-wide common entry point.

Internal Review

When the facility has reason to know that an internal or external report of alleged or suspected maltreatment has been made, the facility must complete an internal review within 30 calendar days and take corrective action, if necessary, to protect the health and safety of vulnerable adults. The internal review must include an evaluation of whether:

- (i) related policies and procedures were followed;

- (ii) the policies and procedures were adequate;

- (iii) there is a need for additional staff training;

- (iv) the reported event is similar to past events with the vulnerable adults or the services involved; and

- (v) there is a need for corrective action by the license holder to protect the health and safety of vulnerable adults.

MN Department of Human Services Division of Licensing October 21, 2015

**NORTHWEST COMMUNITY ACTION, INC.
PERSONNEL POLICIES AND PROCEDURES**

REVISED AND UPDATED November 1, 2017

Primary and Secondary Person or Position to Ensure Internal Reviews are Completed

The internal review will be completed by the Executive Director. If this individual is involved in the alleged or suspected maltreatment, the Director of Housing and Planning will be responsible for completing the internal review.

Documentation of the Internal Review

The facility must document completion of the internal review and make internal reviews accessible to the commissioner immediately upon the commissioner's request.

Corrective Action Plan

Based on the results of the internal review, the license holder must develop, document, and implement a corrective action plan designed to correct current lapses and prevent future lapses in performance by individuals or the license holder, if any.

Staff Training

The license holder shall ensure that each new mandated reporter receives an orientation within 72 hours of first providing direct contact services to a vulnerable adult and annually thereafter. The orientation and annual review shall inform the mandated reporters of the reporting requirements and definitions specified under Minnesota Statutes, sections 626.557 and 626.5572, the requirements of Minnesota Statutes, section 245A.65, the license holder's program abuse prevention plan, and all internal policies and procedures related to the prevention and reporting of maltreatment of individuals receiving services. The license holder must document the provision of this training, monitor implementation by staff, and ensure that the policy is readily accessible to staff, as specified under Minnesota Statutes, section 245A.04, subdivision 14.

THIS REPORTING POLICY MUST BE POSTED IN A PROMINENT LOCATION, AND BE MADE AVAILABLE UPON REQUEST.

NORTHWEST COMMUNITY ACTION, INC.
PERSONNEL POLICIES AND PROCEDURES
REVISED AND UPDATED Effective November 1, 2017

Signature Page

I, _____
(Employee's Printed Name)

have received the Northwest Community Action, Inc. Personnel Policies and Procedures, Revised and Updated Effective as of November 1, 2017.

(Signature)

(Date)

Please sign this statement certifying that you have received the policies and return it to the office in Badger within five (5) days.

NORTHWEST COMMUNITY ACTION, INC.

PERSONNEL POLICIES AND PROCEDURES

REVISED AND UPDATED Effective November 1, 2017

Declaration Form for Prospective Employees in Head Start Programs

For use by Head Start Agencies to comply with 45 CFR 1301, Subpart D, Head Start Grants Administration, Personnel Policies, Section 1301.31 8 and (d).

Name of Prospective Employee:

Federal policies now require that Head Start Agencies require all prospective employees to sign a declaration prior to employment which lists:

1. All pending and prior criminal arrests and charges related to child sexual abuse and their disposition;
2. Convictions related to other forms of child abuse and/or neglect; and
3. All convictions of violent felonies.

The declaration may exclude:

1. Traffic fines of \$200 or less.
2. Any offense, other than any offense related to child abuse and/or child sexual abuse or violent felonies committed before the prospective employee's 18th birthday, which was finally adjudicated in a juvenile court or under a youth offender law;
3. Any conviction for which the record has been expunged under Federal or State law; and
4. Any conviction set aside under the Federal Youth Corrections Act or similar State authority.

Note that individuals who declare, through this form, that they have been arrested, charged with, or convicted of any of the offenses listed above are not automatically disqualified from being hired. Head Start Agencies must review each case to assess the relevance of an arrest, charge, or conviction to a hiring decision.

PLEASE PROVIDE YOUR SIGNATURE ON THE APPROPRIATE CATEGORY BELOW:

I have not been arrested, charged and/or convicted on one or more of the three types of offenses listed above.

Signature

Date

OR

I have been arrested, charged and/or convicted on one or more of the three types of offenses listed above.

Signature

Date

IMPORTANT: Each Head Start Agency must take necessary steps to assure the confidentiality of this form.

**NORTHWEST COMMUNITY ACTION, INC.
PERSONNEL POLICIES AND PROCEDURES**

REVISED AND UPDATED Effective November 1, 2017

NORTHWEST COMMUNITY ACTION, INC.

STATEMENT OF CONFIDENTIALITY

The success of Northwest Community Action, Inc. depends to a substantial extent upon the degree of confidentiality. For some, coming to an agency such as Northwest Community Action, Inc. can be a very frightening experience, especially when clients may be concerned that friends or neighbors may find out they are seeking assistance. It is essential that every one affiliated with Northwest Community Action, Inc. (employees and contractors) have a commitment to confidentiality. This involves respecting the clients right to privacy and creating a level of trust so clients may receive effective services through open discussions and dialogue. The policy on confidentiality, as set forth below, will be adhered to:

1. **DO NOT** disclose to anyone, the name or identity of clients unless it is necessary for the purposes of providing services. Take particular caution of disclosure to family, friends, or other agencies.
2. **DO NOT** discuss a client's situation with non-staff persons. This includes telephone calls or messages from clients; be especially careful about discussing a client or their situation openly in front of others.
3. **DO NOT** leave telephone messages or notes regarding client phone calls lying around in an open area. All messages should be processed and held in strict confidence.
4. **DO NOT** release client information to outside inquirers without appropriate verification of callers.
5. **DO** be aware of your surroundings when discussing a client or using client's name. Keep all client records and/or documentation secured to the extent possible.
6. **DO** handle inquiries from outsiders regarding clients or co-workers in the appropriate manner, i.e., refer inquiries to the Executive Director or supervisory level staff. This includes verification of employment of past and current co-workers/employees, as well as verification of services to clients.

I understand and hereby agree to hold all information obtained in the course of employment with Northwest Community Action, Inc. in the strictest confidence. My signature implies that I respect the privacy of clients, the Agency, & its employees, and will not inappropriately discuss or disclose any information regarding client cases to which I have been assigned, and/or have access to. I will also abide by the confidentiality requirements set forth herein. I agree to deliver promptly to Northwest Community Action, Inc. at the termination of my employment, or any other time at Northwest Community Action's request, without retaining any copies, all documents and other material in my possession relating, directly, and indirectly, to any confidential information.

Employee Signature

Date