



Employee Handbook



Welcome to Easterseals Midwest.

On behalf of the entire organization, we welcome you to Easterseals Midwest. Easterseals has been at the forefront of helping individuals with disabilities and their families live better lives for more than 100 years. From early intervention and in-depth autism training to job training and community living, Easterseals helps people with disabilities and their families address life's challenges and achieve personal goals.

You have joined a great group of professionals dedicated to helping people with disabilities by enriching education, enhancing health, expanding employment, and elevating community. We are proud to be the largest organization serving children, teens, and adults with disabilities in the Midwest.

As an employee, you are part of a team working together to ensure Easterseals is empowered to achieve our goals. Our employees are our most important asset. Each position, although different, contributes an essential part to the organization as a whole. You will change the lives of people with disabilities and their families, and along the way, you may find it also changes your life.

Whatever your position at Easterseals, it will be challenging but also exciting and rewarding. We are constantly growing and changing to better meet the needs of the community and the people we support. Remember to have fun, ask for help when needed, and never underestimate the importance of your work. You are a lifeline for people with disabilities. We wish you the best of luck with your new career and welcome you to our team.



Wendy Sullivan
Chief Executive Officer

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Introduction

About Easterseals Midwest

For more than 100 years, Easterseals has been dedicated to helping individuals with disabilities participate fully in the community and lead their best possible lives. Today, Easterseals Midwest is the largest provider of program services for individuals with disabilities in Illinois, Kansas, and Missouri, serving nearly 6,500 children and adults. From early intervention and in-depth autism therapies to job training and community living support, Easterseals is here to help people with disabilities, and their families, achieve all that life has to offer.

Code of Ethics

Easterseals Midwest has established a Code of Ethics to guide its board members, volunteers, and employees in their conduct when acting on behalf of the organization. It is a commitment to do what is right, obey all laws, behave with integrity and honesty, treat people fairly, respect diversity, accept accountability, communicate openly, and always behave in a way that is above reproach. The code contains broad principles reflecting the types of behavior expected towards individuals supported, families, guardians, donors, funders, employees, and the community. Easterseals requires all representatives of the organization to maintain these high ethical standards at all times.

Easterseals Midwest board members, volunteers, and employees are expected to:

- Put the people we serve first, treat them as unique individuals, and tailor our approach and services to help them pursue their goals, dreams, and aspirations.
- Demonstrate respect for and the inclusion of all people.
- Create a welcoming environment where all people feel included.
- Ensure fair and equitable treatment for all.
- Be good stewards of the financial and other support we receive.
- Foster integrity in all that we say and do.
- Strive for excellence in all our work.
- Embrace and celebrate change.
- Work together to support others.
- Take reasonable care in our work to minimize the risk of injury to any person and to prevent property damage.
- Maintain confidential information.
- Protect the health, safety, and general welfare of all individuals supported and employees.
- Report all information accurately and honestly.
- Disclose unethical, dishonest, fraudulent, and illegal behavior or the violation of company policies and procedures.
- Divulge conflicts of interest by any person associated with Easterseals.
- Not accept gifts, money, and gratuities from the individuals we support or their families.
- Respect and safeguard the personal property of individuals, supported visitors, personnel, and the property owned by the organization.
- Conduct business and financial practices with the utmost integrity and in accordance with applicable federal, state, and local laws.

This is not intended as a stand-alone policy and it does not represent the entirety of Easterseals Midwest ethical standards, nor does it answer every ethical question or issue that might arise. Rather, it is one element of a broader effort to create and maintain a quality organization that gives ethical conduct the highest priority. While no document can anticipate all of the challenges that may arise, this code of ethics communicates key guidelines and will assist employees, volunteers, and board members in making good decisions that are ethical and in accordance with applicable legal requirements.

Any violation of this code should be reported immediately to a supervisor or Human Resources.

Applicability of This Employee Handbook

This handbook has been prepared to introduce employees to Easterseals Midwest. It represents the policies relating to all employees' responsibilities, privileges, and benefits. It is presented as a matter of information only; the contents should not be interpreted as a contract between Easterseals and its employees. The employment relationship at Easterseals is an "at-will" relationship. It may be ended by either party at any time, with or without notice or cause, and for any reason not prohibited by law.

Easterseals has a mandatory Arbitration Agreement, which all employees are asked to sign, and is separate from this handbook.

We expect every employee to read this handbook carefully as it is a valuable reference for understanding your responsibilities at Easterseals. An employee's first responsibility is to be familiar with its content. This handbook is only a summary of policies; however, employees should review it with their supervisor or a member of Human Resources if any questions arise.

Due to the nature of our business, some departments have special needs and requirements for scheduling their workforce. Therefore, it is important for employees also to be familiar with the policies and procedures within the department in which they work.

Nothing in this handbook or any other Easterseals document or policy is intended to prohibit employees from reporting concerns to, filing a charge or complaint with, making lawful disclosures to, providing documents or other information to, or participating in an investigation or hearing conducted by the Equal Employment Opportunity Commission (EEOC), National Labor Relations Board (NLRB), Securities and Exchange Commission (SEC) or any other federal, state or local agency charged with the enforcement of any laws. Further, nothing about the policies and procedures set forth in this handbook should be construed to interfere with any employee rights provided under state or federal law, including Section 7 of the National Labor Relations Act.

Employment At-Will

Employment with Easterseals Midwest is an "at-will" relationship and, as such, may be ended by either party at any time, with or without notice. Nothing in this handbook is meant or should be interpreted to alter the at-will relationship. These guidelines are not a contract, express or implied, guaranteeing employment for any specific duration. Only the Chief Executive Officer of Easterseals has the authority to enter into an agreement that alters the at-will employment relationship, and any such agreement must be in writing and signed by the Chief Executive Officer of Easterseals.

Changes in Policy

Because our business constantly changes, Easterseals Midwest may change any of its policies and benefits at any time. This handbook supersedes any and all policies issued before its release. Changes will be effective on dates determined by Easterseals, and employees may not rely on policies that have been superseded. This handbook will be revised periodically but will not be updated every time a change is made.

Employees who are uncertain about any policy or procedure should check with their supervisor or the Human Resources Department for clarification.

Employment Policies

Equal Opportunity (EEO Statement)

Easterseals Midwest is an Equal Opportunity Employer and affords all employees or applicants equal opportunity without regard to race, color, religion, sex (including pregnancy, childbirth, and related disabilities), age, national origin, ancestry, sexual orientation, physical or mental disability, HIV/AIDS status, genetic information, civil air patrol membership, or military/veteran status in all employment actions. This includes but is not limited to recruitment, hiring, placement, training, transfer, promotion, layoff, termination, shift assignment, seniority determination, pay rate, benefit plans, and other forms of compensation.

Easterseals maintains a policy of non-discrimination with employees and applicants for employment. No aspect of employment with Easterseals will be influenced in any manner by race, color, religion, sex (including pregnancy, childbirth, and related disabilities), age, national origin, ancestry, sexual orientation, physical or mental disability, HIV/AIDS status, genetic information, civil air patrol membership, or military/veteran status, or any other basis prohibited by statute. Employment decisions are made based on the individual's qualifications for the position being filled. Decisions on promotions are likewise made based on the individual's qualifications as they relate to the requirements of the position for which they are being considered.

Disability Accommodation - Americans with Disabilities (ADA)

Easterseals Midwest has a formal procedure to review reasonable accommodation requests for our employees or applicants requiring support. Reasonable accommodation will be provided to otherwise qualified individuals with a known physical or mental disability if such accommodation would not impose an undue hardship on Easterseals and would enable the individual to apply for or perform the essential functions of the position in question.

Any applicant or employee who requires accommodation to perform the job's essential functions must notify Human Resources to initiate the accommodation process.

Easterseals will evaluate the need for accommodation and then identify possible accommodations, if any, that will help to eliminate the limitation or barrier. This is an interactive process; the individual requesting accommodation must fully cooperate with Easterseals in seeking and evaluating alternatives and accommodations. Easterseals may require medical verification of the disability and the need for accommodation.

Recruitment and Selection

Easterseals Midwest is committed to a policy of equal employment opportunity for all applicants and employees. Easterseals will employ, retain, promote, terminate, and treat all employees and job applicants based on merit, qualification, and competence.

Human Resources will recruit qualified applicants for Easterseals. Recruitment includes advertising, testing, and initial interviews. Applicants with qualifications and salary objectives that appear to meet the specifications for an open position are referred to the appropriate department for further screening and evaluation. Human Resources is responsible for determining if the applicant is qualified, checking backgrounds, and making the final offer to the candidate. Applying for a position does not guarantee an interview, and an interview is not a guarantee of being granted the position.

Prior employment history with the agency will be considered in all transfer/reemployment decisions. An employee involuntarily terminated due to misconduct or unsatisfactory job performance is generally not eligible for rehire.

All job offers will be conditional based on the results of a criminal record check, Missouri Family Care Safety Registry (FCSR) check, and Department of Motor Vehicle (DMV) check when required. New employees may only work directly with those we support once all background checks have been completed.

Job Posting

Notice of job openings is posted online at www.joineasterseals.com. Current employees interested in transfer opportunities are responsible for monitoring job vacancy notices and submitting a transfer application for consideration of a transfer.

Application Materials

Individuals applying for a position at Easterseals Midwest must provide application materials that are complete, accurate, and up-to-date. Outside applicants must complete an application describing their educational qualifications, professional experience, and references. Any individual who has provided inaccurate or incomplete information will be subject to disciplinary action up to and including termination upon discovering the inaccurate or incomplete information.

Pre-Employment and Periodic Physical Examinations

Easterseals Midwest strives to provide a safe and healthy work environment. Such an environment is only possible when each employee can perform their job duties safely and effectively and remain able to do so throughout their employment. Employees not fit for duty may present a safety risk to themselves and others. Certain positions at Easterseals may require an applicant to undergo pre-employment and/or periodic physical examinations after hire to evaluate the ability to perform the position's duties safely.

If an employee has been involved in a pattern of accidents or incidents while on the job resulting in potential injury to themselves or others or if there is reasonable suspicion that the employee may not be capable of performing the required job without danger to themselves or others, they may be required to be screened to determine their ability to perform the essential functions of the job safely.

If an employee cannot meet the physical requirements of the position, they may be given an opportunity to apply for an open position that does not have the same physical requirements. If another position cannot be located without the physical requirements, it will result in employment separation.

Employment Authorization Verification

United States. Employees are required to complete the federal Form I-9 on the first day of employment. If this form and employment eligibility verification is not completed during the first three days, we must legally terminate employment. If current employees do not comply with this requirement or their authorization status has changed, Human Resources must be notified immediately.

New Hire Paperwork

All employees must complete on-boarding paperwork before beginning work and delivering services. This includes but is not limited to I-9 forms and supporting documentation, W-4 tax forms, the Arbitration Agreement, and Employment Application. When required, newly hired employees must provide proof of education, a valid driver's license, proof of automobile insurance, and proof of applicable licensure and/or certification. This information will be maintained in each employee's Personnel File.

Arbitration Agreement

All Easterseals Midwest employees are required to agree and consent in writing that they, along with Easterseals, will submit any disputes, claims, or controversies that may arise out of application for employment, employment, and or/termination of employment with Easterseals to binding arbitration. This agreement is a condition of employment with Easterseals and must be signed before working.

Certification, Licensing, and Registration

Certain positions designated by Easterseals Midwest require employees to achieve and maintain professional certification, licensure, and/or registration. It is the responsibility of the employee to meet such standards and to notify management that requirements are met, and records are up-to-date.

Individuals allowing certifications, licensure, and/or registration to lapse may be removed from their positions, either temporarily or permanently, depending on the circumstances.

Driver's License and Proof of Auto Insurance

An employee whose job responsibility includes transporting an individual supported by Easterseals Midwest in a company vehicle or the employee's personal vehicle must have an appropriate valid driver's license and proof of statutory minimum automobile insurance on file with Human Resources.

Acceptable proof of insurance is a valid insurance card or the insurance policy's declaration page. The employee's name must be listed on the policy. Employees are responsible for providing Human Resources with an updated driver's license and insurance information when either expires. Failure to provide and keep this information current will result in being removed from the schedule and may lead to disciplinary action up to and including termination.

No Shift or Location Guarantee

Employees are hired as employees of Easterseals Midwest and not for a particular department, program, location, shift, or individual supported. Easterseals provides services to some individuals twenty-four hours a day, seven days a week. Therefore, due to the needs of the organization or the individual served, including the individual or family requests, the placement of employees may be changed without advance notice. As a result, an employee's schedule (days, times, number of hours worked per week, etc.) could also change without advance notice. Easterseals will make every effort to provide an employee with as much advance notice as possible.

Orientation Period for New or Transferred Employee

The first six months in a new position with Easterseals Midwest is a period of orientation. The orientation period is intended to allow new, promoted, or transferred employees to become familiar with the position and work environment and to demonstrate their capabilities. During this time, the employee's knowledge, skills, and abilities are reviewed on a continuing basis. The orientation period may be formal or informally structured based on the department's needs and is a continuation of the selection process. During the orientation period, on-the-job abilities are assessed, and a decision is made by management concerning continued employment. Completion of the orientation period does not guarantee continued employment and does not change the at-will nature of the employment relationship.

Personnel Files

Every employee will have a personnel file that is maintained by the Human Resources Department. Important events in each employee's history with Easterseals Midwest will be recorded and kept in the employee's personnel file. Regular performance reviews, change-of-status records, training records, commendations, corrective action warnings, and educational attainment records are examples of records maintained.

Personnel files are confidential and the property of Easterseals. Access to complete personnel records is restricted to Human Resources and management. A limited selection of personnel documents will be made available to staff electronically in our HR system. It should be noted that personnel records may be utilized and disclosed for use in an administrative proceeding, audit, litigated matter, or arbitration.

Current employees can make an appointment with a Human Resources team member or their direct supervisor to review their personnel file. Employees wishing to have copies of their personnel files must make this request in writing to Human Resources. Items requested will be reviewed to determine if they will be released, and if released, copies will be emailed to the employee's company email address within 72 hours of the approved request.

Information in an employee's personnel file must be kept up-to-date, and it is the employee's responsibility to keep their personal information current. Any updates or changes to personal information can be made through our online HR system. Employees should also report any additional training or education received so it can be documented in their personnel records.

Performance Reviews

Easterseals Midwest will provide employees at all levels with frequent, objective feedback on their job performance. As part of our performance review process, we typically complete performance check-ins every three months. Check-ins allow staff and their supervisors to set goals, track progress, and discuss performance. In most cases, a performance review will be conducted once a year. The performance review allows the supervisor to discuss the employee's overall performance, summarize both formal and informal performance discussions held throughout the review period, and allow the employee to provide input and set goals for the coming year. It will review strengths and also point out ways to improve job performance. If you have not received a performance review in the last 12-month period, please notify your supervisor or the Human Resources Department.

Training and Professional Development

Easterseals Midwest considers our employees to be our most valuable asset. As such, the organization has committed significant resources to provide training and the professional development necessary for employees to perform their job effectively, provide the highest quality service, and build professional skills to grow within the field.

Each position at Easterseals has required training criteria that must be achieved initially upon hire and maintained annually. Certain positions require employees to achieve and maintain professional credentials. All employees are responsible for knowing the requirements of their position and ensuring that their training certifications and credentials are maintained without lapse. Failure to maintain training compliance will result in being removed from the schedule and may lead to disciplinary action up to and including termination.

Transfer Policy and Procedure

Easterseals Midwest recognizes that employee motivation, productivity, and retention are dependent upon people working in jobs that are well suited to their interests and therefore offers and encourages transfer opportunities for current employees.

An employee interested in a transfer opportunity must be in good standing in their current position and have been in that position for a minimum of six months before seeking an internal transfer unless:

- The transfer is due to work restructuring.
- The transfer is at the request of the individual supported or guardian.
- The transfer is needed due to an accommodation request.
- The Department Director approves an exception.

Employees who wish to be considered for promotions or lateral transfers must complete a transfer form, the online application and notify their current supervisor or manager that they have applied for a transfer.

The employee's work record, including performance, attendance, efforts to develop skills, and related behavior, will be used in determining suitability for a position. Consideration will be given to the employee's demonstrated interpersonal skills (such as courtesy, congeniality, helpfulness, positive attitude, and ability to maintain confidentiality), among other job-related factors, before making a final decision. Deficiencies in such skills or job-related factors may eliminate an individual from further consideration.

Transfer applications and other candidates from within and outside the organization will be considered.

Easterseals has the right to hire the most suitable applicant for the position regardless of the applicant's length of service. If selected for an internal transfer, proper notice of 30 days must be given before a transfer can occur.

Transfer applications and other candidates from within and outside the organization will be considered.

Easterseals has the right to hire the most suitable applicant for the position regardless of the applicant's length of service. If selected for an internal transfer, proper notice of 30 days must be given before a transfer can occur.

Employment of Minors

The labor laws of Missouri require all minors between 14 and 16 years of age to obtain a work permit. A copy of the work permit must be sent to Human Resources before the individual will be entered into payroll. A child under 16 shall not be employed or permitted to work more than eight hours in any non-school day, nor more than 40 hours in any non-school week, nor before the hour of 7 am nor after 9 pm. During a school term, a child under 16 shall not be employed or permitted to work after 7 pm on days immediately preceding days when school is in session, nor more than three hours a day on school days, nor more than 18 hours a week in school weeks.

Employment of Relatives

Easterseals Midwest has no general prohibition against hiring relatives or spouses. However, a few restrictions have been established to help prevent problems of safety, security, supervision, and morale.

While Easterseals will accept and consider applications for employment from relatives, spouses, or persons with whom another employee has an intimate relationship, we will not hire them into positions where they directly or indirectly supervise or are supervised by another family member, spouse or person with whom another employee has an intimate relationship. Such relatives generally will not be placed in positions where they work with or have access to sensitive information regarding a family member or if there is a conflict of interest.

Employees must disclose to Human Resources if they are directly or indirectly supervising or being supervised by another family member, spouse, or person with whom they have an intimate relationship. Human Resources will work to resolve the matter, which may include transferring an existing employee to another position, or if no alternative can be agreed upon, it may result in separation of employment.

In addition, family members may not work under the same supervisor or at the same work site unless written permission is given from the department's Vice President.

All employees are expected to conduct themselves in an appropriate business manner regardless of any close personal relationship which may exist or develop during their employment. Behavior, which is in any way disruptive or hostile, will not be tolerated and may result in disciplinary action up to and including termination.

Employment Reference and Verification

Easterseals Midwest works with an outside vendor to complete employment references and verifications.

Information regarding this process can be found in the employee self-service section in the HR system. Any employee needing income verification should follow this process or seek assistance from Human Resources.

Employee Benefits

Easterseals Midwest strives to provide a competitive package of employee benefit programs for its eligible employees.

Complete and official insurance details and payroll plans are contained in materials that employees receive in new employee orientation and are located in the employee self-service section of the HR system. The descriptions in this handbook are only summaries of general information. Contact a member of the Benefits team in Human Resources for more details.

The existence of these employee benefits and plans, in and of themselves, does not signify that an employee will be employed for the requisite time necessary to qualify for these benefits and plans.

Annual Enrollment

Employees have an opportunity during annual open enrollment each November to make changes in their health, dental, vision, life insurance, and Health and Dependent Care Spending Plans. The changes made during annual enrollment are effective January 1 of the following calendar year. Easterseals Midwest plan year for these benefits runs January through December.

Health, Dental, and Vision Insurance

A group medical, dental, and vision plan is offered to all full-time employees. An employee must elect coverage within the first 60 days of employment or full-time status, and coverage begins on the first day of the month following the 60th day of full-time status, subject to the terms of the policy. Employees are responsible for a portion of the monthly premium for the plans.

Failure to complete the appropriate enrollment within 60 days of hire or full-time status effective date will result in non-coverage. Benefits, if elected, will begin on the first of the month following the 60th day of full-time status.

An employee who has a change in their employment status from full-time to part-time is no longer eligible for benefits beginning on the effective date of the change. If a full-time employee does not maintain their full-time hours for an extended period of time, then they may be reduced to part-time and no longer be eligible for benefits. The employee may elect to continue existing plans through COBRA (at the employee's expense) as long as they have paid off any benefit arrears or under the Affordable Care Act (ACA) if applicable.

Easterseals Midwest complies with all rules and regulations of the Affordable Care Act (ACA). Employee hours worked are monitored, and those who become eligible under the ACA guidelines are offered medical coverage.

Flexhealth (125 Plan)

Flexhealth is a program designed to increase spendable income by lowering the amount of gross salary on which taxes are paid. By participating in the Flexhealth program, employees pay for health, dental, and vision coverage with before-tax dollars, increasing spendable income. Premiums for these plans will be deducted from the total gross salary, and federal, state, city, and FICA taxes will be calculated and deducted from this lower balance. This is possible under a provision of the present IRS code, section 125. However, this prevents any changes in health coverage outside of the annual enrollment period, except in the case of a qualifying event (death, the birth of a child, marriage, etc.) Flexhealth is automatic upon enrollment in all Easterseals Midwest-sponsored health, dental or vision plans.

Flexible Spending Plans

Easterseals Midwest offers spending plans which allow employees to pay for health and childcare expenses on a before-tax basis. In other words, no federal, state, city, or social security taxes are paid on amounts set aside within the spending account.

To participate in health or childcare spending plans, an employee must enroll within the first 60 days of full-time status or during annual enrollment. Employees will not be allowed to enroll in the spending plans outside of these two periods unless there is a qualifying event. The election made is irrevocable. Employees will not be allowed to change or terminate contributions during the year unless there is a family status change. If a family status change occurs during the year, the employee will have 30 days from the date of the event to initiate a change in the spending account.

Employees must re-enroll in the spending plan annually to maintain the pre-tax spending account for child care or health care. The IRS requires an advance estimate of how much salary an employee wishes to contribute for the coming year.

Employees may enroll in either the health care or child care plan or both plans simultaneously, and an online election must be completed to open an account.

Any funds deposited during the year may be used only for expenses incurred during that year. Any money left in the account on December 31 may be reimbursed by submitting receipts for expenses by March 31 of the following year. Any money left in the account at year-end, which is not claimed by March 31 of the following year, will be forfeited. Federal tax law requires the forfeiture provision in order to maintain the pre-tax deductions for the spending plan.

Health Spending Plan

Qualified health expenses that are incurred during employment with Easterseals Midwest may be reimbursed under this plan. An employee will not be reimbursed for charges incurred before employment with Easterseals or after employment ends. An employee is eligible to continue in the health spending account after employment ends; however, contributions will be made on an after-tax basis.

Any amounts reimbursed by the health spending plan cannot be claimed as an itemized medical deduction on income tax returns.

Some common expenses that may be submitted for reimbursement under the health spending plan are deductibles and copayments, eyeglasses, contacts, hearing aids, non-covered prescriptions, and dental charges above the annual maximum. Reimbursement is not available for premium payments, cosmetic surgery, or expenses covered by any medical or dental plan.

Dependent Care Spending Plan

Qualified child and adult care expenses are those rendered by a licensed daycare center or a babysitter over the age of 19. The services must be rendered for the sole purpose of allowing both spouses to work or seek an education. The child receiving the care must be under the age of 13. Adult care requires proof that the employee is responsible for the care of the adult. Contributions may not exceed \$5,000 per year on a pre-tax basis.

Employees will not be reimbursed for expenses incurred before enrollment. However, employees may be reimbursed for post-termination expenses incurred during the calendar year of the termination.

Employees are not allowed to claim the dependent care credit on tax returns for any amounts contributed to this plan. Any amount contributed to the spending account will offset dollar-for-dollar, the maximum amount available for the credit. Employees also are required to file form 2441 with their income tax returns if they participate in the dependent care spending plan. It is required to report the name, address, and taxpayer identification number (or Social Security number for an individual) of the dependent care provider. Total dependent care expenses for the year will appear on the W-2 form.

Short Term Disability (STD)

Easterseals Midwest offers a voluntary Short Term Disability (STD) plan that full-time employees can purchase. An STD plan can replace part of an employee's income due to their own personal temporary illness, injury, or disability. Payments begin on the first day of an accident and/or hospitalization or on the eighth day of an illness. This plan is a post-tax offering, meaning that premiums for the plan are deducted from an employee's earnings after taxes.

The STD benefit payment is 60% of the employee's annual base salary at the time of enrollment for the plan year up to a maximum of \$1,500 per week. EIB/PTO is combined with the STD benefit at a rate of 40% of a "regular" work week, not to exceed 16 hours. The benefit may be paid for a maximum of 13 weeks per calendar year.

The benefit period is from January to December. Enrollment occurs during the annual benefits open enrollment period. New hires must enroll within 60 days of hire, and current employees with a status change to full-time must enroll within 60 days of the status change. Employees are not allowed to enroll in the STD plan outside of these time frames. Elections made are irrevocable. Employees will not be allowed to change or terminate contributions during the year.

It is the responsibility of the employee to initiate an STD claim request by contacting the plan provider. Once a claim has been filed, the plan provider determines if the claim is valid and over what time period payments will be made.

Part of determining claim eligibility is a three-month look-back and a 12-month look-forward period. If an employee receives treatment for a condition within the three months prior to their STD coverage becoming effective, then any claim relating to that same condition will be considered uncovered for the 12 months following their coverage start date. Should staff maintain their coverage with the STD plan beyond the 12 months following their start date, they may then receive coverage for that previously diagnosed condition.

The STD plan is a voluntary benefit that is not administered or managed by Easterseals. It is an employee's responsibility to research this offering to determine if it has value for their needs. Any questions should be directed to the STD vendor.

Life Insurance

Easterseals Midwest provides regular full-time employees' life insurance at the rate of one time their annual salary up to a maximum of \$100,000. This life insurance is effective on the first day of the month following the 60th day of employment. This coverage is provided at no cost to the employee.

Employees may enroll in voluntary life insurance for themselves, their spouses, and/or dependent children. The cost of these benefits is paid by the employee. Contact Human Resources for additional information.

Retirement Plan

Easterseals Midwest offers a qualified 403B tax-deferred retirement plan under the Internal Revenue Code, thereby deferring taxes on contributions to the retirement years when benefits are withdrawn. Once eligibility criteria have been met, Easterseals provides a partial matching contribution on eligible wages. This benefit is available to both full and part-time employees. Contact Human Resources for additional information.

Social Security

All employees are covered by the Federal Social Security Act. The required percentage is deducted from an employee's paycheck to pay the employee's portion of this protection, and Easterseals Midwest matches this deduction dollar for dollar. The plan is designed for future security and that of dependents and provides for retirement, disability, death, survivor, and Medicare benefits.

Hepatitis A Vaccination

Employees who, through the course of their employment with Easterseals Midwest, will be out in the community in food service establishments supporting individuals may be required to receive a Hepatitis A vaccination. This need will be established at the time of employment or upon assignment to a food service establishment, and the employee will be given the opportunity to receive the vaccination at no cost. Contact Human Resources for more information.

Hepatitis B Vaccination

Easterseals Midwest employees can receive the Hepatitis B vaccination series at no cost. All employees will receive training in Blood Borne Pathogens within their first ten (10) days of employment as required by OSHA standards. If interested in the vaccination series, contact Human Resources for more information.

Continuation of Coverage (COBRA)

The Consolidated Omnibus Budget Reconciliation Act (COBRA) is a provision of special interest that affects employer-sponsored health plans.

Easterseals Midwest offers a continuation of group health, dental, and vision insurance and spending care accounts to employees and their dependents who, upon the occurrence of a qualifying event, lose coverage. Coverage for employees may continue for up to 18 months in the case of termination or reduction of hours; dependent coverage may be extended up to 36 months. In the case of disability occurring during the first 18 months of continuation, coverage may be extended for an additional 11 months.

If elected, the full cost of the sponsored plan(s) is paid by the employee or past employee plus an additional 2% administration fee. Contact Human Resources for more information.

The Genetic Information Non-Discrimination Act (GINA)

Easterseals Midwest complies with the Genetic Information Non-discrimination Act (GINA), which prohibits employers and other entities from denying employment and/or health insurance coverage and/or requesting or requiring genetic information of an employee or applicant or family member of an employee or applicant except as specifically allowed by law.

Certificate of Creditable Coverage

Easterseals Midwest complies with the federal law that requires employers to provide certificates of coverage to employees enrolled in health insurance when they terminate. Employees reducing their hours to less than full-time, making them ineligible for benefits, will also receive this certificate from the insurance carrier.

Health Insurance Portability and Accountability Act (HIPAA)

Easterseals Midwest is committed to protecting the private data of its employees and the individuals it serves, including health information. Plan participants can be assured that Easterseals will comply with federal privacy laws and respect an employee's right to privacy. It is required that all members of our workforce and third parties that are provided access to health information comply with privacy practices.

Time Off Policies

Paid Time Off (PTO)

Paid Time Off (PTO) is a benefit provided to all full-time employees. It is paid time away from work and is to be used for vacation, holidays, personal days, and personal illness. The use of available PTO is always subject to supervisor approval and department guidelines. Requests for time off should be made as far in advance as possible. Time off will be scheduled so as to provide adequate coverage of jobs and staff requirements. Additionally, it is the employee's responsibility to provide adequate notice when not able to work regularly-scheduled shifts. Failure to adhere to time off procedures may result in disciplinary action up to and including termination.

Below are some guidelines to clarify approved PTO use:

- PTO can only be used to replace typical hours worked on regularly scheduled workdays (i.e., if an employee normally works Monday-Friday, then PTO should never be applied on Saturday or Sunday)
- The number of PTO hours used on a given day cannot exceed an employee's regular schedule (i.e., if an employee typically works 8 hours on a given day, they are not permitted to use more than 8 hours of PTO on that day)
- When working part of a typical scheduled day, working hours and PTO hours must not exceed the employee's normally scheduled hours (i.e., if the employee would have been scheduled for 12 hours of work and requests 6 hours of PTO, then the combined number of hours on the timecard for that day cannot exceed 12 hours. If the employee ends up working 8 hours, then only 4 hours of PTO can be applied for a daily total of 12 hours).
- PTO hours cannot be applied if total hours on the timecard exceed the weekly scheduled amount (i.e., if an employee is typically scheduled for 38 hours per week, then no PTO can be applied to their timecard if they worked 38 or more hours that week.)

Department Directors, with the approval of the Chief Human Resources Officer, may set forth additional policies concerning PTO. These policies will be communicated to employees by the Department Director and/or their designee.

Requests for time off, time of greater than two weeks, must be submitted in writing to your supervisor for consideration. Factors that will be reviewed when considering such a request include job requirements, business needs, and the employee's performance. The approval or denial of extended time off is at the discretion of the Department Director and Human Resources. The request must not exceed 30 days without written permission from the Chief Human Resources Officer. Extended time off may be paid or unpaid, depending upon the circumstance. Employees may be required to utilize any available PTO, and once PTO is exhausted, the time off will become unpaid. If an employee is on any of Easterseals Midwest benefit plans, the employee is responsible for payment of the employee portion of the premium for insurance coverage. Failure to pay such premiums will result in termination of coverage.

The charts below indicate the number of PTO hours accrued per week and the maximum number of PTO hours that may be accrued in the bank as of December 31. Employees must maintain full-time status to be eligible for PTO accrual. If full-time hours are not worked, or an employee is on a leave of absence, PTO will not accrue.

The accrual rate is based on full-time years of service. Employees may accrue more than the maximum number of hours determined by their length of service during the calendar year but cannot have more than their maximum number of hours based on years of service in their PTO bank on December 31.

**** Direct support employees in Community Living have a separate PTO chart. Please refer to the third chart for details on accruals and maximums if you are in a direct support position in Community Living ****

PTO Accruals and Maximums by Years of Service - Hired July 1, 2018, and After

Years of Service	Weekly Accrual	PTO 8 Hour Days Per Year	Max Carry Over
< 1 yr.	3.69	24	88
1	3.85	25	96
2	4	26	104
3	4.16	27	112
4	4.31	28	120
5	4.46	29	128
6	4.62	30	136
7	4.77	31	144
8	4.93	32	152
9	5.08	33	160
10	5.23	34	168
11	5.39	35	176
12	5.54	36	184
13	5.69	37	192
14	5.85	38	200
15	6	39	208

PTO Accruals and Maximums by Years of Service - Hired Before July 1, 2018

Years of Service	Weekly Accrual	PTO 8 Hour Days Per Year	Max Carry Over
< 1 yr.	4.31	28	120
1	4.46	29	128
2	4.62	30	136
3	4.77	31	144
4	4.93	32	152
5	5.08	33	160
6	5.23	34	168
7	5.38	35	176
8	5.54	36	184
9	5.69	37	192
10	5.85	38	200
11	6	39	208
12	6.16	40	216
13	6.31	41	224
14	6.46	42	232
15	6.62	43	240

PTO Accruals & Maximums by Years of Service for Community Living Direct Support Positions

Years of Service	Weekly Accrual	Annual PTO Accrual	Max Carry Over
< 1 yr.	2.31	120	80
1	2.46	128	88
2	2.62	136	96
3	2.77	144	104
4	2.92	152	112
5	3.08	160	120

The accrual period for earning PTO follows the calendar year, January through December. Employees are responsible for managing their PTO balances. Any hours over the maximum carryover amount at the end of the calendar year will be transferred to the Extended Illness Bank (EIB) or forfeited if the EIB bank has reached its maximum. If both banks reach their maximum, no further accrual will occur until PTO falls below the maximum.

PTO is paid at the base rate at the time the PTO is taken. If an employee has two or more rates of pay, the pay for PTO is based on the rate the employee would have received if they were regularly scheduled to work. PTO is not used toward overtime calculations.

New employees begin accruing PTO from the first full pay period but may only use it for designated holidays until their six-month orientation period is complete unless written permission is granted from a Director, Vice President, or Chief Officer.

Employees are not permitted to use more PTO than is available to them in their PTO bank. Employees (and their supervisors) are responsible for monitoring their balances and using only what is available in the employee's bank. PTO and EIB balances are available in the HR System.

Full-time employees who transition to a part-time position will have their PTO bank frozen until such time that their status changes back to full-time or they leave service, at which time their PTO bank would be paid out per policy (see Leaving Service section).

An employee may not use PTO or Extended Illness Bank (EIB) during a resignation period except for designated holidays. If an employee leaves services voluntarily or involuntarily within the first 12 months, they will not be eligible to receive the PTO payout.

For those not assigned to work in a 24-hour program, we have nine designated office closure days, and they are *New Year's Day, Dr. Martin Luther King Jr. Day, President's Day, Memorial Day, Independence Day/ Fourth of July, Labor Day, Thanksgiving Day, Friday following Thanksgiving Day, and Christmas Day.*

PTO is to be used for all designated office closure days. If an employee does not have PTO time available or they want to use their PTO for a different day off, they may elect to work the designated office closure day with supervisor approval. The employee's role will play a factor in the decision to grant this request, as work must be available for the employee to perform. If the employee has no PTO available and still wants to take the office closure day off, it can be time off without pay.

Extended Illness Bank (EIB)

The Extended Illness Bank (EIB) is a non-vested plan to provide employees with income protection in the event of the employees' extended absence due to childbirth, illness, accident, or hospitalization. **EIB is to be used only for an employee's illness or injury.** Medical documentation may be required to ensure proper management of time off.

The maximum EIB accrual is 520 hours (90 calendar days). EIB is not eligible for payout at the separation of employment. The first three days of paid time off for any illness or occupational injury (other than a Family Medical Leave of Absence) must be taken from PTO. If PTO is not available, any remaining time up to three days will be unpaid time. If an illness, hospital stay, or recovery time extends beyond three consecutive scheduled work days, an employee may use EIB. For an employee to receive payment from EIB, medical substantiation of illness or injury may be required. A second opinion, at the organization's expense, may also be required. A physician's release may be required for an employee to return to work from EIB time off. If the EIB account is exhausted and additional recovery time is necessary, an employee

may be allowed to use available PTO or take unpaid time off.

Family and Medical Leave (FMLA)

The Family and Medical Leave Act allows eligible employees to take up to 12 workweeks of unpaid leave in a 12-month period for certain reasons. As mentioned below, leave that is taken under the Family and Medical Leave Act is subject to a certification process. Longer leave time is provided under the Family and Medical Leave Act for qualified military caregiver leave.

If an employee takes a new child, family, exigency, or caregiver leave, they will be required to use any available PTO. This means that, under certain conditions, an employee may receive pay for part or all of the time on a leave of absence. During medical leave, an employee will be required to use EIB at the beginning of the leave. If the leave continues after all accrued EIB has been used, an employee will be required to use accrued PTO. After accrued PTO is exhausted, any further leave is unpaid.

In order to be eligible for a new child, medical, family, exigency, or caregiver leave, an employee must have been employed by Easterseals Midwest for at least 12 months over the last seven-year period and worked at least 1,250 hours during the 12 months immediately preceding the leave.

Leave may be taken all at once, intermittently (such as for periodic medical treatment), or, if the circumstances of the job permit, by working part-time (such as just after a child's birth or while recovering from an illness). Arrangements should be discussed with Human Resources, and additional documentation indicating the medical necessity may be required.

If eligible, an employee may take as much as 12 workweeks of leave for the following reasons:

- The birth of a child (medical leave)
- The placement of a child in the home for adoption or foster care (new child leave), care of a child after birth, within 12 months of birth, or placement (new child leave).
- The need to care for a spouse or domestic partner, child, or parent with a serious health condition (family leave) or a serious personal illness prevents an employee from doing their job (medical leave).
- Because of any qualifying exigency arising out of the fact that the employee's spouse, child, or parent is a military member on covered active duty status (or has been notified of an impending call or order to covered active duty).

An employee's leave entitlement is 12 work weeks of leave during a 12-month period. Easterseals uses the rolling method to determine leave availability. Under the rolling method, for example, if a qualifying event occurs on December 1, the employee is entitled to 12 weeks of leave until December 1 of the next year, regardless of the number of qualifying events that occur. A request for a leave of absence generally will not be granted if an employee already has used 12 weeks of leave during the preceding 12 months.

Employees may also take up to 26 weeks of leave during a single 12-month period to care for a covered service member with a serious injury or illness (caregiver leave). Easterseals will determine the single 12-month period in which the 26 weeks of leave entitlement described in this paragraph occurs using the 12-month period measured forward from the date an employee's first FMLA leave to care for the covered service member begins.

If the need for leave is foreseeable, employees are expected to give 30 days advance notice. Employees should contact Human Resources to discuss their need for leave and the process that is to be followed. If

an employee fails to provide 30 days notice of foreseeable leave with no reasonable excuse for the delay, the leave may be delayed.

Employees undergoing planned medical treatment are expected to use reasonable effort to schedule the treatment to limit disruptions to Easterseals

If the need for leave is not foreseeable, sudden, or unexpected, employees should give notice of the need for leave as soon as possible and before the start of a scheduled workday. The notice should be provided to Human Resources. In the case of an emergency or extraordinary circumstances, when notice of the need for leave cannot be given before the work period, notice shall be provided within one business day of the need for leave arising.

It is the responsibility of the employee to report their request for leave to both their management team, according to the department's policy and procedure for requesting time off, and to Human Resources.

Easterseals requires medical certification for leaves requested for an employee or a covered family member's serious health condition. The Certification of Health Care Provider form is available from the Human Resources Department.

Additionally, Easterseals has the option to require a second certification from a physician of its choosing. If there is a conflict between the first and second certifications, Easterseals may request a third certification. Easterseals and the employee shall jointly select the physician for any third such certification, whose decision will be final. Easterseals will pay for both the second and third certifications. Subject to the limitations set forth under the FMLA, Easterseals may also require periodic recertification. All ongoing leave cases will require recertification at least every six months.

Certification for medical conditions must be provided to Human Resources no later than 15 days after the certification request is submitted to the employee. Failure to provide the certification may result in denial of leave or reinstatement from leave, in which case the employee's leave of absence would be unauthorized, subjecting the employee to disciplinary action up to and including termination. If the leave is for an employee's own serious health condition, the employee will be required to provide a medical release, with or without restrictions, in order to return to work.

It is the responsibility of the employee to ensure that any certification or other paperwork required for the approval of their leave and/or return to work is completed correctly and turned in to Human Resources by the indicated deadline. Failure to do so may result in denial of leave or reinstatement from leave, in which case the employee's leave of absence would be unauthorized, subjecting the employee to disciplinary action up to and including termination.

If both spouses are employed by Easterseals Midwest, and both meet the eligibility requirements, the aggregate number of weeks of leave will be limited to 12 weeks total if the leave is taken for the birth of a child, the adoption of a child, the placement of a child for foster care, or to care for a sick parent.

Eligible employees are entitled to reinstatement to their former position or an equivalent position upon their timely return from eligible leave. Although the job an employee returns to may not be identical, it will offer the same working conditions, benefits, etc. Such rights shall not apply if the employee is a highly compensated employee as set out in the FMLA (subject to the conditions set forth in the FMLA and its regulations or if the

employee would not otherwise have been employed at the time reinstatement is requested).

An employee will not lose any seniority or benefits because of the leave. PTO benefits do not accrue during the leave. Additionally, an employee's return to work may be delayed if they fail to provide a release to return to work.

Employees on unpaid FMLA leave will be required to pay any employee premiums for health care coverage. Failure to pay such premiums may result in a lapse or cessation of coverage.

Employees who fail to return from FMLA leave may be required to repay any health insurance premiums paid by Easterseals during the employee's FMLA leave.

By requesting and accepting FMLA at Easterseals, you are stating that you are unavailable for work due to your own illness or because you are caring for a family member. It is the policy of Easterseals that you may not work at any other entity while accepting FMLA from Easterseals. Violation of this policy will result in disciplinary action up to and including termination.

If an employee is unable to return to work after exhausting their available FMLA, they may be subject to a voluntary termination due to being unable to return from their leave. When the employee is able to return to work, the employee may be considered for any open positions for which they may qualify.

Intermittent or reduced schedule leave may be provided if the intermittent or reduced schedule leave is required for medical reasons and proper medical certification of the need is provided, and granting such leave does not present an undue hardship to Easterseals. Easterseals reserves the right to transfer employees to alternative positions while an employee is on an intermittent or reduced schedule leave that is foreseeable based upon planned medical treatment. Employees on intermittent leave may also be required to submit updated information at regular intervals to determine if the leave is still approved. Easterseals reserves the right to request doctor's notes to account for any intermittent FMLA-related absences from work.

It is the responsibility of the employee to report the use of Intermittent FMLA time to their management team, according to their department's policy and procedures for requesting time off. The employee must also report to Human Resources any FMLA time used at a minimum each Monday following the use of FMLA the prior week.

Failure to properly report FMLA time to both the employee's management team and Human Resources may result in the refusal of PTO/EIB usage, the FMLA time being denied, and considered an unexcused absence, which would be subject to disciplinary action up to and including termination.

If an employee does not qualify for FMLA leave and needs to take a medical leave for their own serious illness, they can request a General Medical Leave. If approved, Easterseals is under no obligation to hold open or return an employee to their position while out on a General Medical Leave.

General Medical Leave (Non-FMLA)

An employee with a serious medical condition, as defined under the FMLA, who is in their first year of employment and has completed the initial six-month orientation period, may request a leave of absence for a self-qualifying medical event. This leave will be considered for employees that need to be out of work for four or more consecutive days. Employees may request up to 12 weeks of leave within their first 12 months of service at Easterseals Midwest. Intermittent leave under Non-FMLA is not permitted unless such leave has been approved as a reasonable disability-related accommodation pursuant to the ADAAA.

An employee is expected to provide at least 30 days' notice to Human Resources when requesting leave. When an employee becomes aware of a need for leave less than 30 days in advance, the employee must provide notice of the need for the leave either the same day, the next business day, or as soon as reasonably possible. Leave requests that are not submitted according to policy and as soon as possible may be denied.

It is the responsibility of the employee to report their request for leave to both their management team, according to their department's policy and procedure for requesting time off, and to human resources.

Easterseals will require certification for an employee's serious health condition. The employee must return the completed paperwork to human resources within 15 calendar days of the paperwork being sent to them. It is the responsibility of the employee to ensure that any certification or other paperwork required for the approval of their leave and/or return to work is completed correctly and turned in to human resources by the indicated deadline. Failure to comply with the requirements mentioned above may result in denial of leave or reinstatement from leave, in which case the employee's leave of absence would be unauthorized, subjecting the employee to disciplinary action up to and including termination.

It is the responsibility of the employee to update their management team, according to their department's policy and procedure for requesting time off, and to human resources if there are any changes to their leave request, such as start date or return to work date. These updates must be given before the start of the employee's leave or within one business day of becoming aware of the change if their leave has already started.

The window of time requested for leave must be reviewed by the employee's management team for approval based on the business needs of Easterseals. If it is determined that the window of time requested cannot be approved, then the employee may be subject to voluntary termination of employment if unable to continue working or return to work if they began their leave on a pending basis.

An employee taking Non-FMLA Medical Leave must use all accrued time off (PTO and/or EIB) before being placed on unpaid leave. An employee will be required to use EIB at the beginning of the leave. If the leave continues after all accrued EIB has been used, an employee will be required to use accrued PTO before being placed in an unpaid leave status. Additionally, PTO benefits do not accrue during the leave.

Easterseals is not under any obligation to hold open or return an employee to their position while out on a Non-FMLA Medical Leave.

Employees on unpaid Non-FMLA Medical leave will be required to pay any employee premiums for health care coverage. Failure to pay such premiums may result in a lapse or cessation of coverage.

Employees who fail to return from Non-FMLA Medical leave may be required to repay any health insurance premiums paid by Easterseals during the employee's Non-FMLA leave.

By requesting and accepting Non-FMLA Medical Leave at Easterseals, you are stating that you are unavailable for work due to your own illness. It is the policy of Easterseals that you may not work at any other entity while accepting Non-FMLA Medical Leave from Easterseals. Violation of this policy will result in disciplinary action up to and including termination.

Employees are expected to be able to return to work by the end of their approved leave. Before returning from leave for a personal health condition, the employee must secure a release from their health care provider returning them to perform regular duties or setting forth any restrictions.

If an employee is not medically released to return to work at the end of their leave or if the employee fails to return to work as scheduled from a leave, their employment with Easterseals may be terminated effective the last day of the approved leave unless a continuation of leave has been granted as an accommodation under the ADAAA, or for other reasons.

Domestic or Sexual Violence Victim Leave and Accommodations

Easterseals Midwest will grant eligible employees leave under the Victims Economic Safety and Securities Act (VESSA).

Under VESSA, an employee is entitled to two workweeks of unpaid leave during a rolling 12-month period if they are either:

- A victim of domestic or sexual violence; or
- A family or household member of a victim of domestic or sexual violence whose interests are not adverse to the employee as it relates to the domestic or sexual violence. Household members are defined as a spouse, parents, children, or persons related by blood, marriage, or other people who share a relationship through a child and persons jointly residing in the same household.

Employees may request VESSA leave for the following reasons:

- Seeking medical attention for, or recovering from, physical or psychological injuries caused by domestic or sexual violence against the employee or the employee's family or household member;
- Obtaining victim services for the employee or the employee's family or household member;
- Obtaining psychological or other counseling for the employee or the employee's family or household member;
- Participating in safety planning, including temporary or permanent relocation or other actions to increase the employee or the employee's family or household member's safety from future domestic or sexual violence; and
- Seeking legal assistance to ensure the health and safety of the employee or the employee's family or household member, including participating in court proceedings related to the violence.

If a VESSA leave also qualifies for FMLA leave, the VESSA and FMLA will run concurrently. Leave can be taken all at once, intermittently, or, if the circumstances of the job permit, by working a reduced schedule. Employees should submit their request at least 48 hours prior to the need for leave. If an employee cannot provide advance notice, the employee must submit the request as soon as feasible under the circumstances. It is the responsibility of the employee to report their request for leave to both their management team, according to the department's policy and procedure for requesting time off, and to Human Resources. If there are any changes to a leave request, such as a start date or return to work date, these updates must be given before the start of the employee's leave or within one business day of becoming aware of the change if the leave has already started.

Easterseals requires a certification for leaves under VESSA. An employee may satisfy the certification requirement with a sworn written statement and any one of the following:

- Documentation from a victim services organization, attorney, health care provider, member of the clergy, or medical or other professionals who provided assistance to the employee or the employee's family or household member;
- A police or court record; or
- Other corroborating written evidence of the need for leave.

It is the responsibility of the employee to ensure that any certification or other paperwork required for the approval of their leave and/or return to work is completed correctly and turned in to Human Resources by the indicated deadline. Failure to do so may result in denial of leave or reinstatement from leave.

If the leave is for an employee's own serious health condition, the employee will be required to provide a medical release, with or without restrictions, in order to return to work. Employees are entitled to reinstatement to their former position or an equivalent position upon their timely return from eligible leave. Although the job an employee returns to may not be identical, it will offer the same working conditions, benefits, etc. An employee will not lose any seniority or benefits because of the leave.

While on leave, an employee will be required to use any available PTO unless the leave is certified as medically necessary for the employee. If the leave is medically necessary for the employee, accrued EIB will be used first. If the leave continues after all accrued EIB has been exhausted, an employee will be required to use accrued PTO. If no accrued time is available, then the leave will be unpaid. This means that, under certain conditions, an employee may receive pay for part or all of the time on a leave of absence.

PTO benefits do not accrue during a leave of absence. Employees on unpaid VESSA leave will be required to pay any employee premiums for health care coverage. Failure to pay such premiums may result in a lapse or cessation of coverage. Employees who fail to return from VESSA leave may be required to repay any health insurance premiums paid by Easterseals during the employee's leave.

By requesting and accepting VESSA leave, an employee is stating that they are unavailable for work. It is the policy of Easterseals that an employee may not work at any other entity while accepting VESSA leave time from Easterseals. Violation of this policy will result in disciplinary action up to and including termination.

If an employee is unable to return to work after exhausting their available VESSA leave time, they may be subject to a voluntary termination due to being unable to return from their leave. When the employee is able to return to work, the employee may be considered for any open positions for which they may qualify.

Intermittent or reduced schedule leave may be provided if the intermittent or reduced schedule leave does not present an undue hardship to Easterseals. Easterseals reserves the right to transfer employees to alternative positions while an employee is on an intermittent or reduced schedule leave that is foreseeable based upon planned time off. Employees on intermittent leave may also be required to submit updated information at regular intervals to determine if the leave is still approved.

The employee is responsible for reporting the use of Intermittent VESSA leave time to their management

team, according to their department's policy and procedures for requesting time off. The employee must also report to Human Resources any VESSA leave time used at a minimum each Monday following the use of VESSA leave time for the prior week. Failure to properly report VESSA leave time to both the employee's management team and Human Resources may result in the VESSA leave time being denied and considered an unexcused absence, which would be subject to disciplinary action up to and including termination.

Easterseals has a formalized procedure to review reasonable safety accommodation requests for our employees or applicants requiring VESSA support. Reasonable safety accommodation will be provided to individuals with known limitations resulting from circumstances relating to being a victim of domestic or sexual violence or being a family or household member of a victim of domestic or sexual violence if such accommodation would not impose an undue hardship on Easterseals or present a direct threat to our staff and/or the individuals we serve and would enable the individual to apply for, or perform, the essential functions of the position in question.

Any applicant or employee who requires accommodation to perform the job's essential functions should notify Human Resources to initiate the accommodation process. Easterseals will evaluate the need for accommodation and then identify possible accommodations, if any, that will help to eliminate the limitation or barrier. The individual requesting accommodation is required to fully cooperate with Easterseals in seeking and evaluating alternatives and accommodations. Easterseals may require a written statement certifying the purpose of the reasonable safety accommodation signed by the employee or an individual acting on the employee's behalf.

Military Leave

A leave of absence without pay for military duty will be granted to full-time regular and part-time regular employees of Easterseals Midwest pursuant to the Uniform Services Employment and Reemployment Rights Act (USERRA). The uniformed services include the Army, Navy, Marine Corps, Air Force, Coast Guard, Army National Guard, Air National Guard, Commissioned Corps of the Public Health Service, State active duty, and any other category of persons designated by the President of the United States in time of war or emergency.

If an employee is called to active military duty, Reserve, or National Guard duty or training or volunteers for the same, they must notify Human Resources and submit in advance copies of military orders. Employees will be granted a military leave of absence without pay for the period of military service in accordance with applicable federal and state laws. Eligibility for reinstatement after military duty or training is completed and determined in accordance with applicable federal and state laws, but in order to be reinstated, the employee must have provided advance notice of the military obligation and have completed their service honorably. In addition, employees who are members of the state military forces of Missouri, the National Guard of Missouri, or any other state, and members of any reserve component of the Armed Forces of the United States and are ordered to active duty are entitled to reemployment under the same conditions as provided by USERRA. Reinstatement benefits will be coordinated with the employee by Human Resources.

Emergency Responder Leave

Employees who serve with any fire department or fire protection district, including any municipal, volunteer, rural, or subscription fire department or organization, or any volunteer fire protection association, as a volunteer firefighter, or the Missouri-1 Disaster Medical Assistance Team, Missouri Task Force One or Urban Search and Rescue Team, or is activated to a National Disaster Response by the Federal Emergency Management Agency (FEMA), may take time off to respond to an emergency.

Time off under this policy will be without pay, except that exempt employees will be compensated as required by applicable law. Employees must make a reasonable effort to notify their supervisors that they may be absent from or late to work in order to respond to an emergency.

In addition, employees must provide Easterseals Midwest with a written statement from the supervisor or acting supervisor of the volunteer fire department or the commander of Missouri-1 Disaster Medical Assistance Team, or the FEMA supervisor, stating that the employee responded to an emergency and stating the time and date of the emergency.

Civil Air Patrol Leave

Any employee qualified for a civil air patrol emergency service specialty or certified to fly counter-narcotics missions will be granted a leave of absence to perform civil air patrol emergency service duty or counter-narcotics missions. Such leave may not exceed 15 working days in any calendar year. Easterseals Midwest reserves the right to request that an employee be exempted from responding to a specific mission.

Any employee seeking leave under this policy must notify Human Resources as far in advance of the leave requested as possible. This leave does not count as a loss of any regular leave or any other rights and benefits the employee is entitled to and is separate and independent of time spent responding to a state or nationally-declared emergency within Missouri.

Any employee receiving leave to perform civil air patrol emergency service duty or fly counter-narcotics missions will not receive pay during this leave, except that exempt employees will be compensated in accordance with applicable law.

Crime Victim Leave

Eligible employees may take time off from work to comply with a subpoena to testify in a criminal proceeding, attend a criminal proceeding or participate in the preparation of a criminal proceeding relating to a crime.

Employees are eligible for time off under this policy if they are: (1) the victim of the crime or juvenile delinquent act at issue in the proceeding; (2) a member of the victim's immediate family (i.e., the victim's spouse, child, sibling, parent, grandparent or legal guardian); (3) the victim's next of kin or guardian when the victim is deceased or disabled; (4) the family member of a minor, incompetent or a homicide victim; or (5) a witness to a crime who is summoned to testify for the prosecution.

Time off under this policy will not be compensated except that exempt employees will not incur any reduction in pay for a partial week's absence for leave to appear as a witness and will otherwise be paid in compliance with applicable law. In addition, employees will not be required to use any vacation, personal, or sick leave during the absence.

Bereavement Leave

An employee may take up to three days of EIB in the event of the death of an immediate family member. Immediate family members include spouse, parent, step-parent, sibling, step-siblings, domestic partner, and children. An employee may take one day of EIB in the event of the death of an extended family member. An extended family member is someone not listed above and could include a grandparent, in-law, cousin, or another relative. If an employee needs additional time off, available PTO may be used. If EIB is not available, the employee may use accrued PTO, and if that is not available, the time may be taken off unpaid. Employees may be required to provide documentation to their supervisor.

Jury Duty

Full-time employees called for jury duty will be excused from work and may use accrued PTO while on jury duty. This time is not considered time worked when computing overtime. Part-time employees are excused from work for jury duty but do not receive compensation from Easterseals Midwest. Jury duty pay from the court is retained by the employee. An employee should notify their supervisor immediately upon receipt of a summons for jury duty and must provide verification of jury duty.

Voting Time

Under Missouri law and subject to the following conditions, full and part-time employees will be permitted to take time off to vote. To qualify, an employee must give their supervisor notice one working day in advance of Election Day. The time off will only be granted at the beginning or end of the normal work schedule at the discretion of the supervisor. Time off to vote will not be granted to an employee who has a work schedule that allows three off-duty hours after the opening or before the closing of the polling place.

Wage and Hour Policies

We strive to pay salaries that are competitive with those in our community and industry, recognizing individual effort and contribution to the success of Easterseals Midwest. The organization's compensation plan classifies all positions in a series of relationships that reflect the relative requirements, responsibilities, contributions, and labor market realities.

Each position at Easterseals is in pay grade and salary range. The salary ranges are reviewed once a year and adjusted as necessary.

Job Descriptions

Human Resources maintain job descriptions and are available to employees through their supervisor. Job descriptions aid in staffing, wage and salary administration, and training. They also help employees and supervisors communicate about job responsibilities. However, job descriptions are not fixed and are only guidelines that can normally be expected to change over time.

From time to time, employees are expected to perform duties and handle responsibilities that are not part of their normal job. If, over time, the new duties and responsibilities remain a significant part of the assignment, the job description may be changed.

Pay Rates

Salary and wages will be based on the job classification and the salary guidelines for each position. Decisions on wages, salary increases, and benefits will be subject to the financial condition of Easterseals Midwest.

Definitions of Employment Status

The following terms will be used to describe the classification of employees and their employment status:

Exempt

Employees whose positions meet specific tests established by the Fair Labor Standards Act (FLSA) and applicable state law and are paid on a salaried basis.

Nonexempt

Employees whose positions do not meet FLSA and state exemption tests and who are paid based upon hours worked and are eligible for overtime pay for hours worked over 40 in a week.

Full-time

Easterseals Midwest standard to be full-time is 40 hours a week, but some areas may deviate from that standard due to programming needs. Direct Support positions in Community Connections' standard workweek is 38 hours; in Community Living, it is 36 hours a week. Such full-time employees are eligible for benefits after applicable service length requirements have been met.

Part-time

Employees who work less than the standard full-time workweek are considered part-time.

Temporary

Employees who are hired for a pre-established period of time not to exceed three months, usually during peak workloads or for vacation relief.

Direct Deposit

Easterseals Midwest requires all employees to have direct deposit.

Work Week

The normal workweek commences at 12:00 a.m. each Monday and ends the following Sunday at 11:59 p.m.

Pay Periods/Pay Dates

Easterseals Midwest pay periods are two weeks in length. The pay period begins on the Monday after payday and ends on the second Sunday.

Easterseals employees are paid every other Friday. An annual payroll calendar detailing the pay periods and corresponding pay dates is available in ADP by selecting the Resources link under the My Company tab. A new payroll calendar is published each year and uploaded to ADP.

Time Records

Easterseals Midwest requires all non-exempt employees to maintain a daily record of time worked. Such time records will be captured with an electronic time clock system and displayed on an electronic timecard. A timecard is a legal record of an employee's hours, and paychecks are based on the time recorded in these records. Each employee is responsible for clocking in and out on their timecard. Timecards can be viewed at any point utilizing the HR time system. Any addition, corrections, or change to a timecard must be made by the employee's supervisor.

Non-exempt employees who support individuals in Community Living (which includes 24-hour home sites, apartments, Independent Living, and Shared Living arrangements) are required to clock in and out using the device provided by Easterseals at the worksite. Clocking in using a personal cell phone is not acceptable unless the work location has an Easterseals designated app and the employee has been instructed by their supervisor to use that clocking method. Other circumstances when a cell phone may be utilized in Community Living to clock in with approval by a supervisor include, but are not limited to:

- A home or worksite that does not have a device
- Starting or ending a shift transporting an individual
- Arriving to a home or worksite and not being able to enter due to individual not being home yet

All non-exempt employees must record the time worked each day. Arrival, departure, and meal break times must be recorded accurately. Non-exempt employees are prohibited from working "off the clock" (i.e., without reporting the time worked). All work time must be reported. Non-exempt employees should not work at any time that is not authorized by their supervisors.

Each employee is responsible for their timecard. It is a violation of policy for anyone to instruct or encourage another employee to work "off the clock" to incorrectly report hours worked or to alter another employee's time records. If anyone directs or encourages someone to incorrectly report hours worked or alter another employee's time records, it should be reported immediately. An employee's failure or refusal to maintain an accurate time record is cause for disciplinary action up to and including termination.

Timecards are valid only if approved by the employee's immediate supervisor (or designee). Employees should review and approve their timecards. Each supervisor will establish deadlines that allow for timely review and submission of timecards. The employee must comply with the procedures and timelines established by their supervisor. Inaccurate timecards may result in delays in receiving pay up to the next pay period.

If an employee is on paid leave when a timecard is due, it is the employee's responsibility to submit the

appropriate time off request according to the procedures and deadlines established by their supervisor. A paycheck cannot be produced without a properly completed timecard.

Exempt employees are required to submit a time off request for all leave for which the employee is to be paid (PTO, EIB, FLMA, etc.)

All employees can review available PTO or EIB balances in the HR system.

Overtime Pay

Non-exempt employees who work more than 40 hours in a workweek will receive overtime premium pay for all hours worked over 40. All non-exempt employees must obtain approval from an appropriate supervisor before working overtime.

Easterseals Midwest utilizes the Department of Labor blended rate method to calculate the overtime premium rate of pay. Using the blended rate method, all applicable earnings from the workweek are combined and averaged by the number of hours worked to determine the regular rate. The overtime premium rate is 50% of the calculated regular rate. PTO and EIB time do not count as time worked for computing overtime.

Exempt employees are expected to work as much of each workday as is necessary to complete their job responsibilities. No overtime or additional compensation is provided to exempt employees.

Pay Advance

Easterseals Midwest partners with PayActiv to provide employees the opportunity to access a portion of their earned wages in advance of payday. Advanced funds will be deducted from the next paycheck. Employees can sign up for PayActiv through the PayActiv app, which can be downloaded on a smartphone or through their website: <https://www.payactiv.com/for-you/>

Pay Stubs

Paycheck stubs are available through the HR system. Employees should review each paycheck and pay stub when it is received to ensure that it is correct. Any questions about a paycheck or pay stub should be directed to payroll at payroll@esmw.org for assistance.

Payroll Deductions

Easterseals Midwest is required by federal, state, and some local laws to withhold certain deductions from an employee's paycheck. This includes income and unemployment taxes and FICA (social security and Medicare) as well as any other deductions required under law or by court order for wage garnishments. The number of tax deductions taken will depend on an employee's earnings and the number of exemptions listed on their W4. An employee may also authorize voluntary deductions from their paycheck for retirement plans, insurance premiums, spending accounts, or other services.

Circumstances may also require payroll deductions when Easterseals is owed funds by an employee. The following is a sample of the situations that may require a deduction but is not an all-inclusive list:

- An employee is overpaid. Any overpayment may be deducted in full from the following paycheck.
- An employee incurs a fine or fee, such as a parking ticket, while operating a company vehicle that is charged to Easterseals.

- Easterseals property is lost, damaged, or not returned per company policy at separation; the repair or replacement costs will be deducted from the employee's earnings. Deduction amounts related to the replacement of lost, stolen, or damaged equipment are determined by the IT department per the guidelines of the IT Agreement Form, which is reviewed and signed by employees when equipment is issued.

All deductions will be reflected in an employee's wage statement. If questions arise, contact payroll at payroll@esmw.org

W-2s

Easterseals Midwest prepares and distributes W-2s following the Internal Revenue Service (IRS) guidelines. Annual W-2s are mailed to the employee's home address on file in the HR system at the time of processing, which occurs in January. Employees can also access W-2s electronically through the HR system.

Wage Assignments/Garnishments

In compliance with federal and state legislation, Easterseals Midwest must accept liens, assignments, garnishments, and/or attachments against the wages of employees. Payroll will inform an employee that a wage levy has been issued and will automatically deduct the appropriate funds from the employee's paycheck.

City Earnings Tax

Easterseals Midwest adheres to the tax law guidelines of the City of St Louis and Kansas City pertaining to City Earnings Tax. The 1% City Earnings tax will be taken out of gross earnings for the following employees:

- Employees that reside in the city limits. This will be based on the physical address associated with the employee in our payroll records.
- Employees that work for programs providing services within the city limits. If time is split between a city location and a county location or any other location outside the limits of the city, the timesheet must reflect the different locations in order for the proper taxes to be withheld or not withheld.

Employee Communications

Suggestions

Easterseals Midwest encourages employees to suggest methods to improve quality and efficiency. Suggestions should be submitted in writing to the appropriate supervisor or submitted electronically to suggestions@esmw.org. Suggestions should be detailed so that the system or procedure can be adequately evaluated.

Problem Solving/Complaint Handling Procedure

Under normal conditions, if an employee has a job-related problem, question, or complaint, it should be discussed with their supervisor. The simplest, quickest, and most satisfactory solution often will be reached at this level.

If a discussion with the employee's supervisor does not answer the question or resolve the matter satisfactorily, the complaint may then be presented, verbally or in writing, to the next higher level of management. If the matter still is not resolved satisfactorily, the employee may present the complaint to the Chief Human Resources Officer or their designee, who will render a final decision on the matter after an appropriate investigation.

When the issue personally involves the supervisor with whom the employee would ordinarily discuss a problem, the employee may bypass that individual and proceed to the next person in authority without fear of reprisal. At any time, an employee may seek the advice and guidance of Human Resources. An employee may contact their designated Human Resources Generalist or email HR@esmw.org, and the appropriate representative will respond.

Difficulties in using this complaint procedure should be brought to the attention of the Chief Human Resources Officer or their designee.

Open Door Practice

Easterseals Midwest policies and procedures emphasize open-door practices in which employees are encouraged to deal directly with their supervisors, the Human Resources Department, and other members of management regarding complaints. Easterseals believes that its needs and those of its employees are best met by avoiding the addition of an outside third party.

Should an employee be unable to reach an agreement with management through the problem-solving/complaint procedure outlined above, all Easterseals personnel are required to agree and consent to submit any disputes, claims, or controversies that may arise out of application for employment, employment, and/or termination of employment with Easterseals to binding arbitration. Copies of the agreement and signature pages are made available as part of the New Employee Orientation process.

Employee Health and Safety

Easterseals Midwest seeks to provide a healthy and safe environment for all employees, individuals supported, and visitors. Employees are obligated to perform their jobs in a safe manner and to follow all safety rules and regulations.

Employees are expected to be completely familiar with safety requirements and practices for their job assignments and to seek guidance from their supervisor if they have questions.

Employees are to use proper techniques and body mechanics at all times for lifting or moving people or items. Employees are responsible for knowing and implementing the support needs specific to the individual they support to ensure their safety and well-being. Horseplay, wrestling, practical jokes, and other similar behavior are violations of safety practices.

Employees are responsible for reading the Occupational Safety and Health Administration (OSHA) posters in their work areas and complying with all applicable OSHA standards. Employees are to follow all safety and health regulations and to wear proper protective clothing and/or devices as required at all times.

Employees should report any hazardous conditions to their supervisor. If employees do not have access to the safety equipment required for their job or position, they must report the deficiency to their supervisor immediately.

Health and Safety of Individual Supported

Employees are mandatory reporters and have an obligation to intervene when necessary to protect the safety and well-being of those we support. Matters involving the health and safety of individuals supported by Easterseals Midwest must be brought to the attention of a supervisor immediately and, if necessary, to the respective Department Director. Failure to properly report may result in disciplinary action up to and including termination.

Fire Safety

Employees must be able to implement the safety plans for each worksite, paying particular attention to the location of fire extinguishers, emergency exits, and emergency escape routes.

Accident, Injury or Medical Emergency

Employees are required to report any accident, job-related injury, or illness, whether medical attention is required or not, to their supervisor immediately. The supervisor will assist the employee in receiving appropriate treatment and completing the required reports.

Vehicle and/or Personal Property Damage

Employees should not bring personal property to work that is not used for work-related activities. It is an employee's responsibility to safeguard their personal property.

It is required that every employee carry adequate automobile insurance on any personal vehicle used for Easterseals Midwest business. There may be occasions when a vehicle belonging to an employee may be damaged, through no fault of the employee, while the vehicle is being used for Easterseals' business. If this occurs, the employee's insurance policy is the primary coverage for this claim.

In instances where an individual's behavior results in damage to an employee's vehicle and/or other personal property, the employee should notify their supervisor immediately and provide a written account of the incident using the property incident report. The report should be turned in to the Risk Management Specialist. Each incident will be reviewed case-by-case to determine if the agency will cover the cost of repairing the damages incurred. Where applicable, the Program Director or Vice President, along with the

Chief Financial Officer or Chief Program Officer, will review submitted information and act as the liaison with responsible parties to resolve issues related to these incidents.

In cases where vehicle repairs are required, there must be three written estimates. Estimates must only be for damages caused by the reported incident. The third estimate must be from an Easterseals selected repair shop. In addition, a Property Incident Form and photos of reported damage must be submitted for consideration to the Risk Management Specialist. Once the incident report has been submitted, employees will be notified of the third estimate location. If approved, payments for repairs will be made to the company providing the repair services.

Worker's Compensation

Worker's Compensation benefits are provided to employees who suffer a work-related injury arising out of and in the course of employment. An employee who is injured on the job is to report the incident to their supervisor immediately for assistance and to the Risk Management Specialist within 24 hours or the next business day. It is the responsibility of the employee's supervisor to ensure that the injured worker completes and signs a Work Injury Report.

Any employee requiring injury care will be directed by the employee health nurse or other Easterseals representative in obtaining treatment. Any and all care related to workplace injury must be approved and authorized by an Easterseals representative before an employee seeks treatment.

If immediate emergency care is required, the employee should call 911. Supervisors must be alerted immediately when seeking emergency medical treatment. Employees who seek treatment on their own for injuries or illnesses that are not life-threatening may be responsible for the costs incurred for the unauthorized treatment.

Under the Missouri Worker's Compensation Law, the employer has the right to direct medical treatment to the employee. At Easterseals, the authorized medical care providers under Worker's Compensation differ from those available to the employee under their health insurance benefit program. An employee should not seek treatment from their personal physician for work-related injuries.

Easterseals requires employees to submit to drug and/or alcohol testing following a work-related incident or injury. Employees are required to be tested while at the office where they are being treated for the injury. Those declining treatment may still be required to report to occupational health for drug/alcohol testing. Failure to comply could result in disciplinary action up to and including termination. Worker's Compensation benefits will be reduced by the maximum amount permitted by law if a workplace injury was sustained in connection with the use of alcohol or drugs or other violations of Easterseals Substance Free Workplace policy.

Those employees unable to work regular duty will be provided with restrictions by an authorized medical provider. If restrictions cannot be safely accommodated at the employee's normal work assignment, the employee may be provided a Temporary Light/ Transitional Duty assignment by Easterseals. All wages at temporary assignment will be paid at the employee's regular rate of pay by Easterseals.

Employees who are off work due to an accident or injury that an authorized medical provider has taken off work or have restrictions in place that Easterseals is unable to accommodate may be entitled to lost wages benefits. As a part of these benefits, the first three days of an employee's absence following a work-related injury are compensated using the employee's PTO. Employees who are absent beyond three

full days shall be compensated by Easterseals' worker's compensation insurance at 66% of the employee's average weekly wage amount. A worker's compensation injury may be counted as FMLA leave. Employees off work should not return to their regular duties/assignments until the Risk Management Specialist has received the release paperwork.

Any employee working in a program that requires a physical examination may need to re-take the examination after a work-related accident or injury to ensure they can safely perform the work required.

Any employee who believes that they have been retaliated against for exercising rights under the Missouri Worker's Compensation Law should report any suspected retaliation to the Chief Human Resources Officer or their designee. Any report of retaliatory conduct will be investigated thoroughly and objectively. If a report of retaliation is substantiated, appropriate disciplinary action, up to and including termination, will result.

Communicable Diseases

Easterseals Midwest's decisions involving persons who have communicable diseases shall be based on current and well-informed medical judgments concerning the disease, the risks of transmitting the illness to others, the symptoms and special circumstances of each individual who has a communicable disease, and a careful weighing of the identified risks and the available alternative for responding to an employee with a communicable disease.

Communicable diseases include but are not limited to, measles, influenza, hepatitis-A, hepatitis-B, human immunodeficiency virus (HIV), AIDS, AIDS-related complex (ARC), leprosy, Severe Acute Respiratory Syndrome (SARS), including the SARS-CoV-2 (coronavirus), and tuberculosis. Easterseals may choose to broaden this definition within its best interest and in accordance with information received through the Centers for Disease Control and Prevention (CDC).

Easterseals requires that any employee diagnosed as having a communicable or infectious disease that may pose a direct threat to the health or safety of other individuals or who is unable to perform their job duties because of current disease or infection must inform Human Resources immediately. The employee must provide written verification from a licensed physician stating that the infectious employee does not (with or without accommodation) represent a health risk to others. Easterseals reserves the right to request a second opinion at our expense. Easterseals also require the use of Universal Precautions at all times.

Easterseals will not discriminate against any job applicant or employee based on the individual having a communicable disease. Applicants and employees shall not be denied access to the workplace solely on the grounds that they have a communicable disease. Easterseals Midwest reserves the right to exclude a person with a communicable disease from the workplace facilities, programs, and functions if the organization finds that, based on a medical determination, such restriction is necessary for the welfare of the person who has the communicable disease and/or the welfare of others within the workplace.

Easterseals will comply with all applicable statutes and regulations that protect the privacy of persons who have a communicable disease. Every effort will be made to ensure procedurally sufficient safeguards to maintain personal confidence about persons who have communicable diseases.

Infectious Diseases

Easterseals Midwest will take proactive steps to protect the workplace in the event of an infectious disease outbreak. Easterseals' goal during any such period is to strive to operate effectively and ensure that all essential services are continuously provided and that employees are safe within the workplace. Easterseals is committed to providing factual information about the nature and spread of infectious disease, including symptoms and signs to watch for, as well as required steps to be taken in the event of an illness or outbreak.

Preventing the Spread of Infection in the Workplace

Easterseals Midwest will ensure a clean workplace, including regularly cleaning objects and frequently used areas, such as bathrooms, gathering areas, conference rooms, door handles, and railings. A committee will be designated to monitor and coordinate events around an infectious disease outbreak and create work rules that could be implemented to promote safety through infection control.

It is expected that all employees will cooperate in taking steps to reduce the transmission of infectious diseases in the workplace. The best strategy to reduce transmission is frequent hand washing with warm, soapy water, covering your mouth whenever you sneeze or cough, and discarding used tissues appropriately.

Unless otherwise notified, normal attendance and leave policies will remain in place. Individuals who believe they may face a particular challenge reporting to work during an infectious disease outbreak should take steps to develop any necessary contingency plans. For example, employees might want to arrange for alternative sources of child care should schools close and/or speak with supervisors about the potential to work from home temporarily or on an alternate work schedule.

Temperature Screening

Employees may have their temperature taken upon reporting to work during an infectious disease outbreak. Each employee will be screened using a touchless forehead/temporal artery thermometer. An employee who has a fever at or above 100 degrees Fahrenheit will be sent home.

Limited Travel

During an infectious disease outbreak, all non-essential travel should be avoided. Employees who travel as an essential part of their job should consult with management on appropriate actions. Employees should avoid crowded public transportation when possible.

Telecommuting

Telework requests will be handled on a case-by-case basis. While not all positions will be eligible, all requests for temporary telecommuting should be submitted to your manager for consideration.

Staying Home When Ill

During an infectious disease outbreak, it is critical that employees do not report to work while they are ill and/or experiencing the following symptoms: fever, cough, sore throat, runny or stuffy nose, body aches, headache, chills, and fatigue. The Centers for Disease Control and Prevention recommends that people with an infectious illness such as the flu remain at home until at least 24 hours after they are free of fever (100 degrees F or 37.8 degrees C) or signs of a fever without the use of fever-reducing medications. Employees who report to work ill will be sent home in accordance with these health guidelines.

Requests for Medical Information and/or Documentation

If you are out sick or show symptoms of being ill, it may become necessary to request information from you and/or your healthcare provider. In general, we would request medical information to confirm your need to be absent, to show whether and how an absence relates to the infection, and to know that it is appropriate for you to return to work.

Confidentiality of Medical Information

Our policy is to treat any medical information as a confidential medical record. In furtherance of this policy, any disclosure of medical information is in limited circumstances with supervisors, managers, safety personnel, and government officials as required by law.

Social Distancing Guidelines for Workplace Infectious Disease Outbreaks

In the event of an infectious disease outbreak, Easterseals Midwest may implement these social distancing guidelines to minimize the spread of the disease among employees and those we support:

- Avoid meeting people face-to-face. Employees are encouraged to use the telephone, online conferencing, e-mail, or instant messaging to conduct business as much as possible, even when participants are in the same building.
- If a face-to-face meeting is unavoidable, minimize the meeting time, choose a large meeting room, and sit at least six feet apart. Avoid person-to-person contact, such as shaking hands.
- Avoid any unnecessary travel and cancel or postpone non-essential meetings, gatherings, workshops, or training.
- If you are working in an office, do not congregate in areas to socialize. Bring your lunch and eat at your desk or away from others.
- Minimize person-to-person contact as much as possible.

Emergency Conditions

This policy pertains to emergency conditions that may include severe winter weather, flooding, civil disturbances, pandemic events, or other notable events or incidents that have the potential to compromise the safety of our employees and the individuals we support or significantly disrupt operations.

Easterseals Midwest provides essential services and must be able to continue to meet the needs of those we support. As a result of these needs, Easterseals is always open. However, during emergencies, we may designate a period of alternate operations, which may result in the cancellation or suspension of programs, functions, or activities. Easterseals will allow employees to take appropriate time off if necessary for their safety and have empowered departments to implement flexibility to alter staffing and procedures in order to meet critical operational needs appropriately.

Alternate Operations

During a significant emergency event, Easterseals Midwest may declare a period of alternate operations. During this time, non-essential personnel may elect to take time off, and departments may alter their regular schedules or activities to accommodate the safety needs of staff, individuals served, and visitors. The decision to declare alternate operations will be made by the executive leadership team and communicated to all employees.

Essential Personnel

Easterseals Midwest defines essential personnel as the management and direct support professional staff who are required to report to their designated work location to ensure the operation of essential functions or departments during an emergency or when the organization has suspended or altered normal operations.

Due to the decentralized and complex nature of the Easterseals community, the designation of essential personnel will be determined at a local department level. Department management is responsible for

designating applicable employees as essential personnel based on their position and role in maintaining the department's essential functions.

These employees will be required to report to work to meet operational needs, regardless of conditions. At the discretion of department management, schedules and work assignments may be altered to meet the operational needs of the department. These alternatives may include changes in shift time or length of shifts, redeployment to another program work area, and temporary telecommuting options if applicable and appropriate.

Upon hire and before any anticipated emergency condition, employees who are designated as essential personnel should be notified of their designation by their managers. This designation will vary by department and role. Management within a department should be aware of which roles and employees are designated as essential personnel and review this functional designation on an ongoing basis. At all times, a departmental plan for operations under emergency conditions should be in place with these employees.

All Other Personnel

For employees who are not designated as essential personnel during emergency conditions and whose attendance is not required, management may decide that work may be completed from a remote location. If it is not feasible or necessary for an employee to work remotely, the employee may take PTO, and if they do not have PTO, the time off will be unpaid. If, during the workday, a department decides to send employees home due to emergency conditions, employees can use available PTO, and if they do not have PTO, the time will be unpaid.

Communication

Any decisions regarding alternate operations will be announced through our company email, on our social media channels (if applicable), and communication through other internal systems.

Any changes to specific departmental operations should be announced by departmental leadership through appropriate channels.

Responsibilities

Decisions about essential personnel and functions are made at the departmental level. Department leadership should have a plan in place to notify employees of any changes to operations or schedules through their normal chain of command. The following list includes but is not limited to, responsibilities expected under this policy.

Individual Employees:

- Discuss your position/role within the department with your supervisor to establish whether you meet the criteria of an essential employee, as outlined within this policy.
- If you are designated as an essential employee, make a personal plan and preparations for your expected attendance during any period of alternate operations.
- Remain in close communication with your supervisor to identify any needed changes to the expected schedule, roles, or responsibilities during alternate operations.
- If you are not designated as an essential employee, evaluate the current conditions to determine whether your commute to or from work can be made safely. If you are unable to report to work, follow normal departmental call-in procedures.

Supervisors and Managers:

- Discuss with employees to let them know whether they have been identified as essential employees upon hire and before any anticipated emergency condition.
- Develop a plan for staffing, including any teams or resources necessary to ensure the continuation of essential functions during alternate operations.
- Ensure all staff is familiar with established department call-in procedures.
- Communicate promptly with assigned personnel in anticipation of and during alternate operations to ensure clarity of expected schedules, roles, and responsibilities.
- Consult with department leadership and Human Resources for any questions related to this policy.

Directors and Department Leadership:

- Identify essential functions within the department that must be maintained during alternate operations in order to meet the needs of individuals supported.
- Develop a plan for identifying and communicating with essential personnel needed to ensure the continuance of essential functions.
- Establish appropriate telecommuting options and protocols for applicable staff that could work from home or another location during alternate operations.
- Communicate promptly with supervisors and managers in anticipation of and during alternate operations to ensure clarity of expected schedules, roles, and responsibilities.
- Regularly coordinate with and communicate potential significant operational changes or impacts (i.e., cancellation of programs, activities, events, etc.) to the appropriate executive leadership member.

General Policies

Inclement Weather

In the event of inclement weather, Easterseals Midwest may implement an alternate work schedule that will be determined by management.

Regardless of inclement weather conditions, Easterseals has a commitment to meet the needs of the individuals we support. Because of this, an employee may be required to report to a different program or work location during inclement weather. It is each employee's responsibility to make every reasonable attempt to report to work on such days.

If an employee is unable to get to work or complete a scheduled shift due to weather or transportation problems, they are responsible for contacting their immediate supervisor per department policy.

Business Travel

Any employee on an approved business trip for Easterseals Midwest shall be reimbursed for reasonable business-related expenses. Employees must submit requests for reimbursement per accounting guidelines.

Mileage Reimbursement

Mileage will be reimbursed at a rate set by Easterseals Midwest and is paid to employees who are transporting individuals or are on Easterseals business upon completion of required documentation. Employees must submit requests for reimbursement per accounting guidelines. As specified in the Department of Labor regulations, miles driven between the employee's home and primary workplace are not eligible for reimbursement, no matter what the distance.

Contracts

No employee may sign or enter into a contract for Easterseals Midwest or individuals served without approval from their Vice President or their designee.

Legal Issues

Easterseals Midwest employees will cooperate with any legal entity regarding subpoenas, search warrants, investigations, or any other legal action involving an individual served by Easterseals. Easterseals personnel will be assisted in any investigation process. Staff should contact their supervisor immediately if they become aware of any legal issue involving an individual served by Easterseals.

Legal Responsibility Policy

It is the policy of Easterseals Midwest that the Chief Human Resources Officer serves as the primary point of contact for all documents or inquiries regarding legal action or proceedings. The Chief Human Resources Officer will consult with appropriate parties as needed and coordinate the appropriate response.

Under no circumstance should an individual supported, employee, or volunteer attempt to answer any legal matter on behalf of Easterseals without consultation with the Chief Human Resources Officer. Individuals served record(s) may be released only to designated sources with the informed consent of the individual or their legal guardian. All appropriate HIPAA (Health Portability and Accountability Act) guidelines will also be followed for compliance.

Standards of Conduct and Corrective Action

Professional Standards

Easterseals Midwest has a tradition of high ethical and professional standards. These standards include competence, courtesy, cooperation, responsiveness, accuracy, effectiveness, efficiency, and compassion on the part of all employees. Each employee is expected to work cooperatively with management, co-workers, individuals supported, and external customers and vendors. Groups of people who are working together for any purpose require certain guidelines about their conduct and relationships. Accordingly, employees must be aware of their responsibilities to Easterseals, co-workers, and individuals supported.

Employees are responsible for maintaining high standards of conduct, cooperation, and performance. Supervisors and managers are responsible for organizing and directing the work of employees so that optimum quality and productivity can be achieved and maintained.

It is the policy of Easterseals that employees normally are given an opportunity to improve whenever behavior, productivity, or effectiveness fall below an acceptable level. Violations of standards may result in one of the following forms of corrective action: verbal counseling, written warning, suspension, or dismissal. In determining which disciplinary measure is appropriate, the seriousness of the infraction, the past record of the employee, and the circumstances surrounding the matter will be taken into consideration. This procedure addressing a performance or conduct issue does not preclude terminating an employee at any time if circumstances warrant.

Although there is no way to identify every possible violation of standards of conduct, the following is only a partial list of infractions that will result in corrective action, up to and including termination:

- Falsifying employment applications, timecards, personnel, or other Easterseals documents or records.
- Unauthorized possession of Easterseals or another employee's property, gambling, carrying weapons or explosives, or violating criminal laws on Easterseals Midwest property or in vehicles.
- Fighting, throwing things, horseplay, practical jokes, or other disorderly conduct which may endanger the well-being of others on Easterseals premises.
- Disclosure of confidential information of Easterseals or an individual supported.
- Engaging in acts of dishonesty, fraud, theft, or sabotage.
- Threatening, intimidating, coercing, or using abusive, offensive, demeaning, or otherwise unprofessional language toward others or interfering with the performance of other employees.
- Insubordination, such as refusal to comply with a supervisor's or manager's instructions or failure to perform reasonable duties which are assigned.
- Unauthorized use of Easterseals material, time, equipment, or property.
- Damaging or destroying Easterseals property due to careless or willful acts.
- Performance, which, in Easterseals' opinion, does not meet the requirements of the position.
- Negligence in observing fire prevention and safety rules.
- Sleeping or giving the appearance of sleep while on duty.
- Other circumstances for which Easterseals feels corrective action is warranted.

This list is intended to be representative of the types of activities that may result in disciplinary action. It is not intended to be comprehensive and does not alter the employment-at-will relationship between the employee and Easterseals.

Diversity, Equity, and Inclusion

Easterseals Midwest is committed to fostering, cultivating, and preserving a culture of diversity, equity, and inclusion.

Our employees are our most valuable asset. The collective sum of individual differences, life experiences, knowledge, innovation, self-expression, unique capabilities, and talent that our employees invest in their work represents a significant part of our culture and reputation as the leader in delivering disability support programs.

We embrace and encourage our employees' diversity in age, color, disability, ethnicity, family or marital status, gender identity or expression, language, national origin, physical and mental ability, political affiliation, race, religion, sexual orientation, socio-economic status, veteran status, and other characteristics that make our employees unique.

Easterseals diversity initiatives are applicable, but not limited, to our practices and policies on recruitment and selection; compensation and benefits; professional development and training; promotions; transfers; social and recreational programs; layoffs; terminations; and the ongoing development of a work environment built on the celebration of diversity, equity, and inclusion that encourages and enforces:

- Respectful communication and cooperation between all employees.
- Teamwork and employee participation permitting the representation of all groups and employee perspectives.
- Work/life balance through flexible work schedules to accommodate employees' varying needs.
- Employer and employee contributions to the communities we serve to promote a greater understanding and respect for diversity.

Each employee of Easterseals is responsible for treating others with dignity and respect at all times. Employees must exhibit conduct that reflects inclusion during work, work functions, and any other event or conference. All employees must also attend and complete annual diversity awareness training to enhance their knowledge to fulfill this responsibility.

Any employee exhibiting inappropriate conduct or behavior against others will be subject to disciplinary action, up to and including termination.

Any employee who believes they have experienced discrimination that conflicts with our commitment to diversity, our policies, or our initiatives should seek assistance from a supervisor or a Human Resources representative.

Harassment, Including Sexual Harassment

Easterseals Midwest believes that all employees have the right to enjoy a work environment free from all forms of discrimination and conduct, which can be considered harassing, coercive, or disruptive, including sexual harassment.

Harassment is a form of misconduct that undermines the integrity of the employment relationship. No employee should be subjected to unsolicited and unwelcome overtures or conduct, either verbal or physical, relating to age, color, disability, ethnicity, family or marital status, gender identity or expression, language, national origin, physical and mental ability, political affiliation, race, religion/spiritual beliefs, sexual orientation, socio-economic status or military/veteran status. Harassment does not refer to the occasional complaint of a socially acceptable nature. It refers to behavior that is not welcome or personally offensive, that lowers morale, and that, therefore, interferes with work effectiveness.

Harassment committed by supervisory or non-supervisory personnel is prohibited and against stated Easterseals policy.

Harassment is verbal or physical conduct that creates an intimidating, hostile, or offensive work atmosphere. Harassment may include any threat, implied or expressed, that affects an employee's employment, evaluation, wages, advancement, assigned duties, or any other condition of employment.

Sexual harassment may include any unwanted sexual advances or requests for sexual favors so that career development may appear to be dependent upon the performance of sexual favors.

Easterseals is committed to every employee being able to work in an environment free of discrimination or harassment. Therefore, it is expressly prohibited for any employee of Easterseals to engage in any discriminatory or harassing conduct in the workplace.

Easterseals particularly emphasizes the need to be sensitive to and considerate of the feelings of others. Statements and/or actions that may be intended as a joke or well-intentioned bantering by one person could be taken seriously or interpreted and considered offensive by another. Similarly, what may be intended as a compliment could be perceived as an unwanted advance by the recipient. And what may have been intended as an "innocent" gesture could be deemed offensive or invasive by the recipient.

Any employee who believes that they have been harassed should report the allegations immediately to either their supervisor or the Human Resources Department. All allegations of harassment will be promptly and thoroughly investigated. Appropriate disciplinary action, up to and including termination, will be taken, depending on the facts of the case. All information disclosed will be held in confidence to the extent it is practical to do so and will only be disclosed on a need-to-know basis in order to investigate and resolve the matter.

The policy also prohibits retaliation against employees who bring forward charges or assist in investigating charges. Any employee bringing forward a complaint or assisting in the investigation of such a complaint will not be adversely affected in terms and conditions of employment.

Employees making false or malicious claims will be subject to disciplinary action, up to and including termination.

Complaint Procedure

Any employee who believes that they have been harassed or discriminated against by a coworker, supervisor, agent, an individual supported or vendor of Easterseals Midwest, or who is aware of the harassment or discrimination of others should immediately provide a written or verbal report to their supervisor, any other member of management, or Human Resources. Easterseals will endeavor to protect the privacy and confidentiality of all parties involved to the extent possible, consistent with a thorough investigation.

After a report is received, a thorough and objective investigation will be conducted. The investigation will be completed, and a determination will be made and communicated as soon as practical to do so. It is expected that all employees fully cooperate with any investigation. Easterseals also expects that employees will provide truthful information when participating in an investigation and, during the investigation, will keep matters related to the investigation confidential. Remember, all good faith concerns and reports raised under this policy will be taken seriously.

If it is determined that this policy has been violated, remedial action will be taken commensurate with the severity of the offense. Appropriate action will also be taken to deter any future harassment or discrimination. If a complaint of harassment or discrimination is substantiated, appropriate disciplinary action, up to and including termination, will result.

Protection Against Retaliation

Retaliation is prohibited against any person by another employee or by Easterseals Midwest for using this complaint procedure, reporting harassment, or for filing, testifying, assisting, or participating in any manner in any investigation, proceeding, or hearing conducted by a governmental enforcement agency. Prohibited retaliation includes, but is not limited to, termination, demotion, suspension, failure to hire or consider for hire, failure to give equal consideration in making employment decisions, failure to make employment recommendations impartially, adversely affecting working conditions, or otherwise denying any employment benefit.

Please report any suspected retaliation to the Chief Human Resources Officer. Any report of retaliatory conduct will be investigated in a thorough and objective manner. If a report of retaliation is substantiated, appropriate disciplinary action, up to and including termination, will result.

Whistle Blower Protection Policy

Easterseals Midwest is committed to the highest ethical and professional standards of conduct. To achieve this goal, Easterseals relies on each employee to transact agency business in compliance with all laws, regulations, and agency policies related to their positions and areas of responsibility as well as on their behavior, honesty, integrity, and good judgment. Easterseals relies on employees to identify and report suspected improper activities. Knowledge of any conduct that is believed to be in violation of any law, regulation, policy, or procedure of any governmental entity should be reported to 1) the Chief Human Resources Officer or 2) Chief Executive Officer in order for the report or complaint to be effectively investigated. Although reporting is strongly encouraged, employees should exercise sound judgment with as much factual information as possible in making a report.

Anyone who, in good faith, reports or refuses to participate in a suspected or actual violation of the law, regulation, agency policy or procedure, or ethical or professional standards will be protected from retaliation as a result of such reporting, regardless of whether or not after investigation, a violation is found to have occurred. No employee shall discharge, demote, suspend, threaten, harass, or discriminate against the whistleblower for reporting what the whistleblower sincerely believes to be a serious actual or suspected violation or unethical act. This whistleblower protection extends to individuals who provide information in relation to an investigation of a report by a whistleblower. Insofar as possible, the confidentiality of the whistleblower will be maintained. Any act of retaliation shall be treated by Easterseals as a serious violation of policy, which will result in disciplinary action up to and including termination.

Workplace Violence and Weapons

Easterseals Midwest will not tolerate any acts of violence committed by or against any employee, individual supported, or visitor. Any employee determined to have committed such an act will be subject to disciplinary action up to and including termination.

Workplace violence is any intentional conduct that is sufficiently severe, offensive, or intimidating to cause an individual to reasonably fear for their personal safety or the safety of their family, friends, and/or property such that employment conditions are altered or a hostile, abusive or intimidating work

environment is created for one or several employees. Examples of conduct that may be considered threats or acts of violence include:

- Bullying or threatening physical or aggressive contact directed toward another individual;
- Threatening an individual or their family, friends, associates, or property;
- The intentional destruction or threat of destruction of Easterseals or another's property;
- Harassing or threatening phone calls, e-mails, letters, or other correspondence;
- Surveillance and stalking

To ensure a safe environment for employees, the people we support, and the general public, Easterseals prohibits the possession, wearing, transporting, storage, or presence of firearms or other dangerous weapons at our agency sites, offices, vehicles, including personal vehicles used to transport individuals supported and any agency-sponsored event. Possession of a valid concealed weapons permit is not an exemption under this policy. Any violation of this policy represents a serious case of misconduct and will result in disciplinary action up to and including termination.

In compliance with Missouri law, Easterseals permits employees who lawfully possess firearms to store or transport their firearms inside their locked, privately-owned vehicles in Easterseals parking lots, as long as such vehicle is not being used to transport individuals supported or for any agency-sponsored event. Such lawfully possessed firearms may not be removed from the employees' personal vehicle or displayed to others while the vehicle is on Easterseals premises.

Human Trafficking

Easterseals Midwest is committed to a work environment that is free from human trafficking, which includes forced labor or unlawful child labor. Easterseals will not tolerate or condone human trafficking in any part of the agency. Employees and anyone doing business with Easterseals must avoid complicity in any practice that constitutes trafficking. These activities include engaging in any form of trafficking in persons; procuring commercial sex acts; using forced labor in the performance of any work (even if this practice is legal in the jurisdiction where it transpires); using force, fraud, or coercion to subject a person to involuntary servitude; or obtaining labor from a person by threats of serious harm to that person or another person.

Easterseals also prohibits engaging in practices relating to trafficking in persons, including destroying or otherwise denying access to an employee's identity or immigration documents, using misleading or fraudulent practices to recruit employees, such as failing to disclose key terms and conditions of employment; using recruiters that do not comply with local labor laws; charging employees recruitment fees; failing to provide return transportation to certain employees who are brought to a country for the purpose of working on a US government contract; providing housing that fails to meet host country standards; and failing to provide an employment contract or work document where required by law.

Employees will follow all applicable laws in reporting trafficking and cooperate fully with all federal, state, and local agencies. Easterseals will take appropriate disciplinary action for violations of these rules, up to and including termination.

Patriot Act

In compliance with the USA Patriot Act and other counter-terrorism laws, Easterseals Midwest ensures that all funds and donations will be used in compliance with all applicable anti-terrorist financing and asset control laws and executive orders.

False Claims Act (FCA) - Medicaid Integrity Plan-Deficit Reduction Act

Pursuant to the Deficit Reduction Act of 2005, Section 6032, and Sections 3729 through 3733 of Title 31 of the United States Code, Easterseals Midwest, its employees, contractors, and agents shall comply with the federal False Claims Act and related state requirements. These policies and procedures may be amended to address requirements as directed by the State of Missouri and the Missouri Department of Social Services.

Policy

Easterseals Midwest is committed to following local, State, and Federal laws, rules, and regulations that address the prevention, detection, reporting, and correction of fraud, waste, and abuse of public funding. Complaints regarding acts that violate the False Claims Act, such as false claims or attempts to defraud health care programs, will be promptly reported, investigated, and remedied, as appropriate and required by law.

Definitions

Fraudulent and abusive claims activities may include:

- Knowingly billing for services not rendered;
- Knowingly including improper entries on cost reports;
- Knowingly assigning incorrect codes to secure higher reimbursement for services rendered;
- Knowingly characterizing unallowable services or costs in a way that secures reimbursement;
- Not seeking payment from beneficiaries who may have other primary payment sources;
- Knowingly falsifying, forging, altering, or destroying documents to secure payment;
- Knowingly concealing, avoiding, or decreasing an obligation to pay money to the government.

The terms "knowing" and "knowingly" mean that a person, with respect to information, (1) has actual knowledge of the information; (2) acts in deliberate ignorance of the truth or falsity of the information; or (3) acts in reckless disregard of the truth or falsity of the information, and no proof of specific intent to defraud is required. A person who is "material" to a false claim may also be considered to have intent in false claims activities.

Preventing and Detecting False Claims

All Easterseals Midwest employees, contractors, vendors, and agents are required to participate in the prevention, detection, and reporting of fraud, waste, and abuse of resources.

All individuals who engage in financial documentation and billing will be responsible for ensuring that information is accurate and does not constitute fraud, as defined above. Entities responsible for monitoring programs and services will also be responsible for verifying that documentation and billing is accurate and reflective of the services provided to individuals. Information that is not reconcilable and not intentionally falsified is to be corrected before submitting any billing. If it has been determined that a fraudulent or abusive act has occurred, the act is to be reported following the reporting procedures below.

Reporting Suspicions of Fraudulent Claims

If an employee, contractor, or agent of Easterseals Midwest believes that fraudulent billing for services as described above has occurred, it should be reported immediately to the Chief Financial Officer or their designee or to a member of Human Resources. All reports will be thoroughly investigated and remedied in a timely manner.

Reports of suspected or observed acts shall include:

- Name(s) of individuals involved in the suspected or observed fraudulent act
- When the suspected or observed fraudulent act occurred
- Where the suspected or observed fraudulent act occurred
- Which programs, departments, and/or individuals were affected by the fraudulent act
- A thorough description of the suspected or observed act
- Name(s) of individuals who have first-hand knowledge of the suspected or observed act
- Name(s) of other individuals who may have knowledge of the suspected or observed act

Protection for Reporting Fraudulent Claims

The False Claims Act provides protection from retaliation to employees who act as whistleblowers. An employee may not be discharged, demoted, suspended, threatened, harassed, or in any other manner discriminated against in the terms and conditions of their employment as a result of their furtherance of an action under the FCA, 31 U.S.C. 3730(h), and as defined in Easterseals Midwest Whistleblower Policy.

Retaliation against an employee or other reporting individual because that individual, in good faith, reported a violation or assisted in a complaint investigation is strictly prohibited. If an individual feels that retaliation has occurred, a complaint regarding the retaliation is to be filed with the Chief Human Resources Officer or their designee within forty-five days. If the employee can demonstrate that retaliation occurred, the False Claims Act provides for conditions for reinstatement, if applicable.

In addition, the False Claims Act provides for financial remedies to the employer when an action is brought forth for the purpose of harassment and/or the case is determined to have no merit. In these instances, the whistleblower may be responsible to recompense for legal fees and the costs of defense.

Administrative Remedies and penalties

Violations of this policy as well as actual wrongdoings in the areas of fraud, waste, and abuse, may have severe consequences, including, but not limited to, civil and criminal penalties as allowed under applicable federal and state laws, including the False Claims Act.

Attendance Standards

Attendance and punctuality are essential elements of efficient and effective job performance. Unscheduled absences disrupt work schedules, impose added work on others, and negatively affect the morale of the employees who are available.

An employee whose attendance record shows an unacceptable pattern of absences or tardiness will be notified of the problem. The employee will then be expected to be available for work based on standards established by the supervisor. Further disciplinary action up to and including termination will result if attendance standards are not met. The fact that the employee may have accumulated time off will not serve to diminish the severity of the problem nor the remedial actions taken.

Each work area will establish rules to address proper reporting of an unscheduled absence or lateness, early departure, and similar unavailability. Employees must familiarize themselves with the rules of their assigned work area and be sure to comply with those standards. Employees must personally notify their supervisor before the start of their scheduled work hours if they cannot be at work at the assigned time. This contact is to be made daily unless previous arrangements have been made between the employee and the supervisor.

Easterseals Midwest has the right to request a physician's certificate as verification of illness and inability to work.

Absence Without Notice

Easterseals Midwest requires that employees keep their department informed of their status when they are off work because of illness or accident from any cause. If an employee fails to notify the department after two days of consecutive absence, it will be assumed that the employee has voluntarily resigned, and the employee will be removed from the payroll. If an employee must leave work for any reason before the end of the day, they must inform the supervisor and wait for proper relief to ensure that the required level of supervision is maintained.

Children in the Workplace

Easterseals Midwest prohibits the presence of children in the workplace other than official company activities involving children. Employees with dependent children are expected to make arrangements for the proper care of their children while at work. It is inappropriate for children and other relatives of employees to remain in the employee's workplace during working hours. In addition, Easterseals property, whether owned or leased, should not be used in lieu of making appropriate childcare arrangements elsewhere. This policy is intended to minimize the disruption and intrusion for the people with disabilities that we serve, avoid the risk of harm to children, and reduce distractions affecting employee productivity.

Conflict of Interest

Easterseals Midwest expects employees to conduct business according to the highest ethical standards. Employees are expected to devote their best efforts to the interests of Easterseals and the conduct of its affairs.

Business dealings that represent, or appear to represent, a conflict between the interests of Easterseals and an employee are unacceptable. Easterseals recognizes the right of employees to engage in activities outside of their employment, which are of a private nature and unrelated to Easterseals' business. However, a policy of full disclosure must be followed to assess and prevent potential conflicts of interest from arising.

Conflicts of interest arise when an employee's objectivity in reaching, influencing, or making decisions for Easterseals is affected by factors other than Easterseals' best interests. Easterseals employees must contact their direct supervisor and the Human Resources Department about potential conflicts of interest.

Outside Employment

Employees are not permitted to perform duties for another employer or contractor while on the clock or during regular work hours for Easterseals Midwest. Outside employment, which creates a conflict of interest or affects the quality or value of an employee's work performance or availability at Easterseals, is prohibited. Easterseals recognizes that employees may seek additional employment during off-hours but expects, in these cases, that any outside employment will not affect job performance, work hours, scheduling, or otherwise adversely affect the employee's ability to perform their duties effectively. Any conflicts should be reported to management and Human Resources. Failure to adhere to this policy may result in discipline up to and including termination.

Solicitation and Distribution

Easterseals Midwest has established rules applicable to all employees and non-employees that govern solicitation, distribution of written material, political advocacy, and access to company property. Strict compliance with these rules is required.

- No employee shall solicit or promote support for any cause or organization during their working time or during the working time of the employee or employees at whom such activity is directed.
- No employee shall distribute or circulate any written or printed material in work areas at any time, during their working time, or during the working time of the employee or employees at whom such activity is directed.
- No employee shall engage in political advocacy in the workplace on behalf of a particular party's candidate, as this tends to be disruptive to operations and involve a subject over which the company has no control.
- Under no circumstances will non-employees be permitted to solicit or distribute written material for any purpose on company property.
- Off-duty employees are not permitted in areas not open to the public.

As used in this policy, "working time" includes all time for which an employee is paid and is expected to be performing services; it does not include break periods, meal periods, or periods in which an employee is not performing and is not scheduled to be performing services or work.

Substance Free Workplace

It is the goal of Easterseals Midwest to provide a drug-free, healthy, and safe workplace. Employees are required to report to work in a drug and alcohol-free condition and to perform their job duties in a safe and satisfactory manner.

Easterseals Midwest policy prohibits:

- The use, sale, attempted sale, transportation, distribution, manufacture, purchase, attempted purchase, possession, cultivation, and/or transfer of narcotics or other illegal drugs, alcohol, or prescription medication without a prescription or in a manner inconsistent with a prescription while working, while on-call, while operating a company provided vehicle or personal vehicle on company business, or when on company premises or the premises owned by the individuals served. "Illegal drugs" means drugs, the use and possession of which are prohibited as a matter of federal, state, or local law.
- Reporting to work in an impaired condition due to the consumption or use of drugs or alcohol.
- The presence of any detectable amount of prohibited substances in the employee's system while at work, while on company premises or the premises of the individuals served or while on company business. Prohibited substances include illegal drugs, alcohol, or prescription drugs not taken in accordance with a prescription given to the employee.

The activities of an employee during non-working hours are not subject to this policy; however, off-duty activities must not interfere with the employee's ability to perform the essential functions of their job. Use of medical or recreational marijuana, though legal in Missouri, does not exempt an employee from any provision or requirement of this policy.

Violation of this policy may result in disciplinary action up to and including termination.

Marijuana

Marijuana remains illegal as a matter of federal law, even though its use has been approved in Missouri for recreational or medical use. Because marijuana is federally illegal, Easterseals Midwest at all times strictly prohibits the use and possession of marijuana and marijuana products while working, while on-call, while operating a company-provided vehicle or a personal vehicle on company business, or when on company premises or the premises owned by the individuals served by Easterseals. Employees are

at all times prohibited from working while impaired by marijuana, including medical marijuana. Further, Easterseals may take adverse action based on confirmed positive test results for marijuana (including medical marijuana) when marijuana is in an employee's system or if an employee is working while under the influence of marijuana to the fullest extent permitted by law. Where applicable, Easterseals will comply with legal requirements to show impairment while working in addition to a positive test result for marijuana before taking adverse action.

Unless a failure to do so would cause Easterseals to lose a monetary or licensing-related benefit under federal law: 1) Easterseals will not refuse to hire an individual or take adverse action against an employee based on the individual's status as a qualifying patient or primary caregiver who has a valid identification card from Missouri; 2) Easterseals will fully comply with any reasonable accommodation, leave or other obligations with respect to medical marijuana users as may be required under applicable law, as well as with laws imposing employment protections/requirements for away from work marijuana use. These protections do not extend to applicants or employees in positions in which the legal use of lawful marijuana products affects in any manner their ability to perform job-related employment responsibilities or the safety of others or conflicts with a bona fide occupational qualification that is reasonably related to the person's employment.

Prescribed Medication

The legal use of prescribed medication is permitted on the job only if the use does not impair an employee's ability to perform the essential functions of their job in an efficient and safe manner that does not endanger them, their co-workers, those we support, or the public. This policy prohibits the misuse of prescribed medication during working hours. It is the employee's responsibility to ask their physician whether prescribed medications have the potential to affect their judgment or physical capabilities and to notify their supervisor if they are taking any medication that could make them a risk to themselves or others while performing their job duties.

Drug/Alcohol Testing

Easterseals Midwest reserves the right to test employees for drugs and/or alcohol in certain circumstances detailed below.

Reasonable Suspicion Testing

When there is reason to believe that an employee has violated this policy, the employee may be asked to submit to a reasonable suspicion drug and/or alcohol test. Requests for reasonable suspicion tests will be based on reasonably contemporaneous observations of the individual's behavior, performance, or other indications that this policy may have been violated. Examples of observations or facts that may trigger a request to submit to a reasonable suspicion test include, but are not limited to, one or more of the following:

- Observed suspected drug or alcohol abuse or misuse;
- Bizarre or erratic behavior, including unexplained violations of safety rules, unexplained changes in job performance, or a pattern of conduct that indicates substance abuse may be a problem;
- Observed suspected possession of alcohol, illegal drugs, or drug paraphernalia on Company premises or while working;
- Information provided by either a reliable and credible source or which is independently corroborated; and/or
- A physical appearance, smell, or symptoms that may indicate drug or alcohol abuse.

Individuals selected for reasonable suspicion testing will be provided with transportation to or escorted to the collection site and then provided with transportation home pending the outcome of the test result and any related investigation.

Post-Accident Testing

Any employee who causes or contributes to an accident that occurs during work time, on company property or involving company-owned or leased vehicles, or the use of a personal vehicle for company business will be subject to post-accident drug and/or alcohol testing as part of our investigation into the incident. Covered accidents include, but are not limited to, accidents that an employee caused or contributed to that involve:

- Personal injury to employees or others which necessitates first aid and/or medical attention beyond first aid; and/or
- Damage to company property is estimated by the company to equal or exceed \$1,000 in damage.

All such tests will be conducted as soon as possible after Easterseals Midwest learns of the accident but after any necessary emergency first aid has been provided. Drug tests will be commenced within 32 hours of the accident, and alcohol tests within 8 hours. Employees must report workplace accidents promptly pursuant to company policy and remain available for testing or may be deemed to have refused the test. An individual does not violate this policy if unavailable for testing because the individual is assisting others harmed in the accident to obtain emergency assistance or is receiving emergency medical care.

Employees in violation of the policy will be subject to disciplinary action up to and including termination.

Seeking Help

Employees are encouraged to seek help with any personal problem, particularly issues with substance abuse. To that end, it is our desire that employees self-refer to a treatment center. However, self-referral alone does not exempt an employee from the other directives of this policy, including disciplinary action up to and including termination for violations. Initiating participation in a substance abuse program after failing an employment-related drug test does not assure that an employee will be allowed to retain their position with Easterseals Midwest.

Cooperation with Testing

Refusal to submit to testing will be considered a violation of this policy and ordinarily will result in termination of employment. Attempts to tamper with, substitute, adulterate, dilute, or otherwise falsify a test sample or refusal to cooperate with testing personnel are considered refusals to submit to a test, as is a failure to appear at the testing location promptly after being asked to submit to a test.

Compliance with Applicable Law

Easterseals Midwest will administer this policy, including all drug and alcohol testing provisions, in a manner that complies with applicable federal, state, and local laws. If this policy differs from any legal requirement, Easterseals will follow the applicable law.

Confidentiality

Easterseals Midwest maintains confidential records for a variety of business needs. Records include detailed information about business methods, business plans, databases, systems, technology, intellectual property, know-how, management, business development, operations, services, research, development, financial statements, financial projections, financing methods, pricing strategies, agreements, individuals served relationship agreements, protected HIPPA information, and other information personal to individuals supported, confidential employee tax records, medical files, genetic information, and social security information contained in employee records, passwords, and access codes, system designs, terms and conditions of arrangements of any individual supported or vendor, and other proprietary information.

Maintaining this confidentiality is important to our competitive position in the industry and, ultimately, to our ability to achieve financial success and provide employment stability. Employees are expected to protect this information by safeguarding it when in use, filing it properly when not in use, and discussing it only with those who have a legitimate business need to know.

Each employee shall use all reasonable care to protect or otherwise prevent the unauthorized disclosure of such information. In no event shall confidential information be disclosed or revealed within or outside Easterseals without proper authorization or purpose. If an employee is uncertain whether certain information should be treated as confidential, the employee should presume that such information is confidential and not disclose it without proper authorization. Violations of this policy may lead to disciplinary action up to and including termination.

By accepting employment, an employee agrees that Easterseals will own any and all materials created by the employee for use in an agency program, presentation, or conference. It is our opinion that these are made on company time or with company assets, which relate to Easterseals' business, or that are required to meet its obligations and that the employee will assist Easterseals in perfecting and protecting its title to these materials.

Dress and Personal Appearance

Easterseals Midwest is known for providing professional and high-quality services in the community. To consistently reflect this to all who come into contact with the organization, Easterseals has created a dress code intended to support our employees with guidelines on appropriate dress.

While we respect the individuality of all our employees, we also expect each employee to follow the guidelines established in the policy so that the highest standards of safety, cleanliness, and professionalism can be maintained at all times. The nature of our service allows employees to dress informally and comfortably, but employees must also maintain a professional appearance. The focus should be on comfort and safety, but the attire should not be overly casual. Clothing should be clean and in good repair, of appropriate length, fit, fabric, and coverage suitable for the job duties being performed. Shoes should be in good repair. Personal hygiene should be exemplary.

Jewelry, including piercing jewelry, must be appropriate for the work environment and should not impair an employee's ability to perform their job duties or pose a safety hazard to themselves or others. Tattoos may not contain language, symbols, or pictures that are considered offensive, discriminatory, or harassing. Tattoos that may be deemed offensive or inappropriate must be covered using a suitable method.

The following list is not exhaustive but includes examples of items considered unacceptable in the workplace:

- Sheer or mesh clothing
- Strapless tops, low-cut tops, or muscle shirts
- Inappropriate or offensive writing or slogans on clothing
- Clothing that does not cover the midriff
- Cut-off shorts
- Shorts that are not at least mid-thigh in length (NOTE: shorts are not acceptable attire in the office)
- Skirts that are not at least mid-thigh in length
- Exposed undergarments
- Extreme hair color or style
- Scrubs
- Fingernails that are of a length that does not allow for work to be performed in a safe manner
- Open-toed shoes, sandals, flip-flops (when providing direct care)
- Slippers

Nothing in this policy is intended to prevent employees from wearing a hair or facial hairstyle consistent with their cultural, ethnic or racial heritage or identity. This policy will be interpreted to comply with applicable local, state, or federal law.

It is expected that employees will take into consideration their daily activities and dress accordingly. Employees must present a professional appearance when attending meetings, trainings, events, etc., out in the community.

Supervisors will be responsible for monitoring and enforcing this policy. If questionable attire is worn, the supervisor will hold a personal, private discussion with the employee to discuss the inappropriateness of the attire. If an obvious policy violation occurs, an employee may be asked to go home and change their attire immediately. Easterseals reserves the right to withhold pay during the time the employee is off correcting the issue. Employees who violate this policy may be subject to disciplinary action, up to and including termination.

Electronic Communication (Email) and Internet Usage

Easterseals Midwest provides electronic resources to employees for them to conduct agency business. Employees should never use agency-provided electronic resources that interfere with work or responsibilities to individuals served. Additionally, employees are responsible for using electronic resources effectively, ethically, and legally and for safeguarding them when they are in their possession.

E-mail and other information systems of Easterseals are not to be used in a way that interferes with their intended business use or violates the no-harassment or confidentiality rules of Easterseals Midwest. Employees must protect the privacy and security of confidential information.

All employees are expected to use their Easterseals e-mail address for all business communication. Business communications should only be sent through the Easterseals e-mail system. The e-mail or voice mail system should not be used to solicit others for commercial ventures, the employee's personal

business interests or causes, outside organizations, or other non-job-related solicitations unless approved in advance by a Department Director.

Sending, saving, accessing, or viewing sexually explicit images, messages, cartoons, or communications that contain ethnic slurs, racial epithets, or any content that may be construed as harassment or disparagement of others based on their race, religion, national origin, sex, sexual orientation, gender identity, age, disability, or political beliefs is prohibited. Defamatory or threatening communications are also prohibited. Violating this policy will result in termination and be considered gross misconduct.

Easterseals may, at any time, review activities or monitor employee communications that are transmitted on company devices. Easterseals reserves the right to review any employee's electronic and telephonic files and messages to the extent necessary to ensure electronic and telephonic services are being used in compliance with this policy and other agency policies and in compliance with the law. Employees should not assume electronic and telephonic communications are completely private.

The computers, electronic, and telephone services provided by Easterseals are for business use to assist employees in the performance of their jobs. Limited use of electronic media for personal reasons may be necessary, and all such use should be done in a manner that does not negatively affect the systems' use for business purposes. Personal telephone calls are to be kept at a minimum and should not be more than 2-3 minutes in duration. Personal calls should not be placed during normal working hours unless of substantial importance. Personal long-distance calls shall not be placed from Easterseals or individuals' served telephones; doing so without authorization may result in disciplinary action up to and including termination. Employees are expected to demonstrate a sense of responsibility and not abuse this privilege.

Internet usage is provided to employees for conducting work-related business. Incidental and occasional personal use is permitted but only on non-working time. This privilege should not be abused and must not affect a user's performance of employment-related activities. Non-business Internet activity must be restricted to the employee's non-business hours. Agency computers and electronic devices should not be used to stream music, stream non-work related videos, movies, or TV shows, play games, enter chat rooms or blogs, engage in day trading, or another business.

To prevent computer viruses from being transmitted through our computer system, unauthorized downloading of any unauthorized software is strictly prohibited. Only software registered through Easterseals may be downloaded. Employees should contact the IT department for a list of supported software. Except in cases in which explicit authorization has been granted by management, employees are prohibited from engaging in or attempting to engage in monitoring or intercepting the electronic or telephonic communications of other employees or third parties; hacking or obtaining access to systems or accounts they are not authorized to use; using other people's log-ins or passwords; and breaching, testing, or monitoring computer or network security measures. No personal computers or network devices of any kind may be connected to the Easterseals network without permission from the IT Department.

No e-mail or other electronic or telephonic communications should be sent that attempt to hide the identity of the sender or represent the sender as someone else. Electronic media and services should not be used in a manner that is likely to cause network congestion or significantly hamper the ability of other people to access and use the system. Anyone obtaining electronic access to other companies' or individuals' materials must respect all copyrights and cannot copy, retrieve, modify, or forward copyrighted materials except as permitted by the copyright owner.

All messages are Easterseals property, and we reserve the right to access and disclose all messages sent over its electronic mail system or voice system for any purpose. Management reserves the right to access an employee's e-mail or voice mail files whenever there is a business need to do so.

Employees waive their right of privacy in anything they create, store, send, or receive on Easterseals computer or telecommunications system. Employees consent to management accessing and reviewing all material employees create, store, send, or receive on the computer or telecommunications system.

Each employee is responsible for the content of all text, audio, or images that they place or send using Easterseals electronic resources. The same standards should be utilized for the creation of email messages as would be utilized for other Easterseals correspondence. All messages communicated should identify the sender and not be transmitted under an assumed name. Employees or other users may not attempt to obscure the origin of any message. Employees who wish to express personal opinions on the Internet should use personal email accounts and addresses from external systems.

Agency Provided Email Account

Effective communication is critical to the success of an organization, and to facilitate this, Easterseals provides all employees with an Easterseals email address to ensure important information is disseminated to all employees. Employees are expected to check their Easterseals email account regularly and are responsible for reading all communications in a timely manner. Easterseals will send important information about organizational news, benefits information, upcoming events, policy changes, etc., through the Easterseals email system. Easterseals Midwest email accounts should be checked at least once every shift that an employee is scheduled to work to ensure that important and timely communication is not missed.

Personal Use of Cell Phone, Computers and PDA's

Easterseals Midwest expects that employees refrain from the excessive personal use of cellular phones, computers, and PDAs. Personal calls, instant messaging, text messaging, or tweeting during work time interfere with employee productivity and are distracting to others. Easterseals understands that circumstances and emergencies may come up during the course of a workday that needs attention, but those are to be kept to a minimum. Personal calls and/or personal text messages, tweets, or instant messages should be handled on non-work time, and employees are to ensure that friends and family members are aware of this policy. If the excessive personal use of devices becomes an issue, it will result in disciplinary action up to and including termination. Easterseals is not liable for the loss of personal cellular phones, PDAs, or other personal electronic equipment brought into the workplace. A request for reimbursement of damaged equipment may be made, along with a copy of the incident report, to the Risk Management Specialist for review, but it is not guaranteed it will result in reimbursement. It is an employee's responsibility to safeguard their equipment.

Under no circumstances should a cellular phone or electronic device be used while transporting an individual or operating an agency-owned or leased vehicle. To receive or make a call, text, or email while driving, pull over safely, park, and then correspond. Violations of this policy will result in disciplinary action up to and including termination. Employees who are charged with traffic violations or cause accidents or injuries resulting from their use of cellular phones or electronic devices while driving will be solely responsible for all liabilities, fines, etc., that result, to the extent permissible under the law.

Social Media and Social Networking Policy

The purpose of this policy is to provide guidance to employees regarding the agency's use of social media while at work or involved in an agency-related capacity.

Unless otherwise specified, Easterseals Midwest, its divisions, offices, projects, and chapters will have only one Facebook page, LinkedIn account, Twitter account, YouTube channel, Vimeo channel, Instagram account, and blog. All social media content from the agency should be focused on these accounts, and all social media activity that is conducted under the name of Easterseals, its divisions, projects, and chapters must be pre-approved by Marketing and Communications. If Easterseals employees, divisions, projects, or chapters have compelling content for social media sites (Facebook, Twitter, etc.), it should be submitted to marketing@esmw.org. The marketing team will review and, if appropriate, adapt and post the content.

To ensure the delivery of an appropriate message and to avoid giving misinformation, a limited number of Easterseals employees are authorized to communicate with stakeholders on behalf of the organization through social media. The Marketing and Communications team regularly monitors internet spaces, including social media, for comments. Review services, such as Google, Yelp, etc., are intended for the use of consumers at Easterseals. If an employee has grievances about someone they work with or their work environment, this grievance should be sent to a supervisor or Human Resources for resolution. All employees are encouraged to report any items online that involve any unresolved follower questions, comments, or issues.

Unless permission has been granted by Marketing and Communications, employees are not authorized to post, blog, speak, or tweet on behalf of Easterseals or any of its affiliates. This includes but is not limited to, gaining approval to post anything regarding Easterseals imagery and information. Employees are encouraged to submit ideas for social media posts to Marketing and Communications. All suggestions will be considered based on relevance, schedule, and the criteria referenced above.

Employees who are approved to speak for Easterseals on its official social media accounts should adhere to the following guidelines:

- **Check your Sources:** It is important that Easterseals' social media pages contain honest and truthful information. Every effort to verify the source of information being posted should be taken to ensure the information is appropriate for publication. When appropriate, provide citations to sources in the publication.
- **Correct Errors or Omissions:** If you notice any errors or omissions, promptly correct mistakes and make a notation of the change. If you do not have the approval to make the change, please bring the error or omission to the attention of Marketing and Communications.
- **Reply When Appropriate:** While you cannot necessarily respond to every comment, it is important to be aware of what others are posting on our pages. If a post or comment requires a response, make an effort to respond promptly and respectfully.
- **Linking to Material:** When linking to any external material, use Bitly to create a shortened URL that links to the external material. When necessary, cite the source in the posting.

Personal Use of Social Media

Employees in any capacity (full-time, part-time, temporary, or contract) who maintain a personal social media site such as a Facebook page, Twitter account, YouTube account, or blog should follow the above-stated guidelines.

Be aware of the limits on your privacy. Employees do not have, nor should they expect, a right to privacy when they are using any agency-owned computer, network, or other equipment. Employees should assume that their social media activity will be viewed publicly, including by those whom they might not intend to view it.

What is posted – whether from work or home – can impact Easterseals Midwest’s reputation. As an employee of the agency, you are an ambassador for the organization, and your online presence (via images, posts, comments, etc.) can reflect on the agency’s mission and work.

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Respect the line between professional and personal. Employees may indicate that they work for Easterseals on personal websites and pages. However, the agency is subject to a number of rules and regulations governing the disclosure of certain information and does not want to publish information that might give competitors an unfair advantage. Employees may not post any trade secrets or confidential or proprietary information about the organization without authorization from the Vice President of Marketing and Communications. If employees have questions about what constitutes trade secrets or confidential or proprietary information, they should contact Marketing and Communications.

Employees may not represent themselves as a spokesperson for the agency nor make posts on the internet in the name of the organization or in a manner that could reasonably be attributed to the organization without prior authorization from their supervisor and the Vice President of Marketing and Communications.

Postings made by employees that are directly or indirectly related to the organization must include the following disclaimer: “The postings on this site are my own and do not represent Easterseals’ positions, strategies, or opinions.”

All postings should be fair and courteous to all persons, including colleagues, customers, vendors, or people who work on behalf of the organization. Employees are more likely to resolve work-related complaints by speaking directly with co-workers than by posting complaints on a social media outlet. Should an employee decide to post, avoid using statements, photographs, video, or audio that reasonably could be viewed as malicious, obscene, threatening, or intimidating or that disparage other people, including customers, employees, individuals served, or vendors, that might constitute harassment or bullying. Examples of such conduct might include offensive posts meant to intentionally harm someone’s reputation or posts that could contribute to a hostile work environment.

All postings should be honest and accurate. Corrections should be made openly and quickly. Never post any information or rumors that you know to be false about the organization, fellow employees, individuals supported, vendors, donors, and people working on behalf of Easterseals or competitors.

No references should be made regarding individuals supported, partners, vendors, funders, referral sources, and/or Easterseals employees without their express written permission. Agency logos and trademarks may not be used without the express written consent of the agency. However, sharing any content on your personal accounts that Easterseals originally posted is permissible and encouraged.

Consistent with any non-work activity that interferes with their work, employees’ use of personal social

media should not interfere with their jobs. Personal use of the Internet is restricted to non-work time, such as breaks and personal time. The organization understands that social media might replace the phone and other traditional forms of communication. For instance, an employee might check a Facebook page or Twitter account to ensure their children arrive home safely after school. When such social media use interferes with work, employees are expected to comply with a supervisor's request to diminish or suspend personal social media use during working time.

All proposed images or additions to Easterseals' social media accounts must adhere to applicable laws, including intellectual property, publicity, and privacy laws. Employees must comply with the law regarding copyright and plagiarism. The posting of someone else's work without permission is not allowed. Other relevant laws include those related to libel and defamation of character. Defamatory statements can lead to lawsuits against the author of such a statement and could potentially create negative publicity for the agency. Employees shall refrain from using ethnic slurs, personal insults, obscenity, or engaging in any conduct that would not be acceptable in Easterseals' workplace.

Violation of this policy may result in disciplinary action up to and including termination.

Use of Tobacco and E-Cigarettes

Our goal is to provide a smoke-free environment. In keeping with the goal of providing a safe and healthy work environment for our employees and individuals supported, Easterseals Midwest's policy prohibits smoking while on all company premises, in the presence of individuals supported, or while an employee is being paid for their work. Smoking is prohibited while transporting individuals, even if the person supported is a smoker. This includes using tobacco products such as cigars, pipes, cigarettes, and chewing tobacco and inhaling or exhaling smoke or vapor from electronic smoking devices or e-cigarettes.

This policy applies to all offices, training sites, and vendor locations occupied by Easterseals employees; all facilities where individuals supported reside, work, or occupy; all vehicles owned or leased to the agency as well as personal vehicles used to transport individuals supported; all agency-sponsored off-site conferences and meetings; all visitors to agency premises and all contractors and consultants and/or their employees working on agency premises.

Employees violating this policy will be subject to disciplinary action, up to and including termination.

Inspections

All items, including (but not limited to) packages, bags, briefcases, purses, and coats taken from or brought onto Easterseals Midwest property, may be inspected by management at any time. Illegal and/or unauthorized items will not be allowed and may be confiscated. An employee may not remove Easterseals property, including (but not limited to) discarded or excess items, from the premises without written authorization from management. Individuals refusing inspections may be detained until the matter is clarified.

Employees should be aware that Easterseals retains the right to inspect lockers, desks, offices, briefcases, files, and data stored on electronic media.

Sleeping While on Shift

Employees providing direct care are responsible for the safety and well-being of the individuals supported. In many cases, this requires 24-hour supervision and/or assistance, mandating employees remain awake and alert regardless of the shift. Supervisors are responsible for communicating whether or not an employee may sleep during a night shift. If an employee does not remain awake and alert at all times as

required or appears to sleep during their particular job assignment, disciplinary action up to and including termination will result.

Criminal Activity/Arrest

If an employee is involved in any criminal activity, it must be reported to a supervisor and Human Resources and may result in disciplinary action, including suspension or termination of employment. Disciplinary action depends upon a review of all factors involved, including whether or not the employee's action was work-related, the nature of the act, or circumstances that adversely affect attendance or performance. Any disciplinary action is not dependent upon the disposition of any case in court.

Employees are expected to be on the job, ready to work, when scheduled. The inability to report to work as scheduled as a result of an arrest may lead to disciplinary action, up to and including termination of employment, for violation of an attendance policy or job abandonment.

Any disciplinary action taken will be based on information reasonably available. This information may come from witnesses, police, or any other source as long as management has reason to view the source as credible.

Automobile Usage and Transportation

The following criteria must be met for all employees providing transportation to individuals supported:

- The employee must have a valid driver's license and present proof of such license upon hire and at renewal.
- The employee must furnish proof of at least the minimum liability insurance, per state law, upon hire and at renewal.
- The employee is responsible for maintaining their vehicle in a safe condition, including, but not limited to, required state inspections and licensing.
- It is the employee's responsibility to provide the Human Resources Department with copies of new driver's licenses and insurance cards upon expiration of the ones currently in the employee's personnel file.

Employees are required to follow all normal driving safety precautions (observing the speed limit, following proper distances, adjusting speed for weather conditions, etc.). Drivers need to focus on the road and eliminate distractions by not using cell phones or other electronics, eating, or doing anything that would take their concentration off safely operating the vehicle. Additionally, employees are responsible for the safety of those in the vehicle. This includes ensuring all passengers are transported according to all safety and individual plan goals (wearing seat belts, seated in proper position/location, etc.). Easterseals Midwest shall provide employees with a first aid kit that shall be kept in their vehicle at all times.

Employees are responsible for reporting any driving or other infractions resulting in loss of driving privileges immediately to Human Resources.

Whether operating one's own vehicle or an Easterseals vehicle, an employee is solely responsible for any and all tickets, offenses, fines, and penalties arising out of the operation of the vehicle. If an employee is on medication that may cause drowsiness or extreme fatigue, it must be reported to a supervisor immediately, and that employee should not operate a vehicle. Employees involved in preventable accidents will be subject to disciplinary action, up to and including termination.

Driving Record

All employees required to operate a motor vehicle as part of their employment duties must maintain a valid driver's license and acceptable driving record. Easterseals Midwest will run a motor vehicle record check to determine an employee's driving record upon hire and annually thereafter. Employees are responsible for providing a copy of their current driver's license for their personnel file. Any changes in an employee's driving record, including, but not limited to, driving infractions and suspensions, must be reported to Human Resources immediately.

Transporting Passengers Other Than Individuals Supported

Employees shall not transport passengers other than individuals supported unless authorized in advance to do so by management. Easterseals Midwest management will obtain guardian authorization as necessary. At no time should an employee transport a personal friend or family member while transporting an individual or while on work time. Failure to adhere to this policy may result in disciplinary action up to and including termination.

Personal Conduct with Respect to Individuals Supported

Easterseals Midwest seeks to provide the highest quality of service to the individuals we support. To reach this goal, each employee is expected to maintain the highest standard of job efficiency, responsibility, and professionalism. Employees must respect the cultural and religious diversity and preferences of the individuals we support.

Employees must uphold the highest level of conduct and integrity with regard to their relationships with the people they support and their families. The following, while not a complete list, are examples of unacceptable conduct which can lead to disciplinary action up to and including termination:

- Engaging in any conduct with an individual or their family that is in any way considered disrespectful, unethical, immoral, or illegal, including but not limited to physical, emotional, verbal, or sexual abuse, neglect, or theft. Acts of intimidation, coercion, discrimination, or harassment.
- Discriminating against individuals or their families because of race, creed, color, sex, sexual orientation, gender identity, religion, national origin, age, marital or veteran status, or the presence of any medical, mental, or disability condition.
- Stealing, misappropriating, mishandling, or deliberately destroying property or assets of the individual or their families.
- Soliciting or selling products or services to individuals or encouraging individuals to buy products or services from friends or relatives.
- Exposing individuals to any undue safety or health risk.
- Failing to support an individual in a manner consistent with their individualized service plan (ISP) or another treatment plan.
- Improper handling of an individual's confidential information and documents.
- Accepting cash or other gifts from individuals or their families unless approved by the Department Director.
- Failing to cooperate fully in any internal or external investigation, including knowingly making a false statement or omitting pertinent information.
- Improper handling of an individual's medications and/or related documentation.
- Failing to comply with applicable federal, state, and local statutes, rules, and regulations governing the care and treatment of individuals, their property, and confidential information.

- Engaging in horseplay that results in injury or emotional trauma to an individual.
- Engaging in the conduct of personal business while working with an individual where such personal business is reasonably interpreted to interfere with the individual's support.
- Involving individuals in religious, political, or charitable/fundraising activities against their will or not of their choosing.

Reporting Service Quality Issues

Easterseals Midwest is committed to providing the highest quality of service to the individuals we support. Everyone in the organization is responsible for ensuring our individuals receive quality services that meet Easterseals standards. If an employee feels that an individual is not getting the services in a manner consistent with Easterseals standards, they are obligated to make a report to their management team. If an employee feels that they cannot make a report to their management team, the employee should contact their Department Director, a representative of the Quality Team, or a member of Human Resources.

reasonable cause to suspect that a vulnerable person presents a likelihood of suffering serious physical harm or is the victim of abuse or neglect shall report such information to a member of Easterseals management or by contacting the Department of Health and Senior Services hotline at 800-392-0210 or the Children's Division hotline at 800-392-3738.

Information provided by the reporting employee will be treated as confidentially as possible. Failure to report, delays in reporting, or providing false information in the course of an investigation may lead to disciplinary action, up to and including termination. Easterseals prohibits any retaliation against employees who provide information or assist in an investigation.

Investigation of Employee for Abuse or Neglect

Employees who are currently under investigation by any agency or employer for abuse or neglect must inform their supervisor and Human Resources immediately. This may affect the employee's continued employment at Easterseals Midwest. Employees are required to cooperate with an internal investigation. Failure to abide by this policy will result in disciplinary action, up to and including termination.

Performance Improvement – Corrective Action

The Performance Improvement process is designed to be constructive and corrective and to promote employee success. It gives employees the information necessary to understand what aspect of work performance, attendance and/or behavior is unacceptable, identifies the improvements that are expected, and provides the opportunity for employees to demonstrate the expected improvements. The goal is to improve employee performance, attendance, or behavior and to assist employees in taking ownership of their job performance. It is the responsibility of the employee to adhere to the expectations outlined by the supervisor and to adhere to the standards of conduct.

In most circumstances, Easterseals Midwest attempts to give employees an opportunity to improve whenever behavior, productivity, or effectiveness falls below an acceptable level. Employees will generally be informally coached regarding performance concerns, but further disciplinary action will result if that does not result in improved performance. Violations of standards may result in one of the following forms of corrective action:

Verbal Warning

Performance deficiencies will be discussed, and expectations and a timeline for improvement will be established. The conversation will be documented in the personnel file.

Written Warning

Performance deficiencies will be outlined in writing with expectations, and a timeline for improvement will be established with the employee. The warning will be placed in the personnel file.

Final Warning

If conduct addressed by previous corrective action is repeated or additional problems occur, discipline may progress to a final written warning. However, a single incident may be so severe as to merit an immediate final warning. Performance deficiencies will be discussed, and expectations and a timeline for improvement will be established. The warning will be placed in the personnel file. If immediate and sustained improvement is not shown, it will result in termination of employment.

Suspension

Suspension is a more severe action that may be used to continue investigations and/or for constructive improvement. Suspensions are issued when it is determined that a second warning would not suffice or that an initial incident is too severe for a warning yet not sufficiently severe enough for termination. Suspensions are without pay and may vary in length according to the severity of the offense or deficiency. All suspensions will be documented in the personnel file.

Administrative Leave

Employees out of compliance with their required training or documentation may be placed on administrative leave until the situation is rectified. This time off will be without pay and cannot last longer than 30 days without written permission from Human Resources.

An employee who is under investigation due to allegations of abuse and/or neglect or other Human Resources related matters may be placed on administrative leave. If an employee is reinstated without disciplinary action, they may be eligible to use PTO to cover the time off with pay. Employees under administrative leave are required to cooperate fully with the investigation, and failure to do so can lead to disciplinary action, up to and including termination.

Termination

In most circumstances, an employee may be terminated after other disciplinary measures have failed, but when a first-time incident occurs that Easterseals Midwest deems serious, immediate termination may be warranted. An employee may be terminated at any time without regard to prior disciplinary steps if they commit an offense for which immediate termination is specified or if the employee's continued presence would, in management's opinion, be contrary to the well-being of Easterseals, its employees, or individuals served.

In determining which disciplinary measure is appropriate, the seriousness of the infraction, the past record of the employee, and the circumstances surrounding the matter will be taken into consideration. This procedure does not preclude terminating an employee at any time if circumstances warrant.

Separation of Employment

Easterseals Midwest adheres to equal opportunity in all personnel actions, including but not limited to separation of employment. Easterseals is an “at-will” employer and recognizes that employment may be terminated at the discretion of either the employee or Easterseals. It is neither the policy nor the intent of Easterseals to guarantee employment to any of its employees.

Leaving Service

Separation of employment is an inevitable part of personnel activity within any organization, and many of the reasons for separation are routine. In the case of resignation, employees are expected to give notice of their intent to resign and work their full notice period. Proper notice is defined as two weeks for non-exempt and exempt employees and four weeks for director and above positions.

At the time of separation, accrued PTO, up to 120 hours, will be paid out at a 50% rate if proper notice is given and the full notice period is worked. Employees cannot use PTO in lieu of working the full notice period. Employees that fail to work any of the assigned or required hours during their notification period of resignation will forfeit any remaining accrued PTO time and will not receive any payout.

PTO will not be paid out if an employee leaves within the first 12 months of employment; is terminated for misconduct, unsatisfactory performance, or violation of company policy; company property is not returned or has been damaged, or proper notice is not given. There is no payout for any Extended Illness Bank (EIB) accrued. An employee may not use PTO or EIB during the notice of the resignation period except for designated holidays.

Employees leaving service are to turn in their photo identification badge, keys, key cards, and any other property of Easterseals Midwest. These items must be collected, and payment of any unpaid debts owed to Easterseals must be made before a final paycheck will be released.

Any employee leaving service who has insurance coverage will receive a continuation of coverage packet in compliance with the Consolidated Omnibus Budget Reconciliation Act (COBRA), which will be mailed to the home address on file in ADP.

Voluntary Resignation

As a general practice, resignations must be submitted in writing. However, the verbal expression of an intention to discontinue employment will be considered a resignation. Resignations may not be retracted without the approval of the Department Director. Easterseals Midwest reserves the right to accelerate an employee’s notice, ending employment when Easterseals deems it appropriate. In such instances, Easterseals will determine whether or not the employee shall be paid for the notification period.

An employee who is absent without notice and does not arrange an absence with management for two (2) consecutive scheduled shifts will be considered to have voluntarily resigned, and it may be classified as job abandonment. If a part-time employee does not work during a three-month period, they will be considered to have voluntarily resigned. Also, if an employee fails to return from a leave of absence as scheduled, they will be considered to have resigned.

Staff Reduction

Staff reductions may occur as a result of a decreased need for certain services, reorganization, loss of funding, and redefinition or restructuring of jobs. If an employee is involved in a staff reduction, they should work with the Human Resources Department to investigate the possibility of a transfer to another position within Easterseals Midwest. An employee affected by a staff reduction will be given advance notice

whenever possible. However, it should be recognized that conditions leading to staff reductions can occur without advance notice.

Termination / Discharge

Although discharge ordinarily will not occur until after a warning has been given to an employee, terminations may occur without prior corrective or disciplinary measures if warranted by the circumstances. Reasons for discharge include but are not limited to unsatisfactory job performance or behavior, misconduct, neglect of job duties, frequent or excessive tardiness or absenteeism, or violation of policy.

Exit Interviews

Human Resources may conduct exit interviews with separating employees. If a program/department wishes to have exit interviews conducted with employees leaving the agency, the immediate supervisor or another department representative should contact Human Resources to arrange the exit interview on or before the last workday. Exit interviews may also be conducted at the employee's request. Information obtained from an exit interview is confidential and shared with members of management in summary form. Exit interview feedback does not become a part of the individual's personnel file.

Notes

Leading the way to 100%
equity, inclusion, and access
for people with disabilities,
families, and communities.



www.easterseals.com/midwest

Office of Human Resources | 1-800-200-2119 | hr@esmw.org