

West-Central Independent Living Solutions (WILS)

PERSONNEL POLICIES AND PROCEDURES

July 1, 2019/Updated October 23, 2024

I. MISSION AND PHILOSOPHY

A. Mission Statement– *West-Central Independent Living Solutions works to empower people with disabilities to achieve and maintain their independence.*

B. Core Services– WILS provides its consumers with the five core services:

1. Information and Referral
2. Advocacy
3. Peer Support
4. Independent Living Skills Training
5. Community Transitions for Youth and Adults

C. Independent Living Philosophy– The *Independent Living (IL) Philosophy* guides WILS' Policies and Procedures:

1. **Consumer Choice:** WILS educates consumers about options that might allow them to live more independently. They can choose to use what they have learned to set new goals. Through community advocacy, WILS works to expand the available range of choices.
2. **Consumer Control:** Once consumers have chosen the goals they wish to pursue, WILS assists them in accomplishing their goals. In this way, the consumers are in control, deciding what needs to be done and how to achieve it. WILS policies are strongly influenced by consumer needs and interests. Advocacy activities are consumer-controlled as well.
3. **Consumer Change:** (Self-determination) By learning to make independent choices and by taking control of their own decisions, consumers, with WILS' support and assistance, move away from unnecessary dependency. WILS itself, through

community education and advocacy, works to encourage removal of institutional and attitudinal barriers to full inclusion of people with disabilities in community life.

D. Other Guiding Principles– In addition to the IL Philosophy, WILS observes the following principles:

1. Full compliance with all applicable state and federal laws.
2. Consumer rights, interests, protections, and involvement as the primary concern of each policy. This concern extends to our consumers, their families, and their communities.
3. Consistency, fairness, and support in dealing with staff.
4. Commitment to the philosophy of independent living and policies that assure accountability to our guiding principles.
5. Mandated reporting. WILS employees are obligated to report any observed abuse and neglect displayed by staff, consumers, or other WILS participants (non-consumers.) In addition, all other aspects of the “mandated report” provisions in the law shall be followed.

E. Accessibility– WILS provides full physical, communications, and program accessibility to consumers, Board of Directors (Board) members, staff, volunteers, and the general public.

1. This policy applies to all WILS facilities, events, activities, and services. WILS will fully meet or exceed all statutory requirements related to such accessibility.
2. All non-confidential materials prepared by WILS for distribution to consumers, staff, Board members, volunteers, and the general public shall be made available, in an accessible format, upon request with 72 hours advance notice.

II. PURPOSE AND DEFINITIONS

A. Policies and Procedures Manual– This manual has been prepared for employees of WILS and approved by the WILS Board. This information is presented as a matter of information only. WILS reserves the right to modify, revoke, suspend, terminate or change any or all such plans, policies, or procedures, in whole, or in part, at any time, with or without notice. *This information is not intended to create, nor is it to be construed to constitute, a contract between WILS and any of its employees.*

B. At-will Employment– Employment at WILS is at-will. That is, either the employee or WILS may terminate the employment relationship at any time, with or without cause. Except by resolution of the Board, no employee or representative of WILS has any

authority to change the at-will employment relationship or make any agreement contrary to the foregoing.

C. Definitions– The definitions for paid employees are as follows:

1. A full-time employee is a person hired to work 40 hours per week.
2. A part-time employee is a person hired to work fewer than 40 hours per week.
3. A temporary employee is a person hired to work for 180 days or fewer.

III. HIRING, QUALIFICATIONS, AND INITIAL EVALUATION PERIOD

A. Equal Opportunity– WILS is an equal opportunity employer.

1. WILS is committed to ensuring equal opportunity and participation. All consumers, volunteers, employees, and applicants for employment will be treated consistent with Title VI of the Civil Rights Act of 1964 and applicable federal, state, and local laws. This policy applies to all levels of employment regardless of race, sex, gender identity, religion, national origin, disability status, age, or U.S. Veteran status. Explicitly included under the provision of disability are persons who are diagnosed as having AIDS or who are HIV-positive.
2. Equal opportunity employment at WILS will apply to all employees. The Board, administration, and employees of WILS shall share responsibility for ensuring equal opportunity employment.
3. The Immigration Reform and Control Act requires WILS to employ only American citizens and aliens who are authorized to work in the United States. This policy preserves jobs for those individuals who are legally entitled to them.
4. By grant regulations, at least fifty-one percent of the WILS staff must be comprised of individuals with a disability.

B. Authority for Hiring– The Executive Director of WILS is hired, supervised, evaluated, and, if necessary, dismissed by the Board. The Executive Director holds the authority for hiring, supervision, evaluation, and dismissal of all other positions. The Executive Director may delegate supervision and evaluation responsibilities to subordinates when appropriate. Creation of any new staff positions, and any decision to promote current staff to higher paid positions will require advance Board approval.

C. Position Openings– Job openings shall be publicized as widely as practicable. Applicants are to submit an application or resume for the position they are seeking, including personal and professional references who may be contacted. Employment shall

be based upon qualifications and competence, subject to WILS' obligations under its grants to provide employment to individuals with disabilities.

- D. Background Checks**– WILS requires background checks before hiring for any position. An applicant must agree to a criminal records check and a check of the Child Abuse/Neglect Registry, maintained by the Missouri Department of Social Services, before being hired. No person with a record identified by one or both of these checks may be hired without approval of the Board. WILS will additionally check the Department of Health and Human Services' List of Excluded Individuals/Entities on a monthly basis. Any employee whose name appears on the LEIE will be suspended without pay pending investigation, and will be subject to discharge.
- E. Nepotism**– WILS seeks to avoid conflicts of interest and the appearance of favoritism that can result from nepotism.
1. WILS will not take any adverse employment action against any employee for engaging in relationships with other persons, including familial relationships and other intimate relationships during nonworking hours away from WILS premises. However, WILS will consider such relationships when they affect job performance or occur during working time or on Agency premises. This policy particularly applies to supervisor/employee, service provider/consumer, and employee as an attendant relationships, but may also extend to any relationship between co-workers.
 2. WILS strives to eliminate the potential for conflicts of interest when employing individuals who are related to one another or in intimate relationships with one another. For purposes of this policy, a "familial relationship" means any of the following: parent, child, husband, wife, grandparent, grandchild, brother, sister, uncle, aunt, nephew, niece, first cousin, and any "in-law, step, or half" relationships within the preceding categories, any member of the employee's household, cohabiting couple/significant other. Based on concerns similar to those which exist for relatives, restrictions on employment apply to individuals involved in intimate relationships. For purposes of this policy, an "intimate relationship" shall mean an association between an employee and another individual including but not limited to, individuals who are dating, domestic partners, romantic partners or co-habitants.
 3. A familial or intimate relationship among a current employee and a job applicant, or between a current employee and a consumer, will not necessarily disqualify the applicant from employment or require the discharge of the employee. However, such relationships can create an actual or at least potential or perceived conflict of interest in the employment setting, especially where one relative, spouse, partner, etc. supervises or renders services to another relative, spouse, partner, etc. To avoid this problem, WILS may refuse to hire or place a relative or other intimately associated individual into a position where the potential for favoritism or a conflict of interest exists.

4. In other cases, where an actual conflict of interest arises, even if there is no supervisory or service relationship involved, the parties may be separated by reassignment or termination of employment, at WILS' discretion.
 5. If two employees, or an employee and a consumer who is receiving services from WILS, marry, become related, or enter into an intimate relationship, they may not remain in a reporting or provider/consumer relationship, or in positions where one individual may affect the compensation or other terms or conditions of employment of the other individual. WILS will attempt to identify other available positions, and the employees will have 14 days to decide which individual will remain in his/her current position. If no alternate position is available, the employees will have 14 days to decide which employee will remain with WILS. If this decision is not made in the time allowed, WILS will make the decision.
 6. Any circumstance of hiring someone with a familial relationship with another WILS employee will require Board approval.
- F. Offer Letters–** All new hires will receive an offer letter specifying their initial rate of compensation, employment status (whether hourly or salaried, part-time, full-time, or temporary), and any other special conditions applicable to their hire. All offer letters shall specify that employment with WILS is offered on an at-will basis.
- G. Orientation and Training–** After a candidate is selected for a position and a starting date is chosen, the immediate supervisor will be responsible for orientation and training of the new employee. The first 90 days of employment will be considered a introductory/review period. This 90-day introductory period will allow the Executive Director and the employee sufficient time to evaluate performance and assess working relationships. The employee or WILS may initiate separation at any time during the introductory period. A new-hire performance review will be completed after 90 days on the job, and will be used to determine the employee's status with regard to regular placement, extended evaluation, or termination. Extension of the evaluation period may be up to an additional 90 days, at which time a new performance review will be completed. This second review must result in a regular placement or termination. Failure by WILS management to conduct a review in a timely manner will not, however, assure a probationary employee of becoming a regular employee. Employees who complete the introductory period and become regular employees nevertheless continue to be employed on an at-will basis.

IV. PERSONNEL FILES AND JOB PERFORMANCE

A. Personnel Files–

1. A confidential personnel records file will be maintained for each employee of WILS. The personnel record files are to contain the original application/resume, as well as a complete record of classification and salary changes, medical leave, health insurance

records, evaluations, and other pertinent information regarding meritorious achievement or disciplinary action. The original copies will be maintained in a secure manner.

2. Information of a critical nature will not be entered or filed in the employee's personnel folder until the employee is given notice, as well as an opportunity to review the information and comment thereon. The employee will have the right to append a reply to the statement, which will also be included in the file.
3. Individual personnel files shall be accessible to employees within 24 hours notice to the Executive Director. Personnel files must be reviewed in the presence of the immediate supervisor or Executive Director. Confidential placement papers and confidential assessments obtained during the pre-hire background check process shall be excluded from employee review.
4. Personnel files are confidential to the extent allowed by law. Files are available only for the review of the individual employee, the employee's supervisors, and an authorized individual or a committee of the Board, legal counsel, or state agencies with authority. Supervisors and other employees handling personnel file information about co-workers are not to discuss this information, except when doing so is necessary in carrying out their assigned job duties.

B. Job Descriptions–

1. All full-time and part-time positions will have written job descriptions.
2. Job descriptions are to be reviewed periodically by management and updated as needed. All employees should review their specified responsibilities periodically and verify their accuracy.
3. Successful performance of the duties identified in each employee's job description will be used as one basis for employee evaluation.

C. Job Performance–

1. Each employee's job performance will be reviewed regularly with his/her supervisor. A formal review should be conducted at least annually. The Executive Director will participate in all formal reviews. Reviews are to include an examination of the employee's past performance and may include the establishment of goals for future performance. All performance reviews are to be signed by both the employee and the supervisor, indicating that they have communicated on the subject matter, though they may not have agreed. The Executive Director will approve each written review before it is placed in the employee's file.

2. The purpose of job performance reviews is to help employees understand their progress, strengths, and areas requiring improvement, with the objective of increasing each employee's overall effectiveness.
 3. During a new employee's 90-day probationary period, the supervisor should evaluate progress frequently, and any problematic situations should receive immediate attention. A formal performance review will be conducted before the end of the 90-day probationary period. If the employee's performance is acceptable but still needs development, the probationary period will be extended for up to another 90 days, and a new performance review will be conducted at the end of that period. If there is satisfactory completion of either probationary period, the employee's performance should then be reviewed on an annual basis.
 4. Unless immediate termination is warranted upon review of performance, individuals receiving a review of less than satisfactory will be required to develop a corrective action plan for improvement. Failure to improve performance to a satisfactory level will result in termination.
 5. The Board shall prepare an annual evaluation of the Executive Director. This evaluation should be based on the objectives established by the Board and the Executive Director the previous year. The initial review of the Executive Director shall be conducted by the President of the Board, and then presented to the full board for comment and evaluation. The Executive Director will meet with the Board in closed session to discuss the evaluation. The performance review will be signed by both the Executive Director and the Board President, indicating that they have communicated on the subject matter, though they may not have agreed.
- D. Reasonable Accommodations**– WILS provides reasonable accommodations for all employees with a disability, when such accommodations are necessary to enable any employee to perform the essential functions of his or her job.
1. **Definition of reasonable accommodations:** Logical adjustments made to the job and/or work environment necessary to enable qualified persons with disabilities to perform the essential functions of that position.
 2. **Determining Accommodations:**
 - a. Accommodations will be determined on a case-by-case basis, taking into consideration existing ADA guidelines.
 - b. Reasonable accommodations apply not only to selection and placement, but also are considered in recruitment, training, promotion, and reassignment.
 - c. Accommodations may be requested at any time. The employee's supervisor may approve accommodation expenses up to \$250. Expenses of \$250 or more require the approval of the Executive Director.
 - d. Criteria for the review of requests include the necessity of the accommodation in order to enable the employee to perform essential job functions, and the cost

effectiveness of the accommodation requested. Alternative accommodations may be considered.

- e. If reasonable accommodations are requested, employees will in most cases be asked to provide professional verification of disability and need for the accommodation. WILS will engage in an interactive process with the employee and his or her health care provider to select an appropriate accommodation.

E. Workshops, Conferences and Seminars—

1. WILS encourages employee participation in activities that foster professional growth and enhance the services offered to its consumers.
2. An employee desiring to attend a job related workshop, conference or seminar should submit information concerning the program to his/her immediate supervisor. A “Course/Seminar/Conference Request Form” shall be filled out and submitted to the immediate supervisor for approval. If an agenda is available from the training session, a copy shall be attached to the request form. All requests should be submitted and reviewed in a timely manner.
3. Reimbursement for employee expenses must get prior approval of the Executive Director.
4. Attendance at workshops, conferences or seminars shall be documented in the employee’s personnel file.
5. The Executive Director may request that the attendee share any information/paperwork obtained from the workshop/conference/seminar, and/or to train or educate co-workers about the information learned.

F. WILS Driving Policy—

1. **Driving while representing WILS:** Employees and volunteers who use their own vehicles, vehicles belonging to others, or are driven by other individuals, during the course of their duties at WILS will utilize the following policies and procedures:
 - a. The driver must hold a valid driver’s license,
 - b. The vehicle must have a valid registration and insurance,
 - c. The WILS representative must provide a copy of valid proof of insurance for the vehicle upon request,
 - d. The vehicle must have passed a current valid Missouri safety inspection,
 - e. The driver must follow all traffic laws and safety rules of the road,
 - f. The driver must refrain from using a cell-phone, two-way radio, or similar communication device while driving,
 - g. WILS van drivers will not transport consumers without permission from the Executive Director or other supervisor, and such transportation will occur only in a WILS-owned vehicle.

- h.** Should an accident or injury occur while an employee is driving while representing WILS, that employee will take the following steps:
 1. Report the accident to appropriate law enforcement.
 2. Take photographs of the accident scene and any property damage, if a camera or camera phone is available.
 3. Notify his/her supervisor and report the incident as soon after the occurrence as possible. If the employee's supervisor is unavailable to take the incident call, contact the Associate Executive Director or Director of Administration. The supervisor or administrator who receives an accident call must complete an incident report at the time of the call.
 4. Request a copy of the law enforcement officer's accident report.
 5. Provide the law enforcement officer's accident report and any photographs of the accident to the supervisor or administrator who was notified by the employee.
 6. Complete an incident report by the end of the work shift.

- 2. Driver Drug Testing:** WILS complies with the provisions of the Omnibus Transportation Employee Testing Act of 1991, which mandates that an organization test its drivers who are required to hold commercial drivers licenses under specified conditions. WILS will evaluate its policies and procedures to ensure that they remain in compliance with federal regulations.

G. WILS Seat Belt Policy-

WILS recognizes that seat belts are extremely effective in preventing injuries and loss of life. We care about our employees, and want to make sure that no one is injured or killed in a tragedy that could have been prevented by the use of seat belts.

1. All employees of WILS must wear seat belts when operating a Agency-owned vehicle, or any personal vehicle on Agency premises or on Agency business.
2. All occupants are to wear seat belts when riding in a Agency-owned vehicle, or in a personal vehicle being used for Agency business.

H. WILS Personal Auto Insurance Policy-

Employees of WILS who use their personal vehicle on behalf of WILS to conduct business shall be required to maintain the following personal auto insurance coverage.

- * \$100,000 per person bodily injury liability
- * \$300,000 all persons bodily injury liability
- * \$50,000 property damage liability

The employee needs to provide proof of the above coverage in the form of a certificate of insurance provided by their personal insurance company. The certificate needs to be updated annually. The auto coverage carried by the employee will be primary coverage in the event of an accident and the non-owned auto coverage of WILS will be secondary

coverage.

The insurance coverage of WILS is auto liability only and does not cover physical damage (comprehensive or collision) to the employee's auto.

V. HOURS OF WORK

A. Official Work Week–

1. The official work week for WILS is Sunday 12:00 A.M. thru Saturday 11:59 P.M.
2. Normal office hours are from 8:00 a.m. to 5:00 p.m., Monday through Friday, though this does not imply that these are an employee's actual hours of work.
3. A one-hour lunch break will be provided and should normally be taken from 12:00 PM to 1:00 PM, as workload and scheduling permits.
4. Variations to regular work hours or lunch breaks may be made, if approved by the employee's supervisor and Executive Director, depending upon the employee's responsibilities and duties.
5. Two work breaks daily, of not more than 15 minutes each, may be observed, as workload permits. Work breaks should be arranged so that WILS operations are not left unattended during the break period.
6. Employees are required to notify their supervisor or Executive Director in a timely manner when unexpectedly late or absent from the office. Whenever possible, such notification should occur before the start of the scheduled shift, and in any event must occur as soon as possible.
7. All absences and late arrivals are to be posted in the employee's timekeeping record and payroll files.

B. Overtime–

1. Compliance

- a. West-Central Independent Living Solutions will pay time and a half to nonexempt employees who exceed 40 hours of work time in a workweek.
- b. Paid leave, such as holiday, sick, or vacation pay does not count as time worked when determining eligibility for overtime premium pay.
- c. By law, WILS is not allowed to carry over excess hours and pay them in a later pay period for non-exempt employees. All time worked must be

compensated on the first regular pay day occurring after the current work period.

- d. Regular work hours are 8:00 a.m. to 5:00 p.m. unless otherwise approved. Employees must clock in no earlier than 7:53 a.m. in order to avoid overtime unless previously approved by his/her or her immediate supervisor. Every clock in and clock out uses 7-minute rounding. For example, clocking in at 7:53 a.m. will round to 8:00 a.m., and clocking in at 8:07 a.m. will round to 8:00 a.m.
- e. Although employees are normally scheduled for a 40-hour workweek, overtime payments do not commence until the employee exceeds 40 hours in a workweek.

2. Overtime Approval

- a. Employees are required to obtain approval from their supervisor prior to the use of overtime. Employees who anticipate the need for overtime to complete the week's work must notify their supervisors in advance and obtain approval prior to working hours that extend beyond their normal schedule. Although overtime payments do not commence until the employee exceeds 40 hours in a workweek, approval is required for hours that exceed 40 hours in a workweek.
- b. Employees must not work off the clock. Employees are required to report all hours actually worked, and will be paid for all hours actually worked. Hourly employees must not perform any work before clocking in or after clocking out.

3. Mandatory Overtime

- a. The employer may require employees to work extended hours.

4. Consequences of Unauthorized Overtime

- a. Employees who fail to obtain approval prior to working hours that extend beyond their normal 40-hour workweek will be subject to disciplinary action. Overtime offenses may result in termination.

C. Work Time/Record Keeping–

- 1. Each hourly employee must record all working hours in the timekeeping system or in approved circumstances on a time sheet. The timekeeping process should be followed or the completed time sheet is to be given to the employee's supervisor for approval on the last working day of each pay period. The supervisor will check the

time sheet for accuracy and give final approval. The approved time sheet will be forwarded to the payroll officer on the same day it is received.

2. Initially undetected timekeeping system or time sheet errors, resulting in improper payments (overpayment or underpayment), should be corrected as soon as detected so that pay adjustments may be made.
3. Employees leaving the office during the workday should inform office staff of how they can be reached.

D. Irregular Circumstances–

The Executive Director may close the office if irregular circumstances (weather conditions, power failure, etc.) occur. When such a decision is made and on-duty employees are advised of the office's closing, they will be compensated their regular wage for the hours that the office is closed, up to a maximum of eight hours per work day. If the office is not closed and an employee decides not to come in, or decides to leave earlier than the designated end-of-shift due to irregular circumstances, the employee will be required to use any available personal or vacation leave for time missed due to these types of circumstances, or if no vacation or personal time is available, the absence will be unpaid. When an employee schedules to be off prior to office closure, they will not be paid for the office closure and will be required to use their scheduled leave hours, as planned.

E. Temporary Remote Work–

Temporary remote work arrangements may be approved for circumstances such as inclement weather, special projects or business travel. These arrangements are approved on an as-needed basis only, with no expectation of ongoing continuance. Other temporary, short-term arrangements may be made for employees on family or medical leave to the extent practical for the employee and the agency and if appropriate, with the consent of the employee's health care provider. All temporary remote work arrangements are made on a case-by-case basis, focusing first on the business needs of the agency, and require approval of the Executive Director.

VI. EMPLOYEE COMPENSATION

A. Objectives–

1. WILS believes it is in the best interest of both our organization and our employees to fairly compensate our workforce for the value of the work provided.
2. WILS strives to use a compensation system based on the following criteria:
 - a. Current market value of a position

- b. Skills, knowledge, experience and actions required of a fully competent employee in the position
 - c. Performance of the employee in the position or previous positions
 - d. Funds available in the budget.
3. The compensation system used will be objective and nondiscriminatory in theory, application, and practice. WILS reasons that this can best be accomplished by completing an organizational salary range system.

B. Wages and Salaries–

1. Types of Compensation:

- a. Most WILS employees will be paid at an hourly rate. Some employees will be salaried.
- b. Employees paid at an hourly rate will be compensated using quarter-hour increments.
- c. Employees who are paid at an hourly rate will receive a minimum of 2 hours for call back pay.
- d. All bonuses are discretionary, based on WILS' financial status and employee performance, and require Board approval.

2. Compensation Criteria:

- a. The compensation system must be flexible enough to ensure WILS is able to recruit and retain a highly qualified workforce, while providing the structure necessary to effectively manage the overall compensation program and work within the budget.
- b. The salary range system will price positions to market by using current local and industry specific survey data.
 - The market data will include information from the Bureau of Labor Statistics, other local not-for-profit agency salary data, and comparable duty-specific data obtained from the State of Missouri. In addition, this data will also address market differences due to specific geographical locations.
 - The system will evaluate external equity. External equity exists when employees in an organization are compensated fairly in relation to those who perform similar positions in other similar organizations.
 - The system will evaluate internal equity. Internal equity exists when pay rates take into account the relative work level of each position in our organization, taking the required competencies, formal education and experience, responsibilities, and accountability for overseeing or managing other positions into account.

3. Salary Range Procedures:

- a.** WILS will conduct periodic salary review.
- b.** As part of the annual budgeting process, the Board will review and approve funds to be allocated for total compensation, which would include base salaries, bonuses, and benefits as recommended by the Executive Director.
- c.** The Board will set the pay range and specific components of the total compensation package for the Executive Director.

4. Salary Adjustments:

- a.** Each employee's salary should be reviewed as part of the job performance review process, or otherwise at least annually, and can be reviewed more frequently, as appropriate.
- b.** The determination for each employee's salary adjustment will be decided by the Executive Director in accordance with the salary range schedule system. The Executive Director will ensure that salary adjustments are administered in a consistent manner across the organization.

5. Payroll:

- a.** Payroll checks will be distributed on a bi-weekly basis, on designated alternate Fridays, over the 26 pay periods per year. When a payday falls on a holiday or weekend, employee paychecks will be distributed on the last working day before the established payday.
- b.** Direct deductions from payroll checks will include federal and state tax withholding, benefit deductions, and where applicable garnishments, and/or child support.

C. Reimbursement for Expenses–

- 1.** Employees are to be reimbursed for legitimate, reasonable, authorized expenses incurred while doing WILS business.
- 2.** Employees may request cash advances for known business expenses. Requests for cash advances should be made to the Executive Director. Otherwise, all employees are expected to pay their expenses for regular, day-to-day business expenses, and request reimbursement as explained herein.
- 3.** All requests for reimbursement are to be typed, signed, and submitted on a standard expense claim form to the appropriate supervisor for approval. The Executive Director will review and sign off on WILS Director's and Coordinator's expense reports. A member of the Board will sign off on the Executive Director's expense reports. Employees shall account for cash advances, if any, on the expense claim form.

a. Meals:

While traveling to conferences, workshops or educational meetings employees will be provided with a daily per diem to cover food and incidental expenses. The employee will need to submit an expense report with an agenda but will not be required to provide receipts. The allowable daily rate for all travel including gratuities is established by the IRS and are the rates used by WILS. See www.gsa.gov. On first and last days of a trip lasting several days a per diem rate of 75% of the daily rate will be paid. If meals are included in the conference fees the meal rate will be deducted from the daily per diem. Same day travel to attend training and meetings will be reimbursed at \$25 daily including gratuities. WILS credit cards should not be used for meals covered under the per diem structure. Tax exempt letters can be used.

- Extenuating circumstances may warrant reasonable allowances to be made by the Executive Director.
- Business Meals (WILS staff taking another agency staff for a lunch or dinner meeting) should be charged on a WILS credit card or be a reimbursed expense, and does not fall under per diem rates. Any business meal must be approved in advance by the employee's supervisor or the Executive Director. A restaurant or catering receipt with the following supporting documentation to prove the "business hospitality meal" is a true business expense will be required before the receipt can be processed (for IRS purposes):
 - The date of the meal
 - The name and location of the restaurant
 - The amount of the meal
 - The purpose of the meal
 - The number of people served
 - The identities of the persons who took part in meal
- Gratuities for business meals are allowed up to 15%, and must be clearly noted on the receipt.

b. Lodging and other related expenses:

- Employees are to be reimbursed for lodging when such is required for attendance at a conference or other duties outside the commuting area. Allowed rates established by the IRS are the rates used by WILS. See www.gsa.gov. A receipt from the hotel or motel will be required to accompany the expense claim. WILS will attempt to set up direct billing for lodging in advance, whenever possible.
- Lodging is to be selected on the basis of being the most economical, while still being practical in its location.

- All lodging should be booked directly with the hotel/motel so sales tax can be deducted. Travel sites (Expedia, Hotels.com, etc.) will not deduct sales tax, and should not be used.

c. Travel:

- When at all possible use WILS vehicles for travel.
- Employees will be reimbursed for mileage costs incurred when using their own vehicles for authorized work purposes while on duty, other than to and from work.
- Travel in personal vehicles will be reimbursed from the employee's home or office, whichever is closer, to the employee's work destination.
- The rate of mileage reimbursement will be equivalent to 90% of the Federal reimbursable rate.
- Reasonable costs for travel by bus, rail or other similar carriers for authorized work purposes, other than commuting, are also reimbursable.
- Economy parking at the airport is to be used for air travel.
- Spousal or companion travel expenditures are non-reimbursable expenses.

d. Miscellaneous Reimbursable Expenditures:

(Receipts are required for miscellaneous expenditures)

- Business telephone calls.
- Conference materials such as books and other resource material.
- Highway and bridge tolls.
- Internet use fees for business purposes.
- Parking fees.
- Tips for baggage handling.

e. Non-Reimbursable Expenses:

The following items will NOT be reimbursed by WILS:

- Alcohol.
- Political contributions.
- Companion expenses (including travel, meals, and additional driver costs on rental cars).
- Costs incurred at home, such as childcare, pet care, or lawn/home maintenance.
- Costs incurred due to unreasonable failures to cancel transportation or hotel reservations.

- Excess baggage charges for personal items (i.e. golf clubs, skis, over-weight luggage).
- Fines for parking or moving violations.
- Laundry services (if trip is less than five days).
- Life, flight, or baggage insurance.
- Lost or stolen personal property (including cash).
- Mini-bar items.
- Movies, golf, other personal entertainment.
- Personal expenses such as haircut, toiletries, clothing, etc.
- Snacks, personal reading material.
- Unnecessarily excessive costs (i.e. very expensive restaurants or exclusive hotels) not warranted by the circumstances.

D. Employee Recognitions and Acknowledgements-

1. The Executive Director may use discretionary funds to reward employees for outstanding performance that advances the WILS mission.
 - a. The reward should be tied to a specific accomplishment.
 - b. The form of the reward may vary so that it is meaningful to the individual earning the reward.
 - c. Care should be taken in communication and distribution of rewards so they are not viewed as entitlements.
 - d. Rewards should not be a substitute for a competitive salary plan that should include permanent salary adjustments that reflect any significant changes in responsibility, increased value of position, or internal pay equity.
2. The Executive Director may use discretionary funds to acknowledge significant life events of an employee. Such events may include, but are not limited to, the following:
 - a. Bereavement,
 - b. Hospitalization,
 - c. Birth of a child or adoption of a child.
 - d. Retirement,
3. Rewards or gifts should be distributed using the following guidelines:

Monetary Value*	Pre-Approval Required	Recommended Frequency per Person/Team	Taxable
Under \$5 (Letters, cards,	None	As often as appropriate	No

etc.)			
Under \$100	Executive Director	One time per year	Perhaps
\$100-\$300	Finance Committee		Yes
Over \$300	Board		

*Gifts and cash are considered taxable by the IRS and should be processed through the payroll department so there are appropriate withholdings.

VII. EMPLOYEE BENEFITS

A. Eligibility– All full-time employees are eligible for WILS benefits.

B. Insurance Benefits–

- 1. Workers compensation:** All employees are covered by Workers Compensation Insurance.
- 2. Medical:** WILS provides medical insurance for all full-time employees effective on the first of the month following hire date. Employees who work 30 hours per week or more will be considered full-time for purposes of eligibility.
- 3. Dental/Vision:** WILS provides dental and vision insurance for all full-time employees effective on the first of the month following hire date. For dental and vision insurance, employees who work 30 hours per week or more will be considered full-time for purposes of eligibility.
- 4. COBRA:** Employees shall be given information regarding COBRA benefits at the times of employment and separation.
- 5. Unemployment Insurance:** Unemployment insurance is provided at no cost to WILS employees.
- 6. Life Insurance:** WILS provides \$25,000 of life insurance at no cost for all full-time employees. For life insurance, employees who work 30 hours per week or more will be considered full-time for purposes of eligibility.

C. Retirement: WILS contributes a base of 2% of each employee's salary into a 401k retirement plan for that employee – after successful completion of 3 months of Eligibility Service. WILS will also match up to an additional 2% of each employee's own contribution for a total of 4% maximum contributed by WILS. There is also a Roth 401k feature available with the retirement plan.

D. Employee Assistance Program (EAP): WILS provides an Employee Assistance Program to help employees and their household dependents with counseling services, self-help resources, and coaching and training programs.

E. Flexible Spending Account (FSA)/Flexible Spending Account Dependent Care (FSA-DC): All full-time employees who have completed their probationary period (typically 90 days) are eligible to participate in the FSA and FSA-DC programs. The FSA allows you to set aside pre-tax dollars for eligible medical, dental, and vision expenses for you and your dependents. The FSA-DC allows you to set aside pre-tax dollars for dependent care expenses such as daycare.

F. Leave– All eligible employees accrue paid annual vacation and sick leave from the initial day of their employment.

1. Paid Vacation:

- a. All full-time employees earn paid vacation at the rate of 8 hours per month during the first three years of service, 10 hours per month from three up to six years of service, 12 hours per month from six up to ten years of service, 14 hours per month from ten up to fifteen years of service, and 16 hours per month from fifteen years of service and thereafter.

Paid Vacation		
Full-time employees earn paid vacation as follows:		
Years of Service	Hours earned per month	Maximum accumulation of Paid Vacation
0-3	8	160
3-6	10	160
6-10	12	160
10-15	14	168
15 Plus	16	192

- b. To request a paid vacation, the employee shall complete a leave request and present it to the employee's supervisor for approval. Vacations longer than 2 consecutive weeks require prior written approval from the Executive Director.
- c. Paid vacation will be entered in the employee's timekeeping record.
- d. Employees may cash out up to a maximum of 40 hours annually (per calendar year) of earned vacation at current regular rate of pay provided at least 40 hours of leave remains to cover unanticipated absences. Paid leave will not be extended beyond leave earned.
- e. Upon termination of employment, unused vacation days shall be paid out at the employee's hourly rate at the time of departure. If the termination is employee-initiated, the employee must give proper notice as described in Section XI, Separation from Employment, in order to be eligible for pay-out. Employees shall not be paid for vacation in lieu of taking time off while they are employed.

2. Sick leave:

- a. All full-time employees earn 8 hours of sick leave per month, with unused sick leave accumulating to a maximum of 60 days (480 hours).

- b. An employee may use earned sick leave benefits under the following conditions:
 - When the employee is unable to perform duties due to his or her own illness or injury;
 - Necessity of medical or dental care of the employee or child;
 - Serious illnesses of the employee's spouse, significant other, children, or parent.
 - c. When an employee is unable to report to work because of personal illness, the employee must notify their supervisor no later than 30 minutes prior to their normal starting time on that working day. Failure to give appropriate notification, without reasonable excuse, may result in disciplinary action. Further, the employee may be disqualified from drawing on sick leave benefits to which the employee might otherwise be eligible. On the day of return, leave hours must be entered in the timekeeping system for the immediate supervisor to approve.
 - d. If an employee becomes sick during office hours, he/she is to advise a supervisor before leaving the workplace.
 - e. Employees may be required to provide a physician's statement of the nature of the illness and a release for the employee to return to work.
 - f. Sick leave has no cash value upon separation of employment for any reason. There will be no pay-out associated with accumulated but unused sick leave.
 - g. Employees may convert up to five sick days per calendar year to personal days so long as they maintain a sick leave balance of 40 hours or more.
 - h. At the termination of employment, personal days have no cash value and there will be no pay-out associated with personal days, nor can an employee convert personal days to vacation at termination.
3. **Leave record:** Employees will receive copies of their pay stubs showing their accumulated paid vacation and sick leave balances.

4. **Family and Medical Leave Act Policy:**

- a. An employee is eligible for Family Medical Leave (FMLA) if he or she:
 - has been employed by WILS for a minimum of 12 months, and;
 - has at least 1,250 hours of service for WILS during the 12-month period immediately preceding the leave.
- b. An eligible employee of WILS is allowed to take job protected, unpaid leave, for up to a total of twelve (12) work weeks, in one continuous 12 week block of time, or intermittently, during any rolling twelve (12) month period, for any of the medical circumstances defined in the Family Medical Leave Act (FMLA) of 1993, as amended.
- c. Approved reasons for unpaid leaves of absence include any of the following:
 - Birth of a child and related newborn care for the child;
 - Placement with the employee of a child for adoption or foster care;
 - Care for a spouse, dependent child, or parent who has a serious health condition;

- A serious health condition that makes the employee unable to perform the essential functions of his or her job;
 - Any qualifying exigency arising out of the fact that a spouse, dependent child, or parent is a military service member on covered active duty or is called to covered active duty status.
- d. When an eligible employee is the spouse, child, parent, or next of kin of a military service member, the employee may also take up to 26 work weeks of FML during a single 12-month period to care for the covered military service member during the service member's serious injury or illness related to the service member's military service.
- e. An eligible employee must give notice to WILS in order to initiate FML unless it is initiated by WILS based on knowledge of a qualifying event.
- WILS requires at least 30 days advance notice before FML is to begin if the need for the leave is reasonably foreseeable (which is typically the case when the leave is based upon expected birth or adoption of a child, or a planned medical treatment for a serious health condition of the employee or a family member). In a medical emergency, or other circumstances where a 30-day notice is not practical, notice must be given as soon as the employee is aware of the need to request Family Medical Leave.
 - The employee can obtain a FMLA Request Form from Human Resources. Notice will be served by the completion and submission of an FMLA Request form to the Human Resources department. To support the request for FML, WILS will require that a Certificate of Health Care Provider form or letter from a health provider be completed and returned within 15 days.
 - WILS will respond in writing within five (5) days of receiving the FMLA Certificate of Healthcare Provider with the employee's rights under FMLA and whether the leave is approved or disapproved.
 - WILS uses a "rolling method" to calculate an employee's available leave time. The rolling method, also known as the look-back method, will add up any FMLA time the employee has used during the previous 12 months and subtract the total from the employee's 12-week leave allotment. Therefore, when calculating an employee's available FMLA leave, the employee's remaining available balance is 12 weeks minus whatever portion of FMLA leave the employee used during the 12 months preceding that day.
- f. An employee on FML is entitled to the following employee benefits:
- FMLA leave is considered unpaid leave. WILS requires the employee to use any accrued sick, personal, or vacation leave concurrently while on FML, if available, before taking leave as unpaid.
 - While on unpaid medical leave, the employee does not accrue additional vacation or sick leave and will not be paid for holidays that occur during the FML period. The accrual of vacation and sick leave benefits will be restored immediately upon the employee's return to active employment.

- During FML an employee covered by the WILS Group Health Plan, Dental Plan, Vision Plan, Short-term Disability, Life and AD&D policies shall continue to have coverage. WILS shall continue regular payroll withholding for all employee contributions during any period of FML when paid vacation or sick leave is running concurrently. When FML is unpaid, WILS will make payment of the employee's portion of these insurance premiums. The employee shall have the responsibility for all voluntary deductions withheld from his/her or her paycheck currently applied at the time FML goes into effect, once leave becomes unpaid. These payments will be due the 1st of each month.
- When the employee returns from FMLA leave, he or she will be restored to the current job position or to an equivalent job position unless the current position has been affected by a reduction in force, reorganization, or other change that would have occurred had he or she not been on leave.
- g. WILS will ask for periodic reports during FML, and a medical release before the employee returns to work.
 - WILS requests that the employee on FML call the Human Resources department on the first and third Friday of each month that he or she is on leave to give an update of conditions and intent. WILS may request additional updates during an employee's absence.
 - Medical certification that an employee who has been absent due to personal illness or injury and is able to return to work shall be required before he or she can return to active status.
 - If the employee exhausts all available FML and continues to require additional leave, the employee can request in writing to the Executive Director for emergency leave of absence without pay, per WILS Personnel Policies and Procedures.

5. Short Term Disability Benefits: Effective July 1, 2019, WILS provides employer paid short term disability (STD) coverage for full-time employees. New hires will become eligible on the first day of the month after they are hired. Benefits are paid at a rate of 60% of your base salary beginning day 15 of a qualifying sickness or injury, for up to a maximum of 11 weeks. Employees may use accrued sick or vacation leave to replace lost income during the waiting period, and may use accrued sick or vacation leave to cover up to 40% of their regular base pay once STD payments begin, to replace a total of 100% of the employee's base salary while on STD.

6. Leave of absence without pay:

- a. Employees who are not eligible for FMLA leave, may make a one-time request for an extended leave of absence for up to 30 days, beyond normal vacation or sick leave. The request shall be submitted for consideration to the Executive Director. The statement should include purpose and proposed dates of leave. If

approved, employee benefits will be paid until the end of the calendar month in which the request is made.

- b. Approval of such leave will be granted only under extenuating circumstances and is at the discretion of the Executive Director, with approval of the Board. Approval of the request for leave will be based upon the extenuating circumstances, the effect of the leave on agency needs, and finances of the agency. The employee's overall job performance and/or any other pertinent information also may be considered.
- c. On return, every effort will be made to place the employee in the same position he/she left, or one of like status, or pay. If such is not available, the employee will be eligible for normal termination benefits.
- d. Documentation of leave will be placed in the employee's file.

7. Bereavement Leave:

- a. Employees may take bereavement leave with pay, not to exceed 3 workdays for a death in their immediate families. Immediate family members are considered to be a spouse, child, parent, significant other, sibling, spouse's parent, significant other's parent, grandparent, or grandchild (including step and in-law status.) In the case of the death of a spouse or a child, up to 5 days may be granted.
- b. With approval of their supervisors, employees may take bereavement leave with pay to attend the visitation or funeral of a deceased consumer when the service is held during normal working hours. Leave time will not be charged against employees.
- c. The Executive Director may approve exceptions to these guidelines.

8. Annual military leave: Any employee who is a member of the National Guard or any of the reserve components of the Armed Forces of the United States will be allowed paid leave for active duty military service or for annual training, up to a maximum of 120 hours per calendar year, and shall additionally have the option of drawing on any available accrued vacation pay while on military leave to cover any time not paid by WILS. Such leave must be requested in writing, and official military orders should be attached to confirm such leave, if/when available. During the first 120 hours of paid leave per year, WILS will pay the difference between the employee's military pay and what the employee would have earned while working for WILS during the same period of time.

9. Jury duty leave: Leave with full pay will be granted to those employees who must serve on jury duty or who are subpoenaed to testify in court. Employees must provide written verification of jury duty or witness subpoena, and of any jury or witness pay received.

10. Voting Leave:

- a. In compliance with Missouri Revised Statutes, Section 115.639, WILS allows employees three (3) consecutive hours of leave, as needed, during polling hours in order to vote in federal, state, or local elections, including both primary and general elections.
- b. Employees must request time off for voting in writing or via e-mail at least five (5) business days in advance. The request for leave must clearly state the employee needs leave in order to vote.
- c. Missouri voting polls open at 6 a.m. and close at 7 p.m. Employees may choose to report for work an hour late or leave an hour early in order to receive their (3) consecutive hours to vote. No deductions will be made from wages or salaries for this time.

11. Administrative Leave/Home Assignment- This policy identifies the procedures to be followed when a WILS employee is the subject of an investigation into suspected or alleged misconduct, and has been placed on Administrative Leave/Home Assignment, with or without pay, in conjunction with such investigation.

- a. An employee of WILS will be relieved temporarily of their normal job responsibilities when management determines it would be in the Agency's best interest to temporarily remove the employee from the workplace. The WILS employee is asked to remain at home during regular work hours but continues to receive regular pay and benefits, unless otherwise decided by Executive Director in consultation with Director of Administration.
- b. This type of leave will be used only in situations when an employee should not remain in the workplace. Common reasons for administrative leave include:
 - To secure particularly sensitive information or resources if warranted by the circumstances.
 - To investigate allegations of misconduct, which, if true, could place people or WILS' resources in jeopardy.
 - To remove a WILS employee from the workplace who is behaving disruptively (pending an assessment of the situation).
 - Depending on the results of an assessment of the situation by the Executive Director, a type of leave may be granted, either with or without pay, at the discretion of the Executive Director.
- c. The WILS employee will be required to cooperate fully. They should remain home during work hours when they are being paid for home assignment, so that they can be available to come in and answer questions. The employee must also be ready to return to work on short notice if the issues under investigation are resolved.
- d. Pending the completion of the investigation, steps must be taken to secure or prevent the destruction of documents or other information relevant to the investigation. It is the responsibility of the immediate supervisor or manager, with the assistance of Director of Administration and WILS IT, to terminate or suspend, as applicable, the WILS employee access privileges to WILS' information systems and to appropriately limit access to WILS' facilities.

- e. Investigations shall be conducted in an expedited manner as circumstances allow.
- f. At the conclusion of the investigation, if a WILS employee was on an administrative leave without pay and it is determined the employee was not at fault, any wages that would have been earned while on administrative leave without pay will be restored.
- g. Requesting administrative leave: Supervisors who believe there may be a need for administrative leave should speak with their Director of Administration. The Director of Administration can help evaluate the situation, determine the best course of action, and obtain the necessary approval, as needed.
- h. The Executive Director must approve the leave prior to sending the employee home.
- i. This policy applies to all WILS' employees.
- j. The implementation of this policy is the responsibility of the Executive Director and Director of Administration, in consultation with the WILS Board President or designated Board Member(s), as applicable.

12. Victims of Domestic or Sexual Violence Leave Policy - Employees who are victims of domestic or sexual violence, or have a family or household member who is a victim of domestic or sexual violence, may take UNPAID leave from work to address such violence by:

- Seeking medical attention for, or recovering from, physical or psychological injuries caused by such violence.
- Obtaining services from a victim services organization.
- Obtaining psychological or other counseling.
- Participation in safety planning, temporarily or permanently relocating, or taking other actions to increase safety of the employee or employee's family or household.
- Seeking legal assistance or remedies to ensure health and safety.
- a. An individual who works for a business employing 20-49 employees is entitled to up to one workweek of unpaid leave within any 12-month period to address such matters.
- b. Employer may request certification that the employee or member of family or household is a victim as described above.
- c. Must restore employee to the position of employment held prior to the reporting of domestic or sexual violence or an equivalent position.
- d. Must maintain coverage for the employee and any family or household member under any group health plan for the duration of such leave at the level and under the conditions coverage would have been provided had the employee continued in the employment previously held.
- e. May, under many circumstances, recover from the employee the premium paid for maintaining coverage if the employee fails to return from leave after the leave period has expired.

G. Holidays—

1. WILS observes the following holidays annually:
 - a. New Year's Day
 - b. Martin Luther King Day
 - c. Memorial Day
 - d. Juneteenth
 - e. Independence Day
 - f. Labor Day
 - g. Veterans Day
 - h. Thanksgiving Day and the following Friday
 - i. Christmas Day
 - j. Employee's Birthday (see #7)
 - k. Floating Holiday
2. Exceptions to these holiday policies must be approved by the Board.
3. Probationary employees hired for full-time positions are eligible for holiday pay at the onset of employment. These employees will receive holiday pay consistent with their regular daily wage. Part-time and temporary employees are not eligible for holiday pay.
4. An employee must be in pay status both the work day before and the work day after the holiday in order to be eligible to receive that day with pay.
5. If a holiday occurs on a Saturday, it will be observed on the preceding Friday. If a holiday falls on a Sunday, it will be observed on the following Monday.
6. Holidays falling during a period of approved vacation time will not be considered chargeable vacation days.
7. The employee's birthday will be considered as a Holiday to be taken off during the month of their birth on a date approved by their supervisor. Unused birthday leave cannot be carried over and will not be paid at the time of separation.
8. An employee may request a floating holiday to be taken off on any workday during the current calendar year, but the day must be pre-approved by the supervisor.
9. Unused floating holiday leave cannot be carried over into the next calendar year and will not be paid at the time of separation.

H. Employee Uniforms - Employees will be issued one uniform shirt to be worn while attending WILS' events. Additional shirts may be purchased at the employee's expense.

WILS wants to ensure that its employees who are Ramp Builders or Transportation Drivers are clearly identified as representing the agency. To achieve this goal, WILS has instituted a uniform policy for these employees.

Employees engaged in tasks as Ramp Builders or as Transportation Drivers are required to wear Agency-designated uniform shirts at all times. Agency uniform procedures are the following:

1. WILS will issue five uniform shirts to each employee engaged as ramp builders or as transportation drivers.
2. Upon issue, Agency uniforms become the responsibility of the employee for maintenance and care.
3. WILS may issue new uniforms on an annual basis, or as deemed necessary by the Executive Director.
4. In the event of termination of employment, employees are required to return all issued uniforms as part of the exit process. If all issued uniforms are not returned, WILS will deduct the cost of the uniforms not returned from the final paycheck due the employee (except where such deductions are prohibited by state law).

If employees have questions regarding this policy, they should contact their supervisor or the Director of Administration.

VIII. PERSONAL CONDUCT

A. Attendance and Punctuality–

1. Attendance and punctuality are requirements for all job positions.
2. All employees are expected to be punctual in regard to appointments, not only with consumers, but also with any other persons contacted in the course of employment.
3. If an appointment cannot be met, or lateness occurs, the employee shall contact the person and make the necessary arrangements.
4. Employees are required to inform their supervisor, in advance, unless there are extenuating circumstances, of work activities outside the office.

B. Materials and Supplies–

1. All equipment, office furniture, and supplies necessary for the performance of the employee are to be provided by WILS. The personal use of any WILS equipment and/or supplies is prohibited.
2. Letterhead stationary is to be used for all official business.
3. Equipment or materials belonging to WILS should not be taken from the office by employees without the knowledge and consent of their supervisor, but not for personal use in any case.
4. Using WILS phones for personal calls is prohibited.

C. Conflict of Interest–

1. As an employee of WILS, the primary obligation is to serve the interests and intentions of WILS and the policies of the WILS Board. Therefore, an employee must not accept employment or perform services for a private or public interest when doing so would be incompatible with or in conflict with the performance of official duties.
2. Confidential information received as a WILS employee may not be used for personal gain or for the benefit of any private interest.

D. Confidentiality–

1. It is the responsibility of each employee to protect coworkers and consumers against the disclosure or misuse of personal records and/or confidential information pertaining to them.
2. Employees may not discuss personal or confidential information about consumers except with authorized personnel as part of a professional plan of action. Personnel file information about coworkers also must remain confidential except as part of assigned job responsibilities. Divulging information from consumer records or personnel files to unauthorized persons or for unauthorized purposes is cause for disciplinary action or termination of employment.
3. If WILS personnel, or volunteers, become aware that an individual has AIDS or is HIV positive, that information will be kept strictly confidential. State law prohibits making any further disclosure of AIDS or HIV information without the specific, written consent of the person to whom it pertains, or as otherwise permitted by law. A general authorization is not sufficient authorization for further disclosure. Any unauthorized disclosure is violation of state law, and may result in a fine or jail sentence, or both, and disciplinary action including suspension or termination of employment, and/or discontinuance of any volunteer relationship.
4. WILS complies with HIPPA requirements.

E. Smoke-free Environment– WILS desires to provide a healthy and safe environment for all employees and consumers, and has designated the WILS offices as a tobacco and vaping free environment. Use of any form of tobacco or vaping, including e-cigarettes, within 25 feet of any entrance is prohibited.

F. Drug-free Workplace–

1. To ensure the safety and health of our employees and consumers, to protect WILS' property and resources, and to comply with the provisions of the Federal Drug-free Work Place Act of 1988:
 - a. The unlawful manufacture, distribution, dispensation, possession or use of controlled substances, including medical marijuana, while on the premises of WILS or while conducting WILS business off the premises by a WILS employee is prohibited.
 - b. Reporting for work and/or conducting official business while under the influence of an intoxicant or impaired by the consumption or use of a controlled substance, including medical marijuana, is prohibited. Behavior indicating possible violation may result in immediate drug testing.
 - c. If an employee tests positive for illegal drugs (any positive test) or alcohol, then the employee may be terminated immediately or required to seek outside counseling and/or treatment, at the employee's expense when not covered by WILS' group health insurance, as a condition of continued employment. WILS will handle these situations on a case-by-case basis.
 - d. Any employee who is found to have violated this policy will be subject to discipline up to and including dismissal.
 - e. As part of WILS' ongoing Drug-free Awareness Program, annual education will be conducted by substance abuse professionals, local law enforcement officials and/or Agency staff regarding the dangers of drug abuse. All employees will also review WILS' policy at this time.
 - f. Off-the-job use of medical marijuana, with an appropriate prescription, shall not result in discipline so long as the employee does not possess marijuana while on duty or on WILS property, and is not under the influence while at work.

G. Political Activity– Employees are encouraged to participate in our democratic process. However, employees, while performing their job duties for WILS, shall not participate or intervene in any political campaign on behalf of any political party, candidate for public office, or any ballot issue, unless the Board has voted to support a particular issue because of its potential impact on the mission and functioning of WILS.

H. Professionalism–

1. As a representative of WILS, each employee is expected to maintain a demeanor that reflects professionalism, friendliness, and genuine concern for WILS consumers, fellow employees, and the general public. Display of actions or attitudes inconsistent

with such conduct, including uncooperative behavior, may result in disciplinary action or termination of employment.

2. No employee, volunteer, or other representative of WILS will administer physical or verbal abuse to any consumer, employee, or volunteer for any reason, nor will he or she manipulate the behavior of any consumer, employee, or volunteer by psychologically abusive techniques. Such behaviors may result in disciplinary action or immediate dismissal of the employee, volunteer, or representative. Allegations of abuse or neglect of consumers by any employee, volunteer, or other representative will be reported immediately to the appropriate authorities.
3. Offensive or disruptive behavior, even when in conjunction with a disability, is not permitted by the ADA and will be handled as inappropriate behavior.
4. During work hours, staff will dress in a manner appropriate for the task to be accomplished. Clothing should not be offensive or disruptive. Please see the Staff Procedures for more details on the dress code.

I. Work Performance–

1. Employees will perform their duties with timeliness, quality, and effort appropriate to the task.
2. Employees will read and work within federal and state regulations; WILS board policy, administrative directives, and organizational procedures.
3. Employees will maintain required records and submit requested reports in an accurate and timely manner.
4. Employees will comply with all safety guidelines.

J. Nondiscriminatory Conduct– WILS employees are to respect the rights and dignity of co-workers, consumers, and others with whom they interact on behalf of the agency. Conduct which is discriminatory on the basis of race, color, veteran status, religion, age, sex, gender identity, disability, or membership in any other protected category will not be tolerated. Such prohibited conduct includes any form of harassment or bullying, including sexual harassment. Retaliation against employees who report discrimination or harassment will not be tolerated.

K. Falsification of Records or Misrepresentation of Facts

1. Falsification of records or official documents, and/or misrepresentation of facts relevant to WILS' operations is prohibited by WILS. This includes altering WILS personnel, consumer, attendant, or business records; forging signatures or initials of authorization; falsifying information on any other documents; and/or misrepresenting

or concealing information relevant to the Agency's operations. The forgery of the initials or signature of any employee or consumer is also expressly prohibited.

2. Any WILS staff member who believes this policy has been violated shall promptly report the issue to his or her supervisor and/or HR.
3. Any employee found to have falsified records is subject to disciplinary action up to and including termination.

L. Board/Staff Communication– To assist in facilitating effective communication and to ensure a successful organization, the following guidelines for board/staff communication have been established:

1. Board members and staff members are encouraged to share ideas and communicate on a regular basis. Members of the WILS Board have expertise in many areas and are willing to assist staff in their programs or departments. Therefore, staff members may contact Board members if they need consultation or help. Staff are encouraged to inform the Executive Director and/or the Board president of the contact, prior to the meeting if possible.
2. Staff members who have concerns or problems that relate to policies or the overall operation of WILS should make their supervisor and/or Executive Director aware of those concerns. If staff members are uneasy discussing concerns with either of these individuals, they are encouraged to contact the president of the Board.
3. Board members who are contacted directly by staff members regarding concerns or problems that relate to policies or the overall operation of WILS should listen to those staff members, and then encourage them to contact the appropriate supervisor, the Executive Director, or the Board president. The Board member also should relay the staff member's concerns, either anonymously or by the staff member's name, to the Executive Director and/or Board President. Board members should not take personal action regarding staff concerns, as the Board member may not be aware of or have access to all of the pertinent information.
4. Staff liaisons to Board committees always should consult with the committee chair prior to preparing any agendas. In the event the staff liaison is placing a proposal or requesting that a new policy item be on the agenda, the proposal or policy must be reviewed at least 5 days prior to presentation by the Executive Director. This will ensure that the proposal or policy fits into the overall objectives and goals of WILS.
5. The Executive Director is to be kept informed of communication between staff members and the Board.

M. WILS Whistleblower Policy –

1. Definitions:

- a. **Whistleblower:** an employee who informs a supervisor, the Executive Director, or a member of the Board about an activity which that person believes to be fraudulent, dishonest, or contrary to any applicable law or regulation.
- b. **Fraudulent or Dishonest Conduct:** a deliberate act or failure to act with the intention of obtaining an unauthorized benefit. Examples of such conduct include but are not limited to:
 - forgery or alteration of documents
 - unauthorized alteration or manipulation of computer files
 - fraudulent financial reporting
 - pursuit of a benefit or advantage in violation of the WILS' conflict of interest policy
 - misappropriation or misuse of WILS resources such as funds, supplies, or other assets
 - authorizing or receiving compensation for goods not received or services not performed.
- c. **Bad Faith Allegations:** allegations made with reckless disregard for their truth or falsity, or without a reasonable, good faith basis. People making bad faith allegations are subject to disciplinary action.

2. Rights and Responsibilities:

- a. WILS will investigate any reported fraudulent, dishonest, or unlawful use or misuse of WILS resources or property by management, staff, volunteers, or members. Anyone found to have engaged in fraudulent, dishonest, or unlawful conduct is subject to disciplinary action by WILS up to and including discharge.
- b. All members of WILS are encouraged to report possible fraudulent, dishonest, or unlawful conduct (i.e., become a whistleblower). An employee should report his/her concerns to a supervisor or the Executive Director. If for any reason an employee finds it difficult to report a concern to a supervisor, the employee can report it directly to any member of the Board.
- c. Supervisors are required to report suspected fraudulent, dishonest, or unlawful conduct to the Executive Director or a member of the Board. In addition, supervisors are responsible for maintaining a system of management controls to detect and deter fraudulent, dishonest, or unlawful conduct. Failure by a supervisor to establish management controls or report misconduct within the scope of this policy may result in adverse personnel action against the supervisor, up to and including dismissal. The Executive Director is available to assist supervisors in establishing management systems and recognizing improper conduct.
- d. Reasonable care should be taken in dealing with suspected misconduct to avoid:
 - bad faith allegations
 - premature notice to persons suspected of misconduct and/or disclosure of suspected misconduct to others not involved with the investigation
 - any violation of a person's rights under law.

- e. A supervisor who has received a report of suspected misconduct:
 - should immediately report the matter to the Executive Director and Director of Administration
 - should not contact the person suspected to further investigate the matter or demand restitution
 - should not discuss the case with anyone other than the Executive Director or a member of the Board.
 - should direct all inquiries from the media to the Executive Director.

3. Whistleblower Protection:

- a. WILS will use best efforts to protect whistleblowers against retaliation. Upon request, WILS will keep the whistleblower's identity confidential to the extent reasonable possible. It may be necessary to disclose a reporting individual's identity if:
 - identification is necessary to allow WILS or law enforcement officials to investigate or respond effectively to the report (There is no such thing as an "unofficial" or "off the record" report), or
 - identification is required by law.
- b. WILS employees may not retaliate against a whistleblower with the intent or effect of adversely affecting the terms or conditions of employment (including but not limited to, threats of physical harm, loss of job, punitive work assignments, or impact on salary or wages). Whistleblowers who believe that they have been retaliated against may file a written complaint with the Executive Director, or a member of the Board. A proven complaint of retaliation shall result in a proper remedy for the person harmed and the initiation of disciplinary action, up to and including dismissal, against the retaliating person. This protection from retaliation is not intended to prohibit supervisors from taking action including disciplinary action, in the usual scope of their duties and based on valid performance-related factors.
- c. Whistleblowers must take reasonable care to avoid bad faith allegations.

N. Weapon-Free Workplace Policy

1. Introduction:

- a. To ensure that WILS maintains a workplace safe and free of violence for all employees the Agency prohibits the possession or use of dangerous weapons on Agency property.
- b. All WILS employees are subject to this provision, including contract workers and temporary employees as well as visitors and customers on Agency property. A license to carry the weapon on Agency property does not supersede Agency policy. Any employee in violation of this policy will be subject to disciplinary action, up to and including termination.

2. Definitions

- a. “Agency property” is defined as all Agency-owned or leased buildings and surrounding areas such as sidewalks, walkways, driveways and parking lots under the Agency’s ownership or control. This policy applies to all Agency-owned or leased vehicles and all vehicles that come onto Agency property, except that employees, consumers, and visitors have the right to possess a firearm in a personal vehicle, so long as the firearm is not visible to persons outside the vehicle, and is not brandished or removed from the vehicle at any time while on WILS property.
- b. “Dangerous weapons” include firearms, explosives, knives and other weapons that might be considered dangerous or that could cause harm. Employees are responsible for making sure that any item possessed by the employee is not prohibited by this policy.

3. Searches of Personal Property

- a. WILS reserves the right at any time and at its discretion to search all Agency-owned or leased vehicles and all packages, containers, briefcases, purses, desks, enclosures and persons entering its property, for the purpose of determining whether any weapon is being, or has been, brought onto its property or premises in violation of this policy. Employees who fail or refuse to promptly permit a search under this policy will be subject to discipline up to and including termination.

O. Acceptable Use Policy (AUP) for WILS Informational Technology (IT) Systems

1. Introduction:

- a. This AUP for IT Systems is designed to protect WILS, our employees, consumers, and other partners from harm caused by the misuse of our IT systems and our data. Misuse includes both deliberate and inadvertent actions.
- b. The repercussions of misuse of our systems can be severe. Potential damage includes, but is not limited to, malware infection (e.g. computer viruses), legal and financial penalties for data leakage, and lost productivity resulting from network downtime
- c. Everyone who works at WILS is responsible for the security of our IT systems and the data on them. As such, all employees must ensure they adhere to the guidelines in this policy at all times. Should employees be unclear on the policy or how it impacts their role they should speak to their supervisor or the Director of IT.

2. Definitions:

- a. **Users:** Everyone who has access to any WILS IT System. This includes permanent employees, temporary employees, contractors, agencies, consultants, suppliers, customers, and business partners.

- b. **IT Systems:** All IT equipment that connects to the WILS network or accesses WILS applications. This includes, but is not limited to, desktop computers, laptops, smartphones, tablets, printers, data and voice networks, networked devices, software, electronically-stored data, portable data storage devices, third party networking services, telephone handsets, video conferencing systems, and all other similar items commonly understood to be covered by this term.

3. Scope:

- a. This is a universal policy that applies to all Users and all IT Systems. For some Users and/or some IT Systems, more specific policies may exist. In such cases, the more specific policy has precedence in areas where they conflict, but otherwise both policies apply on all other points.
- b. This policy covers only internal use of our IT Systems and does not cover use of our services by consumers or other third parties.
- c. Staff members who monitor and enforce compliance with this policy are responsible for ensuring that they remain compliant with relevant local legislation at all times.

4. Use of IT Systems:

- a. All data stored on IT Systems is the property of WILS. Users should be aware that WILS cannot guarantee the confidentiality of personal information stored on any IT System except where required to do so by law.
- b. IT Systems exist to support and enable the organization. A small amount of personal use is, in most cases, allowed. However, it must not be in any way detrimental to users own or their colleague's productivity, nor should it result in any direct costs being borne by WILS other than for trivial amounts (e.g., an occasional short telephone call).
- c. WILS trusts employees to be fair and sensible when judging what constitutes an acceptable level of personal use of IT Systems. If employees are uncertain, they should consult their supervisor.
- d. Any information that is particularly sensitive or vulnerable must be encrypted and/or securely stored so that unauthorized access is prevented (or at least made extremely difficult). However, this must be done in a way that does not prevent, or risk preventing, legitimate access by all properly-authorized parties.
- e. WILS can monitor the use of its IT Systems and the data on it at any time. This may include (except where precluded by law) examination of the content stored within the email and data files of any User and examination of the access history of any User.
- f. WILS reserves the right to regularly audit networks and systems to ensure compliance with this policy.

5. Data Security

- a. Users must take all necessary steps to prevent unauthorized access to electronically stored information.
- b. Users must not send, upload, remove to portable media, or otherwise transfer to a non-WILS IT system any information that is designated as confidential or that they should reasonably regard as being confidential to WILS, except where explicitly authorized to do so in the performance of their regular duties.
- c. Users must keep passwords secure and not allow others to access their accounts. Users must ensure all passwords comply with the IT Systems safe password policy.
- d. Users who are supplied with computer equipment by WILS are responsible for the safety and care of that equipment and the security of software and data stored on that equipment, as well as data on other IT systems that they can access remotely using it.
- e. Because information on portable devices, such as laptops, tablets and smartphones, is especially vulnerable, special care should be exercised with these devices. Sensitive information should be stored in encrypted folders only. Users will be held responsible for the consequences of theft of or disclosure of information on portable systems entrusted to their care if they have not taken reasonable precautions to secure that information.
- f. All workstations (desktops and laptops) should be secured with a “lock-on-idle” setting active after, at most, 5 minutes of inactivity. In addition, the screen and keyboard should be manually locked by the responsible User whenever leaving the machine unattended.
- g. Users who have been charged with the management of those systems are responsible for ensuring that they are at all times properly protected against known threats and vulnerabilities, as far as is reasonably practicable and compatible with the designated purpose of those systems.
- h. Users must at all times guard against the risk of malware (e.g., viruses, spyware, Trojan horses, rootkits, worms, backdoors) being imported into WILS IT Systems by whatever means, and must report any actual or suspected malware infection immediately.

6. Unacceptable Use:

- a. All employees should use sound judgment regarding what is unacceptable use of WILS IT Systems. Should an employee question the appropriateness of any activity, they should consult with and obtain approval from their supervisor before proceeding.

- b. The activities below are provided as examples of unacceptable use. This list is not exhaustive—
- All illegal activities. These include theft, computer hacking, malware distribution, contravening copyrights and patents, and using illegal or unlicensed software or services. These also include activities that contravene data protection regulations.
 - All activities detrimental to the success of WILS. These include sharing sensitive information outside the Agency, such as research and development information and consumer lists, as well as defamation of the Agency.
 - All activities for personal benefit only that may have a negative impact on the day-to-day functioning of the business. These include activities that slow down the computer network (e.g., streaming video, playing networked video games).
 - All activities that are inappropriate for WILS to be associated with and/or are detrimental to the Agency's reputation. This includes pornography, gambling, inciting hate, bullying or harassment.
 - Circumventing the IT security systems and protocols that WILS has put in place.

7. Enforcement:

- a. WILS will not tolerate any misuse of its IT Systems, and will discipline anyone found to have contravened the policy, including not exercising reasonable judgment regarding acceptable use. While each situation will be judged on a case-by-case basis, employees should be aware that consequences may include the termination of their employment.
- b. Use of any of WILS resources for any illegal activity is grounds for summary dismissal, and WILS will not hesitate to cooperate with any criminal investigation and prosecution that may result from such activity.

IX. GRIEVANCES

A. Right to File a Grievance— Any WILS employee may file a formal grievance when the employee perceives any on-the-job action, occurrence, or attitude (either expressed or implied) as unfair or inequitable.

B. Grievance Procedure—

1. First, the employee should discuss the particular grievance informally with his/her immediate supervisor.
2. If an agreement or resolution is not achieved through discussions with the immediate supervisor, and if the immediate supervisor is not the Executive Director, an informal meeting may then be requested with the Executive Director.

3. If resolution is not achieved through the informal meeting with the Executive Director, or if the immediate supervisor is the Executive Director, the employee may then submit a formal written grievance to the Executive Director. The formal written grievance must be submitted within five working days after any informal meeting with the Executive Director. The written grievance must: (1) specify the specific condition the employee is objecting to; (2) identify any policy, rule, or procedure the employee believes has been violated; and (3) specify the remedy desired.
4. The Executive Director must provide a written response within ten working days after receipt of the formal grievance. If the matter is not resolved at this point, the employee may submit the formal grievance to the President of the Board. This must be done within 15 working days after receiving the written response from the Executive Director.
5. The Board may request such other information as shall be considered necessary to assist in a decision. The Board, the Executive Director, or the employee raising the grievance may request a meeting to discuss the issue(s).
6. The decision of the Board, along with the reason(s) for the decision, will be stated in writing to the employee and to the Executive Director. The Board's decision is final.

X. DISCIPLINARY ACTION

NOTE: Employees are reminded that WILS is an “at-will employer.” That is, either the employee or WILS may terminate the employment relationship at any time, and for any lawful reason, with or without cause.

A. Reasons for Disciplinary Action–

1. Disciplinary action may occur when an employee is found to have acted in a manner detrimental to the purpose, functioning, or image of WILS.
2. Potential reasons for disciplinary action include, but are not limited to, the following:
 - a. Failure to meet performance standards,
 - b. Failure to complete tasks in a timely and competent manner,
 - c. Failure to maintain an adequate attendance record,
 - d. Display of an uncooperative attitude,
 - e. Unprofessional conduct,
 - f. Insubordination,
 - g. Failure to return from leave,
 - h. Failure to report regularly and promptly for work,
 - i. Using sick leave in a manner deemed to be excessive or inappropriate,

- j. Any form of harassment or bullying, including sexual harassment,
- k. The possession or use of dangerous weapons on Agency property, or
- l. Illegal drug use or impairment on the job.

B. Progressive Discipline– The Agency recognizes the concept of progressive discipline. Normally, an employee will not be discharged or suspended for an offense without having received prior discipline. However, where all the facts and circumstances warrant bypassing the traditional steps of progressive discipline, employees may properly be subject to suspension or termination on the first offence. The usual steps of progressive discipline shall be as follows:

- 1. Documented Counseling
- 2. Written Warning.
- 3. Final Written Warning (with or without suspension)
- 4. Discharge

All disciplinary documentation short of discharge shall: (1) specify the actions or inaction that resulted in discipline; (2) describe the desired future performance or behavior; and (3) state the consequences of continued failure to meet the Agency's performance or behavior expectations.

Upon issuing discipline, management shall place the original disciplinary memorandum in the Agency's personnel file on the employee, and shall provide a copy of the memorandum to the employee.

C. Dismissal for Cause–

- 1. Full-Time, part-time, and temporary employees who are dismissed for cause will be given their final pay check at the time of dismissal.

XI. SEPARATION FROM EMPLOYMENT

A. At-will Employment– Employment at WILS is “at-will.” That is, either the employee or WILS may terminate the employment relationship at any time, for any lawful reason, with or without cause.

B. Types of Separation from Employment– The end of an employment relationship with WILS commonly falls within one of the categories below, with stated policies applicable to each:

- 1. **Resignation:** WILS requests that employees voluntarily terminating employment with WILS give written notice to the Executive Director two weeks prior to their desired final day of work. If proper notice is given, the employee will be eligible to

receive pay for any unused paid vacation, or will be permitted to use such leave during the notice period, at the Agency's discretion.

2. **Completion of Temporary Employment Agreement:** A temporary employee will be automatically terminated at the end of the agreed term of employment or upon completion of the project for which the employee was hired. No additional benefits will be received.
3. **Reduction in Force:** An employee's job may be eliminated due to reorganization or financial considerations of WILS, as determined by the Board. When possible, an affected employee will be given one month's notice. Reasonable time off during the notice period for interviews, is negotiable between the Executive Director and the employee.
4. **Mutual Agreement:** In a situation where the employee and the Executive Director, and/or Board of Directors, agree that it would be mutually beneficial to end employment, a departure date will be informally agreed upon. Unused vacation will be granted in time-off prior to termination, or unused vacation will be paid at the time of termination.
5. **Unsatisfactory Performance/Misconduct:**

As in the case of disciplinary action, reasons for termination due to unsatisfactory performance include, but are not limited to the following:

- a. Failure to meet performance standards,
- b. Failure to complete tasks in a timely and competent manner,
- c. Failure to maintain an adequate attendance record,
- d. Display of an uncooperative attitude,
- e. Unprofessional conduct,
- f. Insubordination,
- g. Failure to return from leave, or to report regularly and promptly for work,
- h. Using sick leave in a manner deemed to be excessive or inappropriate,
- i. Any form of harassment or bullying, including sexual harassment,
- j. The possession or use of dangerous weapons on Agency property, in violation of Agency policy.
- k. Illegal drug use or impairment on the job.

Unused vacation shall have no cash value when employees are discharged for unsatisfactory performance or misconduct.

- C. **Exit Interview**– The Executive Director or Director of Administration will conduct an exit interview with the employee when appropriate, documenting in the employee's file any information pertinent to his/her separation.

I acknowledge that I have received, and read in full, this *Personnel Policies and Procedures* manual.

Date: _____

Signature: _____

Printed Name: _____