STAND UP inc.

Procedure Manual

Table of Contents:

1. Human Resources
1.1. Recruitment
1.2. Credential Checks
1.3. Employee Availability
1.4. Promotions
1.5. Backup Personnel Plan
1.6. New Employee Training
1.7. Continued Education
1.8. Employee Evaluation
1.9. Corrective Action
1.10. Exit Interviews
1.11. Caseloads
1.12. Background checks
1.13. Job Descriptions
1.14. Communication Policy
1.15 Flex time Policy
1.16 Organizational Chart
1.17 Leadership Overview
1.18 Confidentiality of Employee Information and Administrative records
1.19 Continuing Education Policy
1.20. Public Relations/Media Contacts
1.21. Stand Up, Inc 401K Plan 839045

2. Business Practices
2.1. File Maintenance
2.2. Money Handling
2.3. Corporate Compliance
2.3.A. LEIE Review

2.4. Outcome Measurements
2.5. Surveys of Stakeholders
2.6. Accommodation Requests
2.7. Technology Plan
2.8. Entering bills
2.9. Paying bills
2.10. Time sheets
2.11. Reports and billing
2.12. Posting invoices
2.13. Vehicle Safety
2.14. Payroll
2.15. Conflict of Interest and Corporate Responsibility
2.16. Mission Statement
2.17. Code of Ethics
a. Code
b. Violations of ethical code
2.18. Contractual Relationships
2.19. Waste, Fraud, Abuse and other wrongdoing
2.20. Debt
2.21. Risk Management
2.22. Private pay customers
2.23. Medicaid Billing
2.24. Rate determination
2.25. LTESS Reports
2.26. Reimbursements
2.27 Medicaid Funding
2.28 Remaining in compliance with laws and regulations as an ESO
2.29 Vendor approvals
2.30 Corporation status
2.31 Employment Practices
2.32 Requests for information from ESO

3. Customer Services
3.1. Program Acceptance and referral process
3.2. Potential Customers
3.3. New Customers
3.4. Intakes

3.5. Confidentiality
3.6. Grievances
3.7. Matching customers to job coaches
3.8 Website
3.9. Behavior Management
3.10. LTESS; Long term follow along services
3.11. Social Networks
3.12. Work Adjustment Training
3.13. ISAR's
3.14. Customer Contact
3.15. Cultural Competency
3.16. Record Keeping
3.17. Crisis Intervention

4. Health and Safety
4.1. Emergency Procedures
A. Fire
B. Bomb Threats
C. Natural Disasters
D. Utility Failure
E. Medical Emergencies and Incidents Involving Injuries
F. Violent or Threatening Situations
G. Abuse of a Stand Up employee
H. In case of hostage/violent situation at the office
4.2. Evacuations
4.3. Critical Incidents
A. Prevention
B. Reporting
C. Remedial Action and Debriefing
D. Medication errors
E. Communicable disease
F. Infection control
G. Violence or aggression
H. Sentinel events
I. Use or possession of weapons
J. Wandering
K. Vehicular accidents

L. Hazardous materials and accidents
M. Use or possession of licit or illicit substances
N. Abuse or neglect
O. Suicide or attempted suicide
P. Sexual Assault
Q. The safety of our customers
R. Seclusion and/or restraints

4.4. Initial and competency based training
4.5. Emergency contact information
4.6 Sexual Harrassment

*This manual will be officially reviewed annually during the month of January, and any needed changes will be made at that time. Changes will be discussed with any affected parties through email or in person meetings and training will occur if needed. Unofficial reviews will occur periodically and updated as needed.

1. Human Resources

Stand Up employees full time and part time employees. Stand Up does not utilize any volunteers, contract employees, independent contractors, or any other category of employee.

1.1. Recruitment Policy

1. When a position becomes available the hiring supervisor utilizes an existing job description or works in correlation with HR in developing a new job description if needed.

2. Hiring supervisor notes any special requirements such as availability, etc. to HR department.
3. Department Heads will post the position opening in the home office or via email to all Stand Up employees; submit to the Virginia Employment Commission and other employment listings as needed, DARS and to all Stand Up employees.
4. All resumes and applications will be sent to the hiring supervisor in order for interviews to be scheduled.
5. Hiring supervisor will conduct a first interview for all prospective employees utilizing the interview questionnaire.
6. A pre-employment test will be provided to all applicants applying for a job coaching position which shall be completed prior to interviews.
7. A minimum of three reference checks will be performed by the hiring manager. (Also see Credential Check Procedure for additional information and requirements)
8. A second interview will occur for all perspective hires. Either the President or ED must be present in this interview.
9. In efforts to continually find appropriate candidates for employment, leadership connects with local university human service and special education departments, participates in local chamber opportunities and regularly attends employment fairs.

Updated 2/2017

1.2. Credential Check Procedure

1. Specific credentials for each position at Stand Up vary and are outlined in the position's job description.
2. Prior to hire of each employee, Stand Up performs a minimum of three reference checks on each employee in order to verify their employment record. This form is completed following the first interview by the hiring manager and is maintained in their employee file.
3. Transcript requests are completed for any employee with a college degree. This is maintained in their employee file.

4. If other credentials are required that may expire, this is noted in their employee files which are reviewed annually during the month of September to ensure that credentials remain current. If credentials are not up to date, direct services with customers may be stopped until the required credentials are in place.
5. If immunizations or other checks are required for a specific service, this is noted in the job description.
6. Driving policies are noted in section 2.13

Updated 12/2017

1.3 Employee Availability Procedure

Availability is required before a job offer will be made.

1. Once submitted, your availability should not change for the first 90 days of employment.
2. All employees must complete an availability form upon hire and whenever availability changes.
3. Availability forms must be submitted at least two weeks prior to their effective date.
4. If your availability changes after you are hired it is your responsibility to provide us those changes in writing.
5. If your availability does changes this may also affect the number of hours you receive. It is not the company's policy to guarantee your work week hours.
6. Availability forms include the maximum amount of hours you prefer to work.

Created 01/2017

1.4 Promotion Procedure

1. Any newly available positions will be emailed to all Stand Up employees and will be posted in Stand Up offices.
2. Any employee may apply for the new positions posted.

3. The employee's direct supervisor will write a brief reference and forward this to the hiring manager.
4. Hiring process will continue as stated in recruitment policy.

Created 8/2009

1.5 Back up Personnel Plan

Dan Reichard III (President)

- Contact Kelly Reichard (660-1823)

Kelly Reichard (Executive Director)

- Contact Dan Reichard (546-0682)

Director of Supported Employment

- Contact Kelly Reichard (660-1823)

Coordinator of Transition and Pre-ETS services

- Contact Kelly Reichard (660-1823)

Medicaid Program Manager

- Contact Kelly Reichard (660-1823)

For all other employees

- Contact your direct supervisor to fill any staffing requirements

Updated 7/2017

1.6 New Employee Training Procedure

1. Each new employee will meet with Human Resources and their direct supervisor on their first day of employment to review the employee handbook, procedure manual, their job description, and the Stand Up training manual. These include the mission and values of SUI, goals of service provision, overviews of program options, mitigating risk as well as

sharing strategic planning goals. Trainings include specific job duties, paperwork responsibilities, roles within the organization and expectations of the new hire.

2. Each employee will be enrolled in a Relias (a computer based training system) with courses designated for every new hire. Each new employee will have 90 days to complete these trainings.
3. Each employee will be given instructions for completion of required background checks and any other legal requirements needed for employment.
4. Each new job coach will be placed with a senior employee for on the job training. Topics overviewed in training with leadership will be reinforced 'on site' with the new employee to show the working practice of policies and service requirements. New staff will have 40 hours of training before taking responsibility for a case load.
5. Regular check ins are scheduled with new employees at 30, 60 and 90 day intervals to address training, areas in need of support or address questions for each new hire. Procedural trainings are also reinforced during these periodic reviews to reinforce concepts once new employees have a stronger working knowledge of SUI systems.
6. The Training Manual will be available for all staff throughout employment to aid in the specific needs and goals of each department.
7. Administrative staff will be trained as needed by their hiring supervisor.

Updated 5/2013

1.7 Continued Education Procedure

1. Continuing education is highly valued by Stand Up and therefore Stand Up commits to assist with the education of any employee.
2. Stand Up will hold trainings in staff meetings to address topics related to the mission of Stand Up.

3. Stand Up will have materials for furthering one's knowledge of their position available at the home office.
4. Any employee may request from their supervisor to attend classes, workshops, etc. in order to further their job knowledge and experience. Stand Up will address these requests on a case by case basis.

Created 8/2009

1.8 Employee Evaluation and Certification Procedure

Each employee is hired on a ninety-day probationary period. New direct support employees will receive performance reviews at 90 days, 6 months and annually in the month of hire thereafter. Benefits are available to new employees on the 91st day of employment. Evaluations are providing using the SUI Performance evaluation for each review provided. Self-evaluations are required annually. Reviews are stored in each employee's employee file.

1. 90 Days: At ninety days, the employee will receive their first review. If it is determined that the employee will be retained past their probationary period, they will then be eligible to participate in a Supported Employment course.
2. 6 months: The employee will receive a review and will be eligible for a raise based upon the employee's average score on their six-month review.
3. Annual Reviews: Annual reviews will occur in the month of hire. Raises are determined by the employee's average review score but are not guaranteed.
4. Each review will address the responsibilities outlined in the employee's job description, knowledge and competency regarding their job duties, including safety and training.
5. Each review will outline measurable goals for the following year

6. For employees that provide services in more than one department, department heads will collaborate on the review to provide feedback in each area of service. Feedback from customers, families, employers and funders will be considered in review scores.
7. The Executive Director will review all employee evaluations before the supervisor meets with the employee.
8. ACRE certification: If the employee completes the Supported Employment class and chooses to receive their ACRE certification, they are then eligible for a 0.50/ hour raise upon providing documentation of their ACRE certification.
9. CESP (Certified Employment Support Professional): If an employee who has completed their ACRE certification then chooses to take the CESP exam and passes the exam, they are then eligible for a $1.00/hour raise.

Updated 11/2017

1.9 Corrective Action Policy

1. An employee may receive a verbal warning from their immediate supervisor for failure to comply with any company rules, regulations or policies. Verbal warnings will be documented and filed in the employee's file.
2. An employee will receive a written corrective action statement from their immediate supervisor when the verbal warning has not resulted in the employee correcting the stated violation. The corrective action statement will be maintained in the employee's personnel file.
3. An employee will receive a second written corrective action statement from their immediate supervisor upon the third violation of the same offense. This will be maintained in the employee's file.
4. An employee may be placed on an unpaid disciplinary probation for a designated period of time for significant performance deficiencies which are determined by the employee's ability and intent to correct. The employee's immediate supervisor shall counsel the employee regarding

performance deficiencies, job performance standards, an improvement plan, and action to be taken if the employee fails to complete improvement goals. The employee's immediate supervisor shall document this probationary status and counseling using the designated form and shall give the employee a copy of the form and have another copy placed in their employee file. The employee will also be required to submit a plan for performance improvement to their immediate supervisor by the second day of probation.

5. If the employee returns to work following the probation period and has continues to not comply with company rules, regulations or policy the employee may be terminated.

Updated 05/2012

1.10 Exit Interview Procedure

1. When an employee quits or is terminated they will be mailed an exit interview with a postmarked addressed envelope to return to home office

2. Enclosed is a letter from HR requesting the completion of the exit interview.

3. Annually, the exit interviews are reviewed for any turnover trends and a report will be generated for this information. This report will reviewed each September.

Created 8/2009

1.11. Caseloads

In order to ensure customers receive the best services possible, the following caseload guidelines are to be followed. In the case that caseloads are larger than specified in this policy; Stand Up will hire new employees so that caseloads may remain within these guidelines. The number of customers/coach will be reviewed informally at the monthly leadership meetings. This policy excludes follow along customers.

1. Coaches with 6 or less months experience will not have a caseload of more than 15 customers.
2. Coaches with 6 months or more experience will not exceed a caseload of 20 customers.

Updated 12/2009

1.12 Background Checks

A DSS/CPS Central Registry check and Virginia State Police Background check, including fingerprinting, will be performed on all employees. Hiring is contingent upon the results of these background checks. Upon a job offer, SUI will provide the potential employee with the DSS/CPS Registry Check form and the SP-24 form and fingerprint card for the Virginia State Police Background check for completion. Stand Up will not hire any individual that has been convicted of a barrier crime, as outlined by the Commonwealth of Virginia, within seven years of a conviction. The results of these background checks will remain in the employee's file. All existing employees will be screened monthly by administration through the HHS-OIG List of Excluded Individuals and Entities website to ensure that Stand Up continues to meet Federal and State program integrity levels. All new employees must have background checks submitted before providing services to customers.

Staff will also complete the VA Department of Social Services Check of the central registry. This check will be submitted before any employee works independently with customers and the registry check must be returned clear for employees to maintain employment with SUI.

If any employee is found to have been convicted of a barrier crime, including current employees, employment may be terminated. If an employee is charged with a barrier crime while employed for SUI, employment may be terminated. Any employee charged with a barrier crime, while employed by Stand Up, will meet with SUI leadership to determine their employment status within 10 days of SUI becoming aware of the charge to determine the employee’s continued status with SUI.

Background checks will be completed every three years from the employee's initial background check.

Updated 09/2018

1.13. Job Descriptions

Job descriptions will be in place for all employees of Stand Up. These descriptions will clearly identify the requirements for each position as well as the skills and/or characteristics needed to perform the position.
Job descriptions will be reviewed and updated annually if necessary during the month of January.

Created 8/2009

1.14. Communication Policy

Much of company interpersonal contact is done via phone or email. Due to this, the accompanying policy applies for all interoffice and out of office work-related communication:

Emails: All emails must be answered within a 24 hour period (excluding weekends-emails sent Friday should be answered by Monday). If an email requires further research before answering, respond to the email letting the sender know you will get back with them in a timely manner. If this policy is not followed, the corrective action policy will be utilized.

Phone calls: All phone calls should be returned within a 24 hour period (excluding weekends-phone messages received on the weekend will be returned Monday). Should a phone call need emergency assistance (even if on the weekend), the employee is to contact the proper authorities (if it is life-threatening), then call their supervisor immediately for assistance.

Deadlines: All deadlines are expected to be adhered to. Should there be an extenuating circumstance requiring late submission, it is the employee's responsibility to inform their supervisor as soon as they are aware of the issue, to arrange submission at a later, agreed upon time. If deadlines are not met as outlined, the SUI corrective action policy will be utilized.

Updated 05/2012

1.15. Flex time policy

- All employees must have their calendar posted in Google Docs for the following week by Friday at 5:00pm. If your calendar is not posted by the given deadline the corrective action policy will be utilized.
- If any employee chooses to work their hours in less than 5 days, they are still responsible for returning calls and emails on their day off by the end of the work day, if a response is needed.
- No approvals from Department Heads are required, as long as your Google calendar is accurate and contacts to the coach are returned as needed.
- If you are a full time employee, you are expected to work forty hours. If hours are not available to reach your full forty hours, please see your direct supervisor. These cases will be handled on a case by case basis.
- For each month, employees should divide their total available hours (billable and non-billable) by the number of weeks in the month. Each employee is expected to utilize that number of hours for every week in the month. If customer needs or scheduling makes this difficult, speak to your supervisor. If an employee is not utilizing their hours in this manner, the corrective action policy may be utilized.
- Overtime hours are not required if your allotted time exceeds forty hours a week.

Updated 05/2012

1.16. Organizational Chart

Please see separate organizational chart form.

Updated 1/2018

1.17. Leadership Overview

The following is a breakdown of the roles of the leadership roles within Stand Up, Inc. This is not a full job description, but rather a reference tool for overall responsibility roles.

President:

- To provide strategic planning and vision for viability and future growth
- To work with the Exec. Dir. to provide employees and managers with a final decision to issues of contention
- To provide budgetary discipline
- To network and expand the brand of Stand Up, Inc.
- Currently serving as Director of SE

Executive Director:

- Management of Department Heads
- Human Resources
- CARF management
- Payroll
- Oversee all SUI programs
- Accounts Payable/Accounts Receivable

Coordinator of Transition and PreEts Services:

- IEP meeting coordinator
- Marketing and Contracting with schools
- School Funded SE
- STEP program
- Individual Pre-Vocational services
- POC for school systems
- Transition related paperwork, including grading
- Oversee Transition customer progress

Director of Supported Employment

- Manages all employees in SE department, including regional supervisors
- All SE related paperwork, including reports
- Oversee SE customer progress
- POC for DARS
- Oversee SUI's role service provider role in quarterly and annual meetings for customers

Medicaid Program manager

- Manages all employees in Medicaid services
- All Medicaid related paperwork
- POC for CSB's and DBHDS
- Oversees customer progress

1.18 Confidentiality of Employee Information

Stand Up Leadership and management will make every effort to protect the confidential information of employees. This includes personnel records, disciplinary actions, health related information, billing information and any other information that may deemed personal and confidential. Records will remain in a locked cabinet and only authorized staff will have access to information that is confidential. This is to include any other confidential administrative records. Data management systems will be password protected. HIPAA standards are reviewed and implemented, including encrypted emails regarding confidential information. Employee and customer records will be retained for seven years, as is required by Virginia law. Records that are stored off site will be stored in a locked cabinet.

Updated 04/2017

1.19 Continuing Education

When a need for a specific educational need is present at SUI, SUI may pay for a continuing education course. To qualify, current employees must have been with SUI for at least one year, in good standing (no more than 1 written warning) and has a knowledge base of the topic that will fulfill the current need (i.e. sign language, etc.) can apply for continuing education assistance.

If training or education is needed to provide best supports for a particular customer or need, please speak with your direct supervisor for training supports or opportunities to assist each employee meet the specific needs of their customer.

Updated 2/2016

1.20. Public Relations/Media Contact

Stand Up Inc. employees will not speak with members of the media without the approval of the Executive Director. Typically, representation of SUI to media outlets of any kind will be handled by SUI leadership or the Business Developer.

Updated 07/2012

1.21. Stand Up, Inc 401K Plan 80945

1. Adding employees to the MassMutual site. www.massmutual.com/planaccess
    a. HR will add the new hire to the website. The following information is required:
        i. Name
        ii. Social Security
        iii. Address
        iv. Date of Birth
        v. Date of Hire
    b. Once the employee becomes eligible for deferrals, HR will receive an email from MassMutual the following Monday stating that they are eligible.
2. Informing employees
    a. On the employee's first day of employment they will meet with HR to discuss the available benefit options.
    b. On the employee's 90 day review they will again meet with HR to discuss access to the site and be provided the benefit flyer and/or booklet for enrollment information. The employee can enroll in the plan and be eligible after their 90 days of employment.
    c. The employee must wait until the quarterly enrollment date before a deduction can be made to the plan and be considered an active employee. Quarterly dates are January 1, April 1, July 1, and October 1.
    d. The employee will have access to all the investment options and funds available through the MassMutual retirement website. The employee will select their investments and enter the deferral percentage. The website for access is www.massmutual.com/retirementaccess
        i. Employee will use their social security number as their log in.
        ii. Employee will use their date of birth (MM/DD/YYYY) as their password.
    e. The employee can reach out to Ben Berry at 434-239-PLAN (7526) with any questions about investment options. For problems with the website contact 1-800-854-0647.
    f. An employee is 100% vested after 3 years of employment.
3. Processing a payment

a. After an employee has signed up for the plan HR will receive an email with the employee's deferral percentage. HR will add a payroll deduction to their paycheck based off what the employee selected.
    i. In QB click on Edit Employee
    ii. Payroll Info
    iii. Add Deduction
        1. If the employee signed up for a before tax contribution, choose 401K Emp.
        2. If the employee signed up for an after tax contribution, choose Roth 401K Emp.
    iv. Verify the percentage deduction matches what the employee chose. The default percentage is 2%.
b. When payroll is processed, verify employee's deductions are accurate and enter the amounts in to the MassMutual plan access site. www.massmutual.com/planaccess
    i. HR will log in and click on Payroll.
    ii. Click on Action link next to the last payroll date and a drop down menu appears, click on Model. A new payroll is generated based off just the active employees.
    iii. Enter the amounts that were deducted from the employee's paychecks into their plan accounts.
        1. Elective Deferral is before tax contributions.
        2. Roth Elective Deferral is after tax contributions.
c. HR will add the 2% company match to the employee's plan through the MassMutual website.

4. Employee Loans/Withdrawals
    a. If an employee is interested in a Loan against their 401K he/she needs to contact HR for the form to complete.
        i. The minimum amount available to borrow is $1000
        ii. The maximum amount available to borrow is $50,000 or ½ of what the amount is in the employee's account.
        iii. The loan interest is 4.5% paid back to the employee's plan account.
    b. The employee will return the form to HR and it will be provided to the Executive Director for final approval.

c. If the loan is approved, HR will fax the form to MassMutual. MassMutual will review the form and then cut the employee a check off of their plan account.
d. The employee should contact MassMutual for information on withdrawing from the plan at 1-800-854-0647.

Created 6/2016

2. Business Practices

2.1 File Maintenance

1. When a new customer begins services with SUI, a customer profile will be created in Lauris.

2. Each customer profile will include the following:

a. Intake Form
b. Mock application
c. Person Centered Plan
d. Social Security Release Form (optional)
e. Consent to Release
f. Medication Use Profile
g. Background Check Consent Form
h. Consent to Photograph
i. Emergency Data
j. Needs/Risk Assessment
k. Signature Form
l. Voluntary Disclosure Form
m. Certificate of Eligibility (for DARS customers)
n. Employment Plan (for DARS customers)
o. Case Notes
p. Training Checklist/Task Analysis Forms for customers who are employed
q. Exit Summaries
r. Waiver Customers will have additional requirements as detailed by their funding agency

3. For customers receiving services prior to February 2015, any paperwork completed before this date can be found using the following directions:

a. Click the Customer Icon on Lauris home page.

b. Search for Customer name and select the magnifying glass located next to customer name.

c. On the customer page, select Active File link at top of page.

d. All sections are identified by the horizontal table of contents on top of page.

e. Documents can be viewed via a document viewer that is available to download under the Downloads Icon on the home page.

4. For customers beginning services February 2015 or after, paperwork completed can be found using the following direction:

a. Click the Customer Icon on Lauris home page.

b. Search for Customer name and select the magnifying glass located next to customer name.

c. On the customer page, select Documents link at the top of the page.

d. Select the date of paperwork you want to view, click on select and see all paperwork submitted for customer.

5. When a customer's case is closed, the job coach will submit an exit summary to the appropriate director. The director will submit Lauris Temporary Discharge Form using the following directions:

a. Click the Customer Icon on Lauris home page

b. Search for Customer name and select the magnifying glass located next to customer name.

c. On the customer page, select Add a Session.

d. Under forms, choose Lauris System Forms

e. Select Lauris Temporary Discharge Form

f. Fill in Discharge Date and Discharge Reason and select Process Form.

g. Customer information can be found under Discharged Customer Link on Customer page.

6. If a customer re-enters services, Director will follow above steps a-d and choose Lauris Reactivation Form. Choose re-admit date and activation reason and select Process Form.

Updated 2/2015

2.2. Money Handling

All decisions regarding financial decisions, including purchasing, is at the discretion of Dan and Kelly Reichard.

- Stand Up keeps no cash on hand
- Stand Up does not accept cash or credit/debit cards for payment
- For procedures for handling checks, please see the make deposits section of this manual
- Stand Up does not participate in fundraising efforts on behalf of Stand Up

Updated 2/2016

2.3. Corporate Compliance

This policy is reviewed with employees on an annual basis. This is documented in employee personnel files.

PURPOSE: To establish and publish the official policy of Stand Up regarding the organization's corporate compliance program and plan.

POLICY: Stand Up is dedicated to the delivery of human services in an environment characterized by strict conformance with the highest standards of accountability for administration, clinical, business, marketing and financial management. Stand Up's leadership is fully committed to the need to prevent and detect fraud, fiscal mismanagement and misappropriation offends and therefore, to the development of a formal corporate compliance program to ensure ongoing monitoring and conformance with all legal and regulatory requirements. Further, the organization is committed to the establishment, implementation and maintenance of a corporate compliance program that emphasizes (1) prevention of wrong doing—whether intentional or unintentional, (2) immediate reporting and investigation of questionable activities and practices without consequences to the reporting party and (3) timely correction of any situation which puts the organization, its leadership or staff, funding sources or customers at risk.

PROCEDURE: By formal resolution, Stand Up has delegated overall responsibility for the Corporate Compliance Program to the President. The President shall (1) chair the organization's corporate compliance team and serve as the organization's primary point of contact for all corporate compliance issues, including scheduling team meetings, reporting on team activities and making recommendations as required; (2) develop, implement and monitor—on a regular and consistent basis—the organization's corporate compliance plan, including all internal and external monitoring, auditing, investigative and reporting processes, procedures and systems; (3) prepare, submit and present periodic reports as may be required to provide clear communication to the organization's leadership for corporate compliance oversight; and (4) coordinate development of the organization's formal corporate compliance plan.

The President shall submit an annual report that will, include at a minimum, include: (1) a summary of all allegations, investigations and/or complaints processed in the preceding 12 months in conjunction with the corporate compliance program, (2) a complete description of all corrective action(s) taken, and (3) any recommendations for changes to the organization's policies and/or procedures.

Introduction to Corporate Compliance

As part of corporate compliance plan development, the President shall schedule, coordinate and monitor regular and periodic reviews of risk areas by competent persons external to the organization. Such reviews will be conducted as a way to ensure ongoing conformance with billing, accounting and collection regulations imposed by the federal government and other "third party" funding sources. More critically, these reviews will augment the organization's annual audit of its accounting system and provide an additional, internal measure to ensure conformance with billing and coding policies and practice that will withstand the scrutiny of any regulatory audit or examination.

2.3.a. LEIE Reviews

Administration shall complete the LEIE search at the date of hire for each new employee and monthly for existing employees. This documentation is retained every time the search is conducted and maintained in a file labeled Medicaid Fraud list. If the employee's name is not listed, checks will continue as schedule. If an employee is found on the list, it is then verified with their social security number and the employee is no longer eligible for employment with SUI, effective immediately.

Updated 3/2018

2.4. Outcome Measurement

Data Collection: The following data is collected and tracked by Stand Up staff in order to assess and improve upon service and business function. In addition to this process, Stand Up develops a performance management system annually that outlines business and service goals for the year. This information is available in Stand Up's Performance Improvement Guide.

1. When a customer begins services an intake is conducted in order to provide biographical information as well as information needed to provide the appropriate services. From this information, Stand Up tracks factors to each customer to include:
    - Gender
    - Race
    - Age
    - Education
    - Location
    - Status code
    - Benefits received

2. When a customer exits services with SUI, an exit summary is completed by their job coach. The following information is collected:

- Amount of time spend in Job development services if applicable
- Closure information if applicable

3. When a customer receives a position, the job coach completes a training checklist and the following information is gathered for the outcome measurement data:

- Type of employment received
- Pay rate
- Benefits received
- Full time or part time status

4. Financial Information: Financial information is collected in budgets, quarterly reviews and compilations of year over year analysis are gathered.
The historical information in analyzed and use to create the budget and plans for future planning.

5. Accessibility information is gathered and reviewed annually in order to ensure services as accessible for all stakeholders.

6. Surveys are gathered in person, through email, mail and through the Stand Up website. These results are gathered annually and reviewed for planning annually.

7. Human Resource information is gathered through personnel and turnover reporting, comparable positions the area that Stand Up serves is analyzed to ensure Stand Up remains a competitive employer in our service area, surveys and reviews are also reviewed to gain employee feedback. This information is used to guide Stand Up’s HR decisions.

8. Technology: Stand Up uses feedback from all stakeholders to improve upon our technological resources while continuing to ensure that all people are able to gain access to information through their preferable source.
Staff are trained upon hire and annually thereafter, on each of these forms in order to better ensure accuracy.

9. Health and Safety reports are reviewed for needed improvements or trainings to ensure our staff and stakeholders can work and receive services in a safe environment. These reviews occur annually.

10. Stand Up remains current regarding field trends and best practices through involvements in APSE, ACCSESS, State provision and leadership boards and attending local and state level provider meetings and trainings.

11. Stand Up then uses the information collected to guide our strategic plans and other planning items to guide our organization. Using this information guides Stand Up in providing the best services for customers, a rewarding experience for employees, and allows the business to continue to grow. Stand Up is constantly, both informally and formally, using this information to guide the future of Stand Up. Annual goals are created and reviewed for both business and service functions using the gathered information.

This information is tracked and recorded and entered into the outcome measurement database and other varying tracking tools. Annually, this information is used to generate findings for the outcome measurement report. This report is made available to our stakeholders and is submitted to DARS for review. This report is to include our success rate to be compared to the success rate set forth by DARS as our yearly goal. In addition to the goals set for SUI by other organization, SUI leadership determines goals by department to address our effectiveness, efficiency as well as satisfaction and service access. Each department head will track these factors for their respective departments. This information is also compared to SUI's strategic plan in order to make any needed adjustments for planning, trainings and continued adherence to SUI performance goals. Customer's names are not used in order to protect confidentiality. This information is reviewed quarterly to ensure the accurate and complete gathering of information. This is done by cross referencing the data recorded with reports and customer files to ensure the information gathered is accurate. This spot check is to be recorded and kept in the outcome measurement file. Before using the database information for the annual preparation of the OM report, SUI also cross checks the information for completeness by comparing the numbers in the database to the billed service records in Lauris

Updated 1/2016

2.5. Survey of Stakeholders

1. Surveys will be provided to all stakeholders in Stand Up, at minimum, annually. Surveys are also available on our website.
2. For JD, JC, ILS, SA, Waiver Customers and Pre-Vocational Training Customers:
    a. When a customer completes a service, the job coach/Stand Up employee will provide the customer a survey corresponding with the service they are completing. A self-addressed, pre-posted envelope will be included if the survey is provided by mail.
    b. Department Heads will also provide surveys when the complete a spot check on site where a customer is working.
3. Employee surveys:
    a. Employee surveys are distributed annually to each employee of Stand Up.
    b. Employees anonymously return completed surveys in a box located in the main office.
4. Employer surveys:
    a. Job coaches provide employer surveys 30 days after each customer begins work
    b. If the survey is provided by mail, a self-addressed, stamped envelope shall be included

    c. The business developer will also provide surveys when meeting with employment partners
5. Counselor/Case Manager Surveys:
    a. Such surveys are distributed by mail annually in November.
6. Surveys are tabulated and provided to the Executive Director annually at the end of the fiscal year for review.

Updated 11/2013

2.6. Accommodation Requests

1. Any stakeholder may receive an accommodation request from their Stand Up representative or forms are available by request from the Lynchburg office.
2. When a request is made, the request is forwarded to the President for review.
3. The President will decide within one week of receiving the request and if the request is approved, the request is fulfilled within one month.
4. If Stand Up cannot meet a reasonable request for an accommodation within a timely manner, Stand Up will refer the individual to another agency that can better meet the customer's needs and assist with the transition.

Created 8/2009

2.7. Technology Plan

1. Stand Up utilizes QuickBooks Enterprise for all time tracking, billing, bookkeeping, banking, reporting and vendor information. QuickBooks is backed up following every payroll, at minimum. Stand Up's accountant maintains a copy of our back up file off site in case of an emergency.

2. All customer records are stored in Lauris, an online customer management system. The Lauris system has a backup system managed by the program development team and backups of all files occur regularly. All Lauris accounts are password protected.
3. Each computer has a minimum of a virus protection program and spy ware protection. Stand Up uses both Norton and AVG anti-virus protection on all company owned computers. Updates are completed as needed.
4. Folder share is utilized on all Stand Up computers to back up all pertinent information.
5. Stand Up outsources with an IT company to manage, oversee and protect our computer systems. IT reviews and updates all SUI computers monthly and ensure the integrity of SUI computer systems. IT periodically reviews SUI's tech systems and provides suggestions and feedback as applicable to needed improvements.
6. All Stand Up employees are required to have a cell phone. Each full-time employee receives a $50/month allowance and part time employees are allotted $25/month in order to maintain a cell phone. Full time SE job coaches may also receive an extra $15/month for use of a smartphone and data plan.
7. Stand Up computers which are used for administrative purposes are networked to allow for information to be shared as necessary.
8. Each employee is to have an email address in order to receive information in a timely manner. Upon the change of an email address change, the employee is to notify all stakeholders immediately. Emails should be checked daily.
9. Stand Up's website is Standup-inc.com
10. If any confidential information is contained within a company computer, then that computer must be password protected.
11. Any information necessary for company business to continue smoothly must be backed up on a monthly basis and kept off site in order to ensure its availability if needed. Folder share should be utilized whenever possible

to serve this purpose. Each director is responsible for backing up and maintaining the backups of their computers.

12. Each confidential email that is sent by a Stand Up staff member will have a confidentiality notice attached. This notice is updated annually and can be requested from Human Resources if needed.
13. All Stand Up computers will be password protected and SUI leadership will maintain the passwords for all SUI computers.
14. Backups of all essential systems are also kept in a ‘cloud’ system so that easy access is available in the event of a disaster.
15. In order to provide Assistive Technology when needed or appropriate, SUI utilized many methods including: TTY, Video Relay, Telephone Relay, Texting, IPods and IPads, smartphones, and many other methods to assist any stakeholder as needed. Assistance is addressed on a case by case method and is addressed as needed in person centered plans as well as by SUI’s accommodation request procedure.
16. Some SUI documentation is also kept on resources such as Google Drive, Google Calendar and Dropbox for ease of access and continued access in case of an emergency. In addition, SUI utilized backups of many of these items in an offsite location.
17. Virtru, an email encryption service, will be utilized for any emails that include confidential or private information that are sent out of the Stand Up domain. Inter-agency emails are automatically encrypted to ensure privacy.
18. SUI leadership continually researches, tests and analyzes our technology assistance to find areas that may be improved by emerging technologies and to ensure our current systems work properly.
19. Technology related policies are reviewed annually to ensure they remain current and effective.

Reviewed 1/2018

2.8. Entering bills

1. All bills are requested to be sent to Stand Up’s PO Box

2. Bills are entered into QB as soon as they are received.

3. QB process is as follows:

- Log in under Admin
- Click on ‘enter bills and expenses on home page
- Enter Vendor name
- Date bill received
- Bill due date
- Enter amount due
- Click save and close
- File bill under correct vendor

Created 8/2009

2.9. Paying bills

1. Each Monday, all due bills are paid
2. QB process as follows:
    - Log in under Admin
    - Click on pay bills on home page
    - Select all bills due
    - Click pay selected bills
    - Print checks
    - Stable check stub to original bill and file

Created 8/2009

2.9. B. Making Deposits

1. DARS, Medicaid and Amherst County School payments are automatically deposited into SunTrust Business account
2. All other checks are deposited manually; deposit slips are located in ED’s office.
3. Entering into QuickBooks:
    - Following receiving payments by customer, click record deposits on QB homepage
    - Select all invoices received that are to be deposited
    - Click save and close. Deposit will automatically transfer to check register.

Updated 3/2015

Taxes: Local, state, federal

1. All taxes are handled by Suntrust
2. Following each payroll, Suntrust uses the submitted payroll information to complete and submit required taxes.
3. A report is available through the Suntrust website and is reviewed by SUI President.
4. Suntrust payroll also sends out W-2's, reports to Social Security, etc. Contract with Miller and Associates P.C. details all services provided.

Updated 2/2018

2.10. Time sheets

A. Transition, Medicaid and Non Billable Time

Time sheets are submitted through case notes/notation logs and are done through Lauris. These are submitted within 24 hours of working with a customer. When doing non-billable for all departments, these are submitted by each job coach within 24 hours of the time. When submitting non billable time the steps are as followed:

1. Log in to Lauris
2. Click 'Add Session'
3. Change 'Customer Type' to Staff
4. Select your name
5. Select 'Time Sheet 2.0' and continue
6. Fill in date, total time worked and select the school program or NB from the drop down menu.
7. In notes section separate your time in TT, PT, PC In the 'Notes' section separate your total time into PT and TT (ex. 1.50 PT 1.00TT). Give explanation if NB time.
8. Click 'Process Form'

B. SE Services Time

Time is submitted via Lauris SE case note. Case notes are due daily. Once case note has been submitted, the administrative staff inputs each coaches time into QuickBooks.

Updated 2/2018

2.11. Reports, billing and invoices

A. Transition

Interim Reports

1. Log in to Lauris
2. Click ‘Add Session’
3. Select the customer name from the drop down menu under ‘Unique ID’
4. Select ‘STEP Interim Report ‘from the drop down menu under ‘Choose Form’ and select continue
5. Enter the date and fill in each section by answering ‘Yes’ or ‘No’
6. In the ‘Notes’ section give a brief summary of the customer’s progress.
7. Select Director of Transition Services as the ‘Approver’
8. Click ‘Process Form’

Progress Reports

1. Log in to Lauris
2. Click ‘Add Session’
3. Select customer name from the drop down menu under ‘Unique ID’
4. Select ‘STEP Report’ from the drop down menu under ‘Choose Form’ and select continue
5. Fill in:
    a. Date
    b. All information in each section
    c. A brief summary of the customers progress needs to be documented under ‘Summary’
    d. Select Director of Transition Services as the ‘Approver’
6. Click ‘Process form’

Invoices:

1. Log into QuickBooks
2. Select ‘Reports’ from the home page
3. Select ‘Job, Time, Mileage’ and ‘Time by Job Detail’
4. When the window pops up, change the date for the previous month
5. Select ‘Customize Report’
6. Select ‘Filter’
7. Select ‘Customer Job’ and enter in each school and print
8. Once all reports are printed, select ‘Create Invoice’ on the home screen
9. Enter the school name in ‘Customer Job’
10. Under ‘Item Description’ break down billing for the month.
    a. ‘School name’ On site – number of days on site (specific dates)
    b. ‘School name’ Classroom – number of days in the classroom (specific dates)
    c. ‘School name’ travel time – number of days billed for travel time (specific dates)
    d. ‘School name’ paperwork – breakdown of the number of students bill for paperwork
11. Save and print the invoice
12. Mail to the appropriate school and POC.

B. Medicaid Services:

1) No monthly reports for Medicaid. Quarterly report and annual plans are due according to the customer’s plan year.

<u>Invoice:</u>

1) To create and invoice, log into QuickBooks
2) Click on invoices on home page
3) Enter customer name under customer job, Last Name, First Name
4) Ensure funding agency is listed in “Bill” along with customer’s name
5) Under “Item” Enter the customer code
6) Enter hours billed under hours/ quantity

7) Rate and amount appear automatically
8) Save and close

Receiving Medicaid Payments:

1) Before posting payment in QuickBooks, match the totals on the remittance log to the billing log for the appropriate billing cycle.
2) Log into QuickBooks.
3) Click on receive payments on the home page.
4) Enter customer name in the received from field.
5) Select the date based on the date posted on the remittance log.
6) Select the appropriate invoice (this can be determined based on the billing cycle dates listed on the remittance log).
7) Click save and new, if posting multiple payments, otherwise select save and close.
8) After selecting save and close, go back to the home screen (Deposits).
9) On the home page of QuickBooks, select record deposits.
10) On the pop-up screen, hit select all.
11) Ensure payments subtotal matches total on remittance log.
12) If total matches, select okay on pop-up screen.
13) On the deposit screen, make sure deposit total matches total listed on remittance log.
14) Select save and close.

C. SE Services

1. Reports

- All SE end of month reports are completed and submitted in Lauris by the job coach.
- Reports are due by 8am on the first day of each month.
- The Director of SE prints up two Billing Reports using the following directions:
    - On Lauris home page, select the Reports icon.
    - Click on Custom Views link.
    - Click on the magnifying glass next to the PT, PC, TT Time Report
    - In the two Date boxes, select the first and last day of the month.
    - Select Show Report

    - Select and drag Customer Name up to Column Header to sort by Customer.
    - Print Form.
    - Return to Lauris home page and select the Report Icon
    - Select Billing Details Report Link
    - Choose first/last day of month for Date of Contact
    - Select and drag Customer name up to Column Header to sort by Customer name.
    - Print Report.
- On Lauris home page, select Customer Icon.
- Beginning in alphabetical order, click on the magnifying glass next to each SE customer and follow these steps:
    - On the individual customer home page, select Add a Session.
    - Under Forms, choose Monthly Case Note.
    - For Date: choose last date of the month.
    - Select appropriate month from the drop down list.
    - For Start date: choose first date of appropriate month.
    - For End date: choose last date of appropriate month.
    - Change staff name to appropriate job coach.
    - Select appropriate status from drop down list.
    - Click Update Form.
    - When PDF comes up, select Print and change Printer to Save as PDF.
    - Save file with the following title format: LastFI_MonthYear_CN.
    - File is saved under Dropbox>Reports>Month>Counselor
    - On the individual customer home page, select Documents.
    - Find the most recent report submitted (Job Development, Placement & Training, Situational Assessment, or LTESS) and select Edit Form.
    - Review the form to make sure all blanks have been filled in and the information is correct.
    - Using the information from the Billing Details report, fill in the authorization number, number of hours authorized, number of hours billed as well as Amount due.

- o For Job Development Reports, select the first/last date of month of Employment Data.
- o Using the PT/PC/TT Report, input the number of hours used for: PT/PC, TT/ and Documentation.
- o Process Form.
- o When PDF comes up, select Print and Change Printer to Save as PDF.
- o Save file with the following title format: LastFI_MonthYEAR_Report
- o File is saved under Dropbox>Reports>Month>Counselor
- o When all reports have been edited and saved, print up the following reports via the Reports Icon on Lauris home page and Custom View:
  - JD Reports Total
  - P&T Report
  - SA Report
- o These reports are given to the Executive Director who will use to complete invoices in QB.

When all end of month documentation has been saved to the appropriate dropbox folder, the Director of SE will email all documentation to the funding agency.

Updated 05/2015

2.12. Receiving invoices

Invoices are entered upon receipt.

DARS: Uses EDI remittance

- ED and President have user name and password.
- Note: In case of an emergency/death of Stand Up leadership, these (along with all needed names and passwords) are kept by Raymond Wood 434-239-4610 as well as with our accountant, Miller and Associates P.C..
- Log into EDI website and click on current remittances. Go to remittance detail and print out invoice names and amounts.

- Log into QuickBooks
- Click on receive payments on the home page
- Enter customer name in the received from field
- Click on the appropriate invoice (this can be determined by the date and invoice number which is noted on the EDI homepage
- Click save and close

STEP and school services:

- Checks are mailed to the post office box, 10312
- Follow the instructions from above in order to receive payment in QuickBooks

ACS:

- Payments are automatically deposited into SUI's SunTrust checking account
- Follow the instructions from above in order to receive payments into QuickBooks

Receiving Medicaid Payments:

1. Before posting payment in QuickBooks, match totals on remittance log to billing log for the appropriate billing cycle.
2. Log into QuickBooks
3. Click on receive payments on the home page.
4. Enter customer name in the received from field.
5. Select the date based on the date posted on the remittance log
6. Select the appropriate invoice (this can be determined based on the billing cycle dates listed on the remittance log)
7. Click save and new, if posting multiple payments, otherwise select save and close
8. After selecting save and close, go back to the home screen.
9. On home page of QuickBooks, select record deposits.
10. On the pop-up screen, hit select all.
11. Ensure payments subtotal matches total on remittance log.
12. If total matches, select ok on pop-up screen.
13. On the deposit to screen, make sure deposit total matches total listed on remittance log.
14. Select save and close.

2.13. Vehicle Safety

SUI Automobile Policy

The purpose of this policy is to ensure the safety of those individuals who drive while working and to provide guidance on the proper use of company/Personal vehicles. Vehicle accidents are costly to our company, but more importantly, they may result in injury to you or others. It is the driver's responsibility to operate vehicle in a safe manner and to drive defensively to prevent injuries and property damage. As such, employers endorse all applicable state motor vehicle regulations relating to driver responsibility. The employer expects each driver to drive in a safe and courteous manner pursuant to the following safety rules. The attitude you take when behind the wheel is the single most important factor in driving safely.

All employees must have a first aid kit and emergency roadside kit located in their cars at all times. SUI will provide these kits to employees and check annually to make sure that they have all needed items available.

<u>Driving Requirements for SUI Employees:</u>
1. All SUI employees must have a valid and current Driver's License in accordance with the laws of Virginia, this will include:

Out-of-State Students

If you are enrolled as a full-time student in an accredited school in Virginia and not employed, you may drive in Virginia with a valid out-of-state (or another country) driver's license and valid out-of-state license plates on your vehicle. If you are a full-time student and employed, you are considered a resident of Virginia for the purposes of motor vehicle laws only. This does not necessarily qualify you for in-state tuition rates. Therefore, you must apply for a Virginia driver's license and register your vehicle in Virginia. You must register the vehicle in Virginia even if it is owned by someone else.

Non-residents

If you are a non-resident temporarily living in Virginia, you may drive with your home state or country driver's license and license plates for no more than six months. If you become gainfully employed, you are required to hold a Virginia driver's license. This does not apply to commercial vehicle drivers. Contact your local DMV customer service center for more information or call toll free 1-866-DMV-LINE (1-866-368- 5463) or 1-800-435-5137.

If you're a new Virginia resident,

Within **60** days of moving here, you must obtain a Virginia driver's license.

Within **30** days of moving here, you must:

- Title your vehicle in Virginia.
- Register your vehicle and obtain Virginia license plates.

To ensure that your vehicle is mechanically safe to operate on the highways of the Commonwealth, it must pass an annual vehicle safety inspection. Any vehicle registered in Virginia must display a valid safety inspection sticker. In certain localities, your vehicle also must pass an emission inspection.

Prior to registering your vehicle, you must:

- Insure your vehicle with a company authorized to do business in Virginia. At a minimum, your insurance policy must provide the following liability insurance coverage:
  - $25,000 for injury or death of one person;
  - $50,000 for injury or death of two or more people; and
  - $20,000 for property damage.
- Insure your Virginia-registered vehicle during the entire registration period even if it is not driven or is inoperable. If the vehicle is not insured, you must cancel the registration and return the license plates to DMV.
- If your vehicle is not insured, you must pay a $500 uninsured motor vehicle fee. This does not provide insurance coverage, but allows you to register and operate the vehicle in Virginia for a one-year period.

After registering your vehicle:

- You must pay any required local vehicle registration fees and obtain a local sticker or decal if required by the city or county in which you live. Contact the Commissioner of the Revenue, Treasurer or Director of Finance for the city, county or town in which you live for more information. Some localities partner with DMV and you will pay your local registration fee at the same time you obtain your state registration and license plates.

Obtain a Virginia safety inspection sticker:

- Your vehicle must pass a safety equipment state inspection and, in certain Northern Virginia localities, your vehicle also must pass an emissions inspection.

Driving records will be requested from the VA DMV for all employees at the time of hire and will be updated annually to ensure continued employee eligibility.

Driver Guidelines and Reporting Requirements:

1. Any employee who has a driver's license revoked or suspended shall immediately notify Human Resources by 9:00am the next business day, and immediately discontinue operation of any vehicle for the purpose of work for Stand Up. Failure to do so may result in disciplinary action, including termination of employment.
2. All accidents must be reported to the police, your direct supervisor and human resources. Accidents are to be reported the same day (from the scene when possible). Failing to stop after an accident and/or failure to report an accident may result in disciplinary action.
3. Drivers must report all ticket violations received during the operation of a company vehicle or while driving a personal vehicle on company business.
4. Motor Vehicle Records will be obtained on all drivers employed by STAND UP.
5. Proof of Driver's insurance will be obtained on all drivers employed by STAND UP.
6. Employees must have a valid and current Driver's license to driving for company business.
7. Employees are expected to drive in a safe and responsible manner and to maintain a good driving record. Criteria that may indicate an unacceptable record includes, but is not limited to:
    - Three or more moving violations in a year

- Three or more chargeable accidents in a year
- Any combination of accidents and/or moving violations

8. If a customer is with you and an accident occurs, you must report this immediately to human resources so that their emergency contact may be contacted.
9. Only active SUI customers are to be transported while any employee is on the clock. This includes children of customers, friends of customers, etc.
10. Cell phones are not to be used, in any capacity, while driving a SUI customer
11. The use of a cell phone is highly discouraged while driving. Please remember that texting and emailing while driving is illegal in Virginia.

<u>Driver Safety Rules:</u>
1. Driving while under the influence of intoxicants and other drugs (which could impair driving ability) is forbidden.
2. Cell phone use while driving should be kept to a minimum. Whenever possible, drivers should complete calls while parked or use a 'hands free' device while driving. While driving, attention to the road and safety should always take precedence over conducting business over the phone.
3. No driver shall operate a vehicle for company business when his/her ability to do so has been impaired by illness, fatigue, injury, or prescription medication.
4. All drivers and passengers must wear seat belts.
5. No unauthorized persons are allowed to ride in company vehicles.
6. All state and local laws must be obeyed.

Defensive Driving Guidelines:
1. Drivers are required to maintain a safe distance at all times
2. Drivers must yield the right of way at all traffic control signals and signs requiring them to do so.
3. Drivers must honor posted speed limits.
4. Turn signals must be used at the appropriate times.

All SUI employees will be provided with, and are required to maintain, a First Aid kit and Emergency Roadside Equipment kit.

<u>Transporting a Stand Up customer:</u>

Transportation of customers is not encouraged. While there will be times that transporting a customer may be necessary, it should be done as little as possible. SUI does not operate a transportation service. Customers should be encouraged, with the help of SUI and natural supports, to find reliable and cost effective transportation to and from work.
Should it become necessary to transport a customer, the employee must ensure that they are knowledgeable of and follow all applicable guidelines for safety.
Should the customer you are transporting leave the vehicle before arriving at the pre-determined destination you should:

1. Stand Up employees should search the immediate vicinity of the place the customer was last seen.
2. While searching for the customer, the employee should use their cellular phone to contact the local authorities by dialing 911.
3. Whenever a customer leaves your care unexpectedly and is under the care of a guardian or caregiver, the employee should immediately contact their emergency contact.

Accident Procedures:
1. In an attempt to minimize the results of an accident, the driver must prevent further damages or injuries and obtain all pertinent information and report it accurately.

- Call for medical aid if necessary
- Call the police if necessary
- Record names and addresses of the driver, witnesses, and occupants of other vehicles
- Call your supervisor. If a customer is with you, you must report this immediately so that their emergency contact can be contacted.
- Do not discuss the accident with anyone but the police
- Provide the other party with your name, address, driver's license number and insurance information

2. Complete accident report and submit to Human Resources

<u>Maintenance:</u>
In order to ensure that your automobile is safe and reliable please reference your owner's manual and follow instructions regarding routine maintenance.

Updated 5/2016

2.14. Payroll

1. Payroll is completed by Executive Assistant.
2. Pay days are on the 5th of each month for all employees
3. Ensure all time is entered from Department Heads.
4. Change any overtime hours from ‘hourly’ to ‘overtime’
5. Once all time has been entered, click on ‘pay employees’
6. Click on which payroll group you would like to pay.
7. Click ‘start scheduled payroll’
8. Ensure all employees to be paid are checked on the screen
9. Click continue
10. Click create paychecks
11. Print paychecks

Updated 2/2015

2.15. Conflicts of Interest and Corporate Responsibility

Correct ethical and legal conduct is particularly at the heart of the operation of a company engaged in, with, and on behalf of the public. In all matters and in all divisions, the highest professional standards must be practiced in every Stand Up activity by every Stand Up director, supervisor and employee to guarantee the independence and the integrity of all our services. We believe respect for others and our commitment to diversity represents vital strengths of our Company. In every case, necessary safeguards must be maintained to prevent any action or any association that might reflect adversely, directly or indirectly, upon Stand Up.

A “conflict of interest” exists when a person’s private interest interferes in any way with the interests of the Company. A conflict situation can arise when a director, supervisor or employee takes actions or has interests that may make it difficult to perform his or her Company work objectively and effectively. Conflicts of interest also arise when a director, supervisor or employee, or members of his or her family, receives improper personal benefits as a result of his or her position with the Company.

Appearance of Impropriety: Directors, supervisors and employees should take care to avoid any appearance of impropriety and will disclose to their supervisors any material transaction or relationship that could be expected to give rise to a conflict of interest.

Organizational Fundraising: Fundraising on behalf of Stand Up is not permitted by any employee of Stand Up. Stand up does not fundraise for the organization.

Outside Interests: Directors, supervisors and employees will not have any outside interest, investment or business relationship that dilutes their loyalty to the Company. Membership on a board of directors of a company unaffiliated with STAND UP might result in a conflict of interest and should be discussed in advance with the Executive Director.

Gifts: Payments, gifts or entertainment by or to a director, supervisor or employee in conjunction with business will be limited to normal business practices. (The U.S. tax laws' limit on deductibility of gifts is $25.) No gratuities are allowed by SUI staff.

Social Media: Stand Up recognizes the importance of using social media responsibly. All posts to Stand Up's official social media pages will be reviewed by leadership. In cases of public posts that include confidential information of customers, a release specific to the use of a person's likeness, employment status or services receives will be obtained by the individual and/or their legal guardian. Employee's may share public posts but may not use Stand Up's name or organizational information without the consent of SUI leadership.

Confidential Information: Directors, supervisors, and employees will not use confidential company information for their own advantage or profit, nor will they disclose confidential Company information, in any form, to anyone who does not need to know it in order to conduct the Company's business (except when disclosure is authorized or legally mandated). Confidential information includes all non-public information that might be of use to competitors, or harmful to the Company or its customers, if disclosed.

Marketing: Stand Up believes in responsible marketing. Marketing to any stakeholder will remain honest and forthright. Any marketing will remain in line with Stand Up's values and code of ethics, while respecting a person's right to choose what is right for each individual.

Human Resources: At Stand Up, we set high standards for the way we conduct business – in areas from corporate and social responsibility to sound business ethics, including compliance with all applicable laws and regulations.
These principles apply to all employees. However, they are not meant to describe the full scope of human resource policies or practices. Employees are required to comply with all policies, procedures and practices at all times and are responsible for consulting their management if they have any questions.

Child labor: SUI will not use child labor. The term "child" refers to any employed person under the age of 16, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest.

Wages and benefits: SUI will, at a minimum, comply with all applicable wage and hour laws and regulations, including those relating to minimum wages, overtime hours, nonexempt or exemption classification and other elements of compensation.

Working hours: SUI will not exceed maximum hours of work prescribed by law and will appropriately compensate overtime. Employees will not be required to work more than 60 hours per week, including overtime, except in extraordinary business circumstances with their consent or where the nature of the position requires such work, as for exempt employees and employees in executive, managerial or professional positions.

Freedom of association: SUI will respect the legal rights of its employees to join or to refrain from joining worker organizations, including labor organizations or trade unions. SUI complies with legal requirements worldwide regarding employee and third-party involvement. SUI respects the rights of employees to organize and makes managers at all levels aware of those rights. The company's long-standing belief is that the interests of SUI and its employees are best served through a favorable, collaborative work environment with direct communication between employees and management. SUI endeavors to establish such favorable employment conditions, to promote positive relationships between employees and managers, to facilitate employee communications, and to support employee development.

Professionalism: Employees should act in a manner that demonstrates exemplary professional conduct. Professionalism requires behaving with dignity and courtesy to customers, fellow professionals, and others in business-related activities. Employees cooperate with others to enhance and maintain the profession's public image and improve the quality of services.

CORPORATE PAYMENTS

Contributions: Personal contributions to political parties or candidates are a matter of individual choice. Such contributions may not be represented as being on behalf of the Company.

Entries: Company funds will be used only for business purposes and all must be recorded. Fund usage must be only for the described purpose and backed by appropriate supporting documents. Directors, supervisors and employees will cooperate fully with our independent auditors.

COMPLIANCE WITH LAWS

It is Stand Up firmly established policy to comply fully with all laws affecting its business. The consequences to Stand Up and its directors, supervisors and employees of any departure from this policy can be very serious. It is Stand Up's policy to cooperate with all government investigations of possible unlawful conduct. If a criminal violation has occurred, the Company will take appropriate steps to stop the criminal conduct and to prevent such conduct from reoccurring.

Stand Up will also actively communicate with Stand Up's lawyers, state and federal agencies in order to ensure we remain up to date with all laws and regulations that affect our business practices.

CORPORATE OPPORTUNITIES

Employees, supervisors and directors may not (a) take for themselves personal opportunities that are discovered through the use of corporate property, information, or position; (b) use corporate property, information, or position for personal gain; or (c) compete with the Company. Employees, supervisors and directors owe a duty to the Company to advance its legitimate interests when the opportunity to do so arises.

PROTECTION AND PROPER USE OF COMPANY ASSETS

All directors, supervisors, and employees should protect the Company's assets and ensure their efficient use. Theft, carelessness and waste have a direct impact on the Company's profitability. All Company assets should be used for legitimate business purposes.

Protection of Visitors, personnel, customers and other stakeholders

No employee should violate the personal rights of any SUI stakeholder. Personal property is to be respected and not used by any unauthorized user.

Personal Fundraising

Personal Fundraising is prohibited for customers, counselors, case managers, school system employees and students, business partners and their employees. Fundraising is allowed among SUI staff, but respect of co-workers is encouraged, and harassment is prohibited.

Witnessing of documents

Witnessing of personal, non job related, documents for customers is prohibited by SUI staff. If you have questions regarding this rule, please speak with the ED for further clarification or guidance.

Personal Relationships/Boundaries

It is of the upmost importance that job coaches retain a professional relationship with the customers we serve. Dating customers is prohibited while working for SUI. Appropriate boundaries between the Job coach and customers must be maintained. This included not providing gifts or money to customers. If you feel that a personal relationship with a customer may interfere with your ability to objectively assist any customer, please speak with your direct supervisor so that the customer may be transferred to another JC. For further clarification, please speak with the ED.

GENERAL COMPLIANCE; DISCIPLINARY ACTION

Each director, officer and employee are expected to report what he or she believes in good faith are violations of the law or Company policy, whether accidental or deliberate, by any Stand Up director, supervisor or employee. If you become aware of any conflict, relationship, payment or other action, involving yourself or others, which could conflict with these policies, it is your obligation to disclose the matter fully and in writing to your supervisors. The knowing failure to report a violation is itself a violation of Company policy. Reports of violations will be reviewed and acted upon within thirty business days and in a manner consistent with the circumstances.

Employees will not be disciplined or suffer retribution for reporting honestly and in good faith suspected or actual violations.

This policy highlights some of the more frequent ethical questions you may face at work. The items described in this policy are not meant to be exhaustive. If you are unsure as to whether any situation might result in a violation of this policy, you should discuss the matter with your supervisor.

Updated 2/2018

2.16. Mission Statement

The Mission of Stand Up, Inc. is to assist individuals increase their independence by providing unequaled personalized planning, supports and opportunities for success.

In order to ensure that Stand Up's Mission Statement remains relevant, Stand Up leadership will review and, if necessary, adjust the mission on an annual basis in January. Leadership will utilize input from stakeholders as well as Stand Up's outcomes in order to determine if the mission remains relevant. Leadership will also consider if Stand Up is ethically and effectively achieving its mission during this review.

When evaluating services, or considering new services, Stand Up leadership will use the mission statement as a guide to best determine if actions are correlating with the mission and values of Stand Up, Inc.

Updated 5/2012

2.17. Code of Ethics

The following code is provided and reviewed with every employee upon hire and is reviewed with all employees annually. Stand Up also utilizes APSE's Code of Ethics which is provided to each employee upon hire and is reviewed will all staff annually. Stand Up, Inc also commits to utilizing ethical conduct in regard to marketing, human resource practices, business operations, professional responsibilities and marketing efforts.

Code of Ethics

1. I will strive, in all of my actions and deeds, to support and promote the mission of Stand Up, Inc.

2. I will work with and be responsible to the needs of my co-workers, the people we serve, other customers and the community through teamwork and cooperation.

3. I will respect the privacy of persons served and hold in confidence all information obtained in the course of my service to them.

4. I will commit to striving for a better understanding of and dedication to those we serve as they seek to improve the quality of their own lives.

5. I will recognize everyone's right to be treated with respect and dignity.

6. I will strive for honesty and fairness in everything I do.

7. I will be open and receptive to other points of view.

8. I will not engage in or condone any form of harassment or discrimination.

9. I will not use my relationship with Stand Up to further my own interest.

10. I will conduct the business, the financial practices, any presentations and marketing actions of Stand Up in a legal, ethical and fair manner.

11. I will comply with all applicable laws, regulations and standards that are intended to safeguard both employees and the persons we serve.

12. I will make every effort to work safely and follow all safety procedures.

13. Understanding the confidential nature of our services, I will seek to protect the confidentiality of our staff, co-workers, customers, and counselors to the best of my ability at all times.

I will support these ethical standards and our shared values in my own actions, will bring violations to my colleagues' attention and will report any such action through established Stand Up procedures.

B. Violations of the Ethical Code

If at any time an employee is accused of noncompliance regarding the Stand Up code of ethics the accusation must be submitted in writing and signed by the accusing party as well as any witnesses. There will be a no reprisal approach for personnel reporting any wrongdoing. The accuser will meet with the Leadership Board in a closed session to present their accusation. Any questions by the board must be addressed to the board's full satisfaction. The accused will then be invited to respond to the accusations in front of the board. The board will decide either that further consideration must be made and will then have thirty days to hand down a decision or the board reserves the right to make an immediate decision if the board deems this appropriate. This policy will include accusations or evidence related to waste, fraud, abuse, or other wrongdoings by employees.

Created 8/2009

2.18. Contractual Relationships

Stand Up often has contracts with outside agencies, businesses or independent contractors. Executive Director will develop, negotiate and monitor all contracts with outside agencies, utilizing a lawyer's assistance for legal advice and guidance. Stand Up will utilize the following basic procedures:

A. A written contract will be developed that will contain all significant terms and conditions. Contracts will include: Roles and responsibilities of each party, services to be provided, service authorization and customer eligibility when applicable, duration of contract, policies and procedures for sharing information when applicable, plans and procedures for timely payments, conditions for termination and expected outcomes.
B. The Executive Director and President will work together to ensure overall compliance with contractual obligations for all parties identified in the agreement and also monitor the progress of contracted implementation and outcome achievement.

Created 8/2009

2.19. Waste, fraud, abuse and other wrongdoing

As outlined in Stand Up's Employee manual, customer manual and code of ethics Stand Up is committed to practicing honesty and integrity in all aspects of our business. This commitment is to our employees, customers as well as funders. Any representative of Stand Up is expected to act honestly and note work completed clearly in both case notes and timesheets. At no time is a Stand Up representative allowed to bill for work that was not completed or in any way take advantage of our billing and reimbursement system. Stand Up will maintain strict records of every billable activity in order to provide documentation to this promise.

If at any time a stakeholder of Stand Up feels that wrongdoing may have occurred, the accusation must be submitted in writing and signed by the accusing party. There will be a no reprisal approach for reporting any wrongdoing. The accuser will meet with the Leadership Board in a closed session to present their accusation. Any questions by the board must be addressed to the board's full satisfaction. The accused will then be invited to respond to the accusations in front of the board. The board will decide either that further consideration must be made and will then have thirty days to hand down a decision or the board reserves the right to make an immediate decision if the board deems this appropriate.

Created 8/2009

2.20. Debt

At this time, Stand Up has no debt. Stand Up Leadership resolves not to exceed a debt of $70,000, which maintains a less than 40% to annual revenue at all times. Stand Up will not incur any debt without precaution and with the consent of both the President and ED.

Updated 9/2016

2.21. Risk Management

Annually, a risk management plan will be developed. This will include identifications and evaluations of loss exposures, as well as how to correct such exposures, what can be done to reduce risks, actions, monitoring and reporting of results from action taken.

In this report, our insurance package will also be reviewed for adequacy to include property and liability protection. This shall meet, if not exceed, the requirements set by the Department of Rehabilitative Services and will be done with assistance and guidance from our insurance representatives.

Created 8/2009

2.22. Private Pay Customers

Occasionally, Stand Up receives customers that, being from a funding agency, desire to have services funded individually. In this case, Stand Up will follow the following procedure:

a. Stand Up will agree upon services to be provided as directed by the customer.

b. Stand Up will provide a contract to the private pay customer outlining the services to be provided and how many hours will be spent providing said service and outlining Stand Up's fee structure.
c. Stand Up will provide the customer with monthly progress reports and invoices of services provided.
d. Invoices will be due within 30 days of receipt. If invoices are not paid in a timely manner, Stand Up will reserve the right to stop services.

Created 8/2009

2.23. Medicaid Billing

SUI has contracted with Health Care Admin Services (HCAS) in Bedford VA to facilitate all billing for services provided to Waiver recipients.

Before the 1st and 15th of each month HCAS will provide SUI Director of SE Services with an email containing an EXCEL worksheet with a list of all Waiver recipients that SUI is approved to work with.

Worksheet includes the names, service code, number of authorized hours/units, and end date of service for all Waiver receipts.

The Director of SE will complete this worksheet by accurately filling in the number of hours/ units of serviced provided during the appropriate time frame as given by HCAS.

SUI utilizes a bi- monthly billing cycle.

After completing of the worksheet the Director of SE Services will email the completed form to HCAS for submission and payment at: Billing@HCAS.com and CC. Maottaway@HCAS.com

Payments are received 15 days after submission.

Updated 3/2014

2.24. Fee for services determination

Approved ESOs, as other DARS vendors, will be able to establish their own annual service fees without using a POS or the CPI-W index. In order to be able to participate in this market driven rate setting system, ESOs must meet certain criteria.

(1) ESOs must be an approved DRS vendor (this is not a system available to vendors in the application process).

(2) ESOs must have achieved a three year CARF Accreditation.

(3) ESOs must achieve CARF accreditation in specific categories related to services provided

Renewal dates for vendor's rates are set at one (1) year intervals. The yearlong intervals are agreed upon by the individual organization and the OESSP and are based on fiscal budget or calendar years.

To modify rates for the upcoming year, the vendor may submit a new rate on or by the 20th of the month prior to the expiration of the vendor rate to the OESSP coordinator one month prior to the expiration of the vendor rate.

To renew the rates at the same level, the vendor must submit a letter of extension of rates to the OESSP coordinator by the review date. The vendor must also certify whether or not there have been any significant changes in the vendor's situation, such as changes in the budget, number or qualifications of staff, number of customers served, expansion or deletion of services, etc.

Updated 7/2016

2.25. LTESS REPORTS

All LTESS reports are due by the 1st day of the month via Lauris. Follow the same directions outlined for Reports in section 2.11.
On the Lauris home page, select Reports and choose LTESS Report. Print report.

1. Log onto the internet and go to https://www.vaDARS.org/essp/DARSeesltess; log in to the ESSP site
2. In the left column, click Requisitions, and then choose View Requisitions

3. Ensure that the Requisition Date is for the month you are reporting, and then click View
4. In the drop down box next to Service Type, select LTESS
5. Next to each customer name, select Edit, then input their information based off of the corresponding LTESS report submitted (production percentage, hours worked, gross wages, days worked)
6. If there were any changes (such as no work, no billing, etc.) write a comment to explain.
7. Using the printout from QuickBooks, input the time billed for the month, then click the TAB button
8. When the monetary amount billed is shown, select Save, and then move down the list to the next customer
9. When all customer information has been input, scroll to the bottom of the page and select Save and Close
10. Select the Preview button, and then enter the Number of Operating Days for the Month
11. Scroll to the bottom of the page and check the box certifying that the information is accurate, then select the Submit button.
12. Log out
13. When the requisition has been approved, an email will be sent. Following approval, log back into the site, select the requisition, and select Preview
Scroll to the bottom of the page, select Print Requisition. Print, then close and log out

Updated 2/2015

2.26. Reimbursements

All documents to be submitted for consideration for reimbursement must be submitted by the first day of the month by 9:00AM (for the previous month) to be considered for reimbursement. If these items are not submitted, a request will be sent to the employee requesting that all items be submitted within 24 hours. If your items are not submitted within the allotted timeframe, you will not be reimbursed without permission from the Executive Director.

Our Employee Expense company policy outlines how we'll reimburse employees for work related expenses. We'll define "work-related expenses" and set a procedure to authorize expenditure.

Scope
This policy applies to all our employees that need to spend money for work-related activities.

Policy Elements
Employee expenses fall under two categories:

1. Expenses that Stand Up will pay directly on behalf of our employees.
2. Expenses that are paid by our employees and are reimbursable.

We will reimburse all reasonable business expenses, after they are approved, in part or in full as the case may be if all documentation/receipts are submitted.

Standard reimbursements for all Stand Up, Inc. employees:
**Refer to your employee manual for current reimbursement rates*

Mileage

- Only paid if tracked accurately
- Reimbursed monthly
- Submit your monthly mileage log on the 1st day of the month following the month you are requesting reimbursement for to have your reimbursement included in the same pay period.
- Your mileage log may be submitted up to 30 days after the 1st deadline, but any mileage not submitted by this deadline will not be reimbursed.

Cell phone
PT and FT are reimbursed at the rates outlined in your employee handbook. The reimbursement is automatic, there is no need to submit and documentation.

Official Records
Any official records requested by Stand Up such as your driving record or background check.

Business travel
Typically, if you are asked to travel outside of your normal work area the Stand Up office will arrange your accommodations and any necessary tickets or

reservations to the training, conference or class you will be attending. If for any reason you are asked to pay for these directly, document your expenses by keeping all receipts and submitting them to SUI's Executive Assistant for approval.
**While traveling for Stand Up, you will not be reimbursed for any cost accrued by a non-Stand Up employee or personal purchases not related to Stand Up business.*

Meals while traveling for company business:
If your business travel requires that you provide your own meals, you will be reimbursed up to the daily limit of $50.00 per day for overnight trips with proper documentation.
**Per Diem will not be paid where other meal arrangements are offered such as a breakfast or luncheon provided by the conference or training you are attending.*

Office supplies:
Due to the distance between our home office and many employees work location, office supplies may be reimbursable. Office supplies will be reimbursed if you have contacted the home office and they are unable to arrange for delivery of the needed supplies within your timeframe.
Any office supplies that you submit for reimbursement must be accompanied by receipts.
Whenever possible, Stand Up will purchase your needed supplies and have them delivered to you asap. If you have not requested approval ahead of time or you do not submit receipts, you will not be reimbursed.

Employee, customer or employer gifts:
From time to time a special occasion may warrant a gift as a Thank you or Congratulations. Any gift should be under $20.00 per person and requires prior approval. Examples of these gifts may be a supervisor providing a gift card or a token of appreciation to their employees, students or an employer. Request approval from your direct supervisor and submit receipts to the Executive Assistant.

What Stand Up will not reimburse:
- Unauthorized upgrades for travel or accommodations.

- Fines or tickets you receive while driving a business or personal vehicle
- Personal services such as spas, salon etc.
- Personal travel insurance
- Personal reading materials
- Childcare
- Toiletries, cosmetics, or grooming products
- Expenses incurred by spouses, children, or relatives
- In-room movies or video games
- Sporting activities, shows, etc.
- Any unauthorized or undocumented expenses.
- Clothing or attire needed on a specific job site such as non-slip shoes.
- Cleaning or alterations to your clothes

*This list is not exhaustive, please contact your supervisor before making any purchases that may be questionable.
**If for any reason you feel that you need assistance with any items on this list due to unforeseen circumstances, please contact Kelly Reichard for an exception.

We want everyone at Stand Up to have the materials they need as well as any accommodations you may require to feel comfortable while traveling. If for any reason you feel that the restrictions put in place by this policy will limit your ability to conduct your work please reach out to Reichard, we may be able to arrange an exception or pay advance to assist you.

Updated 6/2019

2.27 Medicaid Funding

Before an individual begins utilizing Waiver funding to pay for services, it must be documented that there is no funding available from other sources. Medicaid is always the payer of last resort. This means that individuals must exhaust or not be eligible for funding from other sources.

If the individual is receiving services or is eligible for Supported Employment services through Department of Aging and Rehabilitative Services (DARS) or similar Vocational Rehab (VR) agency, their VR counselor and Community Service Board (CSB) case manager must coordinate the ending or transfer of funding from one agency to the next. Director of SE will assist with the process so that the appropriate request for hours through Medicaid Waiver can be submitted in a timely manner to ensure there is no lapse in services. A letter (or other documentation) confirming that VR funding has ended or will end must be set to Stand Up Inc. to be placed in the individual's file.

If the individual is receiving funding through the schools and it is written in their IEP, the individual must then be referred to their local DARS or applicable VR agency when school funding ends. Waiver funding cannot begin without going through the applicable VR agency first. Once VR funding is exhausted or unable to be used based on state funding, then Medicaid Waiver funding can be utilized. A letter confirming this must be kept in the individual's file. A letter (or other documentation) confirming that VR funding has ended or will end must be set to Stand Up Inc. to be placed in the individual's file.

Updated 04/2015

2.28 Remaining in compliance with laws and regulations as an ESO

Each department head will review laws and regulations related to their department periodically to ensure SUI and SUI staff are in compliance with the most up to date regulations for each department. If an update in policy or practices is required, the department head will submit supporting documentation to the ED which outlines the changes made and whether or not any changes is policy or procedures are required. These updates will be maintained in the annual review file. Stand Up also maintains membership in APSE and ACCESS and DBHDS listserv to assist in remaining up to date regarding laws and regulations.

Updated 06/2017

2.29 Vendor Approval

As an ESO in Virginia, SUI is not required to have any licensures, other then what is outlined below. The following is a breakdown of the requirements to serve as an ESO in Virginia for DARS and DMAS.

DARS – Stand Up must maintain CARF accreditation and be approved as a vendor for any services paid for by DARS

DMAS/DBHBS – Stand Up must maintain CARF accreditation and be an approved DARS vendor.

Updated 06/2012

2.30 Corporation status

Stand Up is a S Corporation. Stand Up's corporation status in managed by SUI's lawyer. Issues and annual updates and reporting are handled collaboratively by the lawyer and SUI president.

Updated 6/2012

2.31 Employment Practices

SUI is committed to fair employment practices, including the prohibition against all forms of illegal discrimination. By providing equal access and fair treatment to all employees on the basis of merit, we improve success while enhancing the progress of individuals and the communities where our businesses are located.

SUI is committed to observing all applicable labor and employment laws wherever we operate. That includes observing those laws that pertain to freedom of association, privacy, the prohibition of forced, compulsory and child labor, and those laws that pertain to the elimination of any improper employment discrimination.

Requirements:

• Use merit, qualifications (for example, education, experience, or competencies) and other job-related criteria as the sole bases for all employment-related decisions affecting employees and applicants.
• Strictly observe all applicable labor and employment laws, including those relating to freedom of association; privacy; the right of employees to engage in collective bargaining; forced, compulsory and child labor; and non-discrimination.
• Recruit, hire, train, compensate, promote and provide other conditions of employment without regard to a person's race, color, religion, national origin, sex (including pregnancy), sexual orientation, age, disability, veteran status or other characteristic protected by law. Discrimination on any of these bases is prohibited.
• Provide a work environment free of harassment, such as harassment directed at a person because of his or her race, religion, sex, etc.
• Respect the privacy rights of employees by using, maintaining and transferring their personal data in accordance with applicable Company guidelines and procedures.

Updated 6/2012

2.32 Requests for information from ESO

Stand Up provides information to stakeholders through our website, www.standup-inc.com, through quarterly newsletters, brochures, and opportunities for service fairs and presentations throughout the communities we serve. Questions regarding Stand Up services are to be directed to the Executive Director.

3. Customer Services

3.1. Program Acceptance

1. A customer is referred to Stand Up by DARS, CSB, school systems or by private individual.
2. Generally, all customers are accepted into Stand Up's programs on the condition that they meet Stand Up's hourly rate. STEP program participants are chosen identified by school personnel or DARS (depending on program) for program participation.
3. Occasionally, it is necessary to determine if a customer that has previously worked with this agency will be eligible to receive services again. In this case the customer is scheduled to meet with the President and the previous Stand Up job coach. A decision will be made regarding program acceptance by the President.
4. Stand UP reserves the right to close services on any customer.
5. If you are refused services by Stand Up, you will be informed in writing to the reasoning why services were declined. You will be referred to another agency that may able to further assist you.
6. If you are refused services by Stand Up and wish that Stand Up inform your family/support system why services were refused, SUI will inform any guardian and/or any person with a signed release of information form as to why services were refused in writing. Stand Up will also inform the funding source as applicable.
7. If a wait list is necessary due to service capacity, customers will be placed on the list in order of referral date. As coaches become available, customers will move into service status by referral date.

<u>Referral Process</u>

CSB to DARS

1) Meeting or Presentation with customer and supports

2) Complete Referral Form
    a. Release of Information for CSB, DARS
3) Email referral form to DARS and cc: Director of Supported Employment
4) Application received from DARS
5) Application completed then submitted to DARS by SUI or case manager
6) If DARS categories are closed, there is no longer a need for documentation from DARS for services. Individual may begin services under DD Waiver.

Updated 7/2018

3.2. Potential Customers

1. DARS or hiring agency notifies Stand Up of potential customers seeking services.
2. Stand Up contacts potential customers to make a presentation of services
3. Customer then will choose for themselves if Stand Up is the vendor that they wish to assist them.
4. If Stand Up is chosen by the potential customers for assistance in their job search a status code is assigned to them as applicable.
5. Authorizations are then provided by the counselor or funding source.

Created 8/2009

3.3. New Customers

1. DARS, Case Managers, School Systems or the hiring agency notifies Stand Up of potential customers seeking services.
2. Stand Up contacts potential customers to make a presentation of services available as requested.
3. A service code and authorization for services is provided from the hiring agency and maintained in the customer's file.
4. A new customer intake is conducted. Services are overviewed with customers, if different services are desired that aren't authorized SUI staff

will provide information to the customer regarding gaining services (referral to DARS, CSB or private pay options)

5. All new customers will be reported to the Executive Director and applicable Department Head.

Updated 6/2014

3.4. Intakes

1. New customer information is provided to the applicable supervisor for the service being provided.
2. When applicable, the supervisor assigns the customer a Stand Up staff member as their primary service provider.
3. The job coach reviews the customer information and schedules an appointment for an intake.
4. The Stand Up staff member meets with the new customer, providing transportation if needed.
5. During this meeting, the Stand Up staff member provides an orientation to the customer utilizing the customer manual.
6. The job coach gathers information from the customer and any supports present and then completes the following paperwork:

    a. Intake
    b. Mock Application
    c. Person Centered Plan
    d. Customer rights
    e. Social service release form(optional)
    f. Voter registration(optional)
    g. Consent to release information
    h. Consent of photograph
    i. Background check consent form
    j. Emergency data
    k. Medication Use profile
    l. Needs/risk assessment
    m. Signature form

n. Voluntary disclosure form
o. The work ethic form is reviewed
p. Interview questions
q. Medicaid required information as listed below:
   a. MR/ID Waiver:
      i. Individualized Service Plan (ISP)
      ii. Level of Functioning (LOF) and SIS
      iii. Functional Assessment (must be completed if individual does not have SIS)
      iv. Customer Choice form
      v. Any psychological evaluations that the Case Manager had in the file
      vi. Preauthorization Request (PA) from DMAS
   b. DD Waiver
      i. Case Manager POC (Plan of Care)
      ii. Current Level of Functioning (LOF) and SIS
      iii. Social Assessment
      iv. Choice of Provider form
      v. Any psychological evaluations that the Case Manager had in the file

7. The job coach gathers information from the customer and any supports present and completes the following paperwork:
   a. Intake
   b. Mock application
   c. Person centered plan
   d. Social service release
   e. Voter registration form
   f. Consent to release information
   g. Customer rights
   h. Signature form
   i. Medication history
   j. Customer medical condition
   k. Allergy form

l. The work ethics form is reviewed

m. Medicaid required information as listed below:

DD Waiver:

Individualized Service Plan (ISP)

SIS or VIDES

Functional Assessment (must be completed if individual does not have SIS or VIDES)

Customer Choice or Provider Form

Service Authorization

Risk Assessment

Psychological Evaluation (if completed for customer)

n. Provides referral sheet to customer

o. Voluntary disclosure form

p. Background Check

8. JC then provides the intake to the appropriate Department Head.
9. The intake is then reviewed for completion and then processed in Lauris Online. If the intake is incomplete, it will be returned to the applicable Stand Up staff member for completion.

Updated 01/2015

3.5. Confidentiality

1. All staff are trained upon hire regarding the confidential nature of Stand Up business and how to protect the confidential information with which they have access.
2. All files are kept in a locked cabinet. These files are not to be removed from the office at any time. If an employee removes a file from any cabinet, the file must be returned by the end of the business day.
3. Customers sign release of information forms. These forms detail with whom Stand Up can share information. These forms are valid for a period of one calendar year. Any information shared with parties listed on the release of

information form is discussed with the customer to identify what information is able to be shared. This is documented in the customer's case notes.

4. If a party is not listed on the customer release form, any specific information regarding this customer may not be provided. Stand Up staff must retrieve approval in writing from the customer before sharing any information with an individual, business or agency not listed on the release of information form.
5. Regarding employers, Stand Up staff shall not reveal any information regarding the customer's disability or case history without the written approval of the customer.
6. If an employee has a question regarding confidentiality, they should see their direct supervisor or Human Resources for further clarification.
7. Mock applications, which are used to complete applications, are allowed to be copied and taken out of the Stand Up offices. This form must stay with the STAND UP staff member and cannot be left in an unlocked car or residence.
8. Computers that maintain confidential information are password protected and have virus and spy ware protection.
9. Video recording, audio recording and photographs or customers are not permitted without the completed consent from the customer and/or guardians as applicable.

Updated 03/2016

3.6. Grievances

Grievances or complaints are defined as any issue that has not been resolved by communicating with their direct service staff or their direct supervisor or direct supervisor for any employee. Any customer, employee or stakeholder can retrieve a grievance form by request at the home office. Grievance forms may also by mailed, faxed, comments may be left at standup-inc.com or may be emailed by request. The President will review the grievance, research the claim and decide upon a resolution, which will be provided in writing within 30 days. When necessary, the President may meet with others in Stand Up leadership for further discussion and/or investigation. Should the customer disagree with the decision, he/she may also discuss the issue with their funding source who may further assist them. Employees who have a grievance or a complaint should follow the same procedure, first reaching out to their direct supervisor to aid in resolution of any grievances. Grievances will be directly addressed by the President within a thirty day period and an appropriate solution agreed upon and provided to you in writing within 30 days. Any grievance brought to Stand Up will not result in retaliation or barriers to services provided. If you would like an advocate to assist you in the grievance procedure, SUI will provide information to you regarding advocate options. The results of any grievance may be appealed, in writing, within thirty days of the result findings. Grievances will be reviewed annually to determine trends or if any policy changes are required in order to maintain a high level of service provision.

Updated 8/2017

3.7. Matching Customers to Coaches

Stand Up makes every attempt to connect each customer with the job coach that will be the best match for them, helping them to achieve the success and independence that they are working toward. SUI considers all factors of a customer's case and addresses the following:

1. Customer background: are there specific reasons they should work with a member of the same sex?

2. Customer preference: does the customer have preferences for which job coach to work with, based on age, sex, experience or from prior acquaintance with the JC?

3. Areas of expertise: if a customer is looking for a specific job or training, they are placed with a JC who has experience in that area. For example, if a

customer needs CNA training, they will be placed with a coach who has contacts and experience in that field.

4. Area of disability: if a job coach has more knowledge/experience in certain areas of disability, SUI tries to match the customer with that job coach. For example, if a customer is Deaf, they will work with a job coach who is fluent in sign language.

5. Personality: SUI understands that some personalities just get along better than others. Job coaches and customers will be matched to help bring out the best of the customer's qualities to ensure their long-term success in employment.

Created 8/2009

3.8. Website

Stand Up utilized as website so that our stakeholders may receive information in any easy and accessible manner. Information is available regarding our services, staff and organization. Stakeholders may also inquire regarding services, CARF, survey reports, quality and effectiveness of services, descriptions of services and persons served. All questions will be receiving a response from Stand Up staff within five business days.

Created 1/2010

3.9. Behavior Management/Positive Interventions

Stand Up employees will often have the duty of attempting to redirect or assist customers in having a more positive, effective attitude while receiving services. Stand Up employees do not use any restrictive force or any behaviors that may cause injury to our customers. Stand Up employees are not to engage physically with any customer. Stand Up employees are not to utilize seclusion or restraints when dealing with a SUI customer.

Stand Up staff will be trained upon hire and regularly thereafter in the benefits of positive interventions, relationship building, redirection and de-escalation and how this technique can benefit employees, customers and employers. Stand Up staff are trained to assess the situation and work to identify triggers and supports help customers make positive choices while at work or receiving services within the community.

Updated 05/2017

3.10. LTESS; Long term follow along services

Stand Up, Inc. utilizes Long Term Employment Support Services (LTESS) funding, under the jurisdiction of DARS, to provide follow along services to those customers who have reached stability on their job site. ‘Stability’ is determined when the customer has reached a production, quality and independence level of at least 80%, and upon consultation with both the counselor and customer. When this point is reached, a customer then enters into follow along services. LTESS funding is limited, therefore if that funding should be utilized before the end of the fiscal year, SUI then provides non-billable follow along services to these individuals for the remainder of that fiscal year.

To ensure the success of those customers in follow along services, SUI has a system in place to document their progress, stability and/or any issues that may arise. All customers are required to have a minimum of a phone call once per month for 2 months, and a required on-site visit every third month (this may be changed if the customer has been in the program for over one year and is approved for bi-monthly contacts) This system ensures that both the customer and employer have consistent contact with a job coach should a need or an issue arise during the course of employment.

If a customer has a work-related issue that needs prolonged attention, or should they learn a new task that may require the assistance of a job coach, they may qualify for post-employment services. Should a situation such as one of these become evident, the job coach is to contact the DARS counselor assigned to that customer’s case to explain the situation and request post-employment hours to work with that customer. These hours will be utilized for 1 to 3 months, on average, to address the situation and ensure that the customer is back to a consistent, stable work environment and production level.

Created 8/2008

3.11. Social Networks

Social network connections between SUI employees and customers that are 18 years of age or under are prohibited. If you believe you need to be connected online to a customer under the age of 18 for communication purposes, you must have written permission from the Executive Director. Failure to comply with this policy may result in corrective action, including termination.

Social media accounts owned by Stand Up, are maintained only by SUI administrative staff. Posts and responses are monitored daily by SUI owners to ensure post are in line with SUI values and are deemed appropriate. No new accounts on behalf of Stand Up may be created without the knowledge and consent of SUI ownership.

Updated 11/13/2017

3.12. JSST

Funding Source:

DARS:

1. Upon receiving a referral from DARS, give referral information to the Director of transition services.
2. Customer's name will be put on a waiting list for the JSST course (minimum of 3 customers per course).
3. Transition DH will notify the job coach who will be the instructor for the course.
4. Transition DH will contact customers on the waiting list and let them know the dates the course will be running through. Transition DH will also contact DARS to let them know when the course is scheduled to begin.
5. Instructor will need to meet with each customer individually and complete an entire intake packet before the course begins.
6. DARS work adjustment will be held 3 day a week, 2 hours a day for 10 ten weeks with a minimum for 3 customers per class).
7. Paperwork:

Case note: The instructor will need to complete a case note for each student after class to include date, professional time, a note explaining what topics were covered in the course of the day, how the customer behaved, prompts given, etc.

RFA: Completed by the 20th of every month to cover the hours needed for the time in the class next month. For the month directly following the end of the course, request JD hours to begin the job search with the customer.

Reports: Completed and turned in on the last day of the month to the Transition DH by 5:00pm.

8. Timesheets are due every Monday morning by 9am.

DD Wavier:

1. Upon receiving a customer who has DD wavier please give information to both the Transition DH and to Medicaid DH.
2. Transition DH will place customer either onto waiting list for work adjustment training or assign the customer a job coach who will be the instructor.
3. Transition DH will check with DARS to see if the customer currently has services from DARS. If the customer does have services through DARS then DARS will need to fund before Medicaid waiver. If they do not have DARS services, the Transition DH will need to get a letter from DARS stating this and place the letter in their file.
4. Medicaid DH will begin the paperwork to being work adjustment approval.
5. Upon receiving the appropriate paperwork back, Medicaid DH will notify the Transition DH. The Transition DH will then contact the Instructor who will need to meet with the customer individually and complete an entire intake packet before the course begins.
6. Paperwork

   Case notes: Due by 5:00pm on the 5th of each month

Reports: Due quarterly and are based on the ISP dates as listed in the customer's file

7. Timesheets are due every Monday morning by 9am.

ID Wavier:

1. Upon receiving a customer who has ID wavier please give information to both the Transition DH and to Medicaid DH.
2. Medicaid DH will need the following information from the case manager DMAS 225, Social Assessment, Provider Choice Form, Approved Plan of Care or the case manager's DMAS 457 if you cannot get a copy of the POC, and their yearly LOF, other assessments and any other formal assessment (psychological, functional, etc.)
3. Transition DH will place customer either onto waiting list for work adjustment training or assign the customer employment specialist who will be the instructor.
4. Employment specialist will need to take online course: Staff Orientation Training
   To Mental Retardation Services before they are able to provide prevocational services to ID wavier customers.
5. Transition DH will check with DARS to see if the customer currently has services from DARS. If the customer does have services through DARS then DARS will need to fund before Medicaid waiver. If they do not have DARS services, the Transition DH will need to get a letter from DARS stating this and place the letter in their file.
6. Medicaid DH will begin the paperwork to being work adjustment approval.
7. The instructor for the course will complete an online course needed for all employees who will be working with customers with the ID wavier in the work adjustment program.
8. Upon receiving the appropriate paperwork back, Medicaid DH will notify the Transition DH. The Transition DH will then contact the Instructor who will

need to meet with the customer individually and complete an entire intake packet before the course begins.

9. Paperwork

    Case notes: Due by the 5:00pm on the 5^{th} of each month

    Reports: Due quarterly and are based on the ISP dates as listed in the customer's file

10. Timesheets are due every Monday morning by 9am.

Updated 5/2015

3.13. ISAR's

ISARs (Individual Service Authorization Requests) are submitted to Case Managers to request hours/units for working with individuals under the ID/MR Waiver. The ISAR must be submitted no less than two weeks before beginning services with the customer (it can take up to a month before receiving an approved ISAR back). You cannot begin services without an approved ISAR as the Department of Medical Assistance Services (DMAS) does not authorize back payments.

1. To start the process, go to DELTA webpage on Department of Behavioral health and Developmental Service (DBHDS). Once their log in using the username and password.
2. Click on Individual Disability Online Service (IDOLS)
3. You must select a service from the top left – hand box. It should either be to initiate a waiver service or to change the procedure code. If you are initiating waiver services, you must select the first box labeled as "Initiate Waiver Services" and select "Add a service". If you are changing the service code, then you will select the box labeled "Service Modification" and then select the box labeled "Procedure Code Modification".
4. If you are changing the service code (i.e. moving an individual from individual Waiver statue to Group Waiver) you submit two ISARs. One ISAR will be submitted to end the initial authorization and the second will be to begin the new service code.
5. Provider name and provider email address should be filled in by the person submitting the request. The provider number is already filled in on the form for you.

6. The “Start Date” and the “End Date” should be filled in as the date that you would like to request to start. This is usually listed as two weeks after the date you submit the ISAR as that is normal turn around rate for receiving an approved ISAR as that is the normal turn around rate for receiving an approved ISAR back is two weeks. For example, if you receive the fax from the case manager on 1/11/15, then the start date listed on the ISAR would be 1/13/15, unless the case manager requests otherwise. The “End Date” is the ISP yearly end date.
7. Select the service to be provided; H2023 for Individual Waiver Supports or H2024 for Group Waiver Supports. If you select H2023 then you will list how many hours a week the individual works. If you select H2024, then the unit’s selected will be reflected in block units no hours worked.
8. Fill in the “Reason for this request” section to explain what the hours or units will be used for.
9. In the blocks sections where you select the allowable activities that are included in the PFS, you will mark an “x” beside all of the activities that pertain to your request.
10. The next block asks if the documentations that the Supported Employment Services cannot be obtained from the school system of from DARS. You must place an “x” beside yes or no.
11. In the weekly chart, you must list the total number of hours the individual works each day.
12. In the comment section under the weekly schedule, you can list the actual time spent working each shift. For example, if you listed 4 hours for Monday in the chart, in the comments sections you can state that the individual works Monday 9am-1pm.

Updated 1/2015

3.14. Customer Contact

During job development services, the job coach must have a face to face meeting with the customer either to complete or submit an application twice a month, at minimum. JC must have weekly contact with each customer actively receiving services. The team approach, between job coach and customer, to job development is important to SUI. This time allows the JC to learn the strengths and weaknesses of a customer, get to know the customer’s wants and goals and facilitates a good working relationship for when the customer gains employment.

Created 05/2012

3.15. Cultural Competency and Diversity Plan

Stand Up, Inc. recognizes that all persons served, company personnel and all stakeholders comprise a culturally diverse group of individuals. To ensure the highest quality service delivery, the following plan will be adhered to in order to best meet the needs of each individual we serve.

1) All company staff will receive trainings in cultural awareness and diversity, at minimum, once per quarter. These trainings will include discussion of respect and awareness in the areas of culture, age, gender, sexual orientation, spiritual beliefs, socioeconomic status and language.
2) Staff will complete training and education forms in accordance with each of these trainings, and will document what was learned, and how it may affect their service delivery.
3) All SUI staff will participate in a community activity each year, to further develop local cultural awareness and increase relevance in service delivery.
4) At initial intake, each employment specialist will provide a voluntary survey to each person served, asking questions concerning preferences in any of the above listed areas.
5) Each stakeholder survey will include question(s) addressing areas of cultural diversity and preferences for that individual stakeholder.

This plan will be reviewed annually to ensure compliance and relevance to populations served. The plan will be updated as needed to ensure best practices in service delivery.

Reviewed 2/2018

3.16. Record Keeping

Stand Up values the confidentiality and security of all records, both administrative and records of persons served. In order to protect the privacy of employees and customers, the following procedures are adhered to:

1) For administrative and employee records, see policy 1.17.
2) Customer records will remain password protected within our EHS.
3) Employees that have copies of records in their possession must take precautions to protect the confidentiality and security of these records. Records are not to be left unattended, in areas that aren't protected by locks or visible to anyone that is not an employee of SUI or on the customer's release forms. Copies of forms must be shredded when use is completed.
4) All case notes must be updated as outlined as directed by your department heads. Deadlines differ by department. See your DH for more specific guidelines.
5) Incident and/or accident reports must be completed and submitted within 24 hours of the incident and/or accident.
6) Physical files for closed customers with paper files will be removed from the filing room following their official closure from SUI. Closed files will be retained for seven years. Closed files will be moved to an offsite location for secure storage.

Updated 02/2017

3.17. Crisis Intervention

If intervention is required in order to stabilize a customer during a time of need, employees should utilize several resources available: Emergency contact listed in intake, Customer Medical Information form which indicates medical care preferences, resource list, and the PCP. Utilizing these tools, the coach may identify what works best for the customer and their individual needs when crisis supports are required.

Created 05/2011

4. Health and Safety

Prevention, reporting and remedial action

Stand Up values the health and safety of each stakeholder. Please familiarize yourself with each of these regulations carefully. In the event of an occurrence of one of the following events, please contact the Executive Director immediately for further instructions or guidelines as needed.

Stand Up reviews these policies with every new employee upon hire and continues safety training at regular intervals throughout employment to ensure knowledge of SUI procedures and to provide the safest environment possible for those we serve. If you have any concerns regarding the health and safety of Stand Up, please contact the Executive Director. SUI is always striving to make our environment safe for every customer, employee and visitor in our offices and while working in the field.

Reporting:
If a SUI employee or customer is involved in any of the items listed below, please report immediately to your immediate supervisor and/or the Executive Director so that SUI can address any issues as required by the policies listed below. If any of the following items occur, an incident report must be completed within 24 hours of the incident.

Remedial Action:
Incident reports will be reviewed on an annual basis by the Executive Director to identify any trends, problems and to ensure that our policies remain effective and relevant.

4.1. Emergency Procedures

A. Fire

If a fire is discovered in the building and is small enough to fight, go immediately to the nearest extinguisher.
Always aim at the base of the fire.
Remember PASS: Pull, Aim, Squeeze, Sweep

B. Bomb Threats

The bomb threat caller is the best source of information regarding the bomb. When a bomb threat is called in:

- Keep the caller on the line as long as possible. Ask him or her to repeat the message. Record every word spoken by the caller.
- If the caller does not indicate the location of the bomb or the time of detonation, ask him or her for this information
- Inform the caller that the building is occupied, and the detonation of a bomb could result in death or serious injury to many innocent people
- Pay particular attention to background noises, such as motors running, music playing and any other noise which may give a clue as to the location of the caller
- Listen closely to the voice (male, female), voice quality (calm, excited), accents, and speech impediments. Immediately after the caller hangs up, report the threat to the safety team.
- Report the information immediately to the police department and then to the President.
- Evacuate the building and proceed to the safety meeting point located in the front of the building at the sign.
- Remain available, as law enforcement personnel will want to interview you.

C. Natural Disasters

The following natural disasters are the disasters deemed most likely for our locale by the history of our service area:

Tornados, Hurricanes (or Tropical Storms) and Severe Thunderstorms with high winds

- Close outer windows
- Move employees to hallway
- Lie face down and cover your head

Earthquakes

- Go outside, if possible
- If you are unable to go outside, stand in a doorway or in an area that is clear of furniture and other objects

D. Utility Failure

- For power outage, call AEP 1-800-956-4237
- For water failure, call local Water Co. 847-1322

E. Medical Emergencies and Incidents involving Injuries

If the injured or ill individual needs immediate medical attention, call 911 for emergency assistance. Give the name of the injured party, your name, location of injured party and the symptoms noted of the injured party.

If a customer is injured and requires a Doctor's attention, call their emergency contact or 911 for transport. Do not transport and injured or ill customer.

As soon as you are able, secure the injured person's emergency contact information located in either their customer or personnel file and inform the party of the medical emergency.

When the injured party is safe, and their emergency contact has been notified, notify the Executive Director so that you may complete a report as appropriate.

F. Violent or Threatening Situations

Employees should avoid the situation if at all possible. If the situation does not involve the employee or a customer, the employee should gather any customers present and retreat to a safe location. If appropriate, the employee should call 911. When the employee and customers are in a safe location, the employee should immediately contact their direct supervisor and Human Resources.

If the violent or threatening situation is initiated by a customer:

- Diffuse the situation if possible
- If the situation is escalated, try to keep the aggressor calm
- Call 911 if the situation becomes threatening
- If the situation occurs on a job site, inform the site's management or human resource department
- Contact your direct supervisor as soon as possible
- If the police are called, cooperate fully. However, remember that much of the information we have regarding our customers is confidential. Refer questions regarding confidential information to your supervisor.
- If a customer displays aggression towards you, whether physical or verbal, you are not required to tolerate the behavior. Often, walking away and

giving the customer a break will help to resolve the situation. If needed, call your supervisor so that another job coach may aid the customer.

G. Abuse of a Stand Up employee

Abuse of any kind is not tolerated by Stand Up. If a Stand Up employee feels that their personal rights (including verbal, physical or sexual abuse) have been violated by any Stand Up employee, customer or other stakeholders immediately report the occurrence to the HR department. A report will be taken and provided to Stand Up's President. The President will meet will all involved parties and form a resolution to the occurrence within fourteen business days.

H. Employee injury

If an employee of Stand Up is injured while on the job, please report the injury to Human Resources as soon as possible so that the injury may be addressed and covered by Stand Up's Worker's Compensation.

I. In case of hostage/violent situation at the office-

- If someone comes into the office threatening violence, you have two objectives: Be compliant with them, and send the distress signal via text. If you are at the office during such an event, remain as calm as possible.
- If you are at the office during such an event, remain as calm as possible.
- Distress signal via text will simply be an x. The x will symbolize there is a serious/life-threatening event happening at the office.
- Send the x to anyone on SUI staff discretely and quickly as possible as to not draw attention to yourself using your phone. Make note that the reason there is no particular point person is due to the fact that we want this to take as little time as possible.
- If you are the person receiving the text, it is your responsibility to contact law enforcement. You will tell them you received a message Stating there is a life threatening incident happening at our office. Try to memorize the address. After calling law enforcement, it will be your responsibility to begin the phone chain informing everyone to stay away from the building.

- Cancel any meetings you may have scheduled at the office until you are informed it is safe

Updated 02/2013

4.2. Evacuations

When to evacuate:

Evacuation should occur when there is an immediate threat to individuals in the building.

Complete evacuation from the physical facility:

1. All individuals should walk calmly to the front of the building and cross to the other side of the street.
2. Once outside, HR will conduct a head count to ensure everyone is out of the building safely.

Safety of evacuees:

1. All individuals evacuating should report to the front of the building, across the street.
2. Individuals show not leave until HR has cleared that the threat has subsided.

Accounting for all persons involved:

Due to the nature of the business, Stand Up has individuals coming in and out of the office at all hours of the business day.

1. Employees should let someone know when they leave so that it is known who is present at the office.
2. Once the building is evacuated, HR will perform a head count of the evacuees, keeping in mind who was present at the office at the time of the evacuation.

Sheltering in place:

Stand Up utilizes the city and county emergency contact alerts to notify when sheltering in place is appropriate, and for other safety guidance. SUI administrative staff pass this information along to staff through email and/or text as appropriate to their working locations.

Temporary Shelter:

If temporary shelter is required, employees should report to Dan Richard’s home at 3705 Otter Place Lynchburg, VA 24503

Identification of essential services:

Essential services are usually conducted outside of the building.

Continuation of essential services:

Essential services can continue in the field in the event of an emergency in regard to service provision. For administrative items such as payroll, a backup of QuickBooks and needed information and equipment is stored off site in case of an emergency within our administrative office.

Emergency phone numbers:

1. 911 first, if necessary
2. Dan Reichard, President, 434-546-0682 or Kelly Reichard, Executive Director, 434-660-1823

Notification of appropriate emergency authorities

In an emergency where help is required, dial 911. 911 will dispatch the appropriate authorities.

Drills:

All SUI staff will participate in a drill to practice the evacuation and other safety procedures on, at minimum, once a year. These trainings will be recorded and kept in each employee’s file or in the health and safety manual as appropriate.

Updated 05/2017

4.3. Critical Incidents

A. Prevention

All Stand Up staff will be trained to look for potential threats or situations that may cause and emergency situation.

B. Reporting and Documentation

Human Resources should be notified as soon as possible of the incident occurrence. A detailed and factual report regarding the critical incident that includes the date, time, the incident, location, who was involved, description of the incident, witnesses, who was called, outcome, and if procedure were followed will be completed by the employee that witnessed the incident, filed and stored in the home office. Report will be reviewed by the Executive Director for evaluation and shall also evaluate if further staff training should occur. An annual report will also occur to review all incidents and determine if further action and/or training is required to prevent incidents in the future.

C. Remedial Action and Debriefings

1. Stand Up will hold a debriefing following all critical incidents within thirty days of the incident. All involved parties will be invited to attend the debriefing and the executive director will attend in order to identify and address and issues or changes to procedure that may be required. A report will be generated from this debriefing to identify any additional procedure trainings or changes that may be required.
2. Human Resources will review the actions taken during and following the incident.
3. If policy changes need to occur, HR will change procedures and forward to all Stand Up employees.
4. Stand Up employees will be trained on new procedures.

D. Medication errors

1. At no time will Stand Up staff provide medication to customers.
2. If a medication error is suspected in either staff or customers, their emergency contact should be contacted immediately.

E. Communicable disease

1. When a customer or an employee has a communicable disease they should seek immediate medical attention.

2. In order to return to work, a doctor's note must be provided to HR stating that treatment has been provided.
3. Staff will be trained in the use of masks, gloves and other protective equipment on an annual basis.

F. Infection control and prevention

1. Hand washing is the single most effective means of preventing disease. An effective hand wash lasts between 10-15 seconds.
2. Treat everyone's blood and body fluids as infectious.
3. Wear gloves when touching blood, body fluids, mucous membranes, or broken skin of anyone.
4. Do not pick up broken glass directly.
5. If accidental blood/body fluid exposure occurs, clean wound with soap and water, flush the eye, mouth or nose with running water. Notify your supervisor.
6. Staff should assist customers in learning safe behaviors in regard to infection control and prevention, by modeling and reinforcing the customer employer's safety procedures.

G. Violence or aggression

Refer to policy 4.1(f)

H. Sentinel events

1. 911 should be called immediately if you are the first on the scene.
2. Notify the President
3. A report of the incident will be written to include all information.
4. Report will be kept both in the customer's file and with HR

I. Use or possession of weapons

1. Use or possession of weapons is not allowed on Stand Up property or in the field conducting business.
2. Weapons include, but are not limited to, handguns, knives and explosives.
3. Stand Up employees may carry pepper spray for protection while in the field.

4. Possession of a weapon will result in disciplinary action and/or termination.
5. Employees will discuss and train customers regarding their employers' procedures regarding weapons in the customer's place of employment.

J. Wandering or Elopement
1. If a Stand Up customer wanders off and it is known that they are unable to care for themselves, Stand Up employees should search the immediate grounds of the facilities.
2. If the customer has not been found, the employee should contact the local authorities.
3. Whenever a customer leaves your care unexpectedly and is under the care of a guardian or caregiver, the employee should immediately contact their emergency contact.

K. Vehicular accidents
Refer to section 2.13.
Copies of this policy should also be located in every company and employee's cars.

L. Hazardous accidents
1. Alert others of the accident if possible.
2. Call 911
3. Take direction from local authorities.

Hazardous Materials
Hazardous Materials are to be kept out of common office areas and will be stored properly in 'employee only' portions of the office.

M. Use or possession of licit or illicit substances
1. Smoking is allowed in designated areas only.
2. Use or possession of illicit substances is prohibited.
3. You are not permitted to provide cigarettes to customers.

N. Abuse or neglect
1. Stand Up employees can speak with immediate supervisor.

2. If employee is uncomfortable speaking with their supervisor, they can speak with an HR representative.
3. If the situation is not resolved through these contacts, please contact the President.

O. Suicide or attempted suicide

All staff are responsible for safeguarding the health and safety of customers. All staff are expected to exercise sound professional judgment, err on the side of caution and demonstrate extreme sensitivity throughout any crisis situation. Any staff member who is originally made aware of any threat or witnesses any attempt towards self-harm, that is written, drawn, spoken or threatened, will immediately notify their supervisor. Any threat in any form must be treated as real and dealt with immediately. No customer should be left alone, nor confidences promised. Thus, in cases of life threatening situations a customer confidentiality will be waived.
Suicide Threat Definition – A suicide threat is a verbal or non-verbal communication that the individual intends to harm him/herself with the intention to die but has not acted on the behavior.
a. The above-mentioned staff member will immediately inform their supervisor
b. If applicable, the supervisor will notify the customer's legal guardian
c. The appropriate staff will document the incident, including completing a critical incident form, and gather appropriate supportive documentation from any other SUI staff who witnessed the threat.
e. The supervisor will:

- Contact the parent/guardian, if applicable, apprise them of the situation and make recommendations.
- Put all recommendations in writing to the parent/guardian/caregiver if applicable.
- If the customer does not have a legal guardian or caregiver, the job coach should call 911 and notify them of the situation

- Do not drive the customer in personal vehicles. Do not leave the customer alone at any time.

Updated 01/2016

P. Sexual Assault

Sexual assault, including rape, occurs when a person is forced or coerced physically, verbally or by deception into any type of sexual conduct or contact with another person whether the assailant is a friend, acquaintance or stranger. Victims of rape or a sexual assault are encouraged to contact the local police. If the assault involves the actions of a SUI employee, SUI's grievance procedure will also be followed.

Q. The safety of our customers

On the PCP page, there is a section to identify any health and safety needs for our customers. Please complete this upon intake and continue to review the safety needs of customers during the PCP quarterly review. If needed, please attach a more specific outline in regard to how the safety needs of our customers may be addressed. If you need more instruction regarding this procedure or how to assist your customer work as safely as possible, please see your immediate supervisor for assistance.

R. Seclusion and/or Restraints

Stand Up employees do not use any restrictive force or any behaviors that may cause injury to our customers. Stand Up employees are not to engage physically with any customer. Stand Up employees are not to utilize seclusion or restraints when dealing with a SUI customer.

S. Injury of customers

Stand Up employees will be trained in First aid/CPR. If a customer needs first aid, trained staff may assist. If the customer needs more than basic first aid, an ambulance will be called to take the customer to the Emergency Room for further medical attention. In this case, someone from the customer's family, group home, or your emergency contact will be called to meet them at the hospital.

Updated 02/2015

4.4. Initial and Annual competency based training

A. All employees will receive first aid training

B. Identification of unsafe environmental factors

1. When possible, schedule customers to come to the office for paperwork tasks such as intakes.
2. If a customer cannot come to the office, it is allowable for a job coach to bring another employee with them to the customer's home.
3. Always review a customer's file, especially the customer's history provided by their funder, to review for any possible safety threats. Criminal histories, violent actions or unstable behavior should be noted, and extra safety precautions should be taken. Training will occur periodically during staff trainings and upon hire to assist in identifying potential threats.
4. If you feel unsafe working with a customer, please speak to your direct supervisor for guidance or transfer of case if necessary.
6. All employees will experience training in best practices concerning verbal interventions throughout their employment with Stand Up, both upon hire and throughout employment during staff meetings.
7. For customers, staff will address any health or safety needs in the PCP where prompted. If a plan of action is needed, a narrative describing the customer's particular needs and how those needs can be addressed will be attached.
8. Records of trainings will be kept in each employee's file or the health and safety manual as appropriate.
9. Upon completion of trainings, a training and education form documenting mock drills will be completed as well as any testing

given and kept in the employee's file along with a survey regarding the training.
10. Safety knowledge and trainings will be addressed in each employee's annual review.

Updated 05/2012

4.5. Emergency Contact Information

1. For customers: Each customer provides emergency contact information along with applicable medical history upon hire. In case of an emergency, each job coach should keep an updated list of their customers' (initials only) along with their emergency contacts, doctor's information, allergies as well as any needed medical information with them. This can be in the form of note cards, or a folder containing this information, or is accessible on Lauris. Job coaches should have this information accessible at any time in case of an emergency. The job coach is responsible for keeping this list updated and accurate. Direct supervisors will perform spot checks to check for this contact information.
2. For employees: The Executive Director will keep a copy all emergency contact information and medical information provided upon hire outside of the office in case of an emergency in which the staff could not enter the office.
3. Customer emergency information is located in SUI's EHS and is available at all times for staff to support customer.

Updated 01/2017

4.6. Sexual Harassment

Sexual Harassment Policy

Stand Up, Inc. strives to create and maintain a work environment in which people are treated with dignity, decency and respect. The environment of the company should be characterized by mutual trust and the absence of intimidation, oppression and exploitation. Stand Up will not tolerate unlawful discrimination or harassment of any kind. Through enforcement of this policy and by education of employees, Stand Up will seek to prevent, correct and discipline behavior that violates this policy.

All employees, regardless of their positions, are covered by and are expected to comply with this policy and to take appropriate measures to ensure that prohibited conduct does not occur. Appropriate disciplinary action will be taken against any employee who violates this policy. Based on the seriousness of the offense, disciplinary action may include verbal or written reprimand, suspension, or termination of employment.

Managers and supervisors who knowingly allow or tolerate discrimination, harassment or retaliation, including the failure to immediately report such misconduct to human resources (HR), are in violation of this policy and subject to discipline.

Prohibited Conduct Under This Policy

Stand Up, in compliance with all applicable federal, state and local anti-discrimination and harassment laws and regulations, enforces this policy in accordance with the following definitions and guidelines:

Discrimination

It is a violation of Stand Up's policy to discriminate in the provision of employment opportunities, benefits or privileges; to create discriminatory work conditions; or to use discriminatory evaluative standards in employment if the basis of that discriminatory treatment is, in whole or in part, the person's race, color, national origin, age, religion, disability status, sex, sexual orientation, gender identity or expression, genetic information or marital status.

Discrimination of this kind may also be strictly prohibited by a variety of federal, state and local laws, including Title VII of the Civil Rights Act of 1964, the Age Discrimination Act of 1967 and the Americans with Disabilities Act of 1990. This policy is intended to comply with the prohibitions stated in these anti-discrimination laws.

Discrimination in violation of this policy will be subject to disciplinary measures up to and including termination.

Harassment

Stand Up prohibits harassment of any kind, including sexual harassment, and will take appropriate and immediate action in response to complaints or knowledge of violations of this policy. For purposes of this policy, harassment is any verbal or physical conduct designed to threaten, intimidate or coerce an employee, co-worker, or any person working for or on behalf of Stand Up.

The following examples of harassment are intended to be guidelines and are not exclusive when determining whether there has been a violation of this policy:

- Verbal harassment includes comments that are offensive or unwelcome regarding a person's national origin, race, color, religion, age, sex, sexual orientation, pregnancy, appearance, disability, gender identity or expression, marital status or other protected status, including epithets, slurs and negative stereotyping.
- Nonverbal harassment includes distribution, display or discussion of any written or graphic material that ridicules, denigrates, insults, belittles or shows hostility, aversion or disrespect toward an individual or group because of national origin, race, color, religion, age, gender, sexual orientation, pregnancy, appearance, disability, sexual identity, marital status or other protected status.

Sexual harassment

Sexual harassment is a form of unlawful employment discrimination under Title VII of the Civil Rights Act of 1964 and is prohibited under Stand Up's anti-harassment policy. According to the Equal Employment Opportunity Commission (EEOC), sexual harassment is defined as "unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature ... when ... submission to or rejection of such conduct is used as the basis for employment decisions ... or such conduct has the purpose or effect of ... creating an intimidating, hostile or offensive working environment."

Sexual harassment occurs when unsolicited and unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature:

- Is made explicitly or implicitly a term or condition of employment.
- Is used as a basis for an employment decision.
- Unreasonably interferes with an employee's work performance or creates an intimidating, hostile or otherwise offensive environment.

Sexual harassment may take different forms. The following examples of sexual harassment are intended to be guidelines and are not exclusive when determining whether there has been a violation of this policy:

- Verbal sexual harassment includes innuendoes, suggestive comments, jokes of a sexual nature, sexual propositions, lewd remarks and threats; requests for any type of sexual favor (this includes repeated, unwelcome requests for dates); and verbal abuse or "kidding" that is oriented toward a prohibitive form of harassment, including that which is sexual in nature and unwelcome.
- Nonverbal sexual harassment includes the distribution, display or discussion of any written or graphic material, including calendars, posters and cartoons that are sexually suggestive or show hostility toward an individual or group because of sex; suggestive or insulting sounds; leering; staring; whistling; obscene

gestures; content in letters, notes, facsimiles, e-mails, photos, text messages, tweets and Internet postings; or other forms of communication that are sexual in nature and offensive.

- Physical sexual harassment includes unwelcome, unwanted physical contact, including touching, tickling, pinching, patting, brushing up against, hugging, cornering, kissing, fondling, and forced sexual intercourse or assault.

Courteous, mutually respectful, pleasant, noncoercive interactions between employees that are appropriate in the workplace and acceptable to and welcomed by both parties are not considered to be harassment, including sexual harassment.

Consensual Romantic or Sexual Relationships

Stand Up strongly discourages romantic or sexual relationships between a manager or other supervisory employee and an employee who reports directly or indirectly to that person, because such relationships tend to create compromising conflicts of interest or the appearance of such conflicts. In addition, such a relationship may give rise to the perception by others that there is favoritism or bias in employment decisions affecting the staff employee. Moreover, given the uneven balance of power within such relationships, consent by the staff member is suspect and may be viewed by others, or at a later date by the staff member, as having been given as the result of coercion or intimidation. The atmosphere created by such appearances of bias, favoritism, intimidation, coercion or exploitation undermines the spirit of trust and mutual respect that is essential to a healthy work environment. If there is such a relationship, the parties need to be aware that one or both may be moved to a different department or other actions may be taken.

If any employee of Stand Up enters into a consensual relationship that is romantic or sexual in nature with an employee who reports directly or indirectly to that employee, or if one of the parties is in a supervisory capacity in the same department in which the other party works, the parties must notify the Executive Director or other appropriate corporate officer. Because of potential issues regarding quid pro quo harassment, Stand Up has made reporting mandatory. This requirement does not apply to employees who do not work in the same department or to parties where neither one supervises or otherwise manages responsibilities over the other.

Once the relationship is made known to Stand Up, the company will review the situation with human resources in light of all the facts (reporting relationship between the parties, effect on co-workers, job titles of the parties, etc.) and will determine whether one or both parties need to be moved to another job or department. If it is determined that one party must be moved, and there are jobs in other departments available for both, the parties may decide who will be the one to apply for a new position. If the parties cannot amicably come to a decision, or the party is not chosen for the position to which he or she applied, the Executive Director and senior management will decide which party will be moved. That decision will be based on which move will be least disruptive to the organization as a whole. If no other jobs are available for either party, the parties will be given the option of terminating their relationship or resigning.

Retaliation

No hardship, loss, benefit or penalty may be imposed on an employee in response to:

- Filing or responding to a bona fide complaint of discrimination or harassment.
- Appearing as a witness in the investigation of a complaint.
- Serving as an investigator of a complaint.

Lodging a bona fide complaint will in no way be used against the employee or have an adverse impact on the individual's employment status. However, filing groundless or malicious complaints is an abuse of this policy and will be treated as a violation.

Any person who is found to have violated this aspect of the policy will be subject to discipline up to and including termination of employment.

Confidentiality

All complaints and investigations are treated confidentially to the extent possible, and information is disclosed strictly on a need-to-know basis. The identity of the complainant is usually revealed to the parties involved during the investigation, and the Executive Director will take adequate steps to ensure that the complainant is protected from retaliation during and after the investigation. All information pertaining to a complaint or investigation under this policy will be maintained in secure files within the HR department.

Complaint procedure

Stand Up has established the following procedure for lodging a complaint of harassment, discrimination or retaliation. The company will treat all aspects of the procedure confidentially to the extent reasonably possible.

1. Complaints should be submitted as soon as possible after an incident has occurred, preferably in writing. The Executive Director may assist the complainant in completing a written statement or, in the event an employee refuses to provide information in writing, the Executive Director will dictate the verbal complaint.

2. Upon receiving a complaint or being advised by a supervisor or manager that violation of this policy may be occurring, the Executive Director will notify senior management and review the complaint with the company's legal counsel.
3. The Executive Director will initiate an investigation to determine whether there is a reasonable basis for believing that the alleged violation of this policy occurred.
4. If necessary, the complainant and the respondent will be separated during the course of the investigation, either through internal transfer or administrative leave.
5. During the investigation, the Executive Director, together with legal counsel or other management employees, will interview the complainant, the respondent and any witnesses to determine whether the alleged conduct occurred.
6. Upon conclusion of an investigation, the Executive Director or other person conducting the investigation will submit a written report of his or her findings to the company. If it is determined that a violation of this policy has occurred, the Executive Director will recommend appropriate disciplinary action. The appropriate action will depend on the following factors:

a) the severity, frequency and pervasiveness of the conduct;
b) prior complaints made by the complainant;
c) prior complaints made against the respondent; and
d) the quality of the evidence (e.g., firsthand knowledge, credible corroboration).
If the investigation is inconclusive or if it is determined that there has been no violation of policy but potentially problematic conduct may have occurred, the Executive Director may recommend appropriate preventive action.

7. Senior management will review the investigative report and any statements submitted by the complainant or respondent, discuss results of the investigation with the Executive Director and other management staff as appropriate, and decide what action, if any, will be taken.
8. Once a final decision is made by senior management, the Executive Director will meet with the complainant and the respondent separately and notify them of the findings of the investigation. If disciplinary action is to be taken, the respondent will be informed of the nature of the discipline and how it will be executed.

Alternative legal remedies

Nothing in this policy may prevent the complainant or the respondent from pursuing formal legal remedies or resolution through local, state or federal agencies or the courts.