



We Value P.E.O.P.L.E.

**WELCOME
TO
LIVING ALTERNATIVES FOR THE DEVELOPMENTALLY DISABLED, INC.
L.A.D.D., INC.**

Welcome to L.A.D.D., Inc. We hope your new job will live up to your expectations and your employment with us will be a rewarding one. If you have been working for us, we wish to express my sincere appreciation for your valued service.

We are pleased to provide you with your Employee Handbook/Code of Conduct, which outlines the employee policies and practices in effect at L.A.D.D., Inc. The Employee Handbook/Code of Conduct is designed to help your association with L.A.D.D., Inc. Also, we encourage you to ask questions of Management and co-workers. By doing so, you will learn your job quickly.

We have set very high standards for you. These are necessary if we are to sustain our growth and achievement in a highly competitive business. At the same time, we are committed to providing challenge, recognition, compensation, and benefits to help you reach your goals and objectives as well as the goals of L.A.D.D., Inc.

We have been providing high quality services since 1978. At L.A.D.D., Inc. we work together as a team to achieve our Mission, Vision, and Values. By following our Mission, Vision and Values you will not only enjoy your interactions with the people at L.A.D.D., Inc. but will find positive outcomes in your personal life as well.

I am confident that the future will be both productive and gratifying for all of us. By working together. . . WE MAKE THE DIFFERENCE!!

Sincerely,

Gloria S. Mitzelfeld
Administrator



We Value P.E.O.P.L.E.

Living Alternatives for the Developmentally Disabled, Inc.

L.A.D.D., Inc.

Providing Community Based Services in
Berrien, Cass, Van Buren, Macomb and Oakland Counties.

MISSION STATEMENT:

We Make the Difference!

VISION:

Always striving to enhance the quality of life for all we serve!

VALUES:

We Value P.E.O.P.L.E.

- People:** see People as a “whole person”, first.
- Environment:** build an Environment of H.O.P.E., trust, and healthy relationships.
- Opportunities:** create Opportunities for growth and making G.O.O.D. decisions.
- Provide:** Provide gentle interactions to show you C.A.R.E.
- Learn:** Learn to appreciate differences in a team and treat all people with dignity and respect.
- Empower:** Empower by using S.O.U.L. and positive, open communication.



The Commission on Accreditation of Rehabilitation Facilities.

L.A.D.D., Inc. is accredited by CARF since 1998: An internationally recognized, not-for-profit accrediting body that promotes quality, value, and optimal outcomes of services through an accreditation process centering on enhancing the lives of the people served.

MISSION, VISION, AND VALUES

The Mission, Vision and Values of L.A.D.D., Inc. are the foundation and culture of our organization. They are the philosophy and ethics that guide us in our delivery of services and in all of our interactions with the people we serve, their families/legal representatives, our co-workers/employees, regulatory agencies, and the community as a whole; everyone is our customer. Each and every person employed by L.A.D.D., Inc. must make a commitment to follow our Mission, Vision, and Values while at work; it is part of our job requirements to be employed here at L.A.D.D., Inc. Additionally, following our Mission, Vision, and Values can help us to personally grow as positive, caring, and compassionate individuals in our own families and community. We are all here to make a positive difference in each others lives!!

MISSION

WE MAKE THE DIFFERENCE!

In everything we say and do, our goal is to “make the difference” in people’s lives; a positive difference! Our mission defines the “why” of “Why are we here?”to **Make the Difference**; a positive difference in people’s lives!

VISION

ALWAYS STRIVING TO ENHANCE THE QUALITY OF LIFE FOR ALL WE SERVE!

We continuously work towards creating opportunities for meaningful and positive life experiences for everyone.

VALUES

PEOPLE: SEE PEOPLE AS A “WHOLE PERSON”, FIRST.

We will see people as a “whole person”-- intellectually, physically, and emotionally (mind, body and spirit connection). People will always come first and foremost; we are here to support PEOPLE. We will see all people as “who they are as a person” along with their abilities and strengths. We will focus on strengths and how we can help build upon them. We will use language that does not label or demean people. We will use the Person Centered Planning process to assist people in making informed choices for their future. We will focus on the person and involve them in making informed choices that are meaningful and reflect their individual identity and give them control of their own lives.

ENVIRONMENT: BUILD AN ENVIRONMENT OF H.O.P.E., TRUST, AND HEALTHY RELATIONSHIPS.

We will build a culture and environment of gentleness and **H.O.P.E.** – **H**aving **O**nly **P**ositive **E**xpectations. These positive expectations are for the people and ourselves which will also help us to develop caring, trusting, healthy relationships between the person served, ourselves/employees, significant others in our lives and the community as a whole. Our environment starts within and expands to our immediate surroundings and then even into the community. We will insure each person we serve feels “cared for and valued” much like an extended family that we are all a part together.

OPPORTUNITIES: CREATE OPPORTUNITIES FOR GROWTH AND MAKING G.O.O.D. DECISIONS.

We will support the people we serve in achieving the outcomes they desire. Our goal is to offer the highest level of support services and provide the widest range of meaningful life and growth opportunities. We will provide all people with opportunities to develop their abilities feel a part of and be a contributing citizen of their community. We want people to be able to express what they really want for their lives, feel in control of their lives, help them to achieve their goals, and learn to make **G.O.O.D.** decisions--**G**oal, **O**ptions, **O**utcomes, **D**ecision. Teaching people to choose a Goal, look at all their Options, weigh each Outcome, and make the Decision that is the best for themselves.

PROVIDE: PROVIDE GENTLE INTERACTIONS TO SHOW YOU C.A.R.E.

We will engage in warm, gentle interactions with people. We will use gentleness in our touch, actions, words, and wisdom. We support the culture of gentleness and the philosophy of Gentle Teaching by John McGee to help people feel safe, engaged, loved and loving/valued. We show we CARE by using **C**ompassion, **A**ffirmations, **R**elationships and **E**mpathy to establish a feeling of companionship. Kindness and compassion are core competencies for all employees. Using affirmations (positive feedback) helps to build self-esteem. Healthy, trusting relationships are important to create meaningful life opportunities. Empathy is used to really understand the needs of the people we serve and what they really want or are trying to express. We need to show we **C.A.R.E.**!

LEARN: LEARN TO APPRECIATE DIFFERENCES IN A TEAM AND TREAT ALL PEOPLE WITH DIGNITY AND RESPECT.

Each and every person deserves to be treated with dignity and respect; communication is vital to this process. What we say and how we say it, including our tone of voice and body language, demonstrates dignity and respect. We truly believe that all people are equally important and have different strengths that must be appreciated. We work together as a team and appreciate the strengths that each of us brings to the team. Our strengths and differences are what make each and every one of us unique and interesting as well as helps us each to expand our ideas, the way we think, the way we look at things. We respect each others perspectives and know that **TOGETHER-We Make The Difference!**

EMPOWER: EMPOWER BY USING S.O.U.L. AND POSITIVE, OPEN COMMUNICATION

We will empower ourselves and others by using our S.O.U.L.: **S**top-take a deep breath; **O**pen-your mind/body to all possible solutions, notice your ‘gut’ reaction, are you aligning with our values of P.E.O.P.L.E.; **U**nderstand-those values, the situation, the other person; and **L**ink- to the best part of you; your compassion, kindness, caring, all that is good. Then move forward with your words and actions; using our values of P.E.O.P.L.E. to guide you in the right direction. We are responsible to maintain open, honest, and positive communication with everyone. Each of us is responsible to Stand In Truth and communicate with a positive intent. Using your **S.O.U.L.** to follow our Mission, Vision, and Values empowers us each individually and together as a successful team; **Making The Difference** in all we say and do!!

Table of Contents

WELCOME	1
<i>We Value P.E.O.P.L.E.</i>	2
MISSION STATEMENT:	2
We Make the Difference!	2
VISION:	2
Always striving to enhance the quality of life for all we serve!	2
VALUES:	2
We Value P.E.O.P.L.E.	2
MISSION, VISION, AND VALUES	3
MISSION	3
VISION	3
VALUES	3
INTRODUCTION	8
WAIVER OF PERSONNEL POLICIES AND PROCEDURES	8
AT WILL STATUS OF EMPLOYMENT	8
STANDARDS OF CONDUCT	10
EMPLOYEE HONESTY AND INTEGRITY- STAND IN TRUTH	10
CORPORATE COMPLIANCE	10
EMPLOYEE HANDBOOK /CODE OF CONDUCT	10
ETHICS.....	10
COMPLIANCE:	11
STANDARDS FOR EXCELLENCE	11
CORPORATE COMPLIANCE OFFICER (CCO)	11
THE ROLE OF LEADERSHIP	11
COMMUNICATION/PREVENTION	12
COMPLAINT REPORTING PROCEDURE.....	12
INVESTIGATING ALLEGATIONS	13
RISK ASSESSMENT.....	14
RETRIBUTION	14
PERSONAL BEHAVIOR	14
BUSINESS PRACTICES	14
MARKETING PRACTICE.....	15
CLINICAL PRACTICES	15
INFORMATION MANAGEMENT	15
EMPLOYEE RIGHTS AND RESPONSIBILITIES	15
TRAINING & REVIEW PROCEDURE.....	15
CREATING A CULTURE OF GENTLENESS	16
LANGUAGE	17
INDEPENDENCE AND PRIVACY	18
CRISIS MANAGEMENT AND PROACTIVE INTERVENTION	19
PERSON CENTERED PLANNING	19
RIGHTS OF THE PEOPLE RECEIVING SUPPORT SERVICES	20

ABUSE AND MISTREATMENT	21
DEFINITIONS	21
ABUSE REPORTING.....	22
MENU PLANNING AND FOOD PURCHASING	23
RECREATION	23
<i>EMPLOYEE COMMUNICATION</i>	<i>24</i>
HIPAA SECURITY AND ELECTRONIC COMMUNICATIONS	24
CONFIDENTIALITY/HIPAA	26
<i>POLICIES AND PROCEDURES</i>	<i>27</i>
EQUAL EMPLOYMENT OPPORTUNITY STATEMENT.....	27
WHISTLEBLOWERS POLICY.....	27
MANAGEMENT RIGHTS	27
GENERAL RULES	28
HARASSMENT POLICY.....	29
DRUG POLICY	30
STAFFING POLICY	31
STAFFING REQUIREMENTS	31
EMPLOYEE EVALUATIONS.....	32
QUALIFICATIONS.....	32
IMMIGRATION REFORM AND CONTROL ACT OF 1986.....	32
NEW HIRE ACT	33
PERSONNEL/EMPLOYEE FILE.....	33
CONTENTS OF FILE	33
PERSONNEL RECORDS.....	33
EMPLOYEE ACCESS TO FILE.....	33
DEFINITIONS OF EMPLOYMENT STATUS.....	34
JOB DESCRIPTION.....	34
PROMOTIONS	34
EMPLOYEE REFERRAL BONUS	34
RESIGNATION	34
FINAL PAY CHECKS	35
REDUCTION IN WORKFORCE.....	35
CONFLICT OF INTEREST.....	35
SOCIAL SECURITY PRIVACY POLICY.....	35
<i>COMPENSATION AND PERFORMANCE</i>	<i>36</i>
WAGES	36
TIME KEEPING.....	36
STANDARD TIMEKEEPING.....	36

TELEPUNCH TIMEKEEPING	37
SCHEDULED HOURS.....	37
ATTENDANCE	37
LEAVE OF ABSENCE	37
MILITARY LEAVE.....	37
PAYROLL DEDUCTIONS	38
JURY DUTY.....	38
EMPLOYEE BENEFITS	38
HEALTH INSURANCE.....	38
COBRA.....	39
TAX SHELTERED ANNUITIES AND SUPPLEMENTAL INSURANCE	39
403 B PLAN/TAX SHELTERED ANNUITY PLAN (TSA	39
SUPPLEMENTAL INSURANCE PRODUCTS.....	39
HOLIDAYS	39
MIDNIGHT SHIFTS	39
FLEX-TIME.....	40
VACATION	40
BIRTHDAY PAY	40
DEATH IN THE FAMILY- FUNERAL LEAVE	40
HEALTH AND SAFETY	41
EMPLOYEE HEALTH INFORMATION.....	41
TRAINING	41
WORKPLACE VIOLENCE	42
WORKPLACE HEALTH AND SAFETY.....	42
WORKERS' COMPENSATION AND INJURY	42
ACCIDENT/INJURY.....	42
TRANSPORTATION SERVICES: POLICY FOR EMPLOYEES AND DRIVERS.....	43
GENERAL MAINTENANCE OF PROGRAM	44
EMPLOYMENT EXPECTATIONS.....	44
ACCEPTANCE OF GIFTS AND LOANS	44
SOLICITATION POLICY.....	44
APPROPRIATE CLOTHING.....	45
CELL/TELEPHONE COMMUNICATION POLICY	45
MEDIA RELEASES.....	45
VISITATION	45
INSPECTION OF CONTAINERS AND PACKAGES.....	46

CRIMINAL CONVICTIONS AND CRIMINAL CHARGES	46
VOLUNTEERS.....	46
RELIGION	46
SMOKING.....	46
OUTSIDE EMPLOYMENT	46
SUGGESTIONS	47
MEDICAL RESTRICTIONS	47
FAMILY AND MEDICAL LEAVE OF ABSENCE (FMLA).....	47
BASIC LEAVE ENTITLEMENT	47
MILITARY FAMILY LEAVE ENTITLEMENTS	47
BENEFITS AND PROTECTIONS	48
ELIGIBILITY REQUIREMENTS	48
USE OF LEAVE	48
EMPLOYEE RESPONSIBILITIES	49
EMPLOYER RESPONSIBILITIES	49
<i>FACILITY AND MISCELLANEOUS</i>	<i>49</i>
REVIEW OF LICENSING RULES	49
PRE-EMPLOYMENT RELEASE FOR VIDEOTAPING/PICTURE/PHOTOS OF EMPLOYEES DURING EXECUTION OF JOB DESCRIPTION AND RELATED DUTIES	49
EMPLOYEE TRAINING MEETINGS	50
HOUSE KEYS AND IDENTIFICATION CARDS	50
PETTY CASH /EMPLOYEE RESPONSIBILITY OF FUNDS.....	50
CLOSING	50

Additional Revised Policy/Procedure effective 8/8/14 Handbook V1.2

Social Media Policy	50
Tobacco Use Policy	52
HIPAA Security and Safeguard Policy	53

INTRODUCTION

The L.A.D.D., Inc. Employee Handbook/Code of Conduct is based upon our goal to provide high quality support services to vulnerable people. These policies are also based upon our desire to hire and develop qualified employees to meet the Mission, Vision, and Values of this agency.

This Employee Handbook/Code of Conduct, along with any L.A.D.D., Inc. employee policies and procedures distributed by L.A.D.D., Inc., is neither intended to, nor does, bestow any additional employment rights or benefits to L.A.D.D., Inc. employees.

The authority for operating this agency rests with the Board of Directors who acts upon the advice and recommendation of the Administrative Staff/Steering Committee. The Administrative Staff/Steering Committee establishes the policies and procedures for L.A.D.D., Inc. with assistance and approval of the Board of Directors.

Upon employment, all employees will receive a copy of the Employee Handbook/Code of Conduct and acknowledge the receipt by signature. All employees will receive a general Job Description and Job Essentials at the time of hire. Additional job responsibilities and shift duties will be available from Management.

L.A.D.D., Inc. reserves the right to hire, transfer, suspend and separate from employment and take any other disciplinary actions to maintain the efficiency of employees and meet the needs of the people served. L.A.D.D., Inc. also reserves the right to amend these policies and procedures, introduce additional policies and procedures, change job requirements as necessary, as well as provide exceptions to the policies and procedures as they are written. Such amendments, changes and exceptions by L.A.D.D., Inc. need not be made in writing.

An Employee's right to file claims, action or lawsuit arising out of their employment must be brought within 6 months of the event of employment action that is the subject of the claim, action or lawsuit.

WAIVER OF PERSONNEL POLICIES AND PROCEDURES

L.A.D.D., Inc. reserves the right to waive any of the policies and procedures within this Employee Handbook/Code of Conduct.

AT WILL STATUS OF EMPLOYMENT

L.A.D.D., Inc. does not offer tenured or guaranteed employment. Either the Company or the employee can terminate the employment relationship at any time, with or without cause, with or without notice. This is called **Employment At Will**.

This Employment At Will relationship exists regardless of any other written statements or policies contained in this Handbook or any other Company documents or any verbal statement to the contrary.

Employment with L.A.D.D., Inc. is At Will and entered into voluntarily. Employees are free to resign at any time, for any reason, with or without notice. Similarly, L.A.D.D., Inc. is free to conclude the employment relationship at any time, with or without cause or notice. Personnel practices, including the right to hire, transfer, suspend or separate from employment, to relieve employees from duty, and to maintain discipline and efficiency of employees rests **EXCLUSIVELY** with L.A.D.D., Inc. L.A.D.D., Inc. may introduce new administrative methods, job requirements and disciplinary rules.

This Employee Handbook/Code of Conduct is neither an "employment agreement" nor a "contract of employment". It is a resource for L.A.D.D., Inc. to provide a more uniform approach to personnel practices and policies among employees. This Employee Handbook/Code of Conduct includes general rules of conduct, safety regulations, and disciplinary rules. These policies govern unless a new law supersedes particular rules, policies, procedures, etc. contained within this handbook/code of conduct are specifically superseded by law.

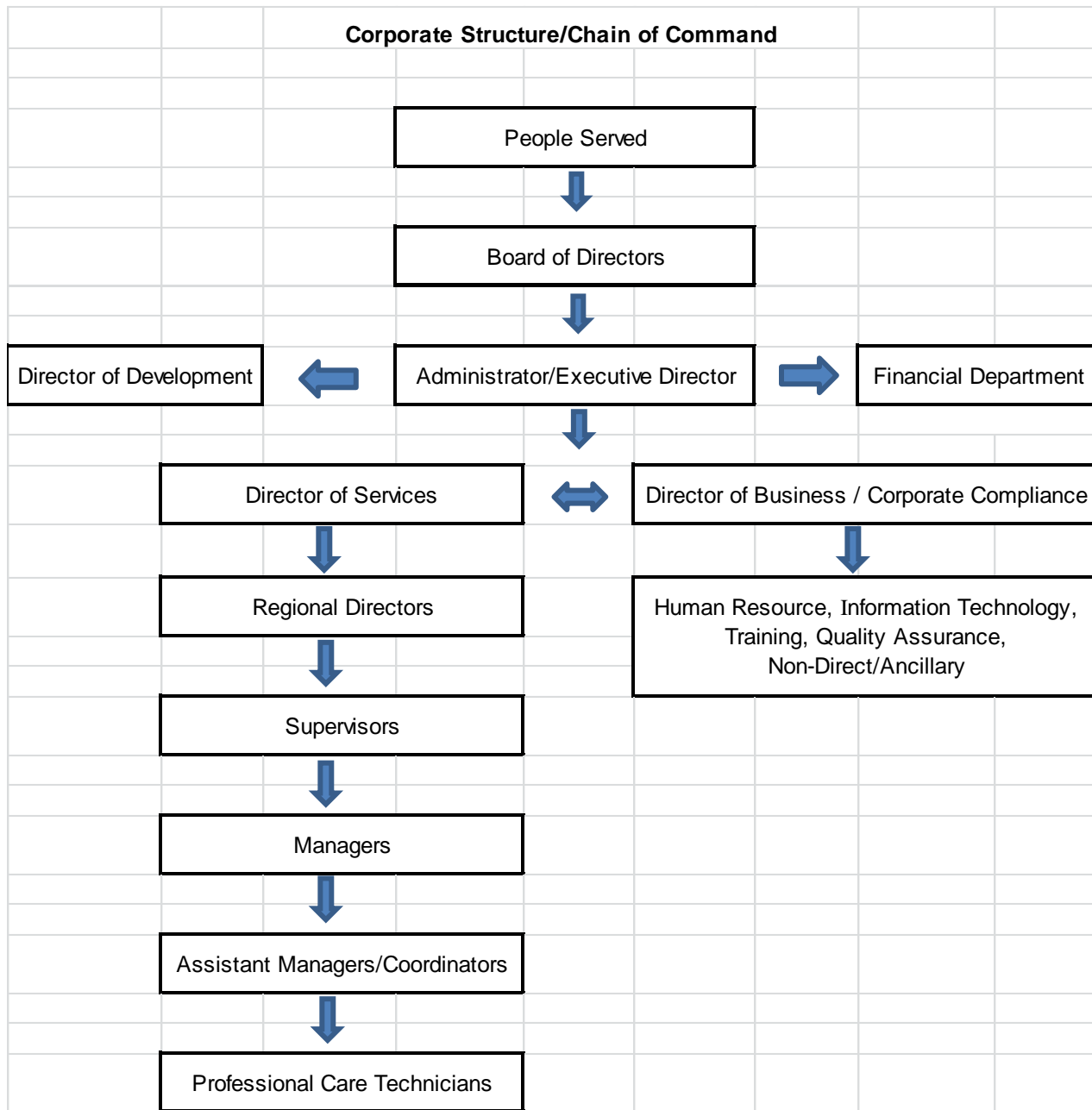
NOTHING in this Employee Handbook/Code of Conduct operates to change an employee's status from At Will to any other status. **All disciplinary** provisions in this Employee Handbook/Code of Conduct are only deemed advisory. L.A.D.D., Inc. expressly reserves the right to separate from employment any employee at its sole discretion.

All employees of L.A.D.D., Inc. are employed with L.A.D.D., Inc. At Will, and nothing contained in this Employee Handbook/Code of Conduct is intended to provide or guarantee employment for any specific period of time. Any representations that change or modify an employee's At Will status must be in writing and signed by the Administrator/CEO of the organization to be enforceable. Any other purported changes in, or modifications to, the At Will nature of the employment relationship, whether oral or in writing are without any effect.

No one has the right to alter this Employee Handbook/Code of Conduct except the Administrator. If an employee feels that they have been told something other than what is in the Employee Handbook/Code of Conduct or contradictory to this, then they need to notify the Administrator.

While L.A.D.D., Inc. may normally attempt to provide advance notice of any change, L.A.D.D., Inc. reserves the right to alter these policies at any time without advance notice. Each program has an L.A.D.D., Inc. Directory that will further clarify and

define the operations of the program. It is important for each employee to be familiar with not only this Employee Handbook/Code of Conduct, but the L.A.D.D., Inc. Directory as well. Any questions concerning the terms or conditions of employment should be referred to Management.



For reporting purposes please use the following Chain of Command:
 Manager (Management)
 Supervisor (Supervisors)
 Regional Director (Supervisors)
 Director of Services/ Director of Business Operations (Administration)
 Administrator/Executive Director
 Board of Directors

STANDARDS OF CONDUCT

EMPLOYEE HONESTY AND INTEGRITY- STAND IN TRUTH

In order to always provide the highest level of services and adhere to the L.A.D.D., Inc. Mission, Vision and Values, employees are expected to be honest and act with integrity. Standing in Truth is a core competency for all L.A.D.D., Inc. employees and Good Moral Character is a job essential requirement to remain employed. Employees are expected to provide high quality care to vulnerable adults and children. In so doing, they must be honest, speak the truth, act and speak with integrity and positive intent. The people we serve rely on employees for their physical and emotional well being. To provide quality care, employees must be honest, and ethical. They must act with kindness and compassion, communicate with positive intent, and immediately correct and report any wrong doing. Employees who observe or are aware of violations of L.A.D.D., Inc. policies or procedures must report them to Management and/or the Corporate Compliance Officer immediately. Employees are required to keep the people we serve safe at all times.

Employees who fail to meet the expectation of honesty and integrity and the core competency requirement of Standing In Truth may be subject to disciplinary action up to and including separation from employment. See Corporate Compliance Plan.

CORPORATE COMPLIANCE

EMPLOYEE HANDBOOK /CODE OF CONDUCT

The Employee Handbook/Code of Conduct can also be called a Code of Ethics. Both reflect L.A.D.D., Inc. Mission, Vision, Values, Ethics, objectives and responsibilities. For the purpose of this manual Code of Conduct hereafter will be referred to as Code.

The policies and procedures set forth in this Employee Handbook/Code of Conduct alone are not intended to serve as an exhaustive treatment of requirements, limitations, or prohibitions on employee conduct and activities established by L.A.D.D., Inc. Rather, they are intended to:

1. Alert Employees to some of the more sensitive and often problematic matters involved in conduct and ethics;
2. Specify, where possible, actions and inactions that are contrary to and that conflict with the duties and responsibilities, and
3. Guide employees in conducting themselves and their affairs in a manner that reflects standards of behavior and professionalism as required by L.A.D.D. Inc. employees.

Additional guidance on matters of conduct is provided in regard to specific policies, procedures, and directives disseminated by L.A.D.D., Inc. Management. All employees of L.A.D.D., Inc. are expected to follow an ethical practice which means working and providing care in a way that is honest, legal and respectful of others; and reflects the Mission, Vision and Values of L.A.D.D., Inc.

All employees of L.A.D.D., Inc. are expected to meet this Code of Conduct which includes Corporate Compliance. This means that they are abiding by the law and following L.A.D.D., Inc.'s policies, which are designed to promote ethical behavior.

All employees of L.A.D.D., Inc., are a part of a team who "Makes the Difference" in people's lives! Everyone on this team is expected to strive for the highest quality of services for all we serve!! So when an employee sees something wrong, they need to fix it and make it even better. If you don't know how to fix it, then work with Management to make sure it gets corrected. All employees are required to intervene and then report if they are aware of or see any issues related to health, safety, rights, abuse, or violations of L.A.D.D., Inc. Policies and Procedures or violations of other rules, regulations or laws.

If at any time you are aware of any quality of care, services, or compliance issues regarding the people we serve and/or our employees that have not been immediately corrected by you or Management; you must contact the Corporate Compliance Officer.

Corporate Compliance can be contacted via phone, email, or fax. This information is listed in all locations on the Emergency Procedures/Responsible Person List as well as posted on our website at www.laddinc.net

ETHICS are a set of values and beliefs. Ethical practices mean working and providing care in a way that is honest, legal and respectful of others; and reflects the Mission, Vision and Values of L.A.D.D., Inc.

This Employee Handbook/Code of Conduct will help you decide what to do in many, but not all situations. If an employee is in doubt about the ethical implications of an action, they should seek advice before acting. Additionally, an employee can use the Mission, Vision and Values of L.A.D.D., Inc. along with asking themselves:

Is it Legal? Does it feel right? Will it reflect negatively or positively on me or L.A.D.D., Inc., What would a reasonable person think about this action? Would I be embarrassed if others knew I took this action? Is there an alternative action?

COMPLIANCE: Means abiding by the law and following L.A.D.D., Inc.'s policies, which are designed to promote ethical behavior.

STANDARDS FOR EXCELLENCE

L.A.D.D., Inc. is a non-profit corporation dedicated to making the difference in people's lives. L.A.D.D., Inc. must act ethically when establishing expectations of behavior, character, and conduct; and maintain the distinction between right and wrong, moral duty, and obligation to the community. L.A.D.D., Inc. is accountable for achieving results through improved quality of life.

L.A.D.D., Inc. standards for excellence are based on honesty, integrity, fairness, respect, trust, responsibility, and accountability in operations, governance, human resources, financial management, community supports and fundraising.

L.A.D.D., Inc. provides these to:

1. Establish standards and policies that clearly communicate appropriate ethical and legal behavior.
2. Help prevent fraud, abuse and other unethical practices; and to insure all employees are striving to meet the highest standards of ethical conduct.
3. Provide a process for the people we serve, guardians, employees, employees from other agencies, and community members to discuss or file complaints, grievances, violations, or problems with this organization or its employees, including Management, and to receive careful consideration and a prompt resolution.

It is the policy of L.A.D.D., Inc. that all programs, services or supports provided by L.A.D.D., Inc. are driven by the Mission, Vision and Values of the company; that all employees follow the Mission, Vision, and Values and policies and procedures of L.A.D.D., Inc. including but not limited to the Standards for Excellence and the Code of Conduct / Employee Handbook; and all programs adhere to the rules and regulations of the licensing and contract agencies, the local, state and federal governments and any agencies that have jurisdiction in the operations of the support services.

L.A.D.D., Inc.'s Code of Conduct directs the daily operations and insures our compliance with legal, regulatory, and ethical standards of practice as defined by the L.A.D.D., Inc. Code of Ethics in all our relationships with our colleagues and those we serve. It is expected that awareness of our Code of Conduct will prevent the occurrence of fraudulent, abusive or unethical practices. This Code also guides us in our response to inappropriate or unlawful behavior.

Our Code is built upon our Mission, Vision, and Values and our commitment to the highest possible standards of excellence in practice.

All billing practices and other business/administrative responsibilities are expected to uphold ethical practices.

Practicing ethics within the Corporate Compliance Plan (CCP) means honoring the rights of the people we support and treating people with dignity and respect.

CORPORATE COMPLIANCE OFFICER (CCO): The Corporate Compliance Officer is the individual who assists in ensuring the policies of the organization are carried out properly. Reports regarding incidents of suspected corporate fraud and abuse can be made to Management or directly to the CCO. These reports may be made openly or anonymously; and will not result in retaliation by the organization. Although every effort will be made to maintain the confidentiality regarding the identity of the person making a report, there may be a point in certain instances where that person's identity may become known, or may need to be revealed. An investigation will be conducted based on all reports, and disciplinary action will be applied to individuals for whom fraud and/or abuse can be substantiated. The Complaint Forms are available in all L.A.D.D., Inc. facilities, L.A.D.D., Inc. Directories, and Service Information Packets and Website.

THE ROLE OF LEADERSHIP--The role of the leadership is essential in establishing and maintaining a culture of compliance and ethical conduct. L.A.D.D., Inc. employees in Management and leadership positions are expected to:

1. Serve as examples by modeling the expected behaviors.
2. Create a culture of gentleness in the workplace, which promotes and reinforces ethical behavior and legal practice.
3. Insure that those they supervise have information and are educated regarding applicable laws, regulations, and policies and legal requirements pertinent to their function.
4. Inform all employees they supervise that strict compliance with policies and regulation is a condition of employment and violation will result in disciplinary action up to and including separation.
5. Make available the resources necessary to resolve ethical dilemmas.
6. Encourage the reporting and discussion of concerns related to legal and ethical practice; insure adequate follow up to concerns.
7. Insure that business practices do not compromise ethical behavior or our core values.
8. Members of Management must instruct employees regarding compliance and monitor for compliance. Failure to do so may result in disciplinary action, up to and including separation from employment.

The L.A.D.D., Inc. Code of Conduct/Employee Handbook, the L.A.D.D., Inc. Directory and Administrative/Management Manual contain several policies that provide and deal with corporate and ethical issues. They are designed to help employees understand their rights and responsibilities, to work more efficiently and to behave and provide care in an ethical way. Training will occur regarding each person's role at L.A.D.D., Inc. and compliance with the Corporate Compliance Plan (CCP), the law and the reporting procedure.

The Corporate Compliance Officer's (CCO) number is available during all working hours, as well as a voicemail system and e-mail account. When the CCO or another member of L.A.D.D., Inc. Management receives a call, voicemail or e-mail, they will listen to or read the report, document the report, take an initial statement, ask questions, and document information. An employee may make an anonymous report. An employee reporting anonymously should make arrangements to call back or e-mail the next day so that Management can ask any follow-up questions. Upon receiving a report with respect to matters that Management/CCO believes appropriate, Management/CCO shall contact appropriate employees as necessary to review and develop additional questions.

COMMUNICATION/PREVENTION

1. The opportunity for employees to ask questions and raise concerns is a cornerstone of a successful Corporate Compliance Program. L.A.D.D., Inc. supports open discussion of ethical and legal questions and concerns regarding compliance issues and will not tolerate retaliation against any individual who, in good faith, raises questions or reports suspected violations.
2. The current managed care environment is complex, with many regulations that dictate how L.A.D.D., Inc. must conduct its healthcare business. The purpose of the compliance program is to establish standards and policies that communicate appropriate ethical and legal behavior. It is better for an individual to raise a question than to be concerned about his or her actions or those of a co-worker. It is better to ask a question than to do something wrong.
3. When L.A.D.D., Inc. employees have a question regarding what should be the legal or ethical action, a number of options are available, including the following:
 - a. Communication with his or her immediate Manager.
 - b. If the concern was not addressed by the Manager, or if the concern is regarding the Manager; communication should be with the Supervisor.
 - c. If the concern is not addressed by the Supervisor, communication should be with the Regional Director or continue through the chain of command.
 - d. If the concerns are with billing, personnel regarding data gathering, or reporting, and/or issue regarding quality improvement, internal audits, etc., then communication can be done with the Corporate Compliance Officer. .
 - e. Where anonymity is a concern, talk with the Corporate Compliance Officer.
 - f. Fill out a Confidential Complaint Form.

COMPLAINT REPORTING PROCEDURE

1. The L.A.D.D., Inc. reporting system is designed with confidentiality and anonymity in mind. Callers who wish to remain anonymous may be provided with a date/time and/or numerical identifier. This numeric identifier may be used by the caller to identify him/her if additional information becomes available or further questioning is necessary.
2. If a person/guardian/employee, etc. are aware of any problems whether caused by that employee or by someone else, he or she must report the problem or situation to Management via telephone call, email, face-to-face interview, or completion of a Confidential Complaint Form (available in all programs). CCF can be submitted to a member of management or the Corporate Compliance Officer. Management will insure that the CCP receives the complaint regardless of the nature of the filing.
3. If the person chooses, or if deemed necessary by L.A.D.D., Inc., a meeting will be held with Management to discuss the complaint and attempt a resolution.
4. If a resolution is not found after discussion with Management, then the complainant should refer the complaint to the next higher level of Management using the following corporate structure: Managers, Area Supervisors, Area Directors, Administrator, and Board of Directors. At that time the complainant must provide Management with a written account of the grievance or problem. Management will report on its progress within 5 business days to any written complaint. This process can continue through the Management chain of command. This process should continue through all levels of management until concerns are satisfactory addressed.
5. If all the above steps fail to yield a resolution, a written detailed account of the grievance should be submitted to the CCO by the Complainant for review. The CCO will report on its progress within 7 business days of the submission of the complaint in writing.
6. Provided a resolution has not been found, the final step in the complaint/grievance process is to have the complaint/grievance heard by an impartial Grievance Committee. This committee will consist of three or more people made up of one or more Professional Care Technicians or Management within the Corporation. After the Grievance Committee has heard the grievance, a written account of their findings will be given to the complainant within 14 business days. Recommendations by the Grievance Committee are advisory only.
7. The Quality Assurance Department will keep copies of all written complaints.

8. L.A.D.D., Inc.'s Management and CCO will be responsible for receiving written complaints concerning L.A.D.D., Inc.'s privacy policies and procedures, as well as L.A.D.D., Inc.'s compliance with the HIPAA privacy rule. Written complaints whenever possible should be on the L.A.D.D., Inc. Confidential Complaint Form and may be turned in following the above procedure or mailed to: Attention CCO, 300 Whitney St. Dowagiac, MI 49047. Complaint Forms are available in each location or you may request one from the above address. Anyone may file complaints without penalty or retaliation for filing a complaint. Anyone may also file a HIPAA complaint with the Secretary of Health and Human Services if so desired. The CCO will be responsible for tracking all complaints related to HIPAA.
9. Management has the obligation to conduct a prompt, thorough, and impartial investigation.

INVESTIGATING ALLEGATIONS

1. **RESPONSE**--Upon receiving a written report of a problem under the Corporate Compliance Plan, Management/CCO will take the following response steps as appropriate and complete a Complaint Form for each report received.
 - a. The CCO, in consultation with Administration, shall determine whether the alleged problem or situation is a violation of the L.A.D.D., Inc. CCP, a possible or suspected violation of federal law, or otherwise puts L.A.D.D., Inc. at risk of economic injury or injury to reputation. Thereafter, the CCO shall take action commensurate with the gravity of the allegation to determine if the allegation has a basis in fact; what internal remedial and/or disciplinary action, if any, is warranted; whether the alleged violation must, by law or should by discretion, be reported to the appropriate governmental authorities; and what modifications in the program might help prevent similar future conduct.
 - b. If Management/CCO, in consultation with Administration, concludes that reporting to governmental authorities may be appropriate, then a report should be made to the appropriate governmental authorities.
 - c. Management/CCO shall make modifications to the program, as needed, to help prevent future violations similar to any detected through the reporting system. The CCO shall also report at least annually (and more frequently if warranted) to the Steering Committee/Administrator all allegations of problems, the results of subsequent investigations, any related disciplinary and/or remedial actions taken, and any modifications taken to prevent future problems.

A. DEALING WITH VIOLATORS REMEDIAL ACTION

Remedial actions are intended to correct mistakes and enhance compliance with the Corporate Compliance Plan and state and federal regulations. In most cases, remedial actions are designed to improve the performance of L.A.D.D., Inc. employees. Management will identify the exact nature of and need for remedial action in collaboration with Administration and/or CCO.

1. Upon investigating what appears to be an action or a situation that requires remedial actions, (as a result of negligence or inadvertence) the CCO/Management will clarify policies, review and revise, if necessary, administrative procedures in order to prevent future errors. If remedial action is deemed necessary, the affected individual(s) will be notified, informed of the concerns regarding their performance, and made aware, if applicable, of the right to file a grievance.
2. Behaviors that could require remedial actions might include the following:
 - a. Failure of an individual to understand and carry out required procedures and policies;
 - b. Inappropriate or improper implementation of the L.A.D.D., Inc. Corporate Compliance Plan;
 - c. Ambiguous communication regarding job performance expectations; or
 - d. Negligent behavior.
3. Remedial actions may include:
 - a. The individual(s) will be required to take part in an educational/training program focused on the problem area and/or
 - b. The individual(s) may be reassigned, suspended with or without pay, demoted or subject to other disciplinary action up to and including separation from employment.

B. CORRECTIVE OR DISCIPLINARY ACTIONS

1. Failure to comply with the L.A.D.D., Inc. Corporate Compliance Plan or the laws and/or regulations applicable to federally funded behavioral health care programs, or any program of training, counseling or remedial action which an employee has been required to undertake pursuant to Section A above, may result in discipline up to and including separation from employment or association with L.A.D.D., Inc.
2. In cases of intentional misconduct, repeated violations, or after documented remediation(s) have failed to correct the problem, L.A.D.D., Inc. may initiate corrective or disciplinary actions. The initiation of corrective or disciplinary action by L.A.D.D., Inc. does not preclude or replace any criminal proceedings that may be taken by the appropriate legal authority.
3. L.A.D.D., Inc. employees shall be subject to corrective or disciplinary action under applicable existing L.A.D.D., Inc. personnel policies.
4. Discipline shall apply, to individuals who fail to report known non-compliant conduct, and to those persons involved in the non-compliant conduct. The disciplinary action imposed in the sole discretion of L.A.D.D., Inc. and will depend on the nature, severity, and frequency of the violation and may include one or more of the following:
 - a. Verbal and/or written warnings, followed by a written reprimand;
 - b. Subject to availability, placement of the individual in a different position if the individual is determined to be qualified to perform the essential functions of a different position within the same job classifications;

- c. Reduction in pay;
- d. Suspension;
- e. Termination of employment; or
- f. Other disciplinary action felt to be appropriate for the specific misconduct.

Management reserves the right to impose that discipline which they deem to be appropriate given the nature of the offense involved, the facts and circumstances giving rise to the violation and the past disciplinary history of the employee. The use of progressive discipline or the designation of a specific offense as dischargeable does not prohibit L.A.D.D., Inc. from terminating employment for any or no reason, with or without cause, as L.A.D.D., Inc. may deem to be appropriate. L.A.D.D., Inc. may terminate employment without prior warning or notice. According to the Federal Sentencing Guideline (8A1.2.3.k(5)), L.A.D.D., Inc. provides a reporting system whereby employees and other agents can report, without fear of retribution, suspected criminal conduct by others within the organization.

RISK ASSESSMENT

L.A.D.D., Inc.'s Management team will conduct an annual assessment in the area of Corporate Compliance to identify and monitor high-risk areas for the agency. Identified high-risk areas will be monitored and audited as deemed necessary by L.A.D.D., Inc.'s Steering Committee.

RETRIBUTION

No Reprisal System--All L.A.D.D., Inc. employees are strongly encouraged to report issues, concerns or suspected violations related to L.A.D.D., Inc. programs and services. L.A.D.D., Inc. shall not take disciplinary action against an employee for merely reporting what the employee reasonably believes to be a violation of the Corporate Compliance Plan. However, L.A.D.D., Inc. may take disciplinary action against an employee on several bases related to reporting:

1. An employee will be subject to disciplinary action if L.A.D.D., Inc. concludes that the employee knowingly fabricated, exaggerated, or minimized a report of wrongdoing to either injure someone else or to protect or benefit himself/herself or others.
2. An employee whose report contains admissions of personal wrongdoing/misconduct will not be guaranteed protection from discipline. L.A.D.D., Inc. may give positive weight to self-confession in determining disciplinary action but the extent depends on factors such as whether the employee's conduct was previously known to L.A.D.D., Inc., whether discovery of the conduct was imminent, and whether the confession was complete and truthful and whether the conduct violated people's rights, agency contracts, or other regulations.

PERSONAL BEHAVIOR

Employees are expected to conduct themselves in a professional manner which is respectful to all the people we serve. The Code of Conduct/Employee Handbook specifies areas of expected behavior. These policies outline expectations including but not limited to dress code and appearance, interactions with the people we serve, co-workers, other people and agencies, reporting requirements and confidentiality.

BUSINESS PRACTICES

Employees involved with billing practices and other business/administrative responsibilities are also expected to uphold certain ethical practices. Unethical business practices may include but are not limited to:

1. Unlawful Billing Practices knowingly committed:
 - a. Duplicate billing, or billing more than one claim for the same service
 - b. Using a billing code that gives higher payment rather than the billing code that reflects the actual services provided
2. False Claims knowingly committed:
 - a. Filing claims for services that were not provided
 - b. Filing claims for services that are not medically necessary
3. Kickbacks
 - a. Receiving benefits for promoting certain brands of drugs, or medical equipment
 - b. Receiving gifts or services from residents in exchange for using certain medications and products
4. Unbundling knowingly committed:
 - a. This can happen when separate claims are submitted for services that should be billed together in a single claim
5. Filing Unnecessary Claims with Medicare or Medicaid knowingly committed:
 - a. One of the reasons for developing a CCP is to prevent Medicare and Medicaid fraud. It is illegal to bill Medicare or Medicaid for services that are not reasonable or medically necessary.
6. Business Records and Cost Reports:
 - a. These records must be kept up-to-date and accurate. Falsifying or altering business records or cost/mileage reports is prohibited.
7. Trained Support employees will conduct Quarterly Documentation Verification Reviews of a representative sampling of records of the persons served to document that dates of services provided coincide with billed episodes of care, determine that the bills accurately reflect the services that were provided, and identify necessary corrective action.

MARKETING PRACTICE

All business and administrative practices including marketing of programs and services must be done ethically and legally. This includes the following areas:

1. **Prohibited Referrals:** It is prohibited to refer a person to a particular facility or healthcare provider in exchange for certain benefits.
2. **Joint Ventures:** It is wrong for a healthcare provider to refer people to each other in exchange for certain benefits. This is similar to a kickback.

CLINICAL PRACTICES

Practicing ethics within the Corporate Compliance Plan (CCP) means honoring individuals' rights, and treating them with respect and dignity. A complete listings of rights for the people receiving supports are located in the Employee Handbook/Code of Conduct, and are available in each program, provided to each person and guardian prior to the start of services. A summary of rights are listed below:

1. **Treatment:** Residents have the right to be treated without discrimination of any kind. Discrimination should be reported to the Manager or the CCO.
2. **Confidentiality:** Access to a resident's records should be limited to those individuals involved in his or her care. All aspects of an individual in our care should remain confidential. A Disclosure Authorization is necessary for anyone other than the guardian, billing purposes or treatment team.
3. **Respect:** Care is provided in a way that respects the individual's values, needs and wishes.
4. **Privacy:** All care (examinations, tests, clinical discussions, etc.) is provided in a way that respects the person's dignity at all times.
5. **Advanced Medical Directives:** These include a living will, and/or durable power of attorney for healthcare. People who have advanced directives will have that denoted on the cover of their clinical record; employees should be aware if a person served has an Advanced Directive. Some Contract Agencies may set rules of use of Advanced Directives.
6. **Involvement in Care Decisions:** People have the right to be involved in making decisions about their care. They also have the right to refuse care as coordinated with their guardianship status.
7. **Informed Consent:** People receiving supports are given all the information they need to make informed decisions. This insures they know their treatment options, including benefits, risks, side effects, and costs of each.
8. **Access to information:** People have the right to see their medical records and get information about their diagnosis, condition, treatment and chances for recovery. The L.A.D.D., Inc. Service Information Packet includes a policy on Access to Records with the procedure for a person to access their own clinical records, if a person makes a request to see their records Management should be informed for assistance in following the procedure.

INFORMATION MANAGEMENT

1. Accurate and truthful documentation and management of information is a critical concern of the CCP.
2. Medical Records must not be changed. Records must be complete and accurate and up to date.
3. **Documentation:** All care given to residents must be recorded. An individual's progress should be documented, and all entries should be signed and dated.
4. **Releasing Information:** Information is confidential and should not be given out to unauthorized persons, without guardian approval. Please see the Disclosure Authorizations located in the program.

EMPLOYEE RIGHTS AND RESPONSIBILITIES

Under the Corporate Compliance Plan (CCP), employees have the right to receive education and training regarding their roles within the organization and compliance with the CCP and the law; and the reporting procedure for violations of the CCP. Documentation regarding training will be maintained. Employee responsibilities depending on their position within the organization include:

1. Respect the rights, values and boundaries of all we serve, with consideration of our values and the law.
2. Respect and protect the privacy and confidentiality of all we serve and of those who serve us.
3. Provide quality services in a timely manner to all regardless of age, race, gender, religion, sexual orientation, ethnic background, terminal diagnosis, infectious disease, or ability to pay.
4. Achieve increasing proficiency and expertise in the delivery of care and in organizational performance.
5. Act in accordance with the highest standards of personal and professional integrity, treating others with respect, honesty and fairness.
6. Accurately present the scope of our services, expertise and financial operations to people receiving supports, families, charitable donors and the community.
7. Provide services consistent with L.A.D.D., Inc. Mission, Vision and Values.

TRAINING & REVIEW PROCEDURE

1. All potential employees will receive a copy of the Mission, Vision and Values for the company at the initial interview.

2. A copy of the Code of Conduct / Employee Handbook will be given to all employees at the time of hire and will be available at all locations.
3. The CCP will be reviewed at the time of hire with the New Employee Training Sheet and a copy will be available at each location in the L.A.D.D., Inc. Directory and on the website.
4. Information on Corporate Compliance and Ethics will be given to all people receiving support services, parents and/or guardians in the L.A.D.D., Inc. Information Packet.
5. The CCP will be reviewed with all employees during annual training.
6. The CCP will be reviewed annually with the LADDERS publication, which is received, by all programs/services, guardians/family members, and community members.
7. L.A.D.D., Inc. Administration/Management will enforce the Corporate Compliance/ Code of Ethics and the Standards for Excellence of the corporation with all the employees by utilizing Corporate Compliance Plan and the Code of Conduct / Employee Handbook to strengthen the quality and integrity of services within the company.
8. The Steering Committee will annually review the Corporate Compliance Plan and the Employee Handbook/Code of Conduct with the annual review of Policies and Procedures to insure that all L.A.D.D., Inc. employees are provided with the information they need to act provide ethically high quality services and trained accordingly
9. The Board of Directors will annually review the Corporate Compliance Plan/ when they review the Annual Outcome Management Report.
10. The Quality Assurance Department will monitor for effectiveness of training.
11. Any violations of the Corporate Compliance Plan will be addressed through disciplinary action up to and including separation from employment.
12. Employee violations will be tracked via the Disciplinary Tracking System.

****Corporate Compliance Plan (CCP) is located in all L.A.D.D., Inc. Directories and online at www.laddinc.net****

CREATING A CULTURE OF GENTLENESS

We feel that following our L.A.D.D., Inc. Mission, Vision, and Values while at work (a job requirement); and hopefully also choosing to use them at home, will help employees to make a positive difference in people's lives. The people served often have not had any family or friends who showed them that they are cared for, loved and respected. The culture of gentleness concept begins with the philosophy of Gentle Teaching by John McGee. L.A.D.D., Inc. embraces this philosophy. We expect our employees to build an environment of H.O.P.E., trust, and healthy relationships; H.O.P.E., – Having Only Positive Expectations creates an environment of caring. Employees need to use gentle interactions to show you **C.A.R.E.**

This is done by using:

1. **Compassion,**
2. **Affirmations,**
3. Creating positive **Relationships,**
4. Having **Empathy** for the person.

Employees following the core values of the organization are what create this culture of gentleness. Employees should use S.O.U.L. when working with people served. Using S.O.U.L. will help in finding solutions (**SOULutions**).

Stop – take a deep breath, deep breathing is important to clear your mind so you can think, relieve stress.

Open – your mind and body to all the possible creative solutions, feel if you are aligning with the values, notice a 'gut' reaction.

Understand – that you must value P.E.O.P.L.E.; say the values and know them, understand the situation, understand the person.

Link– to the very best part of yourself; the part of you that is compassionate, kind, caring, empathetic. .

Once you follow this process, your words and actions will align with our values and guide you a workable solution.

Employees are to teach people how to make **G.O.O.D.** decisions. To do this review:

1. The **Goal** that the person is trying to achieve/what do they want?
2. Help them to look at their **Options** to achieve it. Help them answer the question "How can I get what I want?" and for each Option.
3. Examine what is the **Outcome** for each that is chosen; and
4. Help the person to make the best **Decision** now that their outcomes have been considered.

All employees must remember that it is the decision of the person served; they should always feel in control, and employees are to coach and guide them through the process; steering them towards achieving their goal, remembering that each person's safety must be assured at all times. Employees must go back through the process to insure that none of the Options being used result in unsafe or detrimental decisions. Employees are coaching and guiding which will be "Making the Difference" in the lives of people receiving support(s). Using SOUL and the GOOD decision making process can also help you as well as the people served!

Also, unless a structured and approved goal/plan directly states otherwise, the following are rules for interacting with the people we serve:

1. Always invite or ask the person to do something, never tell them.
2. Do not tell someone to stop doing something; instead invite him or her to choose something else.
3. Always praise or ‘affirm’ appropriate behavior and try to be descriptive; for example, “Your hair looks great! You did a nice job combing it.” Use “affirmation” to build their self-esteem; “You’re smart!”, “You are so funny!”, “I love being with you!”
4. Do not refer to a person’s challenging behaviors as a way to praise; for example, do not say, “You haven’t been yelling, that’s really good”. Instead, praise and respond to the appropriate behaviors; “Wow, what great manners you have!”
5. Be sensitive when discussing someone’s challenging behaviors in front of that person; talk with them, not about them. Try to involve the person in the discussion and “teach” a more acceptable behavior.
6. Use positive reinforcement; “you did a great job picking out your clothes today!” Before telling someone that something needs improvement “and your shoes aren’t quite right for the weather today, let’s see if we can find something that will work a little better”.
7. Positive attention should be given to everyone on a regular basis. We must always try to find positive and loving things to say to everyone. Remember that tone of voice and body language say even more than your words; they are important parts of this communication.

As part of Job Essentials, it is important that employees routinely review the values of P.E.O.P.L.E. and demonstrate the tools of Gentle Teaching/Creating that Culture of Gentleness. To illustrate some concrete examples of gentle interactions, please keep in mind the following when asking a person to do something:

1. Ask the person to do the task and reinforce all movements towards it. For example, if a person appears reluctant to perform a task, but looks in that direction, praise him or her for even this action.
2. If the person stops working on the task or begins to look frustrated, do not say anything negative. Attempt to re-engage the person in the task, perhaps by bringing the task to that person if they have walked away. Any involvement should be reinforced and praised, including a pat on the back or a “high five”, etc.
3. Remember that all words and verbal interactions should be calm, positive, soothing and supportive. All physical interaction must be gentle and soft.

Additional information and material on Gentle Teaching principles can be found in the Gentle Teaching Manual located at our on-line Training Website that all employees can access to at any time as well as at the Gentle Teaching International website.

Gentle Teaching is a philosophy developed by John McGee, of involvement and interaction based upon creating an atmosphere in which people feel safe, loved, loving and engaged (he calls the 4 pillars). John McGee defines loved as having a feeling of “I am somebody”. Loving is a feeling of “warmth towards others”. Engaged is doing things together, because it is good to be together; it is companionship. Safe is a feeling that the person trusts you will care for them and never hurt them. The following is a rudimentary outline of Gentle Teaching and describes L.A.D.D., Inc.’s expectations of employee behavior.

Gentle Teaching involves being “in tune” with a person’s needs and is characterized by a welcoming and uplifting attitude, generous spirit, warm smile, caring gaze and kind words. We always strive to evoke a sense of peace. Employees will never allow their demeanor to provoke violence. The central purpose of our presence in the lives of others is to nurture, teach, and sustain the experience of companionship, connectedness and community per Gentle Teaching and the Center for Positive Living Supports. .

Gentle Teaching involves:

1. Substantial increase in our warm interactions.
2. Establish a feeling of companionship.
3. Forming an extended family “culture of life”.
4. Teaching everyone to feel safe, engaged, loved and loving (the 4 pillars).

Gentle Teaching reminds us that:

1. Each human being is made of mind, body and spirit.
2. Personal change comes from within our own hearts.
3. Each of us desires a feeling of “being with” others.
4. Care giving relationships are based upon unconditional love.
5. Community change occurs from the bottom up

LANGUAGE

Language is a very important part of L.A.D.D., Inc.’s approach to making the difference in people’s lives. . People who have disabilities have long been labeled and referred to in demeaning ways. . The language we use can help change this belittling pattern. . In every interaction we have with the people we serve or in regards to them, employees must always remember to use language supporting our values of P.E.O.P.L.E. including treating everyone with dignity and respect and seeing people as ‘people first’. . Throughout this handbook we often must use words to cover generalized areas or information. . Therefore, we want to define below the use of these words and that they are for ‘handbook’ purposes of generalization:

“Programs” – this word is used to generalize all the different types of services and/or service locations that L.A.D.D., Inc. provides such as Community Living Supports, Licensed Residential, Supported Independent Housing, Respite, etc. . Employees must keep in mind that they are often providing services in a person’s home and must remember it is a ‘home’ first and a worksite second.

“Behaviors” – this word is often used to describe a patterned response that some people with disabilities have learned to do when they are angry or upset. . Again, employees must always remember that the people we serve are a person first and foremost. That means that they get angry and upset just like we do. . If we can use the words ‘angry’ or ‘upset’ as much as possible instead of ‘behavior’; it reminds us that we are all people first and have an array of emotions. . We are also responsible to help the person emotionally as well as physically and intellectually (mind, body, spirit); you are serving the whole person.

“Community Outings/Activities” – these words are often used in documentation. Again, we want to remember that the people we serve, just like ourselves, are community members and live in their community. . We all need to be an active participant in our community and a contributing citizen. . We do this through volunteering, shopping locally, attending festivals, etc. We do not say we are going on a ‘community outing’ when we go shopping with our friends, so we need to be conscientious about not using this language with the people we serve. . They are a person FIRST; just like us!

Employees must meet the following expectations:

1. Do not label people. . This includes the use of someone’s particular diagnosis or disability to name them, as in “He’s an MR”, “she’s a wheelchair”, and “he’s ambulatory”. If necessary, we would say, “He has a disability”, “she uses a wheelchair”, and “he can walk”. . This supports the view that each of us is a person first, with our respective disabilities and abilities as only a part of the whole picture.
2. Do not create new language. . Use actual words and phrases with and about the people we serve as people would about other adults. . For example, we do not say that we are “toileting” someone or “transporting” them somewhere. . We say that we are “helping someone in the bathroom” and “driving” them somewhere. .

All employees are here to “Make the Difference” with the people we serve. . How employees speak and interact with the people we serve must have a positive intent and be done with kindness and compassion; showing you **C.A.R.E.** – Compassion, Affirmations, Relationships, and Empathy. . .

This also applies to all on the job communication and interactions. . This means that interacting and communicating with co-workers, management, guardians, professionals, and those in the community as well as with the people served must be done with C.A.R.E., honesty, integrity, positive intent, openness, and kindness. . Using the S.O.U.L. process and reviewing the corporate values before moving forward with positive words/language and actions will help guide employees in providing the highest quality of care to all we serve.

INDEPENDENCE AND PRIVACY

L.A.D.D., Inc. works to provide people with the opportunity to develop their abilities to the fullest extent possible. . In this regard, the people we serve are to be encouraged to do as much for themselves as achievable. . The environment in each service location should always be aimed toward securing a successful and supportive environment for everyone. Employees will teach and assist the people we serve to be as independent as possible and find successes in their level of independence. . Employees will encourage every person receiving supports to achieve their own personal level of independence in every thing they do. . Employees will help them to find satisfaction, meaning, and purpose in all that they achieve. . The people receiving supports are people first just like any other person in the community and want to be treated with respect, kindness and caring. Employees need to see the person as a “whole person” and support them physically, intellectually, and emotionally.

Along with supporting a person’s independence it is important to understand an employee’s responsibility in maintaining privacy and safety. . Employees must be familiar with each person’s served Personal Profile Assessment which will indicate their level of independence and areas that they need assistance. . Based on their Person Centered Plan and their Personal Profile Assessment, employees will insure that;

1. People needing assistance will be dressed either in the bedroom or the bathroom. . When in a program environment they should either be dressed or have on a robe or other covering; people have the right to privacy.
2. Privacy needs to be maintained in bathroom usage with the employee following the PCP and Personal Profile Assessment identified needs for assistance/independence level of supervision; i.e., employee must be in the bathroom at all times if the person is not independent, especially during bathing, with any individual who requires assistance per their plan of service and/or personal profile assessment.
3. Bedroom doors should be shut if a person is dressing or doing anything that anyone would wish to keep private. Always knock before entering a person’s home or even their room in which a door is closed, even if the person cannot tell anyone to come in. .

CRISIS MANAGEMENT AND PROACTIVE INTERVENTION

L.A.D.D., Inc. employees must always be proactive in preventing situations in which a person served may become angry or upset (sometimes called a “challenging behavior”) and may escalate to a point that is dangerous for the person exhibiting the behavior, other people, or property. . A proactive approach to this problem requires that all employees continuously strive to create an atmosphere showing you **C.A.R.E.** in which positive interactions occur consistently and frequently (see Creating a Culture of Gentleness). .

When a person receiving support services shows a behavior that is out of the ordinary for that person, or shows what appear to be the first steps towards becoming upset or angry, employees should attempt to discover what is bothering the person. . People exhibiting challenging behaviors are attempting to communicate and it is our responsibility to try and figure out what they are trying to tell us. . Someone may be communicating a medical condition, unmet needs, discomfort, or distress regarding the environment, etc. When the causes of the challenging behaviors can be identified, employees must attempt to give the person the assistance he or she requires. Always remember that your actions should be demonstrating kindness and compassion.

It is very important that the employee not become upset along with the person served. This is one of those critical times that employees need to use **S.O.U.L.**; **S**top-take a deep breath, **O**pen-to what the person is trying to say, what they need and solutions, **U**nderstand – that you need to follow the core values, understand the situation, what they person may be feeling, and **L**ink- to the best part of yourself; your compassion before choosing your words and actions.

The **S.O.U.L.** process can all be done in a matter of seconds. If the person continues, attempt to comfort the individual, show understanding, and see if the person can be redirected to another activity if we are sure it’s not a physical discomfort they are experiencing. This does not mean removing the person from the room, it means redirecting his or her attention to a productive or enjoyable leisure activity right where he/she is at that time. If redirection still does not stop the escalation of the behavior and the person begins to inflict harm on people or property, employees should remove other people from the area. Carefully continue to attempt positive redirection. You do need to keep the person safe from harm so be mindful of their surroundings; i.e. windows, glass objects, etc.

Employees must follow the behavior plan in place for the individual. If no such plan exists, follow the L.A.D.D., Inc. Crisis Management Guidelines in which employees have been trained and are available in the L.A.D.D., Inc. Directory and Training Website.

Employees should be aware that formal Behavior Plans/Guidelines or Safety/Crisis Plans, when part of a PCP, must be utilized when providing support services. It is important that employees become familiar with these plans, implement them consistently and follow the specific directions of the plan. L.A.D.D., Inc. Management and the RMHA employees will instruct employees in the implementation of these plans. Any questions should be referred to Management. All employees should be aware that failure to implement any formal plans as they are written could result in an issue of abuse or mistreatment. (See Abuse and Mistreatment Policy)

Under no circumstances can any employee ever use any of the following:

1. Punishment.
2. Any form of physical force (other than physical restraint as defined/approved by licensing rules and RMHA).
3. Restraint of a person’s movement through binding or tying.
4. Restraint of a person’s movement through use of medication, paraphernalia, contraptions, material or equipment for the purpose of immobilizing the person.
5. Confinement of a person in an area where egress is prevented (i.e. a bedroom).
6. Restriction of a person in any manner in a closet, bed, box or in a similar manner.
7. Denial or withholding of food, water, clothing, rest or toilet use.
8. Subject a person to mental, emotional, physical or verbal abuse.
9. Make derogatory remarks about the person, members of his/her family or other people involved in the care of that person.
10. Administer electric shock or any such device.
11. Make or imply threats of any kind.
12. Refuse the person entrance to the program.
13. Isolate the person.

PERSON CENTERED PLANNING

Person Centered Planning is required by the Michigan Mental Health Code; it’s the law. Each person receiving support services works on formal goals and objectives as outlined by their Person Centered Plan. This plan outlines interactions for skill acquisition and development. Employees are responsible to assist the people toward their goals and document daily progress. Methodologies explaining how to teach the skill or meet the goal and data sheets on which to document progress are provided to insure consistency. If structured interactions are not completed during a shift, there must be a documented explanation (i.e. the person was ill or visiting family). All informal interactions must also meet the requirements and follow the guidelines of the Person Centered Plan. Failure to do so will result in disciplinary action up to and including separation from employment.

Employees must remember to use specific, descriptive words and refrain from subjective judgments. For example, it is more accurate to say, "John smiled a lot" as opposed to "John was very happy". Progress documents should be signed in ink with a full signature or initials depending on program requirements. All documentation, including electronic is to be kept confidential and must reflect appropriate language. Program documentation cannot be erased. Changes should be made by marking a line through the note and initialing the change.

Documentation may also be done electronically with a password assigned to each employee. If this is the form of documentation, an employee is never to give out their password to another employee. An employee is not allowed to download, save, or copy any documentation, records, etc. of a person served and/or of L.A.D.D., Inc. services. This is all protected and confidential information that is the property of the person served, Responsible Mental Health Agency, and/or L.A.D.D., Inc.

Employees are required to complete annual training in Person Centered Planning to remain employed.

RIGHTS OF THE PEOPLE RECEIVING SUPPORT SERVICES

Employees of L.A.D.D., Inc. are required by their job as well as the law to insure the rights and safety of the people served are maintained at all times as well as report any time their rights have been violated. In addition to the rights, benefits, and privileges guaranteed by other provisions of the law, the state constitution of 1963 and the constitution of the United States a recipient of mental health services shall have the rights guaranteed by the Michigan Mental Health Code unless otherwise restricted by law.

A person served shall receive mental health services suited to his or her condition. Services shall be provided in a safe, sanitary, and humane treatment environment. Services shall be offered in the least restrictive setting that is appropriate and available. A person served has the right to be treated with dignity and respect.

The following is a list of the legal rights of people who are receiving support services:

1. The right of the person/Legal Representative to be informed of their rights under the Mental Health Code.
2. The right to receive a comprehensive physical and mental examination (Annual Physical).
3. The right to an individual written plan of service (Person Centered Plan).
4. The right to be informed of their clinical status and progress.
5. The right to secure the support services of a private physician.
6. The right not to have surgery or electro-convulsive therapy without legal consents.
7. The right to be protected from physical, sexual, or verbal abuse.
8. The right not to be fingerprinted, video recorded or photographed without legal consent.
9. The right to unimpeded, private, and uncensored communication with others through mail, telephone, electronic devices or visits
10. The rights to receive, possess, and use all property, including clothing.
11. The right to easy access to the money in his/her account and to spend or otherwise use the money.
12. The right to free public elementary and secondary education.
13. The right not to be placed in physical restraints.
14. The right not to be placed in seclusion.
15. The right to unrestricted freedom of movement.
16. The right to have a confidential treatment record that will not be opened to the public except with legal consent.
17. The right to private communications with a psychiatrist or psychologist.
18. The right to protection under the Fair Labor Law for work performed.
19. The person's family members have the right to be treated with dignity and respect.

Specific time-limited modifications of one or more of these rights can be made by the legal guardian, in a Person Centered Plan approved by the RMHA or in isolated emergency situations. Full documentation must be made in an Incident Report.

The following is a list of additional rights:

1. The right to be free from discrimination on the basis of race, religion, color, national origin, sex, age, handicap, marital status, and source of payment in the provision of support services and care.
2. The right to exercise his or her constitutional rights, including the right to vote, the right to practice the religion of his or her choice, the right to freedom of movement, the right to freedom of association, the right to freedom of speech/expression including such as choice of literature, music, etc.
3. The right to refuse participation in religious practices.
4. The right to write send and receive uncensored and unopened mail at his or her own expense.
5. The right of reasonable access to a telephone for private communications. Similar access shall be granted for long distance collect calls and calls which otherwise are paid for by the person receiving support services. A licensee may charge the person for long distance and toll telephone calls.
6. The right to voice grievances and present recommendations pertaining to the policies, support services and house rules of the programs, if receiving residential support services, without fear of retaliation. (Refer to posted Complaint/Grievance Policy.)

A complaint form is also posted for their use. Employees will assist the person in filling out the complaint form in whatever way is necessary,

7. The right to associate and have private communications and consultations with his or her physician, attorney, or any other person of his or her choice unless restricted by the legal guardian and/or Plan or Service.
8. The right to participate in the activities of social, religious, and community groups at his or her own discretion.
9. The right to use the services of advocacy agencies and to attend other community services of his or her choice.
10. The right of reasonable access to and use of his or her personal clothing and belongings.
11. The right to have contact with relatives and friends and receive visitors in their home or apartment, if receiving residential support services at a reasonable time. Exceptions shall be covered in the person's assessment plan. Special consideration shall be given to visitors coming from out of town or whose hours of employment warrant deviation from usual visiting hours.
12. The right to employ the services of a physician, psychiatrist, or dentist of his or her choice for obtaining medical, psychiatric, or dental services.
13. The right to refuse treatment and support services, including the taking of medication and to be made aware of the consequences of that refusal.
14. The right to request and receive assistance from the responsible agency in relocating to another living situation.
15. The right of access to his or her room at his or her own discretion.
16. The right to confidentiality of records as stated in section 12(3) of the act.

ABUSE AND MISTREATMENT

DEFINITIONS

EMOTIONAL HARM: Impaired psychological functioning, growth, or development of a significant nature as evidenced by observable, physical symptomatology and as determined by a psychiatrist, a fully or limited licensed psychologist or social worker.

SERIOUS PHYSICAL HARM: Physical damage suffered by a recipient who, at the time of examination by an RN or a physician, is determined to have caused or could have caused death, or is determined to have caused an impairment of bodily function or a permanent disfigurement.

NON-SERIOUS PHYSICAL HARM: Any physical damage suffered by a recipient, which a physician or RN determines could not have caused or contributed to the death of a recipient, the permanent disfigurement of a recipient, or an impairment of his/her bodily function(s).

SEXUAL ABUSE: Sexual contact between a recipient and an employee of a mental health program operated by or under contract, any non-employee providing support services under jurisdiction of the RMHA Board, another recipient, if either recipient is a minor or either does not assent, any other person in a supervisory or administrative position of the facility. Sexual abuse means any of the following:

1. Criminal sexual conduct as defined by section 520b to 520e of 1931 PA 318, being MCL 750.520b to MCL 750.520e involving an employee, volunteer, or agent of a provider and a recipient,
2. Any sexual contact involving an employee, volunteer, or agent of a department operated hospital or center, a facility licensed by the department under section 137 of the act or an adult foster care facility and a recipient,
3. Any sexual contact between an employee, volunteer, or agent of a provider and a recipient for whom the employee, volunteer, or agent provides direct services.

SEXUAL CONTACT: means the intentional touching of the recipient's or employee's intimate parts or the touching of the clothing covering the immediate area of the recipient's or employee's intimate parts, if that intentional touching can reasonably be construed as being for the purpose of sexual arousal or gratification, done for a sexual purpose, or in a sexual manner for:

1. Revenge,
2. To inflict humiliation, or
3. Out of anger.

SEXUAL HARASSMENT: means sexual advances to a recipient, requests for sexual favors from a recipient, or other conduct or communication of a sexual nature toward a recipient.

ABUSE - CLASS I: A non-accidental act, or provocation of another to act, by an employee or volunteer, who caused, or contributed to: death, serious physical harm, or sexual abuse of a recipient.

ABUSE - CLASS II:

1. A non-accidental act, or provocation of another to act, by an employee or volunteer, which caused, or contributed to, non-serious physical harm to a recipient; or
2. The use of unreasonable force on a recipient by an employee or volunteer, with or without apparent harm; or
3. Any action, or provocation of another to act, by an employee or volunteer, which causes, or contributes to, emotional harm to a recipient, or,

4. An action taken on behalf of a recipient, by assuming incompetence, although a Legal Representative has not been appointed or sought, which results in substantial economic, material, or emotional harm to the recipient, or
5. Exploitation of a recipient by an employee, volunteer, or agent of a Provider.

ABUSE - CLASS III: Use of language, or other means of communication, by an employee to degrade, threaten or sexually harass a recipient.

NEGLECT: Non-compliance by an employee with a standard of care required by law, rules, or other policy, which caused injury or exposure to risk to the client.

NEGLECT: CLASS I:

1. Acts of commission or omission by an employee or volunteer which may result from non-compliance with a standard of care or treatment required by law, rules, policies, guidelines, written directives, procedures, or individual plan of service and which causes, or contributes to, serious physical harm to a recipient; or,
2. The failure to report abuse or neglect of a recipient when the abuse or neglect results in death or serious physical harm to the recipient.

NEGLECT - CLASS II:

1. Acts of commission or omission by an employee or volunteer which result from non-compliance with a standard of care or treatment required by law, rules, policies, guidelines, written directives, procedures, or individual plan of service and which causes, or contributes to, non-serious physical harm or emotional harm, to a recipient, or,
2. The failure to report abuse or neglect of a recipient when the abuse or neglect results in non-serious harm to the recipient.

NEGLECT - CLASS III:

1. Acts of commission or omission by an employee or volunteer which result from non-compliance with a standard of care or treatment required by law, rules, policies, guidelines, written directives, procedures, or individual plan of service which either placed or could have placed, a recipient at risk of physical harm or sexual abuse: or,
2. The failure to report abuse or neglect of a recipient when the abuse or neglect places a recipient at risk of serious or non-serious harm.

No individual will be sexually abused, neglected, or mistreated while receiving support from L.A.D.D., Inc. In addition, all individuals will be provided with a safe, sanitary, and humane environment. Denial of this constitutes neglect.

If an employee witnesses, discovers, or is notified of an incident of abuse or neglect involving a person receiving support services that employee must:

1. Protect, comfort, and assure treatment of the men/women, as necessary.
2. Verbally notify designated Management immediately.
3. Insure that this incident is documented on an Incident Report and reported to Management, appropriate Responsible Mental Health Agency (RMHA) Supports Coordinator and/or the Recipient Rights Officer, as well as any other appropriate agencies.
4. A complete IR (Incident Report) must include all information available and procedures followed. This IR must be filed within 24-48 hours of discovery, based on county and program requirements. A copy of the IR will be submitted to ORR, RMHA, Guardian and the AFC Licensing Consultant if applicable.

Any suspected and/or reported acts of abuse or neglect may result in suspension of the employee(s) in question, without pay, pending the investigation.

All reports of suspected abuse or neglect will be investigated, reported to the appropriate agencies, and all other appropriate action will be taken. Please refer to the Mandatory Reporting Requirements posted in the program, office, or on the website.

Failure to report an incident of suspected abuse or neglect will result in disciplinary action. Each substantiated allegation of abuse or neglect will be handled on an individual basis. Substantiated allegations of abuse or neglect will result in disciplinary action up to and including separation from employment.

If the allegation of abuse or neglect is completely unfounded, the employee will be reinstated and paid for actual scheduled hours missed during the investigation.

ABUSE REPORTING

All suspected abuse shall be reported orally and in writing to Management immediately.

1. If employees have reasonable cause to suspect the abuse of a person served, they shall immediately make or cause to be made, an oral report, by telephone or otherwise, of the suspected abuse to the law enforcement agency of the county, or city, in which the abuse is suspected to have occurred.
2. Within 24-48 hours a written report shall be filed with the law enforcement agency and Management.

3. A person who makes the report of abuse will not be dismissed or otherwise penalized for making a report of abuse unless he or she is the cause for the abuse or did not report in a timely manner. The report of abuse shall be confidential and subject to disclosure with only the consent of that person or by judicial process.
4. The report of abuse is not required if the person has knowledge that the incident of suspected abuse has been reported to the appropriate law enforcement agency.

Reports are required for the following areas of abuse to appropriate agencies:

1. Assault
2. Assault and battery
3. Sexual intercourse under pretext of medical treatment
4. Murder
5. Manslaughter
6. Criminal sexual conduct including sexual penetration
7. Criminal sexual contact
8. Assault with intent to commit sexual conduct including penetration

This type of incident must be reported to Management and documented on an Incident Report for reporting to the RMHA and the regulatory agencies. All of the above must be reported by the Licensee to the AFC Licensing Agency or other appropriate governmental agency. L.A.D.D., Inc. will investigate the abuse and take appropriate action.

MENU PLANNING AND FOOD PURCHASING

Menus are available in each licensed residential program and must be followed when preparing meals. Copies of these menus are available for review. Substitutions should be made if a person served makes a request or if the food on the menu is unavailable. A substitution list will be kept in the program. Substitutions must be documented. Food purchasing relating to menus will be supervised by Management.

It is important that the people served are involved in developing a menu, shopping and cooking their own food. Employees need to thoroughly review and follow the guidelines in menu planning (which includes insuring they are nutritionally balanced), shopping, food prep, etc. located in the Menu Book as well as be familiar with and follow any special diets, prep, and equipment needs for the people served.

Meals are to be served family style with employees as active participants. No breaks are to be taken during a mealtime, nor will employees engage in any other activity (i.e., laundry, watching TV, etc.). Employees are expected to prepare meals and snacks along with the people served according to provided recipes and in amounts specified on the menu. Employees religious restrictions involving food preparation or handling, and need for accommodation must be addressed in writing to the Corporate Compliance Officer.

Employees may not make a meal that is different from what is served to the people who live there. Employees choosing to eat something different may bring in their own food to eat. However, this food cannot be eaten in front of the people receiving support unless they have brought enough to share. (This includes snacks, fast food, pop, etc.) They will need to eat after the people served have finished their meal and are relaxing.

RECREATION

Employees are encouraged to find recreational opportunities in the community and program, which the people we serve will enjoy. Some examples of recreational opportunities include: community fairs, craft shows, movies, shopping, restaurants, etc.

Community outings must reflect the desires of the people receiving support services and should be appropriate for both the people involved and the community setting. These activities should be within the person's budget as well as be meaningful and relate to their PCP. Employees must be sensitive to the environment where the activity will take place in order to be certain the group size is acceptable. For example, in some quieter settings it may not be appropriate for a large group of six people (plus employees) to interact. Employees should not come to work with a personal agenda of activities.

The people receiving supports will be encouraged to participate in supervised recreational and leisure activities for enjoyment and skill acquisition. These activities will include: community recreational programs, community activities and activities within the program. Employees are to assist and support in every way possible if a person is having trouble or is unable to participate in activities and household chores.

Permission from Management and the Legal Representative is required if the person served was invited to an employee's home prior to the visit. The employee is always required to provide safety and supervision in a healthy environment. Additionally, employees may be involved in activities (i.e. bingo, bowling, swimming, concerts) with the people receiving services as long as the person is also directly involved. Any financial gains or incentive awarded to employees or the person served during or because of an activity is the property of the person(s) served. While in the community, employees must never leave any of the

people we serve alone in the vehicle or elsewhere for any amount of time, unless specifically outlined otherwise in the Person Centered Plan.

EMPLOYEE COMMUNICATION

All employees of L.A.D.D., Inc. are required to follow the Mission, Vision, and Values of the organization. This is a Job Essential/requirement for all employees to remain employed. All employees also have core competencies written into their job description which they are required to meet. This means that all employees must demonstrate they are able to respect ALL people's differences including co-workers and treat everyone with dignity and respect.

Employees are to communicate with honesty, integrity, openness, and with a positive intent. Although people in all types of employment will, on occasion, find themselves in a situation of conflict or disagreement with a co-worker or management positive approaches must be used. If something is troubling or disrupting job performance, employees need to review the Mission, Vision, and Values as well as their core competencies as a reference for expectations. Using S.O.U.L. will help to resolve problems that may arise. **Stop**- take a deep breath; **Open** – your mind & body to solutions that align with the core values; **Understand** – that you value P.E.O.P.L.E., this includes your co-worker, say the values out loud if needed. **Link** – to the best part of yourself and feel that compassion, caring, and peace. Following the S.O.U.L. process with the positive words and actions achieved through this process will move towards a 'SOUL'ution (solution).

Make sure you ask yourself, "What is the positive intent of my communication?" Then discuss the problem with your co-worker, management, or whoever your concern is involves. If employees ever feel they need assistance, they need to ask Management to help them find a solution. Management is sincerely concerned about employees' welfare and satisfaction at work and will do everything possible to resolve conflict. Management is here to 'make the difference' in employees' lives too!

L.A.D.D., Inc. will not employ people who choose not to align with the corporation's values as outlined in all employees job descriptions at all levels. . Any employee displaying such behaviors will be subject to disciplinary action up to and including immediate separation from employment. Therefore, we will not tolerate, under any circumstances, threatening or abusive behavior towards anyone working for or with L.A.D.D., Inc. or any of the people receiving services. See the Harassment Policies in this book.

While working, employees are expected to create a positive atmosphere showing you **C.A.R.E.** (Compassion, Affirmations, Relationships, Empathy) for the people served. Employees must demonstrate kindness and compassion to the people receiving supports as well as their co-workers; this is a job requirement. In order to accomplish this, employees must be able to communicate effectively and appropriately with each other throughout the shift. Disagreements among employees cannot prevent communication or affect the positive environment for the people served. Any employee who is unable or unwilling to communicate appropriately with positive intent per their job description will be subject to disciplinary action up to and including separation from employment. A core competency is to maintain the self-esteem of others during interactions, communicating with a positive intent, and a willingness and desire to improve. This is expected from all employees.

If employees feel they are unable to communicate effectively with Management, or believe concerns are not being addressed, such issues should be taken to the next level of Management. Employees are expected to move to the next level of management until concerns are adequately addressed; refer to the Corporate Structure/Chain of Command in this book. Communication problems with Management need to be reported to the next level so that open lines of communication are established and working conditions are appropriate. If an employee is unable to resolve a conflict, they need to follow the Complaint Procedure found in the CCP and available on the website.

HIPAA SECURITY AND ELECTRONIC COMMUNICATIONS

It is the policy of L.A.D.D., Inc. to protect the privacy and confidentiality of protected health information for the people we serve and the employees of L.A.D.D., Inc. The following safeguards/security measures have been implemented to insure this privacy protection.

Employees of L.A.D.D., Inc. are required to do the following:

1. To protect the privacy of the people's individual records:
 - a. Sign-out individual records when removing from the home, including the following information:
 1. Name of record leaving the home
 2. Date
 3. Employee Signature
 4. Destination
 5. Employee must sign the record in when it is returned.
 - a. While out of the home, employees must secure the record(s) at all times. This includes whether the record is on their person or locked in their vehicle; including insuring no information is visible from windows.
 - b. Employees must take steps to insure people who do not have a need to know or have permission to see information regarding the individuals we serve do not have access to any individual records, information, etc.
 - c. When employees leave the program, they are responsible for securing the premises by locking all doors.

- b. Carrying confidential records:
 - 1. Lock records in trunk, when possible.
 - 2. If records have to be left in vehicle for a short amount of time insure vehicle is locked and records are out of sight; not visible.
 - 3. Records must not be left in vehicle for an extended period of time, i.e. overnight.
- c. Any devices containing confidential material (i.e. Laptops, Blackberry, Phones, Tablets, Day-Runners, Planners, etc.) must be kept secure at all times and must be password protected.
- d. Verification of Identification:
 - 1. Employees must ask for identification to verify authority of anyone requesting information.
 - 2. Employees must make reasonable attempts during phone conversations to verify the caller.
- e. Faxing:
 - 1. Employees should make reasonable attempts to verify fax numbers prior to faxing confidential and private information.
 - 2. Employees need to periodically call to verify the intended recipient receives the faxes.
 - 3. Management will keep fax machines in a reasonably secure location.
 - 4. Employees will use required L.A.D.D., Inc. cover sheet when faxing.
- f. Computers/Internet:
 - 1. The electronic communications systems, which include, but are not limited to, the telephone, electronic mail, voice mail, facsimiles, L.A.D.D., INC. databases, computers, accessing the Internet, the World Wide Web during work hours or on L.A.D.D., Inc. devices, and all information stored on them are the property of L.A.D.D., Inc. and are provided at L.A.D.D., Inc.'s expense. All information and messages that are created, sent, received, accessed, or stored on these systems constitute company records and are property of L.A.D.D., Inc., and therefore the following expectations must be followed by all employees using any L.A.D.D., Inc. equipment:
 - 2. Email and any usage of L.A.D.D., Inc. computers are not to be used in any way to harass, defame or humiliate. Electronic communications may not contain content that a reasonable person would consider to be defamatory, offensive, harassing, disruptive, or derogatory, including but not limited to sexual comments or images, racial or ethnic slurs, or other comments or images that would offend someone on the basis of race, gender, national origin, political beliefs, disability, sexual orientation, pornography, religious or political beliefs, national origin or disability. Employees who receive any emails via company computers or from other employees with this content must report the matter to Corporate Compliance immediately.
 - 3. The L.A.D.D., Inc. electronic communications systems are to be used primarily to conduct company business. Employees may not use the electronic communications systems for political causes; football pools or other sorts of gambling; illegal activities; seeking/inquiring about job opportunities outside of the organizations; list serves for non-work purposes; solicitations or advertisements for unrelated work purposes; or creating, possessing, uploading, downloading, accessing, transmitting, or distributing materials of a sexual nature.
 - 4. Employees may not use L.A.D.D., Inc.'s electronic communications systems to post non-work related information, opinions, or comments to Internet discussion groups, Social Networking sites and other such forums. Employees are prohibited from passing off their views as representing those of L.A.D.D., Inc. Again, while at work; employees must follow the corporate values as required in the core competencies of their job description.
 - 5. There should be no expectation of privacy in anything created, stored, sent or received on the company's computer system.
 - 6. Any computer activity during work hours or on L.A.D.D., Inc. Computers, including messages, may be viewed by L.A.D.D., Inc. without prior notice.
 - 7. Computers cannot be used for the transmission or viewing of profanity, adult related material, sexually explicit or otherwise offensive material.
 - 8. Virus protection is maintained by the IT/QA Department. No other forms of virus protection software are to be used or downloaded with out approval from the IT/QA Department.
 - 9. All transmissions of confidential information by internet, diskette or any other data storage device must be encrypted as specified by the HIPAA Security Rule.
 - 10. Management must maintain a log-on password and screensaver password on all computers. Passwords must contain a combination of upper and lower case letters, numbers and functions. Ex: 1L#dd\$
 - 11. Employees should keep in mind that emails, texting or other forms of business communication must be communicated with a positive intent and must communicate appropriately and professionally.
 - 12. Only work related information or work products should be sent through email.
 - 13. Social Networking sites are subject to the HIPAA confidentiality standards regardless of time of use.
 - 14. Emails that go outside of the L.A.D.D., Inc. Citrix that contain any identifying information regarding a person served, such as full name or a description that would make them easily identified must be encrypted and only sent for purpose of Treatment, Payment or Health Care Operations. The sender of this type of email should contact the agency where the information is being sent to see if they have a secure email system set up prior to sending this type of information or use L.A.D.D., Inc. encryption system.

15. Electronic communications must be positive, motivating and fit the Mission, Vision and Values of L.A.D.D., Inc.
16. Employees cannot download or add any programs to company computers without IT/QA Department approval.
17. Backups must occur regularly according to the Technology Policy for all-important data with backup's stored offsite.
18. Any portable device such as a laptop, Blackberry, etc. will be password protected to insure no violations of confidentiality occur. Passwords must contain a combination of upper and lower case letters, numbers and functions. Ex: 1L#dd\$ Employees are never to give out their passwords or log in information.
19. Although employees are expected to use passwords to access some of the electronic communications systems, such communications are not private and security cannot be guaranteed. In surfing the Internet and World Wide Web, employees should remember that all connections and sites visited may be monitored and recorded. Employees should assume that any communications – whether business-related or personal – that they create, send, receive, or store on their company's electronic communications systems may be read or heard by someone other than the intended recipient. In particular, highly confidential or sensitive information should not be sent through e-mail, the Internet, or the World Wide Web unless encrypted or password protected.
20. Employees may not upload, download, or otherwise transmit copyrighted, trademarked, or patented material, trade secrets; or other confidential, private, or proprietary information or materials in violation of any legal constraints. Employees may not upload, download or otherwise transmit any illegal information or materials. Employees may not use L.A.D.D., Inc.'s electronic communications systems to gain unauthorized access to remote computers or other systems or to damage, alter, or disrupt such computers or systems in any way, nor may employees, without authorization, use someone else's code or password or disclose someone else's code or password, including their own. Employees may not enable unauthorized third parties to have access to or use L.A.D.D., Inc. Electronic communications systems, nor may employees otherwise jeopardize the security of L.A.D.D., Inc.'s electronic communications systems.
21. Employees must use the utmost care in creating electronic communications. Even when a message has been deleted, it still exists on a back-up system, can be recreated, printed out, or may have been forwarded to someone else without it creator's knowledge. As with paper records proper care should be taken in creating electronic records, which may someday have to be produced in connection with legal and/or business needs.
22. As with paper documents created and received by an employee, it is each employee's responsibility to insure that those electronic messages that should be retained are in fact saved. Those messages that need not be retained should be deleted.
23. Any files downloaded from the Internet and any computer disks received from non-L.A.D.D., Inc. sources must be scanned with virus detection software before installation and execution. The intentional introduction of viruses, attempts to breach system security, or other malicious tampering with any of your employer's electronic systems including the L.A.D.D., Inc. databases are expressly prohibited and employees may face criminal prosecution.
24. All information accessed by employees either in electronic or written format will be done on a need to know basis. Unauthorized access to information not needed to complete job responsibilities is prohibited.
25. L.A.D.D., Inc. employees may be using electronic systems/databases in conjunction with contract agencies; and therefore, will be required to follow additional security standards (such as no printing of materials) set by those agencies in addition to all of the above rules.

Any suspected violations of this policy are to be reported to the Corporate Compliance Officer immediately.

L.A.D.D., Inc. reserves the right to monitor, access, retrieve, read, and disclose to law enforcement officials, contract agencies or other third parties all messages created, sent, received, or stored on the electronic communications systems without prior notice to the originators and recipients of such messages. Authorized employees may monitor the electronic communications of employees to determine whether there have been any violations of law, breaches of confidentiality or security, communications harmful to the business interests of L.A.D.D., Inc., or any violations of this policy and any other company policy.

CONFIDENTIALITY/HIPAA

It is the policy of L.A.D.D., Inc. to protect the privacy and confidentiality of protected health information for the people we serve and the employees of L.A.D.D., Inc. In accepting employment with L.A.D.D., Inc. employees are placed in a position of trust regarding confidential information. Each person we support has a right to confidentiality. Any and all information pertaining to the people we serve is considered to be confidential and protected by the Federal HIPAA (Health Insurance Portability Accountability Act) regulations. Information may only be released in accordance with treatment, health care operations and billing purposes or with proper releases and/or authorizations. Employees will receive further HIPAA training in the program at which they work.

Taking pictures of the people served without written consent is prohibited. This includes all formats for collecting and storing images such as cell phones, video recorders, flash drives, hard drives etc.

Failure to protect confidentiality is a serious offense and could result in separation from employment, federal fines of up to \$25,000.00 and possible imprisonment. If at any time an employee is unsure about disclosing information pertaining to the individuals we serve, they should contact Management. L.A.D.D., Inc. requires that the records of the people we serve be kept confidential and safeguarded at all times. State of Michigan Licensing rules require that the records of the people we serve be kept confidential and properly safeguarded at all times. If an employee is aware of a HIPAA violation, they must report this information to the Corporate Compliance Officer.

POLICIES AND PROCEDURES

EQUAL EMPLOYMENT OPPORTUNITY STATEMENT

L.A.D.D., Inc. subscribes to a policy of equal employment opportunities and will maintain and conduct all practices relating to recruitment, hiring, discipline, and other terms and conditions of employment in a manner which does not discriminate on the basis of race, color, religion, national origin, age, sex, handicap, marital status, height, weight, or sexual orientation.

UNDER MICHIGAN LAW, a person needing accommodations for employment must notify L.A.D.D., Inc. in writing within 182 days after the need is known or reasonably should have been known. However, this does not waive the individual's right under Title I of the Americans with Disabilities Act of 1990, as amended, which imposes no time limit and does not require accommodation request to be in writing. Failure to notify L.A.D.D., Inc. may result in a loss of employee's rights. L.A.D.D., Inc. will make efforts to provide accommodations that are reasonable and do not deviate from or cause harm to the people receiving supports and do not impair the ability of L.A.D.D., Inc. to conduct its business. Should an employee have any questions or concerns regarding their rights, they must contact the Corporate Compliance Officer immediately.

L.A.D.D., Inc. will not discriminate against people with disabilities in regard to any employment practices or terms, conditions, and privileges of employment. This prohibition covers all aspects of the employment process; including: application, testing, hiring, assignment, evaluation, disciplinary actions, promotion, medical examinations, training, separation, compensation, leave, benefits, or any other term, condition or privilege of employment.

If an employee is a person with a covered disability as defined by law, then L.A.D.D., Inc. will make every effort to accommodate the disability. The request for accommodation must be made to the Corporate Compliance Officer. If an employee feels that they have been discriminated against they need to report it to the Corporate Compliance Officer for investigation and review by the Board of Directors.

WHISTLEBLOWERS POLICY

If any employee reasonably believes that some policy, practice, or activity of L.A.D.D., Inc. is in violation of law, they must follow the Complaint Procedure. Complaints can be made anonymously; however, employees may disclose their name and allow the disclosure of their names with respect to any such allegations, as appropriate. Follow up questions and investigation may not be possible or may be hindered unless the source of the information is identified. See also Corporate Compliance Plan.

It is the intent of L.A.D.D., Inc. to adhere to all laws and regulations that apply to the organization and the underlying purpose of this policy is to support the organization's goal of legal compliance. The support of all employees is necessary to achieving compliance with various laws and regulations. An employee is protected from retaliation only if the employee brings the alleged unlawful activity, policy, or practice to the attention of L.A.D.D., Inc. and provides L.A.D.D., Inc. with a reasonable opportunity to investigate and correct the alleged unlawful activity. The protection described below is only available to employees that comply with this requirement.

L.A.D.D., Inc. will not retaliate against an employee who in good faith, has made a protest or raised a complaint against some practice of L.A.D.D., Inc., or of another individual or entity with whom L.A.D.D., Inc. has a business relationship, on the basis of a reasonable belief that the practice is in violation of law, or a clear mandate of public policy. One of L.A.D.D., Inc.'s core values includes open communication at all levels.

Additionally, L.A.D.D., Inc. will not retaliate against employees who disclose or threaten to disclose to a supervisor or a public body, any activity, policy, or practice of L.A.D.D., Inc. that the employee reasonably believes is in violation of a law, or a rule, or regulation mandated pursuant to law or is in violation of a clear mandate of public policy concerning the health, safety, welfare, or protection of the environment.

MANAGEMENT RIGHTS

L.A.D.D., Inc. expressly retains and reserves the right to operate its programs as it determines advisable in its sole discretion. This includes, but is not limited to, the right to:

1. Hire, transfer, suspend, or discipline its employees and recommend separation from employment. The Administrator or a person expressly authorized by the Administrator is the sole person who has the authority to make a decision to separate from employment, as L.A.D.D., Inc., in its sole discretion, deems advisable.

2. Determine the work hours of the employee, assign the employee and lay off the employee as L.A.D.D., Inc., in its sole discretion, deems fit.
3. Management reserves the right to reduce work hours and transfer as the needs of the programs change or requested by a person served or guardian/family. During time of staffing shortages or other emergencies, mandatory overtime and/or working in another location will be required.
4. Determine starting and quitting times and the number of hours to be worked by employees.
5. Establish and change work schedules, location or work site, work standards and the methods or processes and procedures by which such work is to be performed by employees.
6. Determine the job duties of each employee, subject to change without written notice to the employee.
7. Manage its affairs efficiently and economically, including the determination of quantity and quality of support services to be rendered, the control of equipment to be used, and discontinuance of any support services or methods of operation.
8. Produce new equipment, methods, or processes, change or eliminate existing equipment, institute technological changes and decide on supplies and equipment to be purchased.
9. Determine the number, location, and type of programs, direct the work force, assign the type and location of work assignments and determine the number of employees assigned to operations.
10. Close, reduce or otherwise alter the scope of operation of any or all programs.
11. Select employees for promotion or transfer to other supervisory positions, and determine the qualifications and competencies of the employees to perform the available work.

GENERAL RULES

The purpose of employee rules is to define employee rights; not to restrict them, and also to provide standards and expectations of the job meant to coincide with their job responsibilities. They exist to protect the best interests of all employees and people receiving support services. Failure to comply with the following rules will result in disciplinary action up to and including separation from employment.

1. Employees are expected to follow the company's Mission, Vision, and Values and exhibit behavior that is in the employer's best interest. Employees demonstrating behavior on or off the job that is found to be a deliberate violation or disregard of standards of behavior which L.A.D.D., Inc. has the right to expect of their employees will receive disciplinary action up to and including separation from employment.
2. Because we care for vulnerable people, employees cannot leave the scheduled shift until relieved by another trained employee or released by Management. The Staffing Policy must be followed. All employees must insure the proper staffing pattern is followed and all care of the people we support is completed before leaving shift.
3. Employees must be awake and alert at all times. Sleeping, dozing or other postures that reduce alertness are prohibited (i.e. employee on the couch/chair with pillow or blanket and/or eyes closed, etc.)
4. Deliberately falsifying records, including but not limited to: documentation, notes, employment application, logging in time on electronic payroll system for other employees, calling into electronic payroll system when not working, program documentation, etc. is prohibited.
5. Documentation of any kind pertaining to the job is the property of L.A.D.D., Inc., the person served and/or the Responsible Mental Health Agency. Documentation may also be done electronically with a password assigned to each employee. If this is the form of documentation, an employee is never to give out their password to another employee. An employee is not allowed to download, save, write down information or copy any documentation, records, etc. of a person served and/or of L.A.D.D., Inc. services. This is all protected and confidential information. At no time is documentation or records to leave the program unless approved by Management and signed out.
6. Theft, sabotage or misuse of any property is strictly prohibited.
7. Theft of any property or money from the people who receive support services is prohibited. Employees will be legally prosecuted for violations and subjected to immediate separation from employment.
8. Lending money to or borrowing money from the people receiving support services is prohibited.
9. Personal business must be scheduled outside of paid scheduled shifts.
 - a. At no time are employees allowed to leave the work site on a scheduled shift for personal business without prior approval from Management.
 - b. At no time may an employee conduct personal business at the worksite. (i.e. personal laundry, child sitting, etc.)
 - c. At no time may an employee use the company vehicle for personal business.
 - d. At no time may an employee use any company equipment for personal use (i.e. laundry, computers, mower, etc.)
 - e. At no time may an employee take a person receiving support services with them on any personal business.
10. At no time may an employee engage in activities that may result in receiving personal gain while employed by L.A.D.D., Inc. and while working with the people who receive support services.
11. Employees must maintain confidentiality concerning the people we serve and follow all HIPAA requirements. Information concerning the people we serve may not be released to any individual or agency without the approval of Management.
12. Employees are responsible for personal belongings, including money brought to the work site. L.A.D.D., Inc. will not be held responsible for any loss/theft.

13. Employees are required to keep the people we serve safe at all times and immediately report any instances of inappropriate treatment.
 - a. Employees are prohibited from withholding information concerning any inappropriate treatment of the people who receive support services.
 - b. Employees must cooperate fully with any investigations.
 - c. Employees must work cooperatively with Management and Regulatory Agencies during any investigation and must be honest and forthright with information pertaining to the investigation to remain employed.
 - d. Honesty and integrity; Standing In Truth are an employment requirement.
14. The Staff Communication Logs should always focus on facts relating to daily operations affecting the people we serve. This log is not a place to air opinions, disputes, vulgar language or personal problems.
15. Possession of weapons, drugs, or alcohol is prohibited.
16. Fighting is prohibited.
17. Harassment or interfering with the work of other employees is prohibited.
18. Insubordination, which includes failure or refusal to obey instructions of Management, is prohibited.
19. Engaging in any sexual activity while on company time or premises is prohibited.
20. Pets are prohibited on the work site unless prior approval is obtained from Management.
21. L.A.D.D., Inc. requires that contacts related to personal issue be kept brief and do not interfere with the job responsibilities. Use of personal electronic and communication devices is to be limited and can be restricted at any time to insure the safety and care of the people we serve come first when Management deems necessary. Excessive is defined as anything interfering with the quality of care for the people we serve and your job.
22. Management is the primary contact person for each program.
23. Taking photos of the people we serve is prohibited unless prior permission is obtained from Management and written authorization from guardians; this includes a cell phone or any device.
24. Employees must follow all policies and procedures of the Regulatory/ Contract Agencies.
25. All employees must communicate with positive intent and positive tones. Gossiping and negative tones & comments are not acceptable.
26. Employees must complete all required documentation prior to leaving their shift or may be required to return to work. All shift duties must be completed during employees shifts
27. To provide quality care, we must have honest, ethical employees who Stand In Truth, act with kindness and compassion, communicate with positive intent, and immediately correct and report any wrong doing.

HARASSMENT POLICY

L.A.D.D., Inc. has a “zero tolerance” policy on harassment including sexual, racial, disability, religious, ethnic background, age, sexual orientation, or protected activity. Harassment of any kind goes against our Mission, Vision, and Values. It is contrary to basic standards of conduct between individuals and is prohibited by EEOC, State of Michigan and L.A.D.D., Inc. regulations. It will therefore constitute a violation of L.A.D.D., Inc. policy for an employee to engage in any harassing or intimidating act including but not limited to those behaviors defined below. Any such misconduct will subject the employee to corrective actions up to and including immediate separation from employment.

Because of L.A.D.D., Inc.’s strong disapproval of offensive or inappropriate harassment type behavior at work, all employees must avoid any action or conduct which could be viewed as harassment of any kind including sexual harassment.

Harassment is defined as unwelcome oral or written statement, gestures, or actions that may be considered a threat, in which:

1. Such conduct interferes with an individual’s work performance or creates an intimidating, hostile or offensive working environment; or
2. Submission to sexual advances and/or unwelcome harassing actions or comments are a term or condition of employment; or
3. Submission to or rejection of the sexual advances and/or unwelcome harassing action or comments are used as the basis for making employment decisions.

Some examples of harassment include:

1. Deliberate, repeated, unsolicited verbal comments, gestures or physical actions of an offensive nature (i.e., inappropriate touching, patting, derogatory jokes, cartoons, offensive material, etc.)
2. Explicit or implicit promise of career advancement, training, awards, lax time keeping, or lower standards of performance based on acceptance of harassing conditions.
3. Explicit or implicit threats that if the harassing conditions are rejected; the victim will receive a poor performance appraisal, be reassigned to a less desirable position or location, or receive other negative consequences.

The seriousness of harassment depends upon several factors, some of which are:

1. The degree of unsolicited verbal or physical contact; or
2. Repeated actions after complaints or warnings; or
3. Physically threatening statements or actions.

Any type of harassment is unacceptable conduct, and timely corrective action will be taken by L.A.D.D., Inc. when problems of this type exist. Any employee who has a complaint of sexual harassment at work by anyone, including supervisors, co-workers or visitors, should first clearly inform the harasser that his/her behavior is offensive or unwelcome and request that the behavior stop. Employees need to report any occurrences either witnessed or experienced immediately to Management and the employee needs to follow the chain of command until the complaint has been resolved.

Employees believing that they personally have been harassed or believe that harassment has occurred must immediately report such incidents, preferably within 10 days of the alleged occurrence. Reports can be made without fear of negative consequence for the reporting employee based on the issuing of a complaint. Please note that this policy differs from the Whistleblowers Policy. Please refer to Whistleblowers and Corporate Complaint Plan (CCP) for more information.

DRUG POLICY

L.A.D.D., Inc. has a zero tolerance policy for the possession, sale, or use of alcohol, illegal substances, medical marijuana or the misuse of prescription medication while on duty or the presence of these substances in the body while on duty regardless of when or why consumed. Illegal drugs are defined as any drug or substances not obtainable by legal means. This definition includes any prescription drugs obtained or used in any manner other than medically prescribed which includes: a substance for which the employee does not have a personal prescription and also includes due to the nature of the job medical marijuana. It is a violation of this policy for anyone to use prescriptions drugs illegally. However, nothing in this policy precludes the appropriate use of legally prescribed medications. Any prescription that may put the person receiving services in jeopardy or harm (i.e., drowsiness, change in behavior, etc.) should be disclosed to the Human Resource Department.

The possession, sale, or use and ingestion of drugs or alcohol that affect job performance and/or Good Moral Character are prohibited at all times. All employees must continuously meet the Good Moral Character Job Essential/Requirements.

The following screening/testing will be done:

1. Pre-employment
2. Random unannounced screening/testing
3. Reasonable suspicion
4. Post accident

The presence of drugs or alcohol in the work place presents a potential for health, safety, security and accountability problems. For these reasons, all applicants selected for hire will be asked to take a drug screen/test for the presence of illegal drugs as soon as possible. A positive test will nullify any conditional offer of employment and the applicant will not be hired.

Any L.A.D.D., Inc. employee is required to participate in any screening/testing for the presence of illegal drugs or alcohol at any time either announced or unannounced.

L.A.D.D., Inc. may conduct screening and/or contract with an independent certified drug and alcohol testing agency. If an employee is subject to and has a positive drug or alcohol screen result, they may request to go to the certified drug and alcohol testing agency for additional screening/testing. The cost for additional screening or testing is paid by the employee. The certified officer will make the final decision as to a positive or negative test result. Employees must understand that the certified officer may perform a direct observation collection. Any diluted or tampered/adulterated samples will not be accepted, and the employee will be immediately separated from employment.

If the first test comes back positive, the certified officer will notify the employee and discuss any prescription medicines that the employee may be taking at the time of the collection. All medications must be verified by the certified officer. At this time, the employee has the right to request a lab confirmation on any positive test. The employee is responsible to do this in writing immediately; before leaving the premises. The employee is responsible to pay all costs associated with the lab confirmation. If the lab confirmation testing is negative, the employee will be re-instated for employment and L.A.D.D., Inc. will pay for the cost of the lab fee.

The procedure for collection of the sample and the chain of custody will adhere to requirements and guidelines established for these purposes by applicable State and Federal Laws and Regulations, as well as the collection site and testing laboratory personnel.

A positive test result in any amount of alcohol or illegal substance as revealed by the drug or breath alcohol screen/test will result in immediate separation from employment. If an employee tests positive and exhibits signs of impairment; i.e., glassy eyes, slurred speech, disoriented; then his or her ability to drive is impaired and the employee is responsible for finding alternate transportation. If an employee attempts to operate a vehicle, L.A.D.D., Inc. will contact the police.

Management can determine and make a referral for reasonable suspicion screening/testing and/or unannounced random drug or alcohol screening/testing. Upon making the decision to screen/test, Management will pull that employee from duty and remind

him/her of the Drug Policy. Management will arrange for transportation to the collection site as soon as possible or have on-site testing. Employees will have an opportunity via Issues to Be Reviewed to explain his/her side of the incident. Management is also authorized to call for police protection if the employee's behavior poses a threat.

If the test is negative, the employee will be notified to return to work with no loss in pay.

If the test is positive, the employee will be separated from employment. People who seek rehabilitation and can provide some type of proof that they actively sought and successfully completed treatment are welcome to re-apply for employment.

Any employee that is involved in any kind of work related accident whether or not the accident is the employee's fault will be required to take a post-accident drug/alcohol test as soon as possible following the accident. In the event the employee is hospitalized, arrangements will be made for the drug/alcohol testing to be done at that time. Failure to notify management of the incident in a timely manner can result in disciplinary action up to and including separation from employment.

Random testing can occur at any time for any reason to insure the safety of the people we serve. Employees will be responsible for ensuring that they report to the test site in a timely manner.

A refusal to submit to a drug or alcohol screen or test means that the employee has chosen to voluntarily separate from employment. Other behaviors will be considered a refusal such as: leaving the test site without completing the test, the inability to provide sufficient quantities of breath or urine to be tested without a valid medical explanation, tampering with or attempting to adulterate the specimen or collection procedure, not reporting to the collection site in the time allotted or leaving the scene of an accident without a valid reason before the tests have been conducted.

The actual result of drug/alcohol screens or tests become part of the Personnel file; and therefore is subject to review by monitoring agencies, state or federal government or other agencies as required by all regulatory rules/agencies.

STAFFING POLICY

It is necessary for staff to always be available to the vulnerable people who are receiving services. Therefore, every L.A.D.D., Inc. employee is responsible to insure that adequate staffing is available at all times for the people supported by L.A.D.D., Inc. All employees are required to cover their scheduled shifts in the event of their absence.

If an employee does not report for their scheduled shift, the employee currently at that location must notify Management immediately. All employees must fulfill the "Staffing Requirements" below when covering their shift. When employees fulfill these Staffing Requirements, they are able to utilize their accumulated "Flex-Time" hours and receive pay for their scheduled shift.

Employees who fail to fulfill this policy are unable to use their "Flex-Time" hours for that shift and are subject to disciplinary action up to and including separation from employment. Requests for a day off must be made in advance to the schedule being posted. Vacation requests should be made at least made three weeks in advance. Management will review emergency situations.

All employees are responsible to fulfill the Staffing Requirements listed below and cover their scheduled shifts in the event of their absence using the Staffing Requirements below:

1. If an employee knows in advance that they will not be able to work a scheduled shift, they must identify an employee to work their shift using the Staffing Requirements and fill out a Shift Change Notification Form and turn into their immediate Manager. The employee scheduled to work as well as the employee that has agreed to work the shift for them, must sign the Shift Change Notification Form.
2. If an employee does not have sufficient time to fill out and complete a Shift Change Notification Form, then the employee must notify Management verbally of the change.
3. Employees who have accumulated "Flex-Time" hours and fulfilled the Staffing Requirements may use their accumulated hours to be paid in the event of absence from a scheduled shift.
4. In the event of illness, employees should make every effort to fulfill the Staffing Requirements and find another employee member to work their shift. If an employee is too ill to make the calls to cover their shift, then they must contact Management in a timely manner to allow time for Management to find someone to work that shift.
5. Due to the nature of our employment, we are unable to employ employees with excessive absences or emergencies preventing their timely attendance at all scheduled shifts.

STAFFING REQUIREMENTS

Once a schedule is posted, employees are required to work that scheduled shift. If they are unable to work, an employee is required to find coverage for their shift using these Staffing Requirements:

1. At least one trained employee must be on each shift.

2. At least one female employee must be on each shift unless there are only men who live in the home/apartment.
3. There will be no overtime allowed unless approved by Management.
4. Management must be informed of the change via a completed Shift Change Notification Form or a phone call.
5. Employees will be able to use their "Flex-Time" accumulated hours when fulfilling the Staffing Requirements.
6. Any employee who is aware of a co-worker or replacement staff not reporting for their scheduled shift must immediately contact Management.
7. Employees must stay on shift until another employee arrives at the site or excused by Management.

Please note the following:

1. Emergency numbers are posted in the program.
2. Excessive or problematic absences and/or tardiness will result in disciplinary action, up to and including separation from employment. If an employee is absent from work for more than 3 consecutive days without contacting Management; it will result in their removal from payroll as a voluntary quit with no notice.

EMPLOYEE EVALUATIONS

Employees will receive an employee evaluation on or near their sixth and twelfth months of employment. Thereafter, L.A.D.D., Inc. will schedule employee evaluations at least annually. The employee evaluations allow Management to discuss overall performance and set goals for the coming year. In addition, evaluations provide feedback concerning strengths and areas for improvement. Evaluations are reviewed with Management and provide opportunities for further discussion and training. Such evaluations may be more frequent and may be conducted without notice at Management's sole discretion.

QUALIFICATIONS

At the time of hire applicants for job positions must meet the program requirements. If driving is required they must have a valid driver's license and must have a driving record that meets insurability requirements. A MVR (Motor Vehicle Report) will be obtained on employees requiring a valid license at the time of hire. The actual hiring of an employee is based on the qualifications of the applicant, as determined at the sole discretion of L.A.D.D., Inc. Employees must be at least 18 years of age, continuously meet the Job Essentials, (with or without accommodations) be of good moral character, be capable of handling emergency situations, be suitable to meet the physical, emotional and social needs of each person who receives support services, perform job responsibilities and follow the Mission, Vision and Values of L.A.D.D., Inc. Employees working in licensed programs must also meet the State of Michigan licensing requirements. Employees will be drug screened at time of hire and may be tested randomly throughout employment- See Drug Policy.

No practice or behavior inconsistent with or in conflict with individual moral and ethical conduct required by L.A.D.D., Inc. shall be tolerated from employees. Any failure to maintain these ethical and moral standards may be grounds for counseling and/or immediate dismissal from employment. Honesty and integrity/Stand In Truth are an employment requirement. Employees must meet the core competencies listed in their job descriptions.

Employees are considered role models. Therefore, employees are held to a stricter standard of behavior and practice than in most other jobs in both their work and their personal lives. Counseling may be required, and these employees may face dismissal for behavior and practices deemed to be inappropriate in fulfilling their function as role model if it conflicts with the requirement of "Good Moral Character".

The procedure for establishing good moral character is as follows: all applicants will fully complete the Job Application and Release of Information. Prior to beginning employment, a Conditional Job Offer will be made and Management will check at least three references and perform a Criminal Records Check. For licensed facilities an FBI Fingerprint check is also required. If a history of criminal conviction is found to violate the Good Moral Character Standards, the employee will be separated from employment with L.A.D.D., Inc. Employees must meet all contracting requirements that pertain to designated registries such as the U.S. Department of Health and Human Services and Office of Inspector General (OIG) list of Excluded Individuals and Entities.

To maintain employment, employees must meet all L.A.D.D., Inc. Job Essentials, Contracting Agencies Contract requirements for employees providing staffing supports including Good Moral Character at all times, with or without reasonable accommodations.

IMMIGRATION REFORM AND CONTROL ACT OF 1986

L.A.D.D., Inc. is committed to full compliance with the federal immigration laws and will not knowingly hire or continue to employ anyone who does not have the legal right to work in the United States.

As a condition of employment, all employees will be required to provide documentation including, but not limited to, e-verifying their identity and legal authority to work in the United States, which includes the completion of the I-9, Employment Eligibility

Verification Form.

NEW HIRE ACT

By federal law all employers are required to report newly hired employees to the designated state agency in the state where the employees are hired within 20 days of the hire date. This requirement is the result of legislation designed to improve child support enforcement by locating parents who have neglected to pay support.

PERSONNEL/EMPLOYEE FILE

L.A.D.D., Inc. needs to have complete and accurate information on each of its employees. Personnel records are kept within normal business practices, including separate storage of confidential/medical information, and entries/documents are generated at or around the time of occurrence. This includes all direct support, nonexempt, exempt, full-time and part-time employees. The contents of personnel records are confidential and access to them is limited to those directly involved in the supervision and/or retention of the individual employee, as well as regulatory and accrediting agencies.

In compliance with state and federal laws, all L.A.D.D., Inc. employees must have the following forms on file (this is a non-inclusive list):

Acknowledgement of Receipt of Handbook/ Code of Conduct Application	New Employee Information Form
Employee Medical Release Form (Physical)	Job Responsibilities
Job Essentials	Job Description
Criminal History Authorization	Receipt of Privacy Notice
New Employee Benefit Checklist	Employee Flexible Benefit Form
Employee Responsibility of Funds	Criminal History Authorization
Tuberculosis Test/Chest X-ray	Pre-in-service Training Form
Federal and State Withholding Tax Forms	Website/Video release
I-9 Employment Immigration Eligibility Form	Consent for Medical Treatment
Employment Reference Checks	Training
New Employee Check List	Photocopy of Driver's License and MVR
Authorization for Deductions	Third Party Accessibility Release
L.A.D.D., Inc. Conditions of Employment	Photocopy of Social Security Card
Authorization to Disclose Employee Info. & Release of Liability (Rec. Rights)	
Denial of Existence of Criminal History /Agreement to Notify of Arraignment or Conviction	

CONTENTS OF FILE—a personnel file will be kept for each employee. Personnel files contain the employee's application for employment, Federal and State tax forms, evidence of education, resume, training and previous experience, the records of hiring, job assignments, work schedules, salary, employee evaluations, correspondence relating to the employee.

PERSONNEL RECORDS—For the purpose of maintaining complete and accurate personnel records, employees are responsible for notifying the Office, in writing, when changes in address, telephone number, and/or family status (births, marriage, death, divorce, legal separation, etc.) effect an employee's income tax status, group insurance or paycheck. This responsibility includes employees on lay-off status and leaves of absence. The information needed includes:

1. Change of address.
2. Any change affecting withholding status.
3. Legal change of name—copy of driver's license and Social Security Card.
4. Change of people designated to call in case of emergency.
5. Changes that would affect insurance benefits.
6. Changes in driving status i.e. suspended or restricted license. (See Transportation Service Policy in this book for further details.)
7. Change in Criminal History in addition to appearance on any Local, State or Federal Registries

EMPLOYEE ACCESS TO FILE— Pursuant to Michigan law, employees may review and request a copy of their personnel file. They may also file a response regarding the content of their personnel file. If an employee would like to review their personnel file, a written request must be submitted to the L.A.D.D., Inc. Office.

The request for review should include the employee's name, dates of employment and the specific location at which the employee works or worked. The examination of the file will be supervised. Appointments will be scheduled during regular office hours, unless other arrangements are necessary.

If an employee requests a photocopy of the contents of their personnel file, L.A.D.D., Inc. requires reimbursement at the current established rate.

If there is a disagreement between L.A.D.D., Inc. and the employee regarding the contents of the file, the employee may submit up to 5 pages (8.5x11) of written response. This response will be included when the personnel file is divulged to a third party.

DEFINITIONS OF EMPLOYMENT STATUS

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

Direct Support: Employees must meet all regulatory requirements and qualifications for providing supports/services per agency contracts. They must meet all standards/code of conduct in this handbook.

Non-Direct Support or Ancillary: Employees hired to perform non-direct support related services and may be assigned an Ancillary Handbook in place of this handbook based on their position. They may not be required to meet all standards required by regulatory agencies and contracts as outlined in this handbook due to the nature of their job.

Exempt: All salaried employees whose positions meet specific criteria established by the Fair Labor Standards Act (FLSA) and applicable state law and who are exempt from overtime pay requirements.

Non-exempt: Employees whose positions do not meet FLSA and state exemption tests and who are paid a multiple of their regular rate of pay for hours worked in excess of 40 per week.

Full-time: Employees designated as full time work 32 or more hours per week. Only employees working 40 hours per week consistently are eligible for L.A.D.D., Inc. health benefits, for eligibility and waiting requirements see Human Resource Department. Health Benefits include: insurance (health care, dental, vision and life). However, please note that employees with insurance benefits through L.A.D.D., Inc. must work 40 hours per week consistently to keep their benefits per the Insurance Contract. Working less than 40 hours for 3 pay periods in a row will result in review of Health Benefit Eligibility.

Part-time: Employees who work 31 hours or less per week. They may be eligible for other benefits as outlined in this handbook/code of conduct.

Temporary: Employees who are hired for a pre-established period: usually during peak workloads or for vacation relief. They may work a full-time or part-time schedule. They are ineligible for L.A.D.D., Inc. benefits and holiday pay.

JOB DESCRIPTION

Applicants will receive the written Job Description and Job Essentials, which describe the following:

1. Qualifications necessary for the position.
2. Job Description/title.
3. Core competencies
4. Essential functions of the position applied.
5. Key performance requirements and standards

Any Job Description distributed by L.A.D.D., Inc. is not inclusive of all duties that employees will be required to perform. L.A.D.D., Inc. expressly reserves the right to change the responsibilities and duties as necessary. The Job Description may be changed verbally and L.A.D.D., Inc. need not provide a new written Job Description.

The Job Description and Job Essentials shall be signed by each employee to indicate acceptance and knowledge of the responsibilities of the position. The signed Job Description and Job Essentials shall be placed in the personnel file at the office. All employees must continually meet the Job Essentials and Job Descriptions to remain employed.

PROMOTIONS

L.A.D.D., Inc. will endeavor to fill new job opportunities from among its current employees provided, within L.A.D.D., Inc.'s, judgment, a qualified person is available. L.A.D.D., Inc. will strive to promote the best-matched individual, based on demonstrated ability to assume greater responsibility. At the same time, L.A.D.D., Inc. may need to recruit and hire outside the company to attract an individual who will best match a particular opening. To be considered for promotion, employees should follow the instructions on the job posting.

L.A.D.D., Inc. reserves the right to hire outside its current employees if applicants from outside L.A.D.D., Inc. are best matched for the position. L.A.D.D., Inc. also reserves the right to make interim promotions or appointments pending a decision to fill a vacant or newly created position without undergoing the application process.

EMPLOYEE REFERRAL BONUS

L.A.D.D., Inc. rewards eligible employees who refer qualified job applicants to L.A.D.D., Inc. when these referrals are hired and remain employed by L.A.D.D., Inc. for, 180 and 365 consecutive days. Current employees are eligible to receive an employee referral bonus, in an amount to be determined by L.A.D.D., Inc. if they refer an individual who fulfills all employment requirements and Job Essentials. The referring employee must also be employed at the completion of the new employee's specified time period (i.e. 180 and 365 days to receive the bonus). Management is ineligible to receive a referral bonus.

RESIGNATION

When an employee decides to leave L.A.D.D., Inc., please advise Management at least two weeks prior to the date of departure so that an orderly transition can be made. This process includes turning in L.A.D.D., Inc. property, completing required forms

and obtaining appropriate clearances. Employees resigning are expected to work their scheduled shifts until they leave employment. Failure to give and work a two week notice will result in loss of Flex-Time. (See Flex-Time)

An employee may be involuntarily separated from employment when L.A.D.D., Inc. determines that continued employment will not be to the benefit of the employee or L.A.D.D., Inc. Since the employment relationship of employees is of an at-will nature, an employee can be dismissed without notice.

If an employee is eligible, a summary explanation of benefits is available at separation of active. Employees are urged to promptly read the medical plan booklet's explanation of conversion privileges.

FINAL PAY CHECKS

Final checks, at the time of separation from employment, will be sent to the most recent address on file unless employees request otherwise in writing. All final checks are 'live' checks; we are unable to complete any direct deposits. It is expected that all building keys and other L.A.D.D., Inc. property which may have been entrusted to the care of the employee be returned at the end of employment.

REDUCTION IN WORKFORCE

If elimination of position or reduction in hours becomes necessary due to funding problems, lack of work, change in population or other circumstances, reductions and/or transfers will be made. Based on the needs of each program or person, the number of staffing hours could be reduced or increased at any time. The Administrator shall determine the specific position reductions. Employees may apply for any open position within L.A.D.D., Inc.

CONFLICT OF INTEREST

The employment of relatives of employees is permitted by L.A.D.D., Inc. as long as qualifications for the position are met and, in the opinion of L.A.D.D., Inc., employing the relative will not create an actual or perceived conflict of interest. Employees will not be permitted to work in positions where relatives will influence, or be influenced by, decision affecting work assignments, responsibilities, salary, promotion or other career matters. Managers who seek to hire, transfer or promote their own relatives must obtain prior approval from the Administrator.

Relatives, for the purpose of this policy, include a spouse, parent, child, parent-in-law, child-in-law, sibling-in-law, stepchild, stepparent, stepsibling, grandparents, grandchild, sibling, and any individual with whom an employee has a personal relationship.

Personal relationships may create an actual or perceived conflict of interest, and/or create the risk of sexual harassment/hostile work environment. Thus Management may not hire, promote or directly supervise any person with whom they have a personal relationship, nor may they engage in personal relationships with their immediate subordinates.

A personal relationship includes, but is not limited to the following activities: dating, romantic or sexual relations, sharing the same household, or other activities or relationships that may give rise to an inherent subjectivity or conflict of interest.

An employee must notify L.A.D.D., Inc. Management if his or her relationship with another employee changes to fit the definition of "relative" above. If a personal relationship develops between a supervisor and subordinate, both employees are required to inform appropriate Management.

L.A.D.D., Inc. reserves the right to use its sole discretion in hiring, assigning and transferring relatives in a manner calculated to eliminate potential conflicts of interest or other employment complaints. To do this, L.A.D.D., Inc. will take action that is fair and equitable and that will remove any direct reporting or Management relationship between employees who are defined as "relatives" or involved in a personal relationship.

Similarly, L.A.D.D., Inc. reserves the right to use its sole discretion in hiring, assigning or transferring employees who have personal relationships with co-workers. L.A.D.D., Inc. will take action that is fair and equitable to eliminate any direct reporting or Management relationship between employees who are involved in a personal relationship. Finally, L.A.D.D., Inc. may change the placement of relatives and individuals involved in a personal relationship regardless of whether there is a direct reporting or Management relationship, if L.A.D.D., Inc. determines that the personal relationship actually or potentially interferes with job performance.

L.A.D.D., Inc. will determine at its sole discretion, at any time, with or without notice, whether to transfer one or the other of the employees, or take such other action, which is in the best interests of the people we serve and L.A.D.D., Inc.

SOCIAL SECURITY PRIVACY POLICY

Pursuant to state law, it is the policy of L.A.D.D., Inc. to protect the confidentiality of social security numbers. No person shall knowingly acquire, disclose, transfer, or unlawfully use the social security number of any employee, person served, or other individual unless in accordance with the procedures and rules established by this policy.

Social security numbers shall not be placed on identification cards, badges, time cards, employee rosters, bulletin boards, or any other materials or documents designed for public display. Documents, materials, or computer screens that display social security numbers or other sensitive information shall be kept out of public view at all times. Only authorized employees shall have access to social security numbers. Social Security numbers of people served must be safeguarded at all times.

Documents containing social security numbers shall only be disclosed in cases where state or federal law, rule, regulation, or court order or rule authorizes, permit, or requires that a social security numbers appear in the document. Documents containing social security numbers, which are sent through the mail, shall not reveal the number through the envelope window or otherwise be visible from outside the envelope or package. Social security numbers shall not be sent through email unless the connection is secure or the number is encrypted.

All documents or files that contain social security numbers shall be stored in a physically secure manner. Social security numbers shall not be stored on computers or other electronic devices that are not secured against unauthorized access. Documents or other materials containing social security numbers shall not be thrown away in the trash; they shall be discarded or destroyed only in a manner that protects their confidentiality, such as shredding.

Social security numbers should only be collected where required by federal and state law or as otherwise permitted under the Michigan Social Security Number Privacy Act. If a unique identifier is needed, then a substitute for the social security number shall be used.

Any person who fails to comply with this policy shall be subject to discipline up to and including separation from employment.

If any questions regarding social security number privacy and security should arise contact the Corporate Compliance Officer.

COMPENSATION AND PERFORMANCE

WAGES

Periodically throughout employment a wage increase may be given based on year of service, budgetary considerations and/or performance evaluations. Increases may be considered at the end of the first 180 consecutive days of employment and annually thereafter. Any changes in rate of pay will become effective on the Monday of the first pay period following a change in position or other action that results in a change of rate of pay.

Changes in rate of pay may occur as the result of a change in funding or at the discretion of the Board of Directors. Due to differences in funding sources, rates of pay may vary for different locations. If an employee is relocated or transferred to another program or service, wages may be subject to increase or reduction based on the established rate of pay at that program. If there are no changes in funding from year to year and funds are not available, changes in the rate of pay will not occur. Any deviation from this policy must be recommended by the Administrative staff and approved by the Board of Directors.

TIME KEEPING

The pay period will span 14 consecutive days beginning on a Monday and ending on a Sunday. Wages will be paid on the second Wednesday following the last day of the pay period. The pay period will consist of two 40-hour workweeks. For employees working midnights the week begins at 8:00 a.m. on Monday. For all other shifts the week begins at 12:01 a.m. on Monday. Any hours worked in excess of 40 hours per week (Monday-Sunday) will be compensated at a rate of one-and-a-half times the normal rate of pay.

Employees will be given a badge number (ID#), and personal identification number (PIN#). This information will be used to log in to either the Standard or Telepunch Timekeeping systems.

When using the either system, employees must not call/punch in more than five minutes prior to the beginning of shift, or call/punch out more than five minutes after their shift, unless the relief staff has not arrived or unless otherwise instructed by management. Employees are to 'punch-in' at the beginning of each shift, and 'punch-out' at the end of shift.

Discrepancies or questions relating to a pay period must be addressed to the Office within 90 days of the end of the pay period. Due to issues related to funding, verification, etc. L.A.D.D., Inc. will not make changes to pay after this date.

STANDARD TIMEKEEPING

L.A.D.D., Inc. utilizes an electronic timekeeping system where all employees are required to record hours worked. Employees with computers at the location where they begin their shift will use a computer within the program to log into the system. At no time are employees allowed to log in from their cell phones or any other electronic device other than L.A.D.D., Inc. owned equipment.

Employees should review their electronic timecard daily, and prior to the end of each pay period to insure accuracy. Any discrepancies must be immediately reported to management. If an employee is unable to punch in/out due to technical difficulties

(power outage, computer down, internet service interrupted, etc.), the employee must complete a Missed Punch Record form to document the hours worked. Management will make the appropriate adjustments within the timekeeping system when accessibility is available. Excessive instances of 'forgetting' to punch in/out may result in disciplinary action.

To avoid delay of payment on your check and possible disciplinary action, you must report discrepancies, and/or complete the Missed Punch Record form to document the time worked. Recording time not worked or having a coworker punch in/out on your behalf is falsification of timecards and may result in immediate separation from employment for both you and the coworker

TELEPUNCH TIMEKEEPING

The telepunch option is only for approved employees who do not work where an L.A.D.D., Inc. computer or other electronic device is available. The employee's immediate supervisor will validate the method of timekeeping. Employees will use a designated toll-free phone number to call for punching in and out. If an employee is unable to call/punch in/out due to technical difficulties (power outage, or other approved reason by management), the employee must complete a Missed Punch Record form to document the hours worked. Management will make the appropriate adjustments within the timekeeping system when accessibility is available.

SCHEDULED HOURS

Due to the nature of the support services provided it is necessary that employees be at the work site ready and able to start work at the scheduled time and must remain at the work areas until they are relieved of their duties by another trained employee and/or excused by Management. Any hours worked beyond the scheduled hours must be authorized and preapproved by Management. Employees are not permitted to add, delete or edit schedules in any way. Management will post a schedule. Employees must work their scheduled shift or follow the Staffing Policy to insure the shift is covered and the needs of the people are met at all times. Problems related to schedules must be discussed with Management. If an employee is absent from work for more than 3 consecutive days without contacting Management; it will result in their removal from payroll as a voluntary quit with no notice.

During time of staffing shortages or other emergencies, mandatory overtime and/or working in another location will be required. Schedules are subject to change at any time based on the needs of the programs. Disciplinary action will occur for failure to follow the Staffing Policy. The Staffing Policy is also located in the L.A.D.D., Inc. Directory.

ATTENDANCE

Tardiness is defined as failure to be at the work site, and ready to work at the time scheduled. When employees arrive late for work, the scheduling and plans for the people we support may be seriously affected. Tardiness places an unfair burden on co-workers who must remain on duty after their scheduled shift. Employees who are unavoidably detained must call the program, to assure coverage until they arrive for work. L.A.D.D., Inc. may, at its sole discretion, remove a tardy employee from the schedule for the rest of the shift. Excessive tardiness may result in disciplinary action up to and including separation from employment.

Absenteeism is defined as a failure to appear for and work a scheduled shift. Due to the nature of services, 24 hour/7 days a week, attendance is critical. Every employee is required to insure that there is sufficient staffing on every scheduled shift for the people we serve. Employees who find it necessary to be absent from work are responsible for following the Staffing Policy. Disciplinary action will be taken for problematic absenteeism and/or failure to follow the Staffing Policy up to and including separation from employment. If an employee is absent from work for more than 3 consecutive days without contacting Management; it will result in their removal from payroll as a voluntary quit with no notice.

LEAVE OF ABSENCE

A leave of absence that does not fall under the FMLA may be granted to an employee. Requests for accommodations must be submitted in writing to the Corporate Compliance Officer. A position may not be guaranteed upon return. However, if said employee began their leave with satisfactory evaluation(s), he/she would be considered over new applicants for available positions. L.A.D.D., Inc. reserves the right to grant or refuse all requests for a leave of absence (excluding eligible FMLA's). During a Leave of Absence, service time, Flex-Time, and holidays are not paid or accumulated.

An employee with a covered disability may request a modification of this policy as a reasonable accommodation which shall not result in additional paid leave.

MILITARY LEAVE

If an employee is inducted or enlists in the armed forces of the United States, they are to notify Management so that arrangements can be made to authorize a military leave of absence. The leave shall be for a maximum period of 5 years, except when the employee's period of military service may be involuntarily extended due to an act of war or a declared state of national emergency. In that event, the period of military leave shall be extended, in accordance with federal law, until the end of the involuntary extension of the employee's military service. L.A.D.D., Inc. will follow the Department of Labor guidelines regarding all Military Leave and reinstatement for employment with L.A.D.D., Inc.

Members of the Armed Forces Reserve or National Guard Units who are required to participate in two weeks of annual training will be granted a leave of absence provided proper documentation is submitted. Family members of military, please see Family Medical Leave of Absence (FMLA).

PAYROLL DEDUCTIONS

Various payroll deductions are made each payday to comply with federal and state laws pertaining to taxes and insurance. Deductions will be made for the following: Social Security and Medicare taxes are deducted from wages earned as required by federal law. L.A.D.D., Inc. matches the amount deducted from the employee's paycheck for this program. The following state, federal and court deductions are made to paychecks:

1. Federal and State Income Tax Withholding;
2. Social Security and Medicare Taxes;
3. Voluntary deductions (insurance premiums, TSA contributions, etc.);
4. Compliance with court orders to withhold funds (child support, garnishments, etc.).

Deductions will also be made for contributions for insurance benefits, TSA and other employee authorized deductions. Any misused funds or property, including cost of excessive phone usage, will be withheld from the employee's paycheck in compliance with Michigan law. Additionally, disciplinary action up to and including separation from employment may occur.

L.A.D.D., Inc. will comply with all court orders to withhold payments from paychecks. L.A.D.D., Inc. will supply employees with a copy of the court order as notification that his or her pay will be affected until the court order is fulfilled.

If an employee objects to the court order, they must contact their own legal counsel. By law L.A.D.D., Inc. cannot ignore the order based on employee objections. L.A.D.D., Inc. must receive notice of cancellation of the order via the court system, in the form of a cancellation or amended order from the court. Court ordered pay withholding(s) will not result in discrimination, retaliation, or separation of employment.

JURY DUTY

Employees must notify Management as soon as they receive notice of jury duty. In the event that an employee is selected to participate as an active member of a jury, they must notify Management immediately. Employees must provide written proof of jury duty. In the event that support services to the program or service may be hampered or impeded, L.A.D.D., Inc. reserves the right to request a postponement of said duty.

EMPLOYEE BENEFITS

HEALTH INSURANCE

Only employees who work 40 hours per week are eligible for health insurance. See Human Resources for eligibilities and waiting periods. Full time employees must sign a Flexible Benefit Form whether or not they choose to receive coverage under L.A.D.D., Inc.'s group health care plan. (The 40-hour designation is determined and enforced by the insurance company.)

40-hour full time employees must fill out a Flexible Benefit Form at the time of any status change. A 40-hour full time employee cannot change their benefit election until open enrollment or an event change (see below) in the employee's status.

It is the employee's responsibility to complete the insurance forms accurately and turn them in to the office in the proper time frame. Failure to do so can result in a delay of health care coverage or non-coverage. In order to add a dependent, a Status Change Form must be completed and submitted to L.A.D.D., Inc.'s Office within 30 days of the addition of the dependent (i.e., marriage, birth, adoption, etc.) Failure to submit the Status Change Form within the 30 days could result in non-coverage for the dependent by the health care insurance provider.

There is a pre-tax employee contribution for the health care insurance that will be deducted each pay period. The amount of the employee contribution varies based on the selection of insurance, single or dependent coverage position and the location. Please review the Flexible Benefit Plan Form for the employee contribution; the Office will have a summary plan description of the insurance coverage. It is the employee's responsibility to seek this information and to make a decision as to which insurance coverage, if any, is chosen. If coverage is chosen, employees must consistently work 40 hours a week in order to maintain benefits. Failure to work 40 hours a week will result in loss of the insurance benefits.

After completion of all required paperwork, health care coverage for full time employees electing to take the health care insurance begins on the first day of the month following the completion of the first 180-consecutive days of employment and/or status change. Receipt of cards may be delayed due to processing time. Office employees will confirm coverage and make every effort to assist during this delay.

L.A.D.D., Inc. is bound by the rules and regulations under Federal Law Section 125. Under this rule employees can elect coverage only:

1. On the first day of the calendar month after they become eligible* to participate or;

begins a midnight shift the day before a holiday or the day of a holiday, they will receive holiday pay for that shift. (The exceptions to this rule are Christmas Eve and New Years Eve since the holiday does not begin until 3 p.m.)

DAYLIGHT SAVING TIME—An hourly employee working a midnight shift in which daylight savings time begins or ends will be paid for the actual hours worked. In the spring when the clock is moved forward one hour during the midnight shift, the employee who is working, for example 12 midnight to 8 a.m., will be paid for 7 hours. In the fall when the clock is moved back one hour and an employee is working, for example 12 midnight to 8 a.m., will be paid for 9 hours when the clock is moved back one hour.

FLEX-TIME

Flex-Time pay is available to hourly employees after the first 180 consecutive days of their employment. This allows employees to take time off and still receive pay, if they meet the Staffing Requirements and the Staffing Policy has been fulfilled.

Flex-Time will be accumulated in the following manner:

1. Employees will accumulate .04 hours of Flex-Time for every regular hour worked.
2. This accumulated Flex Time will be paid following the employee's annual anniversary date of employment for Flex Time hours not used during the course of the year.
3. Any hourly employee who gives and works a two-week notice prior to separating from L.A.D.D., Inc. or is removed from the schedule at L.A.D.D., Inc.'s., discretion during the notice period, will be paid any unused accumulated Flex-Time..
4. Employees who quit without a two-week notice are ineligible for payment of unused accumulated Flex-Time pay.
5. Employees separated from employment due to misconduct are ineligible for payment of unused accumulated Flex-Time pay.

Employees can use their Flex-Time for the following:

1. Absences for any reason, when an employee follows and fulfills the requirements under the Staffing Policy no matter the reason for the time off; i.e. personal time, illness, emergency, etc.
2. Absences when an employee is on an approved Family Medical Leave.

Use of Flex-Time for any other absence requires Management approval.

VACATION

Due to the nature of employment (24 hours/7 days per week), it is important that employees planning a vacation ask for the time off at least three weeks or more in advance for scheduling purposes and understand that a vacation is defined as 5 or more consecutive scheduled days off. In the event of a serious illness/emergency preventing an employee from fulfilling the Staffing Requirements, Management must be contacted immediately to find coverage.

BIRTHDAY PAY

Employees that have completed 180 consecutive days of employment with L.A.D.D., Inc. are eligible to receive birthday pay. The pay will equal 8 hours of regular pay and should be requested on the employee timecard. Please contact the Office if you do not receive your Birthday pay and you have met the criteria.

DEATH IN THE FAMILY- FUNERAL LEAVE

Full time employees are eligible for a maximum of 3 paid days off in the event of a death in the immediate family (spouse, parent, parent-in-law, child-in-law, sibling-in-law, child, stepchild, step-parent, step-sibling, grandparents, grandchild, sibling and any relative or significant other living in the same household). This benefit is calculated in the following way: starting with the day of the funeral and working back, if attending the funeral, L.A.D.D., Inc. will pay up to 8 hours per day for a 24-hour maximum for scheduled shifts missed during this period. For example, if the funeral is on Monday and the employee is not scheduled for work Saturday or Sunday, then only Monday is paid. If the 3 days off occur during a holiday period, employees are paid at the base rate only.

To be paid an employee must submit to Management appropriate documentation to verify the need for use. The employee must also document their request with payroll for funeral pay and the number of hours for which they qualify.

This policy is to be handled individually with Management. It is not designed to be restrictive. (This policy applies to only those employees who have completed the first 180 consecutive days of employment.) Flex-Time and Funeral Pay cannot be used for the same day. Flex-time can be used along with funeral pay if more time is needed for grieving with Management approval. Part time employees are able to use their flex time towards days off.

HEALTH AND SAFETY

EMPLOYEE HEALTH INFORMATION

After the Conditional Job Offer is made and prior to beginning employment, applicants will be drug screened and must provide L.A.D.D., Inc. with a record of a current physical examination. Other medical information may be required if it is job related or necessary for business. Employees needing an incoming physical will be sent to the company designated clinic. L.A.D.D., Inc. will not reimburse for physicals done by a non-designated clinic or doctor's office. At the time of the physical each employee must have a TB test, which must be read before working with any people served. If an employee is unable to get a TB skin test due to medical problems, a chest X-ray is required.

As part of the Job Essentials employees must complete and pass an Annual Health Review, attesting to the health status of the employee per licensing rule 400.14205, yearly and a TB Test or a Chest X-ray every 1-3 years depending on current requirements at the company designated clinics to remain employed. On recommendation from the Health Department we reserve the right to require the TB test annually.

Employees must have a TB test every 1-3 years depending on current requirements. It is the employee's responsibility to obtain the TB test. L.A.D.D., Inc. pays for tests done at the designated clinics. Failure to turn TB test results in on the due date could result in suspension until said TB test results are turned in to Management. If the employee fails to have the TB test viewed within the timeframe established by the designated clinic the employee is responsible for payment of a replacement TB test.

Hepatitis B vaccinations will be made available to all employees. If an employee initially declines the Hepatitis B vaccination but at a later date decides to accept, they should contact the Office. L.A.D.D., Inc. will pay for Hepatitis B vaccine for employees who choose to have it administered. An employee who chooses to receive the Hepatitis B vaccine and does not complete the required series may be responsible for the costs due to his/her failure to report timely and the series requested to be re-administered.

An employee who; following a medical examination, the administration of tests, or a reported illness/injury that prevents the employee from working one or more scheduled shifts, is found to have symptoms of a physical, emotional or mental condition could be affect the health or quality of the care to the people we serve or which prevents the employee from performing the duties of his or her employment, shall be relieved of his or her assignment. The employee may be required to furnish a medical clearance by a qualified physician before he or she will be permitted to return to work.

TRAINING

Required employees must attend training sessions. These sessions may be designed and taught by L.A.D.D., Inc., the Responsible Mental Health Agency (RMHA), and/or other qualified trainers.

All training is considered a scheduled shift; therefore mileage is not reimbursable. Employees will be paid for hours in attendance at scheduled training. Attendance at these meetings must be documented on the Signature Sheet provided at the training as well as on the employee timecard. Training occurring via computer will be paid at the pre-established hours listed on each training section with confirmation of completion. Successful completion of training is a requirement of continued employment. Training is a Job Essential requirement; thus refusal to attend or failure to pass will result in disciplinary action up to and including separation from employment or revoking of the conditional job offer if this is the initial training.

Required employees will be trained in emergency procedures, including fire evacuation, prior to beginning work. Mandatory reporting requirements, licensing administrative rules, cultural competency, Corporate Compliance, and HIPAA regulations will be trained at hire and as per contractual obligations. CPR and First Aid is required within 30 days of employment and then as required to continue certification. Employees who miss CPR or First Aid scheduled by L.A.D.D., Inc., will be required to obtain the missed training at their own expense and may be removed from the schedule until the training is completed. Training must be approved RMHA training verified with the Office/Human Resource Department.

Required employees will be trained within 10 days of hire and annually thereafter in OSHA guidelines/procedures, use of Personal Protection Equipment and communicable disease information. Employees are required to practice Universal Precautions at all times. Employees are responsible to regularly review the OSHA: Right to Know book, which contains Material Safety Data Sheets (MSDS) information about chemicals and materials found in the workplace and safe handling practices. The Licensee Designees and Administrator will meet the licensing requirement of 16 hours of training annually in Adult Foster Care approved trainings.

Required employees are trained in the following emergency procedures which are posted in the offices and are available in the L.A.D.D., Inc. Directory: (this list is non inclusive) General/Medical Emergencies, Fire Evacuation, Missing Person, Tornado, In Case of Death, Severe Weather/Snow Emergency, Power Failure, Incidents and Accidents, Bomb Threat/National Emergency, Alternative Housing, Emergency Procedures/Responsible Persons, Duty to Warn, Hostage, Medication Error, Death of the Individual, Fire Alarm Failure Chart and Procedure.

All employees are required at all times to correctly follow all training.

WORKPLACE VIOLENCE

L.A.D.D., Inc. has a “zero tolerance” policy on violence in the workplace. Employees are required to refrain from engaging in acts of physical violence or acts of harassment.

Any employee who is found to have engaged in violence or harassment in the workplace or while on the job may be subject to disciplinary action, Recipient Rights investigation, criminal prosecution, and/or disciplinary action up to and including separation from employment.

Workplace violence, for the purposes of this policy, means engaging in conduct either in person, by telephone, or in writing, including electronic communication, directed at a specific person, (either a co-worker or member of the public with whom the individual comes into contact through his or her employment) which seriously alarms, frightens or distresses the person or which would cause a reasonable person to be seriously alarmed, frightened, or distressed.

If it is believed that an employee has engaged in an act of violence or is likely to engage in an act of violence, this must be reported immediately to Management and the employee needs to follow the chain of command until the complaint has been resolved. Management then has the following obligation:

1. Protect, comfort and insure the safety of the employee.
2. Investigate the situation, including discussions with both parties.
3. Make a judgment about the seriousness of the allegation.
4. Seek counsel when needed.
5. Recommend appropriate action to correct the problem.

Employees who have been threatened or believe that a threat has occurred must immediately report such incidents. In no event should reporting to Management exceed 10 days from the alleged occurrence. Reports can be made without fear of negative consequence for the reporting employee based on the issuing of a complaint. Any employee who violates this policy will be subject to disciplinary action up to and including separation from employment.

WORKPLACE HEALTH AND SAFETY

L.A.D.D., Inc. is required to insure that employees are free from communicable disease, and physical or mental conditions that would negatively affect the people who receive support services.

Any medical or health issues which could pose a direct threat and result in a significant risk or substantial harm must be discussed with Management. L.A.D.D., Inc. reserves the right to request medical evaluations including drug screen/test, at L.A.D.D., Inc.’s expense, when it appears an employee has a condition that is potentially dangerous or that may interfere with the employee’s performance of job duties. Failure to comply with the direction given by Management to obtain a medical evaluation, including a drug screen, will be considered a voluntary separation from employment.

Employees are responsible to notify Management if they are using a medication that may impair their ability to perform their job (i.e., impaired judgment, causes drowsiness, causes driving restrictions, etc.) See Drug Policy in this handbook.

WORKERS’ COMPENSATION AND INJURY

Employees are insured under the State of Michigan’s Workers Compensation laws covering injuries resulting from work performed while on duty. If, according to the doctor, an employee can return to work during that same shift, L.A.D.D., Inc. expects each employee to return to work as soon as possible. If, according to the doctor, the employee cannot return to work, they will suffer no loss in pay for the balance of that shift, and the employee needs to document their hours.

State law determines payment for medical expenses and time lost at work. Workers compensation provides death benefits for dependents (if any) in the event of a work related death. L.A.D.D., Inc. pays the full cost of this protection. (See Accident/Injury for details for work place accident/injury.)

ACCIDENT/INJURY

Safety is everyone's responsibility. Employees must report any unsafe conditions or circumstances to Management to prevent accidents. Job-related injuries or illnesses must be reported immediately. In the event of an employee injury or accident, please refer to the following procedure:

1. If emergency medical attention is needed, the employee or nearest bystander should call 911 and begin first aid if needed.
2. If non-emergent medical attention is required, employees must see the L.A.D.D., Inc. designated physician, clinic or hospital. Management must be contacted to insure the employee receives treatment from the designated clinic. If all designated clinics are closed or treatment is urgent, Management may approve treatment at the closest hospital emergency room. Failure to receive Management approval for treatment outside of the designated clinic may result in the employee being held responsible for the expense of treatment.
3. All incidents/accidents must be reported in writing via the Accident/Injury Report to L.A.D.D., Inc. Management within 24 hours of the incident on the Accident Injury Report or disciplinary action may occur.

4. The Accident/Injury Report must be filled out by injured employee signed by Management. If medical attention is not needed, the employee must still report the incident to Management and complete an Injury/Accident report.
5. Employees reporting an injury/accident at work and seeking medical attention for this injury/accident will be required to take a drug/alcohol test upon arrival at the designated clinic. Positive drug screen/test will result in separation from employment and non-payment for time lost on the job.
6. Management will fax the Injury/Accident report, physician's report and employee work status to the Office by the next business day.
7. The injury/accident will be entered on the OSHA 300 form by Management (if applicable). An Occupational Occurrence Form (located in the OSHA Exposure Plan book) must be filled out and sent to the Office if there was an exposure incident. Management must write recommendations and/or provide counseling to the employee after the injury has been treated. An accident that results in death of an employee must be reported to OSHA within 8 hours.
8. Additional training will be provided before the employee returns to work if applicable.
9. Emergency contacts will be notified in the event of serious injury such as loss of consciousness, or at the request of the employee.

Employees will use the designated clinics available to assist them in the event of an emergency. The clinic should be contacted directly if indicated by circumstances or if information is needed regarding the need for treatment.

TRANSPORTATION SERVICES: POLICY FOR EMPLOYEES AND DRIVERS

Employees/Drivers of L.A.D.D., Inc.'s vehicles, or employees using their own vehicle to conduct business for L.A.D.D., Inc., shall have a valid driver's license or chauffeur's license as required by law, be insurable under L.A.D.D., Inc.'s automobile insurance policy; or when using their own vehicle, have proper and adequate automobile insurance, and meet other criteria defined below. **Employees are responsible to report to Management immediately if the status of their driver's license changes at anytime during employment with L.A.D.D., Inc.** At that time, L.A.D.D., Inc. will review the circumstances on an individual basis. Failure to report a change of driver's license status will result in immediate separation from employment. We expect honest employees who stand in truth.

This policy applies to any individual who may be required to drive a L.A.D.D., Inc. vehicle, including use in emergency situations, or who use their own vehicle to conduct business for L.A.D.D., Inc.

1. After a Conditional Job Offer has been made, all employees working in positions who are required to drive must furnish L.A.D.D., Inc. with a copy of their valid driver's license. At that time L.A.D.D., Inc. will run a MVR (Motor Vehicle Report). Failure to meet the insurability requirements will result in withdrawal of the Conditional Job Offer.
2. During employment L.A.D.D., Inc. will request a copy of a valid driver's license at least one time per year from employees working in positions who are required to drive. Maintaining a valid driver's license and a MVR that meets insurability requirements is a Job Essential for specific positions and therefore required to continue employment. L.A.D.D., Inc. reserves the right to review driving records at any time.
3. All employees requiring a valid driver's license will complete a driving test during the training period and L.A.D.D., Inc. reserves the right to periodically run MVR's and/or conduct unannounced driving tests. If problems related to proper driving are reported or confirmed, action up to and including separation from employment could occur.
4. If an employee's driving record reveals violations that are unacceptable, considered a threat to safety and uninsurable, they will not be permitted to drive L.A.D.D., Inc. vehicles or use their own vehicles for company purposes. The employee's specific situation must be reviewed by Management to decide if employment will continue.
5. If at any time during employment the status of an employee's driver's license changes, the employee may be removed from the schedule pending review of the driving record by Management. Depending on the specific circumstances, a specified time frame may be given to the employee for them to regain their valid driver's license and meet the Job Essentials.
6. If the employee is unable to regain a valid driver's license in that time frame, they will be asked to reapply for employment upon receiving a valid driver's license as a condition for returning to work. During this time frame, the employee may remain on the schedule at Management's discretion (i.e. if able to schedule with a fully trained employee and no AFC licensing restrictions).
7. Management and the employee will complete documentation that specifies the timeframe the employee has to regain a valid driver license, driving restrictions during that timeframe and consent of the employee for management to divulge to co-workers the employee's driving status including putting the restricted status on the posted schedule and informing other managers of the restricted status in the event the employee works at another location temporarily.
8. If an employee becomes unable to drive or is inflicted with a mental or physical infirmity, they will not be permitted to drive L.A.D.D., Inc.'s vehicles, provided such disability constitutes a direct threat to public safety. Evaluation of competency or ability will be determined by appropriate medical opinion.
9. All employees must have the legally required insurance on their own vehicle and must provide a copy of insurance for personnel records if they use their own vehicle on a routine basis for transportation of the people served.
10. Motor vehicle driving records will remain as part of the personnel file.
11. Any employee that has worked more than 16 hours consecutively on the schedule cannot drive the L.A.D.D., Inc. vehicle. Employees must request a ride home if they feel too tired to drive.

12. Eating, drinking and smoking in any L.A.D.D., Inc. vehicle is prohibited, regardless of whether the vehicle is moving or standing. (This includes all food items, liquids, suckers, hard candy, etc.)
13. Use of cell phones or other electronic equipment that detracts from driving while driving is prohibited, except in emergencies. Any activity as described as Distracted Driving in any applicable Law, which includes texting, is prohibited.
14. All L.A.D.D., Inc. vehicles must be locked when not in use.
15. Employees are responsible to report any vehicle maintenance needs immediately to insure safe vehicles.
16. All employees requiring a valid driver's license must advise L.A.D.D., Inc. of any traffic tickets accidents or other citations involving an automobile in which they are found to be responsible, at fault or guilty.
17. L.A.D.D., Inc. vehicles are to be used only for transportation of the people who receive support services or to carry out L.A.D.D., Inc. business.
18. Employees should always use the L.A.D.D., Inc. vehicle when on company business unless otherwise pre-approved by Management. Following approval, employees will be reimbursed at the current L.A.D.D., Inc. reimbursement rate when driving their own vehicle. Employees must request mileage on the Employee Timecard for that pay period in which the mileage was accumulated and insure they kept within any designated limits.
19. All occupants in any vehicle shall be properly restrained in seatbelts. Wheelchair occupants must face forward be properly secured in their wheelchair, wheelchair brakes on and wear a safety belt. Employees must insure that tie-downs are secure. .

L.A.D.D., Inc. reserves the rights to modify, add to, or delete from this policy as determined solely by L.A.D.D., Inc.

GENERAL MAINTENANCE OF PROGRAM

It is expected that the appearance of the program or location will be maintained to the standards set forth by L.A.D.D., Inc. Small things can mean a great deal (i.e., trash in the yard, a cluttered porch, etc.). The men/women who receive support services from L.A.D.D., Inc. have a right to a safe, clean environment. Also, it is important to remember that the community will, in part, judge the person's home and the people who live there on appearance.

As part of the job, employees are responsible for the upkeep and routine home maintenance as it relates to health, safety and care of the people served. This includes, but is not limited to, shoveling sidewalks, sweeping, removing garbage, cleaning home and van, etc.

All employees are responsible to report in writing to management any maintenance needs and/or safety concerns. If a safety concern is not addressed in a timely manner, the employee needs to report this to the Corporate Compliance Officer.

Employees must follow the lockout/tag out procedures for electrical usages as outlined in the Emergency Procedures Packet.

EMPLOYMENT EXPECTATIONS

ACCEPTANCE OF GIFTS AND LOANS

L.A.D.D., Inc. provides supports to vulnerable people; and therefore must insure at all times that care is never influenced or could appear to be influenced by gifts, money or favors, etc. It must be made clear that L.A.D.D., Inc. decisions are made solely for the benefit of the people served. It must also be made clear that compensation (of any type) to employees is only made from L.A.D.D., Inc. employer to employee. Therefore, to avoid any appearance of undue influence, protect the integrity of our employees and insure unbiased care of the people we support, employees are responsible to direct anyone wanting to give a gift to Corporate Compliance.

Employees are not permitted to borrow money from or loan money to the people who receive support services from L.A.D.D., Inc. or members of their family under any circumstances. Employees are not to co-mingle funds (i.e. combine person's supported money with employees' money). Michigan law makes any violation of this policy a misdemeanor with the possibility of a two-year imprisonment, a \$25,000 fine or both if convicted. Failure to follow this policy will result in disciplinary action up to and including separation from employment.

SOLICITATION POLICY

In the interest of efficiency and for everyone's protection, L.A.D.D., Inc. has adopted the following policy concerning solicitation by employees and non-employees:

1. The distribution of written material by employees or non-employees during work hours in work areas is prohibited. (Written material includes, but is not limited to pamphlets, booklets, newsletter and handbills.)
2. Verbal or written solicitation by employees or non-employees enjoining members to join, enlist or in any way become a part of any organization during work hours in work areas is prohibited. Organizations include, but are not limited to those generally defined as fraternal, social, religious or political.
3. Solicitation and distribution of materials or literature by non-employees on employer premises is expressly prohibited at all times. Please refer unauthorized persons to Corporate Compliance.
4. Administrative staff may approve certain fund-raising events. See Fund Raising Policy for additional guidelines available in the L.A.D.D. Directory or on the website.

5. Employees are not allowed to sell items (i.e. Avon, etc.) to the people we serve.
 6. Solicitation facilitated through telephone or electronic communication systems; other solicitations through L.A.D.D., Inc. telephone or computer/electronic systems are prohibited
- Violation of this policy will result in disciplinary action up to and including separation of employment.

APPROPRIATE CLOTHING

All employees should be constantly aware that they act as role models for the people we serve and as a reflection of our organization. Therefore, employees are expected to arrive for work adhering to commonly accepted standards of hygiene, cleanliness, grooming and conservative wardrobe. Employees may also be asked to wear looser fitting and less revealing clothing based on the needs of the people being served. Employee's appearance reflects not only on them as an individual, but on L.A.D.D., Inc. and the people we support as well. As part of employee performance it is expected that employees take pride in their appearance and strive to achieve a positive business-like image when representing the company. Employees are expected to dress in a manner to reflect the nature of their current position and to reflect the activities in which they are engaged. Dress in the community or when interacting with individuals from outside agencies should be upgraded from what an employee may wear when working doing direct services in a program.

Due to the nature of our work, it is important that employees limit personal accessories; jewelry, body piercing or fragrances/odors. These items should not compromise health, sanitation or safety. Wearing of these items is at an employee's own risk, including replacement value. Additional items of personal style, such as long fingernails, that interfere with the welfare and safety of the people we serve will be restricted. Employees may be asked to cover or remove earrings, stud or items that may put the employee or the person served at risk for harm. Employees are not allowed to work with bare feet. Rubber soled shoes are encouraged. Management reserves the right to require a specific dress code based on the needs of the job.

CELL/TELEPHONE COMMUNICATION POLICY

Telephones are in the program for the personal use of the people who reside there and daily operations and cell phones in the vehicles for emergency purposes. The following is the cell/telephone usage procedure:

1. An employee's primary duty while on shift is the safety and well being of the people served. Cell/Telephone calls, texting or use of any other communication devices must not interfere with this duty.
2. If at any time, communication devices do interfere with an employee's primary duty; use will be restricted by Management. This may include excessive calls, texting, etc.
3. Employees must keep personal calls to a minimum. Personal calls must not exceed 3 minutes or interfere with the safety and well being of the people served. Long distance calls are prohibited. Home telephone numbers or cell phone numbers should never be given out except to current employees of L.A.D.D., Inc.
4. Numerous interruptions at work and/or over use of cell phones may result in Management prohibiting the cell phone at the work location.
5. Excessive phone/electronic device usage or phone calls over 3 minutes are considered a violation of the rights of the people served and disciplinary action up to and including separation from employment may occur.

MEDIA RELEASES

Due to confidentiality requirements and HIPAA Regulations employees are not allowed to release any information to anyone not listed on a HIPAA Disclosure Authorization including news reporters, newspapers, etc. All immediate inquiries whether verbal or written should be designated to Corporate Compliance or Administration and should be handled with the utmost professionalism. No members of the media should be allowed into the program or office without the express approval of Corporate Compliance or the Administrative staff.

VISITATION

All visitors to programs must have proper identification, that it is verified, and the visitor signs in (including outside agencies, third party contractors, etc.) A Visitor's Log will be maintained. Administrative staff must approve all visitors other than the relatives of the people who receive services or regulatory agency employees. Employees will not allow anyone in the program, whom they are not expecting and do not recognize, without checking identification. Natural supports must have proper authorization in place. Due to confidentiality requirements and HIPAA Regulations employees are not allowed to release any protected health information to anyone not listed on a HIPAA Disclosure Authorization. Visits are expected to occur during hours considered reasonable for the people and the place where they live.

Employees may not have visitors to the program without prior Management approval. Children may be welcome in the program for short periods of time if the people served would like them to visit and provided an adult, not on shift, is accompanying them and Management approves the visit. Otherwise, children are prohibited from visiting the program. Having visitors must never detract from the care, welfare and safety of the people receiving support services. Employees must never have visitors or children at their work location if an individual there has engaged in or may engage in challenging or aggressive behaviors.

INSPECTION OF CONTAINERS AND PACKAGES

L.A.D.D., Inc. reserves the right to inspect all containers and packages entering or leaving the premises such as handbags, backpacks, boxes, bags, computer bags, lunch buckets, briefcases, smart phones etc. at all L.A.D.D., Inc. locations, if deemed necessary.

CRIMINAL CONVICTIONS AND CRIMINAL CHARGES

Employees who are convicted of a felony, a serious misdemeanor or any other serious crime, the nature of which implies that the employee is incapable of meeting the Good Moral Character standards, are subject to separation from employment. An employee who is charged with a crime may be subject to suspension without pay until the charge is resolved. If the charge is not conclusively resolved in the court system, L.A.D.D., Inc. reserves the right to separate from employment or alter that employee's employment. In addition, if the employee is determined not to be guilty but trial publicity or knowledge among co-workers is such as to create a negative atmosphere, L.A.D.D., Inc. reserves the right to separate the employee.

L.A.D.D., Inc. reserves the right to randomly, annually or at any time run criminal history checks on all employees. If convictions are discovered during the criminal history check, appropriate action up to and including separation from employment will be taken at that time. Any employee aware of criminal convictions and/or pending convictions of an L.A.D.D., Inc. employee must report these allegations to Management. Reports can be made anonymously.

VOLUNTEERS

Volunteers must be at least 18 years of age, of good moral character, free from communicable disease, and free of physical/mental health that would negatively affect the people we support. Also, they will be required to furnish three references, as well as meet all licensing and certification requirements. Volunteers must be supervised at all times by an L.A.D.D., Inc. employee. Volunteers may not be used to replace regular employees at any time. Volunteers may not dispense medication or implement structured interactions. The Administrative staff must approve all volunteers.

RELIGION

It is policy of L.A.D.D., Inc. to allow the expression of religious practices. However, due to the nature of the job, employees may be asked to work any day or hours of the week including holidays. The people we support have a multitude of religious affiliations; therefore L.A.D.D., Inc. safeguards their beliefs by insuring that employees do not impose their own particular religious beliefs on others.

SMOKING

Smoking is prohibited in the workplace including on the premises unless a designated area is expressly established by L.A.D.D., Inc. By law, the people we serve are entitled to mental health support services suited to his/her condition and to a safe, sanitary and humane living environment.

Therefore, it is the policy of L.A.D.D., Inc. that smoking is prohibited inside the programs, offices and L.A.D.D., Inc. vehicles. Smoking is permitted only in designated areas, which are at a minimum 25 feet from any entrance, outside of the programs or offices, if permitted at all for that service. Some services provided may require no smoking at any time.

Smoking is prohibited around the people we serve and especially those less than 18 years of age. Employees' primary duty is the care of the people receiving supports; therefore smoking should never interfere with people's care. Only one employee at a time should be outside smoking, if allowed at that program. Metal containers must be used to dispose of cigarette butts. The complete Smoking Policy is located in the LADD Directory or on the website. Failure to abide by this policy may result in loss of smoking privileges. All employees share in the responsibility for adhering to and abiding by this policy. Any person who witnesses a violation to this policy should bring it to the attention of the offending party and seek a voluntary resolution.

OUTSIDE EMPLOYMENT

L.A.D.D., Inc. reserves the right to restrict outside employment that creates a real or potential conflict of interest. Outside employment will be restricted in those situations in which the outside employment competes directly with L.A.D.D., Inc.'s interest in providing quality care to people served where the other employment is a competitor or L.A.D.D., Inc. or when the employee cannot work regular hours due to a conflict in schedules between jobs. Due to the 24 hour-on-call job essential required by Management, outside employment will be reviewed to insure that all aspects of the Job Description/ Essentials can be fulfilled. Management is required to submit their review to the Administrator.

L.A.D.D., Inc. assumes no responsibility for outside employment. Injuries that are incurred during outside employment are not covered by L.A.D.D., Inc.'s worker's compensation insurance.

SUGGESTIONS

L.A.D.D., Inc. Management welcomes and encourages suggestions and values open communication at all levels. This is how we are able to continuously improve our services. Employees may also observe problems, have complaints, issues or suggestions that, when expressed, will offer an improved workplace. This may include methods to improve productivity or the need for policy clarification. It is the hope of L.A.D.D., Inc. that employees will feel free to offer ideas to improve operations. Such suggestions can be made to any member of Management, but should begin with that member most involved in the issue. Suggestion Boxes are available. If an employee at any time does not feel that they are able to give suggestions, they need to inform the appropriate level of Management and/or the Corporate Compliance Officer so that we can insure that ALL employees are able to communicate in an honest, open, respectful manner with any other employee no matter their job title.

MEDICAL RESTRICTIONS

Upon learning of a medical restriction an employee must take a copy of the Medical Clearance Form to a licensed medical doctor for review, signature, and return it within the deadline given. (For work-related injuries see the Worker's Compensation section.)

The employee then needs to submit a letter/Medical Clearance Form from the doctor stating:

1. Any part of the job (based on the review of Medical Clearance) that cannot be performed.
2. Any limitations that are to be placed.
3. If lifting restrictions, how many pounds the employee can lift.
4. Any complications that could affect the ability to do the job.
5. Length of time of restriction(s).

If an employee verbally reports medical restrictions before submitting to Management a written statement regarding limitations from a doctor, it will result in removal from the schedule until a statement from a doctor is submitted. The Job Restriction Form must be completed and reviewed with Management. L.A.D.D., Inc. reserves the right to review accommodations and grant or refuse accommodations based on the reasonableness of the accommodation. Accommodations may be refused, if in the opinion of Administrative staff they place an unfair burden on the people receiving supports. L.A.D.D., Inc. reserves the right to transfer employees with medical restrictions if, in the opinion of L.A.D.D., Inc., they feel it is necessary to insure the employee's safety or the safety of the people served. L.A.D.D., Inc. is under no obligation to create a position to accommodate an employee with medical restrictions.

FAMILY AND MEDICAL LEAVE OF ABSENCE (FMLA)

BASIC LEAVE ENTITLEMENT

FMLA requires covered employers to provide up to 12 weeks of unpaid, job-protected leave to eligible employees for the following reasons:

1. For incapacity due to pregnancy, prenatal medical care or child birth;
2. To care for the employee's child after birth, or placement for adoption or foster care;
3. To care for the employee's spouse, son or daughter, or parent, who has a serious health condition; or
4. For a serious health condition that makes the employee unable to perform the employee's job.

For the birth of a son or daughter of an Employee and to care for the newborn child or because of the placement of a son or daughter with the Employee for adoption or foster care, the Employee's entitlement to family medical leave expires at the end of the 12-month period beginning on the date of the birth or placement.

For purposes of complying with this federal law, L.A.D.D., Inc. has adopted the following method to determine when the 12-month period shall begin and end. The 12-month period is measured forward from the date the Employee first commenced an FMLA leave. For example, if an Employee left on his or her first FMLA leave on February 1, 2001, he or she is eligible again on February 1, 2002.

MILITARY FAMILY LEAVE ENTITLEMENTS

Eligible employees with a spouse, son, daughter, or parent on active duty or call to active duty status in the National Guard or Reserves in support of a contingency operation may use their 12-week leave entitlement to address certain qualifying exigencies. Qualifying exigencies may include attending certain military events, arranging for alternative childcare, addressing certain financial and legal arrangements, attending certain counseling sessions, and attending post-deployment reintegration briefings.

FMLA also includes a special leave entitlement that permits eligible employees to take up to 26 weeks of leave to care for a covered service member during a single 12-month period. A covered service member is a current member of the Armed Forces, including a member of the National Guard or Reserves, who has a serious injury or illness incurred in the line of duty on active duty that may render the service member medically unfit to perform his or her duties for which the service member is undergoing medical treatment, recuperation, or therapy; or is in outpatient status; or is on the temporary disability retired list.

BENEFITS AND PROTECTIONS

During FMLA leave, L.A.D.D., Inc. must maintain the employee's health coverage under any "group health plan" on the same terms as if the employee had continued to work. Upon return from FMLA leave, most employees must be restored to their original or equivalent positions with equivalent pay, benefits, and other employment terms.

Upon return from family medical leave, an Employee is entitled to be returned to the same position the Employee held when leave commenced, or to an equivalent position with equivalent benefits, pay and other terms and conditions of employment.

Key Employees may not be entitled to reinstatement rights. By definition, a key Employee is among the 10% highest paid Employees employed by the Employer within 75 miles of the Employee's work site.

The denial of key Employee restoration rights is allowed where substantial and grievous economic injury to the operations of L.A.D.D., Inc. may result. The determination of whether a key Employee status exists will be made at the time the request for family medical leave is made.

Use of FMLA leave cannot result in the loss of any employment benefit that accrued prior to the start of an employee's leave.

While an Employee is on family medical leave, L.A.D.D., Inc. will continue to maintain existing group health plan coverage. In the event that the health plan or benefits change, L.A.D.D., Inc. will notify the Employee of the new or changed benefits.

Any share of health plan premiums which have been paid by the Employee prior to family medical leave will continue to be paid by the Employee during the family medical leave period. Thus, payment would be due at the same time as it would be made if by payroll deduction.

The Employee's failure to pay his or her portion of any health insurance premium may result in loss of coverage while on family medical leave. Under the FMLA L.A.D.D., Inc. may at its discretion, pay the Employee's share of any missed premiums. Should this occur, L.A.D.D., Inc. will recover this amount from the Employee upon his or her return to work. If coverage lapses due to non-payment, restoration of all coverage's and benefits will begin upon return to work. This restoration will be equivalent to those coverage's that the Employee would have had if leave had not been taken and the premium payment had not been missed.

L.A.D.D., Inc. also reserves the right to recover its share of health plan premiums paid during a period of unpaid family medical leave from an Employee if the Employee fails to return to work after the Employee's family medical leave entitlement has been exhausted or expires, unless the reason the Employee does not return is due to:

1. The continuation, reoccurrence, or onset of a serious health condition which would entitle the Employee to leave under Family and Medical Leave; or
2. Other circumstances beyond the Employee's control.

ELIGIBILITY REQUIREMENTS

Employees are eligible if they have worked for a covered employer for at least one year, for 1,250 hours over the previous 12 months, and if at least 50 employees are employed by L.A.D.D., Inc. within 75 miles.

Bona fide executive, administrative or professional employees who have worked for L.A.D.D., Inc. for at least 12 months will be presumed to have worked 1,250 hours during the previous 12 months. The determination of eligibility for the Family and Medical Leave Act is made at the time that the Employee's leave would begin.

Definition of Serious Health Condition

A serious health condition is an illness, injury, impairment, or physical or mental condition that involves either an overnight stay in a medical care facility, or continuing treatment by a health care provider for a condition that either prevents the employee from performing the functions of the employee's job, or prevents the qualified family member from participating in school or other daily activities.

Subject to certain conditions, the continuing treatment requirement may be met by a period of incapacity of more than 3 consecutive calendar days combined with at least two visits to a health care provider or one visit and a regimen of continuing treatment, or incapacity due to pregnancy, or incapacity due to a chronic condition. Other conditions may meet the definition of continuing treatment.

USE OF LEAVE

An employee does not need to use this leave entitlement in one block. Leave can be taken intermittently or on a reduced leave schedule when medically necessary. Employees must make reasonable efforts to schedule leave for planned medical treatment so

as not to unduly disrupt the employer's operations. Leave due to qualifying exigencies may also be taken on an intermittent Employees must take any accrued Flex-Time while taking FMLA leave.

EMPLOYEE RESPONSIBILITIES

Employees must provide 30 days advance notice of the need to take FMLA leave when the need is foreseeable. When 30 days notice is not possible, the employee must provide notice as soon as practicable and generally must comply with an employer's normal call-in procedures.

Employees must provide sufficient information for L.A.D.D., Inc. to determine if the leave may qualify for FMLA protection and the anticipated timing and duration of the leave. Sufficient information may include that the employee is unable to perform job functions; the family member is unable to perform daily activities, the need for hospitalization or continuing treatment by a health care provider, or circumstances supporting the need for military family leave. Employees also must inform L.A.D.D., Inc. if the requested leave is for a reason for which FMLA leave was previously taken or certified. Employees also may be required to provide a certification and periodic recertification supporting the need for leave.

EMPLOYER RESPONSIBILITIES

Covered employers must inform employees requesting leave whether they are eligible under FMLA. If they are, the notice must specify any additional information required as well as the employees' rights and responsibilities. If they are not eligible, L.A.D.D., Inc. must provide a reason for the ineligibility.

Covered employers must inform employees if leave will be designated as FMLA protected and the amount of leave counted against the employee's leave entitlement. If L.A.D.D., Inc. determines that the leave is not FMLA-protected, L.A.D.D., Inc. must notify the employee.

Once an Employee makes a request for family medical leave, L.A.D.D., Inc. will provide specific notice including but not limited to the following:

1. That the leave will be counted against his or her annual family medical leave entitlement;
2. Any requirements for the Employee to furnish medical certification of a serious health condition and the consequence of failing to do so;
3. The Employee's right to substitute paid leave and whether L.A.D.D., Inc. will require the substitution of paid leave and the conditions related to any substitution;
4. Any requirement for the Employee to make any premium payments to maintain health benefits and the arrangements for making such payments;
5. Any requirement for the Employee to present a fitness for duty certificate to be restored to employment;
6. The status as a key Employee, if applicable, and potential consequence that restoration may be denied following family medical leave;
7. The Employee's right to restoration to the same or an equivalent job on the return from leave;
8. The Employee's potential liability for payment of health insurance premiums paid by L.A.D.D., Inc. during the Employee's unpaid family medical leave if the Employee fails to return to work after taking family medical leave; and
9. The notice may include other information such as whether L.A.D.D., Inc. will require periodic reports of the Employee's status of intent to return to work.

FACILITY AND MISCELLANEOUS

REVIEW OF LICENSING RULES

Public Act 218 that provides for the licensing and regulation of adult foster care facilities is available in the L.A.D.D., Inc. Directory in those programs licensed by the State of Michigan. These regulations are available for review by employees, people served, Legal Representatives and visitors. The AFC Licensing Rules provide standards and rules for group homes. Employees working in these programs must follow these rules to remain employed. Mandatory reporting requirements are also posted and available for review in these programs.

PRE-EMPLOYMENT RELEASE FOR VIDEOTAPING/PICTURE/PHOTOS OF EMPLOYEES DURING EXECUTION OF JOB DESCRIPTION AND RELATED DUTIES

L.A.D.D., Inc. assumes a progressive approach to providing support services. This means that video, audio equipment and/or photographs, with authorization to do so, may be used to record interactions with the people receiving services to monitor safety and/or to help communicate with people served for use as educational, instructional and service oriented opportunities for the employees to learn from these interactions. The use of these recordings are for viewing actual interactions with people with serve to help the person served be as independent as possible. Employees and persons served/guardians will be asked to sign a separate release if they would like their picture included on the L.A.D.D., Inc. Website. Employees also receive an L.A.D.D. photo I.D., identification card, upon employment for use in the community when necessary.

EMPLOYEE TRAINING MEETINGS

Employees are required to attend regular training meetings. These trainings are considered a scheduled shift and are compensated at the normal rate of pay. If attendance at training results in more than 40 hours worked in one week, employees will be compensated at the appropriate overtime rate of pay. Employees must call in advance when unable to attend a scheduled training/meeting and ask Management to be excused. Failure to attend training/meetings may result in disciplinary action up to and including separation from employment.

HOUSE KEYS AND IDENTIFICATION CARDS

Employees will receive L.A.D.D., Inc. identification cards within 30 days of employment. Employees may receive a key to the program where they are employed. Loss of the key or failure to return the key will result in a \$50.00 charge to cover the replacement of locks. Upon separation of employment, either voluntary or otherwise, the identification card and key must be returned to L.A.D.D., Inc. Use of these items is only for employment purposes.

PETTY CASH /EMPLOYEE RESPONSIBILITY OF FUNDS

A small amount of petty cash may be kept in the programs or office. The money will be kept in a locked and secured area. Management is responsible for supervising the expenditures of petty cash. Each time L.A.D.D., Inc. funds are used employees must sign the money out, and/or sign a receipt and the transaction is recorded in the Petty Cash Records Book. Administration supervises and reviews all petty cash expenditures. Any employee handling L.A.D.D., Inc. funds or personal funds of the people served is responsible to make appropriate purchases and account for all funds with receipts and change. Receipts must be cosigned. If a receipt is not turned in, it will have to be considered a personal purchase and/or donation. Any funds not accounted for are the responsibility of the employee to replace. Any misuse of funds must be reported immediately to Corporate Compliance. Misuse of funds may also be reported to Office of Recipient Rights, Licensing, and the Police. Employees need to be aware that any misuse of vulnerable people's funds may be punishable by fines and jail time. Immediate separation will occur for inappropriate/misuse of funds, stealing, etc. L.A.D.D., Inc. requires honest employees who do not steal from the people receiving services and/or their employer.

CLOSING

As stated throughout the Handbook/Code of Conduct the material contained within is to serve as an outline of the employee policies and practices in effect at L.A.D.D., Inc. It is the employee's responsibilities, obligations and duties while employed by L.A.D.D., Inc. to follow and ask for clarification or additional training when needed. Every effort has been made to make the information clear and understandable. If at any time further information or guidance is needed by an employee it is the responsibility of the employee to follow the chain of command and make inquiries until they fully understand the information.

All Management and Administration contact information is listed on the website and the Responsible Person List located in the programs. This allows employees to have the opportunity to ask for clarification of information at any time.

Thank you for being a part of the L.A.D.D., Inc. Team and MAKING THE DIFFERENCE!!!

ADDITIONAL REVISED POLICY/PROCEDURE EFFECTIVE 8/8/14 HANDBOOK V1.2

SOCIAL MEDIA POLICY

PURPOSE

To provide practical guidance for social media communications that aligns with the L.A.D.D., Inc. Mission, Vision and Values. Establish enforceable guidelines for employees to conduct social media engagement in both official and unofficial capacities that promotes a safe environment for sharing subject matter expertise, assisting stakeholders in the event of a crisis such as a disaster or emergency situation and protection from violation of applicable regulations or laws.

SCOPE:

This policy applies to all individuals employed by L.A.D.D., Inc.

POLICY

It is the policy of L.A.D.D., Inc. to establish a framework for employees to make responsible decisions about their use of social media in or outside of work so that employee's performance, the performance of others and L.A.D.D., Inc. business interests are not negatively affected. At the same time it is understood that L.A.D.D., Inc. fully respects the legal rights of our employees

including their rights under the National Labor Relations Board to engage in concerted and protected activities, and any part of this policy which interferes with the legal rights of our employees will not be enforced.

DEFINITIONS

Social Media – includes but is not limited to, all means of communicating or posting information or content of any sort on the Internet, including the following forums: blogs, podcasts, discussion boards, on-line collaborative information and publishing systems that are accessible to internal and external audiences (i.e., wikis), RSS feeds, video sharing, personal websites, and social networks such as but not limited to Facebook, Twitter, and Instagram.

PROCEDURE:

L.A.D.D. Inc. recognizes the use of various online communities and the need to outline the expectations and responsibilities of employees' use of social media networks and internet-based communications. Such communications may include, but are not limited to accessing, using, posting, publishing, or monitoring online sites, forums, blogs, wikis, or video logs (e.g., Facebook, Twitter, LinkedIn, MySpace, YouTube, blogs, media sites and other similar online venues). The purpose of this policy is not to restrict an employee's protected activities under Section 7 of the National Labor Relations Act.

1. While it is each individual's decision whether or not to use social media networks, employees should always be aware that their behavior and opinions may reflect on L.A.D.D., Inc.
2. Social media networking and internet-based communications by employees should be consistent with applicable laws and L.A.D.D., Inc. policy.
3. Employees shall not publish, discuss or reference confidential information about any person receiving services including health information or information otherwise protected by HIPAA. This includes a person's name, photographs, diagnostic testing results and images, case information, or any information that may lead a reasonable person to be able to identify a person supported.
4. Employee communications on social media networks or online communications should not contain information that identifies a person served identity or condition.
5. Employees shall respect the privacy rights of other employees, person's supported, contract agency and people in the community of L.A.D.D., Inc. by refraining from writing about or sharing information that may be considered a breach of privacy or confidentiality. Employees shall not publish, post, or discuss other people's personal information.
6. Employees have a right to their personal privacy. They have the right to keep their personal opinions, beliefs, thoughts and emotions private. Employees are prohibited from sharing anything via social media channels that could violate another employee's right to personal privacy.
7. Employee communications must not contain L.A.D.D., Inc. confidential, proprietary or trade secret information. This includes information about trademarks, sales, financial information, number of employees, salaries, person supported information and data, L.A.D.D., Inc. strategy and financial information, information provided to L.A.D.D., Inc. by third parties, or any other information that has not been publicly released by L.A.D.D., Inc. These are examples only and do not cover the full range of information that may be considered confidential and proprietary. Employees should refrain from using L.A.D.D., Inc.' name and/or logo or trademarks when using social media networks or online communications.
8. Each individual employee, professional, volunteer or other associate of L.A.D.D., Inc. or its affiliates is personally responsible for his or her content on social media networks and other online communications.
9. Any communications should reflect an individual's personal point of view and not the viewpoint of L.A.D.D., Inc.
10. Employees shall not represent, claim or imply that they are speaking for, or representing on behalf of L.A.D.D., Inc. The content should be clear that such communications are the individual's personal opinions and do not reflect the opinion of L.A.D.D., Inc. or its affiliated entities.
11. If employees, professionals, volunteers or other individuals associated with L.A.D.D., Inc. acknowledge their relationship with L.A.D.D., Inc. in an online community, they shall include disclaimers in their online communications advising that they are not speaking officially on behalf of L.A.D.D., Inc.
12. Employees are solely responsible and liable for the content they post or publish and L.A.D.D., Inc. shall not be liable for any errors, omissions, losses or damages claimed or incurred due to any content posted or published by an employee. We encourage employees to use the L.A.D.D. Mission, Vision, and Values to help guide them in their actions and words.
13. Content or information posted or published remains available for indefinite periods of time.
14. Before posting or publishing, content should be considered carefully and caution should be exercised. Employees should exercise good judgment and strive to be accurate, fair and responsible when using social media networks and should be respectful and professional to fellow employees, supervisors, and L.A.D.D., Inc. Following the L.A.D.D. Mission, Vision, and Values will help you to communicate in a positive, open, effective manner.
15. Employees and others associated with L.A.D.D., Inc. may not post or publish disparaging material that is libelous, slanderous, or defamatory which identifies L.A.D.D., Inc., administrators, managers, supervisors, employees, or people supported/families, which is false and damages their reputation.
16. Employees need to be aware of their relationship to L.A.D.D., Inc. in all social media disclosures. Nothing gains more notice in social media channels than honesty or dishonesty. Employees who have a vested interest in something they are discussing, should acknowledge that relationship and point it out, so long as they can do so without forfeiting their legal

- rights to engage in concerted or protected activities related to their employment.
17. Employees are encouraged to use L.A.D.D., Inc.'s numerous options to employees to ask questions, make comments/give feedback and suggestions for improvements in the most efficient and effective manor via Corporate Compliance, Quality Assurance, and/or contacting Directors instead of posting information via electronic communications. Solutions to employment problems can be addressed using L.A.D.D., Inc. options whereas electronic postings offer no solutions.
 18. Employees shall not access, use, post, publish, or monitor any social media network or online communication forum while at work at L.A.D.D., Inc., whether through personal communications devices, such as laptops, cell phones, smart phones, PDAs, or other similar devices, or while on L.A.D.D., Inc. computers, unless expressly authorized to do so for L.A.D.D., Inc. purposes.
 19. Employees shall not download, install or use social media network software on L.A.D.D., Inc. computers.
 20. Employees are responsible for understanding and being aware of the L.A.D.D., Inc. policy on harassment and violence at the workplace found in the Handbook/Code of Conduct and how those policies affect an employee's use of social media.
 21. Employees may be disciplined, up to and including termination, by L.A.D.D., Inc. for communications, commentary, or images that violate this policy.
 22. As evidenced by FEMA's adoption, social media tools are becoming increasingly important in local and incidental crisis and emergency management communications. Nevertheless, even in times of crisis, disaster or emergency, only employees with the authority to speak on behalf of L.A.D.D., Inc. are permitted to do so.
 23. L.A.D.D., Inc. reserves the right to monitor, restrict, block, suspend, terminate, delete or discontinue access to any work-related social media network sites without notice and at its sole discretion.
 24. Suspected violations of this policy can be reported to the Corporate Compliance Officer via the anonymous hotline, by email to corporatecompliance@laddinc.net or by submitting a Confidential Complaint.

TOBACCO USE POLICY

PURPOSE

To create a, tobacco free environment for the health and safety for all and to meet the rules of the counties, state, and federal government.

SCOPE

This policy applies to all employees, people supported and visitors to L.A.D.D., Inc. facilities and vehicles where supports are provided, that are owned and/or operated by L.A.D.D., Inc. as well as employee vehicles if providing transportation for persons supported.

POLICY

All L.A.D.D., Inc. programs and vehicles operated by L.A.D.D., Inc. will provide a tobacco free environment for the people we support, visitors, and employees. Tobacco free means tobacco products that may be chewed or smoked, the use of smokeless tobacco products, and the use of unregulated nicotine products (e.g., "e-cigarettes") is prohibited in residential spaces, offices, program locations or within 25 feet of any of those locations.

For purposed of this policy Tobacco free includes all the following:

Smoke/Tobacco-Free means smoking, the use of smokeless tobacco products (chew), the use of unregulated nicotine products, and the use of electronic smoking devices (which includes e-cigarettes) or any other related products or devices used for tobacco or tobacco products.

PROCEDURE

1. All L.A.D.D., Inc. vehicles or employee vehicles providing transportation for people supported will be smoke/tobacco/nicotine free. No tobacco or unregulated nicotine products can be used around any people we support at any age, and State Law requires no smoking around those 18 years or younger.
2. Tobacco products and unregulated nicotine products are strictly prohibited in all enclosed areas within the workplace without exception.
3. Use of Tobacco or nicotine products are permitted only in designated areas outside of the programs/offices. Some services will be completely smoke free. This means no tobacco products or unregulated nicotine products at any time throughout the shift. Staff can request a transfer to available positions in other programs if preferred.
4. If an employee is providing supports in a person's home where there are tobacco or unregulated nicotine product users, staff may request a transfer to a non-tobacco/nicotine location.
5. L.A.D.D., Inc. will follow any Federal, State, Local government ordinances concerning non-tobacco usage locations.
6. All employees will review the Tobacco Usage Policy and where the designated area is at any programs.

7. All cigarette butts or other tobacco or nicotine usage by-products must be disposed of in the appropriate approved containers in the designated Tobacco Usage/Smoking area, if Tobacco is allowed.
8. Staff should decide among each other when the appropriate opportunity is for tobacco usage; safety of the people we support is always given first priority. Only one staff may be away from the service location using tobacco products at a time.
9. Any non-smokers should not be exposed to second hand smoke or other nicotine by-products; i.e. if you are outside smoking and a person supported is in the area, you must ensure you are a safe distance from them.
10. Management reserves the right to suspend any tobacco or nicotine products usage privileges if used inappropriately or at a program where a staff must be present inside the home at all times to ensure safety.
11. Employees who use tobacco or nicotine products and would like this opportunity to quit may participate in tobacco or nicotine cessation programs offered by local Health Depts. Assistance is also given by calling the Michigan Quit Line at 1-800-QUIT-NOW.
12. All employees share in the responsibility for adhering to and abiding by this policy.
13. Any person who witnesses a violation to this policy should bring it to the attention of the offending party and seek a voluntary resolution.
14. If the violator is not cooperative, staff should bring it to the attention of Management for a complete investigation.
15. A copy of the Tobacco Policy is available in the Employee Handbook/Code of Conduct, on the company website as well as, available to potential and existing employees upon request.
16. A Smoke Free area is established at all locations in Berrien County within 25 feet of any entrance, window, and ventilation system per county regulations.

HIPAA SECURITY/SAFEGUARD POLICY

PURPOSE

To establish a policy to insure privacy, security, and confidentiality are maintained at all times and in all settings.

SCOPE

This policy shall apply to all L.A.D.D., Inc. persons supported, employees, programs and services provided by L.A.D.D., Inc.

POLICY

It is the policy of L.A.D.D., Inc. to protect the privacy and confidentiality of protected health information for the people we support and the employees of L.A.D.D., Inc. The following safeguards/security measures have been implemented to ensure this privacy protection.

PROCEDURE

Employees of L.A.D.D., Inc. are required to do the following:

1. To protect the privacy of the people's individual records:
- b. Sign-out individual records when removing from the home, including the following information:
 6. Name of record leaving the home
 7. Date
 8. Employee Signature
 9. Destination
 10. Employee must sign again when record is returned and in place in the program.
- c. While out of the program, employees must secure the record(s) at all times. This includes whether the record is on their person or locked in their vehicle the requirement. Employees must ensure that no information is visible at any time. This policy will be strictly enforced..
- d. Employees must take steps to ensure people who do not have a need to know or have permission to see information regarding the individuals we support do not have access to any individual records, information, etc.
- e. When employees leave the program, they are responsible for securing the premises by locking all doors.
- f. Records are to be secured in the programs at all times. Records must be secure in a manner that they are not readily recognized or available. Unauthorized persons cannot not have access therefore records a are not to be left unattended.
2. Carrying confidential records:
 - a. Lock records in trunk, when possible.
 - b. If records have to be left in vehicle for a short amount of time insure vehicle is locked and records are out of sight.
 - c. Records must not be left in vehicle for an extended period of time, i.e. overnight.
3. Any devices, whether it be a L.A.D.D., Inc. device or a personal device, containing confidential material (i.e. Laptops, Cell Phones with data access abilities, Tablets, Day-Runners, Planners, etc.) must be kept secure at all times and must be password protected. **The storage of confidential material on removable storage devices is prohibited.** All devices must

be set to contain the approved L.A.D.D., Inc. confidentiality statement at the bottom of any business related communications.

4. Verification of Identification:
 - a. Employees must ask for identification to verify the authority of anyone requesting entry into the program.
 - b. Employees must ask for identification to verify the authority of anyone requesting information regarding the person or program.
 - c. Employees must make reasonable attempts during phone conversations to verify the caller. Attempts could include obtaining the person's contact information, hanging up the phone and verifying the accuracy and authority or providing the contact information to a member of management so they may contact the individual.
5. Faxing:

Employees should make reasonable attempts to verify fax numbers prior to faxing confidential and private information.

 - a. Employees need to periodically call to verify the intended recipient receives the faxes.
 - b. Management will keep fax machines in a reasonably secure location.
 - c. Employees will use required L.A.D.D., Inc. cover sheet when faxing.
6. L.A.D.D., Inc. Communication and data systems which include but are not limited to:
 - a. telephone,
 - b. cell phones whether it be a L.A.D.D., Inc. device or a personal device,
 - c. email,
 - d. voice mail,
 - e. facsimiles,
 - f. L.A.D.D., Inc. databases,
 - g. computers/laptops/tablets whether it be a L.A.D.D., Inc. device or a personal device that are used to access,
 - h. Internet,
 - i. World Wide Web,
 - j. Web based data systems,
 - k. L.A.D.D. Inc. work products,
 - l. Protected Health Information,
 - m. Confidential employee information,

The above items are subject to the following standards. (Refer to the L.A.D.D., Inc. Social Media Policy for additional standards)

- a. Any function related to employment with L.A.D.D., Inc. and result in the production of information, documentation or messages created, sent, received, accessed, or stored collectively constitute company records and property and therefore the following expectations must be followed by all employees.
- b. Email and any usage of L.A.D.D., Inc. computers are not to be used in any way to harass, defame or humiliate. Electronic communications may not contain content that a reasonable person would consider to be defamatory, offensive, harassing, disruptive, or derogatory, including but not limited to sexual comments or images, racial or ethnic slurs, or other comments or images that would offend someone on the basis of race, gender, national origin, political beliefs, disability, sexual orientation, pornography, religious or political beliefs, national origin or disability. Employees who receive any emails via company computers or from other employees with this content must report the matter to Corporate Compliance immediately
- c. The L.A.D.D., Inc. electronic communications systems are to be used to conduct company business. Employees may not use the electronic communications systems for political causes; football pools or other sorts of gambling; illegal activities; seeking/inquiring about job opportunities outside of the organizations; list serves for non-work purposes; solicitations or advertisements for unrelated work purposes; or creating, possessing, uploading, downloading, accessing, transmitting, or distributing materials of a sexual nature.
- d. Employees may not use L.A.D.D., Inc.'s electronic communications systems to post non-work related information, opinions, or comments to Internet discussion groups, Social Networking sites and other such forums. Employees are prohibited from passing off their views as representing those of L.A.D.D., Inc. Again, while at work; employees must follow the corporate values as required in the core competencies of their job description.
- e. There should be no expectation of privacy in anything accessed, created, stored, sent or received on the company's computer and data systems.
- f. Any computer activity during work hours or on L.A.D.D., Inc. Computers, including messages, may be viewed by L.A.D.D., Inc. without prior notice.
- g. Computers cannot be used for the transmission or viewing of profanity, adult related material, sexually explicit or otherwise offensive material.
- h. Virus protection is maintained by the IT/QA Department. No other forms of virus protection software are to be used or downloaded with out approval from the IT/QA Department.
- i. All transmissions of confidential information must be encrypted as specified by the HIPAA Security Rule.

- j. Employees must maintain a log-on password and screensaver password on all computers. Passwords must contain a combination of upper and lower case letters, numbers and functions. Ex: 1L#dd\$
- k. Employees should keep in mind that emails, texting or other forms of business communication must be communicated with a positive intent and must communicate appropriately and professionally.
- l. Only work related information or work products should be sent through email.
- m. Social Networking sites are subject to the HIPAA confidentiality standards regardless of time of use.
- n. Emails that go outside of the L.A.D.D., Inc. Citrix that contain any identifying information regarding a person served, such as full name or a description that would make them easily identified must be encrypted and only sent for the purpose of Treatment, Payment or Health Care Operations. The sender of this type of email should contact the agency where the information is being sent to see if they have a secure email system set up prior to sending this type of information or use L.A.D.D., Inc. encryption system.
- o. Electronic communications must be positive, motivating and fit the Mission, Vision and Values of L.A.D.D., Inc.
- p. Employees cannot download or add any programs to company computers without IT/QA Department approval. Removable storage devices are not to be used.
- q. Data backup must occur regularly according to the Technology Plan for all data with backup's stored offsite.
- r. Any portable device such as a laptop, tablet, cell phones with data access abilities, etc. will be password protected to insure no violations of confidentiality occur. Passwords must contain a combination of upper and lower case letters, numbers and functions. Ex: 1L#dd\$ Employees are never to give out their passwords or log in information.
- s. Although employees are expected to use passwords to access some of the electronic communications systems, such communications are not private and security cannot be guaranteed. In surfing the Internet and World Wide Web, employees should remember that all connections and sites visited may be monitored and recorded. Employees should assume that any communications – whether business-related or personal – that they create, send, receive, or store on their company's electronic communications systems may be read or heard by someone other than the intended recipient. In particular, highly confidential or sensitive information should not be sent through e-mail, the Internet, or the World Wide Web unless encrypted or password protected.
- t. Employees may not upload, download, or otherwise transmit copyrighted, trademarked, or patented material, trade secrets; or other confidential, private, or proprietary information or materials in violation of any legal constraints. Employees may not upload, download or otherwise transmit any illegal information or materials. Employees may not use L.A.D.D., Inc.'s electronic communications systems to gain unauthorized access to remote computers or other systems or to damage, alter, or disrupt such computers or systems in any way, nor may employees, without authorization, use someone else's code or password or disclose someone else's code or password, including their own. Employees may not enable unauthorized third parties to have access to or use L.A.D.D., Inc. Electronic communications systems, nor may employees otherwise jeopardize the security of L.A.D.D., Inc.'s electronic communications systems.
- u. Employees must use the utmost care in creating electronic communications. Even when a message has been deleted, it still exists on a back-up system, can be recreated, printed out, or may have been forwarded to someone else without its creator's knowledge. As with paper records proper care should be taken in creating electronic records, which may someday have to be produced in connection with legal and/or business needs. Paper documents created and received by an employee, it is each employee's responsibility to insure that those electronic messages that should be retained are in fact saved. Those messages that need not be retained should be deleted.
- v. Any files downloaded from the Internet and any computer disks received from non-L.A.D.D., Inc. sources must be scanned with virus detection software before installation and execution. The intentional introduction of viruses, attempts to breach system security, or other malicious tampering with any of your employer's electronic systems including the L.A.D.D., Inc. databases and website are expressly prohibited and employees may face criminal prosecution.
- w. All information accessed by employees either in electronic or written format will be done on a need to know basis. Unauthorized access to information not needed to complete job responsibilities is prohibited.
- x. L.A.D.D., Inc. employees may be using electronic systems/databases in conjunction with contract agencies; and therefore, will be required to follow additional security standards (such as no printing of materials) set by those agencies in addition to all of the above rules.
- y. L.A.D.D., Inc. reserves the right to monitor, access, retrieve, read, and disclose to law enforcement officials, contract agencies or other third parties all messages created, sent, received, or stored on the electronic communications systems without prior notice to the originators and recipients of such messages. Authorized employees may monitor the electronic communications of employees to determine whether there have been any violations of law, breaches of confidentiality or security, communications harmful to the business interests of L.A.D.D., Inc., or any violations of this policy and any other company policy and communication sent via L.A.D.D., Inc. computers or cell phones is the property of the corporation. There should be no expectation of privacy in anything created, stored, sent or received on the company's computer system.

7. A photograph, which includes still or video images, of the people supported may be taken with a program camera as long as that camera is kept locked and secured while not in use. A photograph of a person supported may be taken for the purposes of providing services to the person, determining the identity of the person or for education and training with the prior written consent of the person or their legal representative. The photograph is maintained in the person's record until discharge or until the purpose for which the photograph was taken no longer exists. With specific signed consent a person or their legal representative can agree to the use of a photograph on the L.A.D.D., Inc. website, brochures, newsletters and reports.
8. Video surveillance that includes recording of images is prohibited in keeping with the Michigan Mental Health Code MCL 330.1724.
9. All L.A.D.D., Inc. office space is to remain locked while not in operation and all confidential information is to be locked in a secured location within the office. Individual workstations are to be maintained with all confidential information secured and computers logged off. Confidential information that is no longer in use or subject to destruction will be shredded by an approved contractor or at the point of production.
10. All IT assets are secured per the Technology Plan to include use of mobile device security software, email encryption software and the use of an approved IT asset destruction contractor.
11. Suspected violations of this policy can be reported to the Corporate Compliance Officer via the anonymous hotline, by email to corporatecompliance@laddinc.net or by submitting a Confidential Complaint. Reports may result in an investigation, assessment and notification to affected individual.